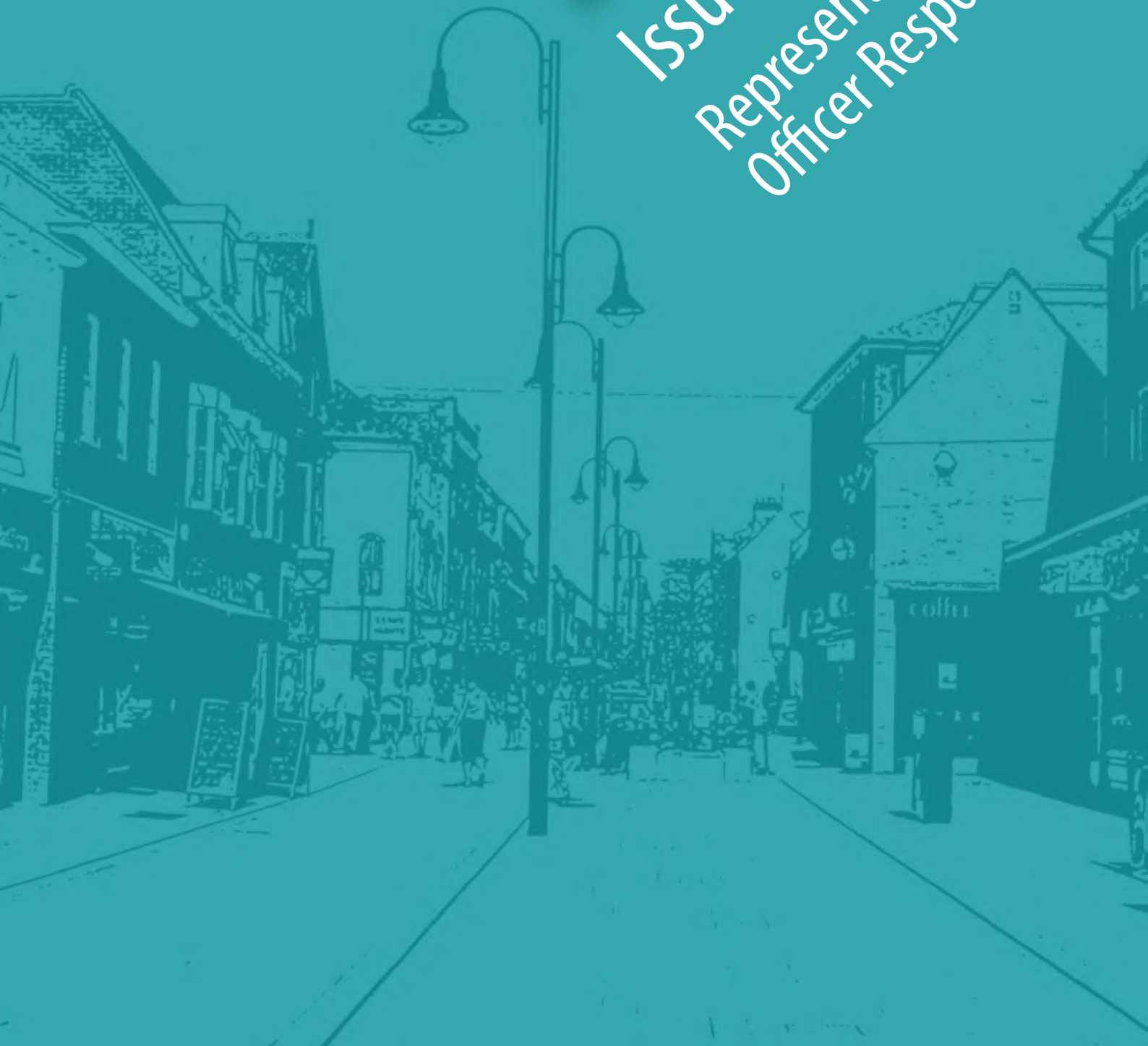




# Issues and Options Representations and Officer Responses



Bromsgrove District Plan Review  
Issues and Options Representations and Officer Responses

Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
<b>Q.VO1: Do you think the Vision adequately captures what we want to achieve for Bromsgrove District and the kind of place we want it to be by the end of the plan period? If not, what do you think we've missed?</b>							
VO1	1	Tammy	Williams	Alvechurch Parish Council		Considering the financial cutbacks that LPAs like Bromsgrove have experienced and are still experiencing it's probably unwise for the Plan to say it's proud of the level of services on offer.	Comments noted, however paragraph 2.1 states "...building a District where people want to live and work and are proud of the level of services on offer". It is clear that this is a forward thinking paragraph and seeks to aspire to this status.
VO1	1	Tammy	Williams	Alvechurch Parish Council		<p>Arguably the vision and strategic objectives do not do justice to the emphasis on the economic development of Bromsgrove District set out in the BDC Cabinet papers of April 2017 and in the July 2017 Council report given by the Cabinet portfolio holder. As such Readers of the I and O consultation paper may operate with the view that the District plan review exercise is chiefly about finding land for more homes for the dormitory district to the West Midlands conurbation that is Bromsgrove. However the thrust of the April 2017 BDC Cabinet policy is now quite different in pointing to a new dynamic role for Bromsgrove district as a larger, more diverse centre for business with a key role in the West Midlands economic resurgence over the next decade and beyond.</p> <p>As such land for the expanding local businesses , for business new to the district and land for homes to provide for those who are and who will be working in Bromsgrove, are elements needing more emphasis. Making more of this part of the vision will inevitably affect the later responses given to or about the adequacy of the questions in the I and O consultation paper. It will be evident that this review has to be an exercise about the release of land for business use, for improving roads and transport arrangements and for housing.</p> <p>In consequence a check does need to be made that in this review economic development content , housing issues and transport implications will go together within a new district plan that does shade into a wider scale exercise beyond a focus solely on the Bromsgrove district itself.</p>	Comments noted. It is considered that additional wording could be included in the Vision which refers to economic development within Bromsgrove District.
VO1	2	Gill	Lungley	Barnt Green Parish Council		The vision makes no reference to the benefits of the countryside around Bromsgrove and the vision does not differentiate from that of a large city.	The countryside in Bromsgrove is highly valued and has many benefits, it is felt this will continue to be incorporated into the Plan Review as already acknowledged in the adopted BDP.
VO1	2	Gill	Lungley	Barnt Green Parish Council		The vision makes no reference to transport and providing ease of travel.	It is acknowledged that transport and other key infrastructure will be needed this will be incorporated into the Plan where appropriate.
VO1	3			Belbroughton Parish Council		The Parish Council was content with the review processes detailed by the District Council's representatives during the joint open meetings held in Belbroughton and Fairfield.	Comments noted.
VO1	11	Rosamund	Worrall	Historic England		The Vision for the Plan makes provision for consideration of the historic environment to take place.	Comments noted.
VO1	13			Natural England		We note that the vision is the same as the vision in the adopted Core Strategy. The vision is adequate and we welcome the inclusion of the natural environment. However the phrasing of the last sentence gives priority to the appearance of the environment. The natural environment needs to do more than be attractive; it is our life support system, and its functioning is essential. We recommend revisiting the vision to give this part of it more meaning.	<p>The Vision is the same as it is the Adopted District Plan which is being reviewed, as this Plan has not been adopted for too long it is felt the Review is seeking to achieve the same as the adopted Plan with a focus on the growth requirements.</p> <p>The word "quality" will be included alongside when word "attractiveness" to ensure this is a focus for the plan.</p>
VO1	17	Stuart	Morgans	Sport England		Sport England supports the reference in the Vision set out in paragraph 2.3 to creating healthy communities, but raises concern that there is a lack of reference to providing the social infrastructure (which includes sports and recreation facilities) that helps people live healthy lifestyles.	Comments noted and agreed. The word "quality" can be included. Further consideration will be had to including reference to social infrastructure.

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VO1	18	Andrew	Morgan	Warwickshire and West Mercia Constabulary		Whilst WP and WMP back the Vision of Bromsgrove District to be achieved by the end of the plan period, there is currently no acknowledgement that additional infrastructure provision will be required to support this. The following amendment is therefore advised: ‘...People from all sections of society will have been provided with better access to homes, jobs, services and infrastructure. The attractiveness...’ The proposed amendment is underpinned by paragraphs 20 and 92 of the National Planning Policy Framework (NPPF) (2018), which state that strategic policies should set out an overall strategy and make sufficient provision of the infrastructure needed for their areas.	Comments noted and agreed.
VO1	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Yes but question whether the word "attractiveness" is the best one to use in relation to the natural environment. We suggest that "quality and attractiveness" would probably encompass the breadth of interests listed more effectively and might be a more appropriate phrase to use here.	Comments noted and agreed.
VO1	20	P	Harrison	Wythall Parish Council		We consider that the Vision should aspire to “ BUILDING A BETTER BROMSGROVE” for everyone.	It is considered that the Vision does aspire to achieve a better Bromsgrove. This sentence as an overall Vision was the phrase used for the Townscape Heritage Initiative Scheme for Bromsgrove Town Centre which is separate to the Vision for the BDP.
VO1	28	Emily	Barker	Worcestershire County Council		Strategic purposes do not address the natural or historic environment, risks failing to promote and protect a healthy natural environment .	The Strategic Purposes are Council wide and not solely focused on what will be achieved through the District Plan. The natural and historic environment feature heavily in the adopted BDP and will continue to do so through the review.
VO1	28	Emily	Barker	Worcestershire County Council		Strongly support the Council’s Vision that the natural environment will be preserved and enhanced, although the measure of success being "attractiveness" is inappropriate and should be reconsidered.	Comments noted.
VO1	28	Emily	Barker	Worcestershire County Council		An additional Strategic Purpose should be added "Help me to enjoy good health and wellbeing."	The Strategic Purposes are Council wide and not solely focused on what will be achieved through the District Plan.
VO1	34	Sue	Baxter			I don’t understand the vision as stated. Is it a vision for the plan or a vision for Bromsgrove	The Vision will be included in the District Plan. It sets out what we seek to achieve for Bromsgrove through the District Plan.
VO1	35	Peter	King	Campaign to Protect Rural England		At the heart of the existing Bromsgrove District Plan is a fundamental misappraisal of the economic geography of our district. The town of Bromsgrove has a tightly drawn travel-to-work area (TTWA), consisting of not very much more than the town, though perhaps also including Catshill and Marlbrook and Stoke Prior. This constitutes a Housing Market Area (HMA).	It is unclear where this reference is taken from as this is not a direct quote from the Adopted Bromsgrove District Plan. Regardless of this the text quoted is factually incorrect and would not be used to influence the Vision of the Plan.
VO1	35	Peter	King	Campaign to Protect Rural England		The present plan was drawn up on the basis that the town is the centre of the universe for the district. The town is in fact an irrelevance for the majority of the residents of the district, save as the seat of local government. This misapprehension at the heart of BDP forms a false premise from which many of the other policies flow. It is a basic tenet of logic that false premises lead to false conclusions.	Comments noted. The fact is the Bromsgrove Town is the largest Town within Bromsgrove District and therefore is listed as the main town in the Settlement Hierarchy in the adopted plan. National Planning Policy sets out that for a range of sustainability reasons development (including protecting the rural area from unsustainable development) should be guided towards larger urban areas.
VO1	36	Conrad	Palmer	Fairfield Village community Association		YES	Comments noted.
VO1	41	Helen	Davies	Transport for West Midlands		In general Transport for West Midlands (TfWM) supports the vision for the area contained within this document and supports its associated aims and policies. We are particularly supportive of the strong correlation between the Plan and our relevant policy documents such as Movement for Growth and the 10 year delivery plan.	Comments noted.
VO1	42			Wythall Residents Association		The vision should aspire to "Building a better Bromsgrove" for everyone	It is considered that the Vision does aspire to achieve a better Bromsgrove. This sentence as an overall Vision was the phrase used for the Townscape Heritage Initiative Scheme for Bromsgrove Town Centre which is separate to the Vision for the BDP.

**Bromsgrove District Plan Review**  
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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO1	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Vision should be revised to strengthen the approach to housing to make sure it is clear that the Plan seeks to provide a sufficient supply of homes. Suggest the following amendment: " People from all sections of society will have been provided with better access to jobs, services and homes, by providing a sufficient supply of land for new homes for the District and neighbouring authorities." Given the importance of meeting the unmet housing need from the GBHMA, and the need for strategic policies to provide for OAN it is considered appropriate for this to be clearly outlined within the vision.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	47	Michael	Jones	Caddick Land		The Local Plan Review is primarily to deal with Green Belt release to accommodate the residual housing requirement in the currently adopted Local Plan and to accommodate a proportion of the unmet needs of Birmingham. The Vision needs to make it clearer that this objective is wider than the District of Bromsgrove and needs to allow for the release of Green Belt adjoining the boundary with Birmingham to the benefit of strategic objectives both within Bromsgrove District and the Birmingham/Bromsgrove boundary	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	Whilst the Vision delivers appropriate and suitable aspirations for the future growth and development of the District, it does not provide sufficient regard to the development of Bromsgrove in the context of its wider position. The Vision should make sufficient aspirations for the delivery of growth that is sustainable for the capacity of the District and ensures that the functional relationships between Bromsgrove and the surrounding Local Planning Authorities and Market Areas are included appropriately in this Vision and how these will impact on the aspirations of growth of the District.  Given the pressures that exist and are applied to the District from arising unmet needs from authorise beyond the District, in particular from the West Midlands Conurbation and Greater Birmingham, this should form at least a component of this Vision.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	52	Tom	Ryan	Claremont Planning	Bellway Homes	Whilst the Vision delivers appropriate and suitable aspirations for the future growth and development of the District, it does not provide sufficient regard to the development of Bromsgrove in the context of its wider position. The Vision should make sufficient aspirations for the delivery of growth that is sustainable for the capacity of the District and ensures that the functional relationships between Bromsgrove and the surrounding Local Planning Authorities and Market Areas are included appropriately in this Vision and how these will impact on the aspirations of growth of the District.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	The Vision does not provide sufficient regard to the development of Bromsgrove in the context of its wider position. The Vision should make sufficient aspirations for the delivery of growth that is sustainable for the capacity of the District and ensures that the functional relationships between Bromsgrove and the surrounding Local Planning Authorities and Market Areas are included appropriately in this Vision and how these will impact on the aspirations of growth of the District. Given the pressures that exist and are applied to the District from arising unmet needs from the West Midlands Conurbation and Greater Birmingham, this should form at least a component of this Vision.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	54	Katherine	Else	Claremont Planning	Miller Homes	The Vision does not provide sufficient regard to the development of Bromsgrove in the context of its wider position. The Vision should make sufficient aspirations for the delivery of growth that is sustainable for the capacity of the District and ensures that the functional relationships between Bromsgrove and the surrounding Local Planning Authorities. The Vision should be able to more appropriately provide an overarching vision of how the District will growth over the new Plan period, taking into account existing directions of growth and also the arising development pressures form the Greater Birmingham HMA and Market Areas are included appropriately in this Vision and how these will impact on the aspirations of growth of the District.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO1	72	Stephen	Peters			I consider that the Vision should aspire to “ BUILDING A BETTER BROMSGROVE” for everyone.	It is considered that the Vision does aspire to achieve a better Bromsgrove. This sentence as an overall Vision was the phrase used for the Townscape Heritage Initiative Scheme for Bromsgrove Town Centre which is separate to the Vision for the BDP.
VO1	76	Emily	Vyse	GVA	University of Birmingham	<p>The District may also need to deliver a proportion of Birmingham City Council’s unmet need through the Duty to Cooperate. Indeed, co-operating with the West Midlands Conurbation to address wider development needs is one of the Strategic Issue’s identified in this Issues and Options consultation document.</p> <p>Given the importance of this issue in the Review, it is considered that the Vision should make reference to the District having successfully worked collaboratively with its neighbours to address cross boundary issues and to have contributed to tackling the national housing crisis and the significant need for new homes that exists in the wider West Midlands.</p>	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	80	John	Pearce	Harris Lamb	Bloor Homes	The Vision is too focused on the District and fails to mention the need for the emerging Plan to help contribute to meeting the wider unmet housing needs of the Greater Birmingham Housing Market Area. The need to review the Bromsgrove Development Plan (BDP) has in a large part been dictated by wider issues across the Greater Birmingham area and specifically the inability of Birmingham to meet its full objectively assessed housing needs within its own administrative area. As such, the emerging Plan should acknowledge and set out within its vision that contributing to meeting these needs in part, is central to the District's future vision for development. An additional reference is therefore sought in the Vision that states the Plan will meet the wider needs of the region/HMA as well.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	87			Indenture		Yes.	Comments noted.
VO1	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	Taylor Wimpey considers the proposed Vision for Bromsgrove District to be acceptable. However, the delivery of the proposed Vision will be key in ensuring the District’s aspirations are met.	Comments noted.
VO1	94			Nigel Gough Associates	Aniston Ltd	Yes	Comments noted.
VO1	95			Nigel Gough Associates	Monksgraston Ltd	The vision appears to have captured DC's aspirations.	Comments noted.
VO1	96			Nigel Gough Associates	Mr Stapleton	The vision appears to have captured Bromsgrove District Council’s aspirations.	Comments noted.
VO1	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	The vision appears to have captured Bromsgrove DC's aspirations	Comments noted.
VO1	99	Mark	Dauncy	Pegasus	Gallagher Estates	Broadly support	Comments noted.
VO1	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Broadly consider the Vision to be acceptable, the use of the word ‘preserved’ is perhaps preventative of change: if built form/settlements/the natural environment is ‘preserved’, it remains unchanged. Preserve can be used in the context of the historic environment in a positive way. Don’t agree that it is particularly positive when used in the way it is currently.	The word preserved does not feature in the Vision.
VO1	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Whilst broadly we consider the Vision to be acceptable, the use of the word ‘preserved’ is perhaps preventative of change: if built form/settlements/the natural environment is ‘preserved’, it remains unchanged. Preserve can be used in the context of the historic environment in a positive way, but we don’t agree that it is particularly positive when used in the way it is at the moment.	The word preserved does not feature in the Vision.
VO1	112	Gareth	Sibley	RCA Regeneration	Piper Group	The use of the word preserved is perhaps preventative of change. Preserve can be used in the context of the historic environment in a positive way.	The word preserved does not feature in the Vision.
VO1	113	Gareth	Sibley	RCA Regeneration	CAD Square	Whilst broadly we consider the Vision to be acceptable, the use of the word ‘preserved’ is perhaps preventative of change: if built form/settlements/the natural environment is ‘preserved’, it remains unchanged. Preserve can be used in the context of the historic environment in a positive way, but we don’t agree that it is particularly positive when used in the way it is at the moment.	The word preserved does not feature in the Vision.
VO1	115	John	Breese	Rosconn Strategic Land		Generally support the Vision for the Bromsgrove District Plan Review.	Comments noted.

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VO1	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	The use of the term preserve is considered to be inconsistent with the general thrust of the Plan Review, which is to address a shortfall in housing land supply.	The word preserved does not feature in the Vision.
VO1	119	Darren	Oakley	RPS Group	Gleeson	It is noted from the outset that the purpose of this Plan is to remedy any matters left unresolved as part of the 2011-2030 District Plan, adopted in January 2017. A large component of this relates to the residual growth requirements not met in the District Plan, equating to some 2,300 dwellings. On this basis, RPS queries whether the term 'preserve' should be embedded within the vision for growth, which is not in keeping with the general thrust of the Plan review and does not reflect the need for additional development.	The word preserved does not feature in the Vision.
VO1	120	Michael	Davies	Savills	Cala Homes	Reference should be made to BDC's position in the wider sub region/HMA and what role the Council sees the District playing in supporting the GBHMA's growth. Also consider widening the vision to consider opportunities arising from key investment in HS2 and the Commonwealth Games.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	120	Michael	Davies	Savills	Cala Homes	Consider that a vision for increased investment in public transport and other key infrastructure, should be added to the Council's Strategic Purposes.	The Strategic Purposes are Council wide and not solely focused on what will be achieved through the District Plan.
VO1	122	Michael	Davies	Savills	Landowners	We consider that reference should be made to Bromsgrove District Council's ('BDC') position in the wider sub region / Housing Market Area's ('HMA') and what role the Council sees the District playing in supporting both Birmingham and the Black Country HMA's growth. The Council may also need to widen the vision to consider opportunities arising from further growth of Birmingham from schemes such as HS2 and the 2022 Commonwealth Games.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	122	Michael	Davies	Savills	Landowners	Paragraph 102 of the NPPF states that 'transport issues should be considered from the earliest stages of plan making and development proposals'. A vision for increased investment in public transport and other key infrastructure, should be added to the Council's Strategic Purposes. This would ensure that appropriate support is given to the provision for the infrastructure required to enable development.	The Strategic Purposes are Council wide and not specific to planning. It is acknowledged that transport and other key infrastructure will be needed this will be incorporated into the Plan where appropriate but is not necessary into the Strategic Purposes for the Council.
VO1	123	Michael	Burrows	Savills	Landowners	Reference should be made to the BDC position in the wider sub region / HMAs and what role BDC sees the District playing in supporting the growth of the HMAs for both Birmingham and the Black Country. BDC may also need to widen the Vision to consider opportunities arising from further growth of Birmingham as a result of schemes such as HS2 and the 2022 Commonwealth Games.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	123	Michael	Burrows	Savills	Landowners	Paragraph 102 of the NPPF states that 'transport issues should be considered from the earliest stages of plan making and development proposals'. A vision for increased investment in public transport and other key infrastructure, should be added to BDC's Strategic Purposes. This would ensure that appropriate support is given to the provision for the infrastructure required to enable development.	Comments noted. It is agreed that some wording could be included which refers to the delivery of infrastructure.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO1	136	Kathryn	Young	Turley	Land Fund	<p>Our client is committed to helping the Council deliver its vision of providing people from all sections of society with "better access to homes".</p> <p>In order to deliver this Vision it is critical that the LPR allocates sufficient land to meet its locally identified housing need and any unmet need arising from neighbouring authorities. As accepted by the Council it is necessary to release land from the Green Belt for residential development and this should be done in sustainable locations in accordance with the Council's spatial strategy set out at Policy BDP2 of the Bromsgrove District Plan (i.e. the 'larger settlements'). It will be necessary therefore, through the LPR, to amend existing Green Belt boundaries.</p> <p>In light of the current housing shortfall within the Greater Birmingham Housing Market Area ('GBHMA') Land Fund recommend that the <u>Vision also includes reference to the District making a meaningful contribution to the needs arising within the GBHMA.</u></p> <p>Hagley, which is identified as a 'large settlement' in the BDP benefits from a range of services and facilities including, but not limited to, a primary school, two secondary schools and a train station. Hagley train station provides direct, public transport links to Birmingham and the wider West Midlands conurbation where there is a significant shortfall in land to meet identified housing needs. Given the range of facilities and transport infrastructure in Hagley the settlement should be recognised as the most sustainable 'large settlement'.</p>	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO1	137	Matthew	Fox	Turley	Redrow Homes	<p>Redrow support the draft Vision and particularly welcomes the Vision's reference to "better access to homes". However, we suggest that the Vision should also include reference to the District making an appropriate contribution to the needs of the Greater Birmingham Housing Market Area (GBHMA) as this is one of the most significant issues which the LPR must address. This is in line with paragraph 60 of the NPPF (2018) which states that in preparing strategic policies, in addition to the local housing need figure, any needs which cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.</p> <p>We would also suggest that the Vision should acknowledge that designated boundaries will need to be altered where appropriate (specifically settlement and Green Belt boundaries) in order to ensure that the District meets its housing requirement in the most sustainable locations.</p>	<p>Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.</p> <p>It is acknowledged that boundary alterations may be necessary in order to ensure that development requirements are met. It is not felt necessary to include this in the Vision as this will be a matter of practicality and detailed elsewhere in the Plan.</p>
VO1	140	Sarah	Butterfield	White Young Green	Client	The requirement to undertake a full Green Belt Assessment and Review is also supported (Issues and options consultation document 1.15) in line with District Plan (Adopted) requirements. The Council's imminent Call for Sites consultation should feed into the Green Belt Assessment and Review in due course. Separate submissions will be made to the Council's Call for Sites consultation at the appropriate time.	Comments noted.
VO1	159	Howard	Allen			The vision totally misses the need to plan well. The plan is to build thousands of new houses yet no consideration, until they are built, will be given for the need for extra school places, GP and hospital services, shops, leisure facilities or public transport until after they are built, either by total or by estate.	Comments noted and agreed. It is considered that the Vision could include wording which refers to the need for growth in Bromsgrove and the supporting services which will be required.
VO1	161	Ian	Macpherson		Self	Yes	Comments noted.
VO1	171	Mark	Cooper			The vision is too wordy. A vision needs to be more punchy and set the tone for the 'Brand of Bromsgrove'. Something like... "Bromsgrove - a lively, historic market town that blends opportunity and innovation with outstanding family life and areas of unsurpassed natural beauty."	Comments noted. Although it is agreed the Vision would ideally be shorter, a number of concepts need to be covered by and therefore it is unavoidable the Vision is this length.
VO1	171	Mark	Cooper			The Vision doesn't capture what Bromsgrove wants to achieve because it doesn't tell you what Bromsgrove is or aims to be. What's missing is, in brief, an ultimate definition of Bromsgrove.	It is felt the Vision set out what Bromsgrove aims to be. Further information on Bromsgrove will be included in a District Profile of the Plan once adopted. If it is felt that anything is missing text suggestions would be appreciated.

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VO1	171	Mark	Cooper			The other obvious gap is the relationship between Bromsgrove District and Bromsgrove School. This is a major employer and source of income I believe (and if it isn't, then it should be!). Bromsgrove School can be described as an international centre of excellence for education - are the school and the district's strategies and objectives aligned at all? Are they mutually inclusive and beneficial? Are they sustainable? I think there's an opportunity for more mutual collaboration to enhance the image and performance of both entities.	The role that Bromsgrove School plays in the District however it is not appropriate to link to the strategies and objectives of individual establishments through the BDP Review.
VO1	171	Mark	Cooper			I would start with describing what Bromsgrove will be in 2050, almost paint a "day in the life" from a range of viewpoints to define and describe this, and then anchor the strategic objectives to each of these with regular deliverables. Some examples of what might be different; will we work in offices anymore? Home-working and mobile working are becoming the norm more and more in the digital age. What will the demographics of Bromsgrove District be?	Comments noted. It is felt the suggestion for the Vision as described may be too extensive for the BDP. It is accepted that alternative ways of working will become common place in the future and the BDP will seek to ensure it doesn't prohibit any future changes to new and innovative ways of working.
VO1	194	Darren	Oakley	RPS	Clients	VO.1 - The use of the term 'preserve' is considered to be inconsistent with the general thrust of the plan review, which is to address a shortfall in housing land supply, which was not addressed as part of the adopted plan process.	The word preserved does not feature in the Vision.
<b>Q.VO2: Do you think the Strategic Objectives are appropriate to deliver the plan's Vision? If not, what changes do you think we need to make?</b>							
VO2	1	Tammy	Williams	Alvechurch Parish Council		SO2 - Mention should be made that adopted Neighbourhood Plans can and will play a part in shaping future objectives within a District context	Neighbourhood Plans are important to the District and the District Plan, however it is not appropriate to mention them in this Objective.
VO2	2	Gill	Lungley	Barnt Green Parish Council		SO6 should also include better transport in and out of the District.	Comments noted. Reference to be included to move in "and out" of the District.
VO2	5	Kevin	Joynes	Beoley Parish Council		Strategic Objectives should make it clear that any new industrial development should be kept a reasonable distance away from existing dwellings to minimise the impact of light and noise pollution on residents.	This is not appropriate as a Strategic Objective but more appropriate within Policies relating to economic development.
VO2	7	Mark	Davies	Environment Agency		SO2 - We support your focus to place new development in sustainable locations, for example linked to our aim to site new built development in Flood Zone 1 (low probability) areas to prevent flood risk and ensure long term sustainability.	Comments noted.
VO2	7	Mark	Davies	Environment Agency		SO8 – We support the references to Biodiversity and we would seek appropriate blue infrastructure i.e. 'blue' landscape elements are linked to water such as pools, pond and wetland systems, artificial basins or watercourses. Along with green infrastructure they help form an interconnected network of environmental enhancements within and across catchments. We would also welcome identification of opportunities for and measures to secure net gains for biodiversity in line with the NPPF recent revisions.	Comments noted and agreed.  With regard to net gain this is too specific for an Objective but may be suitable for inclusion within Policy wording.
VO2	7	Mark	Davies	Environment Agency		SO9 – We support the reference to enhancing 'water quality' linked to Water Framework Directive (WFD) objectives. We would seek measures to improve water quality and water body status to help achieve good ecological status.	Comments noted. Measures to improve water quality and water body status may be appropriate for inclusion in Policy.
VO2	7	Mark	Davies	Environment Agency		SO10 – We would recommend that you include the phrase climate change 'adaptation' and mitigation. We support objectives to help manage but also 'reduce' flood risk in the area looking at cumulative impact opportunities. With regard to water resources we would look to promote water efficiency linked to evidence in your WCS. We are currently reviewing our water resources information to help inform your WCS update in relation to the above.	Comments noted and agreed.  Further water efficiency measures and reducing food risk may be appropriate for inclusion in Policy.
VO2	7	Mark	Davies	Environment Agency		SO11 – We support sustainable design objectives which would include for water efficiency and inclusion of SuDS.	Water efficiency is included within SO10. It may be more appropriate to refer to SuDS within Policy.
VO2	9	Alexandra	Burke	Hagley Parish Council		Objectives say nothing about the nature of the district which consists of two very separate sorts of communities in social and economic terms. 1) Town of Bromsgrove has a tightly drawn Travel to Work Area 2) Rest of the District lies in the shadow of the conurbation to the north. It's large villages are dormitories for people working in the conurbation. Reflection of the high ratio between wages and house prices. The Council needs to commission research from an appropriate consultant into the present situation now that the results of the 2011 census are fully available. Likely to have a profound effect on the question of what policies are appropriate to the district, i.e. the overall strategy for the Plan.	Comments noted. There are complex issues present within the Bromsgrove District in relation to travel to work areas and the status of Bromsgrove as a 'commuter town'. The BDP will seek to address these issues although to solve them will take many years and fundamental changes within the District. The Council are aware of the issues mentioned and will through planning policy seek to deliver opportunities that work towards addressing them.
VO2	11	Rosamund	Worrall	Historic England		The strategic objective SO8 in relation to the historic environment is welcomed.	Comments noted.
VO2	13			Natural England		We note that the objectives are the same as in the adopted Core Strategy. Whilst they are adequate, the Plan Review provides an opportunity to improve them.	Comments noted and agreed. The Objectives will be updated and improved where necessary.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO2	13			Natural England		SO8 covers both the natural and historic environment and focuses on appearance rather than functionality. We recommend separating out the two issues and placing an emphasis on the quality and functioning of the natural environment, which should be protected, restored and enhanced. We welcome the references to biodiversity and green infrastructure. Landscape is not currently mentioned in the objectives and needs to be.	Restored will be included within the Objective text. Further consideration will be given as to whether this Objective should be separated into two separate Objectives.
VO2	15	Fiona	McIntosh	North Worcestershire Water Management		Question whether SO10 could be expanded to include the use of sustainable drainage techniques.	It is more appropriate to refer to SuDS within Policy.
VO2	17	Stuart	Morgans	Sport England		The strategic objectives are supported, particularly SO6 (promoting walking and cycling), SO7 (healthy lifestyles), and SO11 (good design), and it is noted that these are carried over from the adopted plan. SO7 should be expanded to refer to the provision of social infrastructure (which includes sports and recreation facilities) required to enable people to live healthy lifestyles.	Comments noted and agreed.
VO2	18	Andrew	Morgan	Warwickshire and West Mercia Constabulary		WP and WMP support the inclusion of Strategic Objective 7 (SO7).	Comments noted.
VO2	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Recommend that you amend the first part of SO8 to read as follows: "Protect, restore and enhance ..." as many natural assets have been degraded in the past and could be a good focus for action.	Comments noted and agreed.
VO2	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Pleased to support SO8, SO9, SO10 - these three objectives begin to cover the need to protect and enhance the environment in line with planning guidance and duties under S.40 NERC Act .	Comments noted and agreed, the amendment will be made to SO8.
VO2	20	P	Harrison	Wythall Parish Council		Yes	Comments noted.
VO2	21	Martin	Dando	Birmingham City Council		Although it is listed as a Strategic Issue later on, we would suggest that the Strategic Objectives section also needs to acknowledge the need for co-operation between neighbouring Authorities in order to meet the overall housing and employment needs for the wider sub-region. Given the shortfalls in housing provision within the conurbation in particular and the need to meet the wider strategic requirements set out in the Greater Birmingham and Black Country SGS, co-operation with neighbouring authorities to meet wider development needs across the Housing Market Area should be acknowledged as a Strategic Objective.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO2	22	Carl	Mellor	Black Country Authorities		Feel that a strategic objective needs to be added which outlines the need to work together with neighbouring authorities, particularly within the conurbation, to ensure that wider housing and economic needs are considered within the plan to help meet any shortfalls which may arise from within the Black Country and wider conurbation.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO2	25	Gary	Palmer	Solihull Metropolitan Borough		The strategic objectives cover a wide range of issues that are important to the District. The strategic objectives should also include strategic cross-boundary matters that pertain to the Duty-to-Cooperate. Therefore, we would suggest that Strategic Objective 4 (Provide a range of housing types and tenures to meet the needs of the local population, including the special needs of the elderly and the provision of affordable housing) also includes reference to meeting the wider needs of the Housing Market Area, and/or an explicit strategic objective is added on working with the HMA and neighbouring authorities on strategic matters under the Duty to Cooperate	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO2	28	Emily	Barker	Worcestershire County Council		<p>Suggest expanding SO3 to include sustainability of schools &amp; nurseries.</p> <p>SO4 refers to the special needs of the elderly, but fails to recognise that there are special needs requirements among the wider adult and child population.</p> <p>Recommend that SO7 is amended to "Improve quality of life, sense of well being, reduce fear of crime, promote community safety and enable active, healthy lifestyles, for example by providing health-promoting environments and providing safe and accessible services and facilities to meet the needs of Bromsgrove District's residents."</p> <p>Support SO8 but suggest inclusion of "restore" alongside "protect and enhance" . Clarification needed whether the assets are "unique" or "distinctive"</p> <p>Sustainable Location should be defined in the glossary.</p> <p>Better links should be formed so that GI is more widely embedded to be genuinely multifunctional.</p> <p>Support inclusion of SO10 covering climate change and energy efficiency. Advise a prescriptive policy to support this.</p> <p>This objective should support a reduction in CO2 emissions and encourage the installation of renewable energy on new developments. The policy should require a full evidence base to be provided if a developer states the provision of 10% of the site energy from renewables is unviable.</p>	<p>It is acknowledged that schools and nurseries are an important part of ensuring that the appropriate infrastructure is in place, however listing schools and nurseries within this Objective would not be too detailed for broad Objectives.</p> <p>SO4 - It is agreed there are special needs housing is important, this will be considered further through detailed policy considerations.</p> <p>SO7 - it is considered SO7 reflects the suggested text.</p> <p>SO8 - Restore will be included in Objective text.</p> <p>Distinctive does not appear in SO8 text.</p> <p>Sustainable location will be included int the Glossary.</p> <p>With regard to GI these policy considerations will be considered further in the process.</p>
VO2	31	Rachel	Jones	Better Environment Theme Group		Support the objectives listed but feel that some of the terminology could be stronger, particularly feel the word 'encourage' is rather weak and should be 'we will' deliver, we will provide the policy tools to ensure that 'x' will happen.	Comments noted. As planning is a balance of issues it is not possible to commit to 'we will' as in some circumstances this may not be possible.
VO2	34	Sue	Baxter			Yes	Comments noted.
VO2	36	Conrad	Palmer	Fairfield Village community Association		Yes	Comments noted.
VO2	39	Andrew	Carter	Homes England		Whilst the strategic objectives are appropriate the inclusion of an objective which promotes the co-location of employment and housing where appropriate within new developments should be included. This would have the benefit of alignment with and support of Strategic Objective 6 which seeks to encourage sustainable modes of travel.	This is not appropriate as a Strategic Objective but more appropriate within Policies relating to economic development.
VO2	40	Fraser	Pithie	Shakespeare Line Promotion group		We wish to express strong support for the following Strategic Objectives- SO2, SO3, SO6 and SO12.	Comments noted.
VO2	41	Helen	Davies	Transport for West Midlands		A significant number of people residing within Bromsgrove also commute into the metropolitan area. Of the 37,289 employed population in Bromsgrove, 15,973 people (43%) commute into the West Midlands metropolitan area, of which 9,996 people (27%) commute into Birmingham. Compared to other districts outside of the metropolitan area, these figures are considerably high. Therefore based on these above points, TfWM believe that there are a number of transport principles that should be followed.	Comments noted and agreed. It is considered that it is a challenge for the BDP Review to consider how continued commuting from Bromsgrove can be addressed.
VO2	42			Wythall Residents Association		Yes	Comments noted.
VO2	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	<p>Particular support for SO2. However the objectives fail to reference the need to accommodate unmet housing needs arising from the GBHMA or identify that this is likely to be accommodated through the release of Green Belt land.</p> <p>Suggest inclusion of a new Strategic Objective as follows:</p> <p>" Sufficient housing will be delivered to meet the needs of the District over the Plan Period as well as contribute towards accommodating the unmet need arising from Birmingham City and Redditch District. Sufficient sites will also be safeguarded to maintain a supply of housing up to 2040."</p> <p>Considered that the wording of SO8 should be revised to take account of the need to release Green Belt sites for housing as follows:</p> <p>"In recognising the need to release Green Belt land for housing, the Council will seek to protect and enhance the unique character, quality and appearance of the historic and natural environment, biodiversity and Green Infrastructure..."</p> <p>These would ensure that the Plan is positively prepared.</p>	<p>Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.</p> <p>The Green Belt surrounding settlements will be considered in light of sites that are submitted through the 'call for sites' process.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO2	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>The one and only objective that makes reference to development and its distribution is SO2 Focus new development in sustainable locations in the District and as such does not attribute sufficient consideration to the material affects that the development pressures arising from outside the District will have on the Plan's ability to implement development within the Council area. It is advanced that the Strategic Objective should be amended to recognise that the Council is under duress to ensure that a satisfactory extent of land is identified to deliver the need arising within Bromsgrove, as well as meeting it statutory requirement through the Duty to Co-operate with other LPAs around the District. If the Objectives were to be added to, or amended, to include wording such as:</p> <p>"Ensure that sufficient land is identified to meet the needs of Bromsgrove District, as well as cross-boundary needs arising from neighbouring authorities in line with the Duty to Co-Operate, in suitable and sustainable locations."</p> <p>Recognition of this requirement will ensure that the Plan can appropriately and robustly approach the strategic growth issues that the Council faces and demonstrates that the requirement to co-operate with parties beyond the District boundary has been met. Furthermore, given that Bromsgrove falls outside of the West Midlands Combined Authority, but within the functional economic and housing market area, the District finds itself in a position where it must co-operate in a way that ensures the development can be met within its boundaries, but also that it does so compliantly with the law. Without sufficient and appropriate recognition of the strategic context and growth requirements in the wider region and its material impacts on the Plan and its implementation for growth, the Plan is unable to ensure that it can meet its obligations and stimulate sustainable and appropriate levels of growth over the new, extended Plan period.</p>	Comments noted and agreed. Add objective which considers wider housing and economic needs.
VO2	52	Tom	Ryan	Claremont Planning	Bellway Homes	<p>The one and only objective that makes reference to development and its distribution is SO2 Focus new development in sustainable locations in the District and as such does not attribute sufficient consideration to the material affects that the development pressures arising from outside the District will have on the Plan's ability to implement development within the Council area. It is advanced that the Strategic Objective should be amended to recognise that the Council is under duress to ensure that a satisfactory extent of land is identified to deliver the need arising within Bromsgrove, as well as meeting it statutory requirement through the Duty to Co-operate with other LPAs around the District. If the Objectives were to be added to, or amended, to include wording such as: "Ensure that sufficient land is identified to meet the needs of Bromsgrove District, as well as cross-boundary needs arising from neighbouring authorities in line with the Duty to Co-Operate, in suitable and sustainable locations."</p>	Comments noted and agreed. Add objective which considers wider housing and economic needs.
VO2	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	<p>The Strategic Objectives should be amended to include reference to development pressures from beyond the District boundary.</p> <p>SO2 'Focus new development in sustainable locations in the District' does not attribute sufficient consideration to the material affects that the development pressures arising from outside the District will have on the Plan's ability to implement development within the District. The Strategic Objective should be amended to recognise that the Council is under duress to ensure that a satisfactory extent of land is identified to deliver the need arising within Bromsgrove, as well as meeting it statutory requirement through the Duty to Co-operate with other LPAs around the District. The Objectives should be added to, or amended, to include wording such as:</p> <p>"Ensure that sufficient land is identified to meet the needs of Bromsgrove District, as well as cross-boundary needs arising from neighbouring authorities in line with the Duty to Co-Operate, in suitable and sustainable locations."</p> <p>Recognition of this requirement will ensure that the Plan can appropriately and robustly approach the strategic growth issues that the Council faces and demonstrates that the requirement to co-operate with parties beyond the District boundary has been met.</p>	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO2	54	Katherine	Else	Claremont Planning	Miller Homes	It is advised that the Strategic Objective should be amended to recognise that the Council is under duress to ensure that a satisfactory extent of land is identified to deliver the need arising within Bromsgrove, as well as meeting it statutory requirement through the Duty to Co-operate with other LPAs around the District. If the Objectives were to be added to, or amended, to include wording such as: "Ensure that sufficient land is identified to meet the needs of Bromsgrove District, as well as cross-boundary needs arising from neighbouring authorities in line with the Duty to Co-Operate, in suitable and sustainable locations." Therefore, it is advised to that and amended strategic objective could better provide specifics in terms of what goals should be achieved through the new Local Plan, especially in the context of the development pressures facing the District.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO2	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	The Strategic Objectives listed as S01 to S012 would also be strengthened by the inclusion of an additional objective to work with neighbouring local authorities to ensure development takes place in the most sustainable locations taking into account strategic infrastructure, environmental constraints and the geography of the wider area.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO2	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	The overall vision for Bromsgrove as stated on page 12 (para 2.3) is supported. It is, however, suggested that the Strategic Objectives could be improved in the following ways: <ul style="list-style-type: none"> <li>• "identify land to accommodate the remainder of the adopted Bromsgrove District Plan housing requirement to 2030;</li> <li>• help to deliver the unmet housing needs of the Greater Birmingham area, and;</li> <li>• look beyond 2030 to identify land needed to deliver the full range of needs for the District over the longer term."</li> </ul> Given the central importance of these three requirements to the plan review, and the clarity that they provide over the level of growth to be accommodated in the plan review, it is strongly suggested that the three points above are included within the strategic objectives of the Local Plan.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO2	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	We suggest reference should also be made in the Strategic Objectives to contributing to meeting the needs of the Birmingham and Black Country Housing Market Area, accepting the requirements of the NPPF in respect of cross-boundary co-operation beyond the district boundary. Although this is identified separately as Strategic Issue 5, it should be recognised as a key objective for the Plan.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO2	72	Stephen	Peters			Yes	Comments noted.
VO2	76	Emily	Vyse	GVA	University of Birmingham	We agree with the Strategic Objective's identified and consider them to be appropriate to deliver the Plan's Vision. As above however, we consider that reference needs to be made to the need to work collaboratively with neighbouring authorities as part of the duty to cooperate. We agree with SO2 which is to "focus new development in sustainable locations in the District". However we feel it important to clarify that in order to achieve this, it may be necessary to provide for development immediately adjacent to the Birmingham conurbation which is both a highly sustainable location for development and where a substantial amount of the area's need for housing arises.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO2	80	John	Pearce	Harris Lamb	Bloor Homes	Generally we agree with the strategic objectives that have been set out. We would, however, like to proposed additional wording to SO2: SO2 Focus new development in sustainable locations in the District, as well as in sustainable locations adjacent to the existing built up edge of Birmingham.	The suggested wording is considered to be too specific for inclusion.
VO2	87			Indenture		Yes. Client's land would particularly meet with Strategic Objectives SO2 and SO11.	Comments noted.
VO2	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	Taylor Wimpey consider Strategic Objectives 1, 2, 3, 7, 9, 10 and 12 are appropriate.	Comments noted.
VO2	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	Strategic Objective 4, given the expectation that Bromsgrove District Council will be required to accommodate unmet housing needs from the wider West Midlands area, Taylor Wimpey would suggest that reference to "the local population" in Strategic Objective 4 should be amended to read "the future population". This minor alteration will provide important clarity in respect of the expectation that sufficient housing should be provided to accommodate in-migrants to the area, as well as the existing local population and that the accommodation of unmet needs from adjoining authorities is entirely appropriate and consistent with the approach set out in the NPPF.	The needs of the wider housing market area will be addressed through a separate objective.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO2	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	In considering the special housing needs of particular groups, Bromsgrove District Council should seek to avoid any situation whereby its objective of meeting the high levels of housing need for specific population groups serves to reduce the overall level of housing need to such a level that it cannot meet the general housing needs for the current and future local population. Strategic Objective 4 would also benefit from additional clarity in this regard.	It is agreed that the needs of the local population are important, both current and future population. The District Plans needs to ensure all needs (local and wider, where necessary) are addressed appropriately through the plan. It is considered an additional Objective which considers the need of the wider population is included, which may assist in providing clarity in this regard.
VO2	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	Strategic Objective 5, although the Standard Methodology for assessing housing need does not make any adjustment to the household projections to reflect employment projections, the PPG is clear that local planning authorities are at liberty (and are encouraged) to apply a higher figure, for example where growth strategies are in place. In addition, paragraph 81(c) of the NPPF states that planning policies should “seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment”. Whilst Taylor Wimpey does not object to Strategic Objective 5, it is clear that careful consideration must be given to ensuring that the housing requirement contained within the emerging Bromsgrove District Plan does not undermine the economic wellbeing of the area and the potential for economic growth.	It is agreed that careful consideration will need to be had to the appropriate housing requirement to be contained within the District Plan.
VO2	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	Strategic Objective 6, support this Strategic Objective as an appropriate aspiration for Bromsgrove which will create safe and convenient ways for everyone to access jobs, opportunities and amenities. The prompt integration of more sustainable modes of travel can be achieved through the planning and promotion of sustainable urban extensions.	Comments noted.
VO2	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	Strategic Objective 8, Taylor Wimpey supports this Strategic Objective, which can be achieved despite the need to release Green Belt land, as suggested within Issues and Options consultation document. Because Bromsgrove town and the large settlements are tightly bounded by the Green Belt, there is nowhere else for future development to go. Policy BDP4 commits the Council to a full review of the Green Belt and this approach was found to be sound at the examination into the BDP.	Comments noted.
VO2	90	Owen	Jones	LRM Planning	Persimmon Homes	We agree with the strategic objectives listed in paragraph 2.5; in particular the continued regeneration of Bromsgrove Town Centre, focusing new development in sustainable locations in the District; providing a range of housing types and tenures to meet the needs of the population; and encourage more sustainable modes of travel. Taken together, these objectives heighten the importance of locating new development in areas well served by public transport and close to existing facilities and services.	Comments noted.
VO2	94			Nigel Gough Associates	Aniston Ltd	Yes. The parcel of land would meet Objectives SO2 and SO11.	Comments noted.
VO2	95			Nigel Gough Associates	Monksgraston Ltd	Yes we believe Bromsgrove DC have identified appropriate strategic objectives.  The subject parcel of land would particularly meet Strategic Objectives SO2 in focusing new development in sustainable locations.	Comments noted.
VO2	96			Nigel Gough Associates	Mr Stapleton	Yes, appropriate Strategic Objectives have been identified.	Comments noted.
VO2	96			Nigel Gough Associates	Mr Stapleton	The land referred to particularly meets Strategic Objective SO2 in focusing new development in a sustainable location.	Comments noted.
VO2	96			Nigel Gough Associates	Mr Stapleton	The land referred to would meet Strategic Objective SO11, where high quality design could be delivered.	Comments noted.
VO2	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	Yes we believe BDC have identified appropriate strategic objectives. The subject parcel of land would particularly meet SO2 and SO11.	Comments noted.
VO2	98	Sally	Oldaker			SO6: It will take a long time for a modal shift to happen – in the meantime, what on earth are you going to do about the current traffic issues, which will only get worse as more houses are built?	The Planning System is only able to consider the implications of future development and ensure that highways are able to appropriately deal with predicted traffic, relying on the highways authority (WCC) for this information. The District Plans seeks to ensure that more sustainable modes of travel are accessible and development is located in the appropriate places to reduce the need to travel. Infrastructure will be addressed as part of the plan making process before any new development is proposed.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO2	99	Mark	Dauncy	Pegasus	Gallagher Estates	The wording of SO4 should be broadened to include not only meeting the needs of the local population but also housing needs arising from the neighbouring authorities. The Local Plan is clear that Bromsgrove has a duty to co-operate on cross boundary planning issues, yet the proposed objectives don't reflect this.	Comments noted. It is agreed that some wording could be included which refers to the development of Bromsgrove and its wider position.
VO2	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Broadly agree with the Strategic Objectives that have been set out. We do consider that SO4 should be reworded as follows: "To provide sufficient market housing that results in a stabilisation of house prices, genuinely meeting affordable housing need and addressing special housing need for people with disabilities and older people."  Strategic objective SO5 lacks reference to the provision of new employment land, which should form part of the objective.  Strategic objective SO12 should include reference to decision taking as well.	The range of tenures covers the affordable housing element of the comment. The District Plan is very limited in what it can do with regard to house prices. The most influential way the Plan can assist with house prices is through ensuring an appropriate provision of housing in the District.
VO2	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	We broadly agree with the Strategic Objectives that have been set out. We do consider that SO4 should be reworded as "To provide sufficient market housing that results in a stabilisation of house prices, genuinely meeting affordable housing need and addressing special housing need for people with disabilities and older people."	The planning system has no control over house prices.
VO2	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Strategic objective SO5 lacks reference to the provision of new employment land, which should form part of the objective.	Agreed. Further wording to be included which includes reference to the future provision of employment land.
VO2	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Strategic objective SO12 should include reference to decision taking as well.	It is not considered appropriate to include reference to decision taking in this Objective.
VO2	112	Gareth	Sibley	RCA Regeneration	Piper Group	Broadly agree but consider that SO4 should be reworded as follows: "To provide sufficient market housing that results in a stabilisation of house prices, genuinely meeting affordable housing need and addressing special housing need for people with disabilities and older people. " SO5 lacks reference to the provision of new employment land SO12 should include reference to decision taking as well.	The planning system has no control over house prices.  Agreed. Further wording to be included which includes reference to the future provision of employment land.  It is not considered appropriate to include reference to decision taking in this Objective.
VO2	113	Gareth	Sibley	RCA Regeneration	CAD Square	We broadly agree with the Strategic Objectives that have been set out. We do consider that SO4 should be reworded as follows: "To provide sufficient market housing that results in a stabilisation of house prices, genuinely meeting affordable housing need and addressing special housing need for people with disabilities and older people." Strategic objective SO5 lacks reference to the provision of new employment land, which should form part of the objective. Strategic objective SO12 should include reference to decision taking as well.	The planning system has no control over house prices.  Agreed. Further wording to be included which includes reference to the future provision of employment land.  It is not considered appropriate to include reference to decision taking in this Objective.
VO2	115	John	Breese	Rosconn Strategic Land		Generally support the Strategic Objectives for the District, particularly objectives S02, S04 and S06.  S02 relays the central purpose of the National Planning Policy Framework 2018 (NPPF) to promote sustainable development and to do so in the right locations. The identification of sustainable locations will be shaped by the overall spatial strategy chosen by the Council, which we would consider to be a broadly similar distribution to that of the existing Bromsgrove District Plan 2011-3030 spatial strategy by focusing the majority of new development at the Main Town of Bromsgrove and the Large Settlements.  S04 is also supported by NPPF paragraphs 59-61, which seeks to ensure that different sizes, types and tenures of housing for different groups is reflected in planning policies in the context of a sufficient amount and variety of land coming forward to meet the local housing need.  S06 is clearly supported by Section 9 of the NPPF which directs that significant development should be focused on locations which are or can be made sustainable through offering a genuine choice of transport modes to help minimise the negative environmental impacts of travel.  Consider it is appropriate to add an additional Strategic Objective to "meet the unmet needs of neighbouring authorities". This a strategic issue and is a commitment within the existing Bromsgrove District Plan so should be a Strategic Objective of the Local Plan Review.	Comments noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO2	120	Michael	Davies	Savills	Cala Homes	The strategic objectives fail to demonstrate how BDC will aid with the pressures arising from the GBHMA shortfall. Consider it is important for Bromsgrove to include a strategic objective that reflects the District's commitment to meet their own housing needs and the wider HMA's. Amend SO4 to also include the needs of the wider HMA, to provide more clarity on Bromsgrove's commitment to meet their own OAN and the wider HMA. Consider that Green Belt land around settlements is the most sustainable and Green Belt land in these locations should be considered for release; above Green Belt land that is secluded in order for SO2 to be met.	Comments noted. It is considered that further wording could be included which refers to wider housing need. The Green Belt surrounding settlements will be considered in light of sites that are submitted through the 'call for sites' process.
VO2	122	Michael	Davies	Savills	Landowners	<p>We consider that the strategic objectives set out on page 13 of the Issues and Options document fail to demonstrate how BDC will deal with the Greater Birmingham HMA housing shortfall. Although the HMA shortfall has yet to be distributed between the HMA authorities it is considered that once the housing figures are confirmed, this is likely to increase Bromsgrove's housing requirement. This could result in the need for a review of the Strategic Objectives. As such, we consider it is important for Bromsgrove to include a strategic objective that reflects the District's commitment to meet their own housing needs and the wider HMA's.</p> <p>Strategic Objective SO2 aims to focus new development in sustainable locations in the District. We consider that in accordance with paragraph 11 of the revised NPPF, the Council should focus new development in areas which can deliver a sustainable development. All of the settlements within BDC are surrounded by Green Belt. We consider that Green Belt land around existing settlements is the most sustainable and Green Belt land in these locations should be considered for release; above Green Belt land that is isolated, in order for Strategic Objective SO2 to be met.</p> <p>Strategic Objective SO4 states that Bromsgrove District aims to "provide a range of housing types and tenures to meet the needs of the local population, including the special needs of the elderly and the provision of affordable housing". We consider this objective should be amended to also include the needs of wider HMA, in order to provide more clarity on Bromsgrove's commitment to meeting their own OAN as well as the wider HMA shortfall.</p>	<p>Comments noted. It is considered that further wording could be included which refers to wider housing need.</p> <p>The Green Belt surrounding settlements will be considered in light of sites that are submitted through the 'call for sites' process.</p>
VO2	123	Michael	Burrows	Savills	Landowners	The Strategic Objectives fail to demonstrate how BDC will deal with the Greater Birmingham HMA housing shortfall. At the point that the Birmingham Development Plan was adopted there was an identified shortfall of 37,900 dwellings which would need to be distributed across the HMA authorities. Although the HMA shortfall has yet to be distributed between the HMA authorities it is considered that once the housing figures are confirmed, this is likely to increase Bromsgrove's housing requirement. This could result in the need for a review of the Strategic Objectives. As such, it is considered important for Bromsgrove to include a strategic objective that reflects the District's commitment to both meet their own housing needs and those of the wider HMA. Strategic Objective SO4 states that Bromsgrove District aims to "provide a range of housing types and tenures to meet the needs of the local population, including the special needs of the elderly and the provision of affordable housing". It is considered that this objective should be amended to also include the needs of wider HMA, in order to provide more clarity on Bromsgrove's commitment to meeting their own OAN as well as the wider HMA shortfall. NPPF paragraph 35 confirms that Local Plan should be based on effective joint working on cross boundary and strategic matters that have been dealt with rather than deferred.	Comments noted and agreed. Add objective which considers wider housing and economic needs.
VO2	123	Michael	Burrows	Savills	Landowners	Strategic Objective SO2 is supported. BDC should focus new development in areas which can deliver a sustainable development. All of the settlements within BDC are surrounded by Green Belt. It is considered that Green Belt land around existing settlements is the most sustainable and therefore Green Belt land in these locations should be considered for release, above Green Belt land that is isolated, in order for Strategic Objective SO2 to be met.	Comments noted. A Green Belt Assessor will take place which will consider development sites against the Green Belt purposes. However, development locations will be suggested in the plan that consider more than Green Belt considerations.
VO2	124	Robert	Lofthouse	Savills	Taylor Wimpey	We acknowledge the Strategic Objectives outlined in the Issues and Options. The Perryfields development is closely aligned with these in delivering new homes, employment and community facilities in a sustainable location; providing a range of house types and tenures to meet future needs; supporting economic growth; and being well integrated to sustainable transport links.	Comments noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO2	125	Alastair	Thornton	Simply Planning	Woodpecker Plc	Our client is generally supportive of the Strategic Objectives. Strategic Objective 2 which seeks to focus new development in sustainable locations and Strategic Objective 4, which encourages a range of housing types and tenures. Clearly, the focus of the Government's National Planning Policy Framework (NPPF) is very much one of delivering sustainable growth. Naturally, this places an importance on locating development either within, or adjacent to, existing settlement boundaries. In terms of appropriate topics considered on Page15 we would suggest that the issue of the Green Belt Review potentially warrants an individual topic area in its own right. The importance of the Green Belt and subsequent review is highly important within Bromsgrove given in the region of 90% of all land within the District is designated Green Belt.	Not sure if Green Belt should have its own Objective?
VO2	134	David	Barnes	Star Planning	Richborough Estates	An explicit Strategic Objective should be meeting the housing needs not only of the local population but also a significant share of those needs associated arising within the Birmingham and the Black Country Housing Market Areas. This would be consistent with Strategic Issue 5. There is also the likelihood that the Local Pan will need to consider meeting some of the housing need associated with Redditch Borough. To ensure that the Strategic Objective is explicit, it would be appropriate for SO4 to be amended to: 'Provide a range of dwelling types and tenure to meet local and wider housing needs, including.....'	Comments noted. It is considered that further wording could be included which refers to wider housing need.
VO2	136	Kathryn	Young	Turley	Land Fund	Land Fund consider the Strategic Objectives to provide a good foundation to help the Council deliver its Vision.  Our client supports in part the Council's recognition at SO2 that new development should be focussed in sustainable locations in the District. Hagley is large settlement in the District and benefits from sustainable transport links to Birmingham and the wider West Midlands conurbation. In order that the strategic objective links to the Council's adopted spatial strategy it is requested that SO2 is reworded as: "SO2 Focus new development in sustainable locations in the District <b>in accordance with the Council's spatial strategy</b> (NEW TEXT)"	Agree with SO2.
VO2	136	Kathryn	Young	Turley	Land Fund	The acknowledgement in SO4 that "a range of housing types and tenures" are needed to meet the needs of the local population is welcomed. However, it is recommended that the strategic objective is not narrowed to focus on the "local population" only.  The policy should be reworded as "SO4 Provide a range of housing types and tenures [to meet the needs of the local population] STRIKETHROUGH, including the special needs of the elderly and the provision of affordable housing"	
VO2	136	Kathryn	Young	Turley	Land Fund	A specific additional strategic objective should be included which acknowledges the District's relationship with its neighbouring authorities. The policy should be worded as:  "SO13 Assist authorities within the Greater Birmingham Housing Market Area meet their current housing land supply shortfall" (NEW TEXT)	Comments noted. It is considered that further wording could be included which refers to wider District's relationship with neighbouring authorities.
VO2	137	Matthew	Fox	Turley	Redrow Homes	Redrow consider that the Strategic Objectives are appropriate to deliver the Plan's Vision. Particular emphasis is needed on delivering a suitable provision of housing within the District in sustainable locations, as captured by SO 2 and SO 4.  The acknowledgement in SO 4 that a range of housing types and tenures are needed to meet the needs of the local population is welcomed. However, the reference to "local population" in SO 4 implies that the District will only be meeting the needs of the existing population, whereas the LPR is also required through an adopted policy (BDP4.2) as well as national policy to assess how it can make an appropriate contribution to help to address the broader HMA shortfall. As one of the most important issues which the LPR must address we suggest this is made explicit in the Strategic Objectives.	Comments noted. It is considered that further wording could be included which refers to wider housing need.
VO2	161	Ian	Macpherson		Self	Yes	Comments noted.
VO2	171	Mark	Cooper			They all sound great, but they don't align with the vision because the latter doesn't tell me what Bromsgrove is or aspires to be. When you ask people their thoughts about Bromsgrove they don't think of the Lickey Hills, or Clent Hills, other areas of beauty or smaller hamlets such as Catshill, Barnt Green or Alvechurch, but they focus on one thing - the town centre.	It is agreed there a range of areas within the wider District of Bromsgrove are they are unique in character. However due to the nature of the Strategic Objectives it may not be necessary to make reference to these areas.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
VO2	171	Mark	Cooper			Bromsgrove needs a brand that is defined by its vision and is clear and easy to communicate and deliver. The 12 strategic objectives are individually sound, but don't all come together to build and deliver the overall image of Bromsgrove into the 2nd half of the 21st Century. For me, of the stated objectives, the most important are SO1, SO8, SO7 and SO3.	There is a Vision for the Plan and the Strategic Objectives are in places to, alongside the Policies, deliver the Vision of the plan.
VO2	171	Mark	Cooper			Can't see in the objectives any references to leisure and education, or to the growing support required to help those with mental health issues - which is an area that continues to grow as one of the biggest challenges in 21st century UK.  The other observation I would make all hinges on what you want Bromsgrove to be - if it's a commuter town, then (e.g.) you can remove to an extent SO5 but focus more on SO6 and SO2.	Objective SO7 refers to sense of well-being and enabling an active healthy lifestyle. Further consideration will be given to reference to education.  Comments noted, the direction of the plan will be informed by evidence and responses to consultation exercises.
VO2	174	Michael	Corfield			Strategic Objectives are in the wrong priority. SO8 and SO9 should be at the top of the list.	Objectives are not listed in a priority order.
VO2	193	Tony	Helliwell	Hagley Neighbourhood Plan Working Group		Support strategic objectives but feel that they do not address major existing problems. We can find no mention in the Strategic Objectives of a desire to solve existing traffic problems or to ensure that further development doesn't worsen these problems.	The Planning System is only able to consider the implications of future development and ensure that highways are able to appropriately deal with predicted traffic, relying on the highways authority for this information. The District Plans seeks to ensure that more sustainable modes of travel are accessible and development is located in the appropriate places to reduce the need to travel .
VO2	193	Tony	Helliwell	Hagley Neighbourhood Plan Working Group		For infrastructure issues this plan should be developed with other local authorities. It is clear that developments in Wyre Forest will have an impact on Hagley as the new residents commute to work in Birmingham, Dudley or the Black Country, or access the M5. Car parking policies also need to be consistent at railway stations, Kidderminster charges for parking and Hagley Station doesn't. The only appropriate method is a joint approach across all neighbouring authorities. Agree that development should be in sustainable locations but issues are not often fully addressed. A complete redesign of the A456/B4187 junction remains an essential requirement. Virtually no facilities for cyclists in Hagley , any further development should give due consideration to this. Noise and air pollution deters cyclists. As the relative proportion of elderly residents living in Hagley is increasing we should be encouraging people to walk and improve their health.	It is essential that infrastructure is delivered in a comprehensive manner. Infrastructure providers are engaged in the Plan Review and are aware of the requirements and the scope of the plan review.
<b>Q.IO1: Do you think we have identified all appropriate topics? If not, what have we missed?</b>							
IO1	2	Gill	Lungley	Barnt Green Parish Council		'Town Centre' should be changed to 'Town and Local Centres'.	Comments noted and agreed.
IO1	5	Kevin	Joynes	Beoley Parish Council		Should include waste management and recycling, a long term effective solution needs to be found.	Waste management and recycling would fall within the topic of 'Climate Change'.
IO1	11	Rosamund	Worrall	Historic England		It is noted that the Natural and Historic Environments are considered together as a topic in the draft Plan but welcome the fact that the SA keeps the two separate for assessment purposes. It is recommended that this approach be continued through the Plan process since the natural and historic environments are very different despite there being strong synergies between the two.	Comments noted
IO1	13			Natural England		Yes. We welcome the inclusion of the Natural and Historic Environment, Climate Change and Water Resources. We would prefer it if the natural environment could be included as a separate topic.	Comments noted
IO1	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Recommend an additional topic of "Green Infrastructure" as this fits well with the county strategy for GI and would ensure that plan decisions taken are viewed holistically across multiple disciplines. THE GI Implications of choices made should be seen as an overarching consideration in all planning decisions. The GI capacity of the District underpins (and can be enhanced/degraded by) development sustainability and should be seen as a key element of plan delivery. GI could form a standalone issue or potentially fall within Strategic Issue 2.	Green Infrastructure currently falls within the topic of 'Social Infrastructure', it further stages of plan production the location of the sub-topic may alter. It is agreed that Green infrastructure is a key element within the District Plan.
IO1	27			Stratford On Avon District Council		Increasing demands for energy and adequate telecommunications infrastructure present issues with cross boundary implications. The consultation document is silent on the issue of 'hard' infrastructure in this respect.	Energy is referenced a number of times through the Issues and Options document, as it is agreed this is an issue that continually needs addressing, there will be further regard to renewable energy at subsequent stages of plan production. With regard to telecommunications, Paragraph 6.26 entitled 'Telecommunications' focusses on this issue, both hard and soft requirements. It is agreed that a number of issues have cross boundary implications, these will be addressed in due course.
IO1	36	Conrad	Palmer	Fairfield Village community Association		YES	Comments noted

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IO1	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Support the range of topics identified at paragraph 3.1.	Comments noted.
IO1	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	YES	Comments noted
IO1	80	John	Pearce	Harris Lamb	Bloor Homes	Meeting the needs of the District as well as contributing to meeting a proportion of the unmet needs of Birmingham is central to the preparation and content of the emerging Plan. Whilst we fully expect this to be addressed in the Plan, we feel that a specific section should have been included that looks at how the Council intend to address these very important cross boundary issues. As such, we would suggest that a further topic should have been included that looks at how the Plan will address the Birmingham overspill issue.	It is acknowledged and agreed that cross-border working with Birmingham is an important topic and will be address through Plan preparation. It is considered that the outcomes of working with neighbouring Local Authorities would sit within 'Housing' or 'Employment' with regard to topics, however, if deemed necessary this issues will be addressed by a separate policy within the Plan.
IO1	92	Andrew	Watt	Maze Planning Solutions	Client	There is no mention of renewable energy as a topic for the Local Plan Review. That subject matter could be covered under the existing of 'Climate Change and Water Resources' or be a standalone topic. It is key component of sustainable development.	Energy is referenced a number of times through the Issues and Options document, as it is agreed this is an issue that continually needs addressing, there will be further regard to renewable energy at subsequent stages of plan production.
IO1	99	Mark	Dauncy	Pegasus	Gallagher Estates	Broadly supportive.	Comments noted.
IO1	161	Ian	Macpherson		Self	Yes	Comments noted.
<b>Q.SI1 Are there other Strategic Issues we need the Plan Review to address?</b>							
SI1	1	Tammy	Williams	Alvechurch Parish Council		It's suggest an extra strategic issue could be ...Strategic Issue 6; Co-operating with adopted Neighbourhood Plans (NPs) to address the wider local development needs and issues of their Designated Area through the allocation of housing requirements.	Noted. Neighbourhood planning will remain a key consideration in how development needs are delivered in suitable and sustainable locations across the District as per strategic objective SO2. The emerging BDP Review consultation document will include appropriate coverage of the interrelationship between neighbourhood plans and the emerging District Plan Review.
SI1	2	Gill	Lungley	Barnt Green Parish Council		Strategic Issue 2 should not just be growing the economy, but also include sustaining it. Developing transport infrastructure should be a strategic objective.	Noted. The intention of strategic issue 2 was to consider the local economy in the long term, and therefore whether growth will enable a sustainable local economy well beyond the duration of the plan period. With regards to developing transport infrastructure, strategic objective SO6 refers to promoting a more integrated sustainable transport network to facilitate more walking, cycling and public transport usage. However it is accepted that reference could be made within this objective to all forms of transport infrastructure.
SI1	6	Rebekah	Powell	Catshill and North Marlbrook Parish Council		Greater attention needs to be given to the strategic impacts of major developments within the District. Particular attention was drawn to the likely adverse effect of the Perryfields development on Bromsgrove's infrastructure, especially transportation.	Noted. Agreed that the issue of development and transport infrastructure, including opportunities for investment or improvement schemes, should be referred to as part of the strategic objectives for the District Plan Review.
SI1	7	Mark	Davies	Environment Agency		Strategic issues will need to be informed by evidence to indicate possible issues in the broad locations of potential growth identified at this stage. Environmental Infrastructure improvements may be necessary as an outcome of the WCS and SFRA work.	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, in particular once preferred options for site allocations and growth locations are consulted on. This will include consideration of green and environmental infrastructure, including flood risk management and water supply/treatment issues.
SI1	9	Alexandra	Burke	Hagley Parish Council		Research needs to be undertaken to verify (or deny) the validity of the issues raised under the vision.	Noted. A comprehensive and proportionate evidence base will inform the Plan Review.
SI1	11	Rosamund	Worrall	Historic England		Historic England considers the strategic issues set out in Para 4.3 to be appropriate and sufficient in respect of the historic environment.	Noted.
SI1	13			Natural England		Natural England strongly recommends that the plan recognises the environment as a strategic issue. The National Planning Policy Framework (NPPF) states that Plans should "take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries" (paragraph 171). Moreover, the revised NPPF is intended to align more closely with the Government's 25 Year Environment Plan, the goals of which cannot be achieved without action through the planning system. We would support the inclusion of Green infrastructure as an overarching strategic topic.	Noted. The importance and value of the natural environment, biodiversity and green infrastructure of Bromsgrove District is recognised in Strategic Objective SO8 of the Plan Review. The content of the Plan Review should be in line with these strategic objectives in order to seek to deliver the overarching vision of the plan.



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SI1	17	Stuart	Morgans	Sport England		Sport England considers that the provision of social infrastructure (including Sports and Recreation Facilities) to meet the needs of the planned housing growth should be included within the main strategic issues for the Plan Review in order to accord with paragraph 20 of the NPPF. Paragraph 20 of the NPPF sets out that strategic policies should set out an overall strategy for the pattern, scale, and quality of development and make provision for leisure uses (part a of the policy) and community facilities, which would include sports and recreation facilities (part c of the policy).	Noted. The intention of Strategic Objective SO7 is to deal with the provision of social infrastructure, including sports, leisure and recreation facilities, however it is agreed that a more explicit reference could be made to this type of facility within this objective.
SI1	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Recommend that biodiversity and the natural environment be considered as a Strategic Issue. At present there is a risk that this importance may be underplayed in the emerging plan. This would help to balance decision making and could deliver better development outcomes. Also a good case to be made for GI being included in the strategic issues for Bromsgrove Topic as GI should be seen as an overarching element of all planning decisions.	Noted. The importance and value of the natural environment, biodiversity and green infrastructure of Bromsgrove District is recognised in Strategic Objective SO8 of the Plan Review. The content of the Plan Review should be in line with these strategic objectives in order to seek to deliver the overarching vision of the plan.
SI1	20	P	Harrison	Wythall Parish Council		NO.	Noted.
SI1	27			Stratford On Avon District Council		Reference to co-operation with the conurbation is welcomed, but there is a lack of reference to other neighbouring authorities. Would suggest an additional strategic objective setting out that Bromsgrove will co-operate with neighbouring authorities on cross-boundary matters as appropriate.	Noted. The strategic issue concerning co-operating with the West Midlands conurbation will be broadened to include co-operation with other neighbouring authorities in the formulation and implementation of the Plan Review.
SI1	28	Emily	Barker	Worcestershire County Council		Suggest that the need for a healthy environment, capable of supporting the economic and cultural development which the plan aspires to deliver, should be a Strategic Issue to ensure these services aren't undermined. Consultation with the CCGs should be carried out to ensure there is provision for an increased population.	Noted. Issues concerning the need for a healthy environment are covered in Strategic Objective SO7, which seeks to deal with health and well-being, community safety, and active lifestyles as a means of delivering the vision for the Plan Review. Social Infrastructure providers such as CCGs have been consulted at Issues and Options stage and will continue to be consulted throughout the formulation of the plan.
SI1	34	Sue	Baxter			No	Noted.
SI1	35	Peter	King	Campaign to Protect Rural England		SI.1 Evidence should be sought to deny or verify the case set out above under Vision	Noted. A comprehensive and proportionate evidence base will inform the Plan Review.
SI1	36	Conrad	Palmer	Fairfield Village community Association		Strategic Issue 3 to include "and affordability provision"	Noted. The title of this strategic issue uses the term 'rebalancing the housing market...' which is intended to address issues of housing affordability.
SI1	42			Wythall Residents Association		No	Noted.
SI1	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Support the range of issues identified, in particular the emphasis on housing growth, plan period and land use allocation. Whilst it is appreciated that membership of the WMCA is not a matter of soundness for the emerging District Plan, it reiterates the need for meaningful discussions to take place with adjoining authorities to ensure that all cross boundary issues are suitably addressed and dealt with through the SOCG process.	Noted.
SI1	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	NO	Noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI1	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>Whilst Strategic Issue 5 refers to co-operation with the West Midlands Conurbation to address development needs, there should be greater emphasis on the spatial characteristics in how this need will be addressed. Co-operation along with the wider region will not be sufficient in ensuring that unmet needs can be accommodated for and therefore, the strategic issue should provide greater emphasis on that this co-operation is vital in ensuring that needs of all LPAs in the region can be met through robust identification of sites that can contribute towards meeting this cross-boundary need and alleviating the development pressures. Furthermore, given that Bromsgrove has historically prepared its Plan alongside Redditch, there are links between the councils that should be acknowledged and as such the cross-boundary dimension of development between the two Councils must not be ignored and should also be included as a strategic issue with granted due consideration. Whilst this acknowledgement will ensure that the existing, and historical, linkages are maintained to demonstrate a component of the duty to co-operate, this should not prejudice the other objectives of the Plan to maintain sufficient co-operation in general, rather it should form part of the list of objectives, or form part of SO5 such as;</p> <p>“Co-Operating with the West Midlands Conurbation, as well as other neighbouring authorities such as Redditch, to address wider development needs”</p> <p>Strategic Issue 3 is supported by Spitfire Homes in that the current housing market does not cater well for a wide section of society and as such requires intervention to ensure that the right homes, in the right places, are built. It is advanced, therefore that the sites under control by Spitfire Homes are able to demonstrate as to what strategy the LPA should select in terms of distributing new housing growth to counter the obtuse housing market, whilst not unique to Bromsgrove, which acts an obstacle to socially and economically sustainable growth. Re-balancing the housing market therefore needs to be reflexive and ensure that housing growth takes into appropriate account the locational contexts and spatial qualities that dictate how the housing market is conceived in practice. Whilst this may not be totally appropriate to include in this part of the emerging Plan, Strategic Issue 3 could be amended to state;</p> <p>“Re-balancing the housing market through housing growth that is directed towards sustainably and suitable areas as identified through, and is compliant with, the Local Plan”</p>	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI1	52	Tom	Ryan	Claremont Planning	Bellway Homes	<p>Claremont Planning, on behalf of Bellway Homes, support the existing strategic issues and identified in the emerging Local Plan Review, but advance that they do not go far enough in assessing the development pressures in the District from the wider region. Whilst Strategic Issue 5 refers to co-operation with the West Midlands Conurbation to address development needs, there should be greater emphasis on the spatial characteristics in how this need will be addressed. Co-operation along with the wider region will not be sufficient in ensuring that unmet needs can be accommodated for and therefore, the strategic issue should provide greater emphasis on that this co-operation is vital in ensuring that needs of all LPAs in the region can be met through robust identification of sites that can contribute towards meeting this cross-boundary need and alleviating the development pressures.</p>	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI1	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	<p>The Strategic Issues do not go far enough in assessing the development pressures in the District from the wider region.</p> <p>Strategic Issue 5 - There should be greater emphasis on the spatial characteristics in how this need will be addressed. Co-operation along with the wider region will not be sufficient in ensuring that unmet needs can be accommodated and therefore, the strategic issue should provide greater emphasis that this co-operation is vital in ensuring that needs of all LPAs in the region can be met through robust identification of sites that can contribute towards meeting this cross-boundary need and alleviating the development pressures.</p> <p>Furthermore, given that Bromsgrove has historically prepared its Plan alongside Redditch, there are links between the councils that should be acknowledged and as such the cross-boundary dimension of development between the two Councils should also be included as a strategic issue which should be granted due consideration. As such, the strategic objectives do not provide a justified basis in ensuring that the Duty to Co-Operate is met given the historical linkages between Bromsgrove and Redditch are acknowledged.</p> <p>Reword Strategic Issue 5: “Co-Operating with the West Midlands Conurbation, as well as other neighbouring authorities such as Redditch, to address wider development needs”</p>	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI1	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	<p>Strategic Issue 3 - Supported in that the current housing market does not cater well for a wide section of society and as such requires intervention to ensure that the right homes, in the right places, are built. The approach to how this Strategic Issue is implemented practically within the District, given the existing constraints and opportunism that should be considered.</p> <p>Reword Strategic Issue 3: “Re-balancing the housing market through housing growth that is directed towards sustainably and suitable areas and settlements as identified through, and is compliant with, the Local Plan”</p>	Noted. Strategic Issue 3 is explicit in acknowledging the need for housing growth, with the vision and strategic objectives (SO2) of the Plan Review clear that this should be in sustainable locations to provide better access to housing for all sections of society. Therefore no change required.
SI1	54	Katherine	Else	Claremont Planning	Miller Homes	<p>Claremont Planning, on behalf of Southern &amp; Regional and Miller Homes, support the existing strategic issues and identified in the emerging Local Plan Review, but advance that they do not go far enough in assessing the development pressures in the District from the wider region. Whilst Strategic Issue 5 refers to co-operation with the West Midlands Conurbation to address development needs, there should be greater emphasis on the spatial characteristics in how this need will be addressed.</p> <p>Furthermore, given that Bromsgrove has historically prepared its Plan alongside Redditch, there are links between the councils that should be acknowledged and as such the cross-boundary dimension of development between the two Councils should also be included as a strategic issue which should be granted due consideration. As such, the strategic objectives do not provide a justified basis in ensuring that the Duty to Co-Operate is met given the historical linkages between Bromsgrove and Redditch are acknowledged.</p> <p>Strategic Issue 3 is supported by Southern &amp; Regional/Miller Homes in that the current housing market does not cater well for a wide section of society and as such requires intervention to ensure that the right homes, in the right places, are built. However, it is emphasised that the approach to this Issue is underpinned as to how it is implemented practically within the District, given the existing constraints and opportunism that should be considered. Strategic Issue 3 could be amended to state; “Re-balancing the housing market through housing growth that is directed towards sustainable and suitable areas as identified through, and is compliant with, the Local Plan”.</p>	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI1	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	Strategic Issues 1 to 5 are supported. The need to co-operate with the West Midlands Conurbation to address wider development needs, as expressed as Strategic Issue 5, is supported. However, the wording of this Strategic Issue could be strengthened to refer directly to co-operation with neighbouring local authorities in meeting wider growth needs through local planning activity.	Noted. The strategic issue concerning co-operating with the West Midlands conurbation will be broadened to include co-operation with other neighbouring authorities in the formulation and implementation of the Plan Review.
SI1	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	Given that one of the key reasons for the local plan review is to review the Green Belt to deliver the development required, an additional Strategic Issue 6 should be included to make this explicit.	Noted. It is considered that the Plan Review, as well as the currently adopted Bromsgrove District Plan, is explicit in acknowledging the need to review the Green Belt in seeking to meet future development needs. The Green Belt Assessment will form a key part of the evidence base to inform the Plan Review.
SI1	72	Stephen	Peters			No	Noted.
SI1	80	John	Pearce	Harris Lamb	Bloor Homes	Notwithstanding the cross boundary issues that we contend will be instrumental in the preparation of the Plan, we also consider that the Council should address how it intends to address its longer term development needs beyond the end of the Local Plan Review Period i.e. post 2030. The fact that the Council is undertaking a full Green Belt review to inform the Local Plan review indicates that it should be taking a much longer term view of the future development needs of the District, specifically where any revisions to the Green Belt boundaries should be able to endure beyond the end of the Plan Period. We therefore suggest that identifying future directions of growth and the removal of land from the Green Belt to be safeguarded for future development should be regarded as a strategic issue that is addressed as part of the Local Plan review. Please also see our responses to SI2 and SI4 in relation to this point.	Noted. The issue of longer term development needs and safeguarded land within the Green Belt will be further considered as the Plan Review becomes more detailed in relation to the development needs / targets for the plan period and how these are met.
SI1	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	<p>A further strategic issue that should be addressed is how the Council intends to address its longer term development needs beyond the end of the Plan Review period i.e. post 2030. Whilst we are not advocating that the Council considers at this time a specific quantum of development or specific locations, the fact that the Council is undertaking a Green Belt review presents a significant opportunity to plan well beyond the end of the next Plan period.</p> <p>Identifying future directions of growth and the removal of land from the Green Belt to be safeguarded for future development should be regarded as a strategic issue that is addressed as part of this Plan Review.</p>	Noted. The issue of longer term development needs and safeguarded land within the Green Belt will be further considered as the Plan Review becomes more detailed in relation to the development needs / targets for the plan period and how these are met.

Bromsgrove District Plan Review  
Issues and Options Representations and Officer Responses

Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI1	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	How should the longer term development needs beyond the end of the Local Plan Review Plan Period post 2030 be addressed? The Council are undertaking a Green Belt Review as part of this Local Plan and this presents a significant opportunity to plan well beyond the end of the next Plan Period. Suggest that identifying future directions of growth and the removal of land from the Green Belt to be safeguarded for future development should be regarded as a strategic issue.	Noted. The issue of longer term development needs and safeguarded land within the Green Belt will be further considered as the Plan Review becomes more detailed in relation to the development needs / targets for the plan period and how these are met.
SI1	98	Sally	Oldaker			Maybe add in a specific bullet point for traffic/transport planning.	Noted. Agreed that the issue of development and transport infrastructure, including opportunities for investment or improvement schemes, should be referred to as part of the strategic objectives for the District Plan Review.
SI1	99	Mark	Dauncy	Pegasus	Gallagher Estates	Should ensure the LPR covers the strategic issues as set out in the NPPF para 20.	Noted.
SI1	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	Consider that a stronger commitment to assisting in addressing the acknowledged shortfall of homes across the GBHMA should be reflected as one of the strategic matters at the beginning of the plan. Suggest amending wording of SI 5 to "Recognising and responding to the role the borough can play in addressing the wider housing needs across the sub-region including the West Midlands conurbation."	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI1	119	Darren	Oakley	RPS Group	Gleeson	Strategic Issue 5: states "Co-operating with the West Midlands Conurbation to address wider a development need". Given the close proximity and relationship between the WM conurbation and the surrounding WM shire districts, RPS considers that a much stronger commitment to assisting in addressing the acknowledged shortfall across the Greater Birmingham and Black Country HMAs should be reflected as one of the strategic matters at the beginning of the Plan. Suggest that 'Co-operating' is amended to: 'Addressing the wider housing needs across the sub-region including the West Midlands conurbation'.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI1	120	Michael	Davies	Savills	Cala Homes	Should address the strategic issue of the Green belt.	Noted. It is considered that the Plan Review, as well as the currently adopted Bromsgrove District Plan, is explicit in acknowledging the need to review the Green Belt in seeking to meet future development needs. The Green Belt Assessment will form a key part of the evidence base to inform the Plan Review.
SI1	122	Michael	Davies	Savills	Landowners	Green Belt should be considered as a key strategic issue that the Plan Review should look to address. The current adopted Plan confirms that the district does not have enough non-Green Belt land to meet the current housing requirement. Green Belt is a key strategic issue that should be addressed by the Plan Review.	Noted. It is considered that the Plan Review, as well as the currently adopted Bromsgrove District Plan, is explicit in acknowledging the need to review the Green Belt in seeking to meet future development needs. The Green Belt Assessment will form a key part of the evidence base to inform the Plan Review.
SI1	123	Michael	Burrows	Savills	Landowners	Consider that the review of the Green Belt should be identified as a key strategic issue that BDC should address through the Local Plan Review.	Noted. It is considered that the Plan Review, as well as the currently adopted Bromsgrove District Plan, is explicit in acknowledging the need to review the Green Belt in seeking to meet future development needs. The Green Belt Assessment will form a key part of the evidence base to inform the Plan Review.
SI1	161	Ian	Macpherson		Self	No	Noted.
SI1	165	Johanna	Wood			Strategic Issue 2 should be qualified to include : provision of an effective and efficient strategic infrastructure	Noted.
SI1	192			Dodford with Grafton Parish Council		strategic issues seem like the right ones.	Noted.
SI1	194	Darren	Oakley	RPS	Clients	Q. SI 1 - Strategic Issue 5: states "Co-operating with the West Midlands Conurbation to address wider a development need". Given the close-proximity and relationship between the West Midlands conurbation and the surrounding West Midlands shire districts, RPS considers that a stronger commitment to assisting in addressing the acknowledged shortfall across the Greater Birmingham and Black Country Housing Market Areas should be reflected as one of the strategic matters at the beginning of the plan. Suggest that 'Co-operating' is amended to: "Addressing the wider housing needs across the sub-region including the West Midlands conurbation."	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.

**Q.SI2 Do you think the Plan should cover Bromsgrove District only and continue to take the form of a District Plan, or are there wider geographical areas that the Plan should also take account of?**

**Bromsgrove District Plan Review**  
Issues and Options Representations and Officer Responses

Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI2	1	Tammy	Williams	Alvechurch Parish Council		Q.S1.2 asks if the plan should be for Bromsgrove district. It should be in addressing the District's economic, social and transport issues through to 2036 but it will need to be a plan also that locates Bromsgrove as a key player in the wider West Midlands economy and acknowledges the housing need and transport improvement interdependencies with the larger region	Noted. The strategic issues for the Plan Review to consider are very much within the context of Bromsgrove District and where it sits within the wider sub-region, especially where issues such as housing market areas, travel to work and commuting patterns, strategic employment sites and infrastructure provision are discussed.
SI2	1	Tammy	Williams	Alvechurch Parish Council		Paragraph 4.5 (page 17), The APNP Steering Group agrees.... The plan should continue to take the form of a District-only Plan	Noted.
SI2	2	Gill	Lungley	Barnt Green Parish Council		The plan should continue to be a District Plan	Noted.
SI2	4	Barry	Spence	Bentley Pauncefoot Parish Council		Bromsgrove District but with sensitivity to plans within neighbouring Districts such as Redditch	Noted.
SI2	9	Alexandra	Burke	Hagley Parish Council		The Council should aim to maintain about 7-8 years' land supply with frequent uncomplicated reviews every few years to release some Safeguarded Land to maintain that supply. A simultaneous review of infrastructure requirements will be needed to ensure that needs are met.	Noted. Further evidence will be gathered to inform the plan period housing requirement, against which the housing land supply of the District will be measured.
SI2	9	Alexandra	Burke	Hagley Parish Council		A Plan for the District is appropriate. However, it is clear that there is a housing land deficit in the conurbation. There should be a short West Midlands Strategic Plan setting targets for individual LPAs within the consortium of 14 LPAs that commissioned the GL Hearn Report. Objective should be to push as much housing as possible into the conurbation and to defer the actual release for development of land that is currently within the Green Belt. This should involve only a phased release of Greenfield Land. BDC should join with other LPAs on the urban fringe in refusing to meet any of Birmingham's alleged housing need until Birmingham reassesses their urban capacity through a revised SHLAA which is consistent in its methodology with its neighbours. BDC should apply pressure on neighbouring authorities to adopt consistent methodologies, so that targets for overspill housing may be robust. Exceptional circumstances is now defined as being after all other options have been ruled out. Requesting authorities (under the Duty to Co-operate) are thus required to demonstrate that there is no other option.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	10	Patricia	Dray	Highways England		Communities which include functional economic areas, housing needs and infrastructure implications of any plan generally extend beyond the boundaries of any single local authority. While the mechanism to meet cross boundary needs within Local Plans must conform with the necessary legislation and requirements under the Duty to Cooperate, Highways England does not have a view on the precise mechanisms to achieve this. Highways England is identified as a Duty to Cooperate party and will support the Council in the plan's development.	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, including consideration of strategic level issues that are cross boundary in nature.
SI2	13			Natural England		Natural England does not have a preference either way, but notes that the Council will need to consider the findings of the GL Hearn report. We also recommend that the council considered its ability to take a strategic approach to the delivery of ecological networks, green infrastructure and net gain, in line with the refreshed NPPF and the Government's 25 Year Environment Plan.	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, including consideration of strategic level issues that are cross boundary in nature.
SI2	19	Steven	Bloomfield	Worcestershire Wildlife Trust		The plan must be informed by cross boundary issues and work emerging on a larger scale, including wider ecological network mapping. Wider strategies that should underpin development decisions include the Worcestershire Green Infrastructure Strategy and the Government's 25 year Environment Plan.	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, including consideration of strategic level issues that are cross boundary in nature.
SI2	20	P	Harrison	Wythall Parish Council		We think the Plan should cover Bromsgrove District ONLY.	Noted.
SI2	22	Carl	Mellor	Black Country Authorities		The Plan should continue to take the form of a District Plan but should acknowledge where there are strategies and site allocations which have an impact on neighbouring authorities or contribute to wider socio-economic needs outside of the District itself.	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, including consideration of strategic level issues that are cross boundary in nature.
SI2	27			Stratford On Avon District Council		Formal joint plan-making procedures would need to be established for the Local Plan Review to cover areas outside of the District. There is merit in cross-boundary working. The functional relationship between Bromsgrove and Stratford is not as strong as Bromsgrove with Redditch, or Stratford with Warwick. SDC is content that the informal and ongoing working through the Duty to Co-operate is satisfactory.	Noted and agreed regarding procedural requirements where the Plan Review was to cover areas outside of the District.
SI2	28	Emily	Barker	Worcestershire County Council		In considering transport issues, a greater than district perspective is required because of the complex movement patterns and reasons for journeys. Activity and development in single district cannot be considered in isolation. The Plan doesn't automatically mean that Bromsgrove should not bring forward a district plan, but it must be informed by plans and proposals from neighbouring authorities and the wider region.	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, including consideration of strategic level issues that are cross boundary in nature. The District Plan Review will be prepared in the context of the Duty to Cooperate with neighbouring local authorities and other important stakeholders.
SI2	34	Sue	Baxter			I think the Plan should only cover Bromsgrove District.	Noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI2	35	Peter	King	Campaign to Protect Rural England		A Plan for Bromsgrove District is appropriate, our research on housing targets shows that those for Birmingham and Redditch are over-estimated, in the case of Redditch grossly so. Ideally, there should be a Joint Housing Strategy for the whole of the 14 LPAs covered by the Strategic Growth Study, but if that is not done, a Joint Housing Strategy with Redditch will be needed. These should be quite brief documents, setting out housing targets agreed within the GBBC HMA, with the intention that 100% of the HMA's overall housing target should be met, not 90% or 110% of it (or worse). The latest housing methodology tends to increase Bromsgrove's target and decrease Redditch's.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	36	Conrad	Palmer	Fairfield Village community Association		Plan should take in to account local needs across the District, to be able to "SO 3 Support the vitality and viability of...villages...".	Noted. Further evidence will be gathered to inform the plan period housing requirement across the District.
SI2	38	Sue	Green	Home Builders Federation		The Bromsgrove Local Plan Review (LPR) should be positively prepared and provide a strategy which as a minimum seeks to meet local housing needs and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). To fully meet the legal requirements of the Duty to Co-operate Bromsgrove District Council should engage on a constructive, active and on-going basis with its neighbouring authorities to maximise the effectiveness of plan making. The LPR should be prepared through joint working on cross boundary issues such as where housing needs cannot be wholly met within administrative areas of individual authorities. The meeting of unmet needs should be set out in a Statement of Common Ground (SoCG) signed by all respective authorities in accordance with the 2018 NPPF.	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, including consideration of strategic level issues that are cross boundary in nature. The District Plan Review will be prepared in the context of the Duty to Cooperate with neighbouring local authorities and other important stakeholders.
SI2	39	Andrew	Carter	Homes England		The Plan should remain as a District Plan, but needs to take a macro perspective in working with adjoining authorities to ensure strategic pressures are fully considered. This will ensure infrastructure pressures such as new schools and highway improvements are adequately planned for alongside the housing targets.	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, including consideration of strategic level issues that are cross boundary in nature. The District Plan Review will be prepared in the context of the Duty to Cooperate with neighbouring local authorities and other important stakeholders.
SI2	42			Wythall Residents Association		The Plan should cover Bromsgrove District only	Noted.
SI2	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	To be found 'sound' a plan must have been positively prepared, providing for the area's objectively assessed needs, as a minimum, informed by agreements with other authorities. This is to ensure that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.  As such, it is considered the Local Plan Review will need to show this joint-working and ensure that wider unmet need is catered for within the District, to ensure the plan can be found 'sound'. This is in particular reference to the Greater Birmingham Housing Market Area (GBHMA).	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	46	Ian	Mercer	Bruton Knowles	Church of England	The plan for Bromsgrove District should be prepared in the context of a wider geographical area, whilst specifically enabling the Council to meet local housing needs as well as the unmet needs of neighbouring authorities where possible (Greater Birmingham Housing Market). This will maximise the effectiveness of the Plan and better meet the total national housing need.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	47	Michael	Jones	Caddick Land		The Local Plan Review involves issues which are strategic by nature as part of the housing requirement is to accommodate part of the unmet housing needs of Birmingham. This requires the cooperation of Birmingham City Council to ensure that development sites come forward within Bromsgrove District that are well related to Birmingham. This does not necessitate a joint spatial strategy as the allocations are unlikely to cross administrative boundaries but the view and support of the City Council should be sought.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI2	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	The plan should cover the district area only and continue to take the form of the district plan. The new plan will contain the spatial strategy for how and where the deficit of 2300 dwellings will be accommodated in the district as well as its future needs and those of the wider West Midlands HMA. Under the Duty to cooperate, the plan MUST have regard to unmet need of the adjoining authorities, as it did before (with the allocation of housing sites to meet the unmet need of Redditch in particular). The plan should be contained to its own administrative boundaries but if adjoining authorities are undergoing plan reviews within the same timeframe, there may be the opportunity to align plan timetables and policies to jointly tackle issues and potentially share resources. Redditch Borough Council adopted its Local Plan No 4 on 30th January 2017 and Birmingham City Council adopted its Development Plan on 10th January 2017 - it does not appear that there are plans to review either of these plans and a joint approach would result in delays for Bromsgrove.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>The Plan area, which encompasses that entire area of Bromsgrove District, in the first instance is the most appropriate spatial and geographic area for the Plan to cover. Whilst the Plan area is made up of variety of spaces and places, with areas strongly influenced by the open countryside, by the urban edge of the West Midlands Conurbation and by the Green Belt, it would not justifiable or shape the Plan into separate parts to cover these different areas. Rather, it is advanced that the Plan should take robust consideration of these varying areas and should provide sections within the Plan that approach the distribution and type of development within the District. For example, the Plan could approach the spatial characteristics of the District in separate parts. Albeit this approach may provide a stronger basis in approaching growth that is more likely to be appropriate to its immediate context, it is debatable as to whether this would produce a more effective delivery of the Plan.</p> <p>Claremont Planning is of the view that whilst the Plan should provide sufficient consideration as to how the West Midlands Conurbation influences development in Bromsgrove, whether this should materially affect how the Plan is prepared and published is dependent on whether the existing form of the Plan has been ineffective. As the existing Plan has acknowledged that an early review of the Plan is required to ensure that sites for the 2,500 dwellings of unmet need can be found, it could be argued that the Plan as it stands has not been effective in that context. Therefore, it is advanced to the LPA that certain consideration should be applied in the next stages of the Plan as to how the District's varying spatial characteristics can be most effectively incorporated into the new Plan. If this spatial characteristic is incorporated into the implementation of the Plan, it should underpin the spatial strategy for the distribution of development which should take into account sustainable locations that are strongly influenced by these different areas of the District.</p>	Noted. The emerging BDP Review consultation document will provide further information on the proposed spatial strategy / settlement hierarchy for the District Plan Review.
SI2	52	Tom	Ryan	Claremont Planning	Bellway Homes	<p>The Plan area, which encompasses that entire area of Bromsgrove District, in the first instance is the most appropriate spatial and geographic area for the Plan to cover. Whilst the Plan area is made up of variety of spaces and places, with areas strongly influenced by the open countryside, by the urban edge of the West Midlands Conurbation and by the Green Belt, it would not justifiable or shape the Plan into separate parts to cover these different areas. Rather, it is advanced that the Plan should take robust consideration of these varying areas and should provide sections within the Plan that approach the distribution and type of development within the District. Claremont Planning is of the view that whilst the Plan should provide sufficient consideration as to how the West Midlands Conurbation influences development in Bromsgrove, whether this should materially affect how the Plan is prepared and published is dependent on whether the existing form of the Plan has been ineffective. The presence of Bromsgrove as the primate settlement of the District should also not be undermined through the Local Plan and that the influence it has on its immediate surroundings should be granted due consideration.</p>	Noted. The emerging BDP Review consultation document will provide further information on the proposed spatial strategy / settlement hierarchy for the District Plan Review.



**Bromsgrove District Plan Review**  
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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI2	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	<p>The Plan area, which encompasses that entire area of Bromsgrove District, in the first instance is the most appropriate spatial and geographic area for the Plan to cover. The District is made up of a variety of spaces and places. The Plan should consider these varying areas and provide sections in the Plan that approach the spatial characteristics of the District in separate parts:</p> <ul style="list-style-type: none"> <li>- Bromsgrove and surroundings</li> <li>- Greater Birmingham fringe</li> <li>- South Bromsgrove and Redditch</li> </ul> <p>Albeit this approach may provide a stronger basis in approaching growth that is more likely to be appropriate to its immediate context, it is debatable as to whether this would produce a more effective delivery of the Plan. Whilst the Plan should provide sufficient consideration as to how the West Midlands Conurbation influences development in Bromsgrove, whether this should materially affect how the Plan is prepared and published is dependent on whether the existing form of the Plan has been ineffective. The presence of Bromsgrove as the primary settlement of the District should also not be undermined through the Local Plan and that the influence it has on its immediate surroundings should be granted due consideration.</p> <p>As the existing Plan has acknowledged that an early review of the Plan is required to ensure that sites for the 2,500 dwellings of unmet need can be found, it could be argued that the Plan as it stands has not been effective in that context. Consideration should be applied in the next stages of the Plan as to how the District's varying spatial characteristics can be most effectively incorporated into the new Plan. If this spatial characteristic is incorporated into the implementation of the Plan, it should underpin the spatial strategy for the distribution of development which should take into account sustainable locations that are strongly influenced by these different areas of the District.</p>	Noted. The emerging BDP Review consultation document will provide further information on the proposed spatial strategy / settlement hierarchy for the District Plan Review.
SI2	54	Katherine	Else	Claremont Planning	Miller Homes	<p>The Plan area, which encompasses that entire area of Bromsgrove District, in the first instance is the most appropriate spatial and geographic area for the Plan to cover. It is advanced to the LPA that certain consideration should be applied in the next stages of the Plan as to how the District's varying spatial characteristics can be most effectively incorporated into the new Plan. If this spatial characteristic is incorporated into the implementation of the Plan, it should underpin the spatial strategy for the distribution of development which should take into account sustainable locations that are strongly influenced by these different areas of the District.</p>	Noted. The emerging BDP Review consultation document will provide further information on the proposed spatial strategy / settlement hierarchy for the District Plan Review.
SI2	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	In response to the question as to whether the Plan should cover a wider area than just Bromsgrove District only, it is noted that the WMCA does not have planning powers and therefore strategic policies cannot be set at the conurbation level.	Noted.
SI2	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	<p>It is recognised that cross boundary co-operation has taken place with Redditch Borough Council on the current plan, and that land within Bromsgrove was allocated to meet an element of cross-boundary needs. This is an approach which is welcomed, and we suggest similar discussions should take place – including with Birmingham City Council – at an early stage of plan making for the emerging Local Plan.</p> <p>he clear physical and functional relationship between Bromsgrove district and neighbouring authorities – most notably Birmingham - is considered to be one of the central themes which should shape decision making on the emerging Bromsgrove local plan. The strategy and policies contained within the emerging Local Plan must have as a starting point the evaluation and selection of development locations including those immediately adjacent to existing settlements not within the district, in order to deliver the most sustainable development geographically as well as best meet the needs of the local Housing Market.</p>	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, including consideration of strategic level issues that are cross boundary in nature. The District Plan Review will be prepared in the context of the Duty to Cooperate with neighbouring local authorities and other important stakeholders.
SI2	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	<p>It is important for Bromsgrove to acknowledge and take into consideration the cross boundary issues which impact on Bromsgrove and not only regarding Redditch. Bromsgrove borders onto Birmingham and there are strong economic links between Birmingham and Bromsgrove with a significant proportion of Bromsgrove District Residents commuting to work within Birmingham. Number 23 (SGS potential directions of growth to accommodate the HMA's Housing Requirements) between Birmingham and Bromsgrove/Redditch aligns with the area identified as one of the potential options for development distribution (Option 5) .</p>	Noted. A comprehensive and proportionate evidence base will inform the Plan Review, including consideration of strategic level issues that are cross boundary in nature. The District Plan Review will be prepared in the context of the Duty to Cooperate with neighbouring local authorities and other important stakeholders.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI2	63	Fiona	Lee-McQueen	Framptons	Bellway Homes	Like the adopted Bromsgrove District Plan, the Plan Review should identify measures to deliver neighbouring authorities unmet housing needs.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	65	Louise	Steele	Framptons	Summix Ltd	The Plan Review should take account of the implications of planning policies of neighbouring authorities as well as identifying measures to deliver neighbouring authorities unmet housing needs.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	68	Nicole	Penfold	Gladmans		The Plan should take account of the wider area with regard to NPPF Paragraph 35a	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	69	Latisha	Dhir	GVA	St Phillips	The GBHMA has been confirmed through the examination of the BDP (2031) as an appropriate geography within which to ensure that unmet housing needs are met. Therefore, the Council must have regard to the unmet needs arising from this HMA in setting its housing target in the Local Plan Review. It is clear that the SGS forms an independent review which the Council will need to take into account in identifying their considered options going forward. Whilst the Council has acknowledged the publication of this evidence, there is no recognition within the housing targets of the consultation document to accommodate an appropriate proportion of the identified wider HMA shortfall. Unless this is achieved, highly likely that the new Local Plan will be found unsound and the Duty to Co-operate will not be met.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	72	Stephen	Peters			I think the Plan should cover Bromsgrove District ONLY.	Noted.
SI2	75	Rachel	Mythen	GVA	Taylor Wimpey	Support for the current approach of the preparation of the emerging Bromsgrove District Plan, namely to focus on meeting the District's full objectively assessed need for housing. Notwithstanding this, the Local Plan Review must also address the need to collectively address the wider HMA shortfall in housing through the Duty to Cooperate. Failure to do so will be very likely to result in the new Local Plan being found unsound and the Duty to Cooperate will not be met.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	76	Emily	Vyse	GVA	University of Birmingham	It is considered that through the established Duty to Cooperate and an agreement between the HMA authorities to review and address the unmet need beyond administrative boundaries, that the District Plan should be capable of tackling its share of the wider issue. That said, the ability to truly and collaboratively address the issue may face greater difficulties if the adjacent authorities are working to different plan periods and calculating their 'need' in different ways. With the above in mind, we think that the Plan should cover the Bromsgrove District only but that wider geographical and temporal (i.e. plan period) issues should be addressed through engagement with adjacent authorities before significant progress is made. The agreements reached should then be reflected in other District / City Development Plans that are also under review, and a Statement of Common Ground be prepared with all HMA authorities.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	78	Sean	Rooney	Harris Lamb	Barratt Homes	Bromsgrove District Council is bound by the Duty to Co-operate to meet the unmet housing need of neighbouring authorities, in addition to it's own housing need. We support the objective of the BDP looking to address strategic cross boundary issues, such as meeting the housing requirements of neighbouring authorities.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI2	79	Shamim	Brown			I think the plan should remain focused on the Bromsgrove district itself. Inevitably housing will be used by commuters working in Birmingham. So, it will be advisable to allocate at least some sites near public transport hubs such as railway stations. Hopefully this would reduce the pressure on roads and reduce pollution.	Noted.
SI2	80	John	Pearce	Harris Lamb	Bloor Homes	Yes, we agree that the Bromsgrove Plan has to cover the administrative area of the District in order to guide land use and other planning matters over the Plan Period. However, as we have said above already, the Plan is being prepared in order to address wider housing issues in the HMA and specifically how and what proportion of Birmingham's unmet housing needs are to be accommodated in the District. As such, whilst the Plan is a District wide Plan, it will need to consider where and what sites within the District could be allocated to meet the unmet housing needs of Birmingham. Clearly, in doing so, our view is that those sites and general locations around the existing built up edge of Birmingham should be considered highly suited to achieving this objective.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Whilst the Local Plan Review cannot make allocations or control matters outside of the District, there is an expectation that land use planning considerations that will help the wider HMA should be included in the BDP.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	The Bromsgrove Plan is principally being prepared in order to guide development within Bromsgrove District in the period to 2030 and beyond. As the statutory Development Plan for the District it will only cover land use planning considerations within the administrative area of Bromsgrove. Furthermore, Bromsgrove Council will only be able to allocate land for specific uses within its own administrative area. As such, the Plan can only cover Bromsgrove District and should, therefore, continue to take the form of a District Plan.  Support the objective of the BDP looking to address issues arising in the wider West Midlands area within the administrative area of Bromsgrove.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	The Plan can only cover Bromsgrove District and should therefore continue to take the form of a District Plan. However, there is an expectation that land use planning considerations that will help the wider HMA should be included within the BDP. Support the objective of the BDP looking to address issues arising in the wider West Midlands area within the administrative area of Bromsgrove.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	87			Indenture		Take full account of Bromsgrove DC's obligation to provide its proportionate share of BCC's overspill housing requirements. Sites located on cross borders as classified in the SHLAA, provide the opportunity to locate Birmingham's unmet housing needs on sites located on the extremity of the administrative boundary.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	It is understood that Redditch Borough Council is due to commence a review of its Local Plan, but the timescales for this are currently unknown. Given the close functional and strategic relationship between the two authorities, it would be appropriate to align their plan preparation, so far as this is possible without delaying progress on the Bromsgrove District Plan review. In the light of this, it would be acceptable and appropriate for the revised Bromsgrove District Plan to continue to take the form of a District Plan.  Policy BDP3 of the adopted Bromsgrove District Plan very clearly demonstrates the role that the District has played, and continues to play, in assisting neighbouring West Midlands Authorities in respect of their strategic housing requirements. This is due to its commitment to a Local Plan review before 2023 in order to identify land to meet the FOAN for the current Local Plan period, and also to accommodate unmet needs from the wider West Midlands conurbation and future needs over the period to 2040. This approach should be maintained in the future.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI2	89	Reuben	Bellamy	Lone Star Land	Cleint	<p>The plan should continue to take the form of a District Plan.</p> <p>There are examples of joint strategic plans such as the Tewkesbury, Gloucester and Cheltenham Joint Core Strategy and the South Worcestershire Development Plan. In these cases, there are close links between the rural authorities and the Cities/large town within them For example, Malvern and Wychavon surround Worcester City and form part of a housing market with it. Therefore, in these cases, the production of a joint plan reflects the issue facing those authorities. This is not the case for Bromsgrove. Whilst Redditch lies to its south eastern border, Redditch also has a border with Stratford on Avon District. Obviously there is a close relationship between the Birmingham and Black Country conurbation but the same is true of every District that adjoining the conurbation. In addition, regard should be had to the delays in getting the politicians of each individual authority to agree a joint plan. In both of the examples cited above, the politicians at one of the three constituent authorities rejected the draft plans which led to delay and uncertainty.</p> <p>It is noted that the Issues and Options paper does not cite any particular reasons why a joint plan should be prepared and gives a very good reason (namely not being part of the West Midlands Combined Authority) why it should stay as a District only plan.</p>	Comments noted regarding difference between authorities with or preparing joint plans and circumstances for Bromsgrove/Redditch.
SI2	94			Nigel Gough Associates	Aniston Ltd	Plan should take full account of Bromsgrove's obligation to provide its proportionate share of BCC's overspill housing requirements.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	95			Nigel Gough Associates	Monksgraston Ltd	We consider the plan should take into consideration the Bromsgrove's obligation to provide it's proportionate share of Birmingham's overspill housing requirements.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	96			Nigel Gough Associates	Mr Stapleton	<p><b>*LAND FRONTING SHAW LANE, STOKE PRIOR*</b></p> <p>The plan should also take full account of Bromsgrove District Council's obligation to provide its proportionate share of Birmingham City Council's overspill housing requirements.</p> <p>Sites located on the boundary and are classified in the Bromsgrove SHLAA provide the opportunity to locate Birmingham's unmet need on sites located on the extremity of BDC's administrative boundary.</p>	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	96			Nigel Gough Associates	Mr Stapleton	<p><b>*LAND AT THE ELMS, ROCK HILL*</b></p> <p>The plan should also take full account of Bromsgrove District Council's obligation to provide its proportionate share of Birmingham City Council's overspill housing requirements.</p>	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	We consider the plan should take full account of BDC's obligation to provide its proportionate share of Birmingham's overspill requirement. Sites located on cross borders provide the opportunity to locate Birmingham's unmet needs on sites located on the extremity of BDC's administrative boundary.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI2	99	Mark	Dauncy	Pegasus	Gallagher Estates	Appropriate to continue to pursue a Plan which covers the geographical area of Bromsgrove district. Essential that BDC co-operates with neighbouring authorities with regard to strategic matters.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	100	Ryan	Bishop			I think the council has enough to plan in the current period without extending the scope further.	Noted.
SI2	103	Chris	May	Pegasus	Persimmon Homes	Whilst recognising a clear benefit in an appropriate level of strategic planning, combining authorities as necessary to address cross-boundary issues it is probably neither necessary or practical in the current circumstances. There is a long-standing and broadly successful history of cooperation between Redditch and Bromsgrove Councils. If this cooperation deepens it will help deliver successful strategic planning.	Comments noted regarding difference between authorities with or preparing joint plans and circumstances for Bromsgrove/Redditch.
SI2	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	The Plan must have regard to the wider geographical area of the West Midlands Conurbation, given the functional and Physical relationship with that area, and the future demand for housing arising from the Conurbation.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	<p>Consider that the plan should consider Bromsgrove District, with a complete Local Plan (rather than a two-tier Core Strategy/Site Allocations approach), however it is abundantly clear that the District must take account of the unmet housing need of the Greater Birmingham Housing Market Area.</p> <p>Cooperation with neighbouring authorities such as Wyre Forest District in terms of the impacts upon infrastructure will also be critical, so meaningful Statements of Common Ground will be essential, early on in the process.</p> <p>Draw BDC's attention to the South Staffordshire Issues and Options document which refers to taking the suggested 4,000 dwellings identified in this location in the SGS for the unmet need from the GBHMA: 'If other authorities in the HMA were to take this approach of seeking to accommodate the minimum capacity implied by all the HMA areas of search, then the housing shortfall identified in the HMA Strategic Growth Study up to 2036 would be met.'</p> <p>It therefore begs the question why BDC have not seized this opportunity in the same way as South Staffordshire have in their Issues and Options document? The sooner BDC acknowledge the implications of the GBHMA shortfall in their own plan, the better.</p>	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	A case is made for an increase in the overall objectively assessed need target that the council are considering. Affordability is a major problem in Bromsgrove District and is something that has got steadily worse over time. Unless this trend is stabilised, a significant number of people will be 'locked out' of the housing market, putting pressure on the private rented sector and social rented sector, which struggles to keep pace with demand as it is. It is our view that this scandalous situation must be addressed first and foremost through the plan process, providing adequate housing that reflects real housing need. This should include a reasonable proportion of unmet need from the Greater Birmingham Housing Market Area and Black Country, and not just what are largely predictions of household growth from what have been suppressed trends of household formation within the District	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of SI2, we consider that the plan should consider Bromsgrove District, with a complete Local Plan (rather than a two-tier Core Strategy/Site Allocations approach), however it is abundantly clear that the District must take account of the unmet housing need of the Greater Birmingham Housing Market Area, as well as that of the neighbouring Black Country Cooperation with Wyre Forest District in terms of the impacts upon infrastructure will also be critical, so meaningful Statements of Common Ground will be essential, early on in the process.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI2	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	We would draw BDC's attention to the South Staffordshire Issues and Options document <sup>1</sup> , at paragraph 4.16, which states (when referring to the suggested 4,000 dwellings SSC would take of unmet need from the GBHMA): 'If other authorities in the HMA were to take this approach of seeking to accommodate the minimum capacity implied by all the HMA areas of search, then the housing shortfall identified in the HMA Strategic Growth Study up to 2036 would be met.' It therefore begs the question why BDC have not seized this opportunity in the same way as South Staffordshire have in their Issues and Options document? It is our view that the sooner BDC acknowledge the implications of the GBHMA shortfall in their own plan, the better.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	112	Gareth	Sibley	RCA Regeneration	Piper Group	Plan should consider Bromsgrove District with a complete Local Plan, however, clear that the District must take account of the unmet housing need of the GBHMA as well as that of the neighbouring Black Country. Co-operating with neighbouring authorities such as Wyre Forest in terms of impacts on infrastructure also critical. Meaningful SOCGs essential early on in the process. Why have BDC not seized the opportunity to address the GBHMA unmet need in the Issues and Options consultation. The sooner BDC acknowledge the implications of the GBHMA shortfall in their own plan, the better.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	113	Gareth	Sibley	RCA Regeneration	CAD Square	In respect of SI2, we consider that the plan should consider Bromsgrove District, with a complete Local Plan (rather than a two-tier Core Strategy/Site Allocations approach), however it is abundantly clear that the District must take account of the unmet housing need of the Greater Birmingham Housing Market Area, as well as that of the neighbouring Black Country. Cooperation with Wyre Forest District in terms of the impacts upon infrastructure will also be critical, so meaningful Statements of Common Ground will be essential, early on in the process. Re: South Staffs Local Plan consultation, it begs the question why BDC have not seized this opportunity in the same way as South Staffordshire have in their Issues and Options document? It is our view that the sooner BDC acknowledge the implications of the GBHMA shortfall in their own plan, the better.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	115	John	Breese	Rosconn Strategic Land		The Plan should continue to take the form of a District Plan. This however, must be seen in the context of NPPF paragraph 35c which states Plans should be based on effective joint working on cross-boundary strategic matters rather than these being deferred. For Bromsgrove District these strategic matters include the overall housing need arising in the Birmingham and Black Country Housing Market Area.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	119	Darren	Oakley	RPS Group	Gleeson	The new National Planning Policy Framework (NPPF) maintains an emphasis on identifying cross boundary issues, and ensuring that suitable arrangements are considered, including the provision for unmet need (paragraph 35 refers). Whether the Council continues on its own, or as part of a joint Plan, the provisions of the new NPPF need to be satisfied in order to find the Plan sound. It is expected that the Council continue means of joint working with relevant neighbours to ensure that this takes place as part of the LPR.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	120	Michael	Davies	Savills	Cala Homes	The plan should consider a wider geographical area to account for the wider HMA's unmet housing need, BDC has a legal duty to engage and cooperate with neighbouring authorities. Consider that Bromsgrove's contribution towards the HMA shortfall should be included in this Local Plan. This should be set out in a SOCG. Local Plan should be based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred as evidenced by a SoCG.	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.
SI2	122	Michael	Davies	Savills	Landowners	We consider that the plan should consider a wider geographical area to account for the wider HMA's unmet housing need. Aside from allowing for economic development, an increase in housing requirement is likely to come from requirements placed on Bromsgrove through a shortfall in the HMA. Although it is yet to be confirmed, the Council has a legal duty to cooperate with neighbouring authorities. We consider that Bromsgrove's contribution towards this shortfall should be addressed in this plan period (which could be until 2036).	It is acknowledged that co-operation with the wider region will be vital to ensure that the wider development needs can be met. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019). This will be reflected in the Local Plan Review process.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI3	1	Tammy	Williams	Alvechurch Parish Council		The Revised NPPF makes it clear that Councils should set out housing requirements for Designated Neighbourhood Areas as part of their strategic policies. NPs could then work proactively, with such a strategic housing allocation and through Community involvement to indicate preferred sites to meet those local housing needs.	Noted. Further evidence will be gathered to inform the plan period housing requirement across the District.
SI3	2	Gill	Lungley	Barnt Green Parish Council		There should be a high level of input from Parish Councils	Noted. The District Council will continue to work closely with Parish Councils, both within designated neighbourhood areas and elsewhere in the District, as the District Plan Review progresses.
SI3	4	Barry	Spence	Bentley Pouncefoot Parish Council		Neighbourhood plans should be given significant weight in reviewing the District Plan	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	8	Nancy	Bailey	Frankley Parish Council		A review of housing needs and numbers should take place prior to removing land from the Green Belt.	Noted. Further evidence will be gathered to inform the plan period housing requirement across the District.
SI3	9	Alexandra	Burke	Hagley Parish Council		Suggest that the Plan should identify as few policies as possible as strategic, but should apportion housing targets between: - Bromsgrove - The Seven large Villages (adding Cofton Hackett to the present list in BDP2) - All the smaller villages - together There should wherever possible be equal regard from the District Plan that if the NP is safe and evidence based that imposed housing numbers from the district would be subservient to the local NP.	Noted. Further evidence will be gathered to inform the plan period housing requirement across the District. Consultation responses to the issues and options, in particular on Q.SI10, will also inform the settlement hierarchy approach for the Plan Review. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	20	P	Harrison	Wythall Parish Council		Neighbourhood plans can only complement the District Plan and therefore result in more development. They have value in that they reflect local knowledge and aspirations.	Noted. Neighbourhood plans must be in general conformity with the District Plan to meet the basic conditions for neighbourhood plans. Agreed that there is significant value in reflecting local knowledge and aspirations in neighbourhood plans.
SI3	27			Stratford On Avon District Council		NDPs could identify suitable sites for development with local buy in, reducing local objection. Figure 1 is slightly misleading as the NDPs are at a very early stage in the process (i.e. Area Designation) and could take a further two years to be 'made' and have any weight.	Noted. Figure 1 shows the designated areas in the District which significantly vary in their status. Whilst some areas are more recently designated and therefore have longer to reach the status of a 'made' neighbourhood plan, that will not preclude complementary work or evidence gathering taking place that could inform both a neighbourhood plan and the District Plan Review.
SI3	28	Emily	Barker	Worcestershire County Council		Neighbourhood Plans could establish assets of value to the local community to be protected, enhanced or restored, identify land or locations for development and promote health and wellbeing within their communities. Should establish design philosophies to ensure new development is in keeping with existing settlements and promotes opportunities for Green Infrastructure, recreation and health.	Noted. Neighbourhood plans must be in general conformity with the District Plan to meet the basic conditions for neighbourhood plans. Agreed that there is significant value in reflecting local knowledge and aspirations in neighbourhood plans on a wide range of issues affecting the use of land.
SI3	31	Rachel	Jones	Better Environment Theme Group		Role of neighbourhood plans – if plans are adopted then they need to part of local plan. Neighbourhood plans could contain more detailed elements e.g. affordable housing. As much weight as a development plan	Noted. Once 'made' a neighbourhood plan becomes part of the statutory development plan for the designated area and therefore holds equivalent weight to the District Plan, which it must be in general conformity with.
SI3	33	Steve	Colella	District Councillor		The power of a Neighbourhood Plan that has been given adoption power through a referendum remains to be tested where a development is contrary to it. There may be a significant number of cases (emerging) that would suggest that once adopted through referendum the NP must be adhered to and supported fully by the district council, unless a review of the plan says something different and therefore causing a further referendum. Absolute support should be given through the planning process not to undermine the NP because of failings by the district not to have an adequate land supply.  The NPPF requires NPs to be aligned to the District Plan. However, there should be equal regard from the district plan that if the NP is safe and evidence based that imposed housing numbers from the district would be subservient to the local NP.	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI3	34	Sue	Baxter			Neighbourhood plans form a valuable part of the local plan making process whilst recognising the housing needs of the wider local plan. they allow the local community to input into the 'where' and the design of any new developments as well as identifying local infrastructure needs.	Noted. Neighbourhood plans must be in general conformity with the District Plan to meet the basic conditions for neighbourhood plans. Agreed that there is significant value in reflecting local knowledge and aspirations in neighbourhood plans on a wide range of issues affecting the use of land.
SI3	35	Peter	King	Campaign to Protect Rural England		Recent research has indicated that Neighbourhood Plans were often liable to be overridden (and thus become ineffective in controlling development). Neighbourhood Plans are effective, except in a series of cases, where they are overridden by wider policy: <ul style="list-style-type: none"> <li>•If the District does not have a 3-year housing land supply.</li> <li>•If the Neighbourhood Plan Area does not have a 5-year housing land supply.</li> <li>•If the Neighbourhood Plan does not provide development proposals. For example, if it is only about design, it will not prevent development.</li> <li>•If it is only an emerging plan and is deemed not close to adoption.</li> <li>•If it was prepared to conform to an old District Plan but that has replaced by a new District Plan.</li> </ul> This list makes it quite difficult for a Neighbourhood Plan to be effective. The last item is particularly relevant here: it is important that the new Plan does not change policies in any way that tends to override NPs, unless this is clearly necessary. The research cited is now published: Lillian Burns and Andy Yuille, Where next for Neighbourhood Plans? Can they withstand external pressures? (National Association of Local Councils, October 2018).	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	35	Peter	King	Campaign to Protect Rural England		Since Neighbourhood Plans (NPs) are adopted by referendum, they have greater democratic legitimacy than a district plan (adopted by elected councillors). It would be a denial of democratic legitimacy for a new BDP to ride roughshod over NPs. They are only required to conform to the Strategic Policies of the District Plan, but are entitled to depart from others. This requires policies to be classified as strategic or otherwise; and careful provision so that the legitimate aspirations of NP Areas are not overridden without good cause. In theory, every NP ought to be revised in the light of the adoption of a new BDP, great care needs to be taken that a new BDP does not render NPs obsolete; at least does not do so unnecessarily.	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	36	Conrad	Palmer	Fairfield Village community Association		NHP should be developed in tandem with the District Plan, identifying requirement and best addressing solutions that meet the need of the Neighbourhood and District.	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	42			Wythall Residents Association		Neighbourhood plans can only complement the District Plan and therefore result in more development.	Noted. Neighbourhood plans must be in general conformity with the District Plan to meet the basic conditions for neighbourhood plans.
SI3	42			Wythall Residents Association		Neighbourhood Plans have value in that they reflect local knowledge and aspirations.	Noted. Agreed that there is significant value in reflecting local knowledge and aspirations in neighbourhood plans.
SI3	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Preparation of Neighbourhood Plans is supported. However, recommended that strategic policies within the District Plan set out sufficient housing allocations to accommodate housing need,.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.

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SI3	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	<p>Whilst seen by some to be the opportunity to resist change, used correctly, it is our view, with the right direction from the council, that neighbourhood plans can play an important part in delivering new development within the district. Community engagement will enable the right type of development to be located where most needed and can tackle issues such as key workers homes, affordable dwellings in the rural areas. The revised NPPF reinforces their value. However, the process brings another tier to the plan making process which delays the delivery of new development.</p> <p>In Bromsgrove there are currently 6 Neighbour Areas designated (Alvechurch, Barnt Green, Catshill and North Marlbrook, Hagley, Lickey and Blackwell and Cofton Hackett and Belbroughton and Fairfield). Most of, if not all the neighbourhood plan areas are within the Green Belt and whilst the neighbourhood areas have been designated, little progress has been made with the Neighbourhood Plans, which clearly reinforces the concern raised above.</p> <p>The revised NPPF states at paragraph 136 “once established, Green Belt boundaries should only be altered where exceptional circumstances are fully justified, through the preparation or updating of plans. Strategic policies should establish the need for changes to the Green Belt boundaries.....Where a need for changes to the Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans”</p> <p>Currently therefore most of the Neighbourhood plans in Bromsgrove CANNOT make a meaningful contribution to the delivery of new development in the district.</p> <p>The Green Belt is being reviewed strategically for the purpose of the Plan review and so some Neighbourhood Areas could be given the ability to allocate land for new development removed from the Green Belt as a result. However, to avoid the need for this additional tier of planning to enable the production of the Neighbourhood Plan (which will no doubt be contentious and lengthy in process), it is our view that allocations to appropriate locations should be made within the Local Plan as part of the review, rather than leaving it for the neighbourhood plan area. This would give certainty to developers on adoption of the local plan and therefore speed up the delivery of housing.</p>	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>It is Spitfire Homes' view that the Local Plan should provide appropriate consideration of Neighbourhood Plans as mechanisms for development and growth at a lesser strategic level. This recognised in the National Planning Policy Guidance which refers to Neighbourhood Planning as a “[...]powerful set of tools for local people to ensure that they get the right types of development for their community...” Therefore, to ensure that the Local Plan remains in compliance with this guidance, Neighbourhood Plans, where they are emerging or adopted, should form a major part of the spatial strategy underpinning how development is to be distributed throughout the District.</p> <p>As such, the emerging Local Plan for Bromsgrove should attribute significant weight to Neighbourhood Plans and recognise their important role in facilitating development that is able to both meet the local, as well as strategic needs of the Local Authority. The ability of such plans to identify sites within local communities must be advocated and facilitated, particularly with supporting text that explains the purpose of a Neighbourhood Plan designation cannot be to limit development within the defined area. Equally the policy must approach the position of Neighbourhood Plans with respect to defining settlement boundaries, particularly in light of the methodologies consulted upon and the proposed Green Belt Review.</p> <p>Spitfire's site at Cofton Lake Road, Cofton Hackett has been promoted to the Parish Council through the emerging Neighbourhood Plan Consultation in July 2018 and as such has been made available to the Parish as a deliverable option in realising sustainable development in the Parish. The site demonstrates a realistic approach in ensuring that growth can be appropriately realised in locations that are able to take advantage of recent waves of growth, such as at Longbridge within close proximity to Spitfire's site at Cofton Hackett.</p> <p>The recognition of the importance of Neighbourhood Plans should be a key component of the spatial strategy of the emerging Local Plan, given their ability to ensure and direct development locally rather than at a strategic level. Without this due recognition, the Plan will fail in executing development management as effectively as possible. The Plan will also fail in complying with national guided requirements and as such would not be based on a sound strategy to ensure that the development requirements as identified through the Plan can be realised.</p>	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	<p>The Local Plan must state the role and opportunities that Neighbourhood Planning presents.</p> <p>It should be clear that Neighbourhood Development Plans can assist in shaping development in line with Local Plan policy, rather than using the Neighbourhood Planning processes to restrict development.</p>	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI3	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	Important to establish that the Neighbourhood Plans align with the Local Plan and National Planning Policy and with consideration given to the well-publicised housing need within the GBHMA. Important that it is clearly stated by the District that they will be assisting with the HMA housing need and that there will be the requirement for the release of Green Belt land to accommodate future housing. Important that the Council leads in a proactive and positive way to deliver the message to all interested parties that there is the requirement for increased development.	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	72	Stephen	Peters			Neighbourhood plans can only complement the District Plan and therefore result in more development. They have value in that they reflect local knowledge and aspirations.	Noted. Neighbourhood plans must be in general conformity with the District Plan to meet the basic conditions for neighbourhood plans. Agreed that there is significant value in reflecting local knowledge and aspirations in neighbourhood plans.
SI3	73	Stephen	Farley			A large proportion of the community aren't aware of developments until the site hoardings are up. More could be done to promote awareness [of development] and make clear the process of objecting/protesting against the viral erosion of the endangered Green Belt.	Noted. The District Council as local planning authority follow government legislation on the requirements for consultation on planning applications. The District Plan Review also must meet statutory requirements for public consultation.
SI3	73	Stephen	Farley			The reduction of local authority budgets has contributed to the rise in rural environmental destruction.	Noted.
SI3	73	Stephen	Farley			Neighbourhood planning and communities potentially have a much greater role to play in any development.	Noted. Agreed that there is significant value in reflecting local knowledge and aspirations in neighbourhood plans.
SI3	76	Emily	Vyse	GVA	University of Birmingham	We note that a Neighbourhood Development Plan is being prepared for the Alvechurch Designated Neighbourhood Area ("DNA"). The University's land lies partly within this DNA. It will be important, given its relationship with the conurbation, that this area is allocated an appropriate housing requirement in accordance with the provisions of the NPPF.	Noted. The Alvechurch Parish Neighbourhood Plan (APNP) had already been submitted for examination at the time of the consultation on the BDP Review Issues and Options. There are no development allocations within the APNP, however it is acknowledged that the plan will need to be reviewed as the District Plan Review is progressed to a more advanced stage.
SI3	78	Sean	Rooney	Harris Lamb	Barratt Homes	The Local Plan should set the housing requirement and provide direction to those areas producing a NP as the quantum of housing required in their area.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	80	John	Pearce	Harris Lamb	Bloor Homes	in acknowledging the role that Neighbourhood Plans can play in delivering the growth for the District, we note the content of Para 13 of the NPPF which confirms that Neighbourhood Plans should support the delivery of strategic policies contained in Local Plans, whilst paragraph 11 of the Framework confirms that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. The Local Plan should set the housing requirement and provide direction to those areas producing a Neighbourhood Plan as to the quantum of housing required in their area.  We, therefore, contend that the BDP should establish the strategic priorities for the District, including the quantum of housing to be provided and specific sites and locations to deliver this, including cross boundary considerations, and that once this has been established, Neighbourhood Plans can be prepared to help with the implementation of these strategic priorities.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Neighbourhood plans should not be an impediment to achieving local plan objectives and form a barrier to growth or the delivery of new housing. The Local Plan should set the housing requirement and provide direction to those areas producing a neighbourhood plan as to the quantum of housing required in their area. The neighbourhood plan should be proactive in addressing this requirement.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.

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SI3	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	<p>Neighbourhood Plans, when made for an area, form part of the statutory Development Plan. Similarly communities and local residents are instrumental in preparing Neighbourhood Plans and, therefore, they can, and will, play an important role in delivery the growth and development that is needed to meet the needs of the District over the current Plan Period but also the Local Plan Review Plan Period.</p> <p>In acknowledging the role that the Neighbourhood Plans can play in delivering the growth for the District, NPPF para 13 confirms that Neighbourhood Plans should support the delivery of strategic policies contained in Local Plans, whilst paragraph 11 of the Framework confirms that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses. Neighbourhood Plans should not, therefore, be allowed to frustrate the delivery of new housing. The Local Plan should set the housing requirement and provide direction to those areas producing a Neighbourhood Plan as to the quantum of housing required in their area.</p> <p>There is a need to avoid a situation where the Local Plan confirms the need for Green Belt boundaries to be amended but where the Neighbourhood Plan does not make corresponding allocations on the land that has been removed from the Green Belt.</p>	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Neighbourhood Plans should not be allowed to frustrate the delivery of new housing. The Local Plan should set the housing requirement and provide direction to those areas producing a Neighbourhood Plan as to the quantum of housing required in their area. Neighbourhood Plans will be increasingly important in identifying and allocating appropriate sites for development. Wish to avoid a situation where the Local Plan confirmed the need for Green belt boundaries to be amended but where the Neighbourhood Plan did not make corresponding allocations on the land that has been removed from the Green Belt.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	87			Indenture		Client has engaged with the Catshill and North Marlbrook Parish Council in connection with proposed Green Belt release.	Noted.
SI3	89	Reuben	Bellamy	Lone Star Land	Cleint	<p>There will need to be strategic housing and employment allocations, or broad areas of growth set out, that can only be made by the Local Plan. There could be a role for Neighbourhood Plans in allocating non-strategic sites and making the necessary detailed amendments to Green Belt boundaries where the Local Plan has established the need for changes to the Green Belt boundary. However, there is the potential for delay. There are currently no 'made' neighbourhood plans within the District, some 6 years after the power to create then was introduced. Therefore, if Neighbourhood plans are to play a role in delivering the Local Plan strategy, such as allocating sites, a strict time limit should be set.</p> <p>It should also be noted that six designated Neighbourhood plan areas do not cover the whole of the District.</p>	Noted. Figure 1 shows the designated areas in the District which significantly vary in their status. Whilst some areas are more recently designated and therefore have longer to reach the status of a 'made' neighbourhood plan, that will not preclude complementary work or evidence gathering taking place that could inform both a neighbourhood plan and the District Plan Review.
SI3	94			Nigel Gough Associates	Aniston Ltd	Neighbourhood Planning can only be local to the body producing that Plan, we will consult with the Parish Council accordingly.	Noted.
SI3	95			Nigel Gough Associates	Monksgraston Ltd	Strategic allocations should remain in the remit of the Local Plan.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	96			Nigel Gough Associates	Mr Stapleton	Support neighbourhood planning can only be local to the body producing that plan albeit that we will obviously consult with that parish council accordingly.	Noted.
SI3	96			Nigel Gough Associates	Mr Stapleton	Strategic allocations should remain within the remit of the Local Plan.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	By its very nature neighbourhood planning can only be local to the body producing that plan. Strategic allocations should remain within the remit of the local plan. Our client has engaged with Catshill and North Marlbrook Parish Council in connection with proposed Green Belt release.	Noted.
SI3	98	Sally	Oldaker			Make sure they have a proper say and carry some weight, for instance in a situation where BDC wants to enforce unsuitable development.	Noted. Once 'made' a neighbourhood plan becomes part of the statutory development plan for the designated area and therefore holds equivalent weight to the District Plan, which it must be in general conformity with.

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SI3	99	Mark	Dauncy	Pegasus	Gallagher Estates	Supportive of the requirement for housing need figures to be provided for designated neighbourhood areas. Neighbourhood Plans should not seek to stifle development which supports identified needs within the area. Should recognise the potential for their area to support wider cross boundary objectives where appropriate which may include making detailed amendments to Green Belt Boundaries.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	100	Ryan	Bishop			I think there should be consultations as planned to include input from neighbourhood planning – due to the not in my backyard attitude I suggest we allocate housing to an area and allow the neighbourhood to work on where that should be situated/what additional services are required.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Neighbourhood Planning and local communities have a useful and important function in respect of local issues, however, these must continue to fall within the existing development plan framework to ensure that wider needs are met.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	114	Charles	Robinson	Rickett Architects	Cawdor	Preparation of Neighbourhood Plans at this stage, in avoidance to a Strategic Review to the GB is premature. These neighbourhood plans are being used to 'put down a marker' to prevent a proper review of the GB and to prevent development.	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	115	John	Breese	Rosconn Strategic Land		<p>The role of Neighbourhood Planning and Neighbourhood Development Plans (NDPs) could play in delivering new development within the District should be appropriately balanced against the strategic nature of the Plan. As recognised the District is heavily constrained by Green Belt with 90% of the total area falling within this designation. The alteration of Green Belt boundaries is a strategic matter as per NPPF paragraph 136, so it follows that development at this level should be directed via the District Plan.</p> <p>In heavily constrained Districts such as Bromsgrove it is also necessary to ensure an appropriate level of growth is directed to sustainable locations as opposed to on a non-strategic level which could lead to new development being identified in a piecemeal fashion and thus resulting in an imbalanced and inherently unsustainable distribution of development. Green Belt Reviews at this strategic level through the District Plan as opposed to individual neighbourhood level should ensure a more consistent, robust and transparent methodology to direct new development.</p> <p>By addressing development at a spatial level the housing need arising in the Birmingham and Black Country Housing Market Area can also be better directed to the locations which are where the demographic and economic pressures related to the conurbation's unmet need are the greatest and where the interconnectivity by sustainable transport modes is the strongest.</p>	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	Support the identification of housing requirements for Neighbourhood Plan Areas and these should be stated as a minima, in order that appropriate opportunities for sustainable development can be promoted through the neighbourhood planning process.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	119	Darren	Oakley	RPS Group	Gleeson	RPS broadly supports the role that Neighbourhood Plans can play in delivering new development within the district to meet local housing needs. RPS support the identification of housing requirements for NPAs and these should be stated as minima, in order that appropriate opportunities for sustainable development can be promoted through the neighbourhood planning process.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	120	Michael	Davies	Savills	Cala Homes	Under NPPF Para 136, changes to the Green Belt boundaries should be established in strategic policies and Neighbourhood Plans have the power to make detailed amendments to those boundaries.	Noted.
SI3	122	Michael	Davies	Savills	Landowners	It is recognised in NPPF paragraph 136 that where strategic policies have established the need for changes to Green Belt boundaries, non-strategic policies, including neighbourhood Plans, can make detailed amendments to those boundaries. The Local Plan Review has an important role in identifying where development should be located and providing a clear steer to Neighbourhood Planning Groups.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.

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SI3	123	Michael	Burrows	Savills	Landowners	<p>Local communities can play an important role in identifying where new development could be delivered. In order to meet the District and HMA's housing need, Green Belt release is required.</p> <p>Where Strategic Policies have established the need for changes to Green Belt boundaries, non-Strategic Policies, including Neighbourhood Plans, can make detailed amendments to those boundaries. Neighbourhood Plans and local communities therefore need to recognise the importance of releasing land from the Green Belt in order to deliver the housing requirements for the District in sustainable locations.</p>	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	134	David	Barnes	Star Planning	Richborough Estates	<p>If Neighbourhood Plans are to be a potential vehicle to deliver growth within Bromsgrove District then there should be both clear guidance about the minimum scale of any development which will need to be accommodated within the Neighbourhood Plan area and a 'fall-back' policy to ensure development is delivered if, for example, a Neighbourhood Plan is not expediently prepared.</p> <p>Importantly, the limited role of Neighbourhood Planning in Green Belt areas must be acknowledged as part of preparing the Local Plan. Richborough Estates consider that abdicating responsibility for all detailed Green Belt amendments to Neighbourhood Plans would only serve to artificially delay the delivery of much needed housing. Instead, the interests of the District Council and those needing a home would be better served by ensuring that the Parish Councils and local communities engage with the detail of the Green Belt boundary amendments during the production of this Local Plan.</p>	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	136	Kathryn	Young	Turley	Land Fund	<p>Our client considers that Neighbourhood Planning and communities have a role to play in delivering new development within the District.</p> <p>National planning policy contained in the National Planning Policy Framework (2018) ('NPPF') establishes that: "Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies" (para. 13) and "Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies." (para. 29)</p> <p>The Parish of Hagley was designated as a neighbourhood plan area in June 2016 and the neighbourhood plan is in the initial stages of being prepared. The neighbourhood plan should reflect the development requirements which will be established through the LPR and also align with the plan period.</p> <p>In order that the neighbourhood plan responds to the needs of the Parish and that the policies can be delivered the neighbourhood plan should be prepared in consultation with:</p> <ul style="list-style-type: none"> <li>• Residents;</li> <li>• Local business and services;</li> <li>• Community groups; and</li> <li>• Landowners and developers.</li> </ul> <p>Our client welcomes the opportunity to engage with Neighbourhood Plan groups and local residents in helping deliver new homes which can meet the needs of the local community, the wider District and neighbouring authorities.</p>	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.

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SI3	137	Matthew	Fox	Turley	Redrow Homes	<p>Neighbourhood Development Plans (NDPs) can play an important role in delivering new development within the District. This is particularly the case when considering that 4 of the 6 designated Large Settlements from the BDP lie within designated NDP areas where a significant portion of growth will need to be accommodated. NDPs must reflect the development requirements that will be established through the emerging LPR and also align with the plan period. Any NDPs which are prepared in accordance with the adopted local plan will be rendered out-of-date as soon as the LPR is adopted (assuming that the LPR has an extended plan period). Where NDP's are being prepared, BDC should identify the housing need for the designated area as required by the NPPF (2018, para. 65) and reflecting the overall spatial strategy and scale of development requirements.</p> <p>By way of example, the emerging Catshill and North Marlbrook NDP 'Vision, Objectives and Policy Options' consultation Questionnaire identified a housing objective to identify sites for up to 400 new dwellings up to 2030. It is unclear how this figure has been calculated; it may be that the residual requirement identified in the BDP for 2,300 homes in the period up to 2030 (as identified in policy BDP4.3) has been divided broadly equally between the six designated Large Settlements. If this is the case, it is a crude approach which does not pay any regard to the size and accessibility of each of the individual Large Settlements nor the specific facilities and services that each provides. It is critical that BDC assist NDP Steering Groups to ensure that NDPs deliver an appropriate scale of growth in accordance with the LPR.</p> <p>It is understood that the Catshill and North Marlbrook NDP Steering Group is proposing to issue the draft NDP to BDC in summer 2019 although it is currently unclear whether this will be prepared to accord with the adopted BDP or the LPR, although it has referred to a plan period of 2030 which indicates the former. It is suggested that BDP should request that emerging NDPs be prepared to support and align with the LPR and we would welcome BDC providing guidance on how it proposes to consider adopted/emerging NDPs through the LPR process.</p> <p>In addition to local communities, it is critical that NDP consultations seek input from landowners, land promoters and housebuilders to ensure emerging policies and allocations are viable and deliverable.</p>	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	138	Charles	Robinson	Twelvetwentyone	Landowners	Neighbourhood Plans that are being prepared now are premature pending such a strategic review across Bromsgrove. Those under way now are essentially negative and are looking to stop development and influence any future development/green belt assessment.	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	138	Charles	Robinson	Twelvetwentyone	Landowners	Preparation of neighbourhood plans at this stage, in advance of a strategic review to the Green Belt, is premature. These neighbourhood plans are being used to 'put down a marker' to prevent a proper review of the green belt and to prevent development.	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.
SI3	151	Dawn	Macqueen			Neighbourhood plans should cover all residents in the district and not just the clusters who have a neighbourhood - some of which have plans. Beoley, for example, appears to have no voice.	Noted. Neighbourhood Plans are an optional planning tool for local communities should either a Parish Council or a separate 'neighbourhood forum' wish to apply as a qualifying body for designated area status.
SI3	161	Ian	Macpherson		Self	Vital role. District should indicate amount of new development but allocations should be for the NHPs.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
SI3	176	Mr & Mrs J D	Winslow			Whilst the role of Neighbourhood Plans seems to be largely informative and hence, given realistic assessments of local areas and needs, the delivery of new services/development may be facilitated, we would hope that care is taken to ensure that such Plans do not have a narrow focus which overlooks the broader context. It is noticeable (I and O, fig 1.), that, it is areas which have large suburban elements which have produced such Plans, in contrast to the lack of coverage in the more sparsely populated rural areas with limited resources, both economic and human. Since fulfilling the aims of one Neighbourhood Plan could, potentially, disadvantage other areas we welcome the fact that they are always addressed as part of an over-arching strategic policy (NPPF para. 28-30 and footnote 16).	Noted. Work informing the District Plan Review and Neighbourhood Plans should be aware of proposals in each, to ensure neighbourhood plans are in general conformity with the District Plan but also to ensure the District Plan Review does not neglect local community aspirations in designated areas.



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SI3	180	Nicholas	Rands			I think it is important to listen to the views of those in the different communities as they are the ones who have the knowledge of the specific needs and desires of the residents with regard to new development. Please make it easy for individuals and groups to register their views, without the need to make reference to planning policies and other official documents.	Noted. Agreed that there is significant value in reflecting local knowledge and aspirations in neighbourhood plans.
SI3	194	Darren	Oakley	RPS	Clients	RPS broadly support the role that Neighbourhood Development Plans (NDP) can play in delivering new development within the District to meet local housing needs. RPS support the identification of housing requirements for Neighbourhood Plan Areas (NPA) and these should be stated as minima, in order that appropriate opportunities for sustainable development can be promoted through the neighbourhood planning process. It should be acknowledged though that NDPs must reflect the strategic policies and proposals from the Local Plan Review and where development proposals for strategic sites are required, which address 'larger than local' issues, this should most appropriately be taken through the Local Plan Review process and NDP should not be used as a basis for frustrating such growth.	Noted. Strategic policies in the District Plan Review will cover issues such as housing requirement and strategic allocations. Where any neighbourhood plans propose development allocations, the District Council will work with qualifying bodies to ensure general conformity with the District Plan.
<b>Q.SI4: What timescale do you think the plan should cover and why?</b>							
SI4	1	Tammy	Williams	Alvechurch Parish Council		Considering land availability, and current 5 year supply issues, plus NPPF recommendations, it would make sense to align the Green Belt and Plan review to at least a five year contingency frame past 2036, i.e. a Plan for 2018-2041.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	2	Gill	Lungley	Barnt Green Parish Council		Preference for Option 2 - 2018 to 2041	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	4	Barry	Spence	Bentley Pauncefoot Parish Council		1, 2018 – 2036 the shorter timescale better reflects the rate of change in modern society	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	5	Kevin	Joynes	Beoley Parish Council		Plan period should be until 2036. Should be reviewed more regularly than every 25-30 years.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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SI4	9	Alexandra	Burke	Hagley Parish Council		<p>Traditional minimum was 15 years but really that ought to be 15 years from adoption. The traditional solution has been a Plan Period of about 20 years. It is probably also appropriate that a significant reservoir of land should be converted from Green Belt to Safeguarded Land, sufficient to meet development needs into the 2040s, so that it can be a very long time before any further Green Belt Review is needed. However, it isn't appropriate for any development allocations to be made in respect of Safeguarded Land immediately, it should be there as a buffer in case (or for when) it is needed.</p> <p>There needs to be a procedure whereby selected sites can be released from Safeguarded Land at fairly frequent intervals to ensure that BDC retains a 5 year housing supply and employment land, with those sites not released retaining Safeguarded Land status.</p> <p>The failure to adopt plans in a timely fashion is a current deficiency of the planning system, aggravated by the building industry wishing to keep market prices high through supply and demand and wishing to maximise capital return for their shareholders.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	10	Patricia	Dray	Highways England		<p>It is important that the adopted timescales for the plan take into account the wider context of the needs of the Greater Birmingham and Black Country Housing Market Areas (GBBCHMA).</p> <p>Consistency between neighbouring authorities with similar Local Plan time horizons would have benefits towards the coordination of these needs as well as the respective infrastructure requirements of each authority.</p> <p>A longer-term horizon for Bromsgrove would not be inconsistent with this however a shorter timescale may not allow for wider issues to be addressed in a coordinated way.</p> <p>A key consideration for Highways England will be the ability to assess the traffic implications of the plan with any degree of certainty, particularly for the long-time horizons. If the spatial option identified by the Council requires significant time to become fully developed we concur that a longer time horizon may be necessary. On that basis we suggest that 2036 be the initial choice but with 2041 if circumstances suggest that that build-out and infrastructure requirements dictate a longer period.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	16	Rebecca	McLean	Severn Trent		<p>Option 3 - A longer planning horizon will help Severn Trent Water to plan for the longer term strategy of infrastructure investment in our catchments. We are required to produce a Drainage and Waste Water Management Plan up to a minimum of 25 year time period, therefore understanding the proposed growth in a catchment in the longer term will help our plans focus in the right areas.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	17	Stuart	Morgans	Sport England		<p>Sport England has no specific comments to make on the preferred plan period, but considers that the evidence base to support the Local Plan review will need to cover the plan period accordingly. In respect of Sport and Recreation facilities, in accordance with paragraph 96 of the NPPF, planning policies should be based upon robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative and qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreation provision is needed, which plans should then seek to accommodate.</p> <p>Sport England's advice is that assessments of sports facility needs (both indoor and outdoor) should be prepared every three years to ensure that they remain up-to-date and robust (or every five years if supply and demand monitoring takes place on an annual basis).</p> <p>Detailed guidance on the importance of having robust and up-to-date assessments of sports facility needs for underpinning local plan policies is set out in Sport England's 'Planning for Sport – Forward Planning Guide' (2013).</p> <p>Sport England is strongly of the view that for the District Plan Review to accord with the guidance in paragraph 96 of the NPPF, it is necessary to commission an update to the Playing Pitch Strategy and a new Built Sports Facilities Strategy.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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SI4	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Strongly recommend that the plan should include mechanisms for rolling review and the opportunity to embed specific policy directions that need to last beyond the plan horizon. Strategic and long term protection/enhancement of the natural environment should stretch beyond the lifetime of the plan and will need to be embedded in plan policy. Relevant issues could include consideration of safeguarded land ; biodiversity enhancement; ecological mapping and the environmental evidence base; long term GI Objectives for major district assets and a robust Green belt review approach. This would allow for review and reaction to changing environmental, economic and demographic circumstances.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	20	P	Harrison	Wythall Parish Council		We consider that the Plan should cover the period 2018 – 2046 because it will take many years before it is finally approved and adopted, and it needs a longer-term view to ensure that appropriate infrastructure is provided in a timely manner.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	21	Martin	Dando	Birmingham City Council		Although there are benefits in having a longer plan period up to 2036 or 2041, an increased time period will also mean that the Review will need to plan for higher numbers of housing and increased employment provision over the longer time period. Given that the Government is stipulating that Plans will need to be regularly reviewed, new evidence may necessitate changes to housing and employment requirements in the short to medium term which may mean that a shorter plan period for this Review may be preferable.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	22	Carl	Mellor	Black Country Authorities		2018 – 2036 would tie the Plan to the same proposed timescale as the Black Country Plan and would give the plan the minimum of 15 years allowed after the proposed target date for the adoption of the Plan in 2021. There would be advantages to the Plan being set as the same timetable as the Black Country Plan in that it would provide a consistent evidence base across both areas allowing for a more straightforward approach to any Statement of Common Ground.  Local planning authorities as a whole should always anticipate for possible changes and provide flexibility within plans. Nevertheless, longer periods up to 2041 or 2046, could also mean that there would be greater uncertainty as to the validity of future population and economic projections and necessitate the allocation of a greater quantum of land for development whilst those uncertainties remain.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	28	Emily	Barker	Worcestershire County Council		Support the longest timetable for the Plan to enable long term planning and delivery of infrastructure, including schools and transport. Opportunity to take a longer term view is important to enable the appropriate plans and business cases to be developed, for funding to be secured and for schemes to be delivered with the certainty that a future plan will not take a significantly different approach to development. Also be significant merit in planning to 2041 as there are a number of other plans in Worcestershire which are coming forward on this timeline, this may bring advantages for the development and delivery of infrastructure , especially cross boundary infrastructure.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	31	Rachel	Jones	Better Environment Theme Group		Length of plan - the group acknowledged that although the plans are reviewed on a five-year basis it would be most appropriate if the length was 15-20 years to enable long term planning but should to align and work in partnership with other local plans such as the SWDP, regional, and national policies.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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SI4	33	Steve	Colella	District Councillor		It is recommended that the full plan period is to be utilised with early years development to be based on growth around areas that have either previously been excluded from growth because of village envelopes or existing Greenbelt restrictions or have identified a local housing needs through neighbourhood planning process. Care should be taken in suggesting a longer development plan period as not to kick the problem down the road leaving future challenges to future generations. A decision today might be reasonable but to future generations could be seen as adding a disadvantage, especially when making plans where to live later in life. The lack of adopting plans in a timely fashion is a cause of the planning system plus the building industry wishing to control market prices through supply and demand and an investors wish to maximise return on Capital.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	34	Sue	Baxter			I consider that the Plan should cover the period 2018 – 2046 to enable the appropriate infrastructure to be planned and implemented.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	35	Peter	King	Campaign to Protect Rural England		Some buffer at the end of the plan is desirable. It is also desirable that Green Belt Review should be infrequent events. On the other hand, the further out a plan goes into the future, the more likely it is to be overtaken by events. We would suggest that about 2040 is an appropriate end date. It must be born in mind that brownfield land is not a finite resource. As the economy changes, old industrial sites are falling out of use and new employment sites developed. This is a continuous process, but it is not possible for a plan to identify what brownfield sites will be available for redevelopment: they are essentially large windfalls. When the Bromsgrove Plan failed at enquiry in c.1998, it was because the Inspector was not willing to allow the council to rely on windfalls, but in the event, the council's view proved correct: so many brownfield sites came forward that the council had to impose a housing moratorium. Having too long a plan will mean that an unnecessarily large amount of green field land has to be released. This is liable to prejudice the developability of windfall brownfield sites.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	36	Conrad	Palmer	Fairfield Village community Association		2018-2041	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	38	Sue	Green	Home Builders Federation		The 2018 NPPF states that strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long term requirements (para 22). The Council's proposed plan period of 2018 – 2036 should provide an adequate timescale.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	39	Andrew	Carter	Homes England		The review of the Local Plan presents a timely opportunity for Bromsgrove to plan beyond the normal 15 year horizon. It would be prudent therefore in this review process to ensure that future time horizons were accounted for to allow a more certain and robust Plan being produced. On this basis, the Plan should cover the period to 2041 as a minimum. This could include safeguarded sites for the final five years of the plan i.e. 2036-41 which then feed into the next review when population projections, and housing need are more established.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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SI4	42			Wythall Residents Association		The Plan should cover the period 2018 – 2046 because it will take many years before it is finally approved and adopted, and it needs a longer-term view to ensure that appropriate infrastructure is provided in a timely manner.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Given the complexities, it is considered that the timeframe could easily be delayed to beyond 2021, 2023 should be considered as the starting date for the plan period. Only consider options 2 and 3 to provide sufficient flexibility to safeguard against delay in the preparation of the Plan Review. Consider that the Plan Period should cover the longest period possible to provide certainty. Consider Option 3 to be the best Plan period.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	The proposed plan period should accord with the requirement in Paragraph 22 of the NPPF and plan for a minimum of 15 years. It should also be aligned with other authorities within the Greater Birmingham Housing Market Area (HMA) in line with the guidance contained in the National Planning Practice Guidance (NPPG) to ensure a holistic regional approach. The Council may wish, however, to consider a longer plan period to allow for any potential slippage in the progress of the LPR noting that the adopted Plan requires the review to be completed prior to 2023. In this respect, we would propose that the plan period be amended to be 2018 – 2041.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	47	Michael	Jones	Caddick Land		2018-2041	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	The issues and options sustainability appraisal report considers 4 options for timescales of the new plan; 2018- 2036; 2018 to 2041 and 2018-2046. Options 1 to 3 involves the same annual rate of development but over different timescales. In accordance with advice contained within the revised NPPF, that requires the identification of housing land for 10 to 15 years, it would seem pragmatic to require the new plan to cover the period from 2018 to 2036.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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SI4	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>Claremont Planning, on behalf of Spitfire Home's, are of the view that the most appropriate time period that the new Plan should cover is 2018 to 2036. This ensures that the Plan remains relatively in line with other Plan periods of adjacent authorities such as the Birmingham Development Plan and the emerging Black Country Core Strategy which is also covering the period to 2036. This ensures that the emerging Plan is able to more effectively execute its statutory requirement to work with neighbouring authorities through the Duty to Co-Operate.</p> <p>Other options to extend the period to 2041 or 2046 would be an inappropriate approach that would establish an ineffective strategy to deliver the required growth to meet the needs of the District. Extending the period beyond 2036 does not promote a reflexive approach that will best be able to effectively implement development management. Given that variables beyond the Council's control may take effect in the next 10 years, such as changes in the economy and high-level fluctuations in housing market conditions, it would not be appropriate to over-extend the Plan period. These considerations are important factors in respect of ensuring housing delivery and addressing housing need through an appropriate development strategy, with future trends likely to be influenced by these material impacts on the identified need. The longer time periods considered would limit the ability of the Plan to respond to factors that affect delivery and housing requirements as well as restrict the Council's assessment of effectively implementing its development management policies in respect of fostering the required growth to meet the identified need of the District.</p> <p>As such, extending the period beyond 2036 would not demonstrate a sound approach and cannot be underpinned by justifiable evidence, given the risks that would arise over a substantially longer Plan period. Given the existing pressures that Bromsgrove's faces alongside wider contextual influences that could give rise to changes in conditions beyond the District's control, it is a sensible and suitable approach to select the period to 2036 rather than any longer period of time.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	52	Tom	Ryan	Claremont Planning	Bellway Homes	<p>Claremont Planning, on behalf of Bellway Homes, are of the view that the most appropriate time period that the new Plan should cover is 2018 to 2036. This ensures that the Plan remains relatively in line with other Plan periods of adjacent authorities such as the Birmingham Development Plan and the emerging Black Country Core Strategy which is also covering the period to 2036.</p> <p>Other options to extend the period to 2041 or 2046 would be an inappropriate approach which would establish an ineffective strategy in delivery the required growth to meet the needs of the District. Extending the period beyond 2036 does not promote a reflexive approach that will best be able to effectively implement development management. Given that variables beyond the Council's control, such as changes in the economy and high level fluctuations in market conditions, it would not be appropriate to over-extend the Plan period due these considerations that could cause material impacts on the identified need.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	<p>The most appropriate time period that the new Plan should cover is 2018 to 2036. This ensures that the Plan remains relatively in line with other Plan periods of adjacent authorities such as the Birmingham Development Plan and the emerging Black Country Core Strategy which is also covering the period to 2036. This ensures that the emerging Plan is able to more effectively execute its statutory requirement to work with neighbouring authorities through the Duty to Co-Operate.</p> <p>Other options to extend the period to 2041 or 2046 would be an inappropriate approach which would establish an ineffective strategy in delivery the required growth to meet the needs of the District. It does not promote a reflexive approach that will best be able to effectively implement development management. Given that variables beyond the Council's control, such as changes in the economy and high level fluctuations in market conditions, it would not be appropriate to over-extend the Plan period due these considerations that could cause material impacts on the identified need. This would limit the ability of the Plan to effectively implement its development management policies and foster the required growth to meet the identified need of the District.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	54	Katherine	Else	Claremont Planning	Miller Homes	<p>The Plan should cover is 2018 to 2036. This ensures that the Plan remains relatively in line with other Plan periods of adjacent authorities such as the Birmingham Development Plan and the emerging Black Country Core Strategy which is also covering the period to 2036. This ensures that the emerging Plan is able to more effectively execute its statutory requirement to work with neighbouring authorities through the Duty to Co-Operate.</p> <p>Other options to extend the period to 2041 or 2046 would be an inappropriate approach which would establish an ineffective strategy in delivery the required growth to meet the needs of the District. Extending the period beyond 2036 does not promote a reflexive approach.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI4	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	<p>Given the stated need for a Green Belt review, the scale of development proposed, and the need to plan for strategic infrastructure to support new growth, we strongly support preparing a local plan which provides as much certainty for local communities as possible over the long term on these issues. Having shorter term plan periods (such as to 2036) - particularly for Green Belt Review which is intended to secure new permanent Green Belt boundaries over the long term – runs the risk of a continual cycle of piecemeal and incremental development allocations without adequate supporting infrastructure (or unable to deliver strategic infrastructure), nor the ability to establish new long term boundaries for the Green Belt.</p> <p>The District should therefore look to fix a local plan period to at least 2041. The removal of land from the Green Belt (or indeed, the creation of new compensatory Green Belt) should be made in the context of development allocations for the plan period and beyond, either by specifying the contribution the strategic land allocation might make within the plan period (with additional planned growth beyond) or removing land from the Green Belt as a ‘strategic reserve’ or ‘protected land for long term development’ to meet growth needs beyond the plan period.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	<p>It is recognised that changes in economic and demographic forecasting methods and other policy directions may influence the pace and scale of growth requirements during plan periods. Thus, in planning for a longer plan period, the Council should build in the ability for the plan to review and if necessary take into account any change in circumstance that may arise, for example changes in housing need. This need not necessitate a change of direction in the long term spatial growth strategy but would allow a ‘sense check’ of delivery rates, site availability and the bringing forward or re-prioritising of any additional strategic reserves needed to reflect these changes in circumstance.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	57	Karin	Hartley	Delta Planning	Bloor Homes Western	<p>As set out in the consultation document, the Council is aiming to adopt the Local Plan in 2021 and as strategic policies should look ahead over a minimum 15 year period from adoption, the local plan period should extend to 2036 as a minimum. However, this does not allow for any delays in the preparation of the Local Plan and we therefore consider that a plan period to 2041 would be more appropriate.</p> <p>A longer period will also enable the Local Plan to better respond to long-term requirements and opportunities and to ensure that the District grows in a sustainable way. This is particularly important as land will have to be released from the Green Belt in order to meet housing and employment land requirements.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	58	Karin	Hartley	Delta Planning	Bloor Homes Western & Maximus	<p>As set out in the consultation document, the Council is aiming to adopt the Local Plan in 2021 and as strategic policies should look ahead over a minimum 15 year period from adoption, the local plan period should extend to 2036 as a minimum. However, this does not allow for any delays in the preparation of the Local Plan and we therefore consider that a plan period to 2041 would be more appropriate.</p> <p>A longer period will also enable the Local Plan to better respond to long-term requirements and opportunities and to ensure that the District grows in a sustainable way. This is particularly important as land will have to be released from the Green Belt in order to meet housing and employment land requirements.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	59	Karin	Hartley	Delta Planning	Maximus	<p>Option 2 - the Local Plan should look ahead over a minimum 15 year period from adoption, if adopted in 2021, the local plan period should extend to 2036 as a minimum. However, this does not allow for any delays in the preparation of the Local Plan and we therefore consider that a plan period to 2041 would be more appropriate.</p> <p>A longer period will also enable the Local Plan to better respond to long-term requirements and opportunities and to ensure that the District grows in a sustainable way. This is particularly important as land will have to be released from the Green Belt in order to meet housing and employment land requirements.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI4	60	Sara	Jones	Delta Planning	Moundsley Healthcare	To allow for delays in the preparation of the Local Plan and we therefore consider that a plan period to 2041 would be more appropriate.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	The Local Plan should cover a period of 2018-2036, this would align with the GL Hearn report which has set 2036 as one of the bench marks for housing provision within the HMA. Having the same plan period as neighbouring authorities which fall within the same HMA will allow for cross boundary co-operation.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	63	Fiona	Lee-McQueen	Framptons	Bellway Homes	It would be reasonable to for the Plan period to align with the GBHMA Strategic Growth Study up to 2036. However, having regard to the fact that Bromsgrove District is predominantly Green Belt, the Plan will have to provide for well beyond the Plan period of 2036 as Bromsgrove District Council will have to allocate land for approximately 6,500 dwellings in this period to meet their own need (assuming that there are no changes to the 'current' standard methodology of calculating OAN) and then identifying and allocating land for any of Birmingham's unmet housing need, together with safeguarding land to meet longer term needs.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	64	Peter	Frampton	Framptons	Mr I Rowlesge	A longer timescale in the plan period will provide the directions of growth for infrastructure providers to meet growth requirements.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	65	Louise	Steele	Framptons	Summix Ltd	It would be reasonable to for the Plan period to align with the GBHMA Strategic Growth Study up to 2036.  However, in terms of safeguarding land to meet longer-term needs, the Plan will have to provide for well beyond the Plan period of 2036 as Bromsgrove District Council will have to allocate land for approximately 6,500 dwellings in this period to meet their own need and then allocate land for any of Birmingham's unmet housing need. It is considered that this would be in the form of releasing land from the Green Belt.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	68	Nicole	Penfold	Gladmans		Support the proposed plan period.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	69	Latisha	Dhir	GVA	St Phillips	The emerging plan should be prepared in line with a timeframe of 23 years, supporting Option 2 from 2018-2041. This will accommodate the long term vision the Council have expressed to provide strategic infrastructure, together with the wider housing matters affecting neighbouring authorities.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI4	72	Stephen	Peters			I consider that the Plan should cover the period 2018 – 2046 because it will take many years before it is finally approved and adopted, and it needs a longer-term view to ensure that appropriate infrastructure is provided in a timely manner.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	75	Rachel	Mythen	GVA	Taylor Wimpey	The Plan should be prepared with a time frame of 23 years and the adoption of Option 2 (2018-2041) is supported. This will accommodate the longer term vision of the Council to provide strategic infrastructure, together with the wider housing matters affecting neighbouring authorities.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	76	Emily	Vyse	GVA	University of Birmingham	If, as the Council hopes, the replacement BDP is adopted in 2021, it will need to look forward to at least 2036 in order to comply with national planning policy and, therefore, be sound. However, to allow for slippage and to provide flexibility, we would recommend that the Council prepares a Plan for the period to 2041. Other Plan reviews undertaken in parallel should either adopt the same period in accordance with a formally agreed Statement of Common Ground or should, at the very least, be underpinned by common evidence and agreements on housing need and distribution.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	78	Sean	Rooney	Harris Lamb	Barratt Homes	The NPPF confirms that Strategic policies should look ahead over a minimum 15 year period from adoption. We would be supportive of planning for a longer timeframe. The further the council look ahead, the more land would be required to be removed from the Green Belt and safeguarded. We suggest that the council look ahead to at least 2046. This would allow two further Local Plan Reviews before the Green Belt Issues would need to be considered again.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	79	Shamim	Brown			I think the suggestion of 15 years is satisfactory.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	80	John	Pearce	Harris Lamb	Bloor Homes	In light of the need for Green Belt boundaries to endure beyond the end of the Plan Period, we contend that the Council should be looking to plan as a minimum to at least 2041, so that the revised boundaries endure beyond the current Plan Period and provide a long term strategic framework within which development can be guided without having to reconsider amending the Green Belt every time the Plan is reviewed. Taking a long term view in respect of the future growth of the District and meeting the wider needs of the HMA will necessitate a considerable amount of development. We contend that the Council should be bold and take a robust approach in identifying sites to meet both the District's and Birmingham's unmet needs over the emerging Plan Period but also in looking at the future development needs of the settlement and considering how it can grow in the future. We would, therefore be supportive of planning for a longer timeframe if this was undertaken in conjunction with a robust review of the current Green Belt boundaries and looked to safeguard land for well beyond the current Plan Period.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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SI4	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Adopting the plan in 2021 would mean the minimum plan period would be until 2036. However the NPPF confirms that when dealing with Green Belt boundaries, plans should be able to demonstrate they will not need to be altered at the end of the plan period. It could be argued that the Council should be looking to plan to at least 2041, but also potentially 2046, with more land removed from the Green Belt or safeguarded than if it were only planning to 2036. We would be supportive of a longer timeframe.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Guidance in paragraph 139 of the Framework confirms that when defining Green Belt boundaries, plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. In light of this, there is an argument to say that the Council should be looking to plan to at least 2041, but also potentially 2046. Clearly, in planning for a longer time period, the Council would need to remove more land from the Green Belt and safeguard it than if it were only planning to 2036. As such, we would be supportive of planning for a longer timeframe of at least 2046.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	NPPF Para 139 confirms that when defining Green Belt boundaries, plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. Therefore, there is an argument to say that the Council should be looking to plan to at least 2041, but also potentially 2046. In planning for the longer time period, the Council would need to remove more land from the Green Belt and safeguard it than if it were only planning to 2036. We would be supportive of planning for a longer timeframe of at least 2046.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	86	Rebecca	Anderson	Iceni Projects	Generator Developments	We consider that Option 3 (2018-2046) is the most appropriate timescale for the Plan period. The NPPF (Paragraph 22) states that strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities. Also, the NPPF (Paragraph 139) states that when defining Green Belt boundaries, plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period and Paragraph 136 states strategic policies should establish the need for any changes to the Green Belt boundaries, having regard to their intended permanence in the long term. We consider that the longest timescale (2018-2046) will allow the Council to take control of their Green Belt within the given time period, to meet housing need, and will consequently mean the Green Belt boundary will not need to be altered again in the short term as required by the NPPF.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	87			Indenture		Plan period should cover 2018-2041: justification being that allowing years to reach adoption, then provides 15 years to properly meet the plan	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>Instead, we consider that a Plan period of 2018 to 2041 would be more appropriate. Even with some slippage in the District Plan Review, this would clearly maintain a 15-year time horizon, but without taking such a long-term view that would cast doubt over the effectiveness of proposed policies, as may be the case with a Plan period that extends to 2046.</p> <p>Even though we support a plan period to 2041, we would underline the importance of regular reviews at least every five years, in accordance with the requirements of paragraph 33 of the revised NPPF.</p> <p>Such reviews will be important in ensuring that the Plan remains relevant to local circumstances and able to effectively guide the long-term growth and development of Bromsgrove District over the period to 2041 and beyond.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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SI4	89	Reuben	Bellamy	Lone Star Land	Cleint	The plan should cover a 20 year time scale, namely option 2) 2018 - 2041. The strategic policies, allocations and associated infrastructure are likely to need longer than 15 years to be delivered in a fashion consistent with sustainable development principles.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	90	Owen	Jones	LRM Planning	Persimmon Homes	On the basis that the NPPF requires that strategic policies in each Local Plan should look ahead over a minimum 15 year period from adoption, this means that the end date of the Review must be 2036 at the earliest. However, to allow for the possibility that the plan making process might be longer and that in the context of the need to amend the Green Belt, we believe the appropriate time horizon should be at 20 years time. This would represent a positive measure to provide a long term and strategic plan for the District. This would mean a plan period of 2018-2041. As the Local Plan Regulations allow for reviews at least every five years this provides scope for the strategy and allocations to be considered regularly throughout this period and this provides the flexibility to make adjustments should circumstances change.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	94			Nigel Gough Associates	Aniston Ltd	1,600 homes have been built since 2011 therefore in 7 years Bromsgrove has built less than 5% of the existing dwelling stock. Clearly unacceptable. On this basis it will take 140-150 years to replace the housing stock.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	94			Nigel Gough Associates	Aniston Ltd	Plan period should cover the 2018-41 period, justification being that allowing 4 years to reach adoption, this period then provides a minimum period of 15 years, to be consistent with current Government Guidance and in order to properly plan.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	95			Nigel Gough Associates	Monksgraston Ltd	The plan period should cover the period 2018 to 2041.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	96			Nigel Gough Associates	Mr Stapleton	The Plan should cover the period 2018 to 2041 to allow 4 years to reach adoption, then provide a minimum period of 19 years to plan meet the visionary aspirations of the Council.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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SI4	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	Plan period should cover 2018-2041 with the justification being that allowing 4 years to reach adoption, it then provides a minimum plan period of 15 years to meet the visionary aspirations of the District Council.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	98	Sally	Oldaker			I think it should be Option 1): 2018 - 2036 . . . as long as you get it sorted in time, because things change and need to be flexible. If it lasted until the 2040s there'd be no opportunity to change things part-way through.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	99	Mark	Dauncy	Pegasus	Gallagher Estates	Appropriate for the LPR to align itself with the study period of the SGS resulting in a plan period of 2018-36.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	100	Ryan	Bishop			Given the shortfall and targets 15 years would be a good target.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	103	Chris	May	Pegasus	Persimmon Homes	The Greater Birmingham Housing Market Area (GBHMA) Strategic Growth Study published in February 2018 identifies an updated housing need of between 256,000 – 310,000 dwellings between 2011 – 2036 for the GBHMA. This latest assessment also identifies the potential for approximately 22,000 dwellings of unmet need from the Black Country authorities by 2036.  However, given the length of time it is likely to take to undertake the District Plan Review, the plan period should run from 2018 to 2038.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	Considered the period 2018-2046 is the most appropriate plan period in order to facilitate permanent GB boundaries, considering additional long term development needs beyond 2046.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	To 2046. The Plan is not expected to be adopted until 2021. NPPF para 130 requires green belt boundaries to be 'permanent in the long term', and it would therefore seem undesirable for a future plan to again have to review the need to release further Green Belt land.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI4	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Option 3 - The preference is for the longest plan period, to improve certainty for both developers, the community and decision makers.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of SI4, the preference is for the longest plan period (option 3), to improve certainty for both developers, the community and decision makers.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	112	Gareth	Sibley	RCA Regeneration	Piper Group	Preference for the longest plan period to improve certainty for both developers, the community and decision makers.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	113	Gareth	Sibley	RCA Regeneration	CAD Square	In respect of SI4, the preference is for the longest plan period (option 3), to improve certainty for both developers, the community and decision makers.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	115	John	Breese	Rosconn Strategic Land		Option 1 - On the basis that if there are any delays to the current Local Development Scheme which proposes adopting the new Plan in 2021, then this period should roll forward so that it covers the minimum period of 15 years advised by NPPF paragraph 22.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	Should cover at least 15 years from adoption and potentially beyond that (up to 2046) consistent with the timeframe applied by ONS when publishing updated household projections and to allow effective forward planning to address current and future shortfalls in housing land provision.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	119	Darren	Oakley	RPS Group	Gleeson	RPS welcomes discussion on the timescale of the plan. RPS suggest that the local plan should cover at least 15 years from adoption (based on the Council's prediction this might cover 2021 to 2036), and potentially beyond that (up to 2046) consistent with the timeframe applied by ONS when publishing updated household projections and to allow effective forward planning to address current and future shortfalls in housing land provision.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI4	120	Michael	Davies	Savills	Cala Homes	The proposed plan period of 2018-36 should provide an adequate and comparable timescale. This accords with the SGS. However, there is still uncertainty around the housing shortfall in the GBHMA and this may have an effect on when this plan should be reviewed.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	122	Michael	Davies	Savills	Landowners	We consider that the plan period of 2018-2036 for the Bromsgrove District Plan Review is acceptable at this point in time. Local Plans are required to be kept up-to-date and reviewed every 5 years and we note that the Council anticipate having a plan adopted by 2021. However, there is currently uncertainty around the housing shortfall in the Greater Birmingham HMA and it is currently not clear when an agreement will be reached with all relevant local authorities on how this shortfall will be distributed/addressed which may have an effect on when this plan should be reviewed. Additionally, we consider that the plan period 2018-2036 accords with timeframe in the Greater Birmingham and The Black Country HMA Strategic Growth Study (February 2018) which is the most recent study that considers the HMA housing need, supply and shortfall. This means that further evidence base documents that come through following this date range will be able to better fit the parameters of the local plan.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	123	Michael	Burrows	Savills	Landowners	Option 1 is acceptable at this point in time. NPPF paragraph 22 identifies that Strategic Policies should look ahead for a minimum 15 year period from adoption. Local Plans are required to be kept up-to-date and reviewed every 5 years and it is noted that BDC anticipates having a plan adopted by 2021. However, there is currently uncertainty around the housing shortfall in the Greater Birmingham HMA and it is currently not clear when an agreement will be reached with all relevant local authorities on how this shortfall will be distributed/addressed, which may have an effect on when this plan should be reviewed.  Additionally, it is considered that the plan period 2018-2036 accords with timeframe in the SGS. This means that further evidence base documents that come through following this date range will be able to better fit the parameters of the Local Plan.  However there is merit in planning for a longer Plan period because this could assist with introducing more certainty for the future land supply position, assist with delivery through increasing the choice of suitable sites identified and assist with planning for more strategic infrastructure requirements.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	125	Alastair	Thornton	Simply Planning	Woodpecker Plc	In our view, an appropriate time period for the plan is 15 years. This will ensure sufficient flexibility in terms of responding to changing strategic aims etc.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	134	David	Barnes	Star Planning	Richborough Estates	Assuming, as intended, the Local Plan will be adopted in 2021 then there is potential for a 15-year period of 2021 to 2036. However, Richborough Estates would not object to a period of 2018 to 2041 or even 2046 because there will be the required 5-year reviews of the Local Plan.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI4	136	Kathryn	Young	Turley	Land Fund	<p>Our client considers Option 1 (2018 – 2036) to represent the most appropriate plan period. Option 1 is consistent with the requirements of the NPPF as set out above and reflects the Plan Period proposed in the Black Country Core Strategy Review and that of local plans being prepared in the wider GBHMA.</p> <p>An additional and compelling reason to support Option 1 is that it presents the most logical plan period in that the end date (2036) reflects the period examined in the Greater HMA Strategic Growth Study (GL Hearn, February 2018) (the 'Study'). The Study assessed the housing needs of the HMA between 2011 and 2036 and it is therefore logical for the LPR to plan for the period to 2036 as it aligns with the end date in this evidence base. This will also allow BDC to assess and agree with neighbouring authorities within the HMA an appropriate contribution towards the HMA's unmet housing need to 2036.</p> <p>The Council acknowledge through the BDP that land will be released from the Green Belt through the LPR. National policy establishes that: "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans" (para. 136)</p> <p>Whilst our client recognises the merits in planning for a longer timeframe as established in Option 2 (2018 – 2041) or Option 3 (2018 – 2046) it is imperative that local plans are able to respond to local circumstances and provide flexibility. In summary our client supports a plan period extending to 2036.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	137	Matthew	Fox	Turley	Redrow Homes	<p>The NPPF requires strategic policies to look ahead over a minimum 15 year period from adoption (para. 22). Option 1: 2018 - 2036 is therefore in line with the period the plan should cover in order to anticipate and respond to long-term requirements and opportunities and meet this national policy requirement, assuming it is adopted in 2021. The end date of 2036 is also consistent with other plans emerging across the HMA including the Black County Plan and Lichfield LPR.</p> <p>An additional and compelling reason to support the proposed end date of 2036 is the Greater Birmingham HMA Strategic Growth Study (GL Hearn, February 2018). This has assessed the housing needs for the HMA between 2011 and 2036 and the figures have been acknowledged in two position statements (February 2018 and September 2018) by the 14 Local Planning Authorities forming the HMA (including Bromsgrove). It is therefore logical for the LPR to plan for the period to 2036 as it aligns with the end date in this evidence base and allows BDC to assess and agree with neighbouring authorities within the HMA an appropriate contribution towards the HMA's unmet housing need to 2036.</p> <p>Whilst 15 years is the minimum plan timeframe advocated by the NPPF, planning for a longer term period may present issues for Bromsgrove because development requirements can obviously change significantly. Given that Bromsgrove contains extensive areas of Green Belt it is suggested that 2036 is a sound basis for the LPR, and safeguarded land can be released from the Green Belt to meet longer-term needs beyond 2036.</p> <p>In summary, Redrow support a plan period extending to 2036.</p>	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	151	Dawn	Macqueen			Timescales should reflect the long-term strategy perhaps 25 years and split down into five and 10 years sub plans which can be detailed in five year slots and reviewed on a regular basis.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	152	Sue	Skidmore			The length of plan should be 15-20 years. The situation is likely to change and so looking further would not be useful. It would be more efficient if planning cycles and reviews were bought into line with other agencies such as County Council and Severn Trent. A coordinated plan would have more impact.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI4	161	Ian	Macpherson		Self	The minimum 15 years is rather short for key infrastructure but beyond 20 years it is difficult to predict. The plan may not be adopted in 2021. Therefore the plan period should be to 2041.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	166	John	Gerner			Option 3 2018-2046, as major infrastructure projects necessary to enable growth and regeneration should be planned to meet demand over 30-40 years.  A short timescale may lead to poor land use decisions. Failing to protect a potential infrastructure corridor may make it impossible to deliver a future major infrastructure scheme.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	171	Mark	Cooper			QSI 4 - the time period should be simple and memorable, e.g. 2020/2040 Plan or the 2020/2050 Plan. Either could be shortened to the '2040 Plan' or the 2050 Plan'. It's unlikely much is going to happen in 2019 other than consultation (even less so in 2018!). And - particularly as the text states that the new District Plan is unlikely to be adopted until 2021 anyway. I would prefer the 2020 - 2050 Plan, with 'sub-plans' of 5-10 year timeframes to break down the key deliverables into smaller chunks.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	174	Michael	Corfield			2018-2036 It would be wrong to waste time and money planning for more than 18 years from now. We have no idea what will be required (e.g. all car driving may be autonomous with no-one owning their own car)	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	190	Philip	Ingram			The NPPF states strategic policies should look ahead a minimum of 15 years from adoption. The Council's proposed plan period of 2018-2036 may be appropriate, but will depend on the time it takes to produce and adopt the plan. A longer end date would help ensure the Plan extends over a suitable period. The review of the Green Belt should allow for boundaries which extend beyond the needs of the plan and include safeguarded land beyond the plan period.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	192			Dodford with Grafton Parish Council		Vision documents should cover long periods of time, but acknowledge that local circumstances (needs, environment, and (especially) politics) change, and so the implementation of the vision may need to be revisited and changed frequently. The challenge is to accommodate these changes without losing the essence of the vision.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.
SI4	194	Darren	Oakley	RPS	Clients	RPS welcomes discussion on the timescale of the plan. RPS suggest that the Local Plan should cover at least 15 years from adoption (based on Bromsgrove District Council's (BDC) prediction this might cover 2021 to 2036), and potentially beyond that (up to 2046) consistent with the timeframe applied by Office of National Statistics (ONS) when publishing updated household projections and to allow effective forward planning to address current and future shortfalls in housing land provision.	The NPPF requires that plans look ahead for a minimum of 15 years from adoption. Our current draft timetable indicates that we will adopt the reviewed plan by 2023 which would therefore lead to a plan period of 2023-2038. However in order to align with infrastructure planning at a Worcestershire County level, which includes the evidence to support the provision of strategic transport infrastructure, it is proposed that the new BDP will have a plan period of 2023-2040.

**Q.SI5: Do you think the Council should plan for significant employment growth above previous levels within the District or do you think Bromsgrove's residents should continue the trend of out commuting to access jobs?**



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SI5	1	Tammy	Williams	Alvechurch Parish Council		Until further infrastructure is provided and existing infrastructure issues are sorted out to alleviate the already overburdened district arterial routes, then No	Noted.
SI5	1	Tammy	Williams	Alvechurch Parish Council		Q.S1 5 presents an inappropriate choice Growing local businesses for the district residents to gain employment (and that pays well) is important to help create sustainable communities ,to contribute to the BDC funding base(as Local Government funding from central government diminishes) and to reduce travel to work requirements . This is an objective already adopted by the BDC Cabinet. However the wider, bigger and more diverse West midlands economy is also and inevitably going to keep providing jobs to which Bromsgrove's existing and future residents will be drawn.	Noted. Acknowledged that the question is not a complete either/or option. The purpose of this being included in the issues and options was to seek views on the existing balance of employment land/jobs provision internal to Bromsgrove District and those that are provided outside the District to which people commute to.
SI5	2	Gill	Lungley	Barnt Green Parish Council		The trend of out commuting to access jobs should continue. It brings wealth into Bromsgrove.	Noted.
SI5	4	Barry	Spence	Bentley Pauncefoot Parish Council		We believe out commuting will continue to be a major factor and Bromsgrove should not plan for significant employment growth.	Noted.
SI5	5	Kevin	Joynes	Beoley Parish Council		Any new employment development should not be in the Green belt, but from existing brownfield sites and commercial estates, many of which have vacant premises available.	Noted. The Plan Review will need to be in conformity with national planning policy (NPPF), in particular paragraph 137 with reference to this representation.
SI5	9	Alexandra	Burke	Hagley Parish Council		An exercise for rebalancing in the Bromsgrove TTWA may have some merit. Bromsgrove urban area has only 35.5% of the District's population. Embedding of technology has been totally ignored in new development. High-speed broadband should be a must. The increase in homeworking opportunities and take up should reduce the need to identify employment land by 30% with the sites released available for meeting housing needs.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections which will take account of issues such as the proportion of people homeworking.
SI5	10	Patricia	Dray	Highways England		Highways England is not best placed to judge the levels of employment needs of Bromsgrove, however the travel patterns that arise from the employment distributions are relevant to us. It is notable in this regards that Bromsgrove currently is a net exporter of labour resulting in travel behaviour that is 'tidal' in nature across peak hours on our network. This results in high levels of outbound traffic from Bromsgrove in the AM peak hours and corresponding high levels of inbound traffic flows in the PM.  The overall transport implications of this pattern of development are in principle less balanced and efficient with higher net implications for highway networks such as the SRN than for a similar size settlement benefiting from a more mixed pattern of development and greater internalisation of employment travel. Bromsgrove's context and economic function as part of the economies of Greater Birmingham and Black County and the wider Worcestershire area is important and the sustainability of these characteristics and potential for employment growth to affect them will be relevant in considering this question. In principle the suggestion that additional employment land release could increase the degree of internal movement within Bromsgrove district and reduce out commuting is a matter that should be explored further when specific locations and use types are considered.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review, including employment land proposals.
SI5	11	Rosamund	Worrall	Historic England		The Plan will need to consider the interrelationship between the historic environment and economic growth and infrastructure.	Noted. The site selection process informing the scale and location of development proposals will include consideration of the historic environment.
SI5	20	P	Harrison	Wythall Parish Council		We think considerably more employment needs to be provided WITHIN the District to reduce the need for costly and lengthy journeys to work in a period of uncertain personal transport options.	Noted.
SI5	21	Martin	Dando	Birmingham City Council		Bromsgrove should look to plan for its own needs but should also test if there are any further opportunities to meet any wider strategic employment needs across the sub-region. Bromsgrove's proximity to the conurbation, and the fact that the M5 and M42 motorways both cross through significant parts of the District, means that the District may be a suitable location for a strategic employment site to serve the wider West Midlands which could not otherwise be accommodated within the conurbation.	Noted. The District Council will continue to engage with neighbouring local authorities through the duty to cooperate on a range of matters including employment needs. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.

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SI5	22	Carl	Mellor	Black Country Authorities		<p>There will always be a significant trend of out commuting from Bromsgrove given its close location to Birmingham and the West Midlands conurbation. Nevertheless, the Plan should consider the potential for significant employment growth to meet the wider needs of Birmingham and the Black Country, as well as to provide for an appropriate scale of employment growth to meet local needs.</p> <p>The Black Country in particular has identified significant potential shortfalls of employment in the evidence so far gathered for the Black Country Plan. Whilst some of that potential shortfall might be met on sites within South Staffs e.g. I54, these primarily serve the north of the Black Country.</p> <p>However, there is also a potential shortfall of large sites to provide for employment needs in the south of the Black Country. It would therefore be helpful if the Review of the Bromsgrove District Plan could therefore investigate the possibility of identifying potential additional large employment sites to help serve the needs of the south of the Black Country particular on suitable and sustainable locations along the M5 and M42 corridors.</p>	Noted. The District Council will continue to engage with neighbouring local authorities through the duty to cooperate on a range of matters including employment needs. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	28	Emily	Barker	Worcestershire County Council		The ambition for less out commuting could have significant benefits to the transport network, the local economy and to Bromsgrove Town Centre.	Noted.
SI5	32	Robert	Spittle	Bromsgrove Economic Theme Group		<p>If Bromsgrove District has a strategic goal of pursuing an Economic Development growth undertaking then it has to address the need for significant employment growth, The EDTG brief is to support this undertaking therefore there is no doubt the trend of out commuting particularly with housing growth has to be reversed.</p> <p>Failure to do this creates the fundamental question of ‘dormitory’ town status, where Economic Development is still valid but in the context of supporting the lifestyle of its residents rather than creating the lifestyle.</p> <p>In order to progress with the Local Plan Bromsgrove has to be clear on the above, all the comments below assume this issue is tackled and that Bromsgrove will continue to move towards strategic economic growth thus finding a compromise with ‘dormitory’ town status, a status maybe preferred for the town by its neighbours.</p> <p>Where options are included, they have more relevance than others in the Plan.</p>	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	33	Steve	Colella	District Councillor		<p>The character of Bromsgrove must be considered when thinking about the district’s economic or employment land strategy. Alongside this approach there must be consideration to what Bromsgrove is up against. There is no doubt that this will be a severe challenge to match and better the market forces that exist in neighbouring conurbations. The settlements away from the town are commuter villages with small commercial and business centres sustained by local needs and some from near neighbouring communities.</p> <p>Therefore the need to identify employment land should be reduced by 30%, giving such sites over to meeting housing needs.</p>	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	34	Sue	Baxter			More employment needs to be provided within the District, however I consider that large employment sites need be placed along the arterial road system. with smaller sites within or close to settlements.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	35	Peter	King	Campaign to Protect Rural England		Rebalancing the homes and jobs is an appropriate strategy in the Bromsgrove Town travel to work area. Elsewhere, commuting is so ingrained that such a strategy will be doomed to failure. Any policy that is doomed to failure is undeliverable and hence unsound.	Noted.
SI5	35	Peter	King	Campaign to Protect Rural England		<p>If the conclusions of the Strategic Growth Study are correct, there is a need for new settlements which will all almost inevitably be dormitories for Birmingham and other commuters. Policies for rebalancing the economy between homes and employment in the outer zone are almost certainly bound to fail, without a degree of central planning of a kind only found where there is a totalitarian regime, something wholly alien to the British constitution.</p> <p>I submitted a paper analysing this in c.2013 in objecting to what ultimately became BDP. That was to a considerable extent dependent on data from the 2001 census, as the 2011 data was not then fully available, but I have no reason to suspect that the situation has changed in the slightest. No doubt your council can commission similar research based on more recent data.</p> <p>If the New Plan is based on more appropriate evidence as the economic geography of the district a more appropriate and sounder plan is likely to emerge.</p>	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI5	35	Peter	King	Campaign to Protect Rural England		The majority of the district lies in the shadow of Birmingham and the Black Country; and in the east of the district Solihull and Redditch. It is essentially a commuter-land, which is almost exclusively dependent on people being able to commute across the district boundary to work. That is a situation so ingrained that there is no realistic hope of changing it. This area is part of the Greater Birmingham and Black Country (GBBC) HMA. I will call this the outer zone.	Noted.
SI5	36	Conrad	Palmer	Fairfield Village community Association		Opportunities to reduce commuting by through local employment must be encouraged. Such employment provision within the District may encourage more usage of local public transport.	Noted.
SI5	38	Sue	Green	Home Builders Federation		The Council should plan for significant employment growth rather than continuing the trend of out commuting.	Noted.
SI5	39	Andrew	Carter	Homes England		M42 Junctions 1, 2, 3 are within the District and present opportunities for employment growth around and close to those junctions. The benefit of planning for employment growth within the District is the reduction in out-commuting from Bromsgrove to Birmingham which can be a more sustainable approach to a purely housing led agenda. Promoting housing growth with little or no supporting employment will create a trend of further out-commuting to Birmingham and Worcester.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	42			Wythall Residents Association		Considerably more employment needs to be provided within the District to reduce the need for costly and lengthy journeys to work in a period of uncertain personal transport options. Young people cannot afford the high travelling costs.	Noted.
SI5	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Support the delivery of significant employment growth. Important to consider what the level of housing need may be to support economic growth. Barton Willmore have prepared a Housing Needs Technical Note which explores this in more detail. There is clear evidence to suggest that the Council should be planning for significant employment growth above current baseline levels to ensure the GBSLEP aspirations are met. Current out commuting trends are wholly unsustainable.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	46	Ian	Mercer	Bruton Knowles	Church of England	The Council should plan for significant employment growth above previous levels within the District.	Noted.
SI5	47	Michael	Jones	Caddick Land		Bromsgrove is a net exporter of commuters especially to Birmingham. This has significant issues for the local and wider road network and is inherently unsustainable. Although Bromsgrove's proximity and relationship to Birmingham will mean that a sizeable proportion of its working population will inevitably look to Birmingham for work, it is an important planning objective to try to increase Bromsgrove's employment offering so as to try to reduce the level of out commuting as was the case for Stratford District Council's Local Plan.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	It is considered that the district is unlikely to be able to compete with the economic offer and draw of the larger settlements in the area (particularly Birmingham). As a result, out commuting is likely to remain important for many existing and future district residents. As such, the district should focus efforts on a spatial strategy which supports less travel, or more sustainable methods of travel to the larger centres of employment. Locations on the southern edge of Birmingham benefit from high levels of existing public transport provision and should therefore be considered favourably. Directing development to these locations would be a deliverable alternative to the allocation of separate standalone new settlements in more remote locations from Birmingham's centres of employment and other higher order destinations within the conurbation and would better support shorter journeys by public transport to be made from the earliest phase of development.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review.
SI5	58	Karin	Hartley	Delta Planning	Bloor Homes Western & Maximus	We do not consider that it is sustainable to continue these trends. The Local Plan should encourage significant economic growth in the District to provide new employment opportunities for the District's residents with the aim of reducing out-commuting. In response to Question Q.SI 6 [sic], we would therefore encourage the Council to plan for economic growth significantly above previous trends.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	59	Karin	Hartley	Delta Planning	Maximus	Encourage the Council to plan for economic growth significantly above previous trends. It is not sustainable to continue high levels of out commuting. The Local Plan should encourage significant economic growth in the District to provide new employment opportunities for the District's residents with the aim of reducing out-commuting.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	67	Robert	Davies	Gerald Eve	Client	We consider that employment growth should be supported. Specifically, in terms of both employment growth and business needs, the Bromsgrove District Employment Land Review highlights the demand for warehouse, distribution and manufacturing uses up to 2030.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.

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SI5	67	Robert	Davies	Gerald Eve	Client	It is considered that, in particular, there is an opportunity to specifically identify additional land over the life of the Plan for logistics related uses. By the very nature of such uses, they would need to be located close to junctions of the strategic road network and motorway junctions. Indeed paragraph 4.13 of the Issues and Options consultation highlights the strategic value of land which is located close to the strategic road network or motorway junctions. Such land should be positively identified and removed from the Green Belt.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of a labour demand scenario which will forecast future jobs growth in a range of sectors including B8 storage and distribution uses.
SI5	68	Nicole	Penfold	Gladmans		The Council should plan for significant employment growth rather than continuing the trend of out commuting.	Noted.
SI5	72	Stephen	Peters			I think considerably more employment needs to be provided WITHIN the District to reduce the need for costly and lengthy journeys to work in a period of uncertain personal transport options.	Noted.
SI5	78	Sean	Rooney	Harris Lamb	Barratt Homes	The council should plan for significant employment growth. In planning for additional employment growth there would also be a requirement to meet the needs of the employees by providing housing.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	79	Shamim	Brown			Economic growth will depend on demand and availability of a variety of skills in the workforce. Consequently, a variety of accommodations will be required.	Noted.
SI5	80	John	Pearce	Harris Lamb	Bloor Homes	We note that is additional employment growth is pursued as an objective of the Council this will necessitate additional land being identified for development over and above the current levels required to meet the Council's and Birmingham's unmet housing needs. We would, therefore, be supportive of further land being allocated to meet these various needs and would like to work with the Council on identifying suitable sites, such as the land at Frankley to meet these needs.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	80	John	Pearce	Harris Lamb	Bloor Homes	Planning for additional employment growth over and above existing levels would have the added benefit of hopefully allowing residents of the District to reduce their travel to work times and distances if employment opportunities become available within the District. Clearly, we would have no objection in principle if the Council decided to pursue this as an option.	Noted.
SI5	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	The Council should plan for significant employment growth over and above previous levels rather than continuing the out-commuting trend to access jobs. In planning for additional employment growth, there would also be a requirement to meet the needs of new employees including housing. Additional employment growth over and above the current known requirements for housing land would necessitate further land to be removed from the Green Belt.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	By planning for a significant additional quantum of employment development in the District over and above that which has previously been provided for, this would have the benefit of hopefully enabling residents of the District to have shorter commutes to work, rather than having to travel into Birmingham for example. Clearly, this would be a beneficial to existing and new residents alike and we would be supportive in principle of such a position should the Council decide to plan for this objective.  In planning for additional employment growth in the District, we note the link between this and the need to provide additional housing to meet the needs of new employees. The Council are already having to identify land for 2,300 dwellings to meet its own needs in the period up to 2030, as well as meeting a proportion of Birmingham's 37,900 unmet housing need. Planning for additional employment growth over and above the current known requirements for housing land would necessitate further land to be removed from the Green Belt. We would, therefore, be supportive of such a policy approach, as it would potentially create a greater need for land to be released from the Green Belt to meet the additional housing demand that would arise as a result.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Planning for a significant additional quantum of employment development would have the benefit of enabling residents to have a shorter commute to work. Supportive of such a principle. Planning for additional employment growth over and above the current known requirements for housing land would necessitate further land to be removed from the Green Belt.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI5	86	Rebecca	Anderson	Iceni Projects	Generator Developments	We consider that the Council should plan for significant employment growth. As stated in the Inspectors Report of the adopted Plan, all three employment growth forecasts contained in the North Worcestershire Housing Need Report (April 2014) (NWHNR) – which the previous Local Plan figure was based upon, suggest substantial growth in job numbers for the period 2012-2030. In accordance with the NPPF (Paragraph 103) that encourages the planning system, to manage patterns of growth on sustainable locations, we consider that the Council should plan for more economic growth within Bromsgrove, to reduce unsustainable patterns of commuting, and therefore encourage the use of sustainable methods of travelling to work, including public transport, walking and cycling. This can help to reduce congestion and emissions, and improve air quality and public health. his would also remain consistent with the approach in the previous Local Plan to seek to deliver a level of housing growth that will support economic growth in the District.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	89	Reuben	Bellamy	Lone Star Land	Cleint	Given the proximity of the conurbation and major employment areas such as Longbridge and the City Centre, it is clear that out-commuting will continue and the Local Plan needs to plan for this. However, it is important that the economy is re-balanced in order that out commuting is reduced (or at least does not unduly increase) for both environmental reasons and to enable those who cannot afford to travel the opportunity of work locally. The NPPF sets out at paragraph 80 that planning policies should help create conditions in which businesses can invest, expand and adapt...the approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	92	Andrew	Watt	Maze Planning Solutions	Client	Bromsgrove should plan for significant employment growth above previous levels in the District to reduce the trend of out-commuting to access jobs. The proposed review of Green Belt provides a once in a generation opportunity to alter and rebalance levels of housing and employment provision in the District.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	98	Sally	Oldaker			You should plan for growth within the district – it's best if we can keep jobs inside the district, to save people having a lengthy commute which ruins their work-life balance and clogs up the roads.	Noted.
SI5	99	Mark	Dauncy	Pegasus	Gallagher Estates	Supportive of planning for positive growth and welcome the provision of additional employment land , any planned increase in employment growth will invariably increase housing demand within the District, thus the need to plan for additional housing.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	100	Ryan	Bishop			I think we need a blend – we should certainly support employment within the area however we should not be too dependent on linking housing with local employment – looking at the growth of HS2 in neighbouring areas this is a great opportunity and as long as people have employment and have safe incomes that should be the overriding factor.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	103	Chris	May	Pegasus	Persimmon Homes	As part of the immediate hinterland of the West Midlands conurbation, the District will always have a high degree of out-commuting. However, it is correct to plan for higher levels of jobs growth within the District, and the resultant housing growth as necessary to support this.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	Employment Development should be well related to public transport corridors in order to facilitate permanent GB boundaries, considering long term development needs beyond 2046.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	The Council should plan for significant employment growth above previous trends in order to support sustainability and help reduce commuting.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	108	Chris	Quinsee	Q&A Planning Services	Client	We believe that the Council should be planning for significant employment growth. The Issues & Options consultation makes clear the attractiveness of employment locations in the District and the significant adverse impacts associated with the current high levels of out-commuting (Issues & Options Paras 4.9-4.11). It is evident that the existing property stock does not meet current needs and there is scope for some expansion, to the general benefit of the local economy.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Agree. Planning in line with past trends is likely to perpetuate past trends of suppressed growth. Out-commuting is particularly expensive for those travelling by rail and can therefore only work for those earning wages that are sufficiently high. Simply planning for housing growth without commensurate plans for jobs growth and a wide range of employment opportunities will just add more pressure on road and rail infrastructure that is already struggling during the am and pm peaks.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.

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SI5	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	SI5 asks whether significant employment growth should be planned-for and we agree it should. Planning in line with past trends is likely to perpetuate past trends of suppressed growth. Out-commuting is particularly expensive for those travelling by rail and can therefore only work for those earning wages that are sufficiently high. Simply planning for housing growth without commensurate plans for jobs growth and a wide range of employment opportunities will just add more pressure on road and rail infrastructure that is already struggling during the am and pm peaks.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	112	Gareth	Sibley	RCA Regeneration	Piper Group	Agree that significant employment growth should be planned for. Planning in line with past trends is likely to perpetuate past trends of suppressed growth. Paragraph 4.20 should be amended to "at least" the following number of dwellings.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	113	Gareth	Sibley	RCA Regeneration	CAD Square	SI5 asks whether significant employment growth should be planned-for and we agree it should. Planning in line with past trends is likely to perpetuate past trends of suppressed growth. Out-commuting is particularly expensive for those travelling by rail and can therefore only work for those earning wages that are sufficiently high. Simply planning for housing growth without commensurate plans for jobs growth and a wide range of employment opportunities will just add more pressure on road and rail infrastructure that is already struggling during the am and pm peaks.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	115	John	Breese	Rosconn Strategic Land		the Council should plan for significant employment growth above previous levels within the district. The District is noted for an imbalance between the types of jobs and pay available within the District and those which are available in the West Midlands Conurbation. Planning for significant economic growth within the District will encourage businesses to expand or locate within the District contributing to the Plan's stated vision to enable people to be provided with better access to jobs.  It must be acknowledged however that commuting in the District will continue to be important by virtue of the close proximity and existing public transport links to the West Midlands Conurbation. As such it is important that new housing is located in locations close to existing public transport nodes to minimise the negative aspects associated with commuting such as congestion and emissions in line with NPPF paragraph 103.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	There should be an appropriate balance between the provision of new homes and jobs if any rebalancing strategy is to succeed. Support investment in growing the local economy and the identification of additional employment land to provide access to jobs. Investment will also take advantage of the District's close proximity to the WM conurbation and the strategic highway and rail network.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	119	Darren	Oakley	RPS Group	Gleeson	To ensure that the local plan supports and promotes sustainable development consistent with national planning policy, there should be an appropriate balance between the provision of new homes and jobs, if any rebalancing strategy is to succeed. To this end, RPS supports investment in growing the local economy and the identification of additional employment land to provide access to jobs for existing and future residents, but also to take advantage of the district's close proximity to the WM conurbation and the strategic highway and rail network (as recognised in paragraph 4.13 of the Issues & Options document).	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	134	David	Barnes	Star Planning	Richborough Estates	The level of employment growth should be consistent with the scale of the housing requirements albeit some of the employment need related to adjoining housing market areas might not be provided within the District. It is reasonable to assume that in meeting the housing needs of the Birmingham and the Black Country these dwellings will be provided in locations whereby their occupiers would be able to sustainably undertake their economic activities within these adjoining areas.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
SI5	135	Fran	Rowley	Turley	IM Properties	Welcome the acknowledged need to grow the economy and for new allocations in Bromsgrove. Providing the right sites in the right place is critical to enable business growth and attract inward investment in line with the NPPF.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	135	Fran	Rowley	Turley	IM Properties	The M42 corridor is an asset which offers a key economic advantage and is an attraction for high value investment. There are opportunities to address identified employment needs along the corridor given that it is relatively unconstrained and undeveloped .	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	135	Fran	Rowley	Turley	IM Properties	With ref to NPPF para 82, it is vital that Bromsgrove's policies address the locational requirements of different sectors, which for storage and distribution includes a variety of scales in accessible locations.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.

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SI5	135	Fran	Rowley	Turley	IM Properties	Would encourage BDC to ensure a sufficient scale of employment land in accessible locations, close to the strategic transport network is identified.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	139	Glenda	Parkes	Tyler Parkes	Oakland Developments	In line with paragraph 72 of the NPPF, our Client considers it would be appropriate for the Bromsgrove to plan for larger scale developments with a mix of housing and employment uses, such as new settlements, provided they are well located and designed, and supported by the necessary infrastructure and facilities. This can help to meet identified housing and employment needs in a sustainable way. It could also meet the objectives set out in paragraph 104 of the NPPF. It is important that appropriate policies and land allocations are put in place to reduce out-commuting to improve local access to jobs. In this respect, our Client's site is well placed, it being close to the A435, for allocation for redevelopment to achieve a mix of employment uses, housing, and other community uses, such as a school, to create a local sustainable centre.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	161	Ian	Macpherson		Self	Should try to balance employment with the population as far as possible for sustainability purposes.	Noted.
SI5	165	Johanna	Wood			Yes council should plan for significant employment growth above previous levels. Bromsgrove is in a good strategic position both economically and geographically to be more attractive to many different types of business than it is currently.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	166	John	Gerner			Sustainable growth requires well paid jobs in Bromsgrove to reverse the trend of out commuting. This requires planning for significant employment growth above previous levels.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	171	Mark	Cooper			QSI 5: I've already part addressed this, but the answer depends on what Bromsgrove wants to be (now, and in the next 20-30 years). Is it sustainable as an out-commuter, or is there a strategic need to target the attraction of industry and associated services to support employment growth. In my opinion the trend of out-commuting access to jobs should continue.	Noted.
SI5	180	Nicholas	Rands			I don't think you will stop the trend of out commuting to access jobs but I do think you can plan to provide employment sites next to good transport links which will reduce out commuting. You state in 4.10 that existing employment stock is well used and that there is very little vacant property yet several sites on Buntsford Drive remain empty and have been for years!! I believe that this is because the transport infrastructure for this location is poor.	Noted. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
SI5	192			Dodford with Grafton Parish Council		There will be no new land, so the development of large new physical facilities seems unlikely. The improvement of train services means that the role of Bromsgrove as a commuter 'dormitory town' is likely to accelerate, and (if the social infrastructure allows) should be encouraged.  However, the physical environment of North Worcestershire is very attractive, and the increasing trend in homeworking could be used to advantage in our district: with real superfast Broadband, and the right facilities (retail, restaurants, study, cinema, etc), Bromsgrove could become the 'go to' destination for high earning, middle class home workers.	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections which will take account of issues such as the proportion of people homeworking.
SI5	194	Darren	Oakley	RPS	Clients	To ensure that the Local Plan supports and promotes sustainable development consistent with national planning policy, there should be an appropriate balance between the provision of new homes and jobs, if any rebalancing strategy is to succeed. To this end, RPS supports investment in growing the local economy and the identification of additional employment land to provide access to jobs for existing and future residents, but also to take advantage of the District's close proximity to the West Midlands Conurbation and the strategic highway and rail network (as recognised in paragraph 4.13 of the BI&O document).	Noted. Further evidence on the district's employment needs will be collected to inform the plan review, including employment land requirements on the basis of labour supply projections informed by housing needs evidence.
<b>Q.SI6: Are there infrastructure improvements that will specifically help to encourage employment growth within the District?</b>							
SI6	1	Tammy	Williams	Alvechurch Parish Council		Yes as mentioned in the answer above to QSI 5. Significant improvement to the A38 around Bromsgrove is the priority for any additional business growth in the District.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area. Any further development allocated through the Plan Review will need to ensure that impacts on the transport network can be cost effectively mitigated to an acceptable degree (NPPF #108).

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SI6	1	Tammy	Williams	Alvechurch Parish Council		Reducing Commuter traffic in the district. This points to the need for better bus and rail connectivity between Redditch and Bromsgrove, for rail services with more interconnection for travellers from Redditch and Bromsgrove at Barnt Green station and for bus services linking Alvechurch and Barnt Green stations within more frequent buses at peak periods. Station vehicle parking enlargement with associated attention to car and public transport road access to these parks will be a requirement.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. A multi-modal approach to transport provision and consideration of the network will be crucial to provide evidence to support sustainable growth.
SI6	1	Tammy	Williams	Alvechurch Parish Council		Short to Midterm considerations (serving district employment growth and with wider West Midlands benefits) include: A better, more complete up- grade of the A441 from Birmingham through Hopwood and after the Alvechurch Bypass to Bordesley. This will be essential to cope with (already growing) greater traffic volumes and to protect the wellbeing of local residents. Ultimately a bypass for Hopwood and for Bordesley will be needed, the more so if the intention is taken forward for more business sites to be created along the M42 between junctions 2 and 3.	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	1	Tammy	Williams	Alvechurch Parish Council		Q.SI 6 covers infrastructure to support in district business growth. For a district with both a growing economy and a growing number of homes with the population increases from among existing residents and those newly arriving in the district ,the midterm infrastructure requirements are significant ( and way beyond the timid approach in the WCC LTP4 document)	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	2	Gill	Lungley	Barnt Green Parish Council		Infrastructure improvements should include transport - Bromsgrove western by-pass, A38 and A441 improvements.	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	4	Barry	Spence	Bentley Pauncefoot Parish Council		The highway network around Bromsgrove suffers significant congestion, particularly at peak times. In particular the A38 and its main junctions should be improved to facilitate vehicle movements. In addition, improvements to the communications by means of improved broadband for example would assist and encourage businesses.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area. Any further development allocated through the Plan Review will need to ensure that impacts on the transport network can be cost effectively mitigated to an acceptable degree (NPPF #108).
SI6	9	Alexandra	Burke	Hagley Parish Council		Hagley PC supports the Hagley Neighbourhood Plan Group response. A456 - The consultation fails to mention the problems caused by peak time congestion. Most obvious solution is a bypass from A456 to A491. A491 - severely congested at peak times between M5 J4 and the Stoneybridge Island and to some extent Bell End. Capacity on the latter section can easily be improved by restoring it to being a dual carriage way. The entry from the roundabout into A491 needs to be widened, at the expense of the verge and layby, so that two lanes of traffic leaving the roundabout can run together for a further distance. A longer ghost land in the centre of the road up to M4551 Money Lane Section of Sandy Lane going up the hill towards Stoneybridge Island should be widened to two lanes eastbound to enable cars to pass slow lorries.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. A multi-modal approach to transport provision and consideration of the network will be crucial to provide evidence to support sustainable growth. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	10	Patricia	Dray	Highways England		It is accepted by Highways England that accessibility to the SRN is often an important component in promoting / supporting employment sites however access to public transport, including fast and direct services to key labour markets is also vital to supporting locations or employment.  Bromsgrove district has recently benefited from significant investment into rail services at Bromsgrove station whereby the new station and enhanced train services present a major opportunity to increase the district's connectivity. Improvements to walking and cycling routes will be necessary at this location to improve the permeability of access to the station from the key employment areas in the south of the town. Current physical barriers to access to the rail station from Garrington Road result in elongated walking / cycling routes which remove much of these employment locations from the walking catchment for Bromsgrove town station. A south western entrance to the station is therefore vital for supporting employment in these locations.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. A multi-modal approach to transport provision and consideration of the network will be crucial to provide evidence to support sustainable growth. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI6	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council note that the A38 is not fit for purpose - we suffer from crippling traffic and congestion problems in the district - the town would benefit from a western bypass	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area. Any further development allocated through the Plan Review will need to ensure that impacts on the transport network can be cost effectively mitigated to an acceptable degree (NPPF #108). A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review.
SI6	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Green Infrastructure asset enhancement should be included in any list of strategic infrastructure that will specifically help to underpin employment growth within the district. A well connected and resilient GI network can provide essential ecosystem services such as pollution amelioration and flood control as well as biodiverse and scenic landscape that is more attractive. GI can help promote wellbeing and healthy lifestyles.	Noted. Agreed that the multi-functional benefits of the GI network should be recognised and evidence on different aspects of the GI network will need to be collected to support proposals in the Preferred Option of the Plan Review.
SI6	20	P	Harrison	Wythall Parish Council		The County Council needs to plan for and deliver major road improvements to ease congestion and permit easier travel within the District and cut pollution levels.  Access by HGVs into and within the Stoke Prior commercial zone is hindered by the existence of low railway bridges. There is an urgent need for an improved road link to the M5 motorway. The area then has the potential for further employment growth.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review, in particular the accessibility to either existing or potential employment sites in the District. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	28	Emily	Barker	Worcestershire County Council		Timely provision of employment land and building to meet the Strategic Economic Plans ambition for the county.	Noted. An employment land needs assessment will inform the employment development proposals such as land allocations which are included in the Plan Review.
SI6	29	Daniel	Atiyah	Wyre Forest District Council		Given the proximity of Bromsgrove District to the centre of England and its second city further employment land could be allocated in the plan period, currently at 28ha. The district is well connected to two motorways and has five railway stations, and borders Birmingham to the north. The proposed HS2 station near Birmingham Airport will also further improve the transport connectivity for Bromsgrove District.	Noted. An employment land needs assessment will inform the employment development proposals such as land allocations which are included in the Plan Review.
SI6	32	Robert	Spittle	Bromsgrove Economic Theme Group		The Plan documents tackles well the differences in infrastructure, not combining everything with transport for example. However, clearly there can be improvements to infrastructure, the town needs to use its leverage for example with Worcestershire to maintain growth in digital connectivity, with Broadband connections being 100% available and reliable to all employers, homeworkers and ultimately residents no matter how rural in an acceptable timeframe. It must also ensure that it is at the forefront of 5G technology, again where Worcestershire has made significant gains in its promotion.  Transport infrastructure is covered more specifically further on, however, with all infrastructure related target areas it is paramount that Bromsgrove creates a strong relationship with its partners where solutions can be created by all bodies working together rather than constituent parts doing what is right for them. An example of this is Bromsgrove Council, Highways England and Worcestershire County Council.	Noted. The District Council will work with the County Council on the issue of broadband provision, building on the work currently undertaken as part of the 'Superfast Worcestershire' project.  Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review, and work on this evidence gathering will be alongside both Worcestershire County Council and Highways England, as well as other partners.
SI6	33	Steve	Colella	District Councillor		The road intersections across the district can be seen as a negative and barrier for inward business investment. Whilst the geographical makeup of the district suggests the motorway, rail and airport links should be an economic attraction the congestion and difficulty there is in traversing the district is a negative aspect. The lack of take up of 700 sq meters of development land identified for commercial use on the Cala site (Hagley) has failed to be sold and is now subject to a care home planning application. This is a lesson learnt for the economic development team.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	34	Sue	Baxter			Highways. Education (further education facilities to provide local vocational training)	Noted. The District Council will continue to engage with the local education authority (WCC) through the duty to cooperate to provide evidence on the educational needs to support proposed residential and employment allocations.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI6	35	Peter	King	Campaign to Protect Rural England		<p>A38 between the end of the Bromsgrove bypass and M42 J1 is a congestion hotspot. If the area between M42 and Bromsgrove, west of Lickey End is released for development, there will be an opportunity to use developer funding to make improvements in this area:</p> <ul style="list-style-type: none"> <li>•Dualling this length of A38 (which would require CPOs in respect of a few houses) or</li> <li>•Bypassing it to through the fields to the west.</li> </ul>	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area. Any further development allocated through the Plan Review will need to ensure that impacts on the transport network can be cost effectively mitigated to an acceptable degree (NPPF #108).
SI6	35	Peter	King	Campaign to Protect Rural England		<p>Link Road: In either case, there should be a link road between Stourbridge and Birmingham Roads, of which a short section already exists as the access to the Barnsley Hall estate. Whether the east end of this should feed in to a roundabout at the junction of Birmingham Road and the bypass or near M42 J1 would need to be a matter for further consultation. M42 J1 is already a complex junction, which should probably not have further entrances added to it, so that termination at a roundabout replacing the Birmingham Road/bypass traffic lights at the southern end of a new Lickey End bypass. While such a road could help employment if a new employment area were created between the link road and M42. That area, next to the motorway, is liable to be noisy and will thus be less suitable for housing.</p> <p>Your council has experienced difficulty in granting planning permission for the two former ADRs west of Bromsgrove, because traffic is a significant problem, so that the developers have been unable to produce a satisfactory traffic assessment. The suggested link road will provide access to Perryfields site and thus to the Whitford site. This is likely to alleviate the traffic problem and thus free up those sites for development.</p>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	36	Conrad	Palmer	Fairfield Village community Association		Sites of business operation will require easy, uncongested, access to the motorway and primary A road; investment in new road infrastructure will be required. Without the road infrastructure, opportunities to attract quality medium to large sizes businesses will be greatly reduced.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review, in particular the accessibility to either existing or potential employment sites in the District. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	39	Andrew	Carter	Homes England		The recent improvements to the railway station at Bromsgrove will have a degree of assistance to support inward commuting. This will support a degree of employment growth within the town centre. The primary challenge for employment growth outside of the town centre is the available capacity on the A38. An intervention to increase capacity on the A38 and its physical operation with Junction 1 of the M42 would be needed to support strategic employment growth.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area. Any further development allocated through the Plan Review will need to ensure that impacts on the transport network can be cost effectively mitigated to an acceptable degree (NPPF #108). A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review.
SI6	42			Wythall Residents Association		The County Council needs to plan for and deliver major road improvements to ease congestion and permit easier travel within the District and cut pollution levels.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	67	Robert	Davies	Gerald Eve	Client	<p>It is considered that land close to strategic motorway junctions in particular lend themselves to the provision of logistics uses and could come forward without significant infrastructure improvements beyond those required in the immediate locality of proposals themselves.</p> <p>Logistics requirements over the life of the Plan are likely to be similar in locational requirements to those that exist today. As such, the best access to the strategic road network and motorway network will remain a prime consideration for those uses.</p>	Noted. The accessibility to the strategic road network will be a key consideration in determining site suitability and land availability for employment development proposals in the Plan Review.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI6	72	Stephen	Peters			<p>The County Council needs to plan for and deliver major road improvements to ease congestion and permit easier travel within the District and cut pollution levels.</p> <p>Access by HGVs into and within the Stoke Prior commercial zone is hindered by the existence of low railway bridges. There is an urgent need for an improved road link to the M5 motorway. The area then has the potential for further employment growth.</p>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review, in particular the accessibility to either existing or potential employment sites in the District. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	92	Andrew	Watt	Maze Planning Solutions	Client	Allocating new employment land in accessible locations attractive to business and providing scope for housing and uses that will support the primary employment function should enable the District to provide adequate support for employment growth.	Noted. The accessibility to the strategic road network will be a key consideration in determining site suitability and land availability for employment development proposals in the Plan Review.
SI6	98	Sally	Oldaker			Yes – if you provide new schools, surgeries, other facilities/amenities which are needed anyway due to more houses, there will be some new jobs created. Also the Junction 2 (M42) area would be OK for development, to make a business park or whatever. And within Bromsgrove, we need better public transport so people can travel by bus if they are working within the immediate area.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. A multi-modal approach to transport provision and consideration of the network will be crucial to provide evidence to support sustainable growth.
SI6	99	Mark	Dauncy	Pegasus	Gallagher Estates	Important to ensure that strategic infrastructure improvements are commensurate with planned growth, including improvements to the rail network and M42 corridor	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	100	Ryan	Bishop			Looking at Wythall and the surrounding area – we know we will have additional houses in the area – due to the border location the majority of transport is away from the district (with the train and busses to Solihull). A greater form of transport to Redditch/Bromsgrove would be preferable.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. A multi-modal approach to transport provision and consideration of the network will be crucial to provide evidence to support sustainable growth.
SI6	103	Chris	May	Pegasus	Persimmon Homes	Larger scale sites which can be identified for development, or safeguarded as such, will offer the opportunity to deliver or contribute to wider infrastructure requirements.	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Through potential to develop and enhance off-road cycle routes, the development of the Golf Centre could contribute towards providing a network of cycle routes within Bromsgrove to access employment opportunities from residential areas by non-car modes.	Noted. Access to housing, employment and other land uses by sustainable modes of transport will be an important consideration in determining the scale and location of development proposals in the Plan Review.
SI6	124	Robert	Lofthouse	Savills	Taylor Wimpey	The Issue and Options queries whether there are infrastructure improvements that will help to encourage employment growth within the District (Q.SI6). The delivery of the necessary highways infrastructure to accommodate existing planned growth requires the Council to take a proactive role, in close cooperation with the Highways Authority, in order to facilitate and realise development. This needs to be addressed in the context of the Infrastructure Delivery Plan (IDP) and Local Transport Plan (currently LTP4), which will need to be revisited as part of the plan review.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	140	Sarah	Butterfield	White Young Green	Client	The Issues and Options consultation document identifies that the M42 corridor is an economic advantage which could be better used to attract industrial uses into the District. Development along this corridor should be provided with the appropriate infrastructure to ensure it is able to be serviced, and is attractive to businesses, and workers travelling to the area.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review, in particular the accessibility to either existing or potential employment sites in the District. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	161	Ian	Macpherson		Self	High Speed Broadband?	Noted. The District Council will work with the County Council on the issue of broadband provision, building on the work currently undertaken as part of the 'Superfast Worcestershire' project. See also comments made and responses to Q.E8 from the Issues and Options consultation document.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI6	165	Johanna	Wood			More effective road network that reduces the significant rush hour congestion at key pinch points. Developments very close to the motorway networks e.g. at M42 Junction 1 - expansion of the Topaz Business park and M42 J2 and 3	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review, in particular the accessibility to either existing or potential employment sites in the District. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	166	John	Gerner			Conflict between north-south and east-west traffic significantly contributes to congestion in the urban area. A western distributor road has been a long term objective with, for example a link between Birmingham Road and Kidderminster Road (identified in the 2004 BDLP). A western distributor road will also require a route south of Kidderminster Road to link with the A38 at Puddle Wharf.  Consideration should be given to the Kidderminster Road to Birmingham Road link being designated as the A448 primary east-west route through the town to alleviate town centre congestion.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	171	Mark	Cooper			QSI 6: Given my last comment above, then the focus for Bromsgrove needs to be improved infrastructure in terms of road and rail links into the surrounding areas, primarily Birmingham. There are many roads that are currently heavily congested on Sunday afternoons let alone rush hour, so significant investment is required in road widening schemes (e.g. for the A38) as well as targeted work at key points on the A441 and the A491. If proposed housing growth goes ahead then this becomes even more imperative, alongside improved utility services. It could be considered to use bus/rail links from certain areas of population out to and back from Barnt Green, Hagley and Bromsgrove rail stations.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. A multi-modal approach to transport provision and consideration of the network will be crucial to provide evidence to support sustainable growth. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SI6	192			Dodford with Grafton Parish Council		See above: improved roads, bus services shops, restaurants, other social facilities (gyms, cinema, bars, library, etc), would all help to make the district more attractive and appealing to incomers (with the appropriate types of housing).	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
<b>Q.SI7: Do you think we have interpreted the standard methodology correctly?</b>							
SI7	1	Tammy	Williams	Alvechurch Parish Council		Depends on whether the housing projections are correct for this District, and how the Government has come to that conclusion, but this may be outside BDC's control	The Office of National Statistics produces the projections for the UK. We have no alternative statistical data on which to base the Standard Methodology calculations
SI7	4	Barry	Spence	Bentley Pouncefoot Parish Council		The Parish Council does not feel able to answer this question.	Noted
SI7	9	Alexandra	Burke	Hagley Parish Council		Note the similarity of the figures with the Housing White Paper. Bromsgrove DC should seek co-operation from Redditch BC in them revising their plan to reduce their housing target to the figure implied by the standard methodology for Redditch. This would mean that land in Bromsgrove District adjoining Redditch could become available for Bromsgrove's needs. Re-assessment of Redditch's needs ought to be part of the evidence base. The overestimate of Redditch Housing Needs has severely hindered BDC's planning process, the overestimated identification of land should be available to BDC to take its housing needs. This will create a new settlement and the opportunity should not be wasted. There is accordingly a good case for halting the review.	The issue of land in Bromsgrove District, adjacent to Redditch is considered under Strategic Issue 4: Broad options for development distribution and allocating land uses. The methodology used to determine the OAHN for both Bromsgrove and Redditch, which informed the Plans adopted in January 2017 was found to be sound and appropriate. At that time the Standard Methodology did not exist. This Plan Review will need to consider whether the land allocated to meet Redditch's needs can continue to do so going forward or whether it realistically meets the housing needs of Bromsgrove District as a whole.
SI7	20	P	Harrison	Wythall Parish Council		We would expect well-trained and well-paid Officers to interpret the standard methodology correctly and to calculate the correct objective local housing need. However, a new Government consultation document suggests that the methodology needs to be revised to reflect the aspiration to build more new homes and to reflect the actual numbers achieved during the preceding year. It would be wise to await the results of the consultation and any subsequent revision to the methodology.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI7	21	Martin	Dando	Birmingham City Council		The Government are currently carrying out further consultation on the Standard Methodology for calculating housing need so the figures highlighted within the Issues and Options document may have to be adjusted accordingly.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI7	22	Carl	Mellor	Black Country Authorities		The Government have yet to confirm their preferred housing projection methodology in order to take into account the latest (2016) housing projections so the figures may have to be adjusted slightly from those in the Issues and Options document.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI7	27			Stratford On Avon District Council		SDC understands that the Standard Methodology is being finalised/revised, therefore the draft figures should be treated with caution. The standard methodology represents the minimum level of additional housing and will need to account for job growth and economic aspirations of the district. The purpose of the Standard methodology is to remove the debate over demographic components of local housing need, but does not account for other factors.	It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	34	Sue	Baxter			I am not qualified to answer this question and will wait to see the outcome	Noted.
SI7	35	Peter	King	Campaign to Protect Rural England		Yes, the figures tally with our calculations on the basis of the 2014 household projections but are incorrect when compared to the 2016 figures. While these are higher for Bromsgrove they have not been accepted by Government for the purposes of assessing need. Both figures also have to be offset against the reduction in projected household growth in Redditch which releases the land currently allocated in Bromsgrove to meet Redditch's need.  Please see full response by Gerald Kells for CPRE - it includes graphs, tables and calculations for the standard methodology for BDC, RBC and some calculations for Birmingham.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI7	38	Sue	Green	Home Builders Federation		As set out in the 2018 NPPF the determination of the minimum number of homes needed should be informed by a local housing need assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach. Using the standard methodology the Council has calculated a local housing need figure of about 6,500 dwellings for the period 2018 – 2036. This calculation is mathematically correct using the 2014-based household projections and 2017-based affordability data if however the 2016-based household projections are used the resultant local housing need figure is higher. Whatever the final local housing need figure used the Council is reminded that this is only the minimum starting point any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are additional to the local housing need figure. The Government's objective of significantly boosting the supply of homes remains (2018 NPPF para 59). It is important that housing need is not under-estimated. The Council is committed to meeting 3,400 dwellings of unmet housing needs from Redditch by 2030. This existing commitment is in addition to the local housing need for Bromsgrove calculated using the standard methodology. This existing commitment should continue to be met by Bromsgrove District Council.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.  The issue of land in Bromsgrove District, adjacent to Redditch is considered under Strategic Issue 4: Broad options for development distribution and allocating land uses. The methodology used to determine the OAHN for both Bromsgrove and Redditch, which informed the Plans adopted in January 2017 was found to be sound and appropriate. At that time the Standard Methodology did not exist. This Plan Review will need to consider whether the land allocated to meet Redditch's needs can continue to do so going forward or whether it realistically meets the housing needs of Bromsgrove District as a whole.
SI7	42			Wythall Residents Association		We would expect well-trained and well-paid Officers to interpret the standard methodology correctly and to calculate the correct objective local housing need. However, a new Government consultation document suggests that the methodology needs to be revised to reflect the aspiration to build more new homes and to reflect the actual numbers achieved during the preceding year. It would be wise to await the results of the consultation and any subsequent revision to the methodology.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI7	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Use of Standard Method is supported. Appendix 2 suggests that the Standard Methods minimum need for Bromsgrove (373) dpa will need to be increased significantly to between 439 and 615 dpa to account for economic growth aspirations. The Standard Method should only be seen as a minimum housing requirement.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI7	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	<p>The Council should keep their housing need figure under review take account of the Governments standard methodology as the Plan Review moves forward.</p> <p>Local housing need assessment only represents the minimum number of dwellings that should be planned for and to support a prosperous region, economic growth, and to create much needed housing, the Council should aim to exceed this number. This will help boost affordable housing numbers as well as allow for the Council to plan for unmet need from elsewhere in the region. This specifically includes Redditch, for which Policy RCBD1 (Redditch Cross Boundary Development) commits the Council to providing 3,400 dwellings to meet the unmet need of Redditch by 2030. This requirement is above Bromsgrove's need and should be carried forward in the Plan Review.</p> <p>Paragraph 4.20 of the Issues and Options document sets out that land for about 2,500 dwellings is already allocated in the current plan and will count towards the Council's revised housing need. It is considered that as this land is already allocated to meet housing need during the current plan period, much of this should not be carried forward into the Plan Review.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	47	Michael	Jones	Caddick Land		<p>The use of the standard methodology as set out in the NPPF is the correct procedure but until the Government has confirmed the methodology to use then it is not possible to conclude that the interpretation set out in the Issues and Options Document is correct. Once the Government's methodology has been confirmed then that needs to form the basis for calculating the base housing requirement. To this the Council should allow for employment growth within the District.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	YES	Noted.
SI7	50	Debbie	Farringdon	Cerda Planning	The Trustees	Yes	Noted.
SI7	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>It is conceded that the standardised methodology in calculating housing need, as produced by Central Government, looks to establish a uniform approach in ensuring that appropriate levels of housing development is realised to "catch up," with the lack of development that has characterised the housing market historically. Whilst it is positive that the emerging Bromsgrove Local Plan has established appropriate consideration to the standardised methodology, it is Claremont Planning's view that the Plan has inappropriately approached the calculation and resulting housing numbers.</p> <p>The Plan acknowledges that delivering fewer numbers as identified is not an option but provides only absolute minimums in numbers for housing delivery in the District. Whilst national guidance dictates that minimums should be a baseline to prepare a Plan from, given the historical under performance and delivery of the District, which has resulted in the early review of the Plan, the new Plan should ensure that it is aspirational rather than merely providing the absolute minimum. In that sense, the Plan has not fully or appropriately interpreted the standardisation of the methodology, which looks to maximise housing delivery, rather the Plan has incorrectly inferred that a minimum delivery is suitable.</p> <p>Careful consideration should also be attributed to how the methodology is incorporated into the new Plan as to ensure that the specific characteristics of Bromsgrove District are included into how the identified numbers are produced. This includes the significant development pressures arising from authority areas beyond the District, primarily from Greater Birmingham and Redditch which must be taken into appropriate account. How this Duty to Cooperate will impact on the standardised methodology in the context of Bromsgrove should be made clear to ensure that the methodology has not been ineffectively implemented. If this results in that the identified numbers have not taken this into practical account, the Plan as such will not have shown its positive preparation cannot be seen to be demonstrating an effective approach in ensuring that the required need can be delivered over the Plan's period.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI7	52	Tom	Ryan	Claremont Planning	Bellway Homes	<p>Whilst it is positive that the emerging Bromsgrove Local Plan has established appropriate consideration to the standardised methodology, it is Claremont Planning's view that the Plan has inappropriately approached the calculation and resulting housing numbers.</p> <p>The Plan acknowledges that delivering fewer numbers as identified is not an option but provides only absolute minimums in numbers for housing delivery in the District. Whilst national guidance dictates that minimums should be a baseline from which a Plan should be prepared from, given the historical under performance and delivery of the District, which has resulted in the early review of the Plan, the new Plan should ensure that it is aspirational rather than merely providing the absolute minimum. In that sense, the Plan has not fully or appropriately interpreted the standardisation of the methodology, which looks to maximise housing delivery, rather the Plan has incorrectly inferred that a minimum delivery is suitable.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	<p>Whilst it is positive that the emerging Bromsgrove Local Plan has established appropriate consideration to the standardised methodology, it is considered that the Plan has inappropriately approached the calculation and resulting housing numbers.</p> <p>The Plan acknowledges that delivering fewer numbers as identified is not an option but provides only absolute minimums in numbers for housing delivery in the District. Whilst national guidance dictates that minimums should be a baseline from which a Plan should be prepared from, given the historical under performance and delivery of the District, which has resulted in the early review of the Plan, the new Plan should ensure that it is aspirational rather than merely providing the absolute minimum. In that sense, the Plan has not fully or appropriately interpreted the standardisation of the methodology, which looks to maximise housing delivery, rather the Plan has incorrectly inferred that a minimum delivery is suitable.</p> <p>Careful consideration should also be attributed to how the methodology is incorporated into the new Plan as to ensure that the specific characteristics of Bromsgrove District are included into how the identified numbers are produced. This includes the significant development pressures arising from authority areas beyond the District, primarily from Greater Birmingham and Redditch which must be taken into appropriate account. How this Duty to Cooperate will impact on the standardised methodology in the context of Bromsgrove should be made clear to ensure that the methodology has not been ineffectively implemented.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	54	Katherine	Else	Claremont Planning	Miller Homes	<p>In that sense, the Plan has not fully or appropriately interpreted the standardisation of the methodology, which looks to maximise housing delivery, rather the Plan has incorrectly inferred that a minimum delivery is suitable. Careful consideration should also be attributed to how the methodology is incorporated into the new Plan as to ensure that the specific characteristics of Bromsgrove District are included into how the identified numbers are produced.</p> <p>How this Duty to Cooperate will impact on the standardised methodology in the context of Bromsgrove should be made clear to ensure that the methodology has not been ineffectively implemented.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	<p>OAN calculations are a useful starting point for a common approach to planning for housing growth and should simplify the calculation of the need for homes through the local plan process.</p> <p>However, this doesn't absolve planning authorities from needing to engage with their neighbours to review and address cross-border issues which relate to meeting housing needs of the wider area. Therefore, at this point in the emerging local plan process, any "OAN" housing calculation should be viewed as a minimum figure pending discussions with neighbouring authorities</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	57	Karin	Hartley	Delta Planning	Bloor Homes Western	<p>The consultation document is not accompanied by any further information on how the housing need has been calculated and it is therefore not possible to interrogate the data underlying the District Council's calculation. Using the 2014-based household projections and the 2017 median workplace-based affordability ratio data, we calculate the annual housing requirement to be 373 dwellings, slightly above the annual dwelling requirement used by the District Council. As the standard methodology should be used to determine the minimum number of homes needed over the plan period, the housing targets set out at Para 4.20 need to be increased to reflect this slightly higher annual dwelling requirement. For a plan period up to 2036 the housing target would be 6,720 dwellings. To meet housing needs to 2041, the housing target would increase to 8,580 dwellings and to 2046 to 10,450 new homes.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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SI7	58	Karin	Hartley	Delta Planning	Bloor Homes Western & Maximus	Unfortunately, the consultation document is not accompanied by any further information on how the housing need has been calculated and it is therefore not possible to interrogate the data underlying the District Council's calculation. Using the 2014-based household projections and the 2017 median workplace-based affordability ratio data, we calculate the annual housing requirement to be 373 dwellings, slightly above the annual dwelling requirement used by the District Council. As the standard methodology should be used to determine the minimum number of homes needed over the plan period, the housing targets set out at Para 4.20 need to be increased to reflect this slightly higher annual dwelling requirement. For a plan period up to 2036 the housing target would be 6,720 dwellings. To meet housing needs to 2041, the housing target would increase to 8,580 dwellings and to 2046 to 10,450 new homes.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	63	Fiona	Lee-McQueen	Framptons	Bellway Homes	The interpretation of the standard methodology cannot be confirmed until the Government publishes updated guidance on the matter.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	65	Louise	Steele	Framptons	Summix Ltd	The interpretation of the standard methodology cannot be confirmed until the Government publishes updated guidance on the matter. The Guidance proposes to change the methodology to ensure consistency with the objective of building map names [more homes??].	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	68	Nicole	Penfold	Gladmans		Support the Council in using the standard method, believe this to be mathematically correct based on the 2014 household projections. This should be the very minimum that is planned for and is only the starting point. The Council can plan to deliver a greater scale of affordable housing and support economic growth and to meet unmet need from neighbouring authorities.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	69	Latisha	Dhir	GVA	St Phillips	The Council should review their current approach to the implementation of the standardised methodology for calculating OAHN in line with the most up to date evidence and subsequently the proposed housing requirements within the emerging Local Plan Review. In line with the proposed Plan period, 2018-2041, this would result in a minimum housing need of 9,591 dwellings, equating to 417 dwellings per annum.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	72	Stephen	Peters			I would expect well-trained and well-paid Officers to interpret the standard methodology correctly and to calculate the correct objective local housing need. However, a new Government consultation document suggests that the methodology needs to be revised to reflect the aspiration to build more new homes and to reflect the actual numbers achieved during the preceding year. It would be wise to await the results of the consultation and any subsequent revision to the methodology.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI7	75	Rachel	Mythen	GVA	Taylor Wimpey	<p>The Council should review their current approach to the implementation of the standard method in line with the most up-to-date evidence and subsequently the proposed housing requirements within the emerging Local Plan Review. In line with our preferred Plan period (Option 2 - 2018-2041), this would result in a minimum housing need of 9,591 dwellings, equating to 417 dwellings per annum.</p> <p>The Council will need to take into consideration strategic cross-boundary issues within the Greater Birmingham Housing Market Area. If the Council continue with the current approach, it is likely that the emerging plan will fail to satisfy the tests set out in the NPPF under the Duty to Cooperate. In addition, the level of housing growth required will not be met, which will have significant adverse impact across the wider Housing Market Area.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.



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SI7	76	Emily	Vyse	GVA	University of Birmingham	The numbers listed by the Council in paragraph 4.20 make no allowance for unmet needs arising elsewhere and so none of the figures listed are NPPF compliant / sound. GVA will comment further and more fully on the matter of housing numbers when the Government's position on the standard method (short term fix) is confirmed post consultation and when the Council has included within its calculation a fully evidenced amount to meet unmet needs arising elsewhere. We will be interested to see, when revised numbers are released by the Council, whether it promotes a housing requirement that deals appropriately with the Districts own needs and unmet needs arising elsewhere and whether, in addition, it provides for further growth noting the economic ambitions of the Region and the fact that the NPPG makes it clear that the standard method uses a formula to identify the minimum number of new homes needed.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	78	Sean	Rooney	Harris Lamb	Barratt Homes	We do not think the council have interpreted the standard methodology correctly. Our calculation indicates that the annual housing need is 412.8 dwellings per annum.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	80	John	Pearce	Harris Lamb	Bloor Homes	No. We have calculated what the council's housing need would be using the three steps set out in the Planning Practice Guidance (PPG) on Housing Need Assessment (ID: 2a-004-20180913)  Please see representation for calculations	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Our calculation indicates that the annual housing need (when calculated using 2016 based population projections) is 412.8 dwellings per annum. This is well in excess of 361 dpa Council has set out in para.4.20 of the Issues and Options. Therefore perplexing when the Council sets out at 4.21 that the government's standard methodology makes it clear that providing fewer homes is not an option. The above excludes any allowance to meet the growth requirements of Birmingham.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	No, the methodology has not been interpreted correctly. The 2016 Household projections were published on 20 September and should be used to establish the base line position. (recalculation detailed in Rep)	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	No. Have submitted a revised figure based on the three steps set out in the PPG. Calculation indicates that the annual housing need is 412.8 dwellings/annum. This would equate to: 1) 2018-36: 7,430 dwellings 2) 2018-2041: 9,494 dwellings 3)2018-2046: 11,558 dwellings	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI7	86	Rebecca	Anderson	Iceni Projects	Generator Developments	The Council will need to plan for a higher figure than the 2014-based ONS Standardised Objectively Assessed Need (SOAN) figure to accommodate economic growth and due to stronger household formation rates.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	86	Rebecca	Anderson	Iceni Projects	Generator Developments	We consider that the SOAN figure is accurate, but we consider that there is more logic to use the higher 2016-based ONS figure. The Government has directed local authorities to use the 2014-based figures as a benchmark position, but only because these usually deliver much higher housing targets for local authorities. This is not the case in Bromsgrove where the 2016 figure is higher than 2014, and the use of the 2014-based figure would actually constrain housing growth, contrary to the thrust of Government policy.  In addition, as stated previously, any new SOAN methodology is likely to lead to much higher levels of housing growth in Bromsgrove, given the strong ONS household formation data which it will be based upon. Using the higher 2016-based figure as a starting point will allow the District to plan to deliver sufficient housing as the plan emerges, rather than having to find additional sites and delay the plan production at a later date when a new higher figure is derived from a new methodology.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	87			Indenture		Understanding that this paragraph is not now aligned with current Government Guidance. The 2014 housing projections should be used, alongside a revised approach for calculating standard method.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	The standard method is based on the latest household projections prepared by ONS, with an upward adjustment made in the case of all authorities where the affordability ratio is greater than 4. The 2016-based household projections were published on 20 September 2018 – after the Issues and Options Consultation document was drafted. As a result, the figures set out in paragraph do not reflect the most up-to-date standard method calculations.  Bromsgrove District is one of the few local authorities that has bucked the national trend. The housing need associated with the 2016-based household projections is higher than that derived from the 2014-based projections. Applying the methodology currently set out in the NPPF and PPG generates a standard method figure of 412dpa for Bromsgrove District. Based on our recommended Plan period of 2018-2041 (23 years), this results in a total housing need of 9,476 dwellings for Bromsgrove District alone.  If this proposed change is brought into effect the adjusted housing need figure for Bromsgrove will be 373dpa between 2018 and 2028. Although lower than the figure identified by the standard methodology using the 2016-based SNHP, it remains slightly above the FOAN for Bromsgrove that informed the current Local Plan requirement. The 2016-based household projections resulted in a reduction in the standard method figures for Birmingham and Redditch (to 3,247dpa and 142dpa respectively). However, the proposed changes to the standard methodology would generate a much higher level of housing need (3,577 and 186dpa respectively). Furthermore, the standard methodology does not consider future changes to economic circumstances, and the PPG recognises that “there will be circumstances where the actual housing need may be higher than the figure identified in the standard methodology” and that “the government is committed to ensuring more homes are built and are supportive of authorities who want to plan for growth”. Taking account of considerations such as growth strategies and planned strategic infrastructure improvements, these authorities may decide to plan for a level of housing that is greater than the standard method figure.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI7	89	Reuben	Bellamy	Lone Star Land	Cleint	Paragraph 60 of the NPPF sets out that the standard methodology only determines the minimum number of homes needed. The formula does not take account of any economic development strategy in a plan, nor does it account for meeting unmet needs from neighbouring authorities. While the formula has been applied correctly, the Government intends to consult on changes to the methodology in December.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	90	Owen	Jones	LRM Planning	Persimmon Homes	The NPPF's presumption in favour of sustainable development requires that the Local Plan's strategic policy provides in the first instance, as a minimum, the Objectively Assessed Need (OAN) for housing and other uses. In this regard, the Council will need to consider the implications the OAN has in forming a judgement about whether a higher housing requirement would be more appropriate. This will need to consider such matters as the structure of the local population now and in the future, the economic strategy and growth objectives, changes in labour supply versus labour demand and the level of affordable housing that should be provided, unmet need for adjoining local authority areas, previous rates of housing delivery. It is important to recognise that the levels of housing identified by the standard method represents that calculated only for the District. It does not include unmet need from other parts of the Birmingham and the Black Country Housing Market Area.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	91	Max	Plotnek	Maddox Planning	David Goldstein	Agree that Bromsgrove has interpreted the standard methodology correctly.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	94			Nigel Gough Associates	Aniston Ltd	Not consistent with Government Guidance as should be based on the 2014 housing projections alongside a revised approach for calculating the standard methodology.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	95			Nigel Gough Associates	Monksgraston Ltd	It is our understanding that this paragraph is not now aligned with current Government guidance as it would appear to be based on updated figures. On 20 September 2018 the 2016 Household Projections were published which amended the baseline to which the  Standard Method for assessing housing need should be considered. Since that date, the Government has recommended that the 2014 Housing Projections should be used, alongside a revised approach for calculated Standard Method. We further understand that the Government is consulting upon this revised approach and that further revisions could be forthcoming.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	96			Nigel Gough Associates	Mr Stapleton	It is our understanding that this paragraph is not now aligned with current government guidance as it would appear to be based on updated figures. The 2016 Household projections were published in September 2018, which amended the baseline to which the Standard Method for assessing housing need should be considered. Since then, the government has recommended that the 2014 projections should be used alongside a revised approach for calculated standard method. We further understand that the Government is consulting upon this revised approach and that further revisions could be forthcoming.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI7	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	Since the release of the 2016 household projections, we understand that the Government is consulting upon the revised approach to the standard methodology and that further revisions could be forthcoming.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	100	Ryan	Bishop			I am not best placed to judge that.	Noted.
SI7	105	David	Onions	Pegasus	Persimmon Homes & Gallagher Estates	There is no suggestion that the proposal is aimed at reducing housing supply and thereby the suggestion outlined in Option 8 that is somehow gives the opportunity to remove what are already clear commitments in Adopted Development Plans, including the Brockhill allocation, is entirely flawed. Persimmon Homes and Gallagher estates remain committed to the delivery of the Brockhill site. To date five areas within the two allocations have been consented which would deliver around 670 new dwellings. The remaining area of two allocations will be subject to a separate planning application to be submitted in early 2019. If the remaining land within the Brockhill Allocation is granted permission then Objective 8 is entirely redundant. Objective 8 should make clear that the Brockhill site is not a site where reconsideration should be pursued as there is clear commitment to gaining a planning permission.	The issue of land in Bromsgrove District, adjacent to Redditch is considered under Strategic Issue 4: Broad options for development distribution and allocating land uses. The methodology used to determine the OAHN for both Bromsgrove and Redditch, which informed the Plans adopted in January 2017 was found to be sound and appropriate. At that time the Standard Methodology did not exist. This Plan Review will need to consider whether the land allocated to meet Redditch's needs can continue to do so going forward or whether it realistically meets the housing needs of Bromsgrove District as a whole.
SI7	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	The figures for housing are not correct. Given government recent pronouncements it is wholly inappropriate to seek to quantify the housing need pending further policy announcements & statistical data due soon.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	114	Charles	Robinson	Rickett Architects	Cawdor	No-figures are too low and continue to understate true need.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	115	John	Breese	Rosconn Strategic Land		Whilst the interpretation of the standard methodology is mathematically correct NPPF paragraph 60 makes clear that the figure produced is the minimum number of homes needed as acknowledged in paragraph 4.20 of the Plans supporting text, excluding any cross boundary growth or housing associated with higher economic growth. The Planning Practice Guidance (PPG) provides clarification of what is appropriate to consider when considering Housing Needs Assessments, with paragraph 10 clarifying the circumstances in which a higher figure than the standard methodology needs to be considered which include where an authority has agreed to take on unmet need.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	A lack of clarity as to what the local housing need figure should actually represent. The next stage in plan making should make it clear that the local housing need figure, is merely a starting point rather than an end point when deriving the appropriate housing requirement over the plan period. It is not clear how cross boundary growth and higher economic growth would manifest within the housing requirement.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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SI7	119	Darren	Oakley	RPS Group	Gleeson	Whilst RPS agree in broad terms with the Council's brief summary of the standard method approach, there would appear to be a lack of clarity, at least in presentation, as to what the local housing need figure should actually represent. To this end, the next stage in plan-making should make clear that the local housing need figure derived through the standard method is merely a 'starting point' rather than an 'end point' when deriving an appropriate housing requirement over the plan period. The I&O document does make reference to cross-boundary growth and housing associated with higher economic growth, but it is not made clear how this would manifest within the housing requirement. The assumption therefore is that the Council could adopt the standard method-based figure as a defacto housing requirement, which clearly would not be a sound approach for Bromsgrove given the circumstances surrounding the plan review.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	120	Michael	Davies	Savills	Cala Homes	Should provide more clarity on how the standard methodology has been approached to calculate housing need.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	122	Michael	Davies	Savills	Landowners	We consider that Bromsgrove Council should provide more clarity on how they have approached the standard methodology to calculate their housing need. The MHCLG consultation document proposed amendments to the standard methodology for calculating housing need. The MHCLG state that planning practitioners should rely on the 2014-based projections for the calculation of housing need rather than the 2016-based projections; unless the 2016-based projections exceed the 2014 figures. As such, Bromsgrove should provide greater clarity on what household projections are being used to calculate their housing need.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	123	Michael	Burrows	Savills	Landowners	BDC should provide more clarity on how they have approached the standard methodology to calculate their housing need.  Whilst we understand that BDC has applied the Government's three stage approach, it should be made clear in the information supporting the Local Plan consultation documents.  BDC should ensure that it fully takes account of the outcome of the MHCLG consultation on changes to planning policy and guidance, including the standard method for assessing local housing need. As such, BDC should provide greater clarity on what household projections are being used, and indeed will be used going forward, to calculate their housing need.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	134	David	Barnes	Star Planning	Richborough Estates	At the time of drafting this representation, a 'Technical consultation on updates to national planning policy and guidance' is the subject of consultation. Until this occurs Richborough Estates is not able to provide any clear view about whether the standard methodology has been interpreted correctly. However, Richborough Estates will be supportive of an approach to determine objectively assessed housing need using the 2014-based household projections with suitable uplifts for affordability and fostering economic growth.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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SI7	136	Kathryn	Young	Turley	Land Fund	<p>It is key to recognise that the primary purpose of the LPR, as established in Policy BD3 'Future Housing and Employment Growth', is to allocate sites to "contribute approximately 2,300 dwellings towards the 7,000 target" to 2030. It is imperative that the purpose of the LPR is not lost and that the outstanding need for approximately 2,300 dwellings is not lost in the application of the standard method. It is however recognised that the LPR will need to accord with the NPPF (2018) which establishes that:</p> <p>"strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." (para. 60)</p> <p>It is critical to recognise that the standard methodology will determine the minimum number of homes needed, which represents a 'starting point'. BDC will therefore need to consider whether economic growth aspirations and housing affordability pressures (as a market signal) necessitate and enhanced housing requirement figure.</p> <p>Turley calculate that BDC's housing need (excluding any need arising from the GBHMA) will increase by 10% from 373 dpa to 412 dpa based on the standard method when applying either the 2014 or 2016-based Household Projection figures. At present the requirement identified at Question SI 8 provides a range of 361 – 364 dpa which clearly falls significantly short of the annual requirement established by the standard method. The Council's current assessment of housing need is significantly higher than the Council currently suggest and our client requests that the Council clarify how the figures proposed in the consultation document have been calculated.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	137	Matthew	Fox	Turley	Redrow Homes	<p>In seeking to identify the housing need and requirement the starting point is that the LPR needs to deliver the 2,300 shortfall to 2030 in accordance with policy BDP4.2 of the BDC Local Plan (2017). However, it is recognised that the LPR will need to accord with the NPPF (para. 60) which requires strategic policies to determine the minimum number of homes needed, informed by a local housing need assessment conducted (unless justified by exceptional circumstances) using the standard method set out in national planning guidance. It also states that, in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.</p> <p>It is critical to recognise that the standard methodology will determine the minimum number of homes needed. As stated in planning practice guidance (July 2018) the standard method for assessing local housing need provides the "minimum starting point in determining the number of homes needed in an area". It adds that "...there will be circumstances where actual housing need may be higher than the figure identified by standard method". BDC will therefore need to consider whether economic growth aspirations necessitate an enhanced housing requirement.</p> <p>Turley has calculated the standard method for Bromsgrove as being 373 dwellings per annum under the 2014-based Household Projections. Whilst the Government have stated that the 2016-based Household Projections should be disregarded at this time it is noteworthy that Bromsgrove's figure increases by 10% to 412 dwellings per annum. These figures have been calculated using the 2017 affordability ratios which were released in March 2018.</p> <p>Both of the above figures are higher than the housing requirement in the BDP (368dpa). Moreover, when they are applied for the proposed plan periods they do not match the figures set out in the Issues and Options document, which leads us to question the assumptions adopted by BDC in the standard method. This is explained in more detail in response to Q.SI 8.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	138	Charles	Robinson	Twelvetwentyone	Landowners	No - figures are too low and continue to understate true need.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI7	139	Glenda	Parkes	Tyler Parkes	Oakland Developments	It is impossible to meaningfully respond to Question SI 7 without detailed information on the data used by the Council to arrive at the housing need options for the three periods. Notwithstanding this, whatever the final local housing need figure turns out to be, this is only the minimum starting point and any ambitions to support economic growth (to address out commuting), to deliver affordable housing (given the affordability ratio in Bromsgrove) and to meet unmet housing needs from elsewhere (given pressures from Redditch and Birmingham) are additional to the local housing need figure.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	161	Ian	Macpherson		Self	Yes	Noted.
SI7	190	Philip	Ingram			The NPPF states the minimum number of homes needed should be informed by a local housing need assessment using the standard methodology unless exceptional circumstances justify an alternative approach. The calculation should be the minimum starting point and additional provisions to support economic growth, deliver affordable housing and to meet unmet needs from Birmingham are additional to this figure.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI7	194	Darren	Oakley	RPS	Clients	<p>Whilst RPS agree in broad terms with the Council's brief summary of the standard method approach, there would appear to be a lack of clarity, at least in presentation, as to what the local housing need figure should actually represent. To this end, the next stage in plan-making should make clear that the local housing need figure derived through the standard method is merely a 'starting point' rather than an 'end point' when deriving an appropriate housing requirement over the plan period.</p> <p>The BI&amp;O document does make reference to cross-boundary growth and housing associated with higher economic growth, but it is not made clear how this would manifest within the housing requirement. The assumption therefore is that the Council could adopt the standard method-based figure as a defacto housing requirement, which clearly would not be a sound approach for Bromsgrove given the circumstances surrounding the plan review. Additionally, the Council will be aware of the current uncertainties surrounding the methodology for applying the standard method based figure and in particular the current national consultation on a revised methodology, which is anticipated for many authorities, including Bromsgrove to lead to an increase in its requirement. It is RPS view that the new approach should be established, which will also need to address cross boundary requirements associated with the GBHMA shortfall, prior to the Bromsgrove Local Plan establishing its spatial strategy</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. It is agreed that the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
<b>Q.SI8: Which of the following options do you consider is most appropriate and why? [For options 1 and 2]</b>							
SI8	1	Tammy	Williams	Alvechurch Parish Council		Option 2: Allocate land for about 8,350 dwellings up to 2041 appears the pragmatic approach considering NPPF policy, and to protect 5 year supplies of land	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	2	Gill	Lungley	Barnt Green Parish Council		Option 2 - 8350 dwellings up to 2041.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	4	Barry	Spence	Bentley Pauncefoot Parish Council		We would support option 1	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	5	Kevin	Joynes	Beoley Parish Council		Land should be allocated for about 6,500 dwellings up to 2036. Needs and priorities change over time, risks not capturing new priorities which emerge during the life of the plan.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	9	Alexandra	Burke	Hagley Parish Council		<p>Closely linked to the question as to the Plan Period. Council needs to be wary of relying on aspirational Strategic Economic Plans. Have excessively and unrealistically high growth targets so that the total of all plans is wholly unachievable. Overreliance on flawed SEPs will lead to mismanagement in planning the development of the District. In Hagley there appears to have been no demand for the employment land identified in the 2016 plan, an application has recently been made for it to be developed as a care home. New technology and online shopping is a growth industry and 30% of the land that might be allocated for employment can be applied to high tech housing needs. Para 11b of the NPPF allows a LPA which is subject to constraints to plan for less than its Objectively Assessed Need. The Green Belt constraint and its objective of encouraging the re-use of urban land strongly point to the Council not making excessive allocations. Consideration will need to be given to what new infrastructure is needed to go with released land, for example via a CIL.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p> <p>Infrastructure and its delivery forms an integral part of the plan making process.</p>
SI8	10	Patricia	Dray	Highways England		<p>Combined Answer to Questions 8 and 9</p> <p>As it will be necessary for Bromsgrove to work with the Birmingham and Black Country areas to consider the Housing Market Area (HMA) growth, the length of time period selected and lands identified, should be considered in this wider context. Clearly should the higher levels of growth be selected the plan period is likely to lengthened to accommodate the achievable build-out rates.</p> <p>More importantly as discussed in our responses to the transport related questions, below, all housing development options are likely to require infrastructure investment, in some cases at substantial levels, to accommodate the proposed growth. In this context a critical mass of housing development would be required to provide sufficient funding for both infrastructure and other transport interventions.</p> <p>The question of whether the standard approach to local housing need is taken or otherwise is a matter for the Council. Highways England's role in the plan making process is to aim to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the strategic road network rather than to address the detail of the housing need calculation.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p> <p>Infrastructure and its delivery forms an integral part of the plan making process.</p>
SI8	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council prefer option 1	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	16	Rebecca	McLean	Severn Trent		Option 3 – Allocate land for about 10,200 dwellings up to 2046. A longer planning horizon will help Severn Trent to plan for the overall catchment strategy with the knowledge of all expected housing. By understanding where growth will occur upfront, we can avoid implementing a strategy that is shortly ineffective due to additional growth not already identified	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p> <p>Infrastructure and its delivery forms an integral part of the plan making process.</p>
SI8	20	P	Harrison	Wythall Parish Council		Option 3 is the most appropriate because it provides a degree of certainty for the foreseeable future.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	21	Martin	Dando	Birmingham City Council		As stated in the answer to SI 4, the longer the plan period covered by the Plan Review, the greater the amount of land which will need to be allocated. However, whichever time period chosen, the Plan review should test to see if additional capacity over and above that identified in the Standard Methodology could be accommodated (option 4). This would fulfil Bromsgrove's Duty to Co-operate obligations to test the findings of the GBBC HMA Strategic Growth Study and investigate if any of the potential housing shortfall across the conurbation can be accommodated within the Plan Review.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	22	Carl	Mellor	Black Country Authorities		Option 4 (allocate land for more homes than recommended by the Standard methodology) may be the most appropriate and robust level of housing needing to be planned within the Bromsgrove Plan review. This is because of the potential shortfalls in housing land currently being identified in the Black Country and wider West Midlands conurbation and the need to investigate all possibilities in helping to accommodate some of that shortfall.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	25	Gary	Palmer	Solihull Metropolitan Borough		Option 4 (Irrespective of the length of the Plan period, allocate more homes than recommended by the standard methodology) is favoured as this acknowledges that more land than that required for the standard methodology is needed to help with the HMA shortfall. Whilst the length of the plan period is a matter for Bromsgrove (and the benefits of establishing long term boundaries for the Green Belt are acknowledged), this Council is keen to understand how the wider HMA needs beyond 2036 are to be taken into account if the plan period is taken to 2046.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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SI8	28	Emily	Barker	Worcestershire County Council		Support allocations to 2046. Within this context accept that there will be less certainty over allocations later in the plan period, setting the directions for development would be of benefit to infrastructure providers. Needs to be planned to facilitate infrastructure requirements and timed to facilitate delivery.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p> <p>Infrastructure and its delivery forms an integral part of the plan making process.</p>
SI8	34	Sue	Baxter			I would favour option 3 as it gives a more certainty for our residents	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	35	Peter	King	Campaign to Protect Rural England		<p>We would favour option 1, on the proviso that it includes land currently allocated for Redditch's need which is no longer required. Uncertainty in future projections, particularly in relation to household size, immigration and mortality would mitigate against allocating housing for uncertain need beyond 2036.</p> <p>There is no clear reason for increasing allocations above the Standard Methodology since it provides the highest uplift in housing above demographic need in the Greater Birmingham HMA and, in practice, over-allocation would simply fuel commuting to the conurbation</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The issue of land in Bromsgrove District, adjacent to Redditch is considered under Strategic Issue 4: Broad options for development distribution and allocating land uses. The methodology used to determine the OAHN for both Bromsgrove and Redditch, which informed the Plans adopted in January 2017 was found to be sound and appropriate. At that time the Standard Methodology did not exist. This Plan Review will need to consider whether the land allocated to meet Redditch's needs can continue to do so going forward or whether it realistically meets the housing needs of Bromsgrove District as a whole.</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	36	Conrad	Palmer	Fairfield Village community Association		Option 4 for a plan up to 2041	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	38	Sue	Green	Home Builders Federation		<p>Option 4 is considered the most appropriate because the Council should meet both its own local housing need and a proportion of unmet needs from neighbouring authorities including Redditch and Birmingham. The local housing need calculated using the standard methodology is a minimum figure. A flexibility contingency should be applied to the Council's overall housing land supply (HLS) in order that the LPR is responsive to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice as well as competition in the land market.</p> <p>The HBF acknowledge that there can be no numerical formula to determine the appropriate quantum for a flexibility contingency but if the LPR is highly dependent upon one or relatively few large strategic sites, settlements or localities then greater numerical flexibility is necessary than if the HLS is more diversified.</p> <p>For the Council to maximize housing delivery the widest possible range of sites by size and market location are required so that small local, medium regional and large national house building companies have access to suitable land in order to offer the widest possible range of products. The HBF always suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	39	Andrew	Carter	Homes England		<p>The standard methodology of approximately 360 dpa is a reasonable but potentially conservative starting point at which to commence a Local Plan review. However, it is felt that the housing growth targets should be increased to take account of the following factors:</p> <p>In relation to BROM2 and BROM3, the length of time from submission of an application for a strategic housing site to the point of determination demonstrates the need to have a degree of flexibility and contingency in a housing growth target, particularly where infrastructure capacities are key to delivery.</p> <p>The NPPF (2014) sets out a buffer figure of 20% for housing delivery where there is a persistent under delivery of housing in a Local Authority area. Whilst it is not suggesting that Bromsgrove District Council persistently under delivers on housing it is considered that 20% is a reasonable and definable contingency figure for a Local Plan to adopt to demonstrate flexibility and choice in the local housing market including any slowing in the anticipated delivery rate. This contingency would enable the Council to take account of the external pressures and identify additional sites and safeguarded sites where the contingency could be accommodated.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	42			Wythall Residents Association		Option 3 is the most appropriate because it provides a degree of certainty for the foreseeable future.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	<p>Option 3 is supported as it delivers a Plan Period up to 2046. In accordance with Option 4 , it is considered that the Council should be allocating land for more homes than recommended by the Standard Methodology of between 439 and 615 DPA.</p> <p>Para 4.20 states that land is already allocated in the Plan to account for 2,500 dwellings which will count towards the proposed housing requirement. However, no further evidence has been provided to support this figure, unclear which sites will count towards the housing requirement. Given that the Council will be assessing the Plan Period from 2018, any existing allocations will need to be considered against a revised housing trajectory to ensure there is no double counting.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	Option 4 is considered the most appropriate option to create flexibility and allow for a contingency beyond the need created by the standard methodology. It is stressed within the guidance (Paragraph 35) that this is the minimum which should be done for a plan to be found 'sound' and that agreements with other authorities should ensure unmet need for neighbouring areas; particularly Redditch and Birmingham, in this instance. The Council should also monitor the building within the District while the Plan Review is being progressed to ensure that any lapse/delivery rates are fully taken into account.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	46	Ian	Mercer	Bruton Knowles	Church of England	We consider that option 4 is the most appropriate option. As referred to in Q. SI 2, the Council should seek to meet local housing needs and the unmet needs of neighbouring authorities (Greater Birmingham Housing Market). Increasing the number of allocations, across a wide range of sites and market areas, will maximize housing delivery. This will reduce reliance on a small number of large scale sites, such developments are frequently held up due to unforeseen circumstances and the discharging of conditions.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	47	Michael	Jones	Caddick Land		Option 4. The calculation of the case housing requirement for Bromsgrove adopting the standard methodology cannot be determined until the Government has confirmed the approach to be used and that is a matter that is still to be determined. Hence none of the options in Question SI8 can be relied upon. Notwithstanding the calculation of the standard methodology, there is a very strong case that Bromsgrove's housing requirement needs to take into account the need to rebalance the present unsustainable relationship between workforce and jobs within the District.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.
SI8	48	Grace	Allen	CBRE	Arden Park Properties	As identified in paragraph 4.20 of the Issues and Options Consultation Document Options 1, 2 and 3 all plan purely to meet Bromsgrove District's local housing needs with the exclusion of any cross-boundary growth and housing associated with higher economic growth. With an acute housing shortage across the GBBCHMA we consider that Option 4 would be most appropriate to provide for both the needs of Bromsgrove District but also for the wider HMA requirements.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	48	Grace	Allen	CBRE	Arden Park Properties	However, irrespective of planning for the wider HMA, it should be noted that NPPF paragraph 22 states that strategic policies should look ahead over a minimum 15-year period from adoption. Therefore, it is likely that the Bromsgrove District Plan review should be planning until at least 2036 (if it were to be adopted in 2021). Additionally, the GBBCHMA growth study assesses the requirement until 2036 and therefore the housing shortfall until this time is known and therefore appropriate to plan for.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	Option 4 – Irrespective of the length of the Plan period, allocate land for more homes than recommended by the standard methodology. Considering the use of standard methodology does not deliver 300,000 new homes nationally, and that additional land will be required for the housing needs generated by the employment strategy for the District, a figure higher than the standard methodology is suggested should be used. We also consider that it is advisable to build in some safety mechanism to allow additional land/alternative land to come forward, in the event that some allocated sites fail or take longer to come to fruition than planned. Some authorities use reserve sites, which are allocated specifically for such circumstances. Stratford on Avon have taken this approach and are progressing their reserve sites SPD. This would protect the council from speculative applications should the 5-year land supply drop. It would also provide a mechanism whereby land can be brought forward in a planned manner if the Housing Delivery Test indicates that action is required.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	50	Debbie	Farrington	Cerda Planning	The Trustees	Option 4 – Irrespective of the length of the Plan period, allocate land for more homes than recommended by the standard methodology. Considering the use of standard methodology does not deliver 300,000 new homes nationally, and that additional land will be required for the housing needs generated by the employment strategy for the District, a figure higher than the standard methodology is suggested should be used. We also consider that it is advisable to build in some safety mechanism to allow additional land/alternative land to come forward, in the event that some allocated sites fail or take longer to come to fruition than planned. Some authorities use reserve sites, which are allocated specifically for such circumstances. Stratford on Avon have taken this approach and are progressing their reserve sites SPD. This would protect the council from speculative applications should the 5-year land supply drop. It would also provide a mechanism whereby land can be brought forward in a planned manner if the Housing Delivery Test indicates that action is required.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>Claremont Planning, on behalf of Spitfire Home's, are of the view that Option 4 best presents an appropriate strategy moving forward for the emerging Plan and it is to realise the development requirements as indefinite through the Plan. In the first instance, Options 2 and 3 do not demonstrate an effective approach given that they cover an unrealistic time period and that changes in the identified need are more likely and substantially open to influences which may amend this requirement over a longer time period. This lessens the ability of the Plan to effectively deliver the required need and as such does not demonstrate a fully realised strategy that pro-actively underpins the development strategy of the emerging Local Plan.</p> <p>The emerging plan must ensure that it is able to demonstrate its statutory obligation in its Duty to Co-operate, especially with authorities within the Greater Birmingham HMA providing significant development pressures with the extent of unmet need arising from the conurbation. As such, Bromsgrove, as a directly adjacent authority with close functional and economic links with the conurbation, must demonstrate willingness to accommodate some of this growth in line with their statutory obligations. Therefore, the emerging Plan must be able to demonstrate that it has been able to take this into account alongside the need arising from Bromsgrove District itself. This will inevitably lead to a higher required need identified need and as such, the Plan will need to allocate more land that is recommended by the standard methodology. This best practice approach is more aligned with the requirements of the NPPF and of national guidance in general. This approach also provides a greater extent of flexibility that is able to take into account delivery and implementation, both of which are beyond the Council's control and with Option 4, the LPA will be able to more successfully mitigate itself against those aspects which can detrimentally impact on delivery and the realisation of the aspirations of the Local Plan.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	52	Tom	Ryan	Claremont Planning	Bellway Homes	<p>Claremont Planning, on behalf of Bellway Homes, are of the view that Option 4 best presents an appropriate strategy moving forward for the emerging Plan and it is to realise the development requirements as indefinite through the Plan. In the first instance, Options 2 and 3 do not demonstrate an effective approach given that they cover an unrealistic time period and that changes in the identified need are more likely and substantially open to influences which may amend this requirement over a longer time period. This lessens the ability of the Plan to effectively deliver the required need.</p> <p>The emerging Plan must ensure that it is able to demonstrate its statutory obligation in its Duty to Co-operate, especially with authorities within the Greater Birmingham HMA providing significant development pressures with the extent of unmet need arising from the conurbation. As such, Bromsgrove, as a directly adjacent authority with close functional and economic links with the conurbation, must demonstrate willingness to accommodate some of this growth in line with their statutory obligations. Therefore, the emerging Plan must be able to demonstrate that it has been able to take this into account alongside the need arising from Bromsgrove District itself.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	<p>Option 4 best presents an appropriate strategy moving forward for the emerging Plan and it is to realise the development requirements as indefinite through the Plan.</p> <p>Options 2 and 3 do not demonstrate an effective approach given that they cover an unrealistic time period and that changes in the identified need are more likely and substantially open to influences which may amend this requirement over a longer time period. This lessens the ability of the Plan to effectively deliver the required need and as such does not demonstrate a fully realised strategy that pro-actively underpins the development strategy of the emerging Local Plan.</p> <p>Given that the identified need and resultant numbers are based on the standardised methodology and that the Plan has not specifically demonstrate as to how these figures have been found, it cannot be regarded as properly produced.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	54	Katherine	Else	Claremont Planning	Miller Homes	Option 4 best presents an appropriate strategy moving forward for the emerging Plan and it is to realise the development requirements as indefinite through the Plan. In the first instance, Options 2 and 3 do not demonstrate an effective approach given that they cover an unrealistic time period and that changes in the identified need are more likely and substantially open to influences which may amend this requirement over a longer time period. It is advanced that this, which nullifies Option 1, alongside the inappropriate temporal periods of Options 2 and 3, result in only Option 4 being the best option for the Plan to incorporate into the emerging spatial strategy. The emerging Plan must ensure that it is able to demonstrate its statutory obligation in its Duty to Co-operate, especially with authorities within the Greater Birmingham HMA and Redditch, providing significant development pressures with the extent of unmet need arising from the conurbation. This best practice approach is more aligned with the requirements of the NPPF and of national guidance in general.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	In any event, the District should significantly boost the supply of housing through the plan making process. We consider if the plan is to be robust over time and ensure that a supply of land for housing can be made throughout the plan period (without need for continual review), there is strong argument to plan for a longer period and capture the opportunities that planning for greater growth now can bring in terms of securing supporting infrastructure investment and providing certainty over redrawn Green Belt boundaries.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	57	Karin	Hartley	Delta Planning	Bloor Homes Western	The first three options reflect the different proposed plan periods. Option 4 raises the question of whether irrespective of the length of the Plan period the Local Plan should allocate land for more homes than recommended by the standard methodology.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	58	Karin	Hartley	Delta Planning	Bloor Homes Western & Maximus	As outlined in response to Question Q.SI 5 [sic], we consider that the Local Plan should set out policies to cover a plan period to 2041. The District Council should revisit its housing needs calculations to base it on the latest available information and update the housing target to 2041 accordingly. It may also be necessary to review the needs following any revisions to the Standard Methodology as proposed by the Government. In addition to meeting local housing needs, the Local Plan also needs to make provision for meeting a proportion of the unmet need of neighbouring authorities.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	It would be appropriate for the Council to show their calculations and what affordability ratio and figures have been used to calculate the overall housing need. The housing figure to cover Bromsgrove should be higher than 6,500 dwellings and should sit between the levels set out in Option 1 and 2 for the plan period of 2018-2036.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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SI8	63	Fiona	Lee-McQueen	Framptons	Bellway Homes	The Plan will have to provide for well beyond the Plan period of 2036 as Bromsgrove District Council will have to allocate land for approximately 6,500 dwellings in this period to meet their own need and then allocate land for any of Birmingham's unmet housing need, and to safeguard land by removing it from the green belt to meet longer term needs.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	64	Peter	Frampton	Framptons	Mr I Rowlesge	Option 2	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	65	Louise	Steele	Framptons	Summix Ltd	<p>The Framework is clear that Plans will need to ensure the delivery of their strategy for housing and the main way of doing so is the allocation of specific, sustainable and deliverable sites.</p> <p>The Plan will have to provide for well beyond the Plan period of 2036 as Bromsgrove District Council will have to allocate land for approximately 6,500 dwellings in this period to meet their own need and then allocate land for any of Birmingham's unmet housing need.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	68	Nicole	Penfold	Gladmans		Option 4 is the most appropriate. Recommend that the Council should include a generous flexibility factor to ensure delivery of the necessary scale of housing over the course of the plan period. 20% above the proposed housing requirement.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	69	Latisha	Dhir	GVA	St Phillips	A 23 year plan period is the most appropriate. This would align with earlier work undertaken in respect of the GBHMA. Recommended that the Council review the quantum of dwellings under Option 2 and take into consideration the cross boundary strategic issues and accommodate a proportion of the housing shortfall identified within the GBHMA.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	72	Stephen	Peters			Option 3 is the most appropriate because it provides a degree of certainty for the foreseeable future.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	75	Rachel	Mythen	GVA	Taylor Wimpey	<p>The Council should review the quantum of dwellings under Option 2, and take into consideration the cross boundary strategic issues and accommodate a proportion of the housing shortfall identified within the Greater Birmingham Housing Market Area.</p> <p>Failure to identify and accommodate the wider HMA needs and distribution of additional housing within Bromsgrove will result in the plan failing the 'positively prepared' test as set out in the NPPF. The consequences of this will be that the plan is likely to be found unsound.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	76	Emily	Vyse	GVA	University of Birmingham	As things currently stand, and for the reasons described in answer to SI7, we are not satisfied that any of the options listed are sound.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	78	Sean	Rooney	Harris Lamb	Barratt Homes	We do not think options 1-3 accurately reflect the level of housing need in Bromsgrove as calculated using the standard method, therefore option 4 is considered the	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	80	John	Pearce	Harris Lamb	Bloor Homes	In light of our interpretation of the standard method set out above, we do not agree with either of Options 1 to 3 as they propose too low an annual dwelling requirement. Our view is that the annual requirement should be at least 413 dpa, rather than around 365 dpa figure used in the three options identified by the Council. Using the 413 dpa figure would give the overall dwelling requirement when multiplied by the plan period.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	80	John	Pearce	Harris Lamb	Bloor Homes	In respect of Option 4, we would be supportive of this option should the Council wish to pursue a pro-growth agenda. Guidance in the PPG (ID: 2a-010-20180913) states that Councils can plan for growth that the standard method is the minimum starting point in determining the number of homes needed in an area. Before committing to a pro-growth agenda, we would suggest that the Council's priority should be looking to meet its own unmet needs and a proportion of Birmingham's unmet need first.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	We do not think Options 1-3 accurately reflect the level of housing need in Bromsgrove using the standard method. Option 4 is considered the most appropriate, however it still inadequate. To meet long term local housing need and unmet need from neighbouring authorities, the Council should pursue and plan for growth by allocating more homes than recommended in the standard methodology.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	<p>Do not agree that either of Options 1 - 3 accurately reflect the level of housing need in Bromsgrove as calculated using the standard method. Notwithstanding the inaccuracy in the way that the Council's figure has been calculated we would clearly support the higher annual requirement of 413 dpa (rounded up) than the 361 - 366 dpa that the Council are proposing, irrespective over which period the Plan runs.</p> <p>Supportive of Option 4 should the Council wish to pursue a pro-growth agenda. Guidance in the PPG (ID: 2a-010-20180913) states that Councils can plan for growth and that the standard method is the minimum starting point in determining the number of homes needed in an area.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	<p>Do not agree that either of Options 1-3 accurately reflect the level of housing need in Bromsgrove as calculated using the standard method. Clearly support the higher annual requirement of 413 dpa irrespective over which period the Plan runs.</p> <p>Would be supportive of Option 4 should the Council wish to pursue a pro growth agenda.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	86	Rebecca	Anderson	Iceni Projects	Generator Developments	<p>We consider that Option 4 is the most appropriate, as this takes account of the need to incorporate economic growth within the housing target and the stronger 2016-based ONS figures. Given the shortfall of housing within the adopted Local Plan, and also the likely possibility of their SOAN to increase further due to the 2016-based household projections, the Council has the opportunity to plan pro-actively with an ambitious housing target. This option allows the Council to plan for a longer time period, and to plan for the highest housing numbers, therefore ensuring they have a robust and sound Plan going forward.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	87			Indenture		<p>None of the options appear reasonable or fair. Doesn't take account of the Birmingham overspill requirements and Bromsgrove's own needs should be in the region of 7,500 dwellings.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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SI8	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>The standard method is based on the latest household projections prepared by ONS, with an upward adjustment made in the case of all authorities where the affordability ratio is greater than 4. The 2016-based household projections were published on 20 September 2018 – after the Issues and Options Consultation document was drafted. As a result, the figures set out in paragraph do not reflect the most up-to-date standard method calculations.</p> <p>Bromsgrove District is one of the few local authorities that has bucked the national trend. The housing need associated with the 2016-based household projections is higher than that derived from the 2014-based projections. Applying the methodology currently set out in the NPPF and PPG generates a standard method figure of 412dpa for Bromsgrove District. Based on our recommended Plan period of 2018-2041 (23 years), this results in a total housing need of 9,476 dwellings for Bromsgrove District alone.</p> <p>If this proposed change is brought into effect the adjusted housing need figure for Bromsgrove will be 373dpa between 2018 and 2028. Although lower than the figure identified by the standard methodology using the 2016-based SNHP, it remains slightly above the FOAN for Bromsgrove that informed the current Local Plan requirement. The 2016-based household projections resulted in a reduction in the standard method figures for Birmingham and Redditch (to 3,247dpa and 142dpa respectively). However, the proposed changes to the standard methodology would generate a much higher level of housing need (3,577 and 186dpa respectively). Furthermore, the standard methodology does not consider future changes to economic circumstances, and the PPG recognises that “there will be circumstances where the actual housing need may be higher than the figure identified in the standard methodology” and that “the government is committed to ensuring more homes are built and are supportive of authorities who want to plan for growth”. Taking account of considerations such as growth strategies and planned strategic infrastructure improvements, these authorities may decide to plan for a level of housing that is greater than the standard method figure.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	89	Reuben	Bellamy	Lone Star Land	Cleint	<p>Option 4 is considered to be the most appropriate strategy. Paragraph 60 of the NPPF sets out that the standard methodology is the MINIMUM number of homes needed. Elsewhere in the Issues and Options document, the economic issues facing the District such as out-commuting and low local wages. The local plan will no doubt set an employment strategy and make the necessary allocations to deal with those issues. As the standard methodology does not take into account any housing needs that would flow from the employment strategy, a higher level of growth must be planned for. In addition, the standard methodology does not take into account the unmet needs of adjoining Districts. Whilst the actual figure is not yet known, it is clear that Bromsgrove will need to take its share of unmet needs from Birmingham and the Black Country.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	90	Owen	Jones	LRM Planning	Persimmon Homes	<p>We believe Option 4 is the most appropriate: allocating land for more homes than recommended by the standard methodology.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	91	Max	Plotnek	Maddox Planning	David Goldstein	<p>Option 4 - The Greater Birmingham Housing Market Assessment Strategic Growth Study (“SGS”) (2018) demonstrates that across the Housing Market Area (HMA), there is a shortfall in planned provision to meet housing need. Therefore, in accordance with the Duty to Cooperate required by the Framework, neighbouring authorities in the HMA will need to explore the potential to accommodate the housing shortfall within their boundaries. On this basis, Bromsgrove may need to plan for a greater number of new dwellings than the figure specified for Bromsgrove in the 2014-based projections.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	92	Andrew	Watt	Maze Planning Solutions	Client	Option 4 should be preferred. Irrespective of the length of the Plan period, the Council should make provision for more homes than recommended by the standard methodology in order to: i. Support above trend levels of employment growth. ii. Increase the certainty of housing being delivered at a rate that will meet the identified need from a wide choice and range of sites	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.
SI8	93	Gary	Moss	MSC Planning Consultants	Client	Option 4 - Support - In order to build safeguards into housing land supply issues, irrespective of the plan allocation of more homes to allow for fluctuations in site delivery/needs etc..	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	94			Nigel Gough Associates	Aniston Ltd	None of the options is reasonable or fair. Doesn't take proper account of Birmingham's overspill requirement. Bromsgrove needs to provide for its own housing needs, around 7,500 dwellings.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	95			Nigel Gough Associates	Monksgraston Ltd	None of the above Options appears reasonable or fair. Firstly it does not take account properly of Birmingham's overspill requirement under their Adopted Development Plan where the figure to assist Birmingham needs to be closer to 7,000 dwellings. In addition Bromsgrove needs to provide for its own domestic needs up to 2036 and that should be a figure in the region of 7,500 dwellings . It is vitally important that the major growth for the Bromsgrove District itself should be around Bromsgrove Town.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	96			Nigel Gough Associates	Mr Stapleton	<b>*LAND AT THE ELMS, ROCK HILL*</b> None of the options are reasonable or fair. They do not take into account Birmingham's overspill requirement under their adopted plan, where the figure to assist Birmingham needs to be around 10,000 dwellings. Bromsgrove needs to provide for its own needs up to 2036 and should have a figure around 7,500 dwellings. It is vitally important that major growth for the district should be around Bromsgrove Town.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	96			Nigel Gough Associates	Mr Stapleton	<b>*LAND FRONTING SHAW LANE, STOKE PRIOR*</b> None of the options are reasonable or fair. They do not take into account Birmingham's overspill requirement under their adopted plan, where the figure to assist Birmingham needs to be around 10,000 dwellings. Bromsgrove needs to provide for its own needs up to 2036 and should have a figure around 7,500 dwellings.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	None of the above options appear reasonable or fair. Do not take account of Birmingham's overspill requirement under the adopted plan where the figure to assist needs to be close to 10,000 dwellings. Bromsgrove's own domestic needs up to 2036 should be a figure in the region of 7,500 dwellings.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	98	Sally	Oldaker			I agree with Option 1: Allocate land for about 6,500 dwellings up to 2036 – because I think the Plan should only go up to 2036, so that you're not committing to something massively unsustainable.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	99	Mark	Dauncy	Pegasus	Gallagher Estates	Option 4 is the most appropriate strategy. The figures presented within options 1-3 exclude any cross boundary growth and housing associated with higher economic growth.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	100	Ryan	Bishop			Option 4 – based on the size of the task I believe it should be performed in smaller activities/chunks of work due to constraints within the council (we need to ensure we do a thorough job and don't take on too much that opens the district up to larger scrutiny).	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	103	Chris	May	Pegasus	Persimmon Homes	<p>Option 4 - Support this option as it recognises that any calculation or formula alone cannot provide the basis for the number of dwellings which should be provided in the District over the plan period.</p> <p>Options 1 to 3 have been derived from the Government's new standard method, using the 2014—based household projections. They do not include any provision for either un-met need arising in neighbouring areas or to support economic growth.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	The figures for housing are not correct. Given government recent pronouncements it is wholly inappropriate to seek to quantify the housing need pending further policy announcements & statistical data due soon.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	A combination of Option 3 and Option 4 is the most appropriate. In accordance with NPPF para 130, there is a need to ensure that Green Belt Boundaries have long term permanence, and so the current Plan should ensure that sufficient land is allocated to meet current need and potential future need through allocating safeguarded land. The potential requirement from the wider West Midlands Conurbation should also be allowed for in appropriate locations at this stage, given that the need has been defined in the Greater Birmingham HMA Strategic Growth Study (GL Hearn). Furthermore, housing supply should be increased to improve affordability.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Option 4 is the most appropriate approach, or the council will have not taken account of the serious affordability crisis in the District, nor the need to reduce out-commuting and improve opportunities for jobs growth.  The OAN for Bromsgrove District has been prepared using the 2016 household projections, in line with the current Standard Methodology set out in the NPPF and the PPG. Following the release of the NPPF in 2018 the Government are now consulting on revisions to the NPPF and PPG. The Government are considering changing the Standard Methodology and may require Councils to use the 2014 household projections to calculate their OAN. Therefore, there is a risk the Council will have to reassess their OAN once this consultation has ended, which will delay the adoption of the Local Plan.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of SI8, we consider Option 4 is the most appropriate approach, or the council will have not taken account of the serious affordability crisis in the District, nor the need to reduce out-commuting and improve opportunities for jobs growth. The OAN for Bromsgrove District has been prepared using the 2016 household projections, in line with the current Standard Methodology set out in the NPPF and the PPG. Following the release of the NPPF in 2018 the Government are now consulting on revisions to the NPPF and PPG. The Government are considering changing the Standard Methodology and may require Councils to use the 2014 household projections to calculate their OAN. Therefore, there is a risk the Council will have to reassess their OAN once this consultation has ended, which will delay the adoption of the Local Plan.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.
SI8	112	Gareth	Sibley	RCA Regeneration	Piper Group	Option 4 is the most appropriate, or the Council will not have taken into account the serious affordability crisis, nor the need to reduce out commuting and improve opportunities for jobs growth.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.
SI8	113	Gareth	Sibley	RCA Regeneration	CAD Square	At paragraph 4.20 we note that the council refer to 'about' the following number of dwellings. This should be changed to 'at least', particularly as (by the council's own admission) this is 'purely to meet Bromsgrove District's local housing needs'. We consider Option 4 is the most appropriate approach, or the council will have not taken account of the serious affordability crisis in the District, nor the need to reduce out-commuting and improve opportunities for jobs growth.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	114	Charles	Robinson	Rickett Architects	Cawdor	Option 4: The approach BDC will decide upon will involve strategic allocations which always take longer than expected to deliver. To ensure housing needs are met in full, it will be essential to allocate more housing that will allow flexibility of deliverability.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	115	John	Breese	Rosconn Strategic Land		<p>Option 4 is the only option that is supported by the NPPF paragraph 60 and PPG paragraph 10 which makes clear using the standard methodology provides the minimum number of homes needed which should be used as a starting point. NPPF Paragraph 60 further states that in addition to the local housing needs figure, any housing needs that cannot be met within neighbouring areas should also be taken into account. In the case of Bromsgrove District this would mean the unmet need from neighbouring authorities such as Redditch and Birmingham in the context of the Birmingham and Black Country Housing Market Area.</p> <p>A further uplift from the standard methodology local housing needs figure is also required to support the Government's objective of addressing the affordability of homes and ambitions of economic growth.</p> <p>Consider that the housing needs figure identified should also provide sufficient contingency and flexibility within the Local Plan by identifying additional housing allocations to deliver a further 10%. This level of contingency would provide a buffer within the housing supply to mitigate against any unforeseen reduction in delivery rates which might impact the Council's five-year housing land supply, such as non-delivery of allocated or windfall sites. This approach is advocated by the Government's in paragraph 11a of the NPPF that states Plans should be sufficiently flexible to adapt to rapid change.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	Support Option 4 and that any housing requirement should be expressed as a minimum.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	119	Darren	Oakley	RPS Group	Gleeson	Given that the main purpose of the early plan review is to address the acknowledged shortfall in housing land to meet local needs, as well as contribute to meeting cross-boundary unmet needs, RPS support option 4 and that any housing requirement should be expressed as a minimum. This will however need to be informed by further growth studies which seek to align the expectations of future growth with wider economic aspirations of the Local Economic Partnership and any unmet need arising from neighbouring authorities.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	120	Michael	Davies	Savills	Cala Homes	Option 4 is the most appropriate. Housing requirements in Local Plans should be considered as a minimum requirement . All too often a maximum approach fails to provide the range and quality of sites required to meet housing targets. Consider that all local authorities should increase their housing requirement in order to support the HMA.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	122	Michael	Davies	Savills	Landowners	We consider that 'Option 4: Irrespective of the length of the Plan Period, allocate land for more homes than are recommended by the standard methodology' is the most appropriate. Although we expressed our opinion on what we consider to be the preferred plan period, we believe that all authorities should allocate land for more homes than are recommended by the standard methodology. Housing requirements in local plans should be considered as a minimum requirement and in accordance with paragraph 16 of the NPPF, plans should be aspirational. This will ensure that an acceptable range and quality of sites is provided which can meet housing requirements.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	123	Michael	Burrows	Savills	Landowners	Option 4 - All authorities should allocate land for more homes than are recommended by the standard methodology. Housing requirements in Local Plans should be considered as a minimum requirement and in accordance with paragraph 16 of the NPPF, plans should be aspirational. This will ensure that an acceptable range and quality of sites can be provided to meet the District's housing requirements.  BDC should provide greater clarity on how it is using the standardised methodology to calculate housing need i.e. what household-based projections BDC is using and how BDC is planning to take account of unmet cross boundary needs. BDC should be increasing its housing need to take account of its necessary contribution to meet the additional housing requirement for the Birmingham HMA area.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	125	Alastair	Thornton	Simply Planning	Woodpecker Plc	In terms of question Q. SI.7 (Strategic Objective 7) [Q.SI8] we concur with Option 4. Allocating more land than is actually recommended, through the standard methodology should, in our view, be the preferred approach. The Council should endeavour to allocate a variety of land to support the Government's clear objective of 'significantly boosting the supply of homes' (paragraph 59 NPPF). It is only by allocating more land that appropriate flexibility in allowing for market forces to bring forward development at the most appropriate locations will prevail. Adopting a too prescriptive housing allocation stance will, ultimately, constrain housing land supply thus increasing pressures for development even further.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.
SI8	126	Rachel	Best	Stansgate Planning	Access Homes LLP	Option 4  An option higher than Standard Methodology is supported, particularly to allow for cross boundary growth.  A higher level of housing is appropriate because the Standard Methodology only makes provision for local need and does not include any cross-boundary growth or any housing associated with higher economic growth. The Plan ignores the fact that the housing market area that the district is within has a major shortfall in sites for housing as Birmingham is unable to accommodate its full objectively assessed need within its boundary, to the extent that a shortfall of around 38,000 houses is identified in the Birmingham Plan. As yet the shortfall has not been apportioned between adjoining authorities and this apportionment needs to be resolved to allow the Bromsgrove plan to progress.  There appears to be an acknowledgement by the District Council that it will accommodate some cross-boundary growth to meet the needs of the conurbation and the quantity must be identified now to allow a suitable distribution strategy to be prepared.  Some of the options for development distribution are aimed at locations best placed to meet a cross boundary need but until the scale of the need is known the development distribution cannot be confirmed.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.
SI8	127	Rachel	Best	Stansgate Planning	AE Becketts and Sons Ltd	An option higher than the Standard Methodology is supported, to allow for cross boundary growth. As yet the shortfall has not been apportioned between adjoining authorities and this apportionment needs to be resolved to allow the Bromsgrove Plan to progress.  Some of the options are aimed at locations best placed to meet a cross boundary need, but until the scale of the need is known the development distribution cannot be confirmed.	Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)  Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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SI8	128	Rachel	Best	Stansgate Planning	J Rigg Construction Ltd	<p>An option higher than Standard Methodology is supported, particularly to allow for cross boundary growth.</p> <p>A higher level of housing is appropriate because the Standard Methodology only makes provision for local need and does not include any cross-boundary growth or any housing associated with higher economic growth. The Plan ignores the fact that the housing market area that the district is within has a major shortfall in sites for housing as Birmingham is unable to accommodate its full objectively assessed need within its boundary, to the extent that a shortfall of around 38,000 houses is identified in the Birmingham Plan. As yet the shortfall has not been apportioned between adjoining authorities and this apportionment needs to be resolved to allow the Bromsgrove plan to progress.</p> <p>There appears to be an acknowledgement by the District Council that it will accommodate some cross-boundary growth to meet the needs of the conurbation and the quantity must be identified now to allow a suitable distribution strategy to be prepared.</p> <p>Some of the options for development distribution are aimed at locations best placed to meet a cross boundary need but until the scale of the need is known the development distribution cannot be confirmed.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	129	Rachel	Best	Stansgate Planning	Midlands Freeholds Ltd	<p>Option 4 - A higher level of housing is appropriate because the Standard Methodology only makes provision for local need and does not include any cross-boundary growth or any housing associated with higher economic growth. The Plan ignores the fact that the housing market area that the district is within has a major shortfall in sites for housing as Birmingham is unable to accommodate its full objectively assessed need within its boundary, to the extent that a shortfall of around 38,000 houses is identified in the Birmingham Plan. As yet the shortfall has not been apportioned between adjoining authorities and this apportionment needs to be resolved to allow the Bromsgrove plan to progress.</p> <p>There appears to be an acknowledgement by the District Council that it will accommodate some cross-boundary growth to meet the needs of the conurbation and the quantity must be identified now to allow a suitable distribution strategy to be prepared.</p> <p>Some of the options for development distribution are aimed at locations best placed to meet a cross boundary need but until the scale of the need is known the development distribution cannot be confirmed.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	130	Rachel	Best	Stansgate Planning	Ms and Ms J Mondon Lines	<p>An option higher than Standard Methodology is supported, particularly to allow for cross boundary growth.</p> <p>A higher level of housing is appropriate because the Standard Methodology only makes provision for local need and does not include any cross-boundary growth or any housing associated with higher economic growth. The Plan ignores the fact that the housing market area that the district is within has a major shortfall in sites for housing as Birmingham is unable to accommodate its full objectively assessed need within its boundary, to the extent that a shortfall of around 38,000 houses is identified in the Birmingham Plan. As yet the shortfall has not been apportioned between adjoining authorities and this apportionment needs to be resolved to allow the Bromsgrove plan to progress.</p> <p>There appears to be an acknowledgement by the District Council that it will accommodate some cross-boundary growth to meet the needs of the conurbation and the quantity must be identified now to allow a suitable distribution strategy to be prepared.</p> <p>Some of the options for development distribution are aimed at locations best placed to meet a cross boundary need but until the scale of the need is known the development distribution cannot be confirmed.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	132	Rachel	Best	Stansgate Planning	Mrs L Bastable	<p>An option higher than Standard Methodology is supported, particularly to allow for cross boundary growth.</p> <p>A higher level of housing is appropriate because the Standard Methodology only makes provision for local need and does not include any cross-boundary growth or any housing associated with higher economic growth. The Plan ignores the fact that the housing market area that the district is within has a major shortfall in sites for housing as Birmingham is unable to accommodate its full objectively assessed need within its boundary, to the extent that a shortfall of around 38,000 houses is identified in the Birmingham Plan. As yet the shortfall has not been apportioned between adjoining authorities and this apportionment needs to be resolved to allow the Bromsgrove plan to progress.</p> <p>There appears to be an acknowledgement by the District Council that it will accommodate some cross-boundary growth to meet the needs of the conurbation and the quantity must be identified now to allow a suitable distribution strategy to be prepared.</p> <p>Some of the options for development distribution are aimed at locations best placed to meet a cross boundary need but until the scale of the need is known the development distribution cannot be confirmed.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	133	Rachel	Best	Stansgate Planning	Mr C Detloff	<p>An option higher than the Standard Methodology is supported, to allow for cross boundary growth. As yet the shortfall has not been apportioned between adjoining authorities and this apportionment needs to be resolved to allow the Bromsgrove Plan to progress.</p> <p>Some of the options are aimed at locations best placed to meet a cross boundary need, but until the scale of the need is known the development distribution cannot be confirmed.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	136	Kathryn	Young	Turley	Land Fund	<p>As noted in our clients response to Q. SI 7, it is unclear what assumptions BDC have adopted in the standard method to arrive at the figures for Options 1 to 3.</p> <p>The consultation document pre-dates the recent MHCLG consultation paper (October 2018) on updates to national policy and guidance which requires the method to use the 2014-based Household Projection. However, the quoted figures do not align with Turley's own calculation using the standard method when applying either the 2014 or 2016-based Household Projection figures and the 2017-based affordability ratio (March 2018); Turley's figures are 373dpa and 412dpa respectively.</p> <p>BDC's figures most closely align with the 2014-based Household Projections from Turley's own application of the standard method but there remains a difference of c.200 dwellings in each case which is not insignificant. The most logical explanation for this difference is that BDC may have relied upon a "baseline" of 2016-26 to arrive at its figures whereas Turley has applied a baseline of 2018-28. The latter is the correct approach under the PPG which states that in: "Setting the baseline (Step 1) the 10 year period (...) "should be 10 consecutive years, with the current year being the first year".</p> <p>Our client strongly recommends that BDC clarify the assumptions that have been applied to produce the three options presented in the document.</p> <p>Notwithstanding the above and as noted in relation to Q.SI 7, it must be recognised that the standard methodology will determine the minimum number of homes needed. It is therefore apparent that only Option 4 would deliver a greater level of homes compared to the standard methodology's 'starting point'. As outlined in response to Question Q.SI 9, BDC will need to allocate more land than recommended by the standard method given the need to make an appropriate contribution towards the unmet needs of the HMA. Land Fund therefore support Option 4.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	137	Matthew	Fox	Turley	Redrow Homes	<p>As noted in response to Q. SI 7, it is unclear what assumptions BDC have adopted in the standard method to arrive at the figures for Options 1 to 3.</p> <p>It is recognised that the consultation document pre-dates the recent MHCLG consultation paper (October 2018) on updates to national policy and guidance which requires the method to use the 2014-based Household Projection but the quoted figures do not align with Turley's own calculation using the standard method when applying either the 2014 or 2016-based Household Projection figures and the 2017-based affordability ratio (March 2018); Turley's figures are 373dpa and 412dpa respectively.</p> <p>See table provided which shows Turley's assessment of minimum need for each option using both Household Projections.</p> <p>BDC's figures most closely align with the 2014-based Household Projections from Turley's own application of the standard method but there remains a difference of c.200 dwellings in each case which is not insignificant.</p> <p>We suspect that BDC may have relied upon a "baseline" of 2016-26 to arrive at its figures whereas Turley has applied a baseline of 2018-28. The latter is the correct approach under the PPG which states that in "Setting the baseline" (Step 1) the 10 year period "...should be 10 consecutive years, with the current year being the first year". We would therefore encourage BDC to publish its assumptions in full.</p> <p>Notwithstanding the above and as noted in relation to Q.SI 7, it must be recognised that the standard methodology will determine the minimum number of homes needed. It is therefore apparent that only Option 4 would deliver a greater level of homes compared to the standard methodology's 'starting point'. As outlined in response to Question Q.SI 9, BDC will need to allocate more land than recommended by the standard method given the need to make an appropriate contribution towards the unmet needs of the HMA. Redrow therefore support Option 4.</p> <p>Finally, it must be recognised that the assumptions (household projections and affordability ratios) underpinning the standard method are likely to change over the LPR programme, and it is also possible that the Government will</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	138	Charles	Robinson	Twelvetwentyone	Landowners	<p>Option 4: The approach BDC will decide upon will involve strategic allocations that always take longer than expected to deliver. To ensure housing needs are met in full it will be essential to allocate more housing that will enable flexibility of deliverability.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	139	Glenda	Parkes	Tyler Parkes	Oakland Developments	<p>The housing numbers proposed in the Issues and Options consultation document (Options 1 to 3 above) do not therefore meet the legal requirements under the Duty to Cooperate to agree a way forward and cooperate on strategic matters that cross administrative boundaries – including housing need.</p> <p>Currently there is no signed agreed 'statement of common ground' in respect of the housing land supply shortfall in the HMA. Therefore the housing figures suggested in the Issues and Options consultation document are misleading as they do not set out the full housing need as they do not include an allowance for cross-boundary need, contrary to national policy and legal requirements.</p> <p>It is important that the Bromsgrove Plan Review should aim to 'future proof' the strategic policies and housing need figures as far as practicable to avoid the need to undertake a full plan update of policies at least every 5 years. On this basis, we strongly recommend adoption of an amended Option 4 as follows: 'Irrespective of the length of the Plan period, allocate land for more homes than recommended by the standard methodology plus the cross-boundary housing growth agreed in an agreed statement of common ground'.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	156	Fred	Carter			I favour Option 4 because a number of Consented sites do not come forward for delivery or are seriously delayed. Even public sector land which should have been developed 3 or 4 years ago such as the old Council House and old Library/Fire Station end up being seriously delayed due to inaction by Place Partnership.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	161	Ian	Macpherson		Self	Option 2 but need to exclude significantly more land from the Green Belt for future development including housing.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	165	Johanna	Wood			Option 2: which has to be linked to appropriate strategic Social and transport infrastructure development to effectively support this increase	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p> <p>Infrastructure and its delivery forms an integral part of the plan making process.</p>
SI8	166	John	Gerner			Option 3. A serious flaw in the current plan is that planning decisions are based on 2030 traffic flows and spatial distribution of committed sites which exclude the cumulative impact arising from the allocation of sites for the additional 2300 homes that the district commits to provide by 2030.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p> <p>Infrastructure and its delivery forms an integral part of the plan making process.</p>
SI8	171	Mark	Cooper			I prefer Option 4, with the suggestion of 15,000 dwellings to 2050	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI8	174	Michael	Corfield			Allocate land for about 6,500 dwellings up to 2036.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
SI8	190	Philip	Ingram			Options 2 and 4 are most appropriate. The plan period should be extended and in addition to the LHN, should add growth to support economic growth, deliver affordable housing and to meet unmet housing needs from Birmingham.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p>
SI8	192			Dodford with Grafton Parish Council		No view on the numbers of dwellings, except that the supporting infrastructure must come first, and any development must preserve and enhance the appeal of the county not detract from it.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p> <p>Infrastructure and its delivery forms an integral part of the plan making process.</p>
SI8	194	Darren	Oakley	RPS	Clients	Given that the main purpose of the early plan review is to address the acknowledged shortfall in housing land to meet local needs, as well as contribute to meeting cross-boundary unmet needs, RPS support Option 4 and that any housing requirement should be expressed as a minimum.	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.</p>
<b>Q.SI9: Do you have any other comments on the above options?</b>							
SI9	1	Tammy	Williams	Alvechurch Parish Council		No need for option 4 as it would apply a certain amount of guess work and unnecessarily employ poor use of land resources, whilst contravening National recommendations	Irrespective of the length of the Plan period, the Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI9	10	Patricia	Dray	Highways England		<p>Combined Answer to Questions 8 and 9</p> <p>As it will be necessary for Bromsgrove to work with the Birmingham and Black Country areas to consider the Housing Market Area (HMA) growth, the length of time period selected and lands identified, should be considered in this wider context. Clearly should the higher levels of growth be selected the plan period is likely to lengthened to accommodate the achievable build-out rates.</p> <p>More importantly as discussed in our responses to the transport related questions, below, all housing development options are likely to require infrastructure investment, in some cases at substantial levels, to accommodate the proposed growth. In this context a critical mass of housing development would be required to provide sufficient funding for both infrastructure and other transport interventions.</p> <p>The question of whether the standard approach to local housing need is taken or otherwise is a matter for the Council. Highways England's role in the plan making process is to aim to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the strategic road network rather than to address the detail of the housing need calculation.</p>	<p>Noted. The rationale for the length of the Plan period has been explored through the responses to Q.SI4 (What timescale do you think the Plan period should cover and why?)</p> <p>The Standard Methodology represents the starting point for determining a housing requirement within the District for the Plan period, and that other considerations will need to be explored to inform the housing requirement for the District, including links between housing and employment.</p> <p>Infrastructure and its delivery forms an integral part of the plan making process.</p>
SI9	11	Rosamund	Worrall	Historic England		The Plan will need to consider the interrelationship between the historic environment and housing growth.	Noted. This will form part of the site selection criteria as the Council approaches the Preferred Options version of the Plan.
SI9	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council have the view that using the 2016 figures for projected housing need would reduce the need for greenbelt development.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	13			Natural England		We recommend that this decision is based upon a sound evidence base. This should include environmental evidence including biodiversity and green infrastructure.	Noted.
SI9	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Important to underpin allocation decisions with appropriate environmental information and SA scrutiny. Wish to reiterate the need for Council to develop a robust environmental evidence base on which sensible judgements can be made about numbers and distribution of dwellings and associated infrastructure.	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p> <p>Distribution of dwellings will be informed by the Council's principles for development, site selection evidence and SA.</p>
SI9	20	P	Harrison	Wythall Parish Council		When considering housing need the Plan should not overlook the provision of limited mobile home sites and residential use of the canal system to suit varied lifestyle choices.	Noted.
SI9	26	Kelly	Harris	South Staffordshire District Council		South Staffordshire Council does have some concerns with respect to the level of detail within the Issues and Option Document relating to the findings and implications of the West Midlands Growth Study. Strategic Issue 3 'Rebalancing the housing market' identifies a range of housing provision though these figure relate to differing plan period timescales and not to varying levels of annual housing growth. It is considered that a more meaningful approach would have included a range of annual housing growth options, thereby setting out options for the district to contribute towards the wider Housing Market Area shortfall.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	35	Peter	King	Campaign to Protect Rural England		If greater allocations are made, they should be as Safeguarded Land, not land immediately available for development, as that would undermine the government's manifesto policy of "brownfield first".	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p> <p>The issue of safeguarded land is addressed in Q.SI12.</p>
SI9	37	Julie	O'Rourke	Tetlow King Planning	Housing Association Registered Providers Planning Consortium	<p>The National Planning Policy Framework (NPPF, 2018) has a commitment to significantly boost the supply of homes through ensuring that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. This should lead to a higher overall provision of affordable housing across the district.</p> <p>Increasing the supply of affordable housing should be a priority for the Council especially as the ratio of house prices to incomes is now at 9.9, with average earnings is approximately £30,342 and the average house price at £299,400 (Home Truths 2017/18). This ratio is predicted to increase as house prices continue to rise and average wages continue to stagnate, placing increasing pressure on affordability and the need for an improved housing 'offer' across Bromsgrove.</p>	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p> <p>The issue of affordability and the housing offer within the District will be addressed through HEDNA work which will form part of the evidence base.</p>
SI9	42			Wythall Residents Association		When considering housing need the Plan should not overlook the provision of mobile home sites to suit lifestyle choices.	Noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI9	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Note that the housing numbers set out in options 1-3 do not take account unmet need arising from Birmingham City. Whilst the Plan Period has yet to be agreed, considered necessary for land to be safeguarded to accommodate development needs beyond the Plan Period. The figures set out at paragraph 4.20 forms only a single component of the District's overall housing requirement. This will need to be updated to include unmet need arising from the West Midlands conurbation as well as safeguarded land.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.  The issue of safeguarded land is addressed in Q.SI12.
SI9	48	Grace	Allen	CBRE	Arden Park Properties	As identified in the National Planning Policy Guidance for Housing Need Assessment (revised September 2018), the standard method for assessing local housing need, “uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply” (our emphasis). Whilst further revisions are expected following the publication of the latest population figures, the principle of identifying a minimum should be at the forefront of identifying a housing requirement figure. In line with this, and in order for the Plan to meet Examination ‘soundness’ criteria in NPPF paragraph 35 (in particular a) positively prepared], the Plan should be seeking minimum housing requirements in whichever option it takes forward, particularly addressing the wider HMA needs. As such, we suggest that the policy wording should identify a minimum such as “Land is allocated for a minimum of [xx] dwellings for the period 2018 – 2036...”	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. This will inform how the Plan's policies are worded later in this process.
SI9	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	The emerging Plan must ensure that it is able to demonstrate its statutory obligation in its Duty to Co-operate, especially with authorities within the Greater Birmingham HMA providing significant development pressures with the extent of unmet need arising from the conurbation. As such, Bromsgrove, as a directly adjacent authority with close functional and economic links with the conurbation, must demonstrate willingness to accommodate some of this growth in line with their statutory obligations. Therefore, the emerging Plan must be able to demonstrate that it has been able to take this into account alongside the need arising from Bromsgrove District itself. This will inevitably lead to a higher required need identified need and as such, the Plan will need to allocate more land that is recommended by the standard methodology. This best practice approach is more aligned with the requirements of the NPPF and of national guidance in general. This approach also provides a greater extent of flexibility that is able to take into account delivery and implementation, both of which are beyond the Council's control and with Option 4, the LPA will be able to more successfully mitigate itself against those aspects which can detrimentally impact on delivery and the realisation of the aspirations of the Local Plan.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	We suggest that a Green Belt Review should assess each of the growth periods set out in para 4.20 in order to test each option in terms of the short, medium and long term Green Belt boundary change which may result. This would assist in a robust evidenced judgement being able to be made about both the acceptability of Green Belt change, and the longevity of any such change.	Noted. However, it is unlikely that the amount of Green belt land needed to accommodate housing growth for any given period would be a determining factor relating to the length of the Plan period. However it is likely that the issue of the longevity of any Green Belt boundary changes will need to be considered to ensure that they endure beyond this Plan period. The issue of safeguarded land is addressed under Q.SI12. Furthermore, it is worth reiterating that SA is an integral part of the plan making process.
SI9	57	Karin	Hartley	Delta Planning	Bloor Homes Western	We consider that the Local Plan should set out policies to cover a plan period to 2041. The District Council should revisit its housing needs calculations to base it on the latest available information and update the housing target to 2041 accordingly. It may also be necessary to review the needs following any revisions to the Standard Methodology as proposed by the Government. In addition to meeting local housing needs, the Local Plan also needs to make provision for meeting a proportion of the unmet need of neighbouring authorities.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	72	Stephen	Peters			When considering housing need the Plan should not overlook the provision of limited mobile home sites and residential use of the canal system to suit varied lifestyle choices.	Noted.
SI9	78	Sean	Rooney	Harris Lamb	Barratt Homes	None of the options includes any housing that is provided to meet the unmet housing needs of Birmingham. It is imperative that this is decided soon.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	79	Shamim	Brown			I think a mix of property is desirable. Affordable housing is clearly necessary to encourage lower paid workers particularly in Bromsgrove Centre. But higher value housing stock is needed to encourage existing homeowners to “move up” and release starter homes to the younger generation. I am against a high density of apartment blocks which will spoil the rural nature of the district. There is already too much of this development in Birmingham.	Noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI9	80	John	Pearce	Harris Lamb	Bloor Homes	Paragraph 4.20 of the consultation document states that none of the options includes any housing that is to be provided to meet the unmet housing needs of Birmingham. The Council are yet to agree with Birmingham and the remaining HMA authorities what their split of Birmingham's unmet needs they are willing to accommodate. Once this has been agreed, the annual housing requirement for the Council will be higher than those set out in the three options. We, therefore, consider it is imperative that the Council looks to agree its share of Birmingham's unmet needs soon, so that it can focus on identifying the correct number and type of sites for inclusion within the emerging Local Plan review.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	The Issues and Options (para.4.20) confirms none of the spatial options includes any housing to meet the unmet housing needs of Birmingham. The overall housing requirement will increase once all the authorities within the HMA agree on what proportion of unmet needs they are willing to accommodate. It is imperative this decision is made soon.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Paragraph 4.20 of the consultation document states that none of the options includes any housing that is to be provided to meet the unmet housing needs of Birmingham. Clearly, when the Council, along with the other authorities in the Greater Birmingham HMA come to an agreement on what proportion of Birmingham's unmet needs each are willing to accommodate this would then need to be factored into the overall housing requirement. The upshot will be that the proposed housing requirement will be higher than that set out in the consultation document.  It is, therefore, imperative that the Council comes to an agreement soon with Birmingham and the other HMA authorities as to what level of housing they will accommodate as this will influence how much land the Council will need to release from the Green Belt and which sites will need to be allocated as a result.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	It is imperative that the Council comes to an agreement soon with Birmingham and the other HMA authorities as to what level of housing they will accommodate as this will influence how much land the Council will need to release from the Green Belt and which sites will need to be allocated as a result.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	86	Rebecca	Anderson	Iceni Projects	Generator Developments	Any figure will also need to accommodate the overspill from Birmingham too. Our note in Appendix A4 sets out how a fair proportion of growth might be calculated. 6,440 – 8,440 dwellings over the period to 2031 and clearly additional housing will be needed for the period beyond 2031	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	87			Indenture		Continuing requirement for Bromsgrove to provide for Birmingham's overspill and therefore further land should be identified in the GB and identified as Areas of Safeguarded Land capable of being released appropriately.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.  The issue of safeguarded land is addressed in Q.SI12.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI9	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>The standard method is based on the latest household projections prepared by ONS, with an upward adjustment made in the case of all authorities where the affordability ratio is greater than 4. The 2016-based household projections were published on 20 September 2018 – after the Issues and Options Consultation document was drafted. As a result, the figures set out in paragraph do not reflect the most up-to-date standard method calculations.</p> <p>Bromsgrove District is one of the few local authorities that has bucked the national trend. The housing need associated with the 2016-based household projections is higher than that derived from the 2014-based projections. Applying the methodology currently set out in the NPPF and PPG generates a standard method figure of 412dpa for Bromsgrove District. Based on our recommended Plan period of 2018-2041 (23 years), this results in a total housing need of 9,476 dwellings for Bromsgrove District alone.</p> <p>If this proposed change is brought into effect the adjusted housing need figure for Bromsgrove will be 373dpa between 2018 and 2028. Although lower than the figure identified by the standard methodology using the 2016-based SNHP, it remains slightly above the FOAN for Bromsgrove that informed the current Local Plan requirement. The 2016-based household projections resulted in a reduction in the standard method figures for Birmingham and Redditch (to 3,247dpa and 142dpa respectively). However, the proposed changes to the standard methodology would generate a much higher level of housing need (3,577 and 186dpa respectively). Furthermore, the standard methodology does not consider future changes to economic circumstances, and the PPG recognises that “there will be circumstances where the actual housing need may be higher than the figure identified in the standard methodology” and that “the government is committed to ensuring more homes are built and are supportive of authorities who want to plan for growth”. Taking account of considerations such as growth strategies and planned strategic infrastructure improvements, these authorities may decide to plan for a level of housing that is greater than the standard method figure.</p>	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	94			Nigel Gough Associates	Aniston Ltd	Continuing requirement for Bromsgrove to provide for Birmingham's overspill and therefore further land should be identified in the Green Belt and identified as Areas of Safeguarded land.	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p> <p>The issue of safeguarded land is addressed in Q.SI12.</p>
SI9	95			Nigel Gough Associates	Monksgraston Ltd	4.9.1. There will be a continuing requirement for Bromsgrove to provide for Birmingham 's overspill and therefore further land should be identified in the Green Belt and identified as Areas of Safeguarded Land capable of being released appropriately.	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p> <p>The issue of safeguarded land is addressed in Q.SI12.</p>
SI9	96			Nigel Gough Associates	Mr Stapleton	There will be a continuing requirement for Bromsgrove to provide for Birmingham's overspill and further land should be identified in the Green Belt and as safeguarded land capable of being released appropriately.	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p> <p>The issue of safeguarded land is addressed in Q.SI12.</p>
SI9	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	Will be a continuing requirement for Bromsgrove to provide for Birmingham's overspill and therefore further land should be identified in the Green Belt and identified as areas of safeguarded land.	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p> <p>The issue of safeguarded land is addressed in Q.SI12.</p>
SI9	98	Sally	Oldaker			Yes – make sure a lot of homes are affordable – properly affordable! And build some council houses too.	Noted.
SI9	99	Mark	Dauncy	Pegasus	Gallagher Estates	BDC should identify land to be safeguarded for development. Can be released for development beyond the plan period, or in the event that the Council is unable to demonstrate a 5 year HLS.	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p> <p>The issue of safeguarded land is addressed in Q.SI12.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI9	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	At paragraph 4.20 it is noted that the council refer to 'about' the following number of dwellings. This should be changed to 'at least', particularly as (by the council's own admission) this is 'purely to meet Bromsgrove District's local housing needs'.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. This will inform how the Plan's policies are worded later in this process.
SI9	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	At paragraph 4.20 we note that the council refer to 'about' the following number of dwellings. This should be changed to 'at least', particularly as (by the council's own admission) this is 'purely to meet Bromsgrove District's local housing needs'.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. This will inform how the Plan's policies are worded later in this process.
SI9	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	The review should recognise that two separate housing needs are being addressed through the local plan, firstly Bromsgrove's need and secondly the need emanating from the wider conurbation.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	119	Darren	Oakley	RPS Group	Gleeson	Any housing requirement that is proposed or adopted should be presented as a minimum figure so that needs can be properly addressed through a commitment to significantly boost the supply of housing. Furthermore, the review should also recognise that two separate housing 'needs' are being addressed through the local plan, firstly the need generated within Bromsgrove, and secondly the need emanating from the wider conurbation/cross-boundary growth.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	120	Michael	Davies	Savills	Cala Homes	Produce a Memorandum of Understanding at the earliest opportunity to agree which LPAs will take the housing shortfall and to ascertain how many dwellings each LPA will take.	Noted. This will be produced and will form part of the Council's evidence base to underpin its preferred approach moving forward.
SI9	122	Michael	Davies	Savills	Landowners	We consider that Bromsgrove should continue to work with other LPAs in the Greater Birmingham HMA to determine what the standardised methodology means for the whole of the HMA area in terms of housing need and produce a Memorandum of Understanding at the earliest opportunity to agree which LPAs will take the housing shortfall and to ascertain how many dwellings each LPA will take.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. This will inform how the Plan's policies are worded later in this process.  A MoU or SoCG will be produced and will form part of the Council's evidence base to underpin its preferred approach moving forward.
SI9	123	Michael	Burrows	Savills	Landowners	BDC should continue to work with other Local Planning Authorities in the Greater Birmingham HMA to determine what the standardised methodology means for the whole of the HMA area in terms of housing need and produce Statements of Common Ground at the earliest opportunity, as required by NPPF paragraph 27, to agree which LPAs will take the housing shortfall and to ascertain how many dwellings each LPA will take.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. This will inform how the Plan's policies are worded later in this process.  A MoU or SoCG will be produced and will form part of the Council's evidence base to underpin its preferred approach moving forward.
SI9	124	Robert	Lofthouse	Savills	Taylor Wimpey	We recognise that the District Council should look to significantly boost the supply of housing through the plan making process. The Perryfields development will make a very significant contribution towards the District's supply of housing land.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	134	David	Barnes	Star Planning	Richborough Estates	Further, in translating the housing need into delivering new homes, to be consistent with national policy the Local Plan should include an appropriate flexibility allowance to address allocations situations where some sites may not deliver as the number of new homes originally anticipated within the required timescale. Flexibility of 10-20% in allocations would be appropriate.	Noted. The Council will take full account of the NPPF to ensure that sufficient land for housing is identified.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI9	136	Kathryn	Young	Turley	Land Fund	<p>Given Bromsgrove District's relationship (particularly in terms of labour market) with Birmingham the LPR should identify and allocate an appropriate contribution to the unmet housing needs of the Greater Birmingham HMA. The Issues and Options consultation document and the adopted BDP both acknowledge the Duty to Cooperate; which sets a legal duty on the Council to engage constructively, actively and on an ongoing basis with local planning authorities and other public bodies on planning issues affecting more than one local authority area.</p> <p>The most up-to-date evidence on the housing needs of the HMA comprises the Greater Birmingham HMA Strategic Growth Study (SGS, February 2018). The SGS provides several demographic and economic led projections of housing need, and also applied the standard methodology so can be considered a robust assessment of need which has been assessed consistently across the HMA. The demographic projections in the SGS point towards a housing need of around 255,000 dwellings to 2036 which would support baseline economic growth (para 3.33) (this excludes the agreed contribution towards Coventry and Warwickshire HMA). The standard method figure is 265,000 dwellings to 2036 when "uncapped". Para 3.4 emphasises that the demographic needs should be regarded as a minimum. At the other end of the spectrum, the Economy Plus Scenario generates a need for around 310,000 dwellings to 2036 (para.3.33).</p> <p>The SGS also provides a consistent assessment of housing supply across the HMA. It is apparent that the shortfall would be in the order of 71,000 dwellings to 2036 if the standard method were to be applied and 116,000 for the Economy Plus Scenario. A second position statement was published by the 14 HMA authorities (September 2018) providing an update on supply across the HMA, and was intended to form the basis for potential future statements of common ground for Local Plan Examinations. Table 4 of this Statement sets out that the HMA shortfall reduces to 11,000 to 2031 as a result of increased supply. However, it should be noted that this is on the basis of the SGS' minimum baseline need and does not apply the non-implementation rate which was adopted in the SGS. It is, therefore, a best case position for the HMA as a whole.</p>	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period. This will inform how the Plan's policies are worded later in this process.</p> <p>A MoU or SoCG will be produced and will form part of the Council's evidence base to underpin its preferred approach moving forward.</p>
SI9	137	Matthew	Fox	Turley	Redrow Homes	<p>Given Bromsgrove District's relationship (particularly in terms of labour market) with Birmingham the LPR should identify and allocate an appropriate contribution to the unmet housing needs of the Greater Birmingham HMA. The Issues and Options consultation document and the adopted BDP both acknowledge the Duty to Cooperate; which sets a legal duty on the Council to engage constructively, actively and on an ongoing basis with local planning authorities and other public bodies on planning issues affecting more than one local authority area.</p> <p>The most up-to-date evidence on the housing needs of the HMA comprises the Greater Birmingham HMA Strategic Growth Study (SGS, February 2018). The SGS provides several demographic and economic led projections of housing need, and also applied the standard methodology so can be considered a robust assessment of need which has been assessed consistently across the HMA. The demographic projections in the SGS point towards a housing need of around 255,000 dwellings to 2036 which would support baseline economic growth (para 3.33) (this excludes the agreed contribution towards Coventry and Warwickshire HMA). The standard method figure is 265,000 dwellings to 2036 when "uncapped". Para 3.4 emphasises that the demographic needs should be regarded as a minimum. At the other end of the spectrum, the Economy Plus Scenario generates a need for around 310,000 dwellings to 2036 (para.3.33).</p> <p>The SGS also provides a consistent assessment of housing supply across the HMA. It is apparent that the shortfall would be in the order of 71,000 dwellings to 2036 if the standard method were to be applied and 116,000 for the Economy Plus Scenario. A second position statement was published by the 14 HMA authorities (September 2018) providing an update on supply across the HMA, and was intended to form the basis for potential future statements of common ground for Local Plan Examinations. Table 4 of this Statement sets out that the HMA shortfall reduces to 11,000 to 2031 as a result of increased supply. However, it should be noted that this is on the basis of the SGS' minimum baseline need and does not apply the non-implementation rate which was adopted in the SGS. It is, therefore, a best case position for the HMA as a whole.</p>	<p>Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p> <p>A MoU or SoCG will be produced and will form part of the Council's evidence base to underpin its preferred approach moving forward.</p>
SI9	151	Dawn	Macqueen			<p>There is a need to plan until 2046 and then fill in the framework have had to get their questions SI-1 and SI-2 also refer.</p>	<p>The length of the Plan period will be determined and justified as part of the Council's response to Q.SI4.</p> <p>Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI9	165	Johanna	Wood			The number of dwellings has to be agreed and be part of the plan. There cannot be an open book i.e. option 4	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
SI9	169	Louise	Anderson			OBJECT. The amount of houses in this report is huge. Unless infrastructure addresses this already over populated town will be unsustainable. Driving around town now is a joke, bumper to bumper traffic, nowhere reasonably priced to park and stretched services. 6000 houses is not realistic. The traffic survey appears bias towards the house builders.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.  Infrastructure and its delivery forms an integral part of the plan making process.
SI9	171	Mark	Cooper			Bromsgrove needs to be careful about how much housing development it provides in and around Longbridge Village. This will not be to the benefit of the growth of Bromsgrove and will take jobs and shops out of Bromsgrove as Longbridge continues to grow.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.  Distribution of dwellings will be informed by the Council's principles for development, site selection evidence and SA.
SI9	194	Darren	Oakley	RPS	Clients	Any housing requirement that is proposed or adopted should be presented as a minimum figure so that needs can be properly addressed through a commitment to significantly boost the supply of housing. Furthermore, the review should also recognise that two separate housing 'needs' are being addressed through the Local Plan; firstly, the need generated within Bromsgrove, and secondly the need emanating from the wider conurbation/cross-boundary growth.	Noted. Officers acknowledge that the Standard Methodology needs to be re-run using appropriate household projections and affordability ratios following the advice issued by MHCLG after the close of its recent consultation period.
<b>Q.SI10: Which combination of the above options do you feel are the most appropriate and sustainable to meet the District's future needs and why?</b>							
SI10	1	Tammy	Williams	Alvechurch Parish Council		As the centre for the district for services, residential and businesses, Bromsgrove Town should take the majority of growth: Option3 with some expansion mainly as a result of having some sustainability reasons rather than the isolated dispersal through Option 4 which should concentrate on identified local need through rural exceptions: Option 5 would satisfy strategic numbers whilst addressing duty to cooperate schemes: Option 2 should be restricted to being alongside motorway corridors e.g. warehousing /offices etc. to conserve strategic Green Belt openness; whereas at settlements with existing railway stations parking is usually limited and restricted which again would lead to increase use of motor vehicles and the blocking of local highways.Option 8: This would significantly reduce the strength of the Green Belt in Alvechurch Parish at the Redditch boundary. Option 7: As mentioned in the Hearn report, a new settlement would seriously diminish the openness of the Green Belt in the District, and create major issues to existing local settlements due to the current uncertainty of the economic climate. Option 6: Unless to the West of Redditch other growth areas would be encouraging urban sprawl and settlements to merge into one another whilst lessening the protection afforded to safeguard the countryside.	The comments in relation to the options are noted.
SI10	1	Tammy	Williams	Alvechurch Parish Council		The options in varying combinations that could be specifically identified for business development include: - Option 1-Around Bromsgrove town, though A38 congestion issues will loom large. The M42 part junction 1 within Bromsgrove might have to expand for 4 way operation. - Option 2-Use of current transport corridors/ locations with good transport links.This again points to rail improvements in passenger service connectivity and assessment of additional car parking at stations between Redditch, Alvechurch, Barnt Green as a junction and Longbridge (case here and now for a station transport plan!). A441 improvements at Hopwood and at Bordesley are indicated to support the probably inevitable business site development between junctions 2 and 3 on the M42. - Option 5-Edge of the existing West M Midlands conurbation where it meets Bromsgrove district. - Option 6-Edge of Redditch district without further incursion into current major green belt sites where openness as the primary criterion is especially prized e.g. Bordesley.	Support for Options 1,2,5 and 6 is noted.
SI10	1	Tammy	Williams	Alvechurch Parish Council		Where the aim is the promotion of existing and new rural businesses to include agri -businesses, traditional crafts and leisure pursuits) then Option 3, the larger settlements of the district can be part of development distribution and land use, but on varying scales as not all offer the same features of sustainability.	Support for Option 3 to promote rural businesses is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	1	Tammy	Williams	Alvechurch Parish Council		An exercise of this kind with a land for business focus needs to pair with development choices for best housing allocations given the case for some synchronicity between where people live and their journeys to work.	The comments relating to employment and housing are noted and agreed.
SI10	2	Gill	Lungley	Barnt Green Parish Council		The 3 most appropriate/sustainable options are: Option 8 - reconsider the unconsented allocations on the boundary with Redditch Option 1 - focus development on Bromsgrove town to make it more of a hub with sustainable facilities Option 4 - disperse development around the District, adding new growth to a variety of settlements.	Support for Options 1, 4 and 8 is noted.
SI10	4	Barry	Spence	Bentley Pauncefoot Parish Council		We believe the most appropriate combination of options is Options 1, 3, 4, 5, 8 and 9.	Support for Options 1,3,4,8 & 9.
SI10	5	Kevin	Joynes	Beoley Parish Council		Options 2,3 and 9 are the best options for achieving the desired housing growth. Any development should be in areas with existing housing, rather than new, isolated settlements. Infrastructure to serve these areas is already there (upgrading of infrastructure required in certain places to cope with increased no's of residents)	Support for Options 2,3 and 9 is noted.
SI10	8	Nancy	Bailey	Frankley Parish Council		Garden villages should be considered in the larger settlements such as Wythall, Clent, Alvechurch, Hagley and Barnt Green.	The comments in relation to Garden Villages are noted.
SI10	8	Nancy	Bailey	Frankley Parish Council		Land previously removed from Bromsgrove's Green Belt in Redditch should be fully built out before consideration is given to removing more land. Although a 5 year land supply should be available, recent analysis shows the requirement for housing to be lower than previously anticipated.	Support for Option 8 is noted.
SI10	9	Alexandra	Burke	Hagley Parish Council		Option 1 - Release of land between Bromsgrove and the M42 has scope to deal with transport issues including the relative inaccessibility of the Whitford & Perryfields sites. Option 2 - Release of land near to the Station would meet the aims of Option 1 and would also contribute to meeting the need for housing for those working in Birmingham. Development around transport hubs will only work if the development is within a 5 minute walking isochrone from the station (approx 500 m). Specific comments on local stations: Hagley Station is in an area where highway access is already poor; Barnt Green Station is surrounded by densely developed land; Alvechurch Station is on high ground and would have unacceptable landscape impact; Development nr Wythall Station and Whitlocks End would be in the fragile Green Belt gap between the various settlements in Wythall and in Solihull. Option 3 - It should be sufficient in the short term only to make very modest releases adjoining the large villages (e.g. 50 dwellings with safeguarded land for another 50). Should be limited to local needs and implemented through Neighbourhood Plans and/or a Local Housing Needs Assessment. Cofton Hackett needs to be added to the list of larger villages. Recent development needs to bed in before more is allowed Option 4 - Scope for some expansion of the smaller villages, but needs to be modest and in keeping with local character and needs. Sizes and capacities of the small villages vary considerably:Each village needs to be considered individually in terms of capacity and should be limited to meet local needs. Option 5 - A worrying prospect. Development between Hagley & Pedmore unacceptable as would lead to Hagley coalescing with Stourbridge. Options 6 and 8 - scope for using some land on the edge of Redditch. Site at Oxtalls Farm has been heavily promoted in the past - parts of it could be released. Scope for some further release to the north of Persimmon's Brockhill East site Option 7 - Dependant on the scale of over spill housing from Birmingham and the Black Country. Option 9 - Sites for intensification generally tend to come forward as Windfall sites	The specific comments relating to each growth option are noted, in particular the comments relating to the role that neighbourhood plans can play in meeting local needs.

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SI10	10	Patricia	Dray	Highways England		<p>Our initial analysis has shown that at lower levels of development (6500 dwellings), a critical mass of development is to be preferred. The new settlement option, supported by the spread of development to land located within the walking catchments of the various rail stations situated across Bromsgrove district (e.g. Hagley, Wythall, etc.), would be likely to result in the lowest levels of traffic implications for the SRN. Consequently, a single strategic development site if achievable in the wider planning context is preferred by Highways England. This would allow for a critical mass of development and supporting infrastructure and transport interventions. While the direct transport implications upon the SRN would be significant this would allow funding sources to be concentrated to deliver an effective long term response without spreading such needs across multiple locations which may result in a lower level of return on investment and potentially higher overall costs.</p> <p>The focus on existing large settlements, including Bromsgrove, followed by a focus on Bromsgrove, urban intensification (Bromsgrove and Redditch) and dispersion across a variety of settlements, are the options which generated the highest traffic impacts on the SRN. Some development in the vicinity of Bromsgrove railway station to exploit the upgraded service there would appear a pragmatic policy choice provided that the wider road network implications could be managed.</p> <p>At higher levels of development (12000 new dwellings), the rank of options generating the least impact on the SRN is identical to the one obtained in the analysis of the lower level of development. The options negatively affecting the SRN are also identical, however, the ranking is slightly different, with the focus on the Bromsgrove urban area being the most problematic, followed by the urban intensification option (Bromsgrove and Redditch). Again, a potential development proposal that included some growth in the vicinity of Bromsgrove railway station to exploit the upgraded service there would appear a pragmatic policy choice provided that the wider road network implications could be managed.</p> <p>While Highways England would not automatically object to the least favourable options, they are likely to result in the greatest cumulative traffic impact on the SRN and thus require the greatest level of mitigation to manage the SRN impacts.</p>	Support for a single strategic development site to reduce the impacts of traffic implication on the Strategic Road Network is noted.
SI10	11	Rosamund	Worrall	Historic England		The Plan will need to consider the interrelationship between the historic environment and development distribution and allocating land uses.	The comments in relation to the historic environment are noted.
SI10	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council have the view that using the 2016 figures for projected housing need would reduce the need for greenbelt development.	These comments relating to projected housing need are noted.
SI10	13			Natural England		Natural England has no specific preference. We recommend that this decision is based upon a sound evidence base. This should include environmental evidence including on biodiversity and green infrastructure. We recommend that the council considers the ability of each option to deliver against its revised Strategic Objectives, particularly SO6, SO8 and SO10.	The comments relating to the importance of environmental evidence are noted and agreed.
SI10	16	Rebecca	McLean	Severn Trent		<p>Options 1 and 3 are preferred as these would allow us to focus infrastructure improvements in combined improvement schemes if investment into the sewerage network is required.</p> <p>We have less support for disperse development in smaller settlements (option 4) as it may require a greater number of investment upgrades schemes in areas with small diameter sewers or less available capacity at Sewage Treatment works.</p> <p>Option 7 - new settlements also have less support due to large infrastructure investment required by both Severn Trent and often the developer. If this is chosen we would wish to be consulted at the earliest opportunity to develop a solution.</p> <p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead.</p>	Support for Options 1-3 is noted.
SI10	17	Stuart	Morgans	Sport England		In respect of Strategic Issue 4, Sport England would support those options that would make appropriate provision for community infrastructure (to include built sports facilities and playing fields) to meet the needs of the proposed housing growth.	The comments in relation to a critical mass to provide community infrastructure are noted.
SI10	19	Steven	Bloomfield	Worcestershire Wildlife Trust		A blend of the proposed options will be required at this stage. The background evidence base created as part of the plan process will be fundamental to decisions made and should be brought forward to underpin and assist with options testing, each of the options outlined. It will be essential to determine likely environmental impacts and any GI constraints/opportunities as part of this process.	The comments relating to the requirement for technical evidence and options testing is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	20	P	Harrison	Wythall Parish Council		<p>We consider Option 1 should be the foremost focus for future development because of the public investment that has recently been put into improving the rail link between Bromsgrove station and the West Midlands conurbation. It makes sense to plan for massive housing growth to the East of the town around the station albeit at the expense of the Greenbelt.</p> <p>Option 2 - for growth where there are good transport links is an obvious policy and is supported by the NPPF.</p> <p>Option 3 - should be implemented with caution and the proviso that adequate additional services and infrastructure are put in place in advance of development.</p> <p>Option 4 - limited dispersed development could take place in some locations subject to the provision of additional services and facilities to support the population.</p> <p>Option 5 - focussing growth along the borders with Solihull/Birmingham/Dudley should only be considered after the needs of the conurbation have been identified. If the urban area requires more housing, then it should be built along the common boundaries where existing transport links and social connections are available.</p> <p>Option 6 – development on the edge of Redditch could be considered on land previously allocated for the now unwanted demand from Redditch (see response to Option 8 also).</p> <p>Option 7 – We do not favour a new settlement but I do favour expansion and revitalisation of Portway possibly as a Garden Village in association with employment opportunities at the nearby Oakland site (See response to E3 Option 3). This could involve development within the adjoining Stratford-on-Avon district.</p> <p>Option 8 – Redditch has a lower level of housing need using the new standard methodology and I consider that the existing unconsented allocations should be regarded as allocations to serve Bromsgrove District, thus reducing the need to sacrifice further precious Greenbelt land elsewhere in the district.</p> <p>Option 9 – urban intensification should only be considered if the increased densities can be accommodated such as in brownfield sites and under-used buildings around Bromsgrove town centre.</p>	The comments in relation to the options are noted.
SI10	21	Martin	Dando	Birmingham City Council		<p>At this stage, all options should be investigated to enable the amount of development land identified within the Plan Review to be maximised.</p> <p>When looking into Option 5 (Focus development on the edge of the West Midlands conurbation, along our border with Solihull, Birmingham and Dudley), please ensure that options are explored in conjunction and co-operation with officers from Birmingham City Council.</p>	The comments in relation to a combination of the options are noted.
SI10	22	Carl	Mellor	Black Country Authorities		<p>A combination of all options need to be considered as all have potential to meet future development needs of the District. However, options for housing growth should avoid the 'key and significant' sand and gravel resource areas and silica sand resource areas identified for safeguarding in the emerging Worcestershire Minerals Local Plan.</p> <p>Option 5 – Focus development on the edge of the West Midlands conurbation, along our border with Solihull/Birmingham/Dudley. This Option should only be considered where justified by the conclusions of a detailed greenbelt assessment to determine the most suitable and sustainable locations along the boundary – and only after consultation and co-operation with neighbouring authorities to determine the full implications and infrastructure requirements of any such proposals.</p>	The comments relating to the options are noted and also the potential impacts on sand and gravel resource areas.
SI10	24			Redditch Borough Council		<p>Should sites be proposed adjacent to Redditch Town, RBC requests the opportunity to discuss exiting nearby facilities and services which would be within Redditch Borough and be used by future residents of these sites. Therefore important that RBC as well as service and facility providers within RBC are involved in the site selection, allocation and policy formulation process to ensure a cohesion and integration of any proposed allocation sites with Redditch Town.</p> <p>With the Bromsgrove administrative area, Brockhill provides 600 dwellings for Redditch and the Foxlydiate site provides 2,800 dwellings. All of the 3,400 dwellings are for Redditch's housing need.</p> <p>The numbers within the I&amp;O document use the 2016 based data. The housing need for RBC is unclear and it cannot therefore be assumed that the two cross boundary housing allocation sites are not required for Redditch to meet its housing need. These sites should be retained for Redditch's housing need until 2030 as per the current plan.</p> <p>Redditch will have housing needs beyond 2030 and it is important for the Bromsgrove Plan Review to have regard to this matter.</p> <p>BDC would still need to undertake a Green Belt Assessment and propose suitable and sustainable sites to remove from the Green belt and allocate for development regardless of whether Foxlydiate and Brockhill numbers went towards Bromsgrove's housing needs. Anticipated that this process will identify sites that are more suitable from a sustainability perspective for Bromsgrove's needs than sites contiguous to Redditch Town.</p> <p>RBC is entirely willing to work with BDC to ensure that the Local Plan Review is soundly prepared and provides a co-ordinated approach to growth within Bromsgrove District without compromising the needs and issues for Redditch Borough.</p>	The comments relating to the cross boundary sites are noted and agreed. BDC will continue to work proactively with RBC as a Duty to Co-operate Partner.

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SI10	25	Gary	Palmer	Solihull Metropolitan Borough		It is likely that a combination of several of the 9 options will be required to meet the development needs of the Borough and potential contribution to the wider HMA development needs. With regards to Option 5 (Focus development on the edge of the West Midlands conurbation, along our border with Solihull/Birmingham/Dudley), it will be crucial to work closely with the neighbouring authorities to ensure that an overall sustainable pattern of development is achieved; and Solihull Council is prepared to do so.	The comments in relation to a combination of the options are noted.
SI10	27			Stratford On Avon District Council		Option 2 and potentially Option 7 may have significant cross boundary implications if locations along the A435 were identified and SDC would expect to be involved with discussions at the earliest opportunity. SDC also re-emphasises the constraint of the A435 through Mappleborough Green and Studley (including the Studley Air Quality Management Area) to the south of Bromsgrove District which would likely be implicated by any proposals for additional significant development along the A435 corridor within Bromsgrove District itself.	The comments relating to the cross boundary implications of Options 2 and 7 are noted.
SI10	28	Emily	Barker	Worcestershire County Council		Combination of existing settlements to maintain, enhance and support existing infrastructure together with new development. Any new settlements of 500 dwellings or above may require new first schools and expansions at existing schools to support older age groups. Larger developments of 3,000 dwellings may require multiple new schools across all ages. Consideration should be given to potential impacts of growth on the AQMA in Worcester Road, options should seek to avoid increased traffic in the town centre and the congested corridors in the south of the town. Options that disperse growth, such as Option 4, may reduce the potential to deliver strategic infrastructure. The ability of the road network in Bromsgrove to accommodate further growth is severely constrained. Schemes to support the existing network are outlined in LTP4. Based on existing data: 1) The ability of the road network in Bromsgrove to accommodate further growth is constrained and proposals which involve urban intensification need to take this into account. 2) Proposals should be located where they can take advantage of either existing or new rail stations and where they can promote modal shift. 3) New development which is solely reliant on roads should be discouraged as this will add to congestion problems. 4) Most of the existing schools within the District have little or no capacity or desire to expand. Significant new development will therefore require new primary/middle and high schools. Costs of these schools need to be factored into the development proposals. Incremental development within existing settlements may be difficult to respond to if schools do not have spare places or the land/desire to expand. Where developments will use existing schools it is essential that safe walking routes from the development are provided. 4) Allocations which generate sufficient pupils for a whole year group are preferred (30 pupils/1,000 homes) are preferred to those which generate the need for half a year group. Targeting growth along the road network could potentially give access to funding.	The comments relating to potential impacts of growth on the Worcester Road AQMA are noted.
SI10	29	Daniel	Atiyah	Wyre Forest District Council		Wyre Forest welcomes the different options for housing development in the Issues and Options document as shown in strategic issue 4. The council accepts that the Government's housing methodology will require allocation of housing sites in Bromsgrove district and that some of these sites could put pressure on existing infrastructure that is important to Wyre Forest, such as additional new dwellings at Hagley. It will be important that Worcestershire County Council works with Bromsgrove District Council on improvements to highways and other infrastructure in order to support housing growth in both Wyre Forest and Bromsgrove, and that these improvements should be brought forward in a timely way, before significant development has been undertaken.	The comments relating to the potential impact on highway infrastructure are noted and agreed.
SI10	30	Andrew	Peacock	Barnt Green Surgery		I would support option 1 and 8. I feel that widely distributed/dispersed development runs the risk of no attaching the appropriate community support. Both Redditch and Bromsgrove need investment in redevelopment and a structured approach to housing will help to this end. I strongly disagree with the city spread of Birmingham south into the North Worcestershire green belt.	Support for Options 1 and 8 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	33	Steve	Colella	District Councillor		<p>Bromsgrove is still going through a period of significant development across the district. This development is currently focused on 5 larger settlements, already suffering from capacity and overdevelopment issues. For example Hagley has seen a rise of c20% additional houses and a similar rise in population over a relatively short three year period.</p> <p>The pressure of the schools, doctors, traffic and travel is significant. Further development on the shoulder of this development will be catastrophic for these settlements and would prove to be unsustainable in the eyes of a Planning Inspector. There is the continual drip-drip impact from small scale sites, all adding to overdevelopment yet not contributing to s106/278 monies.</p> <p>Bromsgrove's objectively assessed housing growth should be dispersed across the district; targeting land identified through member consultation, Neighbourhood plans, middle to small parished areas (with or without Neighbourhood plan support). Local housing should be based on 'locally' assessed housing needs at a scale in keeping with its form and character. Bromsgrove Town Centre has seen a significant investment in the rail network and therefore should be considered for both significant housing and employment development.</p> <p>The more positive and sustainable approach should be to spread the growth across the district on areas that have avoided development to date as opposed to concentrating further development on already stretched communities. Larger settlements that have consistently taken large housing growth and who are undergoing more current development should be given breathing space to rebalance the amenities and infrastructure. Therefore, unless through a neighbourhood plan it expresses a need for housing to meet local housing needs further development should be avoided.</p>	The comments in relation to the Options and the potential impacts on Hagley are noted.
SI10	34	Sue	Baxter			<p>I would favour:</p> <p>Option 1 for major development because of the public investment that has recently been put into improving the rail link between Bromsgrove station and the West Midlands conurbation.</p> <p>Option 4 has some merit as small rural settlements do need some growth to allow those communities to prosper and not stagnate, especially where this has been highlighted within neighbourhood plans.</p> <p>Option 8 I consider that the existing unconsented allocations should be regarded as allocations to serve Bromsgrove District, thus reducing the need to sacrifice further precious Greenbelt land elsewhere in the district.</p>	Support for Options 1,4 and 8 .
SI10	35	Peter	King	Campaign to Protect Rural England		The latest housing methodology tends to increase Bromsgrove's target and decrease Redditch's. This means that the land taken out of the Green Belt to meet Redditch's supposed needs can be recovered as a contribution to Bromsgrove's needs.	The comments relating to Redditch's housing needs are noted.
SI10	35	Peter	King	Campaign to Protect Rural England		<p>Preferences:</p> <ul style="list-style-type: none"> <li>•We favour option 8 as the best short-term solution. There may be scope for extending sites further between A441 and A448 (a version of Option 6).</li> <li>•To the extent that is insufficient, option 1 is attractive: land around Bromsgrove Station is a transport-sustainable location for Birmingham commuters, provided there is a good enough train service.</li> <li>•The area enclosed by the town, M42, and Birmingham and Stourbridge Roads (see link roads under SI.6) is an appropriate location for an urban extension for Bromsgrove.</li> <li>•It is not viable for other settlements not to grow to some extent. Accordingly, modest growth for both large and small villages should be allowed, by enabling NPs (where they are being developed) or the new BDP (elsewhere) to adjust the boundary of the Green Belt adjoining the village or the village envelope as the case may be.</li> </ul>	Support for Options 1 and 8 is noted.
SI10	35	Peter	King	Campaign to Protect Rural England		<p>Rejected options:</p> <ul style="list-style-type: none"> <li>•Intensification should be encouraged but such windfalls are unlikely to generate the housing sites needed. However there is scope for allocating housing sites on brownfield land on the edge of Bromsgrove Town Centre.</li> <li>•We see the new settlement options of SGS as an unsatisfactory option, because the proposed locations are already large villages, with some existing ribbon development in the area between them. The result of creating a new settlement on the Birmingham-Redditch rail corridor would be continuous development joining Cofton Hackett (on the edge of Birmingham) to Barnt Green to Alvechurch to Bordesley (ribbon development along A441) to Redditch. This is contrary to policy existing since the Prevention of Ribbon Development Act of the 1930s.</li> <li>•The Transport Corridors option is taken account of in our selection above.</li> <li>•Development along the edges of the conurbation is liable to be at the expense of strategic Green Belt gaps, keeping settlements apart, which we consider should be protected at all costs.</li> </ul>	The comments in relation to the options are noted.



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SI10	35	Peter	King	Campaign to Protect Rural England		This question assumes the need for additional housing beyond Option 1 on SI 8 which is not the case if one excludes housing to meet need in Redditch as we propose. That being the case the need for a Green Belt Review is open to question. Even if that were not the case, the answer to this question would depend on what level of housing could not be accommodated on existing or unidentified urban sites. Having said that we support urban intensification, where it does not compromise the heritage or environmental assets of Bromsgrove. We also supported some specific allocations on the edge of Redditch at the previous inquiry which were not included in the plan. The approach to where any further additional housing should go needs to be determined by Green Belt purposes, landscape and sustainability considerations, in particular the impact on transport choices and distances.	Support for Options 9 and 8 is noted.
SI10	36	Conrad	Palmer	Fairfield Village community Association		A blended approach of all 9 options, to create sustainable communities, utilise existing infrastructure and minimise negative social and environmental impact.	The comments in relation to a combination of the options are noted.
SI10	38	Sue	Green	Home Builders Federation		A combination of all nine Options for the broad distribution of development and allocating land uses is considered the most appropriate and sustainable approach to meeting the District's future needs.	Support for a combination of all the options is noted.
SI10	39	Andrew	Carter	Homes England		At this stage of the Plan's evolution it is difficult to completely rule out any of the options. However an approach that focusses the majority of the development towards the primary settlement of Bromsgrove would make the greatest sustainable sense from the perspective of place making and shaping. New growth could then be directly responsible for the infrastructure requirements to deliver that growth in a co-ordinated forward funding mechanism.	Support for Option 1 is noted.
SI10	41	Helen	Davies	Transport for West Midlands		TfWM appreciate the scale of growth which is happening across both the metropolitan area as well as the wider region. In the case of Bromsgrove, we feel the increased scale of new development will significantly impact on the wider journey to work area. A joined-up, cross-boundary approach will therefore be vital, to ensure transport demand can be fully met within the metropolitan area. We further take the approach that the location of new development should seek to make best use of existing transport assets and then consider the need for additional capacity, over and beyond this. New development must be well designed to accommodate the needs of all transport modes and must be fully integrated with existing transport networks. Transport improvements will allow suitable sites to be developed and enable new travel demand to be met by sustainable forms of travel. Likewise, significant development should be focused on locations where there is easy access to high quality public transport, or the opportunity to provide it, and residential development should be in neighbourhoods where people can access local services on foot. Similarly, increasing development density close to transport hubs such as railway stations and high frequency bus routes is also promoted by TfWM. The new Bromsgrove rail station in particular is suitable for rail heading (a practice of travelling further to reach a rail service) due to its increased car park capacity. Therefore a number of planning options, as identified on page 23 could be explored. Finally, transport schemes should consider the requirements of an increased elderly population as part of population changes and the significant growth in the number of young people in the West Midlands region.	Support for a cross boundary approach to transport demand is noted and agreed.
SI10	42			Wythall Residents Association		Option 5 - focussing growth along the borders with Solihull/Birmingham/Dudley should only be considered after the needs of the conurbation have been identified. If the urban area requires more housing, then it should be built along the common boundaries where existing transport links and social connections are available.	The comments relating to Option 5 are noted.
SI10	42			Wythall Residents Association		Option 6 – development on the edge of Redditch could be considered on land previously allocated for the now unwanted demand from Redditch (see response to Option 8 also).	Support for Option 6 is noted.
SI10	42			Wythall Residents Association		Option 7 – We do not favour a new settlement but I do favour expansion and revitalisation of Portway possibly as a Garden Village in association with employment opportunities at the nearby Oakland site (See response to E3 Option 3). This could involve development within the adjoining Stratford-on-Avon district.	The comments in relation to expansion & revitalisation of Portway in association with employment opportunities.
SI10	42			Wythall Residents Association		Option 8 – Redditch has a lower level of housing need using the new standard methodology and I consider that the existing unconsented allocations should be regarded as allocations to serve Bromsgrove District, thus reducing the need to sacrifice further precious Greenbelt land elsewhere in the district.	Support for Option 8 is noted.
SI10	42			Wythall Residents Association		Option 9 – urban intensification should only be considered if the increased densities can be accommodated such as in brownfield sites and under-used buildings around Bromsgrove town centre.	The comments in relation to Option 9 are noted.
SI10	42			Wythall Residents Association		Option 4 - limited dispersed development could take place in some locations subject to the provision of additional services and facilities to support the population.	Support for Option 4 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	42			Wythall Residents Association		Option 2 - for growth where there are good transport links is an obvious policy and is supported by the NPPF.	Support for Option 2 is noted.
SI10	42			Wythall Residents Association		Option 3 - should be implemented with caution and the proviso that adequate additional services and infrastructure are put in place in advance of development.	Comments in relation to Option 3 are noted.
SI10	42			Wythall Residents Association		Option 1 should be the foremost focus for future development because of the public investment that has recently been put into improving the rail link between Bromsgrove station and the West Midlands conurbation. It makes sense to plan for massive housing growth to the East of the town around the station albeit at the expense of the Greenbelt whilst reducing the necessity to develop on the Green Belt in areas such as Wythall.	Support for Option 1 is noted.
SI10	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	<p>Considered prudent that a combination of options are progressed. Option 5 is supported this is considered to provide the most suitable and sustainable option for delivering unmet need arising from the GBHMA by delivering housing closest to where it is required. This Strategy would follow the guidance at paragraph 8.21 of the adopted District Plan.</p> <p>Considered that the sites should also be focussed on transport corridors and/or locations with good transport links. Would enable such sites to follow the previous development patter, forming a logical extension to existing settlements and provide access to, and integrate with, existing communities.</p>	Support for Option 5 is noted.
SI10	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	<p>A mix of Options 1-3 are seen as the most sustainable and will allow much needed housing to be brought forwards quickly and with links to existing services and sustainable transport infrastructure. Options 1-3 have the scope to provide extensive land to meet the Council's housing need and that of the wider region.</p> <p>Option 4 (dispersed development), would be a less sustainable, and therefore less favourable option to meet the aims of the Council and the wider HMA. Growth in in the smaller settlements will be less sustainable in nature, will require more infrastructure works (which may not be provided for by smaller sites) and will require greater transport options. The links to the major conurbations may also be weaker in these locations and will not allow for easy travel into the regional centres.</p> <p>Option 7 (new settlement) would fail to deliver the required housing in the required timeframe. While the NPPF states that new settlements can be used to achieve the supply of large numbers of new homes (Paragraph 72), the Council should make a realistic assessment of likely rates of delivery. The creation of new settlements will take significant time to come forward and for the unmet housing need to be met. There are also questions of their sustainability given new transport links will need creating. This option should not be advanced.</p> <p>With regards to option 9 (urban intensification) it is considered that there are uncertainties around the contribution this could make to the housing need in the absence of additional information on the capacity of settlements. Concern about the impact on the existing character of the settlements, if ill-designed high-density development is permitted without full consideration of its impact on the character of the area and the amenity of existing residents. This option would not, meet the required aims of the Plan review.</p>	Support for Options 1,2 & 3 is noted.
SI10	46	Ian	Mercer	Bruton Knowles	Church of England	A combination of all nine options would be most appropriate and best meet the local and regional housing needs	The comments in relation to a combination of the options are noted.
SI10	47	Michael	Jones	Caddick Land		Given the need to provide for a proportion of the housing needs for Birmingham, the primary focus for growth should be sustainable locations on the boundary with Birmingham/Solihull. (Option 5). Existing settlements within the District which are close to the boundary with the conurbation such as Majors Green and Wythall present the opportunity to locate sustainable extensions to ensure that new residents can access the existing services whilst being located near to the Birmingham boundary to best help meet the objective of accommodating a proportion of the City's unmet housing needs.	Support for Option 5 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	48	Grace	Allen	CBRE	Arden Park Properties	<p>One single approach to the distribution of development would not be appropriate for a number of reasons. A combination of Options 2, 3 and 4 would allow for the most sustainable approach to meeting the District's future housing needs.</p> <p>Option 2: Bromsgrove has a number of settlements which could be capable of accommodating growth by virtue of its accessibility, such as Barnt Green which is in close proximity to Junction 2 of the M42 and Barnt Green Rail station, in addition to bus services. By ensuring that development is located in key transport corridors (or locations), Option 2 ensures that future developments are as sustainable as possible in terms of proximity to a variety of transport modes including sustainable transport options.</p> <p>Option 3: Focusing development around existing settlements suggests that existing facilities, services and infrastructure may be relied upon. Whilst this would be beneficial to some extent, it must be acknowledged that proposed development must also consider the impact on the existing services and assess the ability to provide additional infrastructure if required. Barnt Green is identified as a Large Settlement and therefore would be appropriate for development growth under this option.</p> <p>Option 4: As alluded to above, focusing development on specific areas may only be beneficial to some extent, therefore distributing development in other settlements will assist in delivering housing and employment throughout the plan period (e.g. a combination of small and large sites will likely be delivered in the short- to long-term respectively) and therefore maintaining supply over the Plan period.</p> <p>A combination of development of different sizes and in different locations, proportionate to the existing settlements size, will assist in ensuring the appropriate infrastructure and services is available to the existing and future population.</p>	Support for Options 2,3 and 4 is noted.
SI10	48	Grace	Allen	CBRE	Arden Park Properties	<p>It is also noted that Option 7 suggests planning for a new settlement, as recommended as an 'Area for Search' for Bromsgrove in the GBBCHMA SGS. Whilst we consider that this option should be explored in line with the study recommendations, it would unlikely provide a supply of housing within the plan period to 2036 due to the complexities in developing a new settlement. It may be appropriate to safeguard such land in the future, if likely to be required to meet future needs.</p>	The comments relating to safeguarding of land to meet future needs under Option 7 are noted.
SI10	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	<p>It is our view that the broad option for development distribution and allocation land uses should be a combination of options 3 and 4 for the following reasons;</p> <p>Option 3 – The adopted plan has already identified growth within large settlements at Alvechurch, Barnt Green, Catshill, Hagley, Wythall and Frankley. These sites provide land for 1022 new dwellings. At the time of adoption 938 dwellings had received permission across these sites, leaving only 84 to be completed. It would seem therefore that this option was successful previously and is an option that should be considered for further. Large settlements that were not considered or allocated growth in the existing plan that are equally sustainable and provide excellent opportunities for growth could be considered for growth.</p> <p>Option 4 – This option should be investigated further. Smaller settlements were not provided with allocations in the adopted plan. It was intended for these sites to come forward through Neighbourhood Plans. As explained earlier, this has not been possible overall as most of the District is located within the Green Belt. Many of the smaller settlements possess various levels of services and access to public transport and links to major transport. The provision of development of an appropriate and proportionate scale to some of these settlements would constitute sustainable development and should be given proper consideration. Many local plans across the country rely on this option to distribute even amounts of growth area.</p>	Support for a combination of Options 3 and 4 is noted.
SI10	50	Debbie	Farrington	Cerda Planning	The Trustees	<p>It is our view that the broad option for development distribution and allocation of land uses should be a combination of options 2, 3, 4 and 6. [See reasons given in representation].</p>	Support for Options 2,3,4 & 6 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>Given the nature of Bromsgrove District, specifically as a “Green Belt Authority,” the District Council is significantly constrained as to the extent of development can be allocated for and how it is able to manage growth practically over the Plan period.</p> <p>Options 1 and 9, which look either focus development at Bromsgrove town itself and to promote increase in urban densities, would be inappropriate to consider alone. Growth focussed at Bromsgrove alone (as perpetuated in Option 1) will inappropriately produce an unbalanced approach to development, which would starve other areas of their requisite development and would overly apply pressures to the town in terms of capacity and infrastructure requirements. Urban intensification as advanced in Option 9, will inappropriately promote development within built up areas such as Bromsgrove, that would deviate from the vernacular norm of the Bromsgrove, which is characterised as a market town rather than a large, dense urban area. This would result in incongruous development that would be harmful to the town itself, which is regarded as a more rural alternative to the very urban feel as in the West Midlands Conurbation to the north of the town.</p> <p>It is advanced that whilst Option 4 demonstrates a more reflexive approach in locating development within the District, ensuring that a more evenly dispersed strategy is implemented, providing avenues of growth to settlements which require such development to support infrastructure investment and provision as well bolster capacity dependent services. It is Claremont’s view that a combination of all Options should be considered to ensure that the most reflexive strategy possible is adopted and as such all potential directions and avenues of growth can be explored and fully realised. Due consideration however of Options 5 and 4 should be facilitated through the emerging Local Plan. This will contribute towards maximising the existing functional, social and economic ties of Bromsgrove with the Greater Birmingham conurbation and as such take advantage of opportunities to develop sites along the fringes with the conurbation which can demonstrate sensible and suitable Green Belt release, as well as socially, economically and environmentally sustainable opportunities to secure development. Option 4 also provides the opportunity to secure limited development potential in villages that can demonstrate growth that both supports local services, cater for local need but also contribute towards the wider, strategic development requirement as identified through the emerging Local Plan.</p>	Support and comments relating to options 4 and 5 is noted.
SI10	52	Tom	Ryan	Claremont Planning	Bellway Homes	<p>The reviewed NPPF provides new emphasis on the utilisation of land and through this, the increase of urban densities and focus towards growth around transport nodes and hubs has provided a new influence on development within existing built up areas. Whilst this will provide a new avenue for growth nationally, it is arguable as to how appropriate this approach is within the District and in particular at Bromsgrove itself. However, Bromsgrove, as the primate settlement of the District, demonstrates the most sustainable and suitable location for development.</p> <p>It is advanced however that careful consideration should be attributed to this Option and as to whether it should inform the Spatial Strategy. Focussing development at Bromsgrove demonstrates sustainable development and is a suitable location to accommodate further growth for the District. However, if this were to result in significant development, this will ultimately apply substantial pressures on existing infrastructure in the town. This should be duly taken into account when exploring this Option and it could be prudent to explore additional Options as a combination of approaches to ensure an effective overall policy that does not cause detrimental impacts to any one location within the District through the emerging Local Plan.</p>	Support for development to be concentrated around Bromsgrove is noted as are the concerns about pressures on existing infrastructure in the town.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	<p>Our view that all Options should be considered to ensure that the most reflexive strategy possible is adopted and as such all potential directions and avenues of growth can be explored and fully realised.</p> <p>Options 1 and 9, which look either focus development at Bromsgrove town itself and to promote increase in urban densities, would be inappropriate to consider alone. Growth focussed at Bromsgrove alone (Option 1) will inappropriately produce an unbalanced approach to development, which would starve other areas of their requisite development and would overly apply pressures to the town in terms of capacity and infrastructure requirements. Urban intensification (Option 9), will inappropriately promote development within built up areas such as Bromsgrove, that would deviate from the vernacular norm of the Bromsgrove, which is characterised as a market town rather than a large, dense urban area. This would result in incongruous development that would be harmful to the town itself.</p> <p>Option 4 demonstrates a more reflexive approach in locating development within the District, ensuring that a more evenly dispersed strategy is implemented, providing avenues of growth to settlements which require such development to support infrastructure investment and provision as well bolster capacity dependent services. Moreover, a spatially diverse strategy ensures that no one particular location has inappropriate focus for growth, which can result in avoidable pressures on existing infrastructure and detrimental impacts on the cohesion and structure of existing communities.</p> <p>Options 5 and 4 should be facilitated through the emerging Local Plan. This will contribute towards maximising the existing functional, social and economic ties of Bromsgrove with the Greater Birmingham conurbation and as such take advantage of opportunities to develop sites along the fringes with the conurbation which can demonstrate sensible and suitable Green Belt release, as well as socially, economically and environmentally sustainable opportunities to secure development. Option 4 also provides the opportunity to secure limited development potential in villages that can demonstrate growth that both supports local services, cater for local need but also contribute towards the wider, strategic development requirement as identified through the emerging Local Plan.</p>	Support for the role of all the options in meeting the District's development needs is noted.
SI10	54	Katherine	Else	Claremont Planning	Miller Homes	Option 6 of Strategic Issue 4 should be attributed significant weight in terms as a consideration to form part of the new Local Plan. Whilst in the context of the standardised methodology which indicates a drop in the need at Redditch, no land should be removed from these existing allocations, given the existing pressures arising within Bromsgrove and the wider region.	Support for Option 6 is noted.
SI10	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	The Local Plan will seek to test a number of distribution options to assist in identifying the most appropriate sustainable development strategy. Options 1 to 9 represent a sensible and inclusive range of options, though it is inevitable that a combination of options may be required to meet the district needs and aspirations. Inclusion of option 5, focusing development on the edge of the West Midlands Conurbation is supported, recognising that this requires effective and ongoing co-operation with neighbouring authorities.	Support for the role that all the growth options can play in providing new development is noted.
SI10	57	Karin	Hartley	Delta Planning	Bloor Homes Western	We consider that development should be focused in the most sustainable locations, and in this regard the first priority should be Bromsgrove town (Option 1), areas at the edge of the West Midland's conurbation (Option 5), the edge of Redditch (Option 6) and sites along transport corridors and/or locations with good transport links (Option 2). Whilst the Local Plan should firstly seek to allocate suitable sites for development within these locations, future housing growth should also be directed to the larger settlements within the District (Option 3) including Alvechurch.	Support for options 1, 5, 6 and 2 & 3 are noted.
SI10	58	Karin	Hartley	Delta Planning	Bloor Homes Western & Maximus	We consider that development should be focused in the most sustainable locations, which in our view includes Bromsgrove town (Option 1) and, given the District's proximity to near-by towns and employment locations, also includes areas at the edge of the West Midland's conurbation (Option 5), the edge of Redditch (Option 6) and sites along transport corridors and/or locations with good transport links (Option 2). The Local Plan should seek to allocate suitable sites for development within these locations before considering focusing development in the other settlements within the District (Option 3), dispersing growth to the rural areas (Option 4) or promoting a new settlement (Option 7). Existing allocations (Option 8) and urban intensification (Option 9) will also play a role, albeit a more limited one, in meeting Bromsgrove District's housing needs.	The comments in relation to all the options are noted.
SI10	60	Sara	Jones	Delta Planning	Moundsley Healthcare	Key concern is to ensure that the Bromsgrove Local Plan makes sufficient provision to meet local housing needs. We consider that the land adjacent to the existing Care Village provides an excellent opportunity to provide additional care facilities or new homes that could address wider housing needs.	These comments are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	Options 2 and 5 are the more favourable options. These would ensure that development is located in sustainable locations that would benefit from excellent transport links and will benefit from a plethora of services and facilities. Providing residential development in areas closer to job opportunities is desirable, this would help to reduce the travel distance of commuting traffic. Agree and support the Council's comments in para 4.23 that identifies that there will be the requirement for Green Belt releases for any potential options for the direction of growth.	Support for Options 2 and 5 are noted.
SI10	63	Fiona	Lee-McQueen	Framptons	Bellway Homes	It is considered that a strategy consistent with the adopted Local Plan should be carried forward in to the Plan Review with a mixture of Option 3 'Focus Development on the Large Settlements, as identified in the existing BDP' and Option 5 'Focus Development on the edge of the West Midland conurbation, along our border with Solihull/Birmingham/Dudley', albeit this should extend to the vicinity (rather than the edge) where there are good public transport connections into the conurbation. Therefore, land at Wythall between Lea Green Lane and Alcester Road would be considered in the context of focusing development in large settlement which includes Wythall (including Hollywood, Drakes Cross and Major's Green) in a manner consistent with the purposes of the West Midlands Green Belt.	Support for Options 3 and 5 is noted.
SI10	64	Peter	Frampton	Framptons	Mr J Rowlesge	Option 3 and Option 6.	Support for Options 3 and 6 is noted.
SI10	65	Louise	Steele	Framptons	Summix Ltd	It is considered that a strategy consistent with the adopted Local Plan should be carried forward in to the Plan Review with Option 5 'Focus Development on the edge of Redditch'.  2.14Although option 8 refers to the standardised local housing need methodology calculates a lower level of housing need for Redditch, it is noted that the interpretation of the standard methodology cannot be continued until the Government published updated guidance on the matter. The consultation therefore proposes changes to the standard method to ensure consistency with the objective of building more homes, whilst providing the stability communities need.	Support for Option 5 is noted.
SI10	68	Nicole	Penfold	Gladmans		A combination of the options is the best approach. The key to increased housing supply is the number of sales outlets, maximum delivery is achieved because the widest range of products and locations are available to meet the widest possible range of demand.	Comments are noted.
SI10	69	Latisha	Dhir	GVA	St Phillips	Support Options 1,2, 3 , 5 and 6 for development distribution and allocating land within the Plan Review. Contended that a combination of these options will be the most appropriate strategy to deliver the District's (and wider HMAs) need over the plan period, and that these options are in line with the conclusions of the Council's SA. Consideration should be given to the Settlement Hierarchy detailed in Policy BDP2 of the extant Local Plan to ensure that development takes place in the most sustainable locations.	Support for Options 1,2,3,5 & 6 is noted.
SI10	69	Latisha	Dhir	GVA	St Phillips	In the context of BDC it would seem illogical to adopt the 2014 ONS data, given that this would result in lower levels of housing growth. It will also be critical that the Council meets a proportion of wider unmet need within the HMA to ensure the plan is DTC compliant.	The comments in relation to housing need are noted.
SI10	72	Stephen	Peters			It makes sense to plan for massive housing growth to the East of the town around the station albeit at the expense of the Greenbelt. Option 2 - for growth where there are good transport links is an obvious policy and is supported by the NPPF. Option 3 - should be implemented with caution and the proviso that adequate additional services and infrastructure are put in place in advance of development. Option 4 - limited dispersed development could take place in some locations subject to the provision of additional services and facilities to support the population. Option 5 - focussing growth along the borders with Solihull/Birmingham/Dudley should only be considered after the needs of the conurbation have been identified. If the urban area requires more housing, then it should be built along the common boundaries where existing transport links and social connections are available. Option 6 – development on the edge of Redditch could be considered on land previously allocated for the now unwanted demand from Redditch (see response to Option 8 also). Option 7 – I do not favour a new settlement but I do favour expansion and revitalisation of Portway possibly as a Garden Village in association with employment opportunities at the nearby Oakland site (See response to E3 Option 3). This could involve development within the adjoining Stratford-on-Avon district. Option 8 – Redditch has a lower level of housing need using the new standard methodology and I consider that the existing unconsented allocations should be regarded as allocations to serve Bromsgrove District, thus reducing the need to sacrifice further precious Greenbelt land elsewhere in the district. Option 9 – urban intensification should only be considered if the increased densities can be accommodated such as in brownfield sites and under-used buildings around Bromsgrove town centre.	The comments in relation to all of the growth options are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	75	Rachel	Mythen	GVA	Taylor Wimpey	<p>Support Options 2, 3 and 5 and 6 for development distribution and allocating land within the Plan Review. It is contended that a combination of these options will be the most appropriate strategy to deliver the District's (and wider HMA's) need over the plan period Notwithstanding this, consideration should be given to the Settlement Hierarchy detailed in Policy BDP 2 of the extant Local Plan, to ensure that development takes place in the most sustainable locations.</p> <p>Option 2 - Supported in principle. Focuses development on sites located on transport corridors or those sites located in close proximity to transport links, thereby providing good accessibility to the primary road network, rail and other sustainable modes of transport. This will ensure road traffic congestion is reduced within the District.</p> <p>Option 3 - Supported in principle. This option would combine infilling and urban extensions to the Settlements, but are likely to be on a smaller scale than Option 1. The amount of development which could be attributed to the settlements would need to take account of their current settlement size, existing facilities and whether there is an opportunity to increase services and facilities, meaning that the levels of distribution may not be same for all settlements.</p> <p>Option 4 - Support this option, however, local assessment of capacity would be required, with specific regard to existing amenities and facilities within such settlement. The outcome of such assessments would determine the scale of propositions, taking account of the size of the existing developed area.</p> <p>Option 5 - support the principles of this option, insomuch that the sites in close proximity to the West Midlands will need to support the proportion of cross-boundary housing need arising from shortfalls in Birmingham and within the Black Country Authorities, under the Duty to Cooperate.</p> <p>Option 6 - support this Option in principle. Allocating sites in close proximity to the urban area from which they are seeking to address a wider shortfall provides a strong connectivity to the origin of housing need.</p> <p>Option 7 - It is contended that this option would delay the delivery of housing to the later stages of the plan period, due to the complexities and timeframes associated with large-scale planning applications, together with the delivery of the infrastructure needed including highways, services and utilities.</p> <p>Option 9 - The adoption of Option 9 and the increased densities and urban intensification proposed will not be in line with the Council's ambition to preserve and enhance the character.</p>	Support for options 2, 3, 5 and 6 is noted as a combination of options for locating new growth. The comments relating to the Settlement Hierarchy are noted and agreed.
SI10	76	Emily	Vyse	GVA	University of Birmingham	<p>The spatial strategy defined within the Plan should be one that enables the Council to satisfy its obligations in respect of growth in the most appropriate and sustainable way. It will be important when assessing its options to ensure that its decision-making is informed by a Sustainability Appraisal that is sophisticated enough to properly compare the sustainability credentials of different locations for and patterns of growth. On the face of it, the most sustainable way of accommodating both the District's housing needs and the unmet needs arising in the conurbation and elsewhere would be via a combination of Options 1, 5 and 9. However, it may be that when properly examined / tested, the Council finds that land on the edge of Bromsgrove is actually no more sustainable a location for development than locations on the edges of other large settlements in the District or along transport corridors. In those circumstances, the Council may need to look to Options 2 and 3 also. We would not support Option 7 which will almost certainly not meet housing needs in the short – medium term.</p> <p>Option 5 will be critical to the Council satisfying unmet needs in a sustainable way – that is in locations that are as close as possible to where the need arises. If unmet needs are to be addressed elsewhere in the District, there is a significant risk that this will exacerbate unsustainable travel patterns and harm communities.</p>	Support for a combination of options 1,5 and 9 is noted and the comments in relation to Options 2 and 3.
SI10	78	Sean	Rooney	Harris Lamb	Barratt Homes	<p>All 9 of the options outlined present appropriate and sustainable means of meeting the districts future needs. Options 2,3 &amp; 4 which seek to focus new development on transport corridors; large settlements and dispersing development around the district according to capacity. In this context Barrett Homes Land East of Birmingham Road, Alvechurch is ideally located at the edge of the large settlement of Alvechurch. A promotional document for the site has been prepared.</p>	Support for Options 2,3 & 4 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	79	Shamim	Brown			<p>Option 1 - some focus on Bromsgrove town will be needed particularly low-cost housing to encourage key workers to settle close to work locations.</p> <p>Option 2 - a suggestion to focus on transport corridors is OK but I think maybe an effort should be made to encourage use of public transport. So, development near railway stations and permanent bus routes etc. is preferred.</p> <p>Option 3 - I am not particularly in favour of a focus on larger settlements although as stated I suggest a focus on affordable housing in Bromsgrove city Centre is desirable. Rather I think it will be a good idea to spread the development across the district. I think any individual development over 3 hectares would be too big and risks losing rural character.</p> <p>Option 4 - I agree with dispersing development around the district by adding to the existing settlements in sympathetic developments</p> <p>Option 5 - I do not agree that the district should be particularly developed on the edge of the Birmingham Solihull or Dudley conurbations as there is a risk of merging and loss of identity.</p> <p>Option 6 - I do not think any further development on the edge of Redditch is needed</p> <p>Option 7 - I would be against the creation of a new town</p> <p>Option 8 - I do not see any merit in reconsidering unconsented allocations on the boundary with Redditch borough</p> <p>Option 9 - I think apart from Bromsgrove city centre, urban intensification is a bad idea as it will lead to a loss of rural character</p>	Support for Options 1, 2 & 4 is noted.
SI10	80	John	Pearce	Harris Lamb	Bloor Homes	<p>BHW have submitted other representations on respect of the other land interests that they have in and around the settlements of Hagley and Alvechurch. As such, BHW are also supportive of Option 3 which looks to direct some development on the larger settlements, such as Hagley, in the District. We consider that a mix of sites, including both larger, medium and smaller sites will be required to meet the different and competing needs of the District in terms of meeting its own needs but also those of Birmingham. As such, and in addition to the Frankley site, we consider that there will be a need to meet the need of the District in the larger more sustainable settlements. Hagley as the second largest settlement in the District, is therefore, a sustainable settlement and one which already is well served by existing shops, services and facilities. Directing new housing to Hagley would help sustain existing infrastructure but also minimise the amount of new infrastructure that would need to be created to support the new development.</p> <p>We would therefore be supportive of a mix of Options 5 and 3 being promoted and recommend that the Council identify a mix of sites to achieve both development in both of the identified locations.</p>	Support for a mix of Options 5 and 3 is noted.
SI10	80	John	Pearce	Harris Lamb	Bloor Homes	<p>In light of BHW's land at interests at Frankley, which is located immediately adjacent to the built up edges of Birmingham, their preferred focus for new growth would be Option 5, which seeks to direct new housing growth to the edge of the West Midlands conurbation . Due to the size of BHW's land control, this could deliver a significant quantum of new housing to meet part of Bromsgrove's unmet housing needs, but also those of Birmingham City. In pursuing this option, it would enable a significant amount of Birmingham's unmet needs to be met in a sustainable location. Furthermore, the development of the sites could create additional recreation and public open space that would have a wider community benefit as well as delivering new affordable housing. Due to the size of the site and the number of dwellings that could be delivered, it has the potential to accommodate the housing needs of Birmingham in the post 2031 period, thereby providing a longer term solution to meeting Birmingham's needs going forward.</p>	Support for Option 5 is noted.
SI10	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	<p>The supply of large numbers of new homes can often be best achieved through planning for larger scale developments, such as new settlements or significant extensions to existing villages and towns (NPPF #72). Of particular note are Options 2,3 and 4 which seek to focus new development on transport corridors, large settlements and dispersing development around the District. In this context our clients site is ideally located. The District should focus new developments on sites such as this which is in an area of adequate capacity for growth without requiring significant new infrastructure to bring it forward.</p>	Support for Options 2,3 and 4 is noted.
SI10	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	<p>Option 4 - considers that it will be necessary to consider a range of development options in the plan area and that development of an appropriate scale should be distributed throughout the settlement hierarchy in recognition of the role of individual settlements.</p>	Comments relating to the District's settlement hierarchy are noted and agreed.
SI10	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	<p>Option 1 would be the preferred option in light of the representor's land interests.</p>	Support for Option 1 is noted.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	86	Rebecca	Anderson	Iceni Projects	Generator Developments	<p>We consider that Option 1 (Focus Development on Bromsgrove Town) and Option 2 (Focus Development on transport corridors and/or locations with good transport links) are the most appropriate to meet the District's future needs.</p> <p>Bromsgrove Town is in close proximity to the site, and offers a wide variety of services. Bromsgrove Railway station is also located within a reasonable distance to the site, offering frequent services direct to Birmingham. Therefore, the site is located in a sustainable location, and can locate housing in good distance to employment opportunities and services. Our site, in particular, is well located to take advantage of these sustainable development opportunities.</p> <p>We consider that locating development on the edge of Birmingham will mean that the economic benefits that could support the services and facilities of the town of Bromsgrove will be missed. In addition, the additional infrastructure delivery associated with new housing could provide further benefits as well as relieving existing deficiencies in Bromsgrove.</p>	Support for Options 1 and 2 is noted.
SI10	86	Rebecca	Anderson	Iceni Projects	Generator Developments	The Council should seek to deliver the majority of its development in and around the town of Bromsgrove to support the local economy in the town	Support for Option 1 is noted.
SI10	87			Indenture		Please see answers to SI 9 and SI 8.	Comments are noted.
SI10	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>We also agree that a range of development options should be pursued. This would be important in ensuring that the annual housing delivery targets are achieved, and would support the long-term sustainability of the key settlements.</p> <p>We would suggest that the following key options would provide the basis for the most appropriate development strategy going forwards. This approach would provide the basis for a sustainable development strategy that meets the needs of Bromsgrove District and the wider area over the Plan period and beyond:</p> <p>Option 1 - Focus development on Bromsgrove town;</p> <p>Option 2 - Focus development on transport corridors and/or locations with good transport links;</p> <p>Option 3 - Focus development on the Large Settlements, as identified in the existing BDP; and,</p> <p>Option 6 - Focus development on the edge of Redditch.</p> <p>Focusing some development on the other large settlements identified in the existing Bromsgrove District Plan would also ensure that development could be distributed around the District in a sustainable manner, and one that supports the well-being of those settlements that have the capacity to accommodate growth. Taylor Wimpey does not support the distribution of growth around all settlements in the District, as this may raise issues in respect of the sustainability and deliverability of development.</p> <p>Finally, by concentrating development around existing and proposed new infrastructure it would also ensure that it benefits from a sustainable location with good access. Such an approach is consistent with paragraph 72a of the revised NPPF, which states that local planning authorities should consider the opportunities presented by existing or planned infrastructure when considering options for large scale new residential developments.</p>	Support for Options 1,2 ,3 and 6 is noted
SI10	89	Reuben	Bellamy	Lone Star Land	Client	<p>There are considerable difficulties with the other options.</p> <p>Option 6 - would involve areas of the most important green belt, will not provide enough land to meet all the district needs and would not cater for the District for geographical reasons.</p>	The difficulties associated with Option 6 are noted.
SI10	89	Reuben	Bellamy	Lone Star Land	Client	<p>There are considerable difficulties with the other options.</p> <p>Option 5 - might be appropriate for meeting some of the unmet needs of the conurbation but the locations will be limited due to the importance of the green belt on the edge of the conurbation. This option is unlikely to provide enough land to meet the needs of the District.</p>	Comments relating to Option 5 are noted.
SI10	89	Reuben	Bellamy	Lone Star Land	Client	<p>There are considerable difficulties with the other options.</p> <p>Option 4 - could not meet the level of need without leading to unsustainable travel patterns, increased congestion and reduced air quality.</p>	Comments relating to Option 4 are noted.
SI10	89	Reuben	Bellamy	Lone Star Land	Client	<p>There are considerable difficulties with the other options.</p> <p>Option 1 - is unlikely to deliver the level of growth needed and won't meet the wider needs of the district. Also, Bromsgrove station is remote from the bulk of the town.</p>	Comments relating to Option 1 are noted

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SI10	89	Reuben	Bellamy	Lone Star Land	Client	There is also brownfield land close to Alvechurch station at the Old Brickworks. Options 2 and 3 would allow a coordinated approach to the opportunities afforded by the existing rail transport corridors and allow for the most sustainable settlement strategy that meets the policy requirements of the NPPF at paragraphs 103 and 138.	Support for Options 2 and 3 is noted.
SI10	89	Reuben	Bellamy	Lone Star Land	Client	A combination of Option 2 and Option 3 would be the most sustainable and deliverable option. Paragraph 103 of the NPPF states that the planning system should actively manage patterns of growth to promote sustainable transport. It states: "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help reduce congestion and emissions, and improve air quality and public health."	Support for Options 2 and 3 is noted.
SI10	89	Reuben	Bellamy	Lone Star Land	Client	There are considerable difficulties with the other options. Option 7 - will have a long lead in period and would only start to deliver in the later stages of the plan period. There is little political support for this option.	The comments in relation to Option 7 are noted.
SI10	89	Reuben	Bellamy	Lone Star Land	Client	There are considerable difficulties with the other options. Option 9 urban intensification is unlikely to deliver the level of growth needed. Urban intensification might work if it is concentrated on the rail corridors but again that will not be enough to deliver the need and is likely to involve a house type that is only attractive to a small part of the market in housing need.	The comments relating to urban intensification are noted.
SI10	89	Reuben	Bellamy	Lone Star Land	Client	There are considerable difficulties with the other options. Option 8 - will not provide the quantity of land needed and is located in the wrong place to meet the district's needs. As noted elsewhere the standard method does not account for Redditch's employment aspirations and the methodology itself is being reviewed.	The comments in relation to Option 8 are noted.
SI10	90	Owen	Jones	LRM Planning	Persimmon Homes	Option 6 - It is inconceivable that Redditch will be able to meet its future development needs to the extent that adjoining authorities will not need to cater for its unmet need. On this basis additional development land adjacent to Redditch will be to meet the needs of Redditch rather than the needs of Bromsgrove. The Option to focus development at Redditch cannot be a genuine Option to meet Bromsgrove's needs.	Support for Option 6 is noted.
SI10	90	Owen	Jones	LRM Planning	Persimmon Homes	Option 9 - Para 4.31 of the GBHMA SGS succinctly explains that the Council does not consider that any additional sources of supply are available to yield additional supply such as open space, employment sites or public land. On this basis such an approach does not represent a genuine Option as to how to accommodate new development. We believe the most appropriate strategy would be a combination of Option 1 and Option 5. This would focus development at the most sustainable settlement in the District, Bromsgrove, whilst also enabling development adjacent to the conurbation close to where needs arise. Only after the capacity of these locations have been exhausted, should greater dispersal in Option 3 be considered.	Support for Options 1 and 5 and 3 are noted.
SI10	90	Owen	Jones	LRM Planning	Persimmon Homes	Option 7 - The Greater Birmingham Housing Market Area Strategic Growth Study identified an area of search for a new settlement in the Green Belt between Birmingham, Bromsgrove and Redditch. Such options were put forward in the context of the how the Housing Market Area's needs, including unmet need for the conurbation, could be distributed. Moreover, regard must also be had to the likely lead time associated with a new settlement from its inception to the delivery of a material supply of housing. A new settlement is very much a proposition that would feature in the longer term and should not therefore take precedent over meeting short and medium term needs. Put simply, a new settlement option, could not be the only strategy and could not be in preference to Options 1 and 5.	The comments in relation to Option 7 are noted.
SI10	90	Owen	Jones	LRM Planning	Persimmon Homes	Option 5 - the assessment of the settlement hierarchy previously did not consider the merit of locating development on the edge of the West Midlands conurbation. Circumstances are very different now and there is an identified need to accommodate new housing which is related to Birmingham and the Black Country. On this basis, locating new development in areas that adjoin the conurbation and are accessible to services and facilities would represent a sustainable option as part of a balanced strategy alongside Options 1 and 2.	Support for Options 1,2 and 5 is noted.
SI10	90	Owen	Jones	LRM Planning	Persimmon Homes	Option 4 - This is a further dispersal of development around the District which would to be a greater extent the least sustainable strategy.	Comments relating to Option 4 are noted.
SI10	90	Owen	Jones	LRM Planning	Persimmon Homes	Option 3 - this is a more dispersed strategy than Option 1, by spreading development across a larger number of settlements. Depending on the extent of distribution of new development away from Bromsgrove as the main and most sustainable town, this will be a less sustainable option. This is sub-optimum in this regard.	Comments relating to Option 3 are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	90	Owen	Jones	LRM Planning	Persimmon Homes	Option 2 - In addition to being the principal settlement within the District, Bromsgrove Town is also situated within an established transport corridor. The extension of the cross city train line to Bromsgrove is rightly referred to as a "significant event" and will offer far more opportunities for travel by train from Bromsgrove Town to access job opportunities, larger retail and leisure services, and higher education opportunities. This underlines the significance of Bromsgrove Town as the focus for future development and reinforcing Option 1.	Comments relating to Option 2 are noted.
SI10	90	Owen	Jones	LRM Planning	Persimmon Homes	Option 1 - this would be consistent with the existing Strategic Objective in the adopted Local Plan SO2 to focus new development in sustainable locations in the District such as on the edge of Bromsgrove Town in the first instance. In contrast other settlements within the district are smaller with commensurately less services and facilities. In the context of the NPPF's objective to promote sustainable patterns of development, the spatial strategy should continue to focus development at Bromsgrove Town. As with the adopted Local Plan, urban extensions to the Town are legitimate and necessary to contribute to this sustainable development strategy. Allied to this the Green Belt around Bromsgrove will need to be amended.	Support for Option 1 is noted.
SI10	90	Owen	Jones	LRM Planning	Persimmon Homes	Option 8 - As indicated above, it is inconceivable that Redditch will be able to meet its future development needs to the extent that adjoining authorities will not need to cater for its unmet need, irrespective of the indication in the standard method that growth levels could be lower. On this basis, reconsidering unconsented allocations would reduce Redditch's ability to meet its housing need in the longer term and require compensatory provision elsewhere. This is not a genuine Option.	Comments relating to Option 8 are noted.
SI10	91	Max	Plotnek	Maddox Planning	David Goldstein	Option 3 - Should be considered as a sustainable approach to meet the District's future needs. Option 3 should be selected alongside Option 1 as Bromsgrove is the largest settlement in the area and is therefore a sustainable location for growth.	Support for Option 3 and 1 is noted.
SI10	92	Andrew	Watt	Maze Planning Solutions	Client	Give the existing Green Belt Constraints and the proposed review necessary to release adequate land for future development a combination of Options 2 (transport corridors), 3 (large settlements) and 7 (a new settlement) should be preferred. It will provide a balanced range of development opportunities and share the burden of new development across the District.	Support for Options 2, 3 and 7 is noted.
SI10	93	Gary	Moss	MSC Planning Consultants	Client	Support a Local Plan based on the following options: Option 1. Option 3. But most importantly Option 4 in order to support small scale growth of rural villages. Furthermore, options 3 and 4 provide an opportunity for the Council to meet the Government/NPPF requirement of allocation of small scale sites.	Support for options 1, 3 & 4 is noted and the requirement of allocation for small sites.
SI10	94			Nigel Gough Associates	Aniston Ltd	See answers to SI9 and SI 9. Land that is currently on the Birmingham border, but technically in Bromsgrove District and which adjoins existing housing should be preferred above all others.	Support for Option 5 is noted.
SI10	96			Nigel Gough Associates	Mr Stapleton	<b>*LAND FRONTING SHAW LANE, STOKE PRIOR*</b> None of the options are reasonable or fair. They do not take into account Birmingham's overspill requirement under their adopted plan, where the figure to assist Birmingham needs to be around 10,000 dwellings.  Bromsgrove needs to provide for its own needs up to 2036 and should have a figure around 7,500 dwellings. There will be a continuing requirement for Bromsgrove to provide for Birmingham's overspill and further land should be identified in the green belt and as safeguarded land capable of being released appropriately.  Land that is on the Birmingham border and which adjoins existing housing should be preferred. This is the case for BDC226, which is owned by our Clients and is highly sustainable.	The lack of support for any of the identified options is noted.
SI10	96			Nigel Gough Associates	Mr Stapleton	<b>*LAND AT THE ELMS, ROCK HILL*</b> None of the options are reasonable or fair. They do not take into account Birmingham's overspill requirement under their adopted plan, where the figure to assist Birmingham needs to be around 10,000 dwellings. Bromsgrove needs to provide for its own needs up to 2036 and should have a figure around 7,500 dwellings. There will be a continuing requirement for Bromsgrove to provide for Birmingham's overspill and further land should be identified in the Green belt and as safeguarded land capable of being released appropriately.	The comments are noted with regard to the reasonableness of the growth options. However it is noted that the respondent has not put forward alternative options for consideration.
SI10	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	Please see answers to SI8 and SI9.	Comments are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	98	Sally	Oldaker			Option 4, because it means everyone gets some development, rather than having it all in one place Option 5, because it's in a more urban area already Option 9, as above.	Support for options 4,5 & 9 is noted.
SI10	99	Mark	Dauncy	Pegasus	Gallagher Estates	Agree that a combination of options is needed . Options 1,3,5 and 6 should be considered in conjunction with each other. Option 7 isn't supported, not considered sustainable or consistent with Strategic Objective 2. Will require a significant amount of supporting infrastructure, which will delay delivery.	Support for options 1,3,5 & 6 is noted.
SI10	100	Ryan	Bishop			Options 2, 4 and 5 would be my selected options. Due to the district being so spread and employment on borders in neighbouring areas coupled with the demand from Birmingham I believe we should target areas that can deliver sustainable transport options without large infrastructure requirements (adding additional budget requirements to the district in the future) – especially where we have existing infrastructure in the district to cope with additional demand. We know there is a huge pressure from neighbouring counties (Solihull and Birmingham) – providing extra houses closer to those areas means a larger house price (typically) – which in term means larger council tax bills – better for the district. Option 4 allows us to spread the allocation across the district – this typically will be more agile to deliver, reduce the risk of a single developer/land owner to progress/develop and assist in delivering a diverse variety of properties.	Support for Options 2,4 & 5 is noted.
SI10	103	Chris	May	Pegasus	Persimmon Homes	A combination of the options is likely to be needed in order to meet not only the development needs arising within Bromsgrove District, but also within neighbouring authorities, including Redditch and Birmingham.  Option 6 is supported. As a location for further housing growth, Redditch as a town is a highly sustainable settlement. It is suggested that established patterns of growth to the north west of the town can continue beyond the existing allocations and development, providing a sustainable arc of linked developments which respect and enhance the built and natural environment in the area.	Support for Option 6 is noted.
SI10	105	David	Onions	Pegasus	Persimmon Homes & Gallagher Estates	The inference behind Option 8 is that if land within the allocations has not been consented then there is potentially an opportunity to deallocate the site and maybe return it to the Green belt. This would clearly run counter to national policy set out in the NPPF which states Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. It is clear that the adopted version of the Local Plan has already established that the Brockhill site is suitable for residential development. There is no justification for reviewing the allocation of the site when it has already been established through examination of the current plan that it is suitable for residential development.	The comments in relation to Option 8 are noted.
SI10	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	The notion of a suite of possible styles of development packages is probably unlawful. The requirement in law (PCPA 2004) is securing sustainable development- this will be achieved by a programme of work which seeks to optimise the pattern of development against sustainable development objectives.	The comments in relation to optimising the location of new developments against sustainable development objectives are noted. Sustainability Appraisal will be an essential part of options testing.
SI10	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	<ul style="list-style-type: none"> <li>• Bromsgrove should be the principal location for new development, given its size, facilities and transport links, including rail. Meets both Options 1 and 2.</li> <li>• Option 4: Disperse development around the District: not sustainable</li> <li>• Option 5: Focus development on the edge of the West Midlands conurbation, along our border with Solihull/Birmingham/Dudley? Whilst there will be a role for this to meet the needs of the conurbation in particular, it will not necessarily be the most sustainable approach, not necessarily being close to non-car modes of transport or the full range of facilities.</li> <li>• Option 7, new settlement: not meet current need, take too long to bring forward, if possible.</li> <li>• Option 8; Reconsideration of existing unconsented allocations on the boundary with Redditch Borough? It may be questioned why this approach would now be appropriate. It would result in increased allocation on the basis of presently not delivering. It is difficult to see benefits of this approach. For instance, how would this fit with Option 6, Focus development on the edge of Redditch?</li> </ul>	Support for Options 1 and 2 is noted.
SI10	108	Chris	Quinsee	Q&A Planning Services	Client	It is evident that any strategy for accommodating growth should include, as part of its approach, the need to focus development along transport corridors and locations with good transport links (Option 2). The alternative – focussing development in less accessible locations – is neither sustainable nor commercially attractive. In addition we believe that the wider Bromsgrove area offers good opportunities for growth on carefully-selected sites with good access to the primary road network.	Support for Option 2 is noted.

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SI10	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	<p>A combination of Options 1, 2, 3, 4 and 9 are most appropriate.</p> <p>As per Option 8, we consider that it arguably goes without saying that all unconsented allocations should be reviewed, along with allocated sites subject to lapsed permissions. Any sites that have been subject to an allocation but have not come forward should be reconsidered fully and objectively. Para 67 of the NPPF is clear on availability, suitability and likely economic viability, such sites should be appropriately scrutinised if they have failed to deliver so far.</p>	Support for a combination of Options 1,2,3, 4 and 9 is noted.
SI10	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	<p>As per Option 8, we consider that it arguably goes without saying that all unconsented allocations should be reviewed, along with allocated sites subject to lapsed permissions. Any sites that have been subject to an allocation but have not come forward should be reconsidered fully and objectively. Para 67 of the NPPF is clear on availability, suitability and likely economic viability, such sites should be appropriately scrutinised if they have failed to deliver so far.</p>	Comments relating to the review of existing allocations are noted.
SI10	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	We consider a combination of Options 1, 2, 3, 4 and 9 are most appropriate	Support for Options 1, 2, 3, 4 and 9 is noted.
SI10	113	Gareth	Sibley	RCA Regeneration	CAD Square	<p>We consider a combination of Options 1, 2, 3, 4 and 9 are most appropriate. As per Option 8, we consider that it arguably goes without saying that all unconsented allocations should be reviewed, along with allocated sites subject to lapsed permissions. Any sites that have been subject to an allocation but have not come forward should be reconsidered fully and objectively. Para 67 of the NPPF is clear on availability, suitability and likely economic viability, such sites should be appropriately scrutinised if they have failed to deliver so far.</p>	Support for a combination of Options 1,2,3,4 & 9 is noted.
SI10	114	Charles	Robinson	Rickett Architects	Cawdor	<p>An overreliance upon major site releases must be avoided. The selection strategy should be a mix of 2,4 and 5. There is a lot of growth pressure from the West Midlands conurbation but there should be dispersed growth as well to enable existing settlements to grow &amp; thrive.</p>	Support for Options 2,4 and 5 is noted.
SI10	115	John	Breese	Rosconn Strategic Land		<p>A combination approach of Options 1, 2 and 3 would be the most appropriate strategy to meeting the District's future needs in a sustainable manner.</p> <p>Options 1 &amp; 3 are considered appropriate as these represent a continuation of the existing spatial strategy within the Bromsgrove District Plan 2011 – 2030 which focuses new development predominately at Bromsgrove town with further development located at the Large Settlements.</p> <p>Option 2 focusing development on transport corridors and/or locations with good transport links is supported by section 9 of the NPPF which directs that significant development should be focused on locations which are or can be made sustainable through offering a genuine choice of transport modes to help minimise the negative environmental impacts of travel.</p> <p>The focusing of development on public transport corridors in Bromsgrove has been explored in the wider context of the Greater Birmingham and Solihull LEP Black Country Local Authorities Strategic Housing Needs Study Stage 3 Report by Peter Brett Associates (August 2015) which concluded a positive feature of locating growth near public transport corridors south of the Housing Market Area was that this is where the demographic and economic pressures related to Birmingham's unmet need and economic growth potential of the City and Solihull are greatest.</p> <p>RSL consider the focus should be on Bromsgrove Town and Large Settlements with train station over the Large Settlement without with a review of the settlement hierarchy a useful exercise, as the provision of new housing in these locations provide the dual benefit of meeting district needs and/or the unmet needs from Birmingham as these have the most sustainable transport links to the city.</p> <p>In line with the NPPF paragraph 68 the Council should seek to allocate a balance of small, medium and large sites to ensure there is sufficient amount of choice of land within the market to meet the identified need of the different groups. A broad distribution of sites of various sizes in sustainable locations well served by public transport would achieve this aim.</p>	Support for the Combination of Options 1,2 and 3 is noted. Comments relating to a balance of small, medium and large sites are noted and agreed.
SI10	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	<p>Each of the options have merits in their own right but should clearly seek to support delivery of the plan strategy.</p> <p>Agree that an appropriate strategy will entail a combination of options .Certain options may lend themselves to certain needs ahead of others, Option 5 would facilitate the better integration of an urban extension into the conurbation. Options that allow for delivery of development to address the needs of existing communities and allow settlements to grow in a sustainable manner should also be pursued as part of the strategy.</p>	The comments in relation to a combination of the options are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	119	Darren	Oakley	RPS Group	Gleeson	<p>RPS welcome the opportunity to comment on distribution options as a starting point for future engagement. In general terms, each of the options have merit in their own right but should clearly seek to support delivery of the plan strategy. RPS agrees with the Council that an appropriate strategy will entail a combination of options. That said, RPS particularly support any option/options that will most likely ensure the timely delivery of new development.</p> <p>It should also be recognised that certain options may lend themselves to certain needs ahead of others. For example, option 5 would closely relate most appropriately to addressing the unmet needs of the West Midlands conurbation and would facilitate the better integration of any such extension into the established built-up area of the conurbation.</p> <p>Furthermore, options that allow for delivery of new development to address the needs of existing communities and also allow settlements to grow in a sustainable manner should also be pursued as part of the strategy. Irrespective of the potential requirement from outside the District, there is still a clear need for the existing settlements to grow and in this regard, consideration is given to the existing shortfalls in housing need. Although the Plan is not yet sufficiently advanced to consider sites, RPS would recommend the consideration of Gleeson's site at Marlbrook as part of the subsequent Preferred Options Stage. This site was submitted to the Council as part of the previous 'call for sites' as a sustainable extension to Marlbrook, illustrated as part of a Promotional Document (enclosed again in Appendix 1).</p> <p>As one of the larger and more sustainable settlements, RPS consider that there is a mandate for further growth at Marlbrook, as part of the wider Catshill Service Centre, and should include allocations of land as part of the LPR. This is particularly important for a District such as Bromsgrove, which is heavily impacted by the Green Belt, which has a limiting effect on where development can come forward. This limits the ability for organic growth in the District and it is therefore proposed that the Council use the LPR to enact positive change for the existing settlements, in addition to any wider strategic growth that is considered necessary.</p>	The comments relating to Marlbrook's role as part of the wider Catshill Service Centre are noted and will be considered further through the Plan Review process.
SI10	120	Michael	Davies	Savills	Cala Homes	Option 4 is the most appropriate and sustainable. Future growth should be directed to sustainable settlements in the District, sites which are adjacent to existing settlements and in proximity to public transport options should be considered for development as these are the most sustainable locations.	Support for Option 4 is noted.
SI10	122	Michael	Davies	Savills	Landowners	<p>We consider that 'Option 4: Disperse development around the District, allocating some new growth to a variety of settlements to allow them to grow' is the most appropriate and sustainable to meet Bromsgrove's future needs.</p> <p>We agree with the text of paragraph 4.22 that the scale of such development need to take account of current settlement size and the ability to increase services and facilities.</p> <p>We consider that future growth should be directed to sustainable settlements in the District. Sites which are adjacent to existing settlements and in proximity to public transport options should be considered for development above sites which are not adjacent to settlements as it is considered that these are the most sustainable locations.</p>	Support for Option 4 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	123	Michael	Burrows	Savills	Landowners	<p>Options 3 and 4 represent the most sustainable combination of options for meeting the District's future needs. Bromsgrove District has an existing range of settlements. A settlement hierarchy has already been established through the adopted BDP Settlement Hierarchy Policy BDP2. The purpose of the settlement hierarchy is identified in the adopted BDP as providing a clear policy on the future role of the District's settlements and villages to enable allocation of appropriate levels and types of development to different settlements within the District, focusing new development in locations which will provide and support sustainable communities.</p> <p>NPPF paragraph 72 identifies that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, which can include significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.</p> <p>It is considered that the approach to apportioning new development across the District based on continuing to apply the existing BDP settlement hierarchy through planned extensions to the settlements is an appropriate and sustainable approach. Sites which are adjacent to existing settlements and in proximity to public transport options should therefore be considered for development.</p> <p>Acknowledge the approach highlighted under Option 3 that the amount of development which could be attributed to the settlements would need to take account of current settlement size, existing facilities and whether there is an opportunity to increase services and facilities.</p> <p>Alvechurch is an existing Large Settlement. As highlighted within the Area Assessment Study (September 2013) Alvechurch has a railway station on the Cross City line, a bus service linking to Birmingham and Redditch and a good range of existing services and facilities located along Red Lion Street, Bear Hill and Radford Road, including a number of shops, restaurants, pubs and a doctor's surgery. Alvechurch was awarded a sustainability score of 53 in the BDP Settlement Hierarchy Paper (September 2012), ranking it the second highest scoring settlement in the District after Bromsgrove Town. It is therefore considered absolutely right that further development should occur at Alvechurch within the next Plan period as advocated by Options 3 and 4.</p>	Support for apportioning new development across the District through continuing to apply the existing settlement hierarchy and identifying sites adjacent to existing settlements is noted.
SI10	124	Robert	Lofthouse	Savills	Taylor Wimpey	<p>In the context of the delivery of the Perryfields development, we consider that Option 1, to focus development on Bromsgrove town, remains a sustainable approach to future growth and development. Sites of varying sizes will be required to maintain a deliverable supply of housing sites throughout the plan period and further representations by Taylor Wimpey will be made to identify such opportunities. However, the magnitude and importance of the Perryfields development, as a site of strategic importance, should not be understated.</p>	Support for Option 1 is noted.
SI10	126	Rachel	Best	Stansgate Planning	Access Homes LLP	<p>A combination of the broad options focusing on sustainable development principles and particularly accessibility by public transport is appropriate. Furthermore, a combination that provides for a variety of site locations and sizes would give the best chance of delivery of housing and allow for small sites to be identified to accommodate 10% of the districts housing requirement.</p> <p>A combination of Options 4 and 5 is supported. Option 4 provides for development to be dispersed around the District, allocating some new growth to a variety of settlements to allow them to grow; and Option 5 aims to focus development on the edge of the West Midlands conurbation, along the districts border with Solihull/Birmingham/Dudley. Option 5 would be major new development with housing and community facilities.</p> <p>A combination of these two options with an underlying focus on sustainable settlements and accessibility by public transport would allow for the needs of communities to be met to ensure organic growth to maintain dynamic and sustainable communities and the catchment they serve. A settlement hierarchy is already established in the adopted District Plan which is based on a sustainability score having regard to the services and facilities that are available in each settlement. Proportionate growth having regard to scale of settlement and facilities based on the settlement hierarchy, should form the basis for dispersing development around the District.</p> <p>Furthermore, this will allow for a variety of site sizes that are likely to be easy to deliver without need for significant new infrastructure to be in place before development. Such sites can maintain a supply of new homes whilst larger more complex sites that require new infrastructure are planned and brought forward over a longer time period.</p> <p>Such dispersal approach will also allow opportunities for identification of a raft of small and medium size sites. Such sites will meet the need for local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare in accordance with paragraph 68a of the NPPF 2018.</p> <p>Option 5 would be an appropriate response to finding sites not only to meet Bromsgrove's own needs in an accessible way but particularly cross boundary growth to meet the needs of the conurbation as growth in such locations is well placed to meet the need where it arises.</p>	Support for a combination of Options 4 and 5 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	127	Rachel	Best	Stansgate Planning	AE Becketts and Sons Ltd	<p>A combination of Options 4 and 5 is supported with an underlying focus on sustainable settlements and accessibility by public transport would allow for the needs of communities to be met to ensure organic growth to maintain dynamic and sustainable communities and the catchment they serve. Proportionate growth having regard to scale of settlement and facilities based on the settlement hierarchy, should form the basis for dispersing development around the District. This will allow for a variety of site sizes without the need for significant new infrastructure to be in place before development. Such dispersal approach will also allow opportunities for identification of a raft of small and medium size sites.</p> <p>Option 5 would be an appropriate response to finding sites to meet Bromsgrove's own needs and particularly cross boundary growth to meet the needs of the conurbation.</p> <p>The NPPF paragraph 138 sets out the guidance on reviewing Green Belt Boundaries and all three matters need to be applied to the chosen distribution strategy.</p>	Support for a combination of Options 4 and 5 is noted.
SI10	128	Rachel	Best	Stansgate Planning	J Rigg Construction Ltd	<p>A combination of the broad options focusing on sustainable development principles and particularly accessibility by public transport is appropriate. Furthermore, a combination that provides for a variety of site locations and sizes would give the best chance of delivery of housing and allow for small sites to be identified to accommodate 10% of the districts housing requirement.</p> <p>A combination of Options 4 and 5 is supported. Option 4 provides for development to be dispersed around the District, allocating some new growth to a variety of settlements to allow them to grow; and Option 5 aims to focus development on the edge of the West Midlands conurbation, along the districts border with Solihull/Birmingham/Dudley. Option 5 would be major new development with housing and community facilities. Proportionate growth having regard to scale of settlement and facilities based on the settlement hierarchy, should form the basis for dispersing development around the District.</p> <p>Furthermore, this will allow for a variety of site sizes that are likely to be easy to deliver without need for significant new infrastructure to be in place before development. Such sites can maintain a supply of new homes whilst larger more complex sites that require new infrastructure are planned and brought forward over a longer time period. Such dispersal approach will also allow opportunities for identification of a raft of small and medium size sites. Such sites will meet the need for local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare in accordance with paragraph 68a of the NPPF 2018.</p> <p>Option 5 would be an appropriate response to finding sites not only to meet Bromsgrove's own needs in an accessible way but particularly cross boundary growth to meet the needs of the conurbation as growth in such locations is well placed to meet the need where it arises.</p> <p>In all scenarios, to achieve the scale of development needed will require changes to Green Belt boundaries. The second and third matters (NPPF #138) present new guidance not previously included. All three matters need to be applied to the chosen distribution strategy and a combination of options 4 and 5 as set out above can allow for this.</p>	Support for a combination of Options 4 and 5 is noted.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	129	Rachel	Best	Stansgate Planning	Midlands Freeholds Ltd	<p>A combination of Options 4 and 5 is supported. A combination of these two options with an underlying focus on sustainable settlements and accessibility by public transport would allow for the needs of communities to be met to ensure organic growth to maintain dynamic and sustainable communities and the catchment they serve. A settlement hierarchy is already established in the adopted District Plan which is based on a sustainability score having regard to the services and facilities that are available in each settlement. Proportionate growth having regard to scale of settlement and facilities based on the settlement hierarchy, should form the basis for dispersing development around the District.</p> <p>This will allow for a variety of site sizes that are likely to be easy to deliver without need for significant new infrastructure to be in place before development. Such sites can maintain a supply of new homes whilst larger more complex sites that require new infrastructure are planned and brought forward over a longer time period.</p> <p>Such dispersal approach will also allow opportunities for identification of a raft of small and medium size sites. Such sites will meet the need for local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare in accordance with paragraph 68a of the NPPF 2018.</p> <p>Option 5 would be an appropriate response to finding sites not only to meet Bromsgrove's own needs in an accessible way but particularly cross boundary growth to meet the needs of the conurbation as growth in such locations is well placed to meet the need where it arises. It is primarily related to the sustainability of the location as it provides greater access to a wide range of services, facilities and employment opportunities more likely to be in close proximity and accessible on foot, cycle or public transport. It also provides opportunities for a larger scale growth and new infrastructure at a level not possible in other locations.</p>	Support for a combination of Options 4 and 5 is noted.
SI10	130	Rachel	Best	Stansgate Planning	Ms and Ms J Mondon Lines	<p>A combination of the broad options focusing on sustainable development principles and particularly accessibility by public transport is appropriate. Furthermore, a combination that provides for a variety of site locations and sizes would give the best chance of delivery of housing and allow for small sites to be identified to accommodate 10% of the districts housing requirement.</p> <p>A combination of Options 4 and 5 is supported. Option 4 provides for development to be dispersed around the District, allocating some new growth to a variety of settlements to allow them to grow; and Option 5 aims to focus development on the edge of the West Midlands conurbation, along the districts border with Solihull/Birmingham/Dudley. Option 5 would be major new development with housing and community facilities.</p> <p>A combination of these two options with an underlying focus on sustainable settlements and accessibility by public transport would allow for the needs of communities to be met to ensure organic growth to maintain dynamic and sustainable communities and the catchment they serve. A settlement hierarchy is already established in the adopted District Plan which is based on a sustainability score having regard to the services and facilities that are available in each settlement. Proportionate growth having regard to scale of settlement and facilities based on the settlement hierarchy, should form the basis for dispersing development around the District.</p> <p>Furthermore, this will allow for a variety of site sizes that are likely to be easy to deliver without need for significant new infrastructure to be in place before development. Such sites can maintain a supply of new homes whilst larger more complex sites that require new infrastructure are planned and brought forward over a longer time period.</p> <p>Such dispersal approach will also allow opportunities for identification of a raft of small and medium size sites. Such sites will meet the need for local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare in accordance with paragraph 68a of the NPPF 2018.</p> <p>Option 5 would be an appropriate response to finding sites not only to meet Bromsgrove's own needs in an accessible way but particularly cross boundary growth to meet the needs of the conurbation as growth in such locations is well placed to meet the need where it arises.</p>	Support for Options 4 and 5 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	131	Rachel	Best	Stansgate Planning Consultants Ltd	Mr N Meredith	<p>A combination of Options 4 and 5 is supported. Option 4 provides for development to be dispersed around the District, allocating some new growth to a variety of settlements to allow them to grow; and Option 5 aims to focus development on the edge of the West Midlands conurbation, along the districts border with Solihull/Birmingham/Dudley. Option 5 would be major new development with housing and community facilities.</p> <p>A combination of these two options with an underlying focus on sustainable settlements and accessibility by public transport would allow for the needs of communities to be met to ensure organic growth to maintain dynamic and sustainable communities and the catchment they serve. A settlement hierarchy is already established in the adopted District Plan which is based on a sustainability score having regard to the services and facilities that are available in each settlement. Proportionate growth having regard to scale of settlement and facilities based on the settlement hierarchy, should form the basis for dispersing development around the District.</p> <p>Furthermore, this will allow for a variety of site sizes that are likely to be easy to deliver without need for significant new infrastructure to be in place before development. Such sites can maintain a supply of new homes whilst larger more complex sites that require new infrastructure are planned and brought forward over a longer time period.</p> <p>Such dispersal approach will also allow opportunities for identification of a raft of small and medium size sites. Such sites will meet the need for local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare in accordance with paragraph 68a of the NPPF 2018.</p> <p>Option 5 would be an appropriate response to finding sites not only to meet Bromsgrove's own needs in an accessible way but particularly cross boundary growth to meet the needs of the conurbation as growth in such locations is well placed to meet the need where it arises.</p> <p>The reasoning behind Option 5 is primarily related to the sustainability of the location as it provides greater access to a wide range of services, facilities and employment opportunities more likely to be in close proximity and accessible on foot, cycle or pubic transport. It also provides opportunities for a larger scale growth and new infrastructure at a level not possible in other locations.</p> <p>In all scenarios, to achieve the scale of development needed will require changes to Green Belt boundaries.</p>	Support for Options 4 and 5 is noted.
SI10	132	Rachel	Best	Stansgate Planning	Mrs L Bastable	<p>A combination of Options 4 and 5 is supported. Option 4 provides for development to be dispersed around the District, allocating some new growth to a variety of settlements to allow them to grow; and Option 5 aims to focus development on the edge of the West Midlands conurbation, along the districts border with Solihull/Birmingham/Dudley. Option 5 would be major new development with housing and community facilities.</p> <p>A combination of these two options with an underlying focus on sustainable settlements and accessibility by public transport would allow for the needs of communities to be met to ensure organic growth to maintain dynamic and sustainable communities and the catchment they serve. A settlement hierarchy is already established in the adopted District Plan which is based on a sustainability score having regard to the services and facilities that are available in each settlement. Proportionate growth having regard to scale of settlement and facilities based on the settlement hierarchy, should form the basis for dispersing development around the District.</p> <p>Such dispersal approach will also allow opportunities for identification of a raft of small and medium size sites. Such sites will meet the need for local planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare in accordance with paragraph 68a of the NPPF 2018.</p> <p>Option 5 would be an appropriate response to finding sites not only to meet Bromsgrove's own needs in an accessible way but particularly cross boundary growth to meet the needs of the conurbation as growth in such locations is well placed to meet the need where it arises.</p> <p>The reasoning behind Option 5 is primarily related to the sustainability of the location as it provides greater access to a wide range of services, facilities and employment opportunities more likely to be in close proximity and accessible on foot, cycle or pubic transport. It also provides opportunities for a larger scale growth and new infrastructure at a level not possible in other locations.</p> <p>In all scenarios, to achieve the scale of development needed will require changes to Green Belt boundaries. The NPPF 2018 provides guidance on Green Belt boundaries and in reviewing boundaries or where it is concluded that it is necessary to release Green Belt land for development, paragraph 138 says the following matters should be considered.</p>	Support for Options 4 and 5 is noted.

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SI10	133	Rachel	Best	Stansgate Planning	Mr C Detloff	<p>A combination of Options 4 and 5 is supported with an underlying focus on sustainable settlements and accessibility by public transport would allow for the needs of communities to be met to ensure organic growth to maintain dynamic and sustainable communities and the catchment they serve. Proportionate growth having regard to scale of settlement and facilities based on the settlement hierarchy, should for the basis for dispersing development around the District. This will allow for a variety of site sizes without the need for significant new infrastructure to be in place before development. Such dispersal approach will also allow opportunities for identification of a raft of small and medium size sites.</p> <p>Option 5 would be an appropriate response to finding sites to meet Bromsgrove's own needs and particularly cross boundary growth to meet the needs of the conurbation.</p> <p>The NPPF paragraph 138 sets out the guidance on reviewing Green Belt Boundaries and all three matters need to be applied to the chosen distribution strategy.</p>	Support for Options 4 and 5 is noted.
SI10	134	David	Barnes	Star Planning	Richborough Estates	<p>Ignoring sub regional considerations, it is inevitable that a balanced spatial strategy will be adopted which will include a combination of Options 1, 2, 3 and 4. Such a strategy will deliver sustainable development and assist in maintaining rural settlements consistent with the National Planning Policy Framework. An obvious suitable location for growth is Barnt Green which sits on a public transport corridor and is a larger village with a range of retail, social and community facilities.</p> <p>To contribute to sub regional need then it would be appropriate for housing for Birmingham and the Black Country to be located adjacent to the conurbation to deliver new homes closer to where the need arises (Option 5). Such locations need not be exclusively for housing related to the conurbation. Hagley, which other than being within the Green Belt is unconstrained as a location for growth, is an example of a suitable and sustainable location for growth to meet these housing needs.</p> <p>If, as has happened, there is a need to accommodate growth from Redditch then Option 8 would need to be pursued.</p>	Support for Options 1,2,3 & 4 is noted.
SI10	135	Fran	Rowley	Turley	IM Properties	<p>Focussing development along transport corridors is a viable and sustainable option, given the M42 is a key asset for attracting investment and the corridor provides a defensible boundary to the wider countryside.</p> <p>High weight should be given to locations close to motorway junctions, which are accessible.</p> <p>This approach would be consistent with NPPF para 82 which requires LPAs to address the requirement of different sectors and ensure a variety of sites are identified.</p>	Support for Option 2 is noted.
SI10	135	Fran	Rowley	Turley	IM Properties	Welcome the proposed review of different development scenarios. All options will necessitate changes to Green Belt boundaries	These comments are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	136	Kathryn	Young	Turley	Land Fund	<p>Our client considers that a combination of Options 2 and 3 – focusing development on the Large Settlements with good transport links – provides the most appropriate and sustainable option for distribution and allocation of residential development. Urban extensions of Large Settlements will provide opportunities for sustainable growth in locations well connected to existing facilities and services. In turn, this will allow the settlements to grow and prosper, sustaining their services and meeting their own growth requirements.</p> <p>We support the acknowledgement that the amount of development to be attributed to individual settlements would need to take account of settlement size and existing/proposed/potential facilities.</p> <p>With regards to Option 2, Land Fund have reviewed the settlement hierarchy within Policy BDP 2 and its associated evidence base published in 2012 and note that of the large settlements, Hagley is the highest scoring (66) and therefore classed as the most sustainable with Wythall (57) the second most sustainable. It should however be noted that Hagley is likely to receive a higher score now as a result of the significant improvement since 2012 (when the evidence base was prepared) in rail services from Hagley. Hagley train station provides a frequent service to a number of key centres including Worcester, Birmingham and Stourbridge.</p> <p>With regards to the assessment of the distribution options within the SA, Land Fund would like to make the following comments with regards to this assessment material:</p> <ul style="list-style-type: none"> <li>• With regards to SA Objective 1 (Water, Soil and Air Quality) and SA Objective 5 (Climate Change), Land Fund believe that Options 2 and 3 should be recognised as having the potential for significant positive benefits to Air Quality and Climate Change (as a result of reduced GHG emissions from private car) within Bromsgrove as it would locate housing in the most sustainable locations and with access to sustainable modes of transportation.</li> <li>• With regards to SA Objective 12 (Town Centre Vitality and Community Facilities and Services), Land Fund note that the SA commentary within paragraph 5.4.26 suggests that those options that support existing services and facilities (such as Option 3) would perform more strongly however the SA scoring for each Option would appear to be identical. Land Fund would therefore suggest that the SA Scoping for Option 2 against SA Objective 12 should be</li> </ul>	Support for combination of Options 2 and 3 is noted
SI10	137	Matthew	Fox	Turley	Redrow Homes	<p>Redrow consider that a combination of Options 2 and 3 – focus development on the Large Settlements with good transport links – provides the most appropriate and sustainable option for distribution and allocation of residential development.</p> <p>Option 1 relates to a focus on Bromsgrove town. Although the town is the Tier 1 settlement in the BDP, it is already accommodating a significant quantum of growth through the Town Expansion Sites; 2,106 dwellings plus a smaller allocation of 181 at "Wagon Works". In addition to reviewing environmental and physical constraints to further expansion of the town, BDC will also need to consider the capacity of the market to deliver greater housing numbers alongside the existing expansion sites.</p> <p>Option 4 (disperse development around the District allocating some new growth to a variety of settlements to allow them to grow) is considered to be unsustainable. Dispersal in this manner would lead to unsustainable commuting patterns.</p> <p>Option 7 (a new settlement) will not deliver sufficient levels of housing in the short and medium terms. New settlements have significant lead-in times; 5,000-10,000 dwelling new settlements can take in excess of ten years from local plan allocation to deliver first housing completions. This would mean housing completions would be unlikely until the 2030s. This option should only be considered after sustainable urban extensions at the Large Settlements have been identified and exhausted and as a mechanism to deliver housing towards the end of the plan period (and beyond).</p> <p>We agree that Option 9 (urban intensification) is unlikely to deliver significant housing growth. Increasing densities may mean that the specific types of housing required by the market is not delivered in the right location to meet needs an</p>	Support for Options 2 and 3 is noted.
SI10	138	Charles	Robinson	Twelvetwentyone	Landowners	<p>An overreliance upon major site releases must be avoided: the selected strategy should be a mix of Options 2, 4 and 5. There is a lot of growth pressure from the W. Mids conurbation but there should be dispersed growth as well to enable existing settlements to grow and thrive.</p>	Support for Options 2, 4 and 5 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	139	Glenda	Parkes	Tyler Parkes	Oakland Developments	<p>It should be noted that it is the principle of a New Settlement that is put forward in the SGS for Bromsgrove District local planning authority to examine in more detail along with an examination of any other potential options, raised by the SGS and/or proposed by the District. More detailed technical analysis and evidence gathering is recommended. The site for a potential new settlement is not fixed and will depend on many factors, including deliverability.</p> <p>Our client recommends that the District pursue a combination of Options 2 and 7.</p> <p>Option 2 seeks to focus development on sites which are accessible, for example, to the primary road network. The NPPF, chapter 9, seeks to promote sustainable transport. Paragraph 103 requires the planning system to actively manage patterns of growth with significant development focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.</p> <p>Option 7 suggests identification of a new settlement to create a new community with housing, infrastructure and employment. This option is in line with the potential development options suggested in the SGS. It is also in line with the government's current political and financial support for development of new settlements.</p> <p>Development of a new settlement in Bromsgrove would provide a longer term solution to the growth demands in the District. It would ensure existing settlements are not subjected to unpopular and unacceptable pressure, in planning terms, for extensive additional development. It would also provide an opportunity to plan and design a settlement from scratch which should meet sustainable objective with the need for fewer compromises. There are advantages in identifying a site for a new settlement which lies away from existing larger settlements yet within easy access to good road transport links and close to smaller villages which would benefit in terms of future vitality and growth by being located close to a larger new settlement.</p>	Support for a combination of Options 2 and 7 is noted.
SI10	140	Sarah	Butterfield	White Young Green	Client	It is considered that a combination of the identified options are likely to be appropriate. This should include consideration of development along transport corridors, including appropriate servicing and roadside infrastructure, to take advantage of the District's identified economic advantage, being the M42 corridor. Option 2 should be considered further in the Local Plan Review.	Support for Option 2 is noted.
SI10	144	Ben	Symons			Option 5 - Objection: There have already been major recent developments both on the Solihull and Bromsgrove side of the border resulting in great strain being placed on local resources such as schools, doctors and dentists. Traffic has noticeably worsened to the point where further development will overload the existing infrastructure. In particular, on the Wythall/Solihull border are several large residential developments that have either recently been completed or are currently in progress. This is resulting in Solihull residents putting increased strain on Bromsgrove district resources.	The objection to Option 5 is noted.
SI10	148	Christine	Thomas		Self	<p>We understand the need to provide more varied housing however the infrastructure in Alvechurch can only withstand a small amount.</p> <p>A combination of several options seems reasonable.</p> <p>Development around Bromsgrove would be ideal. Development on the edge of Redditch seems appropriate. With regard to the highways infrastructure development around Wythall seems sensible. A very small pocket of housing may be reasonable in Alvechurch but with due consideration to all the factors above.</p>	Support for Options 1,4 and 8 is noted.
SI10	149	D	Lighton			Bromsgrove does not have the infrastructure to support further development, the amount of traffic is horrendous. Until a Western Relief Road is built the traffic will continue to make lives a misery. No one takes into consideration resident's feelings.	The comments in relation to traffic impacts are noted.
SI10	151	Dawn	Macqueen			Options 3 and 9 are preferable.	Support for options 3 and 9 is noted.
SI10	156	Fred	Carter			Options 1, 5 & 6 should be prioritised. Particular emphasis should be placed on transport hubs (railway and bus station) and motorway junctions for ease of connectivity.	Support for Options 1,5 & 6 is noted.
SI10	160	I M	Jarrett			Option 4 - Small developments (i.e. Not more than 100 dwellings) in what was the old Rural District Areas.	Support for Option4 is noted.
SI10	161	Ian	Macpherson		Self	Option 7 - New settlement in the longer term but also Option 8 - reassess 'Redditch' allocations in the shorter term. Possibly also Option 4 - disperse.	Support for Options 7,8 and 4 is noted.
SI10	165	Johanna	Wood			Options 1, 2 & 5	Support for Options 1,2 and 5 is noted.
SI10	166	John	Gerner			Options 2 and 3 preferred.	Support for Options 2 and 3 is noted.
SI10	174	Michael	Corfield			Options 1,3,5 and 9 are preferred, with options 4 and 7 being least preferred, to maintain the character and rural nature of the district.	Support for Options 1,3,5 & 9 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	176	Mr & Mrs J D	Winslow			<p>A combination of options (1), (2), and (3) would be most appropriate to meet Bromsgrove's future needs. Development, as suggested by Option (5), could also be regarded as appropriate and sustainable to meet the District's future needs but the location of the option area would also seem to offer the potential to satisfy future housing needs from outside the District.</p> <p>Option (6), focusing development on the edge of Redditch, needs further clarification since, for example, some areas may have easy access to rail and bus links whilst others do not.</p> <p>The M42 plays a significant role in the District's wider transport links and it seems logical, if Bromsgrove is seeking to broaden its economic base, to consider the use of land adjacent to it, at junctions 2 and 3, for new employment sites (cf. NPPF para. 81 and I and O, 4.9. 4.13. 6.14). However, new housing provision in this area, concurrent with the development of new employment opportunities, could encourage, amongst the workforce, more sustainable modes of travel, as could the channelling of housing development to nearby villages (NPPF para.138).</p> <p>Option 8 refers specifically to reconsideration of an unconsented allocation site at Foxlydiate – its availability, its deliverability and its appropriateness. We suggest that the first issue is straightforward, the second uncertain and the third arguable.</p>	Support for a combination of Options 1,2 and 3 in terms of the proximity to existing services is noted. In addition to comments relating to the use of land adjacent to junctions 2 and 3 of the M42 for new employment sites.
SI10	179	Neil	Gow	Burcot Garden Centre	Self	<p>The Green Belt around Bromsgrove definitely needs looking at and updating. While we believe Green Belt and what it stands for is important, it must also be logical and justifiable. Particularly Brown Field land in the Green Belt needs careful consideration. In the case of our own site at Burcot, there is not an item of 'green' in the whole 2 acres as either the land has buildings on it, other structures or asphalt parking area and hard standing. While sitting outside the old village envelope, we are surrounded by houses. Yet the pretext is 'though shalt not develop'. This prevents us from extending what we already do, or seeking to do something alternative. It does not make sense. Option 4 above would seem to be the nearest to meeting this need?</p>	Support for Option 4 is noted.
SI10	180	Nicholas	Rands			Option 2 and Option 4.	Support for Options 2 and 4 is noted.
SI10	182	Nick	Psirides			<p>I feel peripheral areas of the town centre such as Alvechurch, Bournheath, Stoke Prior etc., do need and can do with some infilling. I do not mean by that large development. Up to six or eight dwellings can be accommodated by a village without adding an unmanageable amount of strain to the local services such as schools, surgeries etc.</p>	Support for Option 4 is noted.
SI10	189	Phil	Pleasant		Self	<p>Support Option 1 and Option 9 and this would give the opportunity to develop brownfield sites where there is also more likely to be near public transport and employment. Developing on brownfield sites should be the first focus. Object to options 4 and 5- concerned that this will lead to increased and dense development on multiple sites, leading to major traffic and infrastructure issues which will not be addressed. This will also lead to joining up of settlements, massive urban sprawl and alter the unique character of the area being lost.</p>	Support for Options 1 and 9 is noted.
SI10	190	Philip	Ingram			Options 3 and 4 are most appropriate and sustainable. This will concentrate on the main settlements and disperse growth so that it can be more readily accommodated throughout the district.	Support for Options 3 and 4 is noted.
SI10	192			Dodford with Grafton Parish Council		<p>No single approach is likely to work; we need a combination of city centre development to enhance that environment, some development on the boundaries with other districts (and especially those where employment is most likely), and perhaps one or two brand new developments, if only because brand new communities would need the basic infrastructure to be in place before any dwellings are erected. Piecemeal extension of the rural settlements would not be helpful, unless the dwellings were very carefully designed to fit into the existing environment and its 'feel,' and there would be a significant risk of destroying such communities if the roads, shops, surgeries, bus routes, etc were not in place first.</p> <p>There are many narrow lanes, often single track, which are increasingly being used by HGVs. Even two cars find it impossible to pass and invariably one must pull into a private drive or onto the pavement (where one exists). More passing places are needed in rural areas. There is local pressure for the introduction of speed limits on narrow lanes, but the question arises as to how and whether these could be enforced.</p> <p>The Green Belt per se is only important in preserving the natural environment, both for reasons of sustainability and for appeal to newcomers.</p>	Comments relating to the combination of options are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI10	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		The Options should all take account of existing transport constraints, or include solutions.	The concerns about existing transport constraints are noted and agreed.
SI10	194	Darren	Oakley	RPS	Clients	In general terms, each of the options have merit in their own right but should clearly seek to support delivery of the plan strategy. RPS agrees with the BDC that an appropriate strategy will entail a combination of options. That said, RPS particularly support the option/options that will most likely ensure the timely delivery of new development. It should also be recognised that certain options may lend themselves to certain needs ahead of others. For example, Option 5 would closely relate most appropriately to addressing the unmet needs of the West Midlands Conurbation and would facilitate the better integration of any such extension into the established built-up area of the Conurbation and, in particular, enable Birmingham overspill growth to be delivered at location(s) closest to where the need arrives. In this regard development on the boundary edge of the Conurbation should be located where it can afford access to services and facilities and public transport provision. Furthermore, options that allow for delivery of new development to address the needs of existing communities and allow settlements to grow in a sustainable manner should also be pursued as part of the strategy.	Comments relating to the combination of options are noted.
SI10	195	D R	Clarke			My considered opinion is that the solution to the district's housing needs would be best found in Option 1 to develop areas within the vicinity of Bromsgrove itself limiting the new schemes to a boundary formed by the railway and motorways M5 and M42.  At the same time allow some housing to be added to large settlements and villages as shown in Option 3. Development to be constrained to a maximum of 50 extra houses per location.  Also consider the construction of a new settlement as Option 6 located with easy access to existing transport corridors.	Support for Options 1, 3 & 6 is noted.
SI10	196	Colin	Prince		Self	Along with my siblings, we are co owners of an area of land in St Godswalds Road, Aston Fields. The land has been in the family for many years and is of no real interest to us. It has no real agricultural value and it would be much more beneficial if it could be developed for housing. It is within walking distance of the newly refurbished station, which would be a huge advantage. We feel it is better to develop more small areas around the district than one huge development. Ideally brown sites should be developed but this will not fulfil the housing requirements for the foreseeable future. There is also more potential for employment in this area.	Support for Option 4 is noted.
<b>Q.SI11: Are there any other options for development that haven't been identified above?</b>							
SI11	10	Patricia	Dray	Highways England		We see the development of the potential options as matter for the council in the first instance. The nine options presented cover a range of potential ways forward which cover the major development strategy choices for the Council.	The comments on the broad development options are noted.
SI11	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council have the view that using the 2016 figures for projected housing need would reduce the need for greenbelt development.	The comments in relation to housing need are noted.
SI11	33	Steve	Colella	District Councillor		It has transpired that Redditch Borough Council vastly over estimated its housing needs and as a result BDC committed to taking c2700 houses 'off' Redditch. Having now confirmed that this is the extent of the overestimate the identified land should be 'saved' to form a growth point to meet Bromsgrove housing target to form a new Bromsgrove settlement i.e. this overestimate is more or less equal to Bromsgrove's housing needs.	The comments relating to Redditch's housing needs are noted.
SI11	34	Sue	Baxter			No	Noted.
SI11	36	Conrad	Palmer	Fairfield Village community Association		See SI 10 above.	Noted.
SI11	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	As per response to SI 10.	Comments are noted.
SI11	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	NO	Noted.
SI11	50	Debbie	Farrington	Cerda Planning	The Trustees	No	Noted.
SI11	60	Sara	Jones	Delta Planning	Moundsley Healthcare	We consider that development should be focused in the most sustainable locations, which in our view includes areas at the edge of the West Midland's conurbation (Option 5).	Support for Option 5 is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI11	86	Rebecca	Anderson	Iceni Projects	Generator Developments	Within the Birmingham HMA Strategic Growth Study, it indicated greater strategic constraints to develop in some authorities, for example Tamworth and Redditch would be unlikely to be able to make a substantive contribution to meeting unmet housing needs. We consider that it is sensible to test the potential to sustainably accommodate a higher proportion of the unmet need in Bromsgrove, in view of the constraints existing within other District's on land supply, and the sustainable location of Bromsgrove as a whole. Furthermore, the reliance of a new settlement to deliver a large quantity of housing may present issues of delivery, meaning Bromsgrove and the overall HMA will have further problems with meeting housing need in the future, backlogging it even further.	The comments relating to Bromsgrove potentially accommodating an increased housing figure from the WMHMA are noted.
SI11	86	Rebecca	Anderson	Iceni Projects	Generator Developments	A significant proportion of the overspill growth from Bromsgrove will need to be accommodated in the Local Plan	These comments are noted.
SI11	112	Gareth	Sibley	RCA Regeneration	Piper Group	Consider a combination of Options 1,2,3,4 and 9 are most appropriate. All unconsented allocations should be reviewed, along with allocates sites subject to lapsed permissions. Sites that have been subject to an allocation but have not come forward should be reconsidered fully and objectively.	Support for a combination of Options 1,2,3,4 & 9 is noted.
SI11	139	Glenda	Parkes	Tyler Parkes	Oakland Developments	Our Client formally recommends that the following options are included in the Plan Review: Option 10 – Prioritise the re-use of previously developed sites, including Green Belt sites. Option 11 – Prioritise the identification of housing sites close to existing villages and small villages to ensure they grow and thrive.	The suggested additional options are noted and agreed.
SI11	151	Dawn	Macqueen			The fundamental problem with the document and its inherent strategy is that ignores the needs of the many residents who do not live within a defined neighbourhood area i.e. those who lived in the more remote parts of the greenbelt (small hamlets and isolated residents in the Green Belt) Map on page 18 refers.	The comments relating to the needs of those residents who live in more rural parts of the District are noted and agreed.
SI11	152	Sue	Skidmore			Has the number of empty homes been taken into account when assessing brown field site provision? These could potentially provide significant additional housing.	The comments in relation to empty homes are noted. This will be taken into account although it is not considered that this would make a significant contribution towards meeting housing needs.
SI11	161	Ian	Macpherson		Self	no	Noted.
SI11	168	Judith	Billingham			With regard to the local developments that need to take place to reach the required number of houses. I understand some of the Green Belt land needs to be overturned and careful consideration is taken. We live on Bittell Road in Barnt Green which is the main road through Barnt Green and has a vast amount of traffic using it to travel from Birmingham through to Redditch. Unfortunately some drive too fast and has consequently lead to a number of accidents on the sharp corner (by the Barnt Green Cattery) which has had many a car overturned and in the ditch. The traffic has already increased with the new development next to the Barnt Green Inn and my concerns that with a new development behind 87 Bittell Road which would lead onto this stretch of Bittell road is another accident waiting to happen. Please also take into consideration that since the Foxhills Development it is extremely difficult to get an appointment at the doctors, It feels like I need to have an appointment pre-booked just in-case of one my family needs to see a doctor. I understand the need for new developments, however I believe my reasons needs to be considered.	The concerns about existing traffic problems around the Barnt Green area are noted.
SI11	180	Nicholas	Rands			I think the Council should consider allowing residential infill in rural locations. This would help towards the number of homes required, it would pepper-pot them throughout the district therefore increasing integration, it would give employment to local smaller house builders and individual tradesmen, it would provide accommodation to the rural community. If there were a requirement for 50% affordable homes on any individual site I think this would prevent the number of applications from being overwhelming. Another option would be to open applications for a limited period of time - similar to what has been done with agricultural building conversion applications.	Support for Option 4 is noted.



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SI11	192			Dodford with Grafton Parish Council		<p>No single approach is likely to work; we need a combination of city centre development to enhance that environment, some development on the boundaries with other districts (and especially those where employment is most likely), and perhaps one or two brand new developments, if only because brand new communities would need the basic infrastructure to be in place before any dwellings are erected. Piecemeal extension of the rural settlements would not be helpful, unless the dwellings were very carefully designed to fit into the existing environment and its 'feel,' and there would be a significant risk of destroying such communities if the roads, shops, surgeries, bus routes, etc were not in place first.</p> <p>There are many narrow lanes, often single track, which are increasingly being used by HGVs. Even two cars find it impossible to pass and invariably one must pull into a private drive or onto the pavement (where one exists). More passing places are needed in rural areas. There is local pressure for the introduction of speed limits on narrow lanes, but the question arises as to how and whether these could be enforced.</p> <p>The Green Belt per se is only important in preserving the natural environment, both for reasons of sustainability and for appeal to newcomers.</p>	Support for Options 1 and 5 is noted.
SI11	194	Darren	Oakley	RPS	Clients	<p>RPS suggests that further consideration should be given to additional growth options such as urban extensions/new settlements to the West Midlands Conurbation, given that this is the principal source of unmet housing need, in addition to those identified in figure 38 (p207) SGS.</p> <p>Based on the above conclusions set out in the SGS report, it is reasonable to conclude that Bromsgrove has a limited supply of land available from sources within its built-up areas to address future housing need. Furthermore, it is our view that the only logical means to deliver additional housing, as a contribution towards meeting unmet needs from neighbouring areas within the West Midlands Conurbation, is to allocate additional land well related to the existing built-up area of the Conurbation. This would then form the basis for a revised Spatial Strategy adopted through the Bromsgrove Development Plan, evidenced and supported through proper engagement with neighbours and clearly set out in a Statement of Common Ground.</p>	The additional growth options of urban extensions and new settlements to the West Midlands Conurbation are noted.
SI11	194	Darren	Oakley	RPS	Clients	<p>Garden Villages/New Settlements: In relation to the areas of search and addressing wider development needs of the Conurbation, the LP Review needs to have a focus on Green Belt parcels located towards areas that are more sustainably located to meeting the proportion of growth that relates to Birmingham. This can be most appropriately done around Birmingham's Conurbation urban edge, close to towns and villages with railway stations and key facilities and amenities and are well connected by public transport.</p> <p>The Local Plan Review needs to acknowledge that locations at the Conurbation edge that are extremely well connected to the Conurbation by virtue of excellent public transport linkages into the city and utilisation of existing infrastructure provision offer the unique opportunity and ability to deliver highly sustainable new settlements delivering garden city/village principles. Such a recognition would be entirely consistent with NPPF paragraph 72.</p>	Support for Options 5 and 2 is noted.
SI11	194	Darren	Oakley	RPS	Clients	<p>RPS would also make the general point that significant contributions towards meeting the unmet needs of the Conurbation would, in our opinion, be well related to the conurbation, which provides a good opportunity to integrate new development into existing built-up areas through utilising and enhancing infrastructure provision and most appropriately providing housing closest to where the need arises.</p>	Support for Option 5 in relation to meeting the conurbations wider housing needs.
<b>Q.SI12: Do you think the Plan Review should remove land from the Green Belt to be designated as 'safeguarded land', to meet longer term development needs beyond this Plan Review period? If so, how far ahead should we look?</b>							
SI12	1	Tammy	Williams	Alvechurch Parish Council		<p>"Development in waiting land", will be an invitation to developers to submit an application, because, they will say, the principle of development has been accepted already. Safeguarded land is indistinguishable from allocated land through a Green Belt review and Green belt policy seems to makes this irrational and confusing situation. A simple interpretation of the time period that a plan with green belt has to address in identifying safeguarded land is at least two plan periods, or 30–40 years according to the time lines of plans. There have been difficulties in development requirements for one plan period, the idea of trying to quantify land requirement for two plan periods seems daunting to say the least, and this alone will effectively stop local plans ever being adopted in a timely manner in locations where green belt exists.</p> <p>Our local planning authorities should make clear that any such set aside safeguarded land is not allocated for development in the current local plan time and that planning permission for development of safeguarded land will only be granted following the next Local Plan or green belt review.</p>	Comments are noted.
SI12	2	Gill	Lungley	Barnt Green Parish Council		No. Land should not be removed from the Green Belt and designated as safeguarded land.	Comments are noted.
SI12	4	Barry	Spence	Bentley Pauncefoot Parish Council		Please see the Parish Council's response on the Green Belt Assessment Methodology.	Comments are noted

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SI12	5	Kevin	Joynes	Beoley Parish Council		Don't feel that land should be identified as safeguarded land. Would encourage speculative planning applications. Better to have a shorter plan period so that needs can be considered more often.	Comments and concerns are noted.
SI12	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council have the view that using the 2016 figures for projected housing need would reduce the need for greenbelt development.	Comments are noted.
SI12	20	P	Harrison	Wythall Parish Council		The Plan review should be comprehensive and span the entire time period and also look ahead beyond the Plan period to provide certainty and to conform with the NPPF policy.	Support for designating Safeguarded land is noted.
SI12	28	Emily	Barker	Worcestershire County Council		If housing growth will be delivered through new settlements/significant extensions then safeguarding land beyond the plan period may be essential to enable future growth of these areas. If the Plan Period only extends to 2036 then safeguarding will provide guidance on future development, providing some certainty and preventing a piecemeal approach. Should assist in delivering high quality settlements that are well designed and masterplanned.	Support for designating Safeguarded land is noted.
SI12	30	Andrew	Peacock	Barnt Green Surgery		Do not agree with the use of Green belt land to be designated as 'safeguarded land'. The Green Belt is all that will prevent Birmingham spreading south to the M42.	Comments are noted.
SI12	33	Steve	Colella	District Councillor		History shows that previously identified Safeguarded land (ADR) was identified in the early 1990's. When they eventually came forward c2015 there was a widely held view that they were out of date and no longer sustainable, leading to mass objection. History could be repeated if safeguarded land is once again overtaken as a result of development around it and could become unsustainable or no longer fit for development such as the Cala ADR.	Comments are noted.
SI12	34	Sue	Baxter			Yes. The Green Belt Review should span the entire time period and also look ahead beyond the Plan period to provide certainty and to conform with the NPPF policy.	Support for designating Safeguarded land is noted.
SI12	35	Peter	King	Campaign to Protect Rural England		<p>Past experience suggests that the requirement of a full local plan review is too onerous a procedure to enable Safeguarded Land to be released. The old procedure was too rigid and long-windedly bureaucratic. The objective should be to devise a simple and relatively speedy procedure for releases of Safeguarded Land. Each year the Housing Land Supply is assessed in the Monitoring Report. NPPF requires a 5-year supply with a 5% or 20% margin. It is suggested that the Council should seek to retain an 8-years' (perhaps 10-years') supply of released land. About every three years, or when the supply fell close to the NPPF minimum, there would be a review:</p> <ul style="list-style-type: none"> <li>•The Council would determine the quantum of land to be released.</li> <li>•Developers would be invited to put forward sites of Safeguarded Land for release.</li> <li>•An assessment as to which were the most preferable sites would be undertaken.</li> <li>•Followed by a single consultation and an Examination.</li> </ul> <p>Hopefully, this whole procedure could be completed within a year and be followed by the adoption of a Land Allocations Plan.</p>	The comments relating to the release of safeguarded land to tie in with Housing Land Supply are considered to be inconsistent with NPPF Paragraph 139) c & d.
SI12	35	Peter	King	Campaign to Protect Rural England		We do not see the need to remove further land from the Green Belt within the Plan Period. It may be concluded that there needs to be some provision for land to be provided beyond 2036 to meet the speculative need identified by the Standard Methodology to 2041 or even 2046. If this is the case, it is preferable to release that land as Safeguarded Land, rather than take it out of the Green Belt. However a cautious approach needs to be adopted since the availability of Safeguarded Land in a future review may impact on the extent to which future options for urban brownfield redevelopment are pursued.	Comments are noted.
SI12	35	Peter	King	Campaign to Protect Rural England		Alternatively, the quantum of land to be released having been determined, the Council would also allocate this between settlements, encouraging there to be a review of Neighbourhood Plans (where existing) to release the additional land required. Where a Parish Council (or other Neighbourhood Plan authority) was diligently proceeding with its own review to make its own land allocation to meet its allocated target, the Neighbourhood Plan Area would be excluded from the district-wide review.	Comments are noted.
SI12	35	Peter	King	Campaign to Protect Rural England		Land can continue fulfilling the purposes of Green Belt, if it has the status of Safeguarded Land, particularly that of encouraging the reuse of derelict urban land. That purpose is the one that can only be judged in a Green Belt Review for the Green Belt as a whole, not for individual parcels, meaning that it is appropriate to treat it differently. This points a large release of Green Belt to Safeguarded Land and a relatively modest release to (immediately developable) white land or allocated housing or employment sites. It may also point to providing a buffer of Safeguarded Land beyond what is currently expected to be needed in the Plan Period. Nevertheless, it is important that such a bountiful strategy should not be allowed to make the district a victim for demand from nearby councils that have been more parsimonious in the provision.	Comments are noted.
SI12	36	Conrad	Palmer	Fairfield Village community Association		No. Plan for projected need within the time scale. Address additional land requirement with periodic Local Plan review.	Comments are noted

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SI12	38	Sue	Green	Home Builders Federation		The LPR should remove land from the Green Belt for designation as safeguarded land to meet longer term development needs beyond the LPR plan period.	Support for designating Safeguarded land is noted.
SI12	39	Andrew	Carter	Homes England		The use of safeguarded land allows the Plan to be more robust, and to look beyond the intended Plan period, or to extend the intended Plan period. It is felt that it is critical that future growth is planned for in both a flexible and robust manner.	Support for designating Safeguarded land is noted.
SI12	42			Wythall Residents Association		The Plan review should be comprehensive and span the entire time period and also look ahead beyond the Plan period to provide certainty and conform with the NPPF.	Comments are noted.
SI12	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Recommended that further suitable land is safeguarded to meet longer term development needs beyond the Plan Period. Regrettable to note para 4.25, which explains that removing land from the Green belt increases their profile and the potential for speculative planning applications and that this is described as the downside of safeguarding land. Strongly disagree with this statement as the very purpose of safeguarding land is to provide the mechanism for releasing sites from the Green belt for housing when existing allocations are failing to deliver. As a minimum it is considered that the District Plan Review should match this time period moving forward - a 29 year period up to 2050 based on the anticipated adoption in 2021.	Comments are noted, however it is considered that the purpose of safeguarded land has been wrongly interpreted by way of NPPF Paragraph 139 c & d.
SI12	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	Land should be removed from the Green Belt and safeguarded in order to meet the longer-term development needs stretching beyond the plan period (Paragraph 139). This will ensure the Council has sufficient flexibility to meet housing need in the future without the requirement to amend Green Belt boundaries.	Support for designating Safeguarded land is noted.
SI12	46	Ian	Mercer	Bruton Knowles	Church of England	It is both appropriate and necessary to remove land from the Green Belt and designate it as 'safeguarded land' to meet longer-term development needs beyond this Plan Review period.	Support for designating Safeguarded land is noted.
SI12	47	Michael	Jones	Caddick Land		The Local Plan should definitely designate sufficient areas of safeguarded land to help meet longer term development needs both of Bromsgrove District and neighbouring authorities especially the City of Birmingham which will continue to look to neighbouring authorities such as Bromsgrove to meet part of its unmet housing requirement. The period to allow will be a balance between the need to not have to redraw Green Belt boundaries in future Local Plans and being able to forecast the potential scale of development needs. A period of at least 30 years would represent a sensible balance.	Support for designating Safeguarded land is noted.
SI12	48	Grace	Allen	CBRE	Arden Park Properties	A policy coming forward on safeguarding land would need to be explicit in what it means for the land in question.	Comments are noted.
SI12	48	Grace	Allen	CBRE	Arden Park Properties	There would therefore appear to be limited merit in safeguarding land for release beyond the plan period if the sites which are safeguarded are small. NPPF paragraph 59 is clear that a sufficient amount and variety of land should come forward when needed to support the government's objective of significantly boosting the supply of homes. In order to appropriately plan for the housing requirement of the District and the wider HMA, land should be allocated now to meet that requirement. Additionally, in order for land to be released from the Green Belt, whether it be safeguarded or not, will be subject to the necessary site selection and examination process in a new Local Plan or Local Plan review and therefore its release for development cannot be guaranteed even if safeguarded now. If sites are appropriate for development, they should be released for such development.	Comments are noted.
SI12	48	Grace	Allen	CBRE	Arden Park Properties	Should the Council safeguard additional land through the new Local Plan, we consider that this should be of a strategic scale to show where the direction of growth is likely to go beyond the plan period without identifying specific smaller sites which may be released in the future. The amount of land required can be estimated by making an assumption on projected growth trends. The main purpose of safeguarding Green Belt land should therefore be to identify a spatial direction of future long term growth. For example, as mentioned above, safeguarding land for a potential new settlement would be appropriate should longer term housing needs require, thus enabling delivery in the next plan period.	The comments in relation to the scale of safeguarded land are noted.
SI12	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	In accordance with paragraph 139 of the NPPF (2018), it is our view that the Plan Review should consider removing land from the Green Belt to designate as "safeguarded land", which will enable the authority to plan for well beyond the Plan period.  However, in doing so, the council would only be able to protect this land from permanent development from proposals that would be contrary to the longer vision. Permission to use "safeguarded" land can only be granted following an update to the plan which proposes the development, and therefore to fully protect the council against speculative proposals (in the event of the supply of housing land dip below 5 years, it is preferable, in our view, to allocate a series of reserve sites. This way, those sites can come forward immediately (following planning consent) and will not be reliant upon a future lengthy plan review including another assessment of the Green Belt.	The comments in relation to the allocation of reserve sites so that supply is not reliant upon a plan review is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	50	Debbie	Farrington	Cerda Planning	The Trustees	In accordance with paragraph 139 of the NPPF (2018), it is our view that the Plan Review should consider removing land from the Green Belt to designate as “safeguarded land”, which will enable the authority to plan for well beyond the Plan period. However, in doing so, the council would only be able to protect this land from permanent development from proposals that would be contrary to the longer vision. Permission to use “safeguarded” land can only be granted following an update to the plan which proposes the development, and therefore to fully protect the council against speculative proposals (in the event of the supply of housing land dip below 5 years, it is preferable, in our view, to allocate a series of reserve sites. This way, those sites can come forward immediately (following planning consent) and will not be reliant upon a future lengthy plan review including another assessment of the Green Belt.	The comments in relation to the allocation of reserve sites so that supply is not reliant upon a plan review are noted.
SI12	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>Safeguarded land can demonstrate a sensible and flexible approach to ensure that delivery of sites can be guaranteed for the longer term, and also ensures that if there is a scenario which demonstrates significant failure to deliver, identified safeguarded land can be called upon to contribute towards the delivery requirements. It is acknowledged that due to the extensive Green Belt coverage of the District, that strategic release from the Green Belt will be required to ensure that a satisfactory number of sites can be identified to meet the arising need from the LPA area.</p> <p>It is important however that safeguarded land should form part of the development strategy of the emerging Local Plan alongside strategic allocations, to ensure that a flexible approach is adopted that does not inappropriately rely on one, single delivery mechanism that forms a key and fundamental component of the local plan’s development strategy. Safeguarded land should be a complementary part of the of the Plan and should sit beside those strategic allocations that should form a part of the aspiration of the Plan for delivery during the Plan period. Safeguarded land, designed for delivery beyond the Plan period, should only be called upon in the scenario where there is a serious and substantial need for it to be brought forward in the case where allocations have not been realised for any reason. In terms of the time to look forward beyond the Plan period, this is dependent on the extent of sites found for allocation in the context of sites that can be safeguarded. However, any further than 10 years from the end of the Period would demonstrate an inappropriate length of time, given the extent of land that would need to be found for safeguarding which would not demonstrate a sound approach in the Plan’s preparation.</p>	Support for designating Safeguarded land is noted. The comments relating to safeguarded land sitting alongside strategic allocations to form part of an aspiration for delivery during the Plan Period are considered to be problematic as this would then not constitute safeguarded land in accordance with NPPF Paragraph 139) c & d.
SI12	52	Tom	Ryan	Claremont Planning	Bellway Homes	It is important however that safeguarded land should form part of the development strategy of the emerging Local Plan alongside strategic allocations, to ensure that a flexible approach is adopted that does not inappropriately rely on one, single delivery mechanism that forms a key and fundamental component of the local plan’s development strategy. Safeguarded land should be a complementary part of the of the Plan and should sit beside those strategic allocations that should form a part of the aspiration of the Plan for delivery during the Plan period. Safeguarded land, designed for delivery beyond the Plan period, should only be called upon in the scenario where there is a serious and substantial need for it to be brought forward in the case where allocations have not been realised for any reason. In terms of the time to look forward beyond the Plan period, this is dependent on the extent of sites found for allocation in the context of sites that can be safeguarded. However, any further than 10 years from the end of the Period would demonstrate an inappropriate length of time.	Support for designating Safeguarded land is noted. The comments relating to safeguarded land sitting alongside strategic allocations to form a complementary part of the Plan are considered to be problematic as this would then not constitute safeguarded land in accordance with NPPF Paragraph 139) c & d.
SI12	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	It is important however that safeguarded land should form part of the development strategy of the emerging Local Plan alongside strategic allocations, to ensure that a flexible approach is adopted that does not inappropriately rely on one, single delivery mechanism that forms a key and fundamental component of the local plan’s development strategy. Safeguarded land should be a complementary part of the of the Plan and should sit beside those strategic allocations that should form a part of the aspiration of the Plan for delivery during the Plan period. Safeguarded land, designed for delivery beyond the Plan period, should only be called upon in the scenario where there is a serious and substantial need for it to be brought forward in the case where allocations have not been realised for any reason. In terms of the time to look forward beyond the Plan period, this is dependent on the extent of sites found for allocation in the context of sites that can be safeguarded. However, any further than 10 years from the end of the Period would demonstrate an inappropriate length of time, given the extent of land that would need to be found for safeguarding which would not demonstrate a sound approach in the Plan’s preparation.	Comments are noted, however it is considered that the purpose of safeguarded land has been wrongly interpreted by way of NPPF Paragraph 139 c & d.
SI12	54	Katherine	Ese	Claremont Planning	Miller Homes	Safeguarded land can demonstrate a sensible and flexible approach to ensure that delivery of sites can be guaranteed for the longer term, and also ensures that if there is a scenario which demonstrates significant failure to deliver, identified safeguarded land can be called upon to contribute towards the delivery requirements. Safeguarded land should be a complementary part of the of the Plan and should sit beside those strategic allocations that should form a part of the aspiration of the Plan for delivery during the Plan period.	Comments are noted, however it is considered that the purpose of safeguarded land has been wrongly interpreted by way of NPPF Paragraph 139 c & d.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	We suggest that a Green Belt Review should identify/safeguard land by its removal from the Green Belt (with agreed development 'terms') to meet longer term growth to at least 2041.	Support for designating Safeguarded land is noted.
SI12	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	The Green Belt Review should seek to establish boundaries which endure beyond the plan period to meet both current and longer term development needs. There is no reason for the review to seek to restrain the release of land to meet only the current housing numbers. A long term, comprehensive Green Belt review is required. Safeguarded land is recognised as a mechanism to remove land from the Green Belt in sustainable locations in order to properly plan for longer term growth and investment in infrastructure. Provided that the policy tools (including upfront comprehensive master planning to identify the 'end state' infrastructure and facilities which might be required for any strategic development area) are put in place to ensure that this does not result in piecemeal and speculative growth proposals within a safeguarded land area (and such policies are enforced through development management activity), then this approach is supported in order to facilitate long term comprehensive plan making and to provide certainty over future growth locations for local communities.	Support for designating Safeguarded land is noted. The comments relating to policy tools to reduce the likelihood of speculative planning applications are noted and agreed.
SI12	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	Yes. Appreciate concerns regarding sites coming forward earlier than planned, however, there is potential for that to occur currently in the event that the Council cannot show an adequate 5 year HLS. This will ensure the Local Authority retain control and lead in the location/direction of future growth and can plan appropriately with regards to infrastructure.	Support for designating Safeguarded land is noted.
SI12	63	Fiona	Lee-McQueen	Framptons	Bellway Homes	The Review Plan should look ahead to a point when it can meet its, and the Greater Birmingham HMA, housing numbers 'well beyond the plan period' (as set out in #139 point C of the NPPF).	Comments are noted.
SI12	64	Peter	Frampton	Framptons	Mr I Rowlesge	Yes, to avoid the requirement for excessive Green Belt reviews. The period reasonably could be extended to 2046.	Support for designating Safeguarded land is noted.
SI12	65	Louise	Steele	Framptons	Summix Ltd	With reference to NPPF para 139, the Review Plan should therefore look ahead to a point when it can meet its, and the Greater Birmingham HMA, housing numbers.	Comments are noted.
SI12	68	Nicole	Penfold	Gladmans		The LPR should identify and remove land from the Green Belt for designation as safeguarded land to meet the longer term development needs of the District.	Support for designating Safeguarded land is noted.
SI12	69	Latisha	Dhir	GVA	St Phillips	Recommends that land should be identified now and where necessary released to meet housing growth needs. The use of safeguarded land should only be adopted when sufficient land to meet the housing requirement over the plan period has been identified and where it is possible and feasible.	Support for designating Safeguarded land is noted.
SI12	72	Stephen	Peters			The Plan review should be comprehensive and span the entire time period and also look ahead beyond the Plan period to provide certainty and to conform with the NPPF policy.	Comments are noted.
SI12	75	Rachel	Mythen	GVA	Taylor Wimpey	Land should be identified now and, where necessary, released to meet housing growth needs. The use of safeguarding land should only be adopted when sufficient land to meet the housing requirement over the plan period has been identified, and where it is possible and feasible.	Comments are noted.
SI12	76	Emily	Vyse	GVA	University of Birmingham	Approximately 90% of the District is covered by Green Belt. If longer-term development needs beyond the plan period are not accounted for now, and the boundaries are only amended to accommodate the requirement up to 2036 or 2041, the Council will simply have to amend its Green Belt boundaries again during the next Plan Review. This would not be consistent with the provisions of the NPPF and would not be sound. It is critical to the success of the Plan that safeguarded land is identified in addition to Green Belt releases for development allocations. To provide an appropriate, long-term vision, and to satisfy the requirements of the NPPF, the Council should identify sufficient safeguarded land to accommodate development requirements for a full 15 years beyond the Plan period (i.e. such that the Plan provides for two full cycles). Whilst this might present significant challenges, once fixed, such a strategy will provide certainty in the long-term and will assist with infrastructure planning and development delivery, as well as enabling local people to properly understand how the District is likely to evolve.	Support for designating Safeguarded land is noted.
SI12	78	Sean	Rooney	Harris Lamb	Barratt Homes	Yes. Paragraph 136 of the NPPF should only be altered in exceptional circumstances and any changes to the GB boundaries should have regard to their intended permanence in the long term, so they can endure beyond the plan period. The further the council look ahead, the more land that would be required to be removed from the GB and safeguarded. We suggest that the council should look ahead at least to 2046. This would allow for two further Local Plans to take place before the issue of GB release would need to be looked at again.	Support for designating Safeguarded land is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	80	John	Pearce	Harris Lamb	Bloor Homes	<p>Yes.</p> <p>The Framework states at paragraph136 that Green Belt boundaries should only be altered where there are exceptional circumstances. These are considered to exist at the current time and which have necessitated a review of the Green Belt within the District. Paragraph 136 goes on to state that any changes to Green Belt boundaries should have regard to their intended permanence in the long term, so that they can endure beyond the plan period. As there is likely to be a need in the future to release further land from the Green Belt, the option to remove land from it, and safeguard it, for future development is one such way that would ensure the Council did not have to continually review the green Belt boundaries through successive Local Plan reviews. Paragraph 139 of the Framework states that when defining Green Belt boundaries, plans should identify areas of safeguarded land between the urban area and the Green Belt, in order to meet the longer-term development needs stretching well beyond the plan period. We, therefore, consider that removing land from the Green Belt now and safeguarding it for future development beyond the Plan Period is entirely consistent with national policy and that the Council should identify safeguarded land in the Local Plan review.</p>	Support for designating Safeguarded land is noted.
SI12	80	John	Pearce	Harris Lamb	Bloor Homes	<p>Whilst in principle we have no objection to the need to safeguard land for future development, in the case of Frankley, if the Council decide to remove it from the Green Belt, we contend that it should be allocated for development in this Plan, rather than safeguarding it for future development. Clearly if the Council decide to remove more land around BHW's control as part of the Green Belt review, we would not object.</p>	Comments are noted.
SI12	80	John	Pearce	Harris Lamb	Bloor Homes	<p>In terms of how far the Council should look ahead, we would suggest that they look ahead to at least 2046, as this would allow two further Local Plan reviews to take place before the issue of Green Belt release would need to be considered again, although as we said in our response to SI 1, there is also merit in looking to 2051, thereby providing a truly strategic approach to development in the District over a 30 year period.</p>	Comments in relation to the timeframe are noted.
SI12	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	<p>As there is likely to be a need in the future to release further land from the Green Belt, the option to remove land from it and safeguard it is one such way to ensure the Council does not have to review the Green Belt in successive local plans. We would suggest that the Council should look to meet the District's longer term needs and therefore look ahead to at least 2046.</p>	Comments relating to the timescale are noted.
SI12	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	<p>Yes. The lack of urban capacity is such that sufficient land for housing outside of the Green Belt is not available to meet the Council's own housing needs as set out in the adopted BDP. This position is not likely to change in the future with the only realistic option being to release further land from the Green Belt as part of future Local Plan reviews. As there is likely to be a need in the future to release further land from the Green Belt, the option to remove land from it, and safeguard it, for future development is one such way that would ensure the Council did not have to continually review Green Belt boundaries through successive Local Plan reviews. We, consider that removing land from the Green Belt now and safeguarding it for future development beyond the Plan Period is entirely consistent with national policy and that the Council should identify safeguarded land in the Local Plan review. In terms of how far the Council should look ahead, we would suggest that they look ahead to at least 2046, as this would allow two further Local Plan reviews to take place before the issue of Green Belt release would need to be considered again. Clearly in looking further ahead, this would require more land to be removed from the Green Belt and safeguarded than if the Council only looked to 2036 for example.</p>	Support for designating Safeguarded land is noted.
SI12	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	<p>Consider that removing land from the Green Belt now and safeguarding it for future development beyond the Plan Period is entirely consistent with national policy and that the Council should identify safeguarded land in the Local Plan Review.</p> <p>Suggest that they look ahead to at least 2046, as this would allow two further Local Plan Reviews to take place before the issue of Green Belt release would need to be considered again.</p>	Support for designating Safeguarded land is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	86	Rebecca	Anderson	Iceni Projects	Generator Developments	<p>We favour the idea to remove land from the Green Belt to be designated as “safeguarded land” as this avoids needing to carry out further Local Plan reviews and is planning proactively for the future.</p> <p>Paragraph 139 of the NPPF encourages strategic policies to look ahead to anticipate long term requirements and opportunities. Furthermore Paragraph 139 states that when defining Green Belt boundaries, plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the Plan period, with Paragraph 136 stating strategic policies should establish the need for any changes to the Green Belt boundaries, having regard to their intended permanence in the long term.</p> <p>In order to remove land from the Green Belt, this will depend on its quality which is assessed through a Green Belt review. The Council have yet to conduct a review of their Green Belt therefore removing land from the Green Belt and designating it as “safeguarded land” will provide a more realistic approach to meet longer-term development needs.</p>	Support for designating Safeguarded land is noted.
SI12	87			Indenture		A ten year period would appear fair and reasonable.	Comments relating to the timescale are noted.
SI12	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>The alternative, and our preferred approach, would be to release additional land from the Green Belt as part of the current Plan review and designate it as safeguarded land. This would mean that it would not be for immediate development, but that it could be released if required, for example through a Housing Delivery Test Action Plan during the emerging Plan period or in a future Plan review (without necessitating a further Green Belt assessment). Accordingly, such an approach would support the intended permanence of the Green Belt, as advocated by paragraph 136 of the NPPF, and avoid the need for a further review in the near future.</p> <p>As to the criteria set out in paragraph 139:</p> <p>1 Bromsgrove District Council has acknowledged that any of its identified development options would necessitate the release of some Green Belt land, and that a failure to do this would undermine its ability to meet its own housing need and contribute to meeting the unmet needs of the wider West Midlands sub-region.</p> <p>2 The Green Belt Purposes Assessment will provide a basis by which to ensure that the most sensitive parts of the Green Belt, and those that best serve the Green Belt purposes are safeguarded from development.</p> <p>3 Given the scale of the emerging housing need (and the unmet need from the wider area), such a forward-looking approach including safeguarded land is considered to be both appropriate and desirable in this location.</p> <p>4 It is accepted that the development of any such safeguarded land should be resisted in the short to medium term, and the relevant planning policies could be drafted accordingly.</p> <p>5 However, such an approach would be important in ensuring that the integrity of the Green Belt could be maintained beyond the Plan period. It would also be important in ensuring that it would not need to be amended as part of each and every Plan preparation process.</p> <p>In terms of the timescale over which to assess the need for safeguarded land, Taylor Wimpey suggests a period of 5 years beyond the emerging Plan period, i.e. to 2046. Based on current projections, this would result in the need to safeguard sufficient land to accommodate an additional 2,000 dwellings beyond the level of need identified for the Plan period.</p>	Comments are noted, however it is considered that the purpose of safeguarded land has been wrongly interpreted by way of NPPF Paragraph 139 c & d.
SI12	89	Reuben	Bellamy	Lone Star Land	Cleint	<p>it should be noted that safeguarded land cannot be used as reserve sites if there is a difficulty with the 5 year supply or housing delivery test. This is because paragraph 139 d) requires that it be made clear safeguarded land can only be released following an update to a local plan. Therefore, reserve sites should be allocated that the Local Authority could bring forward, if, for whatever reason, they fall behind on the 5 year supply target or the housing delivery test.</p>	The comments in relation to the allocation of reserve sites so that supply is not reliant upon a plan review is noted.
SI12	89	Reuben	Bellamy	Lone Star Land	Cleint	<p>Reference to NPPF paragraph 136 &amp; 139 (c).</p> <p>Therefore, given that green belt boundaries should have some sense of permanence safeguarded land should be allocated and it is suggested that ‘stretching well beyond the plan period’ should mean 10 years beyond the plan period.</p>	Support for designating Safeguarded land is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	90	Owen	Jones	LRM Planning	Persimmon Homes	In terms of NPPF #136, the clear and unambiguous expectation is that a new boundary must be defined in order to endure in the longer term in any event. This is separate from whether there is a formal “safeguarded land” designation then applied. The identification of safeguarded land is part of a positive approach to plan making because such a designation ensures that future development can be accommodated within the District whilst maintaining the permanence of the Green Belt in the longer term. It ensures that the new Green Belt boundary is capable of enduring beyond the plan period and gives a direction for future growth beyond the end of the plan period. On this basis, when defining the Green Belt boundary, we believe at the very least the boundary should be amended to allow for development needs beyond the end date of the Plan and that it would logically follow that areas of safeguarded land between the urban area and the Green Belt are identified to meet longer term development needs. On the basis that we believe the plan period should be at least 20 years, that relates to a period “stretching well beyond” 2041. There are sufficient development management policies that would ameliorate the concern the safeguarded land is subject to speculative applications in the short to medium term, and we do not consider this to be reason not to have such a designation.	Support for designating Safeguarded land is noted.
SI12	94			Nigel Gough Associates	Aniston Ltd	Consider that this option should be promoted, a 10 year period would appear fair and reasonable.	Support for designating Safeguarded land is noted.
SI12	95			Nigel Gough Associates	Monksgraston Ltd	Yes, we consider that this option should be promoted. A 10 year period would appear fair and reasonable	Support for designating Safeguarded land is noted.
SI12	96			Nigel Gough Associates	Mr Stapleton	Yes, we consider this option should be promoted. A 10 year period would appear fair and reasonable.	Support for designating Safeguarded land is noted.
SI12	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	Yes we consider this option should be promoted. A 10 year period would appear fair and reasonable.	Support for designating Safeguarded land is noted.
SI12	98	Sally	Oldaker			No – because of the downsides you have listed here.	Noted.
SI12	99	Mark	Dauncy	Pegasus	Gallagher Estates	It is necessary for the Council to release land from the GB to be designated as safeguarded land to meet development needs beyond the plan period. This will allow for GB boundaries to remain unaltered.	Support for designating Safeguarded land is noted.
SI12	100	Ryan	Bishop			I think it helps to identify areas of land to help planning and development of areas beyond the current view – I would suggest an additional 10 to 15 years on the plan to identify possible land for further analysis. This shouldn't be all consuming and take too much effort from the council – the over-riding objective here should be identifying and delivering a solid plan to deliver the current / immediate needs.	Support for designating Safeguarded land is noted.
SI12	103	Chris	May	Pegasus	Persimmon Homes	Over 90% of the area of Bromsgrove District lies within the Green Belt. The Council must, therefore, grapple with the issue of the identification of land to be released from the Green Belt on every occasion it prepares a development plan. The process the Council is embarking upon of conducting a Green Belt Review across the District will be a complex and contentious one. The nettle should be grasped at this juncture and, in addition to land being released for development needs within the plan period, land should also be identified and safeguarded for longer-term needs.	Support for designating Safeguarded land is noted.
SI12	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	To comply with Government policy the review must include safeguarded land where future needs indicate this.	Support for designating Safeguarded land is noted.
SI12	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Yes. In accordance with NPPF para 130, there is a need to ensure that Green Belt Boundaries have long term permanence, and so the current Plan should ensure that sufficient land is allocated to meet current need and potential future need through allocating safeguarded land. The potential requirement from the wider West Midlands Conurbation should also be allowed for in appropriate locations at this stage, given that the need has been defined in the Greater Birmingham HMA Strategic Growth Study (GL Hearn). Furthermore, housing supply should be increased to improve affordability. The period covered should be as long as possible, suggest 2046.	Support for designating Safeguarded land is noted.
SI12	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Agree with a safeguarded land approach. This will make the required reviews more straightforward and offer genuine options for the council if delivery rates from allocated sites reduce. This would also be aligned to the Housing Delivery Test, set out in Annex 1 of the NPPF.	Support for designating Safeguarded land is noted.
SI12	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	We agree with a safeguarded land approach, as suggested at SI13. This will make the required reviews more straightforward and offer genuine options for the council if delivery rates from allocated sites reduce. This would also be aligned to the Housing Delivery Test, set out in Annex 1 of the NPPF	Support for designating Safeguarded land is noted.
SI12	113	Gareth	Sibley	RCA Regeneration	CAD Square	We agree with a safeguarded land approach, as suggested at SI13 [sic]. This will make the required reviews more straightforward and offer genuine options for the council if delivery rates from allocated sites reduce. This would also be aligned to the Housing Delivery Test, set out in Annex 1 of the NPPF.	Support for designating Safeguarded land is noted.
SI12	115	John	Breese	Rosconn Strategic Land		The Plan Review should remove land from the Green Belt to be designated as “safeguarded land” to meet longer terms development needs. This approach is support by NPPF paragraph 136.  A period of at least 10 years beyond the Plan period is appropriate, as outlined by policy BDP4 Green Belt in the Bromsgrove District Plan 2011 – 2030.	Support for designating Safeguarded land is noted.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	The Council should seriously consider identifying safeguarded land as part of the review process - demographic pressure is only likely to increase in the future.	Support for designating Safeguarded land is noted.
SI12	119	Darren	Oakley	RPS Group	Gleeson	RPS broadly agree with the Council that identifying safeguarded land would be counter-productive to the main task of the review, which is to allocate sufficient land to address the Council's own shortfall as well as making a contribution towards the unmet needs of its neighbours as part of the Plan period.	Support for designating Safeguarded land is noted.
SI12	120	Michael	Davies	Savills	Cala Homes	BDC should allocate additional safeguarded land that could be delivered if any of the allocated sites do not come forward during the plan period	Comments are noted, however it is considered that the purpose of safeguarded land has been wrongly interpreted by way of NPPF Paragraph 139 c & d.
SI12	122	Michael	Davies	Savills	Landowners	We consider that BDC should allocate sufficient sites adjacent to existing settlements in order to meet the housing requirement of this plan period (once this is established). However, BDC should also allocate additional 'safeguarded land' that could be delivered if any of the allocated sites do not come forward during the plan period. This will ensure that BDC meet their housing requirement and provide enough flexibility for the delivery of BDC's housing requirement.	Comments are noted, however it is considered that the purpose of safeguarded land has been wrongly interpreted by way of NPPF Paragraph 139 c & d.
SI12	123	Michael	Burrows	Savills	Landowners	<p>BDC should allocate sufficient sites adjacent to existing settlements in order to meet the housing requirement of this Plan period.</p> <p>The Local Plan Review provides an early opportunity to comprehensively review Green Belt boundaries for the next Plan period and beyond.</p> <p>BDC should also allocate additional 'safeguarded land' that could be delivered: if any of the allocated sites do not come forward during the plan period; to assist with planning for meeting longer term housing needs beyond the Plan period; and / or to provide the first option for review to meet additional needs arising from undertaking the required periodic review of the Strategic Policies. Identifying safeguarded land on the edge of existing settlements in the District therefore improves the flexibility and deliverability of BDC's housing land supply.</p>	Support for designating Safeguarded land is noted.
SI12	125	Alastair	Thornton	Simply Planning	Woodpecker Plc	<p>Concerning safeguarded land (Q. S1.12) paragraph 33 of the NPPF is clear that 'Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future'.</p> <p>We would, therefore, question whether allocating safeguarded land will genuinely have the longevity, envisaged in national planning policy. Given the housing land supply situation efforts should focus on housing delivery in the short to medium term and at appropriate and sustainable locations.</p>	Comments are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	126	Rachel	Best	Stansgate Planning	Access Homes LLP	<p>The Plan review should remove land from the Green Belt to be designated 'safeguarded land'.</p> <p>As a Green Belt review is taking place and new Green Belt boundaries are being defined, it is necessary for the Council to identify as part of the review, 'safeguarded land' to meet longer term development needs to accord with guidance in the NPPF 2018.</p> <p>Bromsgrove District have been in this position before where no provision for safeguarded land was made at the time of the last Green Belt review in 1996. The Local Plan Inspector at that time made recommendations for safeguarded land to be identified before the plan could be adopted. Nothing has changed in government guidance, it still requires safeguarded provision to be made. Guidance in NPPF 2018 paragraph 133 says one of the essential characteristics of Green Belt is its permanence. Paragraph 139 goes on to state that when defining boundaries, local planning authorities should identify in their plans areas of 'safeguarded land' to meet longer term development needs stretching well beyond the plan period; and be able to demonstrate that Green belt boundaries will not be altered at the end of the plan period.</p> <p>Furthermore, the Inspector that examined the current Bromsgrove District Plan in 2016 found that as the cross boundary needs from the conurbation had not been confirmed, it was appropriate to adopt that Plan on a shortened timescale so as to allow for a single Green Belt review to take place once the cross-boundary need was confirmed and thereby avoiding multiple reviews.</p> <p>The Inspector said this would address the NPPF requirement that Green Belt boundaries should be considered having regard to their intended permanence in the long term, so they are capable of enduring beyond the plan period. He went on to recommend, a longer-term view is considered to be 10 years beyond the plan period.</p> <p>Therefore, government guidance in the NPPF 2018 and the views of the Bromsgrove District Plan Inspector are that there is a need to make provision for safeguarded land and longer-term should be 10 years beyond the plan period.</p>	Support for designating Safeguarded land is noted.
SI12	127	Rachel	Best	Stansgate Planning	AE Becketts and Sons Ltd	<p>As a Green Belt review is taking place and new Green Belt boundaries are being defined, it is necessary for the Council to identify safeguarded land as part of the review to meet longer term development needs.</p> <p>BDC has been in this position before where no provision for safeguarded land was made at the time of the last GB review (1996) Government guidance in the NPPF and the views of the BDP Inspector are that there is a need to make provision for safeguarded land and longer term should be 10 years beyond the plan period.</p>	Support for designating Safeguarded land is noted.
SI12	128	Rachel	Best	Stansgate Planning	J Rigg Construction Ltd	<p>The Plan review should remove land from the Green Belt to be designated 'safeguarded land'. Bromsgrove District have been in this position before where no provision for safeguarded land was made at the time of the last Green Belt review in 1996. The Local Plan Inspector at that time made recommendations for safeguarded land to be identified before the plan could be adopted. Nothing has changed in government guidance, it still requires safeguarded provision to be made.</p> <p>Furthermore, the Inspector that examined the current Bromsgrove District Plan in 2016 found that as the cross boundary needs from the conurbation had not been confirmed, it was appropriate to adopt that Plan on a shortened timescale so as to allow for a single Green Belt review to take place once the cross-boundary need was confirmed and thereby avoiding multiple reviews. Therefore, government guidance in the NPPF 2018 and the views of the Bromsgrove District Plan Inspector are that there is a need to make provision for safeguarded land and longer-term should be 10 years beyond the plan period.</p>	Support for designating Safeguarded land is noted.
SI12	129	Rachel	Best	Stansgate Planning	Midlands Freeholds Ltd	<p>The Plan review should remove land from the Green Belt to be designated 'safeguarded land'.</p> <p>Bromsgrove District have been in this position before where no provision for safeguarded land was made at the time of the last Green Belt review in 1996. The Local Plan Inspector at that time made recommendations for safeguarded land to be identified before the plan could be adopted. Nothing has changed in government guidance, it still requires safeguarded provision to be made.</p> <p>The Inspector that examined the current Bromsgrove District Plan in 2016 found that as the cross boundary needs from the conurbation had not been confirmed, it was appropriate to adopt that Plan on a shortened timescale so as to allow for a single Green Belt review to take place once the cross-boundary need was confirmed and thereby avoiding multiple reviews.</p> <p>The Inspector said this would address the NPPF requirement that Green Belt boundaries should be considered having regard to their intended permanence in the long term, so they are capable of enduring beyond the plan period. He went on to recommend, a longer-term view is considered to be 10 years beyond the plan period.</p>	Support for designating Safeguarded land is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	130	Rachel	Best	Stansgate Planning	Ms and Ms J Mondon Lines	<p>The Plan review should remove land from the Green Belt to be designated 'safeguarded land'.</p> <p>As a Green Belt review is taking place and new Green Belt boundaries are being defined, it is necessary for the Council to identify as part of the review, 'safeguarded land' to meet longer term development needs to accord with guidance in the NPPF 2018.</p> <p>Bromsgrove District have been in this position before where no provision for safeguarded land was made at the time of the last Green Belt review in 1996. The Local Plan Inspector at that time made recommendations for safeguarded land to be identified before the plan could be adopted. Nothing has changed in government guidance, it still requires safeguarded provision to be made. Guidance in NPPF 2018 paragraph 133 says one of the essential characteristics of Green Belt is its permanence. Paragraph 139 goes on to state that when defining boundaries, local planning authorities should identify in their plans areas of 'safeguarded land' to meet longer term development needs stretching well beyond the plan period; and be able to demonstrate that Green belt boundaries will not be altered at the end of the plan period.</p> <p>Furthermore, the Inspector that examined the current Bromsgrove District Plan in 2016 found that as the cross boundary needs from the conurbation had not been confirmed, it was appropriate to adopt that Plan on a shortened timescale so as to allow for a single Green Belt review to take place once the cross-boundary need was confirmed and thereby avoiding multiple reviews.</p> <p>The Inspector said this would address the NPPF requirement that Green Belt boundaries should be considered having regard to their intended permanence in the long term, so they are capable of enduring beyond the plan period. He went on to recommend, a longer-term view is considered to be 10 years beyond the plan period.</p> <p>Therefore, government guidance in the NPPF 2018 and the views of the Bromsgrove District Plan Inspector are that there is a need to make provision for safeguarded land and longer-term should be 10 years beyond the plan period.</p>	Support for designating Safeguarded land is noted.
SI12	131	Rachel	Best	Stansgate Planning Consultants Ltd	Mr N Meredith	<p>The Plan review should remove land from the Green Belt to be designated 'safeguarded land'.</p> <p>As a Green Belt review is taking place and new Green Belt boundaries are being defined, it is necessary for the Council to identify as part of the review, 'safeguarded land' to meet longer term development needs to accord with guidance in the NPPF 2018.</p> <p>Bromsgrove District have been in this position before where no provision for safeguarded land was made at the time of the last Green Belt review in 1996. The Local Plan Inspector at that time made recommendations for safeguarded land to be identified before the plan could be adopted. Nothing has changed in government guidance, it still requires safeguarded provision to be made. Guidance in NPPF 2018 paragraph 133 says one of the essential characteristics of Green Belt is its permanence. Paragraph 139 goes on to state that when defining boundaries, local planning authorities should identify in their plans areas of 'safeguarded land' to meet longer term development needs stretching well beyond the plan period; and be able to demonstrate that Green belt boundaries will not be altered at the end of the plan period.</p> <p>Furthermore, the Inspector that examined the current Bromsgrove District Plan in 2016 found that as the cross boundary needs from the conurbation had not been confirmed, it was appropriate to adopt that Plan on a shortened timescale so as to allow for a single Green Belt review to take place once the cross-boundary need was confirmed and thereby avoiding multiple reviews.</p>	Support for designating Safeguarded land is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	132	Rachel	Best	Stansgate Planning	Mrs L Bastable	<p>The Plan review should remove land from the Green Belt to be designated 'safeguarded land'.</p> <p>As a Green Belt review is taking place and new Green Belt boundaries are being defined, it is necessary for the Council to identify as part of the review, 'safeguarded land' to meet longer term development needs to accord with guidance in the NPPF 2018.</p> <p>Bromsgrove District have been in this position before where no provision for safeguarded land was made at the time of the last Green Belt review in 1996. The Local Plan Inspector at that time made recommendations for safeguarded land to be identified before the plan could be adopted. Nothing has changed in government guidance, it still requires safeguarded provision to be made. Guidance in NPPF 2018 paragraph 133 says one of the essential characteristics of Green Belt is its permanence. Paragraph 139 goes on to state that when defining boundaries, local planning authorities should identify in their plans areas of 'safeguarded land' to meet longer term development needs stretching well beyond the plan period; and be able to demonstrate that Green belt boundaries will not be altered at the end of the plan period.</p> <p>Furthermore, the Inspector that examined the current Bromsgrove District Plan in 2016 found that as the cross boundary needs from the conurbation had not been confirmed, it was appropriate to adopt that Plan on a shortened timescale so as to allow for a single Green Belt review to take place once the cross-boundary need was confirmed and thereby avoiding multiple reviews.</p> <p>The Inspector said this would address the NPPF requirement that Green Belt boundaries should be considered having regard to their intended permanence in the long term, so they are capable of enduring beyond the plan period. He went on to recommend, a longer-term view is considered to be 10 years beyond the plan period.</p> <p>Therefore, government guidance in the NPPF 2018 and the views of the Bromsgrove District Plan Inspector are that there is a need to make provision for safeguarded land and longer-term should be 10 years beyond the plan period.</p>	Support for designating Safeguarded land is noted.
SI12	133	Rachel	Best	Stansgate Planning	Mr C Detloff	<p>As a Green Belt review is taking place and new Green Belt boundaries are being defined, it is necessary for the Council to identify safeguarded land as part of the review to meet longer term development needs.</p> <p>BDC has been in this position before where no provision for safeguarded land was made at the time of the last GB review (1996) Government guidance in the NPPF and the views of the BDP Inspector are that there is a need to make provision for safeguarded land and longer term should be 10 years beyond the plan period.</p>	Support for designating Safeguarded land is noted.
SI12	134	David	Barnes	Star Planning	Richborough Estates	The National Planning Policy Framework is clear that when amending Green Belt boundaries such boundaries should endure beyond the plan period. Therefore, safeguarded land should be identified and this ought to be enough for a further 10 years' worth of employment and housing growth.	Support for designating Safeguarded land is noted.
SI12	136	Kathryn	Young	Turley	Land Fund	<p>In order that the LPR can "meet longer-term development needs stretching well beyond the plan period" it will be necessary that the existing Green Belt boundaries are the subject of a comprehensive review.</p> <p>Designating land as 'safeguarded land' will provide the Council with a mechanism for meeting it's established housing need if allocations do not deliver as anticipated. The LPR should remove land from the Green Belt to be designated as 'safeguarded land', doing so follows guidance established in the NPPF which states that any changes to Green Belt boundaries should have "regard to their intended permanence in the long term, so they can endure beyond the plan period." (para. 136)</p>	Support for designating Safeguarded land is noted.
SI12	137	Matthew	Fox	Turley	Redrow Homes	<p>Green Belt boundaries should be reviewed comprehensively through the LPR. Para. 139 of the NPPF states that when defining Green Belt boundaries it may necessary to identify areas of safeguarded land to meet longer-term development needs.</p> <p>Reviewing Green Belt boundaries as part of the LPR provides a prime opportunity to explore, evidence and justify any changes to Green Belt boundaries including safeguarded land to meet needs post-2036.</p>	Support for designating Safeguarded land is noted.
SI12	158	Henry	Birrell			Cofton Hackett's green belt is kept because it is used by migratory species and has historical value to the community. Cofton has already had development, why does it need more?	Comments are noted.
SI12	161	Ian	Macpherson		Self	yes - 30 years	Support for designating Safeguarded land is noted.
SI12	174	Michael	Corfield			The plan should not remove land from the Green Belt to be designated as 'safeguarded land'. It is not possible to know with certainty what the requirements will be in the distant future. Once land has been removed it won't be returned.	Comments are noted.
SI12	180	Nicholas	Rands			No.	Noted.
SI12	190	Philip	Ingram			The plan should remove land from the Green Belt for designation as safeguarded land to meet long term needs.	Support for designating Safeguarded land is noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI12	194	Darren	Oakley	RPS	Clients	RPS believe that a strong case exists for safeguarding land from the Green Belt. Bromsgrove has a long history of removing land from the Green Belt and safeguarding it for future use. Whilst local plans are to be reviewed every five years, this does not remove national policy (NPPF2 clear advice in paragraphs 136 and 139) requirements to ensure that Green Belt boundaries endure beyond the end of the plan period for longer term development needs. This is particularly important given current uncertainties regarding the scale of unmet needs associated with the Greater Birmingham Housing Market Area (GBHMA).	Support for designating Safeguarded land is noted.
<b>Q.SI13: What are your views on the approach taken in the Greater Birmingham Housing Market Area Strategic Growth Study (SGS)?</b>							
SI13	2	Gill	Lungley	Barnt Green Parish Council		The SGS is a flawed report in light of its original methodology and subsequent developments. Its recommendations took minimal account of the plans of communities it affected and their strategic fit. Subsequent to its publication, brownfield sites have become available and Birmingham's housing needs have decreased.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	9	Alexandra	Burke	Hagley Parish Council		A high level Joint Core Strategy to be agreed by the 14 LPAs of the Greater Birmingham and Black Country HMA, determining on a sub-regional basis a joint housing target for the whole HMA and how this should be divided up among the 14. This will require the 14 LPAs each to prepare a SHLAA on a consistent basis, ensuring that all prioritise undeveloped urban land in preference to Green Belt. Appears that housing target for Birmingham and Redditch are significantly in excess of the targets generated by the standard methodology. BDC should be taking an active position in opposing the inclusion of the Dudley South option in a future Dudley Plan or Black Country Core Strategy. Any encouragement to development in this armpit of the Green Wedge is liable to be followed by undesirable pressure to develop more of the Green Wedge, extending over the District Boundary into Hagley. Alvechurch/Barnt Green - Proposal would swamp them with a new settlement. Risk of continuous sprawl most of the way from Rubery almost to Bromsgrove. This option would probably require a new station at Blackwell. Wythall - Appears to suggest that Birmingham & Solihull would expand southwards - coalescence would be inevitable. Main blocks of development in Wythall are east of Alcester Road, but there is dispersed sprawl to the west. The Hollywood bypass would be a strong new boundary for the Green Belt. Bromsgrove southeast - Land in this area has the advantage of proximity to Bromsgrove Station with a frequent rapid train service to Birmingham City Centre. The railway station clearly makes this a sustainable location, from which people can commute to work in Birmingham. Makes it an appropriate place.	These comments are noted.
SI13	11	Rosamund	Worrall	Historic England		The consideration of a strategic green belt review as part of the SGS is welcomed, and should be used to establish the most sustainable pattern of development distribution within the West Midlands conurbation.	Comments are noted.
SI13	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council do not support the views of the SGS, we feel that it overestimates economic growth and housing need. We feel that it is likely that there will be an economic downturn in the future.	Comments are noted.
SI13	13			Natural England		We note that the council will need to consider the findings of the GL Hearn report. We also recommend that the council considers its ability to take a strategic approach to the deliver of the ecological networks, green infrastructure and net gain, in line with the refreshed NPPF and the Government's 25 Year Environmental Plan.	These comments are noted and agreed. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	20	P	Harrison	Wythall Parish Council		The Greater Birmingham Housing Market Area Strategic Growth Study was published in early 2018. Since that date the West Midlands Combined Authority has agreed a Second Devolution Deal with central Government identifying the delivery of 215,000 new homes by 2030/31. If this ambitious target can be achieved within the boundaries of the WMCA it will negate the need for expansion and new settlements within Bromsgrove District.  Consequently, the suggested options for growth within the SGS are no longer valid and little weight should be attached to it.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	21	Martin	Dando	Birmingham City Council		Birmingham City Council welcomes the inclusion of co-operating with the West Midlands conurbation to address wider development needs as a Strategic Issue. The Bromsgrove District Plan Review will need to have regard to the SGS by testing its conclusions to determine whether any elements can be incorporated into the final adopted Plan and, if not, provide the evidence to justify if another approach is to be taken.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	25	Gary	Palmer	Solihull Metropolitan Borough		The Council agrees that the Strategic Growth Study is an independent study. Each local authority within the Housing Market Area needs to test whether the approach put forward within the SGS is appropriate, and take into account local factors and their respective spatial strategy. Nevertheless it does set out the scale of the issue and that significant levels of land will need to be released from the Green Belt if the need is to be met.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	27			Stratford On Avon District Council		The 14 authorities within the GBHMA have prepared a Terms of Reference and an updated Position Statement in respect of the housing shortfall. The Bromsgrove Plan should reflect the latest agreed position. BDC must ensure that they deal proactively with exploring all reasonable options for assisting with meeting the housing shortfall from Greater Birmingham.	These comments are noted.
SI13	28	Emily	Barker	Worcestershire County Council		Need to have a clear vision on how cross boundary need is met and the infrastructure required. The SGS provides a useful starting point for proposals across the HMA. Further detailed study is required to determine: 1) The actual requirement 2) How the unmet need should be allocated throughout the HMA. Further detailed study is required to determine where this may be best located in terms of need, cannot be undertaken on an opportunistic basis of plan review periods. 3) Public transport route approach needs to be further refined to reflect available capacity and ability of routes to accommodate further growth. Also needs to reflect opportunities for and costs of investments 4) Housing is being considered in isolation and not in parallel with employment growth - inevitably create a further need for commuting into the conurbation. Prudent for a wider approach to be taken across the HMA.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	33	Steve	Colella	District Councillor		Clear and legally adopted housing needs in the WMCA should only be considered as a final direction from Government before any council agrees any commitment under the duty to co-operate. On the latest figures it appears they have over capacity to 2031 therefore inflicting doubt over Bromsgrove capacity capabilities and timelines. The final outcome should be that BDC factors in a contribution to WMCA housing centred on the Bromsgrove/Redditch growth point but to be back ended post 2040 and only then until the whole of WMCA is built out on its brown and greenfield sites and even then until vertical living is reintroduced as elsewhere in major world cities.	These comments are noted.
SI13	34	Sue	Baxter			The Greater Birmingham Housing Market Area Strategic Growth Study is out of date and does not take into account the latest devolution deal and money to build on brown field sites within WMCA. The options within it are no longer relevant.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	35	Peter	King	Campaign to Protect Rural England		The GL Hearn Study (SGS) is in some ways a helpful contribution to the debate, but it relies on the 2014 household figures and, as a result, may be exaggerating the level of housing need. Furthermore its approach to supply, particularly windfalls, conversions and potential urban supply from economic redevelopment and town centre renewal, along with some potential for increasing densities, suggest the need for other areas to accept overspill from Birmingham may be exaggerated. As a result by accepting that level of overspill housing, peripheral authorities may be undermining urban regeneration in the conurbation and allowing unsustainable patterns of growth to develop into the future.	Comments are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	35	Peter	King	Campaign to Protect Rural England		<p>If the conclusions of the Strategic Growth Study are correct, there is a need for new settlements which will all almost inevitably be dormitories for Birmingham and other commuters. Policies for rebalancing the economy between homes and employment in the outer zone are almost certainly bound to fail, without a degree of central planning of a kind only found where there is a totalitarian regime, something wholly alien to the British constitution.</p> <p>I submitted a paper analysing this in c.2013 in objecting to what ultimately became BDP. That was to a considerable extent dependent on data from the 2001 census, as the 2011 data was not then fully available, but I have no reason to suspect that the situation has changed in the slightest. No doubt your council can commission similar research based on more recent data.</p> <p>If the New Plan is based on more appropriate evidence as the economic geography of the district a more appropriate and sounder plan is likely to emerge.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	36	Conrad	Palmer	Fairfield Village community Association		SGS addressed expected growth across the Greater Birmingham Market Area. Utilising existing infrastructure hubs appears to be a sensible proposition. As with the establishment of New Towns, such as Redditch, there is a need to consider establishing new settlements. The plan did not propose small scale development that will revitalise struggling rural neighbourhoods.	Comments are noted and will also be considered in relation to the growth option responses.
SI13	38	Sue	Green	Home Builders Federation		<p>The Birmingham Development Plan adopted in January 2017 identifies an unmet need of 37,900 dwellings for the plan period 2011 – 2031. The meeting of this unmet housing need is a strategic cross boundary matter which should be addressed by the Greater Birmingham HMA authorities. The meeting of unmet needs should be set out in a SoCG signed by all respective Greater Birmingham HMA authorities. The Council should not sign any bilateral agreements concerning contributions towards meeting unmet needs because there is no certainty that the overall combined sum of bilateral agreements will meet the unmet needs in full of the HMA.</p> <p>The inter relationship between the LPR and the Greater Birmingham &amp; Black Country HMA Strategic Growth Study should be clearly stated and transparent.</p>	These comments are noted as is the requirement set out in the NPPF for a Statement of Common Ground.
SI13	39	Andrew	Carter	Homes England		<p>The Growth Study takes a strategic view of the housing needs in the HMA up to 2036. This joint working approach and collaboration of information is critical to the multiple local authorities within the HMA agreeing an apportionment of housing growth. As yet there is no clear methodology of how the growth will be apportioned, however it is reasonable to assume that some of the houses will need to be accommodated within Bromsgrove District.</p> <p>The Study undertook a land parcel assessment approach to the West Midlands green belt, reviewing the strategic importance of each parcel. It is felt that this methodology is a useful starting point for Bromsgrove's strategic review of green belt land which may need to be released in the exceptional growth circumstances.</p>	Comments are noted and the GBPAM included an overview of how this land parcel assessment has been taken into account.
SI13	42			Wythall Residents Association		<p>Since the Greater Birmingham Housing Market Area Strategic Growth Study was published in 2018, the West Midlands Combined Authority has agreed a Second Devolution Deal with central Government identifying the delivery of 215,000 new homes by 2030/31. If this ambitious target can be achieved within the boundaries of the WMCA it will negate the need for expansion and new settlements within Bromsgrove District.</p> <p>Consequently, the options for growth within the SGS are no longer valid.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	An urban extension should be the preferred approach to identifying and allocating suitable land towards meeting the unmet needs of the District and nearby neighbours, near to the identified need. This is the most sustainable location for new development due to the presence of existing utilities, infrastructure, facilities and services. We would question the ability of a new settlement in providing a significant contribution towards housing need over the Plan Period. Given the lead in times associated with the planning and delivery of a new settlement, it is considered unlikely to deliver dwellings for at least 10 years. Recommend that priority be given to urban extensions to accommodate housing need. Welcome the findings of the SGS insofar that it identifies the Site as a logical and suitable location for a sustainable urban extension.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	The meeting of unmet need is a strategic cross-boundary matter which should be addressed by all the HMA authorities. The meeting of these needs should be set out in a signed Statement of Common Ground to provide certainty and the required housing numbers. The requirement in the SGS should be used as the minimum amount needed and the Council should allocate sufficient land to ensure they absorb a suitable amount.	Comments are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	47	Michael	Jones	Caddick Land		The SGS was primarily undertaken to help determine the proportion of Birmingham's housing requirement which can't be provided within the City, that should be apportioned between the Districts in the Birmingham HMA. It was never intended to be a robust analysis of how development should be located within each Authority area as it was far too strategic in nature. It cannot be relied upon to justify the approach to growth and Green Belt release within Bromsgrove District.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options as well as a District wide Green Belt Boundary Review.
SI13	48	Grace	Allen	CBRE	Arden Park Properties	The GBBCHMA Strategic Growth Study (SGS) does not identify a specific number of dwellings which each LPA should be seeking to provide to contribute towards meeting the housing shortfall of the conurbation. It recommends an 'area of search' for Bromsgrove which could comprise a new settlement of 10,000+ dwellings between Birmingham and Bromsgrove / Redditch. The SGS also suggests that 'proportionate dispersal' and other small-scale development opportunities will contribute towards the shortfall, both within and beyond the Green Belt, through Local Plans and Green Belt reviews. The study does not identify how much 'proportionate dispersal' or small-scale sites (<1,500 dwellings) should contribute towards, however Bromsgrove should test whether any smaller scale sites are suitable to contribute towards this.	These comments are noted and will be taken into account during options development.
SI13	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	The greater Birmingham housing market area strategic growth study (GL Hearn) carried out on behalf of the 14 local authorities comprising the greater Birmingham and Black Country housing market area is an objective study putting forward options for the location of new development to accommodate Birmingham's housing shortfall of 37,900 dwellings and Black Country authorities combine shortfall of up to 22,000 dwellings. It identifies 24 broad locations and a further 11 for further analysis – all locations have been subjected to a high-level sustainability and infrastructure assessment. It considers new settlements major developments urban extensions and proportionate dispersal within developments of 500 dwellings or more. It concludes that large scale development will take time to bring forward and there will be circumstances where smaller scale development might be accommodated in the greenbelt and where there would be pressure to deliver development to meet needs in the short to medium term. One of the options recommended for Bromsgrove is the delivery of a new settlement which would be located between Bromsgrove and Birmingham. The report makes it clear that part of rail corridors between Birmingham and Bromsgrove and Birmingham and Redditch could be the focus for extensive development it is however noted that part of these corridors particularly around Barnt Green are identified as making a principal contribution to greenbelt purposes being part of the separation between Birmingham and Bromsgrove. Option 7 of the emerging plan will test the creation of a new settlement which would align with the GBBS. However, this is not an option that we consider should be supported due to the impact on the Green Belt and the likely coalescence with adjoining built up areas. The report also identifies locations where potential proportionate dispersal could be supported in greenbelt locations to the south of Bromsgrove. This element of the report is supported and would also align with options 2,3 and 4 currently proposed within the emerging plan. Whilst this study provides an understanding of the opportunities that may exist in relation to fulfilling housing need across the study area, it has no formal planning status. It is useful in as much as that it has to some extent tested options for growth and gives some real options for councils to consider, accept or justify alternatives. Shortly after its publication, authorities were keen to distance themselves from it – Bromsgrove has stated that the council does not accept the findings of the study but will use the consultation process to ascertain the views of residents and other interested parties.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>The high-level Strategic Growth Study provided a wide picture of development pressures arising from the Greater Birmingham HMA and how this could impact the overall area. Such a high level assessment provides a robust platform to work from and can provide robust evidence for the emerging Bromsgrove Plan to work with. However, given that the Plan has not provided suitable consideration of the consequences of this high level study, the Plan has not been appropriately provided options that following similar recommendations made by the Study. Whilst the Plan acknowledges that residential development will be required on undeveloped land in the District, it has not provided through the Plan as to options for this delivery. The Plan remains distinctly at odds with the conclusions of the high level study and whilst it is not a statutory document, it provides significant comments that should form a fundamental part of how the emerging Plan should be taken forward. Without due recognition of the development pressures from the conurbation and how they will affect the development strategy of the emerging Local Plan, it cannot be demonstrated that the Plan has been positively prepared and is able to meet the statutory requirements of the Duty to Cooperate.</p> <p>If the Plan is to establish appropriate recognition of the study, the Plan should demonstrate how it is positively engaging with the conclusions of the study and these can be possibly incorporated into the spatial strategy of the new Plan. At present, the Plan does not present this positively and as such does not meet the requirements of the NPPF where it stipulates the positive preparation of Local Plans. In the context of Bromsgrove, the Plan risks being found ineffective in regard to how it is to engage with the unmet need arising from Greater Birmingham and without allowing the study to inform emerging strategy, the Plan will be unable to fully make use of the findings of this study and practically, and positively, enable them to inform the strategy of the Plan.</p>	These comments are noted. However the Issues and Options Paper is the first stage in identifying the potential issues that will inform the Plan Review and should not be interpreted as the Development Plan itself.
SI13	52	Tom	Ryan	Claremont Planning	Bellway Homes	<p>Given that the Plan has not provided suitable consideration of the consequences of this high level study, the Plan has not been appropriately provided options that following similar recommendations made by the Study. Whilst the Plan acknowledges that residential development will be required on undeveloped land in the District, it has not provided through the Plan as to options for this delivery. The Plan remains distinctly at odds with the conclusions of the high level study and whilst it is not a statutory document, it provides significant comments that should form a fundamental part of how the emerging Plan should be taken forward. Without due recognition of the development pressures from the conurbation and how they will affect the development strategy of the emerging Local Plan, it cannot be demonstrated that the Plan has been positively prepared and is able to meet the statutory requirements of the Duty to Cooperate.</p> <p>The Plan should demonstrate how it is positively engaging with the conclusions of the study and these can be possibly incorporated into the spatial strategy of the new Plan.</p>	These comments are noted. However the Issues and Options Paper is the first stage in identifying the potential issues that will inform the Plan Review and should not be interpreted as the Development Plan itself.
SI13	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	<p>The high level Strategic Growth Study provided a wide picture of development pressures arising from the Greater Birmingham HMA and how this could impact the overall area. Such a high level assessment provides a robust platform to work from and can provide robust evidence for the emerging Bromsgrove Plan to work with. However, given that the Plan has not provided suitable consideration of the consequences of this high level study, the Plan has not been appropriately provided options that following similar recommendations made by the Study. Whilst the Plan acknowledges that residential development will be required on undeveloped land in the District, it has not provided through the Plan as to options for this delivery. The Plan remains distinctly at odds with the conclusions of the high level study and whilst it is not a statutory document, it provides significant comments that should form a fundamental part of how the emerging Plan should be taken forward. Without due recognition of the development pressures from the conurbation and how they will affect the development strategy of the emerging Local Plan, it cannot be demonstrated that the Plan has been positively prepared and is able to meet the statutory requirements of the Duty to Cooperate.</p> <p>If the Plan is to establish appropriate recognition of the study, the Plan should demonstrate how it is positively engaging with the conclusions of the study and these can be possibly incorporated into the spatial strategy of the new Plan. At present, the Plan does not present this positively and as such does not meet the requirements of the NPPF where it stipulates the positive preparation of Local Plans. In the context of Bromsgrove, the Plan risks being found ineffective in regards to how it is to engage with the unmet need arising from Greater Birmingham and without allowing the study to inform emerging strategy, the Plan will be unable to fully make use of the findings of this study and practically, and positively, enable them to inform the strategy of the Plan.</p>	These comments are noted. However the Issues and Options Paper is the first stage in identifying the potential issues that will inform the Plan Review and should not be interpreted as the Development Plan itself.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	54	Katherine	Else	Claremont Planning	Miller Homes	Given that the Plan has not provided suitable consideration of the consequences of this high level study, the Plan has not been appropriately provided options that following similar recommendations made by the Study. Whilst the Plan acknowledges that residential development will be required on undeveloped land in the District, it has not provided through the Plan as to options for this delivery. If the Plan is to establish appropriate recognition of the study, the Plan should demonstrate how it is positively engaging with the conclusions of the study and these can be possibly incorporated into the spatial strategy of the new Plan. At present, the Plan does not present this positively and as such does not meet the requirements of the NPPF where it stipulates the positive preparation of Local Plans.	These comments are noted. However the Issues and Options Paper is the first stage in identifying the potential issues that will inform the Plan Review and should not be interpreted as the Development Plan itself.
SI13	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	We support the need to co-operate with the West Midlands Conurbation to address the development needs of the wider area. The SGS is one of several pieces of evidence which will be used to inform growth decisions for the Bromsgrove local plan.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	Welcome the Council's acknowledgement of the need for cross boundary co-operation under the DTC and the requirement for the removal of land from the Green Belt to accommodate the needs of the HMA. Unclear what level of provision the Council considers to be appropriate at this stage to assist the wider HMA. We consider it is appropriate to provide sufficient housing to meet the needs of Bromsgrove and give consideration to the needs of the wider HMA including Redditch. We support the identification of land on the edge of Birmingham to accommodate residential development during the plan period as this is a sustainable location with excellent transport links and services and facilities within close proximity.	Comments are noted.
SI13	63	Fiona	Lee-McQueen	Framptons	Bellway Homes	The Greater Birmingham Housing Market Area Strategic Growth Study (February 2018) and Position Paper (September 2018) provide a strategic overview which should be considered during the preparation of the Plan Review.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	65	Louise	Steele	Framptons	Summix Ltd	The Greater Birmingham Housing Market Area Strategic Growth Study provides a strategic overview which should be considered during the preparation of the Plan Review. However, the correct approach is to examine Bromsgrove Green Belt against the Council's own assessment criteria and smaller parcels of land needs to be considered.	These comments are noted and agreed. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	68	Nicole	Penfold	Gladmans		There should be a Statement of Common Ground signed by all the LPAs outlining the contributions to meeting the 37,900 unmet need arising from the GBHMA. The interrelationships between the LPR and the SGS need to be clear and transparent within the LPR.	These comments are noted as is the requirement set out in the NPPF for a Statement of Common Ground.
SI13	69	Latisha	Dhir	GVA	St Phillips	If the Council do not take into account the results of the study, the level of housing growth required will not be met, which will have significant adverse impacts across the wider HMA.	Comments are noted.
SI13	72	Stephen	Peters			The Greater Birmingham Housing Market Area Strategic Growth Study was published in early 2018. Since that date the West Midlands Combined Authority has agreed a Second Devolution Deal with central Government identifying the delivery of 215,000 new homes by 2030/31. If this ambitious target can be achieved within the boundaries of the WMCA it will negate the need for expansion and new settlements within Bromsgrove District.	These comments are noted.
SI13	75	Rachel	Mythen	GVA	Taylor Wimpey	It is clear that this study forms an independent review which the Council will need to take into account in identifying their considered options going forward. The results of this study demonstrate that the principle of development within this location of the District is supported due to its sustainability credentials, particularly access to public transport networks. Notwithstanding this, the SGS is not an adopted policy document, nor it is a material consideration with regard to decision making, and as such should be given limited weight. When considering sites for residential development, BDC should have regard to their own evidence base, and consider options put forward in the SGS against all other options and how they perform when assessed against the Council's Green Belt Assessment and Sustainability Appraisal. Bromsgrove District Council should have regard to the unmet needs arising from the wider HMA in considering its options in the Local Plan Review. Unless this is achieved, it is highly likely that the new Local Plan will be found unsound and the Duty to Cooperate will not met. It is also a risk that, if the Council do not take into account the results of this study, that the level of housing growth required will not be met, which will have significant adverse impacts across the wider HMA.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	76	Emily	Vyse	GVA	University of Birmingham	The Authors' assessment of development options beyond the Green Belt is very basic and, by their own admission, has had no regard to infrastructure requirements, land availability and deliverability. Moreover, because looking beyond the Green Belt means distancing development from where the need for it arises, the areas of search that the Authors identified occupy 10 of the 11 most remote spots in the HMA. This begs questions about sustainability (e.g. impacts linked to increased travel in particular) and connectivity (bearing in mind that most of the areas of search are linked to the conurbation by heavily congested road and rail networks).	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	76	Emily	Vyse	GVA	University of Birmingham	For the purposes of establishing the baseline housing land supply position, the Study indicates that the HMA Authorities have looked again at their urban capacity in an effort to identify as much deliverable and developable housing land as possible. The details of these assessments have not been released and so cannot be interrogated. This is unfortunate as (i) the stated supply has a significant impact on the scale of 'shortfall' that needs to be accommodated beyond the Conurbation and (ii) results in a much lower shortfall than most were expecting bearing in mind that Birmingham City Council and the Black Country authorities had calculated their own shortfalls at just under 40,000 (to 2031) and 22,000 (to 2036) respectively. The disconnect between the previously stated shortfalls and the shortfall quoted in the Study requires further explanation and evidence;	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	76	Emily	Vyse	GVA	University of Birmingham	If, notwithstanding (b), the assessments conducted by the Authorities are sound and have exhausted all known and anticipated supply, the Authors' assertions in respect of windfalls (15,000 – 29,000 dwellings) appear to us to be wildly optimistic.	Comments are noted.
SI13	76	Emily	Vyse	GVA	University of Birmingham	We note that, to a degree at least, the SGS has attempted to temper the effects of optimism by applying non-implementation discounts. However, so far as we can tell, there is no evidence-based rationale for the levels of discount that have been applied and the 5% applied to sites with planning permission appears particularly low. If the discounts that have been applied are too low, the supply will again have been artificially inflated. The combined effect of (a) - (d) is likely to be a starting position (the scale of shortfall quoted) that is significantly under-stated. This has potentially serious ramifications for the reliability of the rest of the study.	Comments are noted.
SI13	76	Emily	Vyse	GVA	University of Birmingham	The Authors have considered whether additional housing could be accommodated within the urban areas if the constituent Authorities were to insist on higher densities on sites which do not yet have planning permission. They have concluded that if a minimum density of 40 dwellings per net hectare is achieved within Birmingham and the Black Country and a minimum of 35 dwellings per net hectare is achieved in the rest of the HMA, the identified land supply could contribute an additional 13,000 new homes. Moreover, there has been no evidence produced which explains why the initial capacity estimates produced by the HMA Authorities are inappropriate. On the basis of the analysis that the Authors have presented, it appears likely that more could be made of the identified supply than currently forecast by the Authorities. However, whether this has the ability to deliver an additional 13,000 dwellings is far from clear.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	76	Emily	Vyse	GVA	University of Birmingham	We are concerned about the way in which the Study focuses on the minimum level of housing that needs to be delivered in the HMA. Whilst the Authors encourage the Authorities to do more than the minimum, and identify sound and compelling reasons for doing so, the Study goes on to focus on the implications of doing the bare minimum. This, in our view, is inappropriate.	Comments are noted.
SI13	78	Sean	Rooney	Harris Lamb	Barratt Homes	Whilst we generally welcome the findings of the SGS, the report does have a number of shortcomings. Principally it is non binding on any of the constituent authorities in terms of the areas of search for any new strategic development sites. The SGS is not a SHMA and therefore there is a significant question mark over the housing need figure that has been used when calculating the housing need figure. We have significant reservations over the work that was done in respect of increasing densities in order to increase supply on existing sites or allocations. We found this to be too crude an exercise.  Notwithstanding the reservations we have set out above, the SGS does identify land to the south of Bromsgrove town as a proportionate dispersal site, and therefore we are supportive of this.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	78	Sean	Rooney	Harris Lamb	Barratt Homes	<p>The SGS confirmed that there is a significant shortfall to meet the needs of the Greater Birmingham HMA and that and the release of a significant quantum of land from the Green Belt is necessary if the full housing needs are to be met. The SGS does defer the decision down to the individual decisions as to how and where they will meet their housing needs and where they may release land from the Green Belt.</p> <p>The SGS is not a SHMA and therefore there is a significant question mark over the housing need figure that has been used when calculating the shortfall. The SGS does identify land to the south of Bromsgrove Town as a proportionate dispersal site and therefore we are very supportive of this. The SGS is therefore an evidence base document that the council should have regard to.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	79	Shamim	Brown			Clearly a great housing need will arise in the area. Particularly when HS2 is up and running it is expected that the West Midlands will have a greater housing need. Building cannot all be in the Birmingham centre and suburbs. It has to cater for preferences. Therefore, whilst much of the population choose city centre living, a significant proportion prefer rural living. Inevitably this will require development on Greenbelt. Careful selection of greenbelt sites is possible to choose sites on the outskirts of existing settlements. Sympathetic design and low density can reduce the visual impact. I would be in favour of allocating some greenbelt to development if it is adjacent to existing settlements.	Comments are noted.
SI13	80	John	Pearce	Harris Lamb	Bloor Homes	In conclusion, the SGS is an evidence base document, and one that the Council should have regard to in the preparation of the Local Plan review, subject to our further comments. It confirms that there is a shortfall in supply of housing land against need, albeit that the full extent of this is yet to be established. Finally, having confirmed there is an issue, the SGS does not make any firm conclusions on how these unmet needs are to be met and where Birmingham's need are to be accommodated, deferring this issue again to a later date.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	80	John	Pearce	Harris Lamb	Bloor Homes	The SGS or GL Hearn Report raised a number of interesting issues across the Greater Birmingham area that are relevant to the preparation of the Local Plan review. Principally, it confirmed that there is a significant shortfall in the availability of land to meet the housing needs of Greater Birmingham and, that, if the full housing needs are to be met, then this will necessitate the release of a significant quantum of land from the Green Belt to do so. In light of BHW's interests both at Frankley and across the District, the conclusions of the SGS are welcomed as they confirm that sufficient urban land is not available to meet the housing needs of the HMA. Furthermore, the SGS identifies a number of locations that were suggested as warranting further search to identify potential strategic development opportunities.	Comments are noted.
SI13	80	John	Pearce	Harris Lamb	Bloor Homes	Notwithstanding the above, the non-binding nature of the SGS and the need for local authorities to identify proportionate dispersal sites in the Green Belt in sustainable locations supports the need to consider locations such as Frankley through the Green Belt review and Local Plan review. Furthermore, the Birmingham shortfall is not mentioned in the SGS, let alone how this is to be addressed or what proportion of the unmet need should be accommodated within the relevant authorities.	Comments are noted.
SI13	80	John	Pearce	Harris Lamb	Bloor Homes	We have significant reservations about the work that was undertaken in respect of increasing densities in order to base increase supply on existing sites or allocations. At best this was a crude exercise that in out view over simplified and over stated the contribution that it could make. Whilst clearly there are certain sites where an increase in density could be achieved and which will result in additional supply, the blanket one size fits all approach described in the Report would not in our view deliver anywhere near the increase in numbers that the SGS said it would.	Comments are noted.
SI13	80	John	Pearce	Harris Lamb	Bloor Homes	The SGS is an evidence base document and whilst it made recommendations to the 14 HMA authorities as to where they could search for additional sites or areas of growth, the Report was clear that its conclusions and recommendations were non-binding. In lights of this, the SGS defers the decision down to the individual authorities as to how and where they will meet their housing needs, and where they may release land from the Green Belt. The land at Frankley was not one of the 25 areas of search that were assessed in the SGS, and consequently it is not an area that was recommended for further investigation.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	<p>We are generally supportive of the approach however the SGS does defer the decision down to individual local authorities as to how and where they will meet housing needs and where they may release land from Green Belt. The SGS does have a number of shortcomings, principally it is non-binding on any of the authorities in terms of areas of search for strategic scale development sites.</p> <p>The SGS is not a SHMA and therefore there is significant question mark over the housing need figure that has been used when calculating the shortfall.</p> <p>We have significant reservations about the work that was undertaken in respect of increasing densities in order to increase supply on existing sites or allocations. It was too crude an exercise and we do not agree that this blanket approach would actually deliver anywhere near the increase in numbers claimed.</p> <p>Notwithstanding these reservations, the SGS does identify land to the south of Bromsgrove town as a proportionate dispersal site and we are very supportive of this. The SGS is an evidence base document and one the Council should have regard to.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	<p>An evidence base document such as the SGS that states that Green Belt land will be required to meet future housing needs is welcomed. However, the SGS does defer the decision down to the individual authorities as to how and where they will meet their housing needs, and where they may release land from the Green Belt. In light of the SGS, we welcome the Council's intention to undertake a Green Belt in order to meet its future housing needs.</p> <p>Whilst we generally welcome the findings and conclusions of the SGS, we consider that the report does have a number of shortcomings. Principally, it is non binding on any of the constituent authorities in terms of the areas of search for new strategic development sites. These are only suggestions, with no compulsion on any of the authorities to advance these further. Furthermore, the Birmingham shortfall is not mentioned in the report, let alone how this is to be addressed or what proportion of the unmet need should be accommodated within the relevant authorities. Similarly, the shortfall that has been identified is based on existing housing requirements in adopted or emerging Local Plans. The SGS is not a SHMA and therefore, there is a significant question mark over the housing need figure that has been used when calculating the shortfall.</p> <p>We have significant reservations about the work that was undertaken in respect of increasing densities in order to increase supply on existing sites or allocations. We found this to be too crude an exercise base and whilst, clearly there are certain sites where an increase in density could be achieved, we do not agree that this blanket approach would actually deliver anywhere near the increase in numbers that the SGS said it would.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	<p>Welcome the Council's intention to undertake Green Belt Review in order to meet its future housing needs. Generally welcome the SGS findings but consider it has shortcomings. It is non binding on any of the constituent authorities in terms of the areas of search for new strategic development sites. The Birmingham Shortfall is not mentioned in the report, let alone how this is to be addressed or what proportion of the unmet need should be accommodated within the relevant authorities. The SGS is not a SHMA and therefore, there is a significant question mark over the housing need figure that has been used when calculating the shortfall.</p> <p>Significant reservations about the work that was undertaken in respect of increasing densities in order to increase supply on existing sites. Too crude and do not agree that this blanket approach would actually deliver anywhere near the increase in numbers that the SGS says it would.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.

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SI13	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>Strategic Issue 5 identifies Bromsgrove District as part of the Birmingham and Black Country Housing Market Area (HMA) and highlights both the overall housing shortfall across this area and the need for cross-boundary cooperation to ensure that the housing needs associated with the wider area can be met. It is recognised that a significant area of land which is currently Green Belt will need to be reallocated for the wider development needs of the region.</p> <p>A recommendation for growth between Redditch and Bromsgrove is mentioned within the study. However, it considers this area for a new settlement, rather than an urban extension. In this case, Taylor Wimpey suggests a more preferable growth option would be through the creation of urban extensions, which can be delivered more quickly than a new settlement and will be more responsive in addressing Bromsgrove's housing need.</p> <p>Although Taylor Wimpey is aware that Bromsgrove Council has made it clear that the study's findings do not represent the Council's views, it does provide an informative analysis regarding the redistribution of growth within the Greater Birmingham Housing Market Area and should be given some weight when considering a future growth strategy.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	89	Reuben	Bellamy	Lone Star Land	Client	The SGS has found a significant number of houses from a re-assessment of density and brownfield sites that apparently was not available to the inspector of the Birmingham Local Plan. As a result, this urban capacity and densification figure has not been subject to independent scrutiny and therefore needs to be treated with caution.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	89	Reuben	Bellamy	Lone Star Land	Client	The overall approach of the SGS in assuming that individual Districts should identify the locations for sites of less than 1500 dwellings and that larger sites are identified in broad locations for further study is supported. The critical matter is how those broad locations are tested and compared. The most important matter is that the constituent local authorities actually agree to accommodate their share of the unmet need based on the sound planning principles of sustainable development, and relationship and linkages to the conurbation.	Comments are noted. It will be necessary to agree BDC'S appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019).
SI13	90	Owen	Jones	LRM Planning	Persimmon Homes	<p>The summary provided in paragraphs 4.26 – 4.28 of the consultation document provides a compelling explanation of the established circumstances in the housing market area and the land use implications for how long term development needs are going to be need to be accommodated. In terms of the approach in the SGS, of necessity this is a high-level piece of work which requires refinement at a more local level. This is especially true in the case of Bromsgrove where the broad and strategic assessment of the Green Belt has been the principal driver of identifying areas of search. As a consequence, the fact that no areas of search were identified in Bromsgrove Town for urban extensions (rather than or in addition to a new settlement) is clearly not correct.</p> <p>On this basis, this Study is of limited relevance in determining a strategy for the District and considerable work will need to be undertaken locally to establish development strategies for the plan area.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	91	Max	Plotnek	Maddox Planning	David Goldstein	<p>Support the approach taken in the SGS in terms of carrying out a strategic Green Belt review utilising a consistent Green Belt review methodology within the HMA to establish broad locations for new homes if a shortfall in delivery remains after a review of land outside the Green Belt has been undertaken. The methodology specified in the SGS is supported in terms of assessing parcels of land within the Green Belt against the purposes of the Green Belt set out in the Framework.</p> <p>It is considered that the parcels of land within the Green Belt the SGS assessed are too large, meaning smaller parcels of land that could accommodate sustainable extensions to existing settlements could be overlooked. If smaller parcels of land within the overall site were considered, the assessment may conclude that some parcels are appropriate for development whilst others are not. Therefore, the methodology for the Green Belt review should be revised.</p>	These comments are noted. Smaller parcels are to be assessed during Stage 2 of the Green Belt Assessment.
SI13	98	Sally	Oldaker			The GL Hearn Study is just a joke – it didn't even get some of the basic things right (a map that put Alvechurch railway station on Red Lion Street, for example) and had clearly been put together by people who hadn't bothered to gain any knowledge of this area. If the so-called 'Barntchurch' new town was built it would totally alter the character of the area – it would be better to scatter development around rather than build what would be an actual town. Also the report states that we have good transport links – have they actually tried getting anywhere? It's total nonsense to say that nobody would have to commute because all jobs would be inside the new town. The study should be disregarded in its entirety.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	99	Mark	Dauncy	Pegasus	Gallagher Estates	There are a number of subjective assessments and assumptions made throughout the document therefore unable to comment on whether the SGS approach is appropriate.	Comments are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	100	Ryan	Bishop			Unfortunately if we are to deliver on being the second city of the UK we need to allow for growth within and around Birmingham – we need to support that growth with hopefully will allow growth in our District as a partner.	Comments are noted.
SI13	101	Richard	Peach			[see response to GBM2K] BDC should not entertain any lobbying from the housebuilding industry, such as the Hearn/Wood report. To include it in this exercise and to call it “evidence” is spurious: at best it is mischievous and at worse an attempt to invoke a nightmare scenario to make us ordinary people more likely to accept a lesser but still vast incursion into Bromsgrove’s Green Belt.	These comments are noted. The SGS is an independent study any accusations of development industry lobbying or mischievous behaviour should be substantiated with evidence. Information is provided in an open , honest and transparent manner in order to inform people on all the issues and information which the planning process has to balance .The District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	101	Richard	Peach			[see response to GBM2K & SI14] To accept the suggestion of 15,000 homes between Barnt Green and Alvechurch into this consultation with little more than a shrug throws a blanket of doubt over the whole process because we don’t know how much veracity to afford or faith to put into any of the other information offered to us to justify the methodology of or process of reviewing the Green Belt.	These comments are noted. Information is provided in an open, honest and transparent manner in order to inform people on all the issues and information which the planning process has to balance. The District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	The Greater Birmingham needs will emerge in due course as the needs methodology is refined by government policy. This issue needs to be parked pending such clarification.	Comments are noted and agreed.
SI13	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Whilst we are generally in agreement with the general approach of the Greater Birmingham Housing Market Area Strategic Growth Study, an error has been found in the application of its methodology to Parcel S19, to the north-east of Bromsgrove. On Figure 36, the whole of parcel S19 is identified as making a ‘principal’ contribution, which contradicts Figure 27, which shows the southern half of the parcel as only contributing to the prevention of sprawl, and not maintaining strategic separation. This would imply that the correct approach based upon the report’s methodology would be to show the northern half of parcel S19 as making a ‘principal’ contribution whilst the southern half should be shown as making a ‘supporting’ contribution. This would be consistent with the pattern of settlement observed in the area, and we therefore conclude that Figure 27 is correct and Figure 36 is incorrect. The suggestion of meeting future housing need from the West Midlands Conurbation in this area through the provision of a new settlement is not supported due to its effects on the purposes of the Green Belt, and due to the time this would take to provide the level of housing supply required.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Consider the outcomes of the SGS to be acceptable.	Comments are noted.
SI13	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	We consider the outcomes of the SGS to be acceptable – as we have previously stated, BDC must take a proactive and cooperative approach as an HMA authority and the sooner this is addressed in the OAN for the District as a whole the better. This is not a political matter: it is an essential part of collaborative planning for a sub-region that is hugely constrained by Green Belt and arbitrarily-drawn administrative boundaries.	These comments are noted.
SI13	113	Gareth	Sibley	RCA Regeneration	CAD Square	We consider the outcomes of the SGS to be acceptable – as we have previously stated, BDC must take a proactive and cooperative approach as an HMA authority and the sooner this is addressed in the OAN for the District as a whole the better. This is not a political matter: it is an essential part of collaborative planning for a sub-region that is hugely constrained by Green Belt and arbitrarily-drawn administrative boundaries.	These comments are noted.
SI13	114	Charles	Robinson	Rickett Architects	Cawdor	The SGS is a High Level assessment; Bromsgrove and others need to get on and allocate/deliver a significant level of growth now or the region as a whole will stagnate and loose out to other regions (Northern Powerhouse) that welcomes growth.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	115	John	Breese	Rosconn Strategic Land		The SGS is a material consideration, however it is for the District Council to undertake its own Green Belt Review.  The SGS by its nature is a very high-level strategic study, focusing on strategic development options which could potentially support development on urban extensions and employment led strategic development of between 1500 – 7,500 homes and New Settlements of 10,000+ homes. Development of this nature would be a discontinuation of the previous spatial strategy of the adopted Bromsgrove District Plan which has been one of dispersal focused between Bromsgrove Town and the Large Settlements, with the majority of growth directed to settlements with train stations. As such in view of the likely scale of housing needed within the District and the urgency to deliver this, smaller scale development distributed across the most sustainable settlements in the District is the optimal solution so this study has limited applicability to the emerging Local Plan. Additional benefits of helping deliver local housing needs close to where they arise and help main and enhance local services and facilities to ensure the vitality of local communities is protected.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.

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SI13	120	Michael	Davies	Savills	Cala Homes	This is a broad study and more detailed studies are required to be undertaken by each HMA authorities within their boundaries. Study only looks at strategic sites but we consider that authorities should allocate a range of sites at different scales.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	122	Michael	Davies	Savills	Landowners	We understand that the GL Hearn Strategic Growth Study (February 2018) recommends various locations across the HMA which could be considered for strategic development. This is a broad study and more detailed studies are required to be undertaken by each HMA authorities within their boundaries. Further work is therefore required to understand the specific development sites that can be considered suitable, as the SGS only provides a broad overview.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	123	Michael	Burrows	Savills	Landowners	<p>The SGS recommends various locations across the HMA which could be considered for strategic development. This is a broad study and more detailed studies are required to be undertaken by each of the constituent HMA authorities within their administrative boundaries.</p> <p>The BDC Local Plan Review will be looking at the period until at least 2036, or even beyond. BDC needs to give consideration to paragraph 67 of the NPPF which states that: "...Planning polices should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability". The NPPF goes onto state that specific, developable sites or broad locations for growth should be identified for years 6-10 and, where possible, for years 11-15 of the plan. BDC therefore needs to go beyond the broad outcomes of the SGS and identify a suitable supply of suitable deliverable and developable sites to meet the District's housing requirement (including unmet cross-boundary need).</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	124	Robert	Lofthouse	Savills	Taylor Wimpey	We have no specific comments to make on this issue, other than the need to accommodate housing to meet the wider strategic requirements for growth places a stronger emphasis on the effective delivery of existing and future sites allocated for development.	Comments are noted.
SI13	136	Kathryn	Young	Turley	Land Fund	<p>As outlined in our response to Q SI 9, the most up-to-date evidence on the housing needs of the HMA comprises the Greater Birmingham HMA Strategic Growth Study (SGS, February 2018) commissioned by the 14 local authorities within the HMA (including BDC) and acknowledged by the 14 local authorities in two Housing Position Statements (February 2018 and September 2018). This is an important piece of evidence particularly in relation to need because it provides a consistent and up-to date position across the whole HMA, looking at the periods 2011-31 and 2011-36. The SGS provides several demographic and economic-led projections of housing need, and also applied the standard methodology so can be considered a robust assessment of need which has been assessed consistently across the HMA.</p> <p>The SGS also provides a consistent assessment of housing supply across the HMA. It identifies a total supply of 197,600 dwellings to 2036 (Table 28). As a result, the minimum shortfall across the HMA is in the order of 61,000 dwellings between 2011 and 2036 (this factors in the commitments towards the Coventry and Warwickshire HMA) (Table 29). This shortfall figure is included within the Joint Position Statement of the 14 local authorities (including Bromsgrove) issued on 21 February 2018. It is apparent that the shortfall would be in the order of 71,000 dwellings to 2036 if the standard method were to be applied and 116,000 for the Economy Plus Scenario.</p> <p>Bromsgrove District is well placed to make a meaningful contribution to addressing the HMA shortfall given its close proximity and strong relationship (including employment and commuting linkages reflecting good public transport accessibility) to Birmingham and the Black Country where the majority of the shortfall is arising. Bromsgrove District is also well placed to assist as it is one of four local authorities within the HMA which are currently committed to delivering local plan reviews including Green Belt reviews and releases (the others being Solihull, Lichfield and South Staffordshire).</p> <p>Once BDC has agreed an appropriate contribution to the HMA's unmet needs it will be necessary to consider the spatial strategy to deliver this as sustainably as possible.</p>	Comments are noted. It will be necessary to agree BDC'S appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019).



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI13	137	Matthew	Fox	Turley	Redrow Homes	<p>As outlined in our response to Q SI 9, the most up-to-date evidence on the housing needs of the HMA comprises the Greater Birmingham HMA Strategic Growth Study (SGS, February 2018) commissioned by the 14 local authorities within the HMA (including BDC) and acknowledged by the 14 local authorities in two Housing Position Statements (February 2018 and September 2018). This is an important piece of evidence particularly in relation to need because it provides a consistent and up-to-date position across the whole HMA, looking at the periods 2011-31 and 2011-36. The SGS provides several demographic and economic-led projections of housing need, and also applied the standard methodology so can be considered a robust assessment of need which has been assessed consistently across the HMA.</p> <p>The SGS also provides a consistent assessment of housing supply across the HMA. It identifies a total supply of 197,600 dwellings to 2036 (Table 28). As a result, the minimum shortfall across the HMA is in the order of 61,000 dwellings between 2011 and 2036 (this factors in the commitments towards the Coventry and Warwickshire HMA) (Table 29). This shortfall figure is included within the Joint Position Statement of the 14 local authorities (including Bromsgrove) issued on 21 February 2018. It is apparent that the shortfall would be in the order of 71,000 dwellings to 2036 if the standard method were to be applied and 116,000 for the Economy Plus Scenario.</p> <p>Bromsgrove is well placed to make a meaningful contribution to addressing the HMA shortfall given its close proximity and strong relationship (including employment and commuting linkages reflecting good public transport accessibility) to Birmingham and the Black Country where the majority of the shortfall is arising. Bromsgrove is also well placed to assist as it is one of four local authorities within the HMA which are currently committed to delivering local plan reviews including Green Belt reviews and releases (the others being Solihull, Lichfield and South Staffordshire).</p> <p>Once BDC has agreed an appropriate contribution to the HMA's unmet needs it will be necessary to consider the spatial strategy to deliver this as sustainably as possible.</p>	Comments are noted. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019).
SI13	138	Charles	Robinson	Twelvetwentyone	Landowners	The SGS is a high level assessment: Bromsgrove (and others) needs to get on and allocate/deliver a significant level of growth now or the Region as a whole will stagnate and lose out to other Regions (Northern Powerhouse) that welcome growth.	Comments are noted.
SI13	139	Glenda	Parkes	Tyler Parkes	Oakland Developments	<p>The Plan Review must be prepared in accordance with the Duty to Cooperate, which sets a legal duty for the Council and other public bodies to engage constructively, actively and on an ongoing basis on planning issues which affect more than one local planning authority area. It is therefore vital that the SGS, which was commissioned by all 14 local authorities within the HMA, is taken fully into consideration.</p> <p>It is therefore imperative that Bromsgrove District, as well as the other local authorities, undertake detailed technical work to objectively assess the options proposed in the SGS and to assess all other viable options. Authorities should not be limited in their search areas to only those locations identified in the report if viable alternatives can be identified. It is vital that this more detailed objective assessment of options is shared amongst the local authorities.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI13	161	Ian	Macpherson		Self	Surprised that more development is not assumed on brownfield land. Dudley may be able to accommodate their development on brownfield sites.	Comments are noted.
SI13	165	Johanna	Wood			<p>Seems to be an SGS that is very biased towards the green belt in the South and round to the Eastern areas of Birmingham and Warwickshire. Far too little focus on the North and Western areas as possible solutions.</p> <p>This study should be ignored until BDC has concluded its own review of what is available and feasible to help support Great Birmingham in its housing crisis. BDC should not be bullied into destroying existing thriving communities through the building of new towns on green belt.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	176	Mr & Mrs J D	Winslow			The options presented by the independent consultants who prepared The Greater Birmingham HMA Strategic Growth Study highlight proximity to the conurbation and transport hubs, particularly rail (para 10.24), as of major importance in guiding choice of where to site housing to satisfy the needs of Birmingham outside its boundaries. Whilst we agree with these priorities, it is clear that far more detailed and co-operative work will be necessary in the light of the particular circumstances within each of the surrounding districts potentially affected. We note that Bromsgrove will be addressing its role in any such provision at a later date (I and O para 4.29).	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base and sustainability appraisal of future development options.
SI13	190	Philip	Ingram			The Birmingham Development Plan identifies an unmet need of 37,900 dwellings. This should be addressed by the Greater Birmingham HMA authorities. The SGS should be taken into consideration by the Council in the plan review.	Comments are noted. It will be necessary to agree BDC's appropriate contribution to the HMA's unmet housing needs through a Statement of Common Ground under the Duty to Co-operate Requirements as set out in the NPPF (2019).

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SI13	192			Dodford with Grafton Parish Council		There are existing boundaries (usually roads) which define the natural communities (M5, M42, A38 etc) so infill using these to demarcate development would make sense. Extending for instance, Longbridge into Bromsgrove, would destroy both communities because they are so different.	Comments are noted.
SI13	194	Darren	Oakley	RPS	Clients	RPS consider that whilst the SGS is a relatively well-structured and comprehensive evidence study, it is acknowledged as being the first step towards addressing the scale of housing land undersupply across the GBHMA	These comments are noted.
SI13	194	Darren	Oakley	RPS	Clients	The fact that the SGS is independent is welcomed, however RPS would be concerned if LPAs were to then devise their own strategic evidence base in some way at odds with the general strategic approach provided in the SGS.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
<b>Q.SI14: Do you have any comments on its outcomes or any views on the further work that needs to be undertaken to fully test the options presented in the SGS?</b>							
SI14	1	Tammy	Williams	Alvechurch Parish Council		<p>Birmingham CC are looking for the easy option to put their housing on cheaper Green Belt land belonging to other authorities rather than taxing land owners who are land banking brownfield sites or waiting until profits are rising or they want to negate any planning obligations by reducing the affordable elements.</p> <p>Bromsgrove should be left to find space for its own strategic housing. Cooperation has already seen parts of Longbridge and Cofton Hackett used for Birmingham housing allocations.</p> <p>Land owners know that if they have a field in the Green Belt then intentionally make it so undesirable; the local authority is more likely to grant planning permission. This can increase the value of that land roughly 300 times over. This sort of iniquity in the housing and land trading industry has got to stop as it is one of the fundamental causes for the current lack of affordable housing, and simultaneous glut of luxury and executive developments.</p>	Comments are noted
SI14	2	Gill	Lungley	Barnt Green Parish Council		<p>BCC needs to be clear on what it wants from the areas which surround it. Does it want them to provide leisure for Birmingham residents, areas of countryside within the GB, transport, supporting industry etc.</p> <p>The SGC seems to be a somewhat crude housing dump.</p>	Comments are noted.
SI14	11	Rosamund	Worrall	Historic England		The consideration of a strategic green belt review as part of the SGS is welcomed, and should be used to establish the most sustainable pattern of development distribution within the West Midlands conurbation.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	19	Steven	Bloomfield	Worcestershire Wildlife Trust		All other options utilising non Greenbelt land should be exhausted before development of this type is considered within the Greenbelt. Must be subject to very detailed work and would represent a step change in delivery that would be hard to assimilate into the ecological and landscape context of the area. Do not believe that a new settlement in this area should be progressed until all other options to deliver unmet need have been explored and alternatives ruled out.	Comments are noted.
SI14	20	P	Harrison	Wythall Parish Council		No further work should be undertaken to test the options presented in the SGS unless and until the study is revised to take into account the latest enhanced housing figures in the Second Devolution Deal.	Comments are noted.
SI14	22	Carl	Mellor	Black Country Authorities		Any Green Belt Review and associated evidence undertaken as part of the review of the Bromsgrove District Plan will need to test the findings of the SGS thoroughly to either support or challenge its outcomes. Only then can any supported proposals in the SGS be reflected in the allocations and proposals put forward in the review of the District Plan.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	25	Gary	Palmer	Solihull Metropolitan Borough		It is important to acknowledge that Bromsgrove can play a valuable part in addressing the HMA shortfall. It is disappointing that Strategic Issue 5 does not go further and set out some of the levels of HMA shortfall that will be tested as the growth options are developed further.	Comments are noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI14	26	Kelly	Harris	South Staffordshire District Council		Strategic Issue 5 'Co-operating with the West Midlands conurbation' does cross reference and provide a link to the GBHMA Strategic Growth Study the Issues and Options document. There is however little explanation of the context supporting the study regarding the scale and source of the housing shortfalls within the HMA or any consideration of the study findings; including the possible identification of a new settlement between Bromsgrove and Birmingham which the study recommends should be tested through the local plan making process. It is considered that the Issue and Option stage is an ideal opportunity to enable the discussion on such matters and to generate debate on what possible approaches may be taken forward to address these issues. South Staffordshire Council is currently consulting on its Local Plan Issues and Options where we have identified the HMA Strategic Growth Study areas of search in our district, and are seeking views on a number of broad spatial options that could align with these areas of search.	Comments are noted.
SI14	27			Stratford On Avon District Council		Both BDC and SDC were involved in commissioning the SGS. This study itself is clear; it identifies broad locations that, along with any other locations, the consultants considered warranted further investigation through the plan-making process. The conclusions have been reached using a reasoned and justified methodology and there is certainly logic as to why certain locations are recommended for further detailed work. However, the identification of a broad location in the Strategic Growth Study does not bind the authority in any way and the merits of alternative broad locations should also be considered and compared with those identified.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	28	Emily	Barker	Worcestershire County Council		For any development close to the district boundary, the Council will need to consider where the infrastructure requirements will fall. WCC may, for example, apply a different pupil need than is used in Birmingham.	Comments are noted and agreed.
SI14	29	Daniel	Atiyah	Wyre Forest District Council		Wyre Forest is not part of the greater Birmingham and Black Country Housing Market Area, unlike Bromsgrove District. The BHMA Strategic Growth study (Published February 2018) concludes that there is an outstanding minimum shortfall of 28,150 dwellings to 2031, and 60,855 dwellings to 2036 in the Birmingham and Black Country HMA. The report also specifically lists the areas between Birmingham and Bromsgrove as potential areas for development. Wyre Forest District Council will welcome further liaison through the duty to cooperate process over this issue to understand how Bromsgrove District will be helping to meet this shortfall.	Comments are noted.
SI14	34	Sue	Baxter			I do not believe any further work needs to be undertaken	Comments are noted.
SI14	35	Peter	King	Campaign to Protect Rural England		A review of the issues raised in Q SI 13 should be undertaken.	Comments are noted.
SI14	42			Wythall Residents Association		No further work should be undertaken to test the options presented in the SGS unless and until the study is revised to take into account the latest enhanced housing figures in the Second Devolution Deal.	Comments are noted
SI14	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	The SGS remains part of the evidence base for each of the HMA authorities. It is considered appropriate to build upon the findings of the SGS to establish allocations which can deliver housing growth over the Plan Period.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	It is considered that new settlements will require long lead-in times which will stifle their ability to meet the identified need quickly. This is recognised within the SGS which states that new settlements can take up to 10 years to deliver housing. Therefore, it is considered that the SGS's reliance on new settlements to deliver much of the unmet need is unwise and priority should be given to options which can provide the required housing, such small scale readily deliverable sites on the edge of existing settlements which do not require significant infrastructure upgrades to secure delivery.  The Council should recognise the SGS as part of the evidence base of the wider HMA and it is appropriate for the Council to build upon its findings, and in particular the broad areas of search, within the own evidence base.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	NO	Noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI14	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	It is acknowledged that Bromsgrove is undertaking a comprehensive review of its Green Belt to seek sites for release to accommodate strategic growth of the District. In that vein, the Green Belt assessment must take into account the findings of the Greater Birmingham HMA Strategic Growth Study where it makes comment on how the unmet need to cater for in Districts such as Bromsgrove. By taking these findings into account through the Green Belt assessment, all options to ensure that both the District's growth needs can be met alongside cross-boundary need that will be accommodated for within Bromsgrove. Due consideration of all options as provided in the SGS will aid in the LPA's exploration of Green Belt release options and in turn aid in dictating what distribution strategy is adopted by the emerging Local Plan. It is advanced that through representations made to Strategic Issue 4 that is Claremont Planning's view that a range of options for development distribution should be explored and as such no options should be precluded in the context of the Green Belt assessment when incorporating the conclusions of the SGS into the assessment also.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	52	Tom	Ryan	Claremont Planning	Bellway Homes	It is acknowledged that Bromsgrove is undertaking a comprehensive review of its Green Belt to seek sites for release to accommodate strategic growth of the District. In that vein, the Green Belt assessment must take into account the findings of the Greater Birmingham HMA Strategic Growth Study where it makes comment on how the unmet need to be catered for in Districts such as Bromsgrove. Due consideration of all options as provided in the SGS will aid in the LPA's exploration of Green Belt release options and in turn aid in dictating what distribution strategy is adopted by the emerging Local Plan.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	The Green Belt assessment must take into account the findings of the Greater Birmingham HMA Strategic Growth Study where it makes comment on how the unmet need to be catered for in Districts such as Bromsgrove. By taking these findings into account through the Green Belt assessment, all options to ensure that both the District's growth needs can be met alongside cross-boundary need that will be accommodated for within Bromsgrove. Due consideration of all options as provided in the SGS will aid in the LPA's exploration of Green Belt release options and in turn aid in dictating what distribution strategy is adopted by the emerging Local Plan.  A range of options for development distribution should be explored and as such no options should be precluded in the context of the Green Belt assessment when incorporating the conclusions of the SGS into the assessment.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	54	Katherine	Else	Claremont Planning	Miller Homes	The Green Belt assessment must take into account the findings of the Greater Birmingham HMA Strategic Growth Study where it makes comment on how the unmet need could be catered for in Districts such as Bromsgrove. It is advanced that through representations made to Strategic Issue 4 that is Claremont Planning's view that making best use of existing areas of development and established directions of growth, such as to the north of Redditch, should continue to be explored as an option to contribute towards accommodating unmet needs arising from the Birmingham HMA.	Comments are noted.
SI14	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	We suggest that in addition to a strategic new settlement proposition (which is unlikely to be delivered in the short-medium term), there will be a need to meet Birmingham's ongoing housing needs close to where they originate. As such, locations on the edge of the conurbation should also be considered as having potential to deliver well-planned growth capable of meeting housing needs in the medium term alongside the long term planning and delivery of new settlements.  Thus, further work in relation to Green Belt review should be undertaken, including an assessment of the potential that selective Green Belt release adjacent to the urban area (which delivers clear and justified growth and infrastructure objectives of the conurbation or local area) might have as part of an integrated growth strategy for Bromsgrove district, in order to ensure that growth needs can be met over the short, medium and long term.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	Support the identification of land on the edge of Birmingham to accommodate residential development during the plan period as this is a sustainable location with excellent transport links and services and facilities within close proximity.  Understand the need for the selection of sites which will follow after evidence gathering including a SHLAA and a Green Belt review.  It is important that the Council considers all parts of the District and are mindful of the size of parcel that they assess as part of the Green Belt Review. Parcels of land which are too large or have very different characteristics throughout and therefore one definitive conclusion for a parcel of land may not be the most suitable and appropriate assessment method.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.

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SI14	65	Louise	Steele	Framptons	Summix Ltd	<p>The SGS recommends a number of Areas of section for Strategic development, which should be taken forward for further assessment through the plan making process as having potential to contribute to meeting the housing needs shortfall. The Client's site is not included as an area of search, it is therefore the view that the Bromsgrove Green Belt Purposes Assessment which looks at sites at the more local level is a more appropriate assessment.</p> <p>In relation to the outcomes of the SGS, it is considered that the correct approach is to examine Bromsgrove's Green Belt against that Council's own "assessment criteria" as it may be that the Bromsgrove study does not concur with the GBHMA Strategic Growth Study.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	72	Stephen	Peters			No further work should be undertaken to test the options presented in the SGS unless and until the study is revised to take into account the latest enhanced housing figures in the Second Devolution Deal.	Comments are noted.
SI14	76	Emily	Vyse	GVA	University of Birmingham	<p>The strategic Green Belt review is flawed. The reasons for this are: The initial assessment of the roles that the different parts of the Green Belt play has been undertaken at too broad a level. The result is a set of conclusions that are not robust. The University's land is a good example of a situation where the broad brush approach has generated a perverse outcome; It has misinterpreted the purposes of Green Belts and / or misapplied these in the context of the conurbation. For example, the whole of the inner edge of the Green Belt (i.e. the edge that abuts the conurbation) checks sprawl and safeguards the countryside from encroachment. Yet GL Hearn has concluded that only certain parts of the Green Belt fulfil these purposes; If the Authors' starting point was that some land will need to be released from the Green Belt (and it should have been – this is what the evidence tells us), then rather than assess the Green Belt sectors as it has (including 'weighting' the purposes of the checking sprawl and preventing neighbouring towns from merging), it should have (i) accepted that, inevitably, there will need to be some encroachment into the countryside and some expansion of the conurbation (e.g. sprawl) if sustainable outcomes are to be achieved; (ii) determined what absolutely must not be allowed to happen (e.g. Birmingham merging with Bromsgrove or Solihull etc.); (ii) defined 'no go' areas in the light of (i) based upon a proper, detailed assessment of the sensitive parts of the HMA and a proper understanding of what sensible physical parameters look like; and (iv) sought to identify areas of search based on avoiding no go areas and delivering the most sustainable solutions possible; The Authors have concluded that the University's land forms part of an area that makes a Principal Contribution in Green Belt terms, yet, on its own analysis, it only fulfils one of the two Green Belt purposes it has identified as key. It may be that similar errors have been made in respect of other parcels of land; The findings of the study have, ultimately, been shaped by the weak, broad brush assessment that the Authors have completed of the Green Belt sectors at the outset. Because the starting point was bad, we can have no confidence in the Study's conclusions.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	78	Sean	Rooney	Harris Lamb	Barratt Homes	Within the SGS, the whole of the West Midlands GB was assessed. The district wide GB review needs to take the general conclusions forward and look at the GB in the district at a smaller scale, with smaller more discrete parcels to be assessed. Whilst the land east of Birmingham Road, Alvechurch is of a scale of development that is smaller than that considered on the SMA and therefore falls out of the areas of search that it identified to meet the shortfall in supply against need. The report identifies that larger strategic sites areas of search for new housing, individual authorities are going to have to consider proportionate dispersal sites.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	78	Sean	Rooney	Harris Lamb	Barratt Homes	The SGS concludes that as well as identifying larger strategic areas of search for housing, individual authorities are going to have to consider proportional dispersal sites as suitable to accommodate more localised housing needs.	Comments are noted.
SI14	79	Shamim	Brown			I am happy with the council plan in terms of the anticipation of requirements for future dwellings. I would though think it prudent to allow for more than expectations to account for any changes in the UK and local economies.	Comments are noted.
SI14	80	John	Pearce	Harris Lamb	Bloor Homes	<p>The SGS and the Green Belt review element of the report assessed the whole of the West Midlands Green Belt. In order to carry out a meaningful assessment the Green Belt parcels assessed were of a much larger magnitude in order for it to be manageable.</p> <p>The District wide Green Belt review that is now proposed, and which we comment on under separate cover, needs to take the general conclusions forward and look at the Green Belt within the District at finer grain, with smaller, more discrete parcels to be assessed. In doing so , this will enable specific areas to be identified that can be considered suitable to be released from the green Belt. We comment further under separate cover on the Green Belt Purposes Assessment Methodology.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.

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SI14	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	The SGS assessed Green Belt parcels at a much larger scale whilst the District Green Belt review needs to look at a smaller scale, with smaller more discrete parcels. The SGS concludes that as well as identifying larger strategic areas of search for new housing, individual authorities are still going to have to consider proportionate dispersal sites as being suitable to accommodate more localised housing needs.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	<p>The SGS and the Green Belt review element of the report assessed the whole of the West Midlands Green Belt. In order to carry out a meaningful assessment the Green Belt parcels assessed were of a much larger magnitude in order for it to be manageable. The District wide Green Belt review that is now proposed, needs to take the general conclusions forward and to look at the Green Belt within the District at finer grain, with smaller, more discrete parcels to be assessed. In doing so, this will enable specific areas to be identified that can be considered suitable to be released from the Green Belt.</p> <p>The SGS identified areas of search for new strategic development locations. One of the options that was recommended for further investigation was for a new settlement in the District. Whilst we do not wish to express a view on the suitability of a new settlement within the District or the location of it, we consider that even if there was a political will to bring it forward, it would be unlikely to happen as part of this Local Plan review. As such, we consider that the Council should consider the release of a range of sites to meet its housing needs in the period up to 2030 and beyond. This would include the release of small and medium sized sites as is required by paragraph 68 of the Framework which explains the need to release such sites in order to assist with the delivery of housing.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	<p>The Green Belt Review needs to take the general conclusions forward and to look at the Green Belt within the District at finer grain, with smaller, more discrete parcels to be assessed .</p> <p>The Council should consider the allocation of a range of sites, including small and medium sized sites, in order to meet the District's housing needs. It is unlikely that the option of a new settlement within the District would come forward as part of the Plan Review.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	86	Rebecca	Anderson	Iceni Projects	Generator Developments	<p>Iceni has previously carried out a study for North Warwickshire on what might be an appropriate proxy figure for meeting a proportion of Birmingham's overspill need, in advance of the Duty to Co-Operate process being completed and agreeing how this should be divided up.</p> <p>A more detailed note is included which uses a similar methodology to that agreed by North Warwickshire this is appended to this document. We have concluded it would be reasonable to test provision of between 17.0 – 22.0% of Birmingham's unmet need being met in Bromsgrove. This equates to 6,440 – 8,440 dwellings over the period to 2031. This should be regarded as a minimum figure given that there are likely to be further unmet needs arising over the 2031-36 period.</p> <p>This is in addition to the SOAN requirements for the Borough and the additional level of weighting to encourage economic growth in the District.</p> <p>The Council will need to understand what level of overspill is necessary beyond 2031 as any Local Plan will need to plan to 2035 at the very earliest (assuming adoption in 2020)</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	87			Indenture		1,600 dwellings have been built since 2011, therefore in 7 years Bromsgrove have built less than 5% of the existing dwelling stock. Unacceptable, on this basis it will take 140-150 years to replace existing housing stock.	Comments are noted.
SI14	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>Strategic Issue 5 identifies Bromsgrove District as part of the Birmingham and Black Country Housing Market Area (HMA) and highlights both the overall housing shortfall across this area and the need for cross-boundary cooperation to ensure that the housing needs associated with the wider area can be met. It is recognised that a significant area of land which is currently Green Belt will need to be reallocated for the wider development needs of the region.</p> <p>A recommendation for growth between Redditch and Bromsgrove is mentioned within the study. However, it considers this area for a new settlement, rather than an urban extension. In this case, Taylor Wimpey suggests a more preferable growth option would be through the creation of urban extensions, which can be delivered more quickly than a new settlement and will be more responsive in addressing Bromsgrove's housing need.</p> <p>Although Taylor Wimpey is aware that Bromsgrove Council has made it clear that the study's findings do not represent the Council's views, it does provide an informative analysis regarding the redistribution of growth within the Greater Birmingham Housing Market Area and should be given some weight when considering a future growth strategy.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.

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SI14	89	Reuben	Bellamy	Lone Star Land	Cleint	The testing of options presented in the SGS must be undertaken on the basis of the strategy of this emerging plan - (options 2 and 3) and be based on the more finely grained evidence based that will be produced such as the Green Belt assessment. A 10,000 dwelling new settlement will take at least 10 years to masterplan and start delivering - a factor acknowledged in paragraph 10.49 of the SGS.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	91	Max	Plotnek	Maddox Planning	David Goldstein	Disagree with the findings of the SGS in relation to the Recommended Areas of Search for Strategic Development it proposes (Figure 10). The area of land between Bromsgrove and Catshill (identified as site S20 in Figure 6) is overlooked as an appropriate location for growth as it is considered to fulfil a principle contribution to Green Belt purposes (containing sprawl and maintaining separation). However, these purposes could still be fulfilled if smaller parcels of land within site S20 were developed.  Further work needs to be undertaken to fully assess the options presented in the SGS in regards to the size of the parcels of land the report assesses for release from the Green Belt.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	95			Nigel Gough Associates	Monksgraston Ltd	We would make the point that 1,600 homes have been built since 2011 therefore in 7 years Bromsgrove have built less than 5% of the existing dwelling stock. This is clearly unacceptable. On this basis, it will take 140 to 150 to replace the existing housing stock which is ridiculous.	Comments are noted
SI14	96			Nigel Gough Associates	Mr Stapleton	Would point out that 1,600 homes have been built since 2011, therefore in 7 years Bromsgrove have built less than 5% of the existing dwelling stock. This is clearly unacceptable. On this basis, it will take 140 to 150 years to replace the existing housing stock which is ridiculous.	Comments are noted.
SI14	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	1,600 homes have been built since 2011 therefore in 7 years Bromsgrove have built less than 5% of the existing dwelling stock. This is clearly unacceptable. On this basis it will take 140 to 150 years to replace the existing housing stock.	Comments are noted.
SI14	99	Mark	Dauncy	Pegasus	Gallagher Estates	A new settlement as identified in the SGS would not meet housing and employment needs in a timely manner, due to significant time and cost implications. A combined approach represents a more appropriate strategy which is able to meet unmet needs faster and at a reduced cost.	Comments are noted.
SI14	100	Ryan	Bishop			Only that again we have limited budget and resource to allocate to complete the planning process – we should focus on the critical areas for delivery and ensure the district completes a robust outcome that isn't open to litigation.	Comments are noted.
SI14	101	Richard	Peach			[see response to GBM2K & SI13] To accept the suggestion of 15,000 homes between Barnt Green and Alvechurch into this consultation with little more than a shrug throws a blanket of doubt over the whole process because we don't know how much veracity to afford or faith to put into any of the other information offered to us to justify the methodology of or process of reviewing the Green Belt.	These comments are noted. Information is provided in an open, honest and transparent manner in order to inform people on all the issues and information which the planning process has to balance. The District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	101	Richard	Peach			BDC Officers should resist any attempts to push housing for the conurbation and for Redditch. Redditch's figures are now in flux (which shows how easily the system can go wrong/be manipulated), while Birmingham needs to be clear about how it will develop its brownfield sites before looking to Bromsgrove's green fields.	Comments are noted, the role of officers is to provide professional advice to the District Council on planning matters, any recommendations made by officers is based on a professional judgement balancing the many elements of the planning process.
SI14	101	Richard	Peach			The notion of "duty to co-operate" does not mean our officers should capitulate to pressure from other authorities who would like to offload their housing needs onto Bromsgrove's Green Belt	Comments are noted, the role of officers is to provide professional advice to the District Council on planning matters, any recommendations made by officers is based on a professional judgement balancing the many elements of the planning process. meeting the housing needs of the conurbation is a planning issues which the plan will continue to consider as the plan progresses.
SI14	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	The Greater Birmingham needs will emerge in due course as the needs methodology is refined by government policy. This issue needs to be parked pending such clarification.	Comments are noted.
SI14	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	BDC must take a proactive and cooperative approach as an HMA authority and the sooner this is addressed in the OAN for the District as a whole the better. This is not a political matter: it is an essential part of collaborative planning for a sub-region that is hugely constrained by Green Belt and arbitrarily-drawn administrative boundaries.  Recognise that the duty to cooperate is not a duty to agree, but it is essential that BDC fulfils its role as an HMA authority and addresses their share of the unmet need from the GBHMA.	These comments are noted as is the requirement set out in the NPPF for a Statement of Common Ground.

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SI14	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	We recognise that the duty to cooperate is not a duty to agree, but it is essential that BDC fulfils its role as an HMA authority and addresses their share of the unmet need from the GBHMA	These comments are noted as is the requirement set out in the NPPF for a Statement of Common Ground.
SI14	112	Gareth	Sibley	RCA Regeneration	Piper Group	Consider the outcomes of the SGS to be acceptable. BDC must take a proactive and cooperative approach as an HMA authority . This is an essential part of collaborative planning for a sub-region.	Comments are noted.
SI14	114	Charles	Robinson	Rickett Architects	Cawdor	The SGS is a High Level assessment; Bromsgrove and others need to get on and allocate/deliver a significant level of growth now or the region as a whole will stagnate and loose out to other regions (Northern Powerhouse) that welcomes growth.	Comments are noted.
SI14	120	Michael	Davies	Savills	Cala Homes	The SGS predates the revised NPPF, a further assessment will need to be conducted to be considered as up to date evidence.	Comments are noted
SI14	122	Michael	Davies	Savills	Landowners	As the strategic growth study predates the revised NPPF and the standardised methodology changes consulted on 26th October 2019, a further assessment will need to be undertaken to be considered as up-to-date evidence. We consider that there is a requirement for Local Planning Authorities ('LPAs') to undertake detailed work in their area including Green Belt Reviews.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	123	Michael	Burrows	Savills	Landowners	As the SGS predates both the revised NPPF and the MHLGC consultation on the changes to the standardised methodology, a further assessment of housing need for the HMA area should be undertaken to ensure that it can be considered as robust and up-to-date evidence to inform the Plan-making processes for the constituent LPAs. We consider that there is also a requirement for LPAs to undertake more detailed work for their areas, including Green Belt Reviews.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	134	David	Barnes	Star Planning	Richborough Estates	As with all other local authorities adjoining the conurbation, the Local Plan will have to take into account the unmet housing needs arising from the Birmingham and the Black Country. There will be a need for the Council to consider these housing needs in the preparation of the Local Plan's spatial strategy and, as identified in the response to Questions SI 10 and 11, locations adjacent to the conurbation, such as at Hagley with its excellent locational relationship to the conurbation, or with train stations connecting settlements sustainably to Birmingham, such as Barnt Green, are prime locations for growth.	Comments are noted.
SI14	136	Kathryn	Young	Turley	Land Fund	<p>The SGS outlines 11 "Recommended Areas of Search for Strategic Development" across the HMA including a potential new settlement in Bromsgrove District between Birmingham, Bromsgrove and Redditch. However, the SGS acknowledges that the new settlement options are potential solutions to meet longer-term needs beyond 2031. BDC may wish to test this option though the LPR; this is the approach being taken both by Lichfield District Council and Solihull Metropolitan Borough Council in their local plan reviews. Hagley benefits from a range of services and facilities including excellent sustainable transport links to the GBHMA where the unmet housing need arises. As acknowledged by BDCs evidence base Hagley is the highest scoring 'larger settlement' and should therefore classed as the most sustainable. This should be afforded significant weight in the distribution of development through the LPR.</p> <p>The Green Belt Assessment must be based on a robust methodology. The way in which a land parcel fulfils the purposes of Green Belt should not relate to landscape character or visual amenity other than reflect the importance of openness in any location and this importance should be understood in the local context. The methodology should remove the opportunity for a subjective view to be taken.</p> <p>It is noted that the SGS included a high-level assessment of market capacity in terms of "housing stock growth rates" (Section 9). Table 63 suggests that Bromsgrove is one of several authorities across the HMA which have market capacity to deliver additional supply over and above what is already planned.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SI14	137	Matthew	Fox	Turley	Redrow Homes	<p>The SGS outlines 11 “Recommended Areas of Search for Strategic Development” across the HMA including a potential new settlement in Bromsgrove District between Birmingham, Bromsgrove and Redditch. However, the SGS acknowledges that the new settlement options are potential solutions to meet longer-term needs beyond 2031. BDC may wish to test this option though the LPR; this is the approach being taken both by Lichfield District Council and Solihull Metropolitan Borough Council in their reviews.</p> <p>The SGS identifies that “proportionate dispersal” opportunities (500-2,500 units) including Green Belt on settlement edges will need to be assessed through individual local plan reviews and will be able to address needs up to 2031 (paras. 1.99 and 1.102). Proportionate dispersals are highly relevant to Bromsgrove District given the range and size of settlements which are all surrounded by Green Belt and these will need to be assessed through the Green Belt Assessment and SHLAA processes.</p> <p>The SGS’ review of Green Belt land parcels includes “Parcel S20: between Bromsgrove and Catshill”. This is considered to be an area of local rather than strategic separation and it is noted that the M42 forms a significant division between the two settlements. It states that the Green Belt maintains a “nominal” degree of separation and the various road corridors (notably the M42 and A38, but also the B4091) form development boundaries. These points will need to be reflected in BDC’s Green Belt Assessment.</p> <p>As a final point, it is highlighted that the SGS included a high-level assessment of market capacity in terms of “housing stock growth rates” (Section 9). Table 63 suggests that Bromsgrove is one of several authorities across the HMA which have market capacity to deliver additional supply over and above what is already planned.</p>	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	139	Glenda	Parkes	Tyler Parkes	Oakland Developments	Our Client provides qualified support for the outcomes of the SGS. Whilst many of the principles of the development options are appropriate, our Client recommends that the strategic areas of search are assessed against alternative options which might better reflect national and local strategies. For example, in Bromsgrove, it may be more appropriate to consider a new settlement east of the key diagram proposed area of search. This would ensure, for example, that existing settlements are not subsumed and the separation between large urban areas is retained. Pages 38 and 39 of the SGS set out examples of the type of technical studies and analysis recommended for potential development sites. Our client supports the need for this full range of appraisals to demonstrate that potential allocations could be delivered.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
SI14	161	Ian	Macpherson		Self	Need to establish with the relevant councils how much land is required in Bromsgrove before the Green Belt boundary revisions.	Comments are noted
SI14	165	Johanna	Wood			<p>At this stage in the development of the Bromsgrove District Plan the SGS should be completely ignored and absolutely no additional work undertaken to test any of the options. Only when the BDP is concluded could it be referred to.</p> <p>The SGS feels very much like something commissioned by the large house builders. It supports their long term aim to build large developments on land banked green belt. This is their most profitable strategy. Far more must be done to build on the other forms of land available before Green belt is touched in any major way</p>	Comments are noted.
SI14	166	John	Gerner			It is necessary to preserve green space between the conurbation and Bromsgrove in order to protect the Districts character and identity.	Comments are noted.
SI14	192			Dodford with Grafton Parish Council		There are existing boundaries (usually roads) which define the natural communities (M5, M42, A38 etc) so infill using these to demarcate development would make sense. Extending for instance, Longbridge into Bromsgrove, would destroy both communities because they are so different.	Comments are noted.
SI14	194	Darren	Oakley	RPS	Clients	RPS consider that whilst the SGS is a relatively well-structured and comprehensive evidence study, it is acknowledged as being the first step towards addressing the scale of housing land undersupply across the GBHMA. As recognised in the study, this will ultimately require land to be released from the Green Belt, alongside other sources. This is broadly accepted by the constituent authorities across the GBHMA. It is critical therefore that BDC approach the issue of Green Belt release in a positive manner similar to other LPAs in the West Midlands (i.e. Coventry). This should also recognise the need to address future development needs in Bromsgrove and neighbouring areas beyond 2031 and ensure that the adjusted Green Belt boundaries have longevity into the future.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.

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SI14	194	Darren	Oakley	RPS	Clients	Identification of Areas of Search RPS welcome and support the identification of specific areas for 'further assessment' through the local plan review. This relates in particular to the area described as 'Between Birmingham and Bromsgrove/Redditch (Location NS6, within Area of Search 23)', shown in figure 37 and Table 45 (p191-192). It is worth noting that the SGS recognises the opportunity to focus new development on 'public transport provision' as a focus for 'extensive development' (para 8.101). This assessment recognises the clear links between Bromsgrove and the Conurbation in terms of migration and commuting patterns, which RPS endorse. RPS also agrees with this assessment and the potential for sustainable development within transport corridors.	Comments are noted.
SI14	194	Darren	Oakley	RPS	Clients	Potential Additional Urban Land Supply In terms of future supply from within existing urban areas, RPS would draw attention to Figure 16 of the SGS, which illustrates the limited contribution that Bromsgrove could make from other potential sources of urban supply. Furthermore, additional supply through increasing densities on existing allocated sites would also yield only an additional 374 dwellings (see Table 38, p116 for details).	Comments are noted.
SI14	194	Darren	Oakley	RPS	Clients	It is hoped that BDC progress the local plan review along the 'course grain' of the SGS, rather than establish a local evidence base, that is fundamentally at odds with the SGS particularly in relation to the Green Belt review (see separate comments), that seeks to justify and avoid the contribution that BDC must make to addressing the serious shortfall in land supply to meet the housing needs of neighbouring authorities, as well as its own local housing need, by dismissing the findings of the SGS out of hand.	These comments are noted. The SGS is an independent study and the District Plan Review will be informed by a two stage District wide Green Belt Boundary Review.
SI14	194	Darren	Oakley	RPS	Clients	Current Land Supply in Bromsgrove The SGS states, at paragraph 4.28, "The Council identifies 165 dwellings from additional urban supply which are formed of small SHLAA sites within the urban area. The potential for further capacity is limited, with the majority of white land currently used for education/ school playing fields." The SGS also states, at para 4.29, "In respect of intensification of Bromsgrove Town Centre, development opportunities have been identified however these are not for residential development..." The SGS then goes on to state, at para 4.30, "The Council does not consider that any additional sources of supply are available to yield additional supply such as open space, employment sites or public land." Table 10 (p66) also illustrates that there is no supply identified from emerging allocations, though it is recognised that BDC is now progressing a local plan review, which will include strategic site allocations.	Comments are noted.
<b>Q.H1: Which of the following options do you consider is most appropriate and why? [For options see Sep 2018 consultation document, p.28]</b>							
H1	1	Tammy	Williams	Alvechurch Parish Council		Option 1: makes more sense if we want to conserve land, this should also bear in mind Option 3 so that housing blends in with the local environment.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	2	Gill	Lungley	Barnt Green Parish Council		Option 3 – rely on local distinctiveness and character within the District.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	4	Barry	Spence	Bentley Pauncefoot Parish Council		Option 2 is considered the most appropriate option.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	5	Kevin	Joyes	Beoley Parish Council		Option 3 is the best option when determining the density of new developments.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	9	Alexandra	Burke	Hagley Parish Council		Problem with measuring densities over entire sites, as land will be needed for roads and Open Space on larger sites, whereas smaller ones may front to existing roads and require no public open space. BDC should adopt a net high density generally.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council prefer option 1, however we would also like to restrict density.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Recommend that a blend of Option 2 informed by Options 3 and 4 is used. Setting appropriate densities for different parts of the district, defined on the basis of local character and need to make good use of land offers best approach. Final consideration of density must be informed by local circumstances, GI requirements and architectural choices.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	20	P	Harrison	Wythall Parish Council		The most appropriate option is Option 3 which is how development has hitherto been considered. Each area should be considered on its own merits and distinctiveness.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	34	Sue	Baxter			primarily option 3, each area should be considered on its own merits and distinctiveness, however site density can be influenced to a small degree by good design	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	35	Peter	King	Campaign to Protect Rural England		Density levels should reflect local circumstances and we would like to see local character and site design as key elements in determining density. However, Bromsgrove should also be seeking as a whole to average densities in line with the 35 dph suggested by GL Hearn in the SGS. This will be easier to achieve if there are strong policies of the type of houses provided, for example, homes that allow for down-sizing, linked to good implementation.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	36	Conrad	Palmer	Fairfield Village community Association		Option 1.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	37	Julie	O'Rourke	Tetlow King Planning	Housing Association Registered Providers Planning Consortium	<p>We support the Council's commitment to support development that makes efficient use of land provided that good design is also encouraged, particularly in light of the increased emphasis on place-making within the revised Framework.</p> <p>The NPPF also places a stronger emphasis on increasing densities and for LPAs to set minimum densities, particularly in areas well served by public transport. We recommend that if these are to be applied within the area then any implementation of the (optional) national space standard should be applied across all tenures. In our experience the application of the standards to only affordable housing development causes significant issues not only in the delivery of unequal housing standards, but also for land purchase. In cases where the standard is only applied to affordable housing, market units can be developed at higher densities, reducing RPs' ability to compete and deliver the increased levels of affordable housing so clearly needed across the country. Any implementation of the standard should be thoroughly reviewed through direct discussion with developers of all types, and with a rigorous viability appraisal to ensure that the practical use of the policy will help deliver better quality housing, and more of it.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	38	Sue	Green	Home Builders Federation		The HBF is supportive of the efficient use of land. The setting of any density standards in the LPR should be undertaken in accordance with the 2018 NPPF (para 123) whereby in the circumstances of an existing or anticipated shortage of land to meet identified housing needs then a minimum density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. The Council's proposals under Options 2 and 3 are the most appropriate. A blanket approach to a minimum density across all the District as set out in Option 1 is inappropriate.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	42			Wythall Residents Association		The most appropriate option is Option 3 which is how development has hitherto been considered. Each area should be considered on its own merits and distinctiveness.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Considered appropriate to follow Option 2, by setting a different minimum density standard for different parts of the District. Through the District Plan Review the Council should be identifying allocations or locations that could suitably accommodate an increase in density.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	A mix of Options 2-4 would be supported with minimum indicative densities based on different parts of the District with flexibility built in to allow for the local distinctiveness and good design to flourish. This will ensure that efficient use of land is made, something the Council have control over at application stage, but developments are not stifled through overly onerous planning policies. The Council will also need to take this into account when allocating sufficient land for the identified housing need.  Option 1 is not supported. A policy enforcing density standards across all development within the District should be avoided as it would not take into account the specific circumstances of different sites and their ability to meet a set density standard. Density within a site will also change dependant on landscape and topography meaning a 'blanket policy' will stifle good design and amenity provision. Further, the Council should consider the ability of developers to manage and design schemes taking into account factors such as viability as well as potential occupiers; flexibility is therefore needed when considering density of schemes.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	46	Ian	Mercer	Bruton Knowles	Church of England	Set different minimum density requirements for different parts of the District, however new housing should translate well with its surroundings and reflect local distinctiveness and character. It is important to set a minimum density requirement - a broad-brush approach as set out in option 1 would be inappropriate.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.

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H1	47	Michael	Jones	Caddick Land		Density should be calculated having regard to the character of the area and the sustainability of the location. A combination of options 3 and 4 should be pursued.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	48	Grace	Allen	CBRE	Arden Park Properties	Whilst increasing densities of development is a logical way to increase housing supply, the local character and context must also be taken into consideration. Through the site selection process, the density capability of the site should be assessed using available information at that stage to ensure that those chosen can deliver an appropriate number of dwellings. For both allocated and unallocated sites, a policy which is flexible would be beneficial. If seeking a minimum density standard on development sites, any policy should also make provision for applicants to put balanced proposals forward which demonstrate how they have taken into account the specific site character and context whilst also encouraging as high a density as possible.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	<p>The revised NPPF recognises that planning policies should support development that makes efficient use of land. Paragraph 123 states that where there is an existing or anticipated shortage of land to meet identified housing needs, it is especially important that planning policies avoid homes being built at low densities, and ensure that developments make optimal use of potential of each site.</p> <p>It also advises local authorities to consider the use of minimum density standards and if appropriate set arrange densities that reflect the accessibility and potential different areas. Based on this advice I consider that option 2 and 3 could be utilised to set density requirements for different areas of the district which should be informed by local distinctiveness and character to make the best and most efficient use of the land to be developed.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	<p>Density of development has newly become an important component in maximising the potential and use of land as advanced through the reviewed NPPF. Increasing densities to make the best use of available is a sustainable approach in ensuring that homes can be delivered in accessible locations that can take advantage of increased densities. However, Plan's should be aware that the application of prescriptive policies, such as the implementation of a standard, minimum density can be obstacles to development rather than enabling mechanisms for delivery.</p> <p>It is advanced to the Council that it is Spitfire Home's view that the selection of multiple Options would be most appropriate for the Plan. This ensures appropriate flexibility to ensure that the impact of development can be minimised, but simultaneously the use of land can be maximised as far as possible. As such, Option 1 should be used as an overall guiding baseline across the District, as to avoid development that does not demonstrate best use of a site's potential for development. However, this Option should be used in conjunction with a combination of Options 2 and 3 that establish a response to local distinctiveness, landscape and character. Given the rural nature of the District, the application of higher density requirements would be inappropriate and would demonstrate substantial harm to the existing characters of rural settlements. However, the maximisation of the potential of land should form a fundamental component of this policy to ensure that no development demonstrates inefficient use of a site.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	52	Tom	Ryan	Claremont Planning	Bellway Homes	It is advanced to the Council that it is Bellway Homes' view that the selection of multiple Options would be most appropriate for the Plan. This ensures appropriate flexibility to ensure that the impact of development can be minimised, but simultaneously the use of land can be maximised as far as possible. As such, Option 1 should be used as an overall guiding baseline across the District, as to avoid development that does not demonstrate best use of a site's potential for development. However, this Option should be used in conjunction with a combination of Options 2 and 3 that establish a response to local distinctiveness, landscape and character. Given the rural nature of the District, the application of higher density requirements would be inappropriate and would demonstrate substantial harm to the existing characters of rural settlements. However, the maximisation of the potential of land should form a fundamental component of this policy to ensure that no development demonstrates inefficient use of a site.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	The selection of multiple Options would be most appropriate for the Plan. This ensures appropriate flexibility to ensure that the impact of development can be minimised, but simultaneously the use of land can be maximised as far as possible.  Option 1 should be used as an overall guiding baseline across the District, as to avoid development that does not demonstrate best use of a site's potential for development. However, this Option should be used in conjunction with a combination of Options 2 and 3 that establish a response to local distinctiveness, landscape and character. Given the rural nature of the District, the application of higher density requirements would be inappropriate and would demonstrate substantial harm to the existing characters of rural settlements. However, the maximisation of the potential of land should form a fundamental component of this policy to ensure that no development demonstrates inefficient use of a site.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	54	Katherine	Else	Claremont Planning	Miller Homes	Plan's should be aware that the application of prescriptive policies, such as the implementation of a standard, minimum density can be obstacles to development rather than enabling mechanisms for delivery. The selection of multiple Options would be most appropriate for the Plan. This ensures appropriate flexibility to ensure that the impact of development can be minimised, but simultaneously the use of land can be maximised as far as possible. As such, Option 1 should be used as an overall guiding baseline across the District, as to avoid development that does not demonstrate best use of a site's potential for development. However, this Option should be used in conjunction with a combination of Options 2 and 3. higher density requirements would be inappropriate and would demonstrate substantial harm to the existing characters of rural settlements.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	55	Tamara	Pleasant			Object to Option 1 - this could be a dangerous 'blanket' policy. Preferred Option is 3, so development is in keeping with surrounding area. The appearance and sustainability of new development is also very important. Appearance, again, to be in keeping with the surrounding area.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	We strongly support Option 4 which allows good design to influence, and lead, decisions on appropriate site density. A one-size-fits-all approach fails to meet the complexities of sites.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.

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H1	57	Karin	Hartley	Delta Planning	Bloor Homes Western	With regard to Question Q.H1 (housing densities), the current BDP does not require new housing development to be built at specific densities, but to make the most efficient use of land whilst maintaining the character of an area and local distinctiveness. We consider that this is the right approach for Bromsgrove and that this flexible density policy should be carried forward into the Local Plan Review to ensure that high quality housing that fits with its surroundings continues to be delivered. The focus should be on good design and not simply on delivering housing in accordance with inflexible standards that cannot possibly reflect the variety of locations and type of surrounding development across this mainly rural District. We therefore support Options 3 and 4 included at Question Q.H1.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	58	Karin	Hartley	Delta Planning	Bloor Homes Western & Maximus	With regard to Question Q.H1 (housing densities), the current BDP does not require new housing development to be built at specific densities, but to make the most efficient use of land whilst maintaining the character of an area and local distinctiveness. We consider that this is the right approach for Bromsgrove and that this flexible density policy should be carried forward into the Local Plan Review to ensure that high quality housing that fits with its surroundings continues to be delivered. We therefore support Options 3 and 4 included at Question Q.H1.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	68	Nicole	Penfold	Gladmans		Options 2 and 3 are the most appropriate as they provide flexibility and allow for sites to respond to local circumstances rather than a blanket requirement. Option 1 is too prescriptive, it needs a degree of flexibility to allow schemes whilst making the most efficient use of land.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	69	Latisha	Dhir	GVA	St Phillips	Option 3 is the most appropriate, this will ensure proposed development is of an appropriate size and scale and reflects the features of the surrounding settlements.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	72	Stephen	Peters			The most appropriate option is Option 3 which is how development has hitherto been considered. Each area should be considered on its own merits and distinctiveness.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.



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H1	75	Rachel	Mythen	GVA	Taylor Wimpey	<p>Support Option 3 - This will ensure proposed development is of an appropriate size and scale and reflects the features of the surrounding settlements.</p> <p>The District has a variety of character areas across its administrative boundaries, and it is important that the features within these character areas are maintained and protected through the Local Plan Review. The District comprises a variety of different sized settlements, including main centres such as Bromsgrove, larger settlements and more rural villages. As such, in line with national policy, the densities of new development should accord with the size of these settlements. Whilst it is important to make the best use of land, it is important that this does not override the requirements of achieving high quality design and retaining local distinctiveness.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	76	Emily	Vyse	GVA	University of Birmingham	<p>Option 2 is considered to be the most appropriate option for housing density, which is to “set different minimum density requirements for different parts of the District”. These should however be seen as a guide only, with flexibility to allow for departures to reflect the local context and site specific constraints and opportunities.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	78	Sean	Rooney	Harris Lamb	Barratt Homes	<p>Option 2 is considered to be the most appropriate option for the district. Applying different density requirements to different parts of the district would assist in guiding developers to design schemes that are appropriate to their settings. However, option 4 should be taken into consideration as a minimum densities should be a guide rather than a requirement.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	78	Sean	Rooney	Harris Lamb	Barratt Homes	<p>Option 2 is considered to be the most appropriate A blanket approach to minimum densities is inappropriate and would not respect the different characteristics of the settlements. Whilst a higher density of 35dph might be acceptable in Bromsgrove Town, this may not be suitable for an edge of settlement or rural village location. Option 4 should also be taken into consideration as minimum densities should be a guide rather than a requirement.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	80	John	Pearce	Harris Lamb	Bloor Homes	<p>We consider that Option 2 would be the most appropriate option for the District. The District is characterised by one large town, followed by a range of smaller towns and larger villages. Applying a blanket density requirement across the whole District would not respect the different characters of the settlements.</p> <p>Applying a different density requirement to different parts of the District would be helpful in seeking to guide developers as to what would be considered appropriate. Irrespective of what densities are applied, it should be made clear that they are only a guide and that if a higher density can be achieved through good design then this would also be supported.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Option 2 is considered to be most appropriate for the District. A blanket approach to minimum density as set out in Option 1 is inappropriate and would not respect the different characters of the settlements. Applying different density requirements would assist in guiding developers to design schemes that are appropriate to their settings. Option 4 should also be taken into consideration as minimum densities should be a guide rather than a requirement.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Option 2 would be the most appropriate option for the District. The District is characterised by one large town, followed by a range of smaller towns and larger villages. Applying a blanket density requirement across the whole District would not respect the different characters of the settlements. Whilst a higher density of 35dph may be appropriate in Bromsgrove town, this may not be suitable for an edge of settlement location in rural village. Applying a different density requirement to different parts of the District would be helpful in seeking to guide developers as to what would be considered appropriate. Irrespective of what densities are applied, it should be made clear that they are only a guide and that if higher density can be achieved through good design then this would also be supported. Conversely, where a lower density is appropriate due to site specific constraints then this should not be a reason to refuse development.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Option 2 would be the most appropriate. Applying a blanket density requirement across the whole District would not respect the different characters of the settlements. Applying a different density requirement to different parts of the District would be helpful in seeking to guide developers as to what would be considered appropriate. It should be made clear that they are only a guide and if a higher density can be achieved through good design this would be supported. Where a lower density is appropriate due to site specific constraints, then this should not be a reason to refuse development.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	86	Rebecca	Anderson	Iceni Projects	Generator Developments	We consider that Option 1 is the most appropriate. The NPPF states that local authorities should seek to establish a minimum density policy for brownfield land and explore the potential for utilising this for non-brownfield sites as well (Paragraph 123). We would recommend that this advice is followed in relation to brownfield sites, subject to adding in flexibility for site specific constraints, such as heritage, ecology and townscape.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	87			Indenture		Combination of Option 3 and Option 4	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>Section 11 of the NPPF emphasises the importance of ensuring that land is used in an efficient and effective manner. This approach is clearly supported, but determining the efficient use of land will be a matter of judgment, depending on the character of a site and the surrounding area.</p> <p>Recognising the diverse character of Bromsgrove District, it would not be appropriate to set a minimum density requirement for the District as a whole. Such an approach would have the potential to result in inappropriate development which may not reflect the local context. A sub district approach may have a similar outcome as it would fail to reflect the nature of individual sites.</p> <p>The density of development should reflect the local area and character (Option 3) whilst also being influenced by high quality design (Option 4). Any policy regarding the future density of development should therefore be framed around these considerations, but without specifying a minimum density requirement which is unlikely to result in the most appropriate forms and patterns of development in the Bromsgrove District.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	94			Nigel Gough Associates	Aniston Ltd	Combination of options 3 and 4.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	95			Nigel Gough Associates	Monksgraston Ltd	A combination of Option 3 and Option 4	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	96			Nigel Gough Associates	Mr Stapleton	A combination of Option 3 and Option 4.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	A combination of option 3 and option 4.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	98	Sally	Oldaker			I think Option 3: Rely on local distinctiveness and character within the District so that new housing fits in with its surroundings – because that's a good idea! Different areas need to be looked at differently; you can't have one rule to govern all of them.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	99	Mark	Dauncy	Pegasus	Gallagher Estates	Any standard should also retain a degree of flexibility to allow for development to reflect local character. Any prescribed standard should retain a degree of flexibility to allow for local context to be taken into consideration as per Options 3 and 4. The use of design codes and design led master planning is also recommended. Density standards should be set out in Local Plan Policy rather than in an SPD so that they are subject to viability testing and EIP.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	100	Ryan	Bishop			I would say option 2 and 3 – allow different areas to be diverse and unique but recognise that different areas of the district have and expect different densities. Basing and improving on existing densities per area is a good start to ensure an area maintains its natural look/feel.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	On density of housing the aim should be to increase the density to secure better use of land, but in a manner commensurate with sustenance of the character of an area. It is considered the current policy represents an appropriate balance.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Option 3: Table 30 of the Greater Birmingham HMA Strategic Growth Study (GL Hearn 2018) confirms that Bromsgrove has traditionally had a low level of housing density, achieving just 28 dph in 2008-2011. Table 32 shows that even densities of 30dph will enable an increase in supply of some 6% on existing local plan allocations of 200+ dwellings. Applying a town centre density of 50dph would increase supply by nearly three quarters. The opportunity should therefore be taken to maximise the amount of new development within its context, and particularly to promote development in suitable locations close to the Town Centre, such as the Bromsgrove Golf Centre site, where densities can be appropriately increased	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Option 2 – setting minimum density requirements for different parts of the district should be applied, but applied to the net developable areas. We do consider that more sensitive sites (for instance) located in Conservation Areas may be excluded from such a policy	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Under H1, we consider Option 2 – setting minimum density requirements for different parts of the district should be applied, but applied to the net developable areas. We do consider that more sensitive sites (for instance) located in Conservation Areas may be excluded from such a policy, however.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	112	Gareth	Sibley	RCA Regeneration	Piper Group	Consider Option 2 should be applied , but applied to net developable areas. Consider that more sensitive sites may be excluded from such a policy. The Council need to make it clear what the net completion figure is - how many affordable homes have been delivered, taking account of losses under Right to Buy. Council should also state here what the affordable housing need is. How many people are currently waiting for an affordable home in the District.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	113	Gareth	Sibley	RCA Regeneration	CAD Square	Under H1, we consider Option 2 – setting minimum density requirements for different parts of the district should be applied, but applied to the net developable areas. We do consider that more sensitive sites (for instance) located in Conservation Areas may be excluded from such a policy, however.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	Density standards may be counter productive to the delivery of sustainable development if they are applied in a mechanistic fashion which does not reflect the site's locality. Therefore place greater support on Option 4.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	119	Darren	Oakley	RPS Group	Gleeson	RPS suggests that setting minimum density assumptions is in general terms too prescriptive. Density standards may, in certain circumstances, be counter-productive to the delivery of sustainable development if standards are applied in a mechanistic fashion which do not reflect the locality of the site. RPS would therefore place greater support on Option 4 (Influence site density through good design), which in our view is a succinct version of Option 3.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	120	Michael	Davies	Savills	Cala Homes	Density standards should be undertaken in accordance with NPPF Para 123. Therefore Options 3 and 4 are the most appropriate options. Sites should be assessed on a site by site basis. If Option 1 or 2 is taken by the Council this could lead to greater inflexibility , a blanket approach to minimum densities should not be included in the Plan review.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	122	Michael	Davies	Savills	Landowners	We consider that 'Option 3: rely on local distinctiveness and character within the District so that new housing fits in with its surroundings' and 'Option 4: Influence site density through good design' should be adopted by BDC. We consider that sites should be assessed on a site by site basis because of varying site contexts and site specific circumstances and constraints. If Option 1 or Option 2 is taken forward it could lead to greater inflexibility and be obstructive in achieving good design that is appropriate to the local context. Therefore, we consider that a blanket minimum density requirement policy should not be included. Density should be assessed on a site-by-site basis, so Option 3 and Option 4 are the most appropriate.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	123	Michael	Burrows	Savills	Landowners	Notwithstanding the fact that the NPPF (paragraph 123) introduces the potential for LPA to include minimum density policies within Local Plans, this should not be interpreted as an absolute requirement for the wider Bromsgrove District. NPPF paragraph 122 should be seen as the starting point when considering the approach to density through Local Plans.  Options 3 and 4 are the most appropriate and should be taken forward into the new Local Plan. It is considered that development proposals should be assessed on a site by site basis to enable the specific context, constraints and character of each site and the wide diversity inherent within Bromsgrove District to be taken into account. It is considered that the blanket minimum density policies identified within Options 1 and 2 may constrain the ability to achieve this.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	124	Robert	Lofthouse	Savills	Taylor Wimpey	We consider that Option 4, to influence site density through good design, represents the most suitable approach that the Council should apply to new developments. It is not necessarily appropriate to set minimum density requirements for the District or parts thereof. Para 122-123 of NPPF provides appropriate guidance on 'achieving appropriate densities' and should be reflected in future policies.  As part of the application, for the Perryfields development, we have provided a masterplan and parameter plans (explained in the Design and Access Statement) showing how the new homes can be delivered. Such a considered approach is necessary in order to provide flexibility to meet housing needs for different types of home and tenures, whilst respecting the context and character of an area and being deliverable.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H1	134	David	Barnes	Star Planning	Richborough Estates	Specifying a minimum housing density across the District is a crude tool which cannot and does not allow for consideration of the planning context of a scheme. Accordingly, Option 1 should be discounted. A graduated approach to density of housing development should be preferred similar style to the PTAL scoring in Greater London (Option 2). However, there should always be an acknowledgement that there can be departures from any density standards to take into account local distinctiveness, market demand and achieving good design (Options 3 and 4).	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	136	Kathryn	Young	Turley	Land Fund	<p>Our client considers Option 3 (rely on local distinctiveness and character within the District so that new housing fits in with its surroundings) and Option 4 (influence site density through good design) to present the most appropriate options for new housing development. Options 3 and 4 provide greatest flexibility and will maximise the opportunity for new development to respond to the local vernacular and create a sense of place which reflects local character.</p> <p>A 'blanket' or 'one size fits all' approach reflected by Option 1 and option 2 should not be applied as it will have a negative impact on housing mix and may prevent the right types of homes coming forward in the right location to meet specific local needs and market conditions. It is imperative that policies are flexible to ensure that development is not unduly burdened and that policy does not have a negative impact on development viability and restrict or delay sites from being brought forward to meet the housing needs specific to that village or town.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	137	Matthew	Fox	Turley	Redrow Homes	<p>Redrow consider that Options 3 (rely on local distinctiveness and character) and 4 (influence site density through good design) are most appropriate to secure the optimal/efficient use of land in accordance with NPPF paras. 122 and 123. These options will ensure that appropriate densities are identified and delivered at individual development sites. A 'blanket' or 'one size fits all' approach (Option 1) is inappropriate as it is likely to affect the housing mix and prevent the right kinds of homes coming forward in specific locations.</p> <p>It is imperative that any policies relating to residential density are sufficiently flexible to ensure that development is not unduly burdened and that policy does not have a negative impact on development viability and restrict or delay sites from being brought forward to meet housing needs in the area.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	161	Ian	Macpherson		Self	Option 2 with the local distinctiveness covered by NHPs where relevant.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	165	Johanna	Wood			Options 2, 3 & 4	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	166	John	Gerner			Option 4	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H1	174	Michael	Corfield			Set different minimum density requirements for different parts of the District, to maintain the diversity of the different parts of the District.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	179	Neil	Gow	Burcot Garden Centre	Self	A combination of options 3 and 4 would seem most appropriate.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	180	Nicholas	Rands			Option 3: Rely on local distinctiveness and character within the District so that new housing fits in with its surroundings. To maintain the character of settlements within the District.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	192			Dodford with Grafton Parish Council		Site density through better design. The design of some houses in Bromsgrove area are not attractive.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H1	194	Darren	Oakley	RPS	Clients	RPS suggest that setting minimum density assumptions is in general terms too prescriptive. Density standards may, in certain circumstances, be counter-productive to the delivery of sustainable development if standards are applied in a mechanistic fashion which do not reflect the locality of the site. RPS would therefore place greater support on Option 4 (Influence site density through good design), which in our view is a succinct version of Option 3.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
Q.H2: Do you have any other comments on the above options?							



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H2	4	Barry	Spence	Bentley Pauncefoot Parish Council		Paragraph 5.4 states that the District “is known for a considerable number of large properties,” but that does not necessarily mean that trend should be strictly adhered to. It would seem appropriate to allow some development of smaller, therefore higher density housing in some of the rural areas. Local distinctiveness is not achieved solely by providing large properties.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	9	Alexandra	Burke	Hagley Parish Council		Problem with measuring densities over entire sites, as land will be needed for roads and Open Space on larger sites, whereas smaller ones may front to existing roads and require no public open space. BDC should adopt a net high density generally.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	11	Rosamund	Worrall	Historic England		The Plan will need to consider the interrelationship between the historic environment and housing density through relevant development management policies and appropriate assessment of potential development sites for housing.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	20	P	Harrison	Wythall Parish Council		The approach in Option 3 accords with the NPPF.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	28	Emily	Barker	Worcestershire County Council		Supportive of Options 3 and 4 . All options for density should be mindful of the impact on health and wellbeing including the need for adequate provision of green space within developments and connective cycling and walking routes.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H2	33	Steve	Colella	District Councillor		High density housing estates are seen as unpopular, although not by those that live in them. The reality is that most properties will be overlooked, little open space, little parking provision and little green landscaping of any amenity value. There are examples across the district where development similar to this doesn't promote good design and amenity standards. Furthermore, it is understood that Hagley has one of the highest density in the district and given the previous lapse in development control, now results in any subsequent development uses this unfavourable density as a yard stick.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H2	36	Conrad	Palmer	Fairfield Village community Association		Far too many developments are high density, where gardens are small, and children are unable to play safely. Bromsgrove should aim to be a Green District, with space for children to develop and play safely, where families are not living on top of one another, a current situation that adds unnecessary strain to family life due "living in a pressure cooker".	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H2	42			Wythall Residents Association		The approach in Option 3 accords with the NPPF.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H2	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Considered that the Council should not overly rely on increasing residential densities within urban areas to accommodate housing needs. Urban intensification could result in an increase in flatted developments which would not deliver much needed family homes which will be required to come forward from greenfield developments.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H2	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	The Council should not rely overly on urban intensification and increasing densities to meet the identified housing need. The Consultation document sets out that there is insufficient brownfield land to meet needs and therefore this alone is insufficient to provide for the required need. The impact on amenity of future residents should also be considered when setting density standards, and the character of the District.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H2	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	Option 1 is not considered to be appropriate as the district is predominantly rural in nature, where there is an expectation that density will be lower – to increase density to one minimum density across the district would be harmful to local character.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H2	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	There is a clear opportunity to increase housing densities at locations close to public transport services (especially in the context of new settlements) in order to increase patronage, balanced against considerations of local distinctiveness and character.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	72	Stephen	Peters			The approach in Option 3 accords with the NPPF.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	78	Sean	Rooney	Harris Lamb	Barratt Homes	Both Option 1 & 2 could be helpful in ascertaining the quantum of land that will need to be made available to meet the districts housing needs as well as to meet the agreed portion of Birmingham's needs once this has been agreed.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	78	Sean	Rooney	Harris Lamb	Barratt Homes	Option 1 or Option 2 setting different densities for different parts of the District could be helpful in ascertaining the quantum of land that will need to be made available to meet the districts housing needs, as well as to meet the agreed portion of Birmingham's unmet needs when this is agreed.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	80	John	Pearce	Harris Lamb	Bloor Homes	The potential to develop a large SUE at Frankley would allow a site specific density to be established for the site, which could take account of the need to provide new public open space and amenity space, along with green infrastructure. In identifying specific target densities for certain sites it will help the Council in identifying the right amount of land that it needs to meet its needs of the Plan Period to meet its own housing needs but also its agreed proportion of Birmingham's unmet needs. Clearly, the location of the Frankley site on the edge of the built up area of Birmingham lends itself to potentially a slightly higher density than other sites on edge of the larger villages in the District for example. Furthermore, the promotion of sites by developers will assist in that an indication can be provided of the number of units that can be developed at a specific density, and which would provide the Council with reassurance that this will be deliverable.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H2	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Both Option 1 and Option 2 could be useful in ascertaining the quantum of land that will need to be made available to meet the District's housing need and an agreed portion of Birmingham's unmet needs.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Applying a blanket density across the District or setting different densities for different parts of the District will be helpful in ascertaining the quantum of land that will need to be made available to meet the District's housing needs, as well as to meet the agreed portion of Birmingham's unmet needs once this is agreed. Through masterplanning of potential sites undertaken by promoters, this will provide the Council with useful evidence when making decisions about how much land is needed and which sites they should release. Similarly, having evidence that these sites are deliverable and that there are no constraints to development should help with the decision making process.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Applying different density requirements across different parts of the District will be helpful in ascertaining the quantum of land that needs to be made available. Through masterplanning of potential sites undertaken by promoters, this will provide the Council with useful evidence when making decisions about how much land is needed.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	86	Rebecca	Anderson	Iceni Projects	Generator Developments	Setting a minimum density for greenfield sites in the District is more problematic. Ecology and landscape considerations will regularly lead to lower densities. In addition, suburban locations often lead to lower densities for marketing reasons. Setting a density requirement that was too high could make sites less deliverable, as developers are forced to include smaller units for which there might be a lower demand. Finally greenfield sites often have to deliver much higher levels of infrastructure than brownfield sites, which further limits the potential density of the site.	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>
H2	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>Section 11 of the NPPF emphasises the importance of ensuring that land is used in an efficient and effective manner. This approach is clearly supported, but determining the efficient use of land will be a matter of judgment, depending on the character of a site and the surrounding area.</p> <p>4.2 Recognising the diverse character of Bromsgrove District, it would not be appropriate to set a minimum density requirement for the District as a whole. Such an approach would have the potential to result in inappropriate development which may not reflect the local context. A sub district approach may have a similar outcome as it would fail to reflect the nature of individual sites.</p> <p>4.3 The density of development should reflect the local area and character (Option 3) whilst also being influenced by high quality design (Option 4). Any policy regarding the future density of development should therefore be framed around these considerations, without specifying a minimum density requirement which is unlikely to result in the most appropriate forms and patterns of development in the Bromsgrove District.</p>	<p>Comments welcomed and noted</p> <p>Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H2	136	Kathryn	Young	Turley	Land Fund	Development density should be considered on a site by site basis rather than through a density policy or a single broad density range. Whilst higher densities should be supported in suitable locations such as larger centres a prescriptive policy covering the whole District or different parts of the District is likely to compromise the delivery of housing development which provides a mix of house types. In turn, it may lead to developments which are unattractive to the homebuyer and may, in turn, affect the viability of development.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H2	137	Matthew	Fox	Turley	Redrow Homes	Appropriate residential densities need to be assessed and determined on a site by site basis rather than through a blanket density policy. Whilst higher densities should be supported in town centres which benefit from accessibility to key services and public transport, a prescriptive policy covering the whole District or even different parts of the District is likely to compromise the delivery of housing development which provides a mix of house types. In turn, it may lead to developments which are unattractive to homebuyers/the market and may, in turn, affect development viability.  If the LPR is to include a density policy, it should be specific to urban centres and public transport nodes (in line with paragraph 123a of the revised NPPF) and it must be sufficiently flexible in order to allow development to respond appropriately to its context and to remain viable.	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
H2	165	Johanna	Wood			Differing housing needs should have different minimum density requirements i.e. Affordable Housing and Homes for the Elderly should be more densely built than self build and Custom Housebuilding. All should respect option 3 and reflect option 4	Comments welcomed and noted  Densities will form an integral part of understanding the quantity of land that will need to be allocated. As part of our emerging evidence base, we may need to evaluate existing density levels achieved and what potential densities would be achievable and appropriate for future site allocations. We will also need to be mindful of the advice in the NPPG relating to densities and any possible changes to the guidance that may influence policy preparation.
<b>Q.H3: Do you think that we should continue to try and secure up to 40% affordable housing on development sites?</b>							
H3	1	Tammy	Williams	Alvechurch Parish Council		Yes	Comments welcomed and noted.  Affordable housing is an integral part of delivering a balanced supply of homes.  The level of affordable housing provision will need to take account of a number of factors, such as: - Number of households in affordable housing need - Housing needs of different groups - The range of affordable housing products available - Sizes, types and tenures - Analysis of affordable housing delivered to date - Viability (This list is not exhaustive)  As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	2	Gill	Lungley	Barnt Green Parish Council		Yes. Subject to local need being evidenced, efforts should be made to secure 40% affordable housing.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	4	Barry	Spence	Bentley Pouncefoot Parish Council		We would suggest between 30 – 40% affordable housing is appropriate and the developers should only provide less if the site is not financially viable at the required percentage.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	5	Kevin	Joyes	Beoley Parish Council		Should continue to strive for 40% affordable housing on new development sites. Not aware that Beoley Parish has any particular shortage of affordable housing.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	9	Alexandra	Burke	Hagley Parish Council		<p>Disappointed that a target of 40% affordable should only have produced an outcome of 29%. The threshold of 11 has the perverse incentive of encouraging builders to bring forward schemes of 9 or 10 houses with non affordable units. A threshold of 10 is appropriate where the target is 10% affordable. The appropriate threshold to go with a target of 40% is 3.</p> <p>Concentration of the need for affordable houses is in Bromsgrove &amp; Catshill. This seems to point to a lower affordable housing target in those large villages and a higher one in Bromsgrove. This need to concentrate provision in areas of demand again suggests accepting developer contributions in lieu of actual on-site provision in areas of lower need.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	20	P	Harrison	Wythall Parish Council		YES	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	33	Steve	Colella	District Councillor		The housing policy states up to 40% of housing should be affordable and despite political pressure this ceiling is reasonable (or in deed too high).	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	34	Sue	Baxter			No. I believe that there should be a minimum number of affordable residences for qualifying sites.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	35	Peter	King	Campaign to Protect Rural England		<p>We are disappointed to learn that delivery is as low as 28%, when the target is 40%. That target should be maintained. It is likely that the low delivery is due to:</p> <ul style="list-style-type: none"> <li>•The cost of decontaminating brownfield sites, which may reduce what is viable.</li> <li>•Sites where 9 houses or less are built. The threshold of 10 imposes a cliff-edge: on a site of 9 houses a builder will be able to build and sell 9 market houses. On a site of 10, he will only be able to build 6. The threshold of 10 in NPPF is a guideline, from which your council is entitled to depart. The threshold should be 3, as 40% of 3 is 1.2, so that a builder with a site for three houses should be able to provide one affordable one.</li> </ul>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	36	Conrad	Palmer	Fairfield Village community Association		40% should be the minimum. There is a dire need for housing that people can afford, far too many properties on the market are unaffordable. Most properties in Fairfield sell for over £380K, out of the price range for the average earner.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	37	Julie	O'Rourke	Tetlow King Planning	Housing Association Registered Providers Planning Consortium	<p>The timing of the Council's new Local Plan indicates a significant opportunity to be both proactive and imaginative in securing the delivery of affordable housing in the district; drawing upon best practice of RPs and embracing new and emerging delivery mechanisms. The standard practice of securing and maximising affordable housing through S106 planning obligations should be set at an appropriate level in accordance with a robust viability appraisal in accordance with the latest Planning Practice Guidance.</p> <p>Registered Providers working in partnership with LPAs can be the catalyst to significantly increasing the supply of affordable homes. We recommend that the Council engage directly with its local RPs, including our members, to set a local definition of affordable housing that will encourage delivery of a diverse range of affordable housing types that will meet local needs. As the presumption should always be in favour of on-site affordable housing delivery, the preference for early engagement with local RPs should be emphasised in the Plan.</p> <p>We recommend that when drafting the affordable housing policy that the words "up to" are not included within the policy wording. The wording of 'up to' is too imprecise and could fail to maximise affordable housing delivery and for the lack of clarity as to which schemes will be expected to deliver 'up to' a specific percentage. We encourage the Council to ensure that the future threshold is a set affordable housing target and include wording within the policy to encourage alternatives where a reduced percentage is anticipated, including consideration of alternative tenure mixes to improve viability.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	38	Sue	Green	Home Builders Federation		<p>As set out in the 2018 NPPF the LPR should set out the level and type of affordable housing provision require together with other infrastructure but such policies should not undermine the deliverability of the LPR (para 34). The cumulative burden of policy requirements should be set so that most sites are deliverable without further viability assessment negotiations (para 57).</p> <p>The Council should undertake an updated viability assessment to determine whether or not up to 40% affordable housing provision together with the cumulative burden of other policy requirements and necessary infrastructure provision remain viable and deliverable.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	42			Wythall Residents Association		Yes	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Any policy regarding affordable housing should include a mechanism for a reduced provision where there are issues of viability.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	<p>The Council should show, through their evidence base, that the required level and type of affordable housing provision is acceptable when considered with the other policy requirements and will not render schemes unviable.</p> <p>Any policy relating to affordable housing should set out a mechanism for reduced provision, if required.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	46	Ian	Mercer	Bruton Knowles	Church of England	Whether 40% affordable housing provision is viable on development sites is dependent on other infrastructure costs including S106 and CIL.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	48	Grace	Allen	CBRE	Arden Park Properties	Whilst the current policy for 40% affordable housing is appropriate for the housing requirement examined in the BDP 2017, this should be updated alongside the revised housing requirement (SHMA) to ensure that the evidence base is justified and up to date in accordance with NPPF paragraph 31. In addition to setting an appropriate affordable housing percentage target based on robust evidence, as part of any affordable housing policy, this should include reference to the need to also consider viability in determining the amount and nature of affordable housing (and other development contributions) able to be provided as part of specific developments. For example, the circumstances which applied at the time any viability evidence to inform the Plan was prepared may change over the course of the Plan period.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	The answer to this needs to be evidence based via an affordable housing needs assessment and subject to viability testing.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	The aim to seek 40% affordable housing on development sites is supported.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	57	Karin	Hartley	Delta Planning	Bloor Homes Western	We acknowledge that there is a significant housing need in the District and a growing affordability problem and are therefore generally supportive of a 40% affordable housing target. However, the provision of 40% affordable housing will not be viable on all sites, particularly where sites are faced with substantial infrastructure costs and this needs to be recognised in the Local Plan. A level of flexibility needs to be included to enable the Council to allow lower affordable housing provision on sustainable sites where viability concerns exist. The implementation of an affordable housing policy that is too inflexible could have an impact on the overall delivery of housing in the District and thereby on the number of affordable homes being built.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	58	Karin	Hartley	Delta Planning	Bloor Homes Western & Maximus	With regard to Question Q.H3 (affordable housing), we acknowledge that there is a significant housing need in the District and a growing affordability problem and are therefore generally supportive of a 40% affordable housing target. However, the provision of 40% affordable housing will not be viable on all sites, particularly where sites are faced with substantial infrastructure costs and this needs to be recognised in the Local Plan. A level of flexibility needs to be included to enable the Council to allow lower affordable housing provision on sustainable sites where viability concerns exist.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	68	Nicole	Penfold	Gladmans		Needs to be informed by updated evidence on need and viability. Need to update the viability assessment to ensure that 40% is still appropriate, needs testing in combination with all the proposed policy requirements to ensure the cumulative policy requirements still result in sites that are viable and deliverable. Should not just assume the % is still appropriate.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	69	Latisha	Dhir	GVA	St Phillips	Important to maintain flexibility to allow for changing local market circumstances and it is important that this is reflected within the policy wording. It is recommended that the level of affordable housing should be subject to viability considerations.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	72	Stephen	Peters			Yes	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	75	Rachel	Mythen	GVA	Taylor Wimpey	<p>The existing policy requirement should only be transferred into the new Local Plan if this is supported by up-to-date evidence, such as BDC's latest Strategic Housing Market Assessment (SHMA).</p> <p>It will be important to maintain flexibility to allow for changing local market circumstances and it is important that this is reflected within the policy wording. The level of affordable housing should be subject to viability considerations, given the overwhelming need to identify land for housing within the District.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	76	Emily	Vyse	GVA	University of Birmingham	The Council will need to re-assess its need for affordable housing against demand to determine whether 40% is appropriate. A new requirement will then need to be set accordingly.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	78	Sean	Rooney	Harris Lamb	Barratt Homes	We have no objection to the council continuing to secure 40% affordable housing on it should be considered as to whether this requirement could actually affect the viability of some developments and ask as a barrier to housing delivery.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	80	John	Pearce	Harris Lamb	Bloor Homes	Whilst we have no objection with the Council continuing to try and secure 40% affordable housing as there is a need for affordable homes in the District, their provision shouldn't be at the expense of other market housing coming forward. A flexible approach to securing affordable housing would be welcomed, particularly on larger sites where they may well be a range of other significant infrastructure requirements, that are needed in order to bring forward development.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	No objection with the Council continuing to try and secure 40% affordable housing, it should be considered as to whether this requirement could actually prevent the viability of some sites and act as a barrier to housing delivery. A more flexible application of the affordable housing requirement would be preferable, particularly where there are significant infrastructure requirements.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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H3	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Whilst there is no objection with the Council continuing to try and secure 40% affordable housing on development sites, would query whether this significant requirement doesn't actually have the opposite effect of deterring development coming forward. Clearly, there is a need for affordable homes in the District but their provision should not be at the expense of other market housing coming forward. Would, therefore, be keen to see a more flexible application of the affordable housing requirement to development sites, particularly where there are significant infrastructure requirements, that are needed in order to bring forward development.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Query whether 40% affordable housing requirement may deter development from coming forward. Provision should not be at the expense of market housing coming forward. Keen to see a more flexible application of the affordable housing requirement to development sites, particularly with significant infrastructure requirements.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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H3	86	Rebecca	Anderson	Iceni Projects	Generator Developments	Any affordable housing requirement would need to be justified by a viability assessment in the supporting evidence base as required by the NPPF. This has not yet been produced and thus we cannot comment on the appropriateness of the proposed affordable housing target.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	87			Indenture		Consider that 25% would be more appropriate and more deliverable. Proved in other Shire Districts a reduction in the Affordable Housing % to 30% or below delivers a higher level of Affordable Housing because there are less sites where the viability issue is challenged.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>The starting point for any assessment of affordable housing provision should be a robust assessment of affordable housing need within the District (contained within a Local Housing Needs Assessment which meets the requirements identified in ID Ref 2a-022-027 of the PPG).</p> <p>Having quantified the total need for affordable housing, consideration should be given to how this is to be met, through the implementation of an affordable housing requirement in the Bromsgrove District Plan. This will take the form of a percentage requirement, which may vary across the authority, depending on viability. Recognising the significant weight that the revised NPPF now places on viability assessments, any such requirement should be thoroughly tested to ensure that it would not undermine the viability (and deliverability) of development.</p> <p>At this time, no such evidence has been published by Bromsgrove District Council. It is therefore not possible to make any judgment on whether a 40% affordable housing requirement can be justified. There is no merit in simply rolling this requirement forward from the adopted Bromsgrove Local Plan on the basis that it is the current policy requirement. Indeed, the fact that this high level of provision has not been achieved<sup>7</sup> suggests that it may have contributed towards deliverability issues and that in the context of the new approach to viability testing at the plan-making stage (rather than planning application stage), it should therefore not be assumed.</p> <p>It is similarly not possible to determine the affordable housing tenure split that should be sought. However, in addressing this issue, careful consideration should be given to the broader definition of affordable housing (as contained in the revised NPPF), which now includes reference to starter homes and other affordable routes to home ownership. The local need for these types of affordable housing product should be considered, together with the impact on development viability. It is not known how the Council has been able to determine that starter homes are “likely to form at least 10% of all dwellings on site as part of our overall affordable housing contribution” (Issues and Options Consultation report paragraph 5.11). Any evidence that underpins this assertion should be made available for review and comment.</p> <p>This will need very careful consideration by Bromsgrove District Council to ensure that the need for all groups can be accommodated, so far as possible, but without undermining the delivery of “general” market housing. It might be that the importance of meeting the needs of certain groups might warrant an upward adjustment to the overall</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	94			Nigel Gough Associates	Aniston Ltd	<p>25% would be more appropriate and deliverable. Proved in other Shire Districts that a reduction in the affordable housing percentage to 30% or below delivers a higher level of affordable housing because there are less sites where the viability issue is challenged.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	95			Nigel Gough Associates	Monksgraston Ltd	We consider that 25% would be more appropriate and more deliverable. It has been proved in other Shire Districts that a reduction in the Affordable Housing percentage to 30% or below delivers a higher level of Affordable Housing because there are less sites where the viability issue is challenged.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	96			Nigel Gough Associates	Mr Stapleton	Consider that 25% would be more appropriate and deliverable. It has been proved in other Shire districts that a reduction in the affordable housing percentage to 30% or below delivers more affordable housing as less sites where viability is challenged.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	We consider that 25% would be more appropriate and deliverable. It has been proved in other Shire Districts that a reduction to 30% or below delivers a higher level of affordable housing because there are less sites where the viability issue is challenged.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	98	Sally	Oldaker			Yes – and more!	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	99	Mark	Dauncy	Pegasus	Gallagher Estates	BDC should satisfy itself that up to 40% affordable housing remains appropriate and viable.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	100	Ryan	Bishop			I think we should across all sites / areas look to develop the level of affordable housing required in the district – whether 40% is correct is hard to judge. Perhaps looking at different areas and their ability to support a larger or smaller amount of affordable housing based on the impact / demands on the local area.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	<p>The level of affordable housing needs to be addressed by appropriate strategic studies as the present level has not been revisited since the work on preparation for the existing district plan. Paragraph 31 of the NPPF makes it clear that preparation and review of policies needs to be underpinned by relevant and up-to-date evidence.</p> <p>Paragraph 61 of the NPPF asks that the different types of housing, including affordable housing be defined within the strategic total.</p> <p>In the context of the above it is considered inappropriate to table an express proportion of affordable housing until the evidence is marshalled.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	<p>The issue will always be one of viability and the effect of this requirement on housing deliverability. Has the Local Planning Authority carried out its own current viability appraisal to support this figure?</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	<p>At paragraph 5.9 the Council state that since 2011, 470 affordable housing units have been constructed – being 28.9% of all housing completions. Not only is this not good enough, this figure is misleading. The Council need to make it clear what the net completion figure is. That's is how many affordable homes have been delivered, taking account of losses under Right to Buy.</p> <p>The Council should also state here what the affordable housing need is: how many people are currently waiting for an affordable home in Bromsgrove District? Those are real people, in real need now. If their needs were to be met, how many homes would have to be built if the delivery rate of 28.9% was perpetuated?</p> <p>The 40% affordable housing level should be intrinsically linked to viability, which should be looked at as part of the 'whole plan viability'. It should also be driven by affordable housing need and genuine and objective consideration of what the council identifies as the 'housing affordability gap'.</p> <p>based on median wage growth not keeping pace with house price growth, the ratio of median earnings to median house prices has grown from 6.01 in 2002 to 8.00 in 2017. That means that prospective median-salaried purchasers will need 8 times their salary to be able to afford the median-priced house. They are therefore excluded from the market place.</p> <p>The council should publish how many affordable housing losses there have been and account for how many are likely to be lost in future, so that a sensible affordable housing target can be identified. The tenure mix should reflect reality with a sensible prediction of how much (genuine) take up there will be for intermediate or market affordable properties given how expensive market housing now is.</p> <p>Having regard to viability, the % of affordable housing within developments should be linked to an OAN that reflects a serious and sensible strategy to 'stabilise' house prices in the District, whilst maintaining 'whole plan' viability. Without this consideration, the overall proportion is academic.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	<p>Having regard to viability, the % of affordable housing within developments should be linked to an OAN that reflects a serious and sensible strategy to 'stabilise' house prices in the District, whilst maintaining 'whole plan' viability. Without this consideration, the overall proportion is academic</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of H3, the 40% affordable housing level should be intrinsically linked to viability, which we consider should be looked at as part of the 'whole plan viability'. But it should also be driven by affordable housing need and genuine and objective consideration of what the council identifies as the 'housing affordability gap' (paragraph 5.13).	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	112	Gareth	Sibley	RCA Regeneration	Piper Group	<p>The 40% affordable housing level should be intrinsically linked to viability - which we consider should be looked at as part of the whole plan viability. Should also be driven by affordable housing need and genuine consideration of the affordability gap. Within Bromsgrove prospective median-salaried purchasers will need 8 times their salary to be able to afford the median priced house and they are excluded from the market place. The Council should publish how many affordable housing losses there have been and account for how many are likely to be lost in the future. Tenure mix should reflect reality with a sensible prediction of how much genuine take up there will be for intermediate or market affordable properties.</p> <p>The % of affordable housing within developments should be linked to an OAN that reflects a sensible strategy to stabilise house prices in the District, whilst maintaining whole plan viability.</p> <p>The Council need to make it clear what the net completion figure is - how many affordable homes have been delivered, taking account of losses under Right to Buy. Council should also state here what the affordable housing need is. How many people are currently waiting for an affordable home in the District.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	113	Gareth	Sibley	RCA Regeneration	CAD Square	<p>At paragraph 5.9 the Council state that since 2011, 470 affordable housing units have been constructed – being 28.9% of all housing completions. Not only is this not good enough, this figure is misleading. The Council need to make it clear what the net completion figure is. That's is how many affordable homes have been delivered, taking account of losses under Right to Buy.</p> <p>The Council should also state here what the affordable housing need is: how many people are currently waiting for an affordable home in Bromsgrove District? Those are real people, in real need now. If their needs were to be met, how many homes would have to be built if the delivery rate of 28.9% was perpetuated?</p> <p>In respect of H3, the 40% affordable housing level should be intrinsically linked to viability, which we consider should be looked at as part of the 'whole plan viability'. But it should also be driven by affordable housing need and genuine and objective consideration of what the council identifies as the 'housing affordability gap'.</p> <p>The council should publish how many affordable housing losses there have been and account for how many are likely to be lost in future, so that a sensible affordable housing target can be identified.</p> <p>Having regard to viability, the % of affordable housing within developments should be linked to an OAN that reflects a serious and sensible strategy to 'stabilise' house prices in the District, whilst maintaining 'whole plan' viability. Without this consideration, the overall proportion is academic.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	<p>Should be based on a range of factors, including local needs and development viability , taking into account the number of sites to be allocated. The total supply of affordable homes since 2011 has been 28.9% since 2011, this might suggest that 40% is too high. There is potential to deliver more affordable homes in total across a greater number of qualifying sites.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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H3	118	Meghan	Rossiter	Tetlow King	Rentplis UK Ltd	<p>The Council should be seeking to be as ambitious as it can in setting a whole-plan affordable housing target, percentage requirement and threshold(s) for delivering affordable housing from all viable developments.</p> <p>The Government's small sites guidance set out in the Planning Practice Guidance is guidance only, and not policy; as a material consideration it does not prevent the Council from taking a different view in its plan-making. Our experience with other local planning authorities, and the approach being taken by the Planning Inspectorate at appeal, highlights that it is the particular circumstances of each local planning authority that guides whether small sites should contribute to delivering affordable housing.</p> <p>It is an opportune time for the Council to robustly test whether small sites may viably deliver sufficiently high quantities of affordable housing across Bromsgrove to meet a greater level of need such that it would be appropriate to set a lower threshold for requiring affordable housing delivery. Should this not be the case it may be appropriate for the Council to consider a wider housing land supply review to deliver a greater overall level of housing that may deliver greater numbers of affordable housing.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	119	Darren	Oakley	RPS Group	Gleeson	<p>RPS are of the view that an appropriate percentage contribution should be based on a range of factors, including local needs and development viability, taking into the number of sites to be allocated. Given that the total supply of affordable homes has been 28.9% since 2011, this might suggest that 40% is set too high and so, in practical terms, should be reduced. Given the BDP will have to allocate a significant increase in housing sites, distributed across the district, then there is potential to deliver more affordable homes in total across a greater number of qualifying sites (sites of 11 or more dwellings).</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	120	Michael	Davies	Savills	Cala Homes	Should be supported by appropriate evidence and include a clause ensuring that affordable housing requirement being sought by the policy is subject to viability in accordance with NPPF Para 34. Viability assessment is highly sensitive to changes in its inputs . The Plan Review should take appropriate evidence and development viability into consideration when setting affordable housing policies.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	122	Michael	Davies	Savills	Landowners	We consider that any affordable housing policy introduced through Bromsgrove District Local Plan Review should be supported by appropriate evidence and include a clause ensuring that the affordable housing requirement being sought by the policy is subject to viability. This is to ensure that it is taken into account that every development site is different.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	123	Michael	Burrows	Savills	Landowners	It is considered that any affordable housing policy introduced through the Bromsgrove District Local Plan Review should be supported by appropriate evidence and include a clause ensuring that the affordable housing requirement being sought by the policy is subject to viability. The Plan-making process should be ensuring that the Local Plan includes policies that positively promote deliverable and viable development proposals on suitable sites in the District. The evidence base for the Local Plan therefore needs to take affordable housing need and site viability into consideration when setting the affordable housing policies.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	124	Robert	Lofthouse	Savills	Taylor Wimpey	The percentage of affordable needs to be based on viability. We would expect the Council's evidence base and District Plan Review to provide evidence for viability assessment and assumptions to ensure that a viable proportion of affordable homes are delivered.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	134	David	Barnes	Star Planning	Richborough Estates	Whether a target of 40% of all dwellings on sites being developed for affordable housing purposes is a matter for further testing via the viability appraisal which will be necessary to support the Local Plan.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	136	Kathryn	Young	Turley	Land Fund	<p>The proportion of affordable housing to be delivered should be informed by the Strategic Housing Market Assessment or, if one has been completed, a Local Housing Needs Assessment together with site specific development viability.</p> <p>It is critical that policies are applied flexibility in order to ensure that development is not unduly burdened and this does not delay or prevent sites from being delivered. If sites cannot be delivered due to overly onerous policy requirements, the Council may find itself in a position where it is unable to demonstrate a five year housing land supply as required by national planning policy. If the Council is unable to demonstrate a five year housing land supply the Council may be unable to defend applications for residential development which do not accord with its preferred spatial strategy.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	137	Matthew	Fox	Turley	Redrow Homes	<p>The proportion of affordable housing to be delivered will need to be informed by the local housing needs assessment including a detailed assessment of viability.</p> <p>Flexibility is needed to ensure that development is not unduly burdened by policy requirements.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	156	Fred	Carter			<p>Rather than try to obtain 40% affordable housing provision this should be insisted upon. Viability assessments have been widely discredited and only serve to artificially increase land values. Any "difficult to develop" sites due to ground conditions should be compulsory purchased by the local authority and any available monies utilised for the provision of Council Housing which should be re-introduced immediately.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	161	Ian	Macpherson		Self	Yes on sites of 5+ bear in mind that only achieved 28% overall in the past.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	165	Johanna	Wood			Yes	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	166	John	Gerner			You should try to secure at least 40%.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	176	Mr & Mrs J D	Winslow			The question of the proportion of affordable housing on each development site must inevitably depend on the calculated need but also on the size of the site, allied with its access to services and transport, which are of particular importance to those in need of such housing.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	179	Neil	Gow	Burcot Garden Centre	Self	No. It is unrealistic to seek to impose this policy as it wastes otherwise potential sites which could come forward more quickly.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	184	Nina and Ray	Read			Essential adequate social housing factored in and with related facilities - often overlooked by the developers on completion.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H3	190	Philip	Ingram			BDC should undertake an updated viability assessment to determine if 40% affordable housing along with other policy requirements/infrastructure provision remains viable and deliverable.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
H3	192			Dodford with Grafton Parish Council		Not an expert; however, affordability is a relative term, not an absolute one, so encouraging the development of a high earning community would help to raise the standards of housing. Having said that, housing for essential workers is vital, and the notion of a 'starter home' may be a more positive one than that of a low pay 'ghetto' which has been shown to have detrimental effects on personal development, education, crime and employment.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes.</p> <p>The level of affordable housing provision will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Number of households in affordable housing need</li> <li>- Housing needs of different groups</li> <li>- The range of affordable housing products available</li> <li>- Sizes, types and tenures</li> <li>- Analysis of affordable housing delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing and any possible changes to the guidance that may influence policy preparation.</p>
Q.H4: Do you think the social rented / intermediate housing split is appropriate? If not, why not?							

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H4	1	Tammy	Williams	Alvechurch Parish Council		Yes	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	4	Barry	Spence	Bentley Pauncefoot Parish Council		The split seems appropriate given the number of households on the Council's waiting list.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	5	Kevin	Joyes	Beoley Parish Council		Should continue to strive for 40% affordable housing on new development sites. The current social rented/intermediate housing split is appropriate. Affordable housing should be pepper potted within developments. Homes should be built for private rent within the District. Not aware that Beoley Parish has any particular shortage of affordable housing.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	9	Alexandra	Burke	Hagley Parish Council		Intermediate tenures should be encouraged.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	20	P	Harrison	Wythall Parish Council		YES	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	34	Sue	Baxter			Yes	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	35	Peter	King	Campaign to Protect Rural England		No strong view, but intermediate tenures are to be encouraged and they help to raise the overall “affordable” target.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	36	Conrad	Palmer	Fairfield Village community Association		There should be a mandatory minimum of 70% for Social Housing to rent (not part ownership). More should be done to encourage young people/families to reside in homes across the District, to help create sustainable communities.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	37	Julie	O'Rourke	Tetlow King Planning	Housing Association Registered Providers Planning Consortium	The revised NPPF (2018) has introduced a number of new affordable housing tenures into the definition in Annex 2. These new tenures mean that the Council cannot rely upon a straight rent and sale split in its new policies and as all policies "should be underpinned by relevant and up-to-date evidence" (NPPF paragraph 31, 2018) a new SHMA that will reflect the new tenure types should be completed as a priority to ensure that the Council's policy position properly reflects local need and maximises delivery.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	38	Sue	Green	Home Builders Federation		Housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (2018 NPPF para 31). The housing needs for different groups should be assessed to justify the appropriate social rented / intermediate housing split.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	42			Wythall Residents Association		Yes	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	46	Ian	Mercer	Bruton Knowles	Church of England	This is dependent on local need, and should be assessed as part of the Plan review.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	The affordable housing split will be established by Bromsgrove through further detailed work on viability and affordability as the Plan Review evolves	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	68	Nicole	Penfold	Gladmans		Needs to be underpinned by up to date robust evidence, should have some flexibility rather than a rigid split.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	72	Stephen	Peters			Yes	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	78	Sean	Rooney	Harris Lamb	Barratt Homes	Paragraph 31 stipulates that housing policies should be underpinned by relevant and up to date evidence. On this basis the 70%/30% split should be justified through appropriate assessment. As with the affordable housing requirement above, we would like to see some flexibility in how the tenure split is applied so that there is scope to negotiate and agree something different if circumstances change dictate otherwise.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	80	John	Pearce	Harris Lamb	Bloor Homes	The 70%/30% split is helpful and clearly preferable to a higher proportion of social rented units being required. However, as above a flexible approaching how the tenure split is applied so that there is scope to negotiate and agree something different if circumstances dictate the need for divergence away from the stated requirement. Similarly, if it can demonstrate that a specific tenure mix would make development unviable for example, then we would like to be able to agree a variation to the policy requirement.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	The 70% / 30% split should be justified through appropriate assessment. We would like to see flexibility in how the tenure split is applied so there is scope to negotiate where circumstances dictate the need for divergence away from the stated requirement.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	The 70%/30% split is helpful and clearly preferable to a higher proportion of social rented units being required. However, would like to see some flexibility in how the tenure split is applied so that there is scope to negotiate and agree something different if circumstances dictate the need for divergence away from the stated requirement.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Like to see some flexibility in how the tenure split is applied so that there is scope to negotiate .	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	87			Indenture		Should seek to meet the eider needs of the public in the Affordable Housing sector in line with other local Authorities.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>The starting point for any assessment of affordable housing provision should be a robust assessment of affordable housing need within the District (contained within a Local Housing Needs Assessment which meets the requirements identified in ID Ref 2a-022-027 of the PPG).</p> <p>Having quantified the total need for affordable housing, consideration should be given to how this is to be met, through the implementation of an affordable housing requirement in the Bromsgrove District Plan. This will take the form of a percentage requirement, which may vary across the authority, depending on viability. Recognising the significant weight that the revised NPPF now places on viability assessments, any such requirement should be thoroughly tested to ensure that it would not undermine the viability (and deliverability) of development.</p> <p>At this time, no such evidence has been published by Bromsgrove District Council. It is therefore not possible to make any judgment on whether a 40% affordable housing requirement can be justified. There is no merit in simply rolling this requirement forward from the adopted Bromsgrove Local Plan on the basis that it is the current policy requirement. Indeed, the fact that this high level of provision has not been achieved<sup>7</sup> suggests that it may have contributed towards deliverability issues and that in the context of the new approach to viability testing at the plan-making stage (rather than planning application stage), it should therefore not be assumed.</p> <p>It is similarly not possible to determine the affordable housing tenure split that should be sought. However, in addressing this issue, careful consideration should be given to the broader definition of affordable housing (as contained in the revised NPPF), which now includes reference to starter homes and other affordable routes to home ownership. The local need for these types of affordable housing product should be considered, together with the impact on development viability. It is not known how the Council has been able to determine that starter homes are “likely to form at least 10% of all dwellings on site as part of our overall affordable housing contribution” (Issues and Options Consultation report paragraph 5.11). Any evidence that underpins this assertion should be made available for review and comment.</p> <p>This will need very careful consideration by Bromsgrove District Council to ensure that the need for all groups can be accommodated, so far as possible, but without undermining the delivery of “general” market housing. It might be that the importance of meeting the needs of certain groups might warrant an upward adjustment to the overall</p>	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	94			Nigel Gough Associates	Aniston Ltd	<p>The district should seek to meet the wider needs of the public in Affordable Housing sector in line with other local authorities.</p>	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	95			Nigel Gough Associates	Monksgraston Ltd	The District should seek to meet the wider needs of the public in the Affordable Housing sector in line with other local authorities, i.e. Birmingham.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	96			Nigel Gough Associates	Mr Stapleton	Should seek to meet the wider needs of the public in the affordable housing sector in line with other authorities, i.e. Birmingham.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	The District should seek to meet the wider needs of the public in the affordable housing sector in line with other local authorities, i.e. Birmingham.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	The issue will always be one of viability and the effect of this requirement on housing deliverability. Has the Local Planning Authority carried out its own current viability appraisal to support this figure?	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	115	John	Breese	Rosconn Strategic Land		When considering the split between social rented/intermediate housing regard should be given to NPPF paragraph 64 which expects at least 10% of the homes to be available for affordable home ownership in major schemes subject to some exemptions that are listed.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	118	Meghan	Rossiter	Tetlow King	Rentplis UK Ltd	<p>With regards to the circumstances in which affordable housing is sought, the Government has now published NPPF2, containing within it new policies relating to the assessment of housing needs, the tenures of affordable housing that local planning authorities must assess and seek to deliver, and the circumstances in which it can require this. It is important in light of this revised Framework that the Council consider how its policies will be used in determining planning applications in the long term, assessing the need and planning for the delivery of the new, wider types of affordable housing to meet local housing needs.</p> <p>For the new District Plan to be effective over the long term the Council should look to encourage a wide range of affordable housing, with its policies and supporting text reflecting the new Framework phrasing which seeks to deliver a greater overall level of affordable housing to meet needs. The new definitions recognise that delivery of social and affordable rented housing needs to be alongside other forms of housing, enabling more families to stay in areas they wish to live in and from which they can build up savings.</p> <p>The delivery of rent to buy alongside other rented and sale tenures delivers tangible benefits to local people, housing associations and local authorities by meeting needs that would otherwise go unmet by the core range of social and affordable rent, and intermediate home ownership tenures. As set out in our earlier comments, the ability to save for a deposit is significantly constrained for many by renting in private rented accommodation, while access to other affordable tenures can be constrained by existing debts. The period of rent (capped at the lower of Local Housing Allowance or 80% of private rents) provides ample time to build up a good credit history and to save for a mortgage deposit, opening up the opportunity of purchase for many more people. This provides a clear benefit when delivered alongside other rented and ownership tenures, delivering more genuinely mixed and balanced communities and enabling a greater number of people to access housing and get off the local housing waiting list.</p>	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	124	Robert	Lofthouse	Savills	Taylor Wimpey	Ultimately, this needs to reflect housing needs, taking account of viability.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	134	David	Barnes	Star Planning	Richborough Estates	As per answer to H3, the same consideration applies to the tenure split between affordable housing provision.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	136	Kathryn	Young	Turley	Land Fund	The housing tenure mix should be assessed on a site by site basis to ensure flexibility and to allow the most suitable homes to be delivered in the most appropriate locations.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	137	Matthew	Fox	Turley	Redrow Homes	The housing tenure mix should be considered as part of the local housing needs assessment and, more locally, through NDP evidence. However, policies must be sufficiently flexible in order to ensure that the right homes are delivered in the right locations having regard to site constraints and character. Medium and large scale housing allocations are most likely to deliver a range of housing tenures.	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H4	161	Ian	Macpherson		Self	This needs research into the demand	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	165	Johanna	Wood			<p>Should increase the social rented % to 80%.</p> <p>This assumes that the priority is for homes for those on the housing list.</p> <p>And don't these people also have the option to purchase at some point anyway?</p>	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>
H4	192			Dodford with Grafton Parish Council		<p>Not an expert; however, affordability is a relative term, not an absolute one, so encouraging the development of a high earning community would help to raise the standards of housing. Having said that, housing for essential workers is vital, and the notion of a 'starter home' may be a more positive one than that of a low pay 'ghetto' which has been shown to have detrimental effects on personal development, education, crime and employment.</p>	<p>Comments welcomed and noted.</p> <p>Tenure split of affordable housing is an integral part of affordable housing delivery.</p> <p>Tenure split will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Housing needs of different people</li> <li>- The range of affordable housing products available</li> <li>- Analysis of existing tenure split delivered to date</li> <li>- Viability</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to demonstrate the intricacies associated with local housing need, of which tenure split is one. We will also need to be mindful of updated advice in the NPPG relating to local housing need and any possible changes to the guidance that may influence policy preparation.</p>

**Q.H5: Do you think we should continue to have small 'clusters' of affordable housing properties or 'pepper-pot' them within development schemes? What is the reason for your response?**

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H5	1	Tammy	Williams	Alvechurch Parish Council		Pepper potting may encourage social interaction (an inspirational wish) but may well lead to social tension in some cases. Mixed developments would require careful management and monitoring – for example, systems need to be in place to maintain streets, public spaces and parking areas. Suggest further research is required.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	4	Barry	Spence	Bentley Pouncefoot Parish Council		Experience in other authorities seems to indicate small clusters of affordable housing are preferable. This makes housing management easier and also lessens the potential for neighbour disputes. One of our residents reports a development where open market purchasers strongly and openly resented the presence of Registered Social Housing tenants in neighbouring houses.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	5	Kevin	Joyes	Beoley Parish Council		Affordable housing should be pepper potted within developments.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>

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H5	9	Alexandra	Burke	Hagley Parish Council		Clusters should be small. Prices of adjoining houses are likely to be slightly depressed, which may have the effect of improving the affordability of market housing.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	20	P	Harrison	Wythall Parish Council		Affordable properties should be dispersed in “pepper-pot” fashion on new developments. This reduces any possible stigma and encourages integration of families within the community.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	34	Sue	Baxter			Yes	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H5	35	Peter	King	Campaign to Protect Rural England		Pepper potting is desirable, as likely to enhance social cohesion. It is notorious that monolithic council estates tend to be area troubled by anti-social behaviour, so that such are to be avoided.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	36	Conrad	Palmer	Fairfield Village community Association		Pepper-pot them within development schemes. By having mixed communities' aspiration and standards increase. No person is left behind or receives what some perceive as unfavourable treatment because of the area where they live and the social background that they are from.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	37	Julie	O'Rourke	Tetlow King Planning	Housing Association Registered Providers Planning Consortium	It is our experience that where tenures are to be broken up, the preference is to cluster affordable housing in small groups across a development, with an optimal size of up to 12 dwellings. Clustering small numbers of affordable houses in this way allows for more efficient and effective management and maintenance of the dwellings.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H5	42			Wythall Residents Association		Affordable properties should be dispersed in “pepper-pot” fashion on new developments. This reduces any possible stigma and encourages integration of families within the community.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Recommend that development proposals include small scale clustering of affordable housing,	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	Agree with the strategy of small clusters of ‘tenure blind’ affordable housing within development. This allows for the affordable housing to be spread around the Site while still allowing for maintenance.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H5	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	Yes, small clusters tend to be preferred by the Registered Providers from a maintenance point of view. Providing schemes are tenure blind in every way, it should not be possible to differentiate between open market housing and affordable housing.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	72	Stephen	Peters			Affordable properties should be dispersed in “pepper-pot” fashion on new developments. This reduces any possible stigma and encourages integration of families within the community.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	78	Sean	Rooney	Harris Lamb	Barratt Homes	Both approaches to the distribution of affordable units within development schemes have benefits and limitations. It would be preferable to have no requirements in policy terms to do one or the other and for the location of affordable homes to be agreed through the development management process. Our view is that it should be down to the registered providers to dictate where they want their affordable units within a scheme as they will have to manage it.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H5	80	John	Pearce	Harris Lamb	Bloor Homes	BHW do not object in principle to the requirement to pepper pot affordable housing within development schemes as they contend that it can contribute to creating sustainable communities. The feedback that BHW receive from RPs who purchase the affordable housing elements within their developments is that their preference is to provide the units in small clusters, preferably 15-20 units are generally appropriate. The reason being is that from a management and maintenance position, it makes matter much easier. As such, we would resist a requirement of affordable housing units to be pepper potted.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Both approaches have benefits and limitations. It would be preferable to have no specific requirement in policy terms to do one or the other, but to be agreed through development management. It should be for the registered providers to dictate where they want their affordable units to be located within a scheme.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Only clusters should be sought. Pepper potting is inefficient and can actually delay delivery of affordable housing as Regulated Providers prefer larger groups.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H5	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Only clusters should be sought.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	87			Indenture		Clusters are much better, particularly for maintenance by RSLs.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	94			Nigel Gough Associates	Aniston Ltd	Clusters are much better, particularly for maintenance by RSLs.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>

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H5	95			Nigel Gough Associates	Monksgraston Ltd	Clusters are much better, particularly for maintenance by Registered Providers with the requirement that they be "tenure blind".	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	96			Nigel Gough Associates	Mr Stapleton	Clusters are better, particularly for maintenance by registered providers with the requirement that they be "tenure blind".	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	Clusters are much better, particularly for maintenance by registered providers with the requirement that they be 'tenure blind'.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	98	Sally	Oldaker			I think you should 'pepper-pot' – if it's a cluster then the occupants can get stigmatised. It's much better to have people from different backgrounds living near each other, as this will improve communities and understanding.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>

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H5	106	Phillip	Woodhams	Phillip Woodhams	Billingham & Kite Ltd	Pepper potting does not represent good estate management from the point of view of affordable housing providers and it is considered that the benefits that may accrue seem tenuous at best. Planning is required to be evidence based - where is the evidence of benefits accruing from pepper potting.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Effective management prefers clusters of affordable housing	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	120	Michael	Davies	Savills	Cala Homes	Location of affordable housing within development schemes should be assessed on a site-by-site basis. If a blanket policy is adopted this could lead to greater inflexibility and be deemed obtrusive to development.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	122	Michael	Davies	Savills	Landowners	Although Bromsgrove District should endeavour to achieve the creation of inclusive and mixed communities as referenced by Planning Practice Guidance ('PPG'), we consider that location of affordable housing within development schemes should be assessed on a site-by-site basis. All development sites have different site contexts and different site specific circumstances such as heritage, flooding and local designations. If a blanket policy is adopted by Bromsgrove for either 'pepper-potting' or 'clustering' of affordable homes, this could lead to greater inflexibility.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H5	123	Michael	Burrows	Savills	Landowners	Although BDC should endeavour to achieve the creation of inclusive and mixed communities as referenced by Planning Practice Guidance, we contend that the location of affordable housing within development schemes should be assessed on a site-by-site basis and should be sufficiently flexible to be able to take into account the management and delivery requirements of affordable housing providers and developers, whose views should be sought and taken into consideration as part of the Local Plan process.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	124	Robert	Lofthouse	Savills	Taylor Wimpey	Reasonable-sized clusters are preferred by affordable housing providers, for ease of management and delivery. Taylor Wimpey recognise the need for tenure blindness and creating balanced and mixed communities.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	134	David	Barnes	Star Planning	Richborough Estates	Clustering of affordable housing which would be managed by a Registered Landlord (or another recognised organisation) remains appropriate. However, there should be greater flexibility about the size of the clusters to recognise factors such as ease of management and phasing of larger developments which can affect delivery rates for affordable housing (i.e. it can be a bit lumpy which may influence the size and location of clusters).	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	136	Kathryn	Young	Turley	Land Fund	Our client supports the Council's preference for small clusters of affordable housing. From a housing maintenance (i.e. mowing communal grassed areas) and deliverability perspective it is easier if affordable housing properties are clustered together. Our client recommends that properties should be clustered in groups of 6 – 12 units.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>



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H5	137	Matthew	Fox	Turley	Redrow Homes	Redrow support "small clusters" of affordable housing as registered providers will only manage clusters of 6-12 units to ensure affordable housing is viable.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	161	Ian	Macpherson		Self	Pepper-pot to avoid ghettos	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	165	Johanna	Wood			Both strategies are valid and its not an either or . It would depend on each individual development as to which approach was most suitable	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	166	John	Gerner			Yes	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>

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H5	176	Mr & Mrs J D	Winslow			Any “clusters” of affordable housing will, hopefully, not attain a size which could potentially generate social problems. “Pepper potting” may seem to be the answer but, here too, there may be problems - of integration. Very careful planning judgements about the proportion/siting/environmental setting/design of such housing provision are necessary.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	180	Nicholas	Rands			I think you should ‘pepper-pot’ them within development schemes to achieve more integration. BUT there should be strict rules on maintenance and up keep of ALL properties on a development. This may mean having a specific maintenance person or team for the development. This would mean that affordable rented properties, for instance, are not stigmatised, in fact it may encourage privately owned properties to be better maintained.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
H5	192			Dodford with Grafton Parish Council		Not an expert; however, affordability is a relative term, not an absolute one, so encouraging the development of a high earning community would help to raise the standards of housing. Having said that, housing for essential workers is vital, and the notion of a ‘starter home’ may be a more positive one than that of a low pay ‘ghetto’ which has been shown to have detrimental effects on personal development, education, crime and employment.	<p>Comments welcomed and noted.</p> <p>Dispersal of affordable housing on sites of mixed tenures will be important in terms of creating strong sustainable communities.</p> <p>Dispersal will need to take account of a number of factors, such as:</p> <ul style="list-style-type: none"> <li>- Timing of affordable housing delivery</li> <li>- Benefits and limitations of different dispersal techniques</li> <li>- Understanding of management/ maintenance issues facing RSLs</li> </ul> <p>(This list is not exhaustive)</p> <p>As part of our emerging evidence base, we will need to take account of government guidance such as 'A new deal for social housing' to inform policy preparation.</p>
<b>Q.H6: Do you think we should allocate a proportion of the affordable housing for essential workers?</b>							
H6	1	Tammy	Williams	Alvechurch Parish Council		proportion yes, as long as the LA enforces its affordable housing provision %	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H6	2	Gill	Lungley	Barnt Green Parish Council		Yes. A proportion of affordable housing should be allocated for essential workers.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	4	Barry	Spence	Bentley Pouncefoot Parish Council		We would support this proposal.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	8	Nancy	Bailey	Frankley Parish Council		Affordable accommodation for single persons (nurses, trainee NHS workers, students etc.) is important on key transport links including cycle routes, buses and trains. Adequate provision should be given to the storage of bikes.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	9	Alexandra	Burke	Hagley Parish Council		Depends on whether there are difficulties in recruiting them. Anecdotal evidence doesn't suggest that key workers have a difficulty in finding and affording reasonable accommodation in the area.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H6	20	P	Harrison	Wythall Parish Council		NO	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	34	Sue	Baxter			Yes	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	35	Peter	King	Campaign to Protect Rural England		These may be desirable objectives. Ensuring that they are fulfilled will be laudable, but it should not be necessary to allocate sites specifically for them.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	36	Conrad	Palmer	Fairfield Village community Association		Housing availability should, in the first place, be allocated to local workers.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H6	42			Wythall Residents Association		No	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	72	Stephen	Peters			NO	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	78	Sean	Rooney	Harris Lamb	Barratt Homes	Affordable and social calculations should be justified through appropriate assessment. While we have no objection to the principle of this we query how you would define an essential worker and how you would control occupancy.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	80	John	Pearce	Harris Lamb	Bloor Homes	We have no objection in principle to this but query how in practice this would be done. If the objective is to provide affordable housing for essential workers could this not be done by allowing a greater percentage of low cost market homes on sites, which could then be marketed to essential workers?	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H6	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Much like affordable or social housing calculations, these should be justified through appropriate assessment. We query how you would define an essential worker and how you would control occupancy of such units on an ongoing basis. Would it be easier to allow more discounted market units instead.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	No objection in principle to this although would query how one would define what an essential worker is and how an RP would control occupancy of such units on an ongoing basis. Would it not be easier to allow more discounted market units instead?	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	No objection in principle, but query how an essential worker is defined and how an RP would control occupancy of such units. Would it be easier to allow more discounted market units instead?	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H6	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>The starting point for any assessment of affordable housing provision should be a robust assessment of affordable housing need within the District (contained within a Local Housing Needs Assessment which meets the requirements identified in ID Ref 2a-022-027 of the PPG). Having quantified the total need for affordable housing, consideration should be given to how this is to be met, through the implementation of an affordable housing requirement in the Bromsgrove District Plan. This will take the form of a percentage requirement, which may vary across the authority, depending on viability. Recognising the significant weight that the revised NPPF now places on viability assessments, any such requirement should be thoroughly tested to ensure that it would not undermine the viability (and deliverability) of development.</p> <p>At this time, no such evidence has been published by Bromsgrove District Council. It is therefore not possible to make any judgment on whether a 40% affordable housing requirement can be justified. There is no merit in simply rolling this requirement forward from the adopted Bromsgrove Local Plan on the basis that it is the current policy requirement. Indeed, the fact that this high level of provision has not been achieved<sup>7</sup> suggests that it may have contributed towards deliverability issues and that in the context of the new approach to viability testing at the plan-making stage (rather than planning application stage), it should therefore not be assumed.</p> <p>It is similarly not possible to determine the affordable housing tenure split that should be sought. However, in addressing this issue, careful consideration should be given to the broader definition of affordable housing (as contained in the revised NPPF), which now includes reference to starter homes and other affordable routes to home ownership. The local need for these types of affordable housing product should be considered, together with the impact on development viability. It is not known how the Council has been able to determine that starter homes are “likely to form at least 10% of all dwellings on site as part of our overall affordable housing contribution” (Issues and Options Consultation report paragraph 5.11). Any evidence that underpins this assertion should be made available for review and comment.</p> <p>This will need very careful consideration by Bromsgrove District Council to ensure that the need for all groups can be accommodated, so far as possible, but without undermining the delivery of “general” market housing. It might be that the importance of meeting the needs of certain groups might warrant an upward adjustment to the overall</p>	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	98	Sally	Oldaker			<p>Maybe some of it, but how do you classify ‘essential’??</p>	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	<p>Is this an issue for policy? Extremely detailed point, not helpful at this stage. How do we know ‘essential workers’ want to live in a particular location?</p>	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H6	118	Meghan	Rossiter	Tetlow King	Rentplis UK Ltd	A general improvement in the delivery of affordable housing will mean that essential workers and others have more choice in terms of affordable housing options. Rent to buy helps in meeting these needs, as shown by the people already benefiting from living in Rentplus homes. Further details are set out on the Rentplus website via <a href="http://www.rentplus-uk.com/about/local-authorities">http://www.rentplus-uk.com/about/local-authorities</a> , clearly showing the benefits for essential workers, including those working in the public sector, armed forces and other areas. Now fully recognised and incorporated within the NPPF, it is clear that the Council may target affordable housing provision at meeting key housing needs.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	124	Robert	Lofthouse	Savills	Taylor Wimpey	This will be incorporated in delivery by registered housing providers.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	134	David	Barnes	Star Planning	Richborough Estates	Several years ago, key workers accommodation did form part of the affordable housing provision. The reinstatement of this type of affordable home would be a reasonable approach to adopt subject to the eligibility criteria being clear. If there is no interest from the eligible occupiers after a period of say 3 months then these properties should become available to anyone in need of affordable housing. There is no merit in keeping the dwellings vacant in the hope of a future essential worker needing the accommodation when demand exists from other people in need of a home.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	161	Ian	Macpherson		Self	Yes in order to encourage a sustainable mix	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H6	165	Johanna	Wood			No: This is discriminatory. Why should affordable housing be limited primarily to public sector employees? There are many private sector employees both in essential worker roles and other positions who are equally needy of housing. What happens if they leave that role/career ? Do they become homeless? It is likely to be a bureaucratic and management nightmare.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	166	John	Gerner			Yes	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	180	Nicholas	Rands			No, this is taking discrimination too far.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
H6	192			Dodford with Grafton Parish Council		Not an expert; however, affordability is a relative term, not an absolute one, so encouraging the development of a high earning community would help to raise the standards of housing. Having said that, housing for essential workers is vital, and the notion of a 'starter home' may be a more positive one than that of a low pay 'ghetto' which has been shown to have detrimental effects on personal development, education, crime and employment.	<p>Comments welcomed and noted.</p> <p>Provision of homes for essential local workers needs to be researched in terms of the overall affordable housing provision for the District and the need it fulfils within the District. This will need to be included in the Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the recently published advice in the NPPG relating to affordable housing provision and any possible changes to the guidance that may influence policy preparation.</p>
Q.H7: What level of Starter Home provision do you think we need in the District?							

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H7	1	Tammy	Williams	Alvechurch Parish Council		10% of the affordable provision seems a sensible starting point, on development sites of 11 dwellings or more. This could probably only be achieved if the LA rigorously enforces the affordable provision as stated in their policies.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	9	Alexandra	Burke	Hagley Parish Council		Leasehold sales have recently fallen into some disrepute, where rents escalated in a manner that eroded the value of the house. Cannot suggest a target.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	20	P	Harrison	Wythall Parish Council		At least 10%.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	34	Sue	Baxter			At least 10%	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H7	35	Peter	King	Campaign to Protect Rural England		These may be desirable objectives. Ensuring that they are fulfilled will be laudable, but it should not be necessary to allocate sites specifically for them.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	36	Conrad	Palmer	Fairfield Village community Association		Starter homes for many families is the first rung of the ladder but due to increasing house prices they are unable to progress up the ladder, the starter home becomes the family home and then the “empty nest” home. During this period children are being raised in a household with two bedrooms and the atmosphere can be claustrophobic. A mixture of affordable dwellings are required, with one, two and three bedrooms. Residents being able to progress to larger and smaller properties as and when required. 80% of properties being built should be “Starter Homes”.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	38	Sue	Green	Home Builders Federation		Housing policies should be underpinned by relevant and up to date evidence which supports and justifies the policies concerned (2018 NPPF para 31). The housing needs for different groups should be assessed to justify the level of starter home provision needed.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	42			Wythall Residents Association		At least 10%	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H7	46	Ian	Mercer	Bruton Knowles	Church of England	This is dependent on local need, and should be assessed as part of the Plan review.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	72	Stephen	Peters			At least 10%.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	78	Sean	Rooney	Harris Lamb	Barratt Homes	10% is considered an appropriate starting point for the amount starter homes. Whilst this can be kept under review, we would have no issues if there was scope for applicants/developers to propose more if they saw fit to do so.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	80	John	Pearce	Harris Lamb	Bloor Homes	We agree that the starting point for the amount of starter homes should be 10%. Whilst this can be kept under review, we again would have no issue if there was scope for applicants/developers to propose more if they saw fit to do so. Clearly, if further Government subsidy was made available to provide starter homes, BHW would be supportive of providing a greater percentage of homes on certain sites.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H7	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	10% is considered an appropriate starting point. Whilst this can be kept under review we would have no issue if there was scope for applicants/developers to propose more if they saw fit to do so.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Agree that the starting point for the amount of starter homes should be 10%. Whilst this can be kept under review, we again would have no issue if there was scope for applicants/developers to propose more if they saw fit to do so.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Agree amount of starter homes should be 10% and should be kept under review, with scope to provide more.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H7	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>The starting point for any assessment of affordable housing provision should be a robust assessment of affordable housing need within the District (contained within a Local Housing Needs Assessment which meets the requirements identified in ID Ref 2a-022-027 of the PPG). Having quantified the total need for affordable housing, consideration should be given to how this is to be met, through the implementation of an affordable housing requirement in the Bromsgrove District Plan. This will take the form of a percentage requirement, which may vary across the authority, depending on viability. Recognising the significant weight that the revised NPPF now places on viability assessments, any such requirement should be thoroughly tested to ensure that it would not undermine the viability (and deliverability) of development.</p> <p>At this time, no such evidence has been published by Bromsgrove District Council. It is therefore not possible to make any judgment on whether a 40% affordable housing requirement can be justified. There is no merit in simply rolling this requirement forward from the adopted Bromsgrove Local Plan on the basis that it is the current policy requirement. Indeed, the fact that this high level of provision has not been achieved<sup>7</sup> suggests that it may have contributed towards deliverability issues and that in the context of the new approach to viability testing at the plan-making stage (rather than planning application stage), it should therefore not be assumed.</p> <p>It is similarly not possible to determine the affordable housing tenure split that should be sought. However, in addressing this issue, careful consideration should be given to the broader definition of affordable housing (as contained in the revised NPPF), which now includes reference to starter homes and other affordable routes to home ownership. The local need for these types of affordable housing product should be considered, together with the impact on development viability. It is not known how the Council has been able to determine that starter homes are “likely to form at least 10% of all dwellings on site as part of our overall affordable housing contribution” (Issues and Options Consultation report paragraph 5.11). Any evidence that underpins this assertion should be made available for review and comment.</p> <p>This will need very careful consideration by Bromsgrove District Council to ensure that the need for all groups can be accommodated, so far as possible, but without undermining the delivery of “general” market housing. It might be that the importance of meeting the needs of certain groups might warrant an upward adjustment to the overall</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	98	Sally	Oldaker			<p>A moderate level – but you need social rented housing as well, so just make sure there are more affordable houses generally and then there will be enough.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	99	Mark	Dauncy	Pegasus	Gallagher Estates	<p>Starter homes should be provided in accordance with the most up to date SHMA as part of overall affordable housing provision.</p>	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H7	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Is this an issue for policy? Extremely detailed point, not helpful at this stage. How do we know how many starter homes are required in a particular location?	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	120	Michael	Davies	Savills	Cala Homes	A blanket level of starter home provision should not be included in the Plan Review and should be assessed on a site by site basis.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	122	Michael	Davies	Savills	Landowners	Planning Practice Guidance states that a starter home is expected to be well designed and suitable for young first time buyers and that LPAs and developers should work together to determine what size and type of starter home is appropriate. We consider that a blanket level of starter home provision should not be included in Bromsgrove District's Local Plan Review and that this should be assessed on a site-by-site basis.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	123	Michael	Burrows	Savills	Landowners	Planning Practice Guidance states that a starter home is expected to be well designed and suitable for young first time buyers and that LPAs and developers should work together to determine what size and type of starter home is appropriate. It is considered that a blanket level of starter home provision should not be included in Bromsgrove District's Local Plan Review and that this should be assessed on a site-by-site basis.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H7	124	Robert	Lofthouse	Savills	Taylor Wimpey	Taylor Wimpey would comply with the current and future NPPF requirements for a mix of types of tenure as part of a well-considered range of housing products.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	134	David	Barnes	Star Planning	Richborough Estates	Starter Homes should also form a minimum of 25% of the affordable housing to be provided on a site. This reflects the aspirations of the Government to promote home ownership.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	161	Ian	Macpherson		Self	Significant level - needs research	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	165	Johanna	Wood			I don't know what the demand is though probably more than current.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>



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H7	180	Nicholas	Rands			Enough to cater for the population of the up coming young generation.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
H7	192			Dodford with Grafton Parish Council		Not an expert; however, affordability is a relative term, not an absolute one, so encouraging the development of a high earning community would help to raise the standards of housing. Having said that, housing for essential workers is vital, and the notion of a 'starter home' may be a more positive one than that of a low pay 'ghetto' which has been shown to have detrimental effects on personal development, education, crime and employment.	<p>Comments welcomed and noted.</p> <p>Affordable housing is an integral part of delivering a balanced supply of homes, of which starter homes is now considered to be a component part.</p> <p>We will need to understand our local housing need and the proportions of different affordable housing products we need within the District. This will for part of a Local Housing Needs Assessment.</p> <p>As part of our emerging evidence base, we will need to demonstrate local housing need. We will also need to be mindful of the advice in the NPPG relating to affordable housing and starter homes and any possible changes to the guidance that may influence policy preparation.</p>
<b>Q.H8: Do you think that sites should be allocated specifically for Starter Home provision in the District? If so, where?</b>							
H8	1	Tammy	Williams	Alvechurch Parish Council		Perhaps if feasible, as developer profit margins tend to dictate this type of development.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>

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H8	2	Gill	Lungley	Barnt Green Parish Council		No. The allocation of starter homes, probably in small clusters, should be dispersed.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	4	Barry	Spence	Bentley Pauncefoot Parish Council		It would seem better to provide a mix of tenure types on all developments above a certain size in order to secure a mix of population.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	20	P	Harrison	Wythall Parish Council		NO.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>

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H8	34	Sue	Baxter			No	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	35	Peter	King	Campaign to Protect Rural England		These may be desirable objectives. Ensuring that they are fulfilled will be laudable, but it should not be necessary to allocate sites specifically for them.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	36	Conrad	Palmer	Fairfield Village community Association		No. Starter homes should be built in mixed communities, enabling sustainable neighbourhoods.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>

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H8	42			Wythall Residents Association		No	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	72	Stephen	Peters			No	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	78	Sean	Rooney	Harris Lamb	Barratt Homes	Sites should only be allocated for starter home provision if they are promoted by the developer for such use, in the same way that the developer may only want 100% affordable housing on their scheme.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>

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H8	80	John	Pearce	Harris Lamb	Bloor Homes	BHW would not be adverse to specific sites being allocated for starter homes, where there was a willing landowner and promoter/developer.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Sites should only be allocated for starter provision if they are promoted by the developer for such a use, in the same way that a developer may only want a 100% affordable housing scheme on their land.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Sites should only be allocated for starter home provision if they are promoted by the landowner for such a use, in the same way that a landowner may only want a 100% affordable housing scheme on their land.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H8	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Should only be allocated for starter homes provision of promoted by the landowner for such a use.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>The starting point for any assessment of affordable housing provision should be a robust assessment of affordable housing need within the District (contained within a Local Housing Needs Assessment which meets the requirements identified in ID Ref 2a-022-027 of the PPG). Having quantified the total need for affordable housing, consideration should be given to how this is to be met, through the implementation of an affordable housing requirement in the Bromsgrove District Plan. This will take the form of a percentage requirement, which may vary across the authority, depending on viability. Recognising the significant weight that the revised NPPF now places on viability assessments, any such requirement should be thoroughly tested to ensure that it would not undermine the viability (and deliverability) of development.</p> <p>At this time, no such evidence has been published by Bromsgrove District Council. It is therefore not possible to make any judgment on whether a 40% affordable housing requirement can be justified. There is no merit in simply rolling this requirement forward from the adopted Bromsgrove Local Plan on the basis that it is the current policy requirement. Indeed, the fact that this high level of provision has not been achieved<sup>7</sup> suggests that it may have contributed towards deliverability issues and that in the context of the new approach to viability testing at the plan-making stage (rather than planning application stage), it should therefore not be assumed.</p> <p>It is similarly not possible to determine the affordable housing tenure split that should be sought. However, in addressing this issue, careful consideration should be given to the broader definition of affordable housing (as contained in the revised NPPF), which now includes reference to starter homes and other affordable routes to home ownership. The local need for these types of affordable housing product should be considered, together with the impact on development viability. It is not known how the Council has been able to determine that starter homes are “likely to form at least 10% of all dwellings on site as part of our overall affordable housing contribution” (Issues and Options Consultation report paragraph 5.11). Any evidence that underpins this assertion should be made available for review and comment.</p> <p>This will need very careful consideration by Bromsgrove District Council to ensure that the need for all groups can be accommodated, so far as possible, but without undermining the delivery of “general” market housing. It might be that the importance of meeting the needs of certain groups might warrant an upward adjustment to the overall</p>	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H8	98	Sally	Oldaker			No – there should be a mixture across all developments.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	120	Michael	Davies	Savills	Cala Homes	Sites should not be allocated specifically for Starter Home provision, legislative provisions are not yet in force.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	122	Michael	Davies	Savills	Landowners	We consider that sites should not allocate specifically for Starter Home provision. Starter Home Provision legislative provisions are not yet in force and so should not be considered in this Local Plan Review.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H8	123	Michael	Burrows	Savills	Landowners	It is considered that sites should not be allocated specifically for Starter Home provision. Starter Home Provision legislative provisions are not yet in force and so should not be considered in this Local Plan Review.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	124	Robert	Lofthouse	Savills	Taylor Wimpey	The allocation of sites for specific purposes should be based on both need and demand.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	134	David	Barnes	Star Planning	Richborough Estates	Starter Home sites could form part of the rural exceptions policy rather than specific allocations.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H8	161	Ian	Macpherson		Self	Yes - particularly in the smaller rural settlements	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	165	Johanna	Wood			This should be seriously considered with a location focus on brownfield sites in the district	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
H8	180	Nicholas	Rands			No, they need to be spread and integrated within other types of property.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H8	192			Dodford with Grafton Parish Council		Not an expert; however, affordability is a relative term, not an absolute one, so encouraging the development of a high earning community would help to raise the standards of housing. Having said that, housing for essential workers is vital, and the notion of a 'starter home' may be a more positive one than that of a low pay 'ghetto' which has been shown to have detrimental effects on personal development, education, crime and employment.	<p>Comments welcomed and noted.</p> <p>We need to understand what proportion of starter homes we need in the District, which will form part of a local housing needs assessment. We also need to understand whether there is a need for specific starter home sites anywhere within the District, or whether mixed tenure sites are more appropriate. Furthermore, we will need a greater understanding as to how starter homes perform in the future in terms of perpetuity.</p> <p>If there is a proven need for starter home specific sites, then this is something we will need to consider as we prepare site allocations for the Preferred Option version of the Plan.</p> <p>As part of the emerging evidence base, we will need to demonstrate local housing need and evaluate all potential future development sites required to meet housing need. We will also need to be mindful of the advice in the NPPG regarding starter homes exception sites and any subsequent Regulations that may influence policy preparation.</p>
<b>Q.H9: Do you think more homes should be built specifically for private rent in the District?</b>							
H9	1	Tammy	Williams	Alvechurch Parish Council		This is something more in keeping with large conurbations e.g. Birmingham City, as usually they are for high rise developments. Build-to-rent maybe accelerating housing supply in conurbations, but it seems likely that these schemes will be subject to less stringent requirements to provide affordable housing, and private rentals are always higher than affordable socially rented dwellings.	Comments noted. We will need have to establish the need of the District through appropriate evidence gathering on the demand for private rent in the district in order to accommodate for the appropriate mix of housing.
H9	4	Barry	Spence	Bentley Pouncefoot Parish Council		No.	Comments noted.
H9	5	Kevin	Joynes	Beoley Parish Council		Homes should be built for private rent within the District.	Comments noted. We will be able to establish the need through appropriate evidence gathering on the demand for private rent in the district in order to accommodate for the appropriate mix of housing.
H9	9	Alexandra	Burke	Hagley Parish Council		Council should seek to encourage landlords to offer longer tenancies.	Comments noted. In partnership with colleagues in housing we will be able to assess the need of the district.
H9	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council feel that there is a shortage of affordable homes in the district, we also have a need for rental properties to cater for those on lower incomes. There is insufficient social housing in the Bromsgrove area. BDHT is well regarded and housing associations have an important role to play in providing quality not for profit rental properties.	Comments noted. We will be able to establish the need through appropriate evidence gathering on the demand for private rent & affordable housing in the district in order to accommodate for the appropriate mix of housing.
H9	20	P	Harrison	Wythall Parish Council		This is entirely a matter for developers.	Comments noted.
H9	34	Sue	Baxter			Yes	Comments noted.
H9	35	Peter	King	Campaign to Protect Rural England		It is often stated that there is a shortage of affordable homes, but we believe the need is more for houses for rent (rather than purchase), to meet the needs of those on lower incomes, who cannot afford to buy. Private rented housing meets the needs of this economic group. Housing for the severely disadvantaged, such as those with severe physical disabilities or learning difficulties, who will never be able fully to earn their living, will always need to be subsidised by the state. However, the state's resources depend on taxation. It should be possible for the council to work with private-sector funders, such as pension funds and life assurance companies to obtain long-term private-sector funding for build-to-rent housing.	Comments noted. We will be able to establish the need through appropriate evidence gathering on the demand for private rent in the district in order to accommodate for the appropriate mix of housing. We will work closeley with colleagues and stakeholders to ensure that all residents in the district are supported by the right housing mix.
H9	36	Conrad	Palmer	Fairfield Village community Association		NO.	Comments noted.
H9	42			Wythall Residents Association		This is entirely a matter for developers.	Comments noted.
H9	72	Stephen	Peters			This is entirely a matter for developers.	Comments noted.
H9	78	Sean	Rooney	Harris Lamb	Barratt Homes	We agree that homes for private rent would contribute to a range and type of housing on offer in the district and would contribute to meeting a wider range of housing need from different sections of the community.	Comments noted.
H9	80	John	Pearce	Harris Lamb	Bloor Homes	BHW would be supportive of any measures that sought to provide more homes in the District. Whilst BHW would not themselves build and rent out homes, if there was a demand for additional private rented homes, BHW could potentially sell their homes to landowners/providers who are looking to service this sector of the market. As such, BHW would be supportive on principle.	Comments noted.
H9	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Agree that homes for private rent would contribute to the range and type of housing on offer in the District to meet a range of housing needs from different sections of the community. Would not object to more homes for private rent being built.	Comments noted.

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H9	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Agree that homes for private rent would contribute to the range and type of housing on offer in the District and would contribute to meeting a wider range of housing needs from different sections of the community. As such, we would not object to more homes for private rent being built.	Comments noted.
H9	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Agree. Homes for private rent would contribute to a range and type of housing on offer .	Comments noted..
H9	87			Indenture		The market has reacted well to private rent and may continue to respond despite the Government now insisting on the provision of 20% affordable housing.	Comments noted.
H9	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>The starting point for any assessment of affordable housing provision should be a robust assessment of affordable housing need within the District (contained within a Local Housing Needs Assessment which meets the requirements identified in ID Ref 2a-022-027 of the PPG). Having quantified the total need for affordable housing, consideration should be given to how this is to be met, through the implementation of an affordable housing requirement in the Bromsgrove District Plan. This will take the form of a percentage requirement, which may vary across the authority, depending on viability. Recognising the significant weight that the revised NPPF now places on viability assessments, any such requirement should be thoroughly tested to ensure that it would not undermine the viability (and deliverability) of development. At this time, no such evidence has been published by Bromsgrove District Council. It is therefore not possible to make any judgment on whether a 40% affordable housing requirement can be justified.</p> <p>It is similarly not possible to determine the affordable housing tenure split that should be sought. However, in addressing this issue, careful consideration should be given to the broader definition of affordable housing (as contained in the revised NPPF), which now includes reference to starter homes and other affordable routes to home ownership. The local need for these types of affordable housing product should be considered, together with the impact on development viability. It is not known how the Council has been able to determine that starter homes are “likely to form at least 10% of all dwellings on site as part of our overall affordable housing contribution” (Issues and Options Consultation report paragraph 5.11). Any evidence that underpins this assertion should be made available for review and comment.</p> <p>This will need very careful consideration by Bromsgrove District Council to ensure that the need for all groups can be accommodated, so far as possible, but without undermining the delivery of “general” market housing. It might be that the importance of meeting the needs of certain groups might warrant an upward adjustment to the overall housing need, above the figure identified by the standard method. However, in the absence of any robust evidence regarding the need for affordable housing or other special needs, it is not currently possible to determine such needs.</p>	Comments noted. The right housing mix will be supported by a robust evidence base which will be available in due course.
H9	94			Nigel Gough Associates	Aniston Ltd	The market has reacted well to private rent and may continue to respond despite the Government now insisting on the provision of 20% affordable housing.	Comments noted.
H9	95			Nigel Gough Associates	Monksgraston Ltd	The market has reacted well to Private Rent and may continue to respond despite the Government now insisting on the provision of 20% Affordable Housing . This Government change throws into question the whole rationale for Affordable Housing as previously set out.	Comments noted.
H9	96			Nigel Gough Associates	Mr Stapleton	The market has responded well to private rent and may continue to respond despite the Government insisting on the provision of 20% affordable housing. This government change throws into question the rationale for affordable housing previously set out.	Comments noted.
H9	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	The market has reacted well to private rent and may continue to respond despite the Government now insisting on the provision of 20% affordable housing. This Government change throws into question the whole rationale for affordable housing as previously set out.	Comments noted.
H9	98	Sally	Oldaker			No – it’s better to have council housing instead, as private rental can lead to unscrupulous and unregulated landlords. Not sure why you claim there would be higher living standards!	Comments noted.
H9	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Is this an issue for policy? Extremely detailed point, not helpful at this stage. How do we know private rented accommodation is required now or in the future at any particular location?	Comments noted.
H9	124	Robert	Lofthouse	Savills	Taylor Wimpey	An appropriate mix of homes and tenures should be considered on all sites. The inclusion of PRS would be appropriate if there is a need and market demand.	Comments noted. The right housing mix is important for residents of the district and will be supported by a robust evidence base.
H9	134	David	Barnes	Star Planning	Richborough Estates	Whether homes should be developed for private rent is a matter for the housing market. There are increasing concerns from some landlords that because of, quite rightly, controls on ‘rouge landlords’ and tax changes being implemented by the Government are acting as a disincentive for private renting provision.	Comments noted.
H9	161	Ian	Macpherson		Self	Up to the housing market to decide which houses to rent.	Comments noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H9	165	Johanna	Wood			This is a question of what the objectives are. If this is key then yes but not for private landlords unless rent rates are capped so as to remain accessible/affordable for those who need these properties most.	Comments noted. In partnership with colleagues in housing we will be able to assess the need of the district which will be supported by evidence.
H9	166	John	Gerner			No	Comments noted.
H9	192			Dodford with Grafton Parish Council		Not an expert; however, affordability is a relative term, not an absolute one, so encouraging the development of a high earning community would help to raise the standards of housing. Having said that, housing for essential workers is vital, and the notion of a 'starter home' may be a more positive one than that of a low pay 'ghetto' which has been shown to have detrimental effects on personal development, education, crime and employment.	Comments noted. The right housing mix is important for residents of the district and will be supported by a robust evidence base.
<b>Q.H10: Are you aware of any of Bromsgrove District's rural settlements that have a specific shortage of affordable homes for local, newly forming households? If so, where?</b>							
H10	1	Tammy	Williams	Alvechurch Parish Council		It's thought that all rural settlements may qualify for this to some degree but it would need very local housing surveys to prove what sort of shortage there is for each settlement.	Comments noted and this will be supported by evidence from the housing needs survey.
H10	4	Barry	Spence	Bentley Pouncefoot Parish Council		We are aware of local residents in rural areas such as ours who live either in poor quality shared accommodation or in sub-standard housing. We would strongly support the allocation of Rural Exception Sites in some of Bromsgrove's rural settlements.	Comments noted and welcomed. An up-to-date housing needs survey will be provided as part of the evidence base.
H10	5	Kevin	Joynes	Beoley Parish Council		Not aware that Beoley Parish has any particular shortage of affordable housing.	Comments noted.
H10	9	Alexandra	Burke	Hagley Parish Council		No. Housing Needs surveys have commonly revealed that the need is very considerably smaller than was supposed from the gross numbers of housing applicants on the housing waiting list. With the occasional exception where a person needs to live on site because they are engaged in agriculture, it is doubtful if there is any rural need that cannot be accommodated in nearby villages.	Comments noted.
H10	20	P	Harrison	Wythall Parish Council		I believe this is a District-wide problem.	Comments noted.
H10	28	Emily	Barker	Worcestershire County Council		Affordable and social rent properties are more likely to be offered to families already living in an area. However, starter homes and other forms of affordable properties are more likely to be offered to families outside the immediate area, creating a greater impact on school places than affordable or social rent properties.	Comments noted.
H10	34	Sue	Baxter			No, but these would be identified through the neighbourhood planning process.	Comments noted. A housing needs assessment will form part of the evidence base and establish what the need is for the district.
H10	35	Peter	King	Campaign to Protect Rural England		Such needs probably exist, but we do not know of any specific cases.	Comments noted. A housing needs assessment will form part of the evidence base and establish what the need is for the district.
H10	36	Conrad	Palmer	Fairfield Village community Association		Fairfield urgently requires managed, sustainable, affordable development, to encourage young families to move to the village and for older people, who have lived in the village all or nearly all their lives, to downsize to. Less than 10 children at the local First School live in the village, the shop has closed due to low trading, the bus service is often under review and there is concern about the future of the Post Office. The vibrancy of the community is down to a small pool of volunteers who are getting older. A managed development scheme that does not destroy the community spirit and retains the natural environment may enable a larger pool of people to fish for volunteers from, who can help deliver social activities within the village that reduces social isolation and helps build pride in the community. An increased population may sustain the bus service and Post Office, increase the number of children attending the First School, thereby reducing the number of children attending the school who are driven in from elsewhere, and it may even lead to the reopening of a shop.	Comments noted. A housing needs assessment will form part of the evidence base and establish what the need is for the district.
H10	42			Wythall Residents Association		We believe this is a District-wide problem.	Comments noted.
H10	66	Susan	Wilkes			Fairfield has a thriving first school which is due to expand. Most children travel to the school from outside the catchment area.  There are no affordable homes in the village and the last 3 bedroom semi detached houses to be built, numbered four in total and were built in the 1960's. Local affordable homes in the village would go some way to alleviating the traffic and parking difficulties experienced at peak times and would also encourage walking and cycling by reducing traffic through the village because a higher proportion of children will be coming from within the village rather than travelling in by car. The addition of affordable homes would increase the vibrancy of the village which is predominantly older adults currently. Encouraging young families into the village will increase the chance of retaining current services. We have lost a shop and almost lost the bus service recently due to under - use. Increasing the population of the village in a limited way will increase its sustainability into the future.	Comments noted. A housing needs assessment will form part of the evidence base and establish what the need is for the district.
H10	72	Stephen	Peters			I believe this is a District-wide problem.	Comments noted.
H10	87			Indenture		Why has the authority not released information that it has on those rural settlements that are known to have specific shortages of affordable homes. Perhaps this information could be made available before the next stage by consultation with the representative organisations.	Comments noted.
H10	99	Mark	Dauncy	Pegasus	Gallagher Estates	Need should be identified through the LPR and in particular Local Housing Needs Surveys.	Comments noted. A housing needs assessment will form part of the evidence base and establish what the need is for the district.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H10	161	Ian	Macpherson		Self	Yes - high value areas such as Hagley	Comments noted.
H10	180	Nicholas	Rands			In general I would say that ALL rural settlements have a specific shortage of affordable homes for local, newly forming households. I have a personal knowledge of a lack within Upper Bentley, Lower Bentley and Woodgate.	Comments noted.
H10	192			Dodford with Grafton Parish Council		Not an expert; however, affordability is a relative term, not an absolute one, so encouraging the development of a high earning community would help to raise the standards of housing. Having said that, housing for essential workers is vital, and the notion of a 'starter home' may be a more positive one than that of a low pay 'ghetto' which has been shown to have detrimental effects on personal development, education, crime and employment.	Comments noted and an updated housing needs assessment will form part of the evidence base.
<b>Q.H11: Which of the following options do you consider is most appropriate and why? [For options see Sep 2018 consultation document, p.31]</b>							
H11	1	Tammy	Williams	Alvechurch Parish Council		A combination of option 1 and 2 would offer the best solution, with a wider range of homes added to address the under-supply of affordable housing .	Comments noted for Option 1 &2.
H11	2	Gill	Lungley	Barnt Green Parish Council		Option 2 – specifically more small dwellings with fewer bedrooms close to Bromsgrove Railway Station and sites closer to Bromsgrove town centre.	Comments noted for Option 2
H11	4	Barry	Spence	Bentley Pauncefoot Parish Council		We would support option 2. We believe that, left to the developers, the mix of housing sizes and types would not truly reflect the District's needs.	Comments noted for option 2
H11	9	Alexandra	Burke	Hagley Parish Council		Continuing need for small family homes. Needs of the town of Bromsgrove may well differ from the large villages, which are more dependent upon commuting - separate policies are needed. Considerable anecdotal evidence of a shortage of suitable properties for such people to downsize to. Existing stock of bungalows needs to be protected. Sheltered housing differs relatively little from other blocks of flats and might conveniently be treated as C3. Does not work for those who need affordable housing, as the benefits system doesn't manage to fund the service charge. May mean there needs to be a separate subcategory for social sheltered housing. Care homes definitely fall within class C2. Suspect there may be a strong case for an integrated large retirement village, perhaps 1000 units. Would be an attractive use for part of the Perryfields and Whitford sites or for the land between Norton Farm and Barnsley Hall.	Comments noted.
H11	20	P	Harrison	Wythall Parish Council		Option 2 – specifying size and type of homes is necessary to prevent the building of expensive, larger homes whilst neglecting the needs of younger families.	Comments noted for Option 2.
H11	28	Emily	Barker	Worcestershire County Council		Preference is for Homes for Life - provide greater flexibility in accommodation.	Comments noted for Option 2.
H11	34	Sue	Baxter			Option 2 – Necessary to develop diverse and balance communities, rather than exclusive commuter residences	Comments noted for Option 2.
H11	35	Peter	King	Campaign to Protect Rural England		The market has historically provided largely 3-4 bedroom houses and has been conservative in its approach to variety in housing provision. While the market has an important role to play, the policies in the plan should seek to increase the provision of houses for those groups who need housing. This may vary across the district but particular emphasis should be placed on the elderly, the infirm and first time entrants to the market.	Comments noted that Option 2 is preferred.
H11	36	Conrad	Palmer	Fairfield Village community Association		Option 2.	Comments noted for Option 2.
H11	38	Sue	Green	Home Builders Federation		The housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (2018 NPPF paras 61 & 62). The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. As set out in Option 1 market signals are important in determining the size and type of homes needed. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as families, older people and / or self-build rather than setting a specific housing mix on individual sites. Therefore Option 2 is considered inappropriate. The LPR should ensure that suitable sites are available for a wide range of types of developments across a wide choice of appropriate locations.	Comments noted that Option 2 is preferred.
H11	42			Wythall Residents Association		Option 2 – specifying size and type of homes is necessary to prevent the building of expensive, larger homes whilst neglecting the needs of younger families.	Comments noted that Option 2 is preferred.
H11	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Option 1 is considered the most appropriate approach, this would ensure that development proposals are able to respond quickly to market changes. Provision of a housing mix that accords with market signals is therefore considered to improve completion rates and the timely delivery of development.	Comments noted that Option 1 is preferred.
H11	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	Option 1 is the most appropriate given it uses market signals and can react to changes in the market. Option 2 would not be supported given it may stifle development and create viability issues.	Comments noted that Option 1 is preferred.
H11	46	Ian	Mercer	Bruton Knowles	Church of England	We consider it is most appropriate to determine the size and type of homes by being guided by market signals.	Comments noted that Option 1 is preferred.
H11	47	Michael	Jones	Caddick Land		Housing mix needs to be guided by market analysis to ensure that homes that are provided best meet the market demand. Larger scale development above 25 units should incorporate a mix of housing types providing the mix is reflective of the character of the area and that viability is not undermined.	Comments noted that Option 1 is preferred.

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H11	48	Grace	Allen	CBRE	Arden Park Properties	It is important that there is some guidance in terms of the housing type and tenure required for the District in order for applicants to contribute towards the needs. In this regard, any proposed housing mix for the District should be informed by an up to date SHMA. However, measures should be included within the policy to enable flexibility to accommodate for local need and individual areas throughout the plan period, and to also respond to market signals. The needs of the District will likely change over the course of the next two decades and housing mix being guided by market signals such as pricing history, absorption rates and new builds (as outlined in Option 1) the Council will be able to implement a flexible approach to indicative size and type guidance for different parts of the District (as outlined in Option 2). This will also be important in ensuring the delivery of housing over the Plan period.	Comments noted that both options are supported.
H11	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	Option 1 where the development is guided by market signals to determine the size and type of homes the District needs is the most appropriate option. This will allow the most appropriate size and type of homes to be provided by the developers who will be the most aware of those types selling and therefore in demand.	Comments noted that Option 1 is preferred.
H11	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	Claremont Planning, on behalf of Spitfire Home's, are of the view that any housing mix policy that forms part of the new Local Plan should avoid being overly prescriptive and allow for appropriate means of flexibility. This is key to ensure that any housing mix policy does not act as a barrier to development and ensures it forms part of an enabling force for development through the Local Plan. Whilst it is understood that some extent of required mix will need to form part of the development management policies of the Plan, as to ensure that the identified need can be met, this should not be enforced in a cross-cutting, blanket fashion across the entire District. Housing mix requirements should take into account the context of their location in terms of the requirements as demanded by local communities, settlements and other influences that may arise from beyond the District. It is important that this flexible approach is considered by the emerging Plan to ensure that the policies within it can be effectively implemented to meet identified need of the District. As such, Option 1 would be the most likely suitable Option to incorporate into the next phase of the Local Plan – this will ensure that local market signals can be appropriately used in the evaluation of any proposal, rather than referral to a prescriptive requirement that will likely become rapidly out of date over the period of the Plan. This will also contribute towards the provision of a greater diversity of housing delivered amongst the District's more rural settlements, which will both contribute towards the maintenance of essential services within such settlements, but also cater for specific needs of these smaller villages and settlements in the District's countryside.	Comments noted that Option 1 is supported.
H11	52	Tom	Ryan	Claremont Planning	Bellway Homes	Option 1 would be the most likely suitable Option to incorporate into the next phase of the Local Plan – this will ensure that local market signals can be appropriately used in the evaluation of any proposal, rather than referral to a prescriptive requirement that will likely become rapidly out of date over the period of the Plan. This will also contribute towards the provision of a greater diversity of housing delivered amongst the District's more rural settlements, which will both contribute towards the maintenance of essential services within such settlements, but also cater for specific needs of these smaller villages and settlements in the District's countryside.	Comments noted that Option 1 is preferred.
H11	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	Option 1 would be the most likely suitable Option to incorporate into the next phase of the Local Plan – this will ensure that local market signals can be appropriately used in the evaluation of any proposal, rather than referral to a prescriptive requirement that will likely become rapidly out of date over the period of the Plan.	Comments noted that Option 1 is preferred.
H11	54	Katherine	Else	Claremont Planning	Miller Homes	Housing mix policy that forms part of the new Local Plan should avoid being overly prescriptive and allow for appropriate means of flexibility. Option 1 would be the most likely suitable Option to incorporate into the next phase of the Local Plan – this will ensure that local market signals can be appropriately used in the evaluation of any proposal, rather than referral to a prescriptive requirement that will likely become rapidly out of date as the Plan progresses forwards over time.	Comments noted that Option 1 is preferred.
H11	68	Nicole	Penfold	Gladmans		Policy should have a degree of flexibility to respond to changing circumstances over the plan period as well as differing needs across the District. Council needs to ensure allocating sites to meet the needs of specifically identified groups.	Comments noted that Option 1 is preferred and that there needs to be some flexibility within policies.
H11	69	Latisha	Dhir	GVA	St Phillips	Important to maintain flexibility to allow for changing local market circumstances. Also important that the housing mix prescriptions are revised in line with up-to-date evidence and it is important that this is reflected within the policy wording. Option 1 is the preferred option.	Comments noted that Option 1 is preferred and that there needs to be some flexibility within policies.
H11	72	Stephen	Peters			Option 2 – specifying size and type of homes is necessary to prevent the building of expensive, larger homes whilst neglecting the needs of younger families.	Comments noted that Option 2 is preferred.
H11	75	Rachel	Mythen	GVA	Taylor Wimpey	Support Option 1 - It will be important to maintain flexibility to allow for changing local market circumstances. It will also be important that the housing mix prescriptions are revised in line with up-to date evidence (SHMA) and it is important that this is reflected within the policy wording.	Comments noted that Option 1 is preferred and that there needs to be some flexibility within policies.
H11	76	Emily	Vyse	GVA	University of Birmingham	Option 1 is considered to be most appropriate for setting housing mix. This is to “be guided by market signals to determine the size and type of homes the District needs”. However, if this is not acceptable to the Council, housing mix parameters should be set having regard to local need (i.e. overall District requirements will not necessarily be relevant / appropriate in all parts of the District).	Comments noted that Option 1 is preferred.

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H11	78	Sean	Rooney	Harris Lamb	Barratt Homes	Option 1 seems to appear the most appropriate, as this will allow any developers to respond to any changes in the market over time, without having to amend any policies in the plan.	Comments noted that Option 1 is preferred.
H11	80	John	Pearce	Harris Lamb	Bloor Homes	As a housebuilder, BHW's preference is Option 1, as they are well placed to respond to change in the market. Accordingly, feedback from the market provides a clear indication of what is demanded and when, and more importantly, when there are changes in the demand.	Comments noted that Option 1 is preferred.
H11	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Option 1 appears to be most appropriate as will allow developers to respond to any changes in the market over time without having to amend policies in the plan. Market is better placed to respond quicker than a local plan review and deliver housing that is needed in an area.	Comments noted that Option 1 is preferred.
H11	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Option 1 - this will allow developers to respond to any changes in the market over time, without having to amend policies in the Plan. The market is able to respond to changes more quickly than it takes to review a Local Plan so is better placed to deliver the housing that is demanded and needed in an area.	Comments noted that Option 1 is preferred.
H11	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Preference for Option 1, Would allow for developers to respond to any changes in the market over time, without having to amend policies. The market is better placed to deliver the housing that is demanded and needed in an area.	Comments noted that Option 1 is preferred.
H11	87			Indenture		Option 1 is the most appropriate.	Comments noted that Option 1 is preferred.
H11	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	Taylor Wimpey recommends Option 1 to be the most appropriate way of determining Bromsgrove's housing mix. However, the inclusion of the word 'signals' is not appropriate and should be removed.	Comments noted that Option 1 is preferred.
H11	94			Nigel Gough Associates	Aniston Ltd	Consider Option 1 to be the most appropriate.	Comments noted that Option 1 is preferred.
H11	95			Nigel Gough Associates	Monksgraston Ltd	We consider Option 1 to be the most appropriate.	Comments noted that Option 1 is preferred.
H11	96			Nigel Gough Associates	Mr Stapleton	Consider Option 1 to be most appropriate.	Comments noted that Option 1 is preferred.
H11	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	We consider option 1 to be most appropriate.	Comments noted that Option 1 is preferred.
H11	98	Sally	Oldaker			I think Option 1: Be guided by market signals to determine the size and type of homes the District needs – well, because that makes sense!	Comments noted that Option 1 is preferred.
H11	99	Mark	Dauncy	Pegasus	Gallagher Estates	Option 1 is the most appropriate to be guided by market signals, should not be specified in policy which represents only a snapshot in time. Policy should direct the reader to the latest evidence base. To ensure that housing mix is reflective of market driven need.	Comments noted that Option 1 is preferred.
H11	100	Ryan	Bishop			I would choose option 1 – we need to follow the market based on what is in demand and where otherwise we won't have a constant demand for property after initial purchase.	Comments noted that Option 1 is preferred.
H11	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Option 1: requirements will change over time, and the opportunity to change over time is especially necessary if a long term approach is taken, as recommended by our representations.	Comments noted that Option 1 is preferred.
H11	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Option 1 - Housing Mix policies should be suitably flexible to account for the vagaries of the housing market throughout the District and should only apply to more strategic sites. On small sites of 20/30 homes, a mix policy can be significantly constraining and can in some cases completely undermine viability. If the landowner is not sufficiently incentivised to sell, sites will not deliver or could be delayed.  For example, in areas where there is a high demand for 4 and 5 bed houses, but a local undersupply within the second-hand stock, it would be somewhat misguided to rigidly stick to a housing mix policy, as this will simply result in disproportionate house price growth as a result of scarcity.	Comments noted that Option 1 is preferred.
H11	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of H11, Housing Mix policies should be suitably flexible to account for the vagaries of the housing market throughout the District and should only apply to more strategic sites. On small sites of 20/30 homes, a mix policy can be significantly constraining and can in some cases completely undermine viability. If the landowner is not sufficiently incentivised to sell, sites will not deliver or could be delayed.  For example, in areas where there is a high demand for 4 and 5 bed houses, but a local undersupply within the second-hand stock, it would be somewhat misguided to rigidly stick to a housing mix policy, as this will simply result in disproportionate house price growth as a result of scarcity. Market signals (Option 1) is therefore preferable.	Comments noted that Option 1 is preferred.
H11	112	Gareth	Sibley	RCA Regeneration	Piper Group	Housing Mix properties should only apply to more strategic sites. On small sites of 20/30 homes, a mix policy can be constraining and can completely undermine viability. If the landowner isn't incentivised to sell, sites will not deliver. Market signals (Option 1) is therefore preferable.	Comments noted that Option 1 is preferred.

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H11	113	Gareth	Sibley	RCA Regeneration	CAD Square	In respect of H11, Housing Mix policies should be suitably flexible to account for the vagaries of the housing market throughout the District and should only apply to more strategic sites. On small sites of 20/30 homes, a mix policy can be significantly constraining and can in some cases completely undermine viability. If the landowner is not sufficiently incentivised to sell, sites will not deliver or could be delayed.  For example, in areas where there is a high demand for 4 and 5 bed houses, but a local undersupply within the second-hand stock, it would be somewhat misguided to rigidly stick to a housing mix policy, as this will simply result in disproportionate house price growth as a result of scarcity. Market signals (Option 1) is therefore preferable.	Comments noted that Option 1 is preferred.
H11	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	Setting specific standards for housing types and size would be overly prescriptive and potentially unresponsive to market demands. Place greater support on allowing the market to respond to changing household demand within a framework of promoting access to suitable housing for all.	Comments noted that Option 1 is preferred.
H11	119	Darren	Oakley	RPS Group	Gleeson	RPS are of the view that setting specific standards for housing types and size would be overly-prescriptive and potentially un-responsive to market demands at a given point in time. The policy would then be at risk of becoming quickly out of date and therefore ineffective. Consequently, RPS would therefore place greater support on allowing the market respond to changing household demand within a framework of promoting access to suitable housing for all (more akin to Option1).	Comments noted that Option 1 is preferred.
H11	120	Michael	Davies	Savills	Cala Homes	Option 1 is the most appropriate. As national housebuilders have vested interests in building products that are deliverable and meet market needs, Bromsgrove should not have a fixed size and type guidance, as this could affect development viability.	Comments noted that Option 1 is preferred.
H11	122	Michael	Davies	Savills	Landowners	We consider that 'Option 1: Be guided by market signals to determine the size and type of homes the District needs' is the most appropriate for Bromsgrove District. As such, Bromsgrove should take account of these 'market signals' as required by the NPPF. Housebuilders have an interest in building products that are deliverable and meet market needs. To enable this development viability, Bromsgrove should not have a fixed size and type guidance.	Comments noted that Option 1 is preferred.
H11	123	Michael	Burrows	Savills	Landowners	Option 1 - Housebuilders have a vested interest in building dwellings that are deliverable, viable and meet market needs for the particular area or wider District in which the development site is located. To ensure sufficient flexibility, BDC should therefore not be seeking to fix the size and types of dwellings for different parts of the District.	Comments noted that Option 1 is preferred.
H11	124	Robert	Lofthouse	Savills	Taylor Wimpey	Option 1 and Option2.	Comments noted that Option 1 & 2 are supported.
H11	125	Alastair	Thornton	Simply Planning	Woodpecker Plc	In terms of housing density a mix of Option 3 (ensuring compliance with surroundings) and Option 4 (influencing site density through good design) is, in our view, most appropriate. Clearly, increasing density is a key way of delivering more homes where land supply is constrained. Developments should, however, maximise housing output on an individual and site-specific basis. Density targets should not be applied prescriptively. Denser developments should be directed to sustainable locations. The key for high density schemes to be successful places to live is reliant on the quality of design. This can only be tested on a site-specific basis. Aligned to this, housing mix should also be guided by market signals and considered, in particular, on a site-specific basis (Q.H.11).	Comments noted that Option 1 is supported.
H11	134	David	Barnes	Star Planning	Richborough Estates	Housing mix is a combination of the Strategic Housing Market Assessment and the market demand in a location. After all the new homes need occupiers who want to live in a location (e.g. 1-bedroom flats in a rural village would not be as attractive to young singletons when compared to similar accommodation in Bromsgrove town centre). Any policy concerning housing mix needs to have enough flexibility to enable market signals to be taken into account, secure the optimal density of development and the delivery of a high quality scheme.	Comments noted that Option 1 is preferred.
H11	136	Kathryn	Young	Turley	Land Fund	Our client supports Option 1. Option 1 maximises opportunities for developments to respond to the individual needs of that part of the District over the lifetime of the Plan Period. In order that policies do not act as a constraint to development by affecting development viability it is important that policies are applied flexibly and that the local planning authority work with the development industry (i.e. house builders and strategic land promoters) to determine the specific development needs of a given area i.e. on a settlement by settlement scale rather than sectioning off different parts of the District.	Comments noted that Option 1 is supported.
H11	137	Matthew	Fox	Turley	Redrow Homes	Option 1 and Option 2  The mix of housing should be informed by clear evidence such as the local housing needs assessment. Redrow support Option 1 as this will maximise opportunities for each development site having regard to specific locational character/constraints. A 'blanket' approach for broad areas of the District is therefore inappropriate. Medium and large scale sites are able to deliver a wider mix of house types.	Comments noted that both options are supported.
H11	161	Ian	Macpherson		Self	Option 2	Comments noted that Option 2 is preferred.
H11	165	Johanna	Wood			Option 2 - provides a more structured approach with clear objectives as part of the plan.	Comments noted that Option 2 is preferred.



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H11	180	Nicholas	Rands			I prefer Option 1: Be guided by market signals to determine the size and type of homes the District needs, otherwise you will be dictating the type of properties and people that will be living in a certain area.	Comments noted that Option 1 is preferred.
H11	190	Philip	Ingram			Option 1 - market signals are important in determining the size and type of homes. Different sites are more suited to certain types of dwellings that others and sites shouldn't be required to meet a standard mix set by the District.	Comments noted that Option 1 is preferred.
H11	192			Dodford with Grafton Parish Council		Option 1 would be the preferred option, with a strong marketing element to the Districts public policy to try and influence the development of communities that are wider, more diverse, and wealthier.	Comments noted that Option 1 is preferred.
H11	194	Darren	Oakley	RPS	Clients	RPS are of the view that setting specific standards for housing types and size would be overly-prescriptive and potentially un-responsive to market demands at a given point in time. The policy would then be at risk of becoming quickly out of date and therefore ineffective. Consequently, RPS would therefore place greater support on allowing the market respond to changing household demand within a framework of promoting access to suitable housing for all (more akin to Option1).	Comments noted for Option 1 preferred.
<b>Q.H12: Do you have any other comments on the above options?</b>							
H12	11	Rosamund	Worrall	Historic England		Housing mix may be influenced by the historic environment in terms of density, size and type of housing and potential residential development sites and the SA should consider this as the Plan progresses.	Comments noted. We acknowledge that a range of housing types can be influenced by the Historic Environment and this will be considered through the policy making process.
H12	35	Peter	King	Campaign to Protect Rural England		The market has historically provided largely 3-4 bedroom houses and has been conservative in its approach to variety in housing provision. While the market has an important role to play, the policies in the plan should seek to increase the provision of houses for those groups who need housing. This may vary across the district but particular emphasis should be placed on the elderly, the infirm and first time entrants to the market.	Comments noted.
H12	36	Conrad	Palmer	Fairfield Village community Association		Respond to local needs to create a vibrant and sustainable community.	Comments noted.
H12	52	Tom	Ryan	Claremont Planning	Bellway Homes	Claremont Planning, on behalf of Bellway Homes, are of the view that any housing mix policy that forms part of the new Local Plan should avoid being overly prescriptive and allow for appropriate means of flexibility. This is key to ensure that any housing mix policy does not act as a barrier to development and ensures it forms part of an enabling force for development through the Local Plan. Whilst it is understood that some extent of required mix will need to form part of the development management policies of the Plan, as to ensure that the identified need can be met, this should not be enforced in a cross-cutting, blanket fashion across the entire District.	Comments noted. The Housing mix policy will be supported by evidence and will allow for an element of flexibility and will be supported by the High Quality Design SPD.
H12	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	any housing mix policy that forms part of the new Local Plan should avoid being overly prescriptive and allow for appropriate means of flexibility. This is key to ensure that any housing mix policy does not act as a barrier to development and ensures it forms part of an enabling force for development through the Local Plan. Whilst it is understood that some extent of required mix will need to form part of the development management policies of the Plan, as to ensure that the identified need can be met, this should not be enforced in a cross-cutting, blanket fashion across the entire District. Housing mix requirements should take into account the context of their location in terms of the requirements as demanded by local communities, settlements and other influences that may arise from beyond the District. It is important that this flexible approach is considered by the emerging Plan to ensure that the policies within it can be effectively implemented to meet identified need of the District.	Comments noted. The Housing mix policy will be supported by evidence and will allow for an element of flexibility and will be supported by the High Quality Design SPD.
H12	54	Katherine	Else	Claremont Planning	Miller Homes	Housing mix policy that forms part of the new Local Plan should avoid being overly prescriptive and allow for appropriate means of flexibility. Option 1 would be the most likely suitable Option to incorporate into the next phase of the Local Plan – this will ensure that local market signals can be appropriately used in the evaluation of any proposal, rather than referral to a prescriptive requirement that will likely become rapidly out of date as the Plan progresses forwards over time.	Comments noted. The Housing mix policy will be supported by evidence and will allow for an element of flexibility and will be supported by the High Quality Design SPD.
H12	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	ensure that the mix of housing reflects the local needs of the District and any cross-border needs to be accommodated.	Comments noted. We will ensure that the mix of housing considered the local need and any cross-border needs where appropriate.
H12	78	Sean	Rooney	Harris Lamb	Barratt Homes	Having the flexibility to respond to market demand is a key consideration for housebuilders. There is a substantial risk for housebuilders having to rigidly adhere to size and type restrictions, as they are likely to achieve slower sales rates and be left with standing stock.	The Housing mix policy will be supported by evidence and will allow for an element of flexibility and will be supported by the High Quality Design SPD.
H12	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Having flexibility to respond to market demand is a key consideration for housebuilders. Substantial risk of having to adhere rigidly to size and type restrictions as they are likely to achieve slower sales rates and be left with standing stock.	The Housing mix policy will be supported by evidence and will allow for an element of flexibility and will be supported by the High Quality Design SPD.
H12	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Demand changes over time and therefore, having flexibility to respond to what is being demanded in the market is a key consideration for housebuilders, rather than having to rigidly adhere to size and type restrictions, where there is a risk that, in doing so, they will achieve slower sales rates and be left with standing stock.	The Housing mix policy will be supported by evidence and will allow for an element of flexibility and will be supported by the High Quality Design SPD.
H12	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Having flexibility to respond to what is being demanded in the market is a key consideration for housebuilders, rather than rigidly adhering to size and type restrictions when they will achieve slower sales rates and be left with standing stock.	Comments noted. We will establish the type and demand of housing in the District through supporting evidence and the housing needs assessment.

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H12	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	<p>Taylor Wimpey suggest the Local Plan should not be prescriptive when it comes to housing mix, as strict guidance may not adequately reflect likely market demand, resulting in it being overly Restrictive in terms of market choice. This may ultimately undermine Bromsgrove's housing delivery. For example, paragraph 5.15 of the Bromsgrove Issues and Options consultation document only discusses the existing housing mix, there is no assessment of future housing needs, which should be taken into consideration as housing needs are likely to fluctuate over time. It is also clear that the type of dwelling mix that would best reflect market demand is likely to vary by location. For example, a town centre site might be better suited to smaller properties, whilst an urban extension may include a broader range of dwellings, including a large proportion of family homes.</p> <p>Within the context of a need to increase the rate of house building, it is of critical importance to ensure that an appropriate mix of housing is provided to meet demands across Bromsgrove.</p>	The Housing mix policy will be supported by evidence and will allow for an element of flexibility and will be supported by the High Quality Design SPD.
H12	124	Robert	Lofthouse	Savills	Taylor Wimpey	We support Option 1, being guided by market signals. Taylor Wimpey are well positioned to understand the local market and will be responsive to delivering market homes which reflect local needs. Flexibility also needs to be provided for the delivery of affordable homes, as part of a broader tenure mix secured through S106 planning obligations, to respond to changing local housing need. This is particularly important in the context of the delivery of a site of the scale of the Perryfields development which will be delivered, in phases, over a longer timeframe.	Support noted for Option 1.
H12	161	Ian	Macpherson		Self	Option 2 would take into account the projected demand on an area - something for the NHPs	Comments noted that Option 2 from Q.H11 is preferred.
H12	166	John	Gerner			Homes for life should be the only guiding principle	The plan will ensure that new homes are sustainable and supported by evidence.
H12	192			Dodford with Grafton Parish Council		<p>Intuitively feel that the mix of new housing in the district could be better; the visible developments seem to be of quite low price and quality, and while the affordable element is vital to preserve, the creation of larger, more prestigious housing, with larger plots and gardens, would be appealing to more affluent buyers, with money to spend in the district. The use of upmarket flats might be worth considering, especially in the centre of Bromsgrove.</p> <p>Development of better-quality homes, near the centre of towns, where people can walk to town centre and able to use public transport better (town house in fill).</p>	Comments noted. We will establish the type and demand of housing in the District through supporting evidence and the housing needs assessment.
H12	195	D R	Clarke			The type of housing needed is the provision of small single storey property for "downsizing" during retirement and also for "starter homes" for young people who are attempting to get on to the housing ladder.	Comments noted. We will establish the type and demand of housing in the District through supporting evidence and the housing needs assessment.
<b>Q.H13: Should we be encouraging a wider range of homes in our rural settlements to ensure their long term vibrancy?</b>							
H13	2	Gill	Lungley	Barnt Green Parish Council		No. A wider range of homes in rural settlements should only be encouraged if there is evidence of employment opportunities in those settlements.	Comments noted. The Local Plan Review will be supported by an up to date evidence base.
H13	4	Barry	Spence	Bentley Pauncefoot Parish Council		We strongly support a wider range of homes in rural areas. The population of this Parish is predominantly people either approaching or already retired. The Parish would benefit from a number of smaller dwellings to enable young people to rent or purchase near their families and/or workplaces.	Comments noted for the support for smaller dwellings in the parish.
H13	5	Kevin	Joynes	Beoley Parish Council		Any development in rural settlements should have a wide range of homes to encourage people to move there.	Comments noted that there is support for a wide range of homes in rural areas.
H13	11	Rosamund	Worrall	Historic England		A wider range of homes in rural settlements could be appropriate but will need to be determined through suitable site assessment in respect of the historic environment and any potential housing development sites that come forward as the Plan progresses.	Comments noted and this will be considered through the site selection process and evidence base.
H13	20	P	Harrison	Wythall Parish Council		YES	Comments for agreement noted.
H13	28	Emily	Barker	Worcestershire County Council		Option 1 appears to have a more pragmatic approach . The number and provision of larger homes are weighted disproportionately to market dwellings.	Comments noted that Option 1 is supported.
H13	34	Sue	Baxter			Yes	Comments for agreement noted.
H13	36	Conrad	Palmer	Fairfield Village community Association		See H 10 (above).	Comments noted from H10.
H13	38	Sue	Green	Home Builders Federation		A wide range of homes should be encouraged in rural settlements to ensure their long term vibrancy. The Council should recognise the difficulties facing rural communities such as acute housing supply and affordability issues. In the last twenty years affordability in Bromsgrove has more than doubled from a median household income to house price ratio of 4.64 in 1997 to 10.24 in 2017. The proposed distribution of housing should meet the housing needs of both urban and rural communities.	Comments noted.
H13	42			Wythall Residents Association		Yes	Comments for agreement noted.
H13	46	Ian	Mercer	Bruton Knowles	Church of England	We consider it appropriate to provide wide range of homes across the District, including rural settlements. New housing provided in these locations should meet the local needs, in terms of size, tenure and affordability.	Comments noted.

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H13	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	Yes, but each settlement is different and has specific needs. Proposals that come forward and that can demonstrate that an account of the needs of the rural settlements has been taken into consideration should be supported. Having a wider range of homes in the settlements will ensure their long- term survival by allowing the renting or purchasing of smaller homes for people wanting to move out of the family home, and for older people who want to downsize after their dependents have left. This will free up the larger family type homes.	Comments for agreement noted.
H13	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	Market signals will contribute towards the provision of a greater diversity of housing delivered amongst the District's more rural settlements, which will both contribute towards the maintenance of essential services within such settlements, but also cater for specific needs of these smaller villages and settlements in the District's countryside.	Comments for agreement noted.
H13	54	Katherine	Else	Claremont Planning	Miller Homes	Housing mix policy that forms part of the new Local Plan should avoid being overly prescriptive and allow for appropriate means of flexibility. Option 1 would be the most likely suitable Option to incorporate into the next phase of the Local Plan – this will ensure that local market signals can be appropriately used in the evaluation of any proposal, rather than referral to a prescriptive requirement that will likely become rapidly out of date as the Plan progresses forwards over time.	Comments for agreement noted for a degree of flexibility within the policy.
H13	66	Susan	Wilkes			believe we should encourage a wider range of homes in rural settlements to ensure long term vibrancy. Older people often want to remain in the neighbourhood in which they have lived for many years because they have friends and/ or family close by. Down sizing is not an option if the variety of properties within their rural village is not available. Providing smaller homes and bungalows will ensure that people are able to remain in the neighbourhood of their choice, in housing that meets their needs and reducing loneliness and isolation that can occur when moving out of the area where family and friends are easily accessible. Encouraging this movement within the community will free up other properties which will naturally increase the population mix.	Comments noted for housing growth in sustainable settlements.
H13	68	Nicole	Penfold	Gladmans		A wide range of homes should be encourages in rural settlements , it is essential that the needs of sustainable and rural settlements across the District are assessed and meaningful growth apportioned to them to ensure their ongoing vitality and viability . Should balance the consideration of the setting and character of settlements against the needs of the local community for new housing and to ensure the long term viability of services and facilities .	Comments noted.
H13	72	Stephen	Peters			Yes	Comments noted. The Local Plan will be supported by a robust evidence base to support the need and demand for housing.
H13	99	Mark	Dauncy	Pegasus	Gallagher Estates	See response to H10	Comments noted and this will be considered through the plan making process.
H13	102	Richard	Ince		Orchard Farm	Smaller houses are needed to keep villages going.	Comments noted and this will be considered through the plan making process.
H13	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Encouraging a wider range of house sizes in rural settlements should first and foremost be encouraged within the affordable housing mix – for both social and intermediate properties. Housing mix could be a policy that, provided there is some flexibility reflecting the existing stock, could be applied to market housing as well, but this could only really work well with larger allocations. It is inappropriate for smaller schemes of up to, say 30 units. We would also encourage the use of a mix that includes some bungalows – which are more likely to appeal to older people as well as people with mobility issues.	Comments noted. The Housing mix policy will be supported by evidence and will allow for an element of flexibility and will be supported by the High Quality Design SPD.
H13	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of H13 encouraging a wider range of house sizes in rural settlements should first and foremost be encouraged within the affordable housing mix – for both social and intermediate properties. Housing mix could be a policy that, provided there is some flexibility reflecting the existing stock, could be applied to market housing as well, but this could only really work well with larger allocations. It is inappropriate for smaller schemes of up to, say 30 units. We would also encourage the use of a mix that includes some bungalows – which are more likely to appeal to older people as well as people with mobility issues.	Comments noted and the evidence base will establish the need in the district.
H13	112	Gareth	Sibley	RCA Regeneration	Piper Group	Should firstly be encouraged within the affordable housing mix - for social and intermediate properties. Housing Mix could be a policy that could be applied to market housing as well, could only really work with larger allocations, inappropriate for sites of up to 30 dwellings. Encourage the use of a mix that includes some bungalows.	Comments noted and the evidence base will establish the need in the district.
H13	113	Gareth	Sibley	RCA Regeneration	CAD Square	In respect of H13 encouraging a wider range of house sizes in rural settlements should first and foremost be encouraged within the affordable housing mix – for both social and intermediate properties. Housing mix could be a policy that, provided there is some flexibility reflecting the existing stock, could be applied to market housing as well, but this could only really work well with larger allocations. It is inappropriate for smaller schemes of up to, say 30 units. We would also encourage the use of a mix that includes some bungalows – which are more likely to appeal to older people as well as people with mobility issues.	Comments for agreement noted.

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H13	120	Michael	Davies	Savills	Cala Homes	BDC should encourage a wide range of homes in rural settlements to increase choice and diversity which encourages rural renaissance. The types of houses provided should be determined by the housing market at the time of determination of an application.	Previous comments for H10 noted.
H13	122	Michael	Davies	Savills	Landowners	Bromsgrove should encourage a wider range of homes in rural settlements to increase choice and diversity required for a rural renaissance. However, as with our response to H11, the types of houses provided should be determined by the housing market at the time of determination of an application.	Comments noted.
H13	123	Michael	Burrows	Savills	Landowners	BDC should encourage a wider range of homes in rural settlements to increase choice and diversity required for a rural renaissance. However, the types of houses provided should be determined by the housing market at the time of determination of an application.	Comments noted and this will be considered through the plan making process.
H13	134	David	Barnes	Star Planning	Richborough Estates	The development of new homes away from Bromsgrove is to be encouraged to ensure the long term vibrancy of other settlements, including large villages such as Barnt Green. With no growth there is the potential for settlements to stagnate and for there to be an aging or declining population unable to support local facilities and services such as primary schools.	Comments noted and this will be considered through the plan making process.
H13	161	Ian	Macpherson		Self	yes - tailored to the demand	Comments noted and this will be considered through the plan making process.
H13	165	Johanna	Wood			Definitely yes	Comments noted and this will be considered through the plan making process.
H13	180	Nicholas	Rands			Yes, there should be a selection of types of property in rural settlements to ensure that there is integration within rural settlements.	Comments noted and this will be considered through the plan making process.
H13	190	Philip	Ingram			A wide range of homes should be encouraged in rural and other settlements to ensure their long term vibrancy. BDC should spread growth such that the benefits of some housing growth should be planned for in most sustainable settlements.	Comments noted and this will be considered through the plan making process.
H13	192			Dodford with Grafton Parish Council		existing communities need sensitive development to preserve and enhance their character.	Comments noted and this will be considered through the plan making process.
<b>Q.H14: What would encourage you to downsize if your current home is bigger than you need?</b>							
H14	1	Tammy	Williams	Alvechurch Parish Council		Most would desire a property with outside space, that's easily managed and would be more cost advantageous for them to run whilst being closer to their main centre for amenities, facilities and easily accessible to public transport options.	Agreed that the location of development is key to ensure that we deliver mixed communities which allows older people the opportunity to continue to be close to & engage with their locality.
H14	4	Barry	Spence	Bentley Pauncefoot Parish Council		Availability of some single-storey dwellings with good sized rooms and gardens.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H14	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council would like to see central government taking measures to encourage older residents to downsize e.g. a reduction in stamp duty - downsizing from a 4 bed to a 3 bed to release equity is often pointless and money is lost in stamp duty	Agreed that the cost of downsizing can have a major impact on whether older people move or not. This can only be addressed through central government .
H14	20	P	Harrison	Wythall Parish Council		The availability of more bungalows would encourage many elderly people to downsize.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H14	34	Sue	Baxter			The availability of smaller property within my community	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H14	35	Peter	King	Campaign to Protect Rural England		This is a complex question, but the first part is to provide a mixture of housing suitable for older people and ensure it is fit for purpose.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H14	36	Conrad	Palmer	Fairfield Village community Association		Somewhere near where a person already lives, where they feel comfortable with their existing support network, to a property of equal or better standing.	Agreed that the location of development is key to ensure that we deliver mixed communities which allows older people the opportunity to continue to be close to & engage with their locality.
H14	42			Wythall Residents Association		The availability of more bungalows would encourage many elderly people to downsize	Comments noted. Through a robust evidence base and consultation with residents in the District we will be able to establish the size, type and tenure of housing needed within the District which will be reflected in the plans policies.
H14	72	Stephen	Peters			The availability of more bungalows would encourage many elderly people to downsize.	Comments noted. Through a robust evidence base and consultation with residents in the District we will be able to establish the size, type and tenure of housing needed within the District which will be reflected in the plans policies.

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H14	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	The provision of appropriate care facilities in appropriate locations.	In line with the NPPF para 61, the size, type and tenure of housing needed in the district. The Local Plan Review process will ensure that there is an appropriate level of older person's facilities to cater for the aging population. Evidence obtained through the SHMA will assess the need for the District.
H14	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	It is our experience that many downsizers do not wish to compromise on ground floor space, but they are often happy to reduce the number of bedrooms they have. This can often result in generously-proportioned bungalows of 1.5 storeys (with room in roof) where there may be a 'flexible' second or third bedroom on the ground floor which can start life as a study.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H14	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	It is our experience that many downsizers do not wish to compromise on ground floor space, but they are often happy to reduce the number of bedrooms they have. This can often result in generously-proportioned bungalows of 1.5 storeys (with room in roof) where there may be a 'flexible' second or third bedroom on the ground floor which can start life as a study.	Comments noted. We will be able to establish the need of the district through gathering supporting evidence.
H14	161	Ian	Macpherson		Self	Independent living with possible carer accommodation	Comments Noted. The evidence base will be updated accordingly to address the scale of need for older's persons accomodation which will inform the policy in the plan.
H14	165	Johanna	Wood			A bungalow in an area of the district that I want to live in with a small garden and 2 bedrooms	Comments noted.
H14	167	John	Raybone			I, and most of my contemporaries are very keen to downsize and to support the younger generation, be we have no desire to move from our local area, where we have worked all our lives and raised families and committed and contributed to the communities in which h we live. Why should we have to give all this up and move maybe miles away to help redress a housing shortage caused by various governments over the years. However, we do feel for our young people and I do believe there is help.	Comments noted. We recognise the needs of different demographics in the District and the location of development is key to ensure that we deliver mixed communities which allows older people the opportunity to continue to be close to & engage with their locality. Through the Local Plan Review process we will be able to address the Districts Housing need for now and the future.
H14	173	Mary	Rowlands			The elderly could be persuaded to move if affordable apartments were to be built in the town centre as there is a need to be near to transport, medical facilities and shops. Little point locating them elsewhere as the public transport is so bad.	Comments noted. It is important that facilities are located within sustainable locations in Town Centres and near other existing settlements in the District.
H14	178	M B	Grinnell			There is a need for smaller bungalows for those who would like to move from a large family home but do not feel ready for sheltered accommodation. The recent development in Fiery Hill Road (Barnt Green) had only 4 bungalows out of 85 properties and none were for sale.	Comments noted. The SHMA evidence base will ensure that the right amount of older person's accomodation is provided in line with para 61 of the NPPF where the size, type and tenure of hosuing should be reflected in planning policies.
H14	180	Nicholas	Rands			I would be encouraged to downsize if there were smaller properties in a similar location and environment.	Comments noted.
<b>Q.H15: What type of home would you want or need as you get older?</b>							
H15	1	Tammy	Williams	Alvechurch Parish Council		Most would desire a property with outside space, that's easily managed and would be more cost advantageous for them to run whilst being closer to their main centre for amenities, facilities and easily accessible to public transport options.	Para 61 in the NPPF highlights the need to ensure the delivery of a wide choice of high quality homes and that they should address the needs of different groups in the community, including older people. It is important that accomodation is located in sustainable locations to ensure that elderly people can feel engaged with their locality.
H15	4	Barry	Spence	Bentley Pouncefoot Parish Council		Many of our older residents have family and friends who visit and stay so 1-bedroom homes are too small. In addition many care for grandchildren and need sufficient space for play, etc. Some 'retirement' developments provide only 1 bedroomed apartments that have small rooms and little or no outdoor space, both factors which make such dwellings unattractive.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H15	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council would suggest suitable accommodation should be built close to transport links - e.g. build a bungalow close to a train station	Comments noted. The NPPF and the District Plan promote sustainable development and we will continue to ensure that this is established through the policies in the plan.
H15	20	P	Harrison	Wythall Parish Council		Smaller houses, bungalows and gated communities for security.	
H15	28	Emily	Barker	Worcestershire County Council		Unlikely that downsizers would impact on education infrastructure, current housing proposals provide little in the way of bungalows to make downsizing an attractive proposition.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H15	34	Sue	Baxter			Smaller houses, bungalows.	Para 61 in the NPPF highlights the need to ensure the delivery of a wide choice of high quality homes and that they should address the needs of different groups in the community, including older people. It is important that accomodation is located in sustainable locations to ensure that elderly people can feel engaged with their locality.

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H15	35	Peter	King	Campaign to Protect Rural England		We perceive (from anecdotal evidence only) that it is difficult for older people to find suitable housing to downsize to. Many aspire to bungalows, for a time when they can no longer manage the stairs, but bungalows are in short and decreasing supply, because they require more land than 2-storey houses and it is a profitable to convert them into (or replace them with) two-storey dwellings. Most of the purpose-built accommodation created in recent years has been sheltered flats, of the type provided by McCarthy & Stone, but this is only one species of what is suitable. Specific policies are needed to provide other kinds.	Comments Noted. The evidence base will be updated accordingly to address the scale of need for older's persons accommodation which will inform the policy in the plan.
H15	35	Peter	King	Campaign to Protect Rural England		This requires careful balancing and further work should be done on issues such as: a.how much housing should be specified for over 55s, b.the balance of bungalows (since for some people these may make them less mobile) and houses, c.the provision of specialist flats, taking account of the disincentive in some schemes for older people resulting from high charges, d.specific requirements for older people's housing, such as assistance on stairs, lifts in flats and other life time requirement issues.	Comments Noted. The evidence base will be updated accordingly to address the scale of need for older's persons accommodation which will inform the relevant housing policies in the plan.
H15	36	Conrad	Palmer	Fairfield Village community Association		One/Two bedroomed bungalow with a small garden, that is near to a small shop and access to public transport, enabling a person to live independently.	Para 61 in the NPPF highlights the need to ensure the delivery of a wide choice of high quality homes and that they should address the needs of different groups in the community, including older people.
H15	37	Julie	O'Rourke	Tetlow King Planning	Housing Association Registered Providers Planning Consortium	The adopted policy within the Bromsgrove District Plan (2011-2030) is a strong policy which supports the provision of homes for the elderly and one which we have recommended to other local planning authorities across the country as an exemplar.  The Council should seek to understand the scale of need for older persons' accommodation through a new SHMA. This is critical to ensuring that the policy is updated where necessary, but also so that appropriate allocations may be made wherever possible to support RPs in delivering homes that meet the specific (and diverse) needs of Bromsgrove's ageing population.	Comments noted. The evidence base will be updated accordingly to address the scale of need for older's persons accommodation.
H15	42			Wythall Residents Association		Smaller houses, bungalows and gated communities for security.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H15	68	Nicole	Penfold	Gladmans		Need a positive policy approach, informed by a robust understanding of the scale of this type and need across the District. Recommend that a specific policy in relation to the provision of specialist accommodation for older people be included. Should provide internally accessible community facilities, reception and care managers office and staff facilities.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H15	72	Stephen	Peters			Smaller houses, bungalows and gated communities for security.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan. Safety and crime prevention within new developments will also be considered as part of the plan making process.
H15	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	The provision of appropriate care facilities in appropriate locations.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H15	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	It is our experience that many downsizers do not wish to compromise on ground floor space, but they are often happy to reduce the number of bedrooms they have. This can often result in generously-proportioned bungalows of 1.5 storeys (with room in roof) where there may be a 'flexible' second or third bedroom on the ground floor which can start life as a study.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H15	161	Ian	Macpherson		Self	Independent living with possible carer accommodation	Comments noted.
H15	165	Johanna	Wood			A home that allows me to be self sufficient and has the option of me having a live in carer should it be required	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.
H15	167	John	Raybone			We are healthy and do not favour communal living with companies such as McCarthy and Stone, and others that tie up our capital and limit our independence. But if there was a more substantial, independent property, that allowed us the option to reinvesting our existing saleable property/collateral into a more desirable living unit/complex, so continuing to capitalizing our investment, I know many of us would move immediately. If such establishments were available within our existing area there'd be an exodus of the retired, freeing up desirable family properties for sale.	Comments noted. In line with para 61 of the NPPF, the size, type and tenure of housing needed within the District will be assessed and reflected in the housing policies within the District Plan.



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H15	180	Nicholas	Rands			As I get older I would want a home in the rural community that allows me to continue my country pursuits and gardening with some assistance if required. I would like to live independently with the opportunity to socialise when desired.	Para 61 in the NPPF highlights the need to ensure the delivery of a wide choice of high quality homes and that they should address the needs of different groups in the community, including older people. It is important that accommodation is located in sustainable locations to ensure that elderly people can feel engaged with their locality.
<b>Q.H16: Which of the following options do you consider is most appropriate and why? [For options see Sep 2018 consultation document, p.32]</b>							
H16	1	Tammy	Williams	Alvechurch Parish Council		Option 1 would be preferred as exact numbers of builds could be ascertained however site acquisition could be a problem, whereas Option 2 negates the difficulty in acquiring a site.	Comments noted for Option 1.
H16	2	Gill	Lungley	Barnt Green Parish Council		Option 2 – developers should provide a number of self-build sites on their larger developments.	Comments noted for Option 2.
H16	4	Barry	Spence	Bentley Pouncefoot Parish Council		We believe asking developers of larger sites to provide a number of self-build plots (Option 2) to be preferable.	Comments noted for Option 2.
H16	9	Alexandra	Burke	Hagley Parish Council		Solution is for the Council to enter into agreements with the developer as to how the site will be delivered including provision for land to be provided for self build schemes and smaller builders. Will also break up the monotony of large developments. Could be done by providing that sites above a certain size (perhaps 50-100 houses) should have a % built on a self build basis or by smaller builders.	Comments noted. The Government is encouraging more people to build or commission their own home. We currently have a Self Build and Custom register which will provide us with an indication of demand for self & Custom build in the District and allow the Council to develop its housing and planning policies to support the kinds of projects that would be most appropriate.
H16	16	Rebecca	McLean	Severn Trent		Option 2 – This allows for a better ability to forecast where the new development will be located and any capacity upgrades that are required could be developed alongside improvements needed for the larger housing site.	Comments noted for Option 2.
H16	20	P	Harrison	Wythall Parish Council		Option 1 – self-build properties are best grouped together on specific small sites.	Comments noted for Option 1.
H16	34	Sue	Baxter			Option 1	Comments noted for Option 1.
H16	35	Peter	King	Campaign to Protect Rural England		It is probably better to require developers of larger sites to make plots available for self-build, rather than to allocate specific sites for them.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district.
H16	36	Conrad	Palmer	Fairfield Village community Association		Option 2.	Comments noted for Option 2.
H16	37	Julie	O'Rourke	Tetlow King Planning	Housing Association Registered Providers Planning Consortium	Should the Council introduce a policy approach towards self- and custom-build housing, any requirement should not be in place of traditional affordable housing requirements. Self- and custom-build have complex requirements for funding and as such is out of the reach of most households who seek affordable housing, nor is this included within the NPPF affordable housing definition. Any policy requirement should be fully viability tested when assessed alongside all other policy requirements to ensure that any requirement will not result in affordable housing being reduced on viability grounds.	Comments noted. The Self-Build & Custom Housebuilding policy will be assessed alongside the affordable housing policy and all requirements will undertake a viability assessment.
H16	38	Sue	Green	Home Builders Federation		The HBF supports the encouragement of self / custom build for its potential additional contribution to the overall housing supply. Option 1 is considered as the most appropriate approach. The Council may also wish to consider a form of exceptions policy for self / custom build homes. Option 2 is inappropriate as this approach only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply.	Comments noted for Option 1.
H16	42			Wythall Residents Association		Option 1 – self-build properties are best grouped together on specific small sites.	Comments noted for Option 1.
H16	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	The self build register has not been made available as part of the consultation and no further details are available to identify the specific locations of interest, or whether plots are still required. Consider there is insufficient evidence to support a policy at this time and recommend that further work is carried out to demonstrate a specific need.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district. The registers will be made available on our website in due course and will indicate what the demand is within the District.
H16	45	Kathryn	Venthams	Barton Willmore	Taylor Wimpey	The creation of policy relating to self-build and custom house building should be on the basis of evidenced need, therefore the most sensible route for the Council to take would be to identify and allocate specific sites (Option 1) for self-build and custom house building reflecting the level of interest.  Option 2 would create a supply beyond the demand required and could potentially impact upon deliverability.  The requirement of those on the Register should also be considered, and the plots they desire. It should be evidenced there is a demand for self build plots within larger housing sites and that they will be utilised.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district.
H16	46	Ian	Mercer	Bruton Knowles	Church of England	We consider Option 1 to be the most appropriate. There is less certainty that a plot will be developed by a self-builder, than a developer. Option2 lessens the certainty of all plots being developed within a scheme.	Comments noted for Option 1.
H16	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	Option 1 – to allocate sites purely to meet the provisions of the self-build market is the most appropriate option as they are difficult to deliver on large sites for practical reasons.	Comments noted for Option 1.

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H16	68	Nicole	Penfold	Gladmans		Support the inclusion of a policy on self build. Option 2 would result in changing housing from one form to another rather than any additional units to the overall supply. Need to consider the practicalities of the policy and ensure it is effective. Should have an element of flexibility and encourage rather than require a specific level of provision. Should also have a mechanism where self build lots revert back to market housing if they are not brought forward within a given timeframe, Raise an element of concern regarding locating on large sites, unlikely to meet demand as these are not the locations self builders want. Important for the Council to monitor demand.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district.
H16	72	Stephen	Peters			Option 1 – self-build properties are best grouped together on specific small sites.	Comments noted for Option 1.
H16	80	John	Pearce	Harris Lamb	Bloor Homes	BHW do not object in principle to the concept of self build, although to date, their experience on some of their other sites where there has been a requirement to provide this is there has been low demand and limited uptake.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district.
H16	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Do not see self-build as making a significant contribution to numbers.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district.
H16	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Do not consider this will make a significant contribution.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district.
H16	87			Indenture		Option 2 is the most appropriate.	Comments noted for Option 2.
H16	93	Gary	Moss	MSC Planning Consultants	Client	Option 1 - given the nature of self build schemes these should come forward similar to that of local market choice housing.	Comments noted for Option 1.
H16	94			Nigel Gough Associates	Aniston Ltd	Option 2 is the most appropriate.	Comments noted for Option 2.
H16	96			Nigel Gough Associates	Mr Stapleton	Consider Option 2 to be most appropriate.	Comments noted for Option 2.
H16	97	Gill	Brown	Nigel Gough Associates	Mr Gwynn and Mr Milne	We consider option 2 to be most appropriate.	Comments noted for Option 2.
H16	99	Mark	Dauncy	Pegasus	Gallagher Estates	Option 1 is the most appropriate, a blanket requirement would not be supported and could result in the over supply of plots which represents an inefficient use of land.	Comments noted for Option 1.
H16	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	My experience, having acted for several years on the provision of over 1000 self build units on a site in Bicester, is that they are not a viable option for larger housing sites (the developer only receives a third of the value, but is expected to provide 100% of contributions; self-builders are generally of a particular age range resulting in an imbalance in population and effect on facilities, etc; I would therefore suggest that smaller sites would be a better way forward, perhaps on the edges of smaller villages, with a full understanding of the implications of such development.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district.
H16	115	John	Breese	Rosconn Strategic Land		Option 1 to allocate sites purely to meet the provisions of the self-build market is more appropriate. As detailed at paragraph 5.21 of the supporting text currently there are only 19 entries on the Council's Self build and Custom Housing building Register. Given this small number it is more appropriate that this need is met directly through allocated self-build sites. Providing self-build plots on larger housing sites could raise practical delivery issues if there is little or no demand.	Comments noted for Option 1.
H16	124	Robert	Lofthouse	Savills	Taylor Wimpey	Option 1 and Option 2.	Comments noted for both options 1 & 2.
H16	134	David	Barnes	Star Planning	Richborough Estates	It would be clearer if small sites were identified for self-build or custom homes in the Local Plan (Option 1). Having such housing on larger residential sites can lead to concerns around responsibility for serving plots and health and safety matters.	Comments noted for Option 1.
H16	161	Ian	Macpherson		Self	Option 2 -builders should provide the plots and services	Comments noted for Option 2.
H16	165	Johanna	Wood			Option 1 is the most appropriate. This ensures control and allows for the optimisation of brown belt sites as a first priority.	Comments noted for Option 1.
H16	192			Dodford with Grafton Parish Council		Like the idea of allowing space for self-build houses: they offer the chance to develop character, diversity and individuality.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district.
<b>Q.H17: Do you have any other comments on the above options?</b>							
H17	4	Barry	Spence	Bentley Pauncefoot Parish Council		Should this be the agreed approach it should not deny self-builders the opportunity to seek permission for other unrelated plots.	Comments noted. We will ensure that the need and demand of self build is addressed by supporting policy and evidence.
H17	9	Alexandra	Burke	Hagley Parish Council		Solution is for the Council to enter into agreements with the developer as to how the site will be delivered including provision for land to be provided for self build schemes and smaller builders. Will also break up the monotony of large developments. Could be done by providing that sites above a certain size (perhaps 50-100 houses) should have a % built on a self build basis or by smaller builders.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district
H17	20	P	Harrison	Wythall Parish Council		Sites for small developers are also required as they cannot compete with national housebuilders who acquire the prime sites.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Housebuilding registers to establish what the demand is in the district



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H17	34	Sue	Baxter			Need to encourage the small and medium developers, particularly in small scale rural developments	Comments noted. The policy will be based on evidence from the Self-Build & Custom Hosuebuilding registers to establish what the demand is in the district
H17	36	Conrad	Palmer	Fairfield Village community Association		H 16 Option 2 will encourage an engaging rather than isolationist community. All builds should be of a high quality not some, e.g. Custom Builds.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Hosuebuilding registers to establish what the demand is in the district
H17	42			Wythall Residents Association		Sites for small developers are also required as they cannot compete with national housebuilders who acquire the prime sites.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Hosuebuilding registers to establish what the demand is in the district
H17	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	If the Council does wish to require the provision of custom and self-build plots within larger schemes, the impact on viability should be considered. Furthermore, flexibility should be built into any policy where there is no demand for self-build plots that have been provided within larger schemes.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Hosuebuilding registers to establish what the demand is in the district. We understand that there will need to be a degree of flexibility on housebuilders if circumstances for self build changes.
H17	68	Nicole	Penfold	Gladmans		Please see response to H16.	Comments noted.
H17	72	Stephen	Peters			Sites for small developers are also required as they cannot compete with national housebuilders who acquire the prime sites.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Hosuebuilding registers to establish what the demand is in the district
H17	112	Gareth	Sibley	RCA Regeneration	Piper Group	Many downsizers do not wish to compromise on ground floor space, but are often happy to reduce the number of bedrooms.	Comments noted.
H17	124	Robert	Lofthouse	Savills	Taylor Wimpey	Plots for the self-build market may be accommodated as part of larger sites, provided there is a mechanism to enable consistent delivery and implementation and to ensure that, where self-build is not taken up, those plots can revert to market homes.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Hosuebuilding registers to establish what the demand is in the district. We understand that there will need to be a degree of flexibility on housebuilders if circumstances for self build changes.
H17	161	Ian	Macpherson		Self	No	Comments noted.
H17	192			Dodford with Grafton Parish Council		Like the idea of allowing space for self-build houses: they offer the chance to develop character, diversity and individuality.	Comments noted. The policy will be based on evidence from the Self-Build & Custom Hosuebuilding registers to establish what the demand is in the district
<b>Q.H18: Do you think we should be aspiring to achieve higher than minimum design standards? If so, should this be 100% of all new homes built or just a proportion to make future adaptations easier?</b>							
H18	1	Tammy	Williams	Alvechurch Parish Council		We should be aspiring to achieve higher than minimum design standards, this should aim to be 100% of all new homes built where possible .	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	2	Gill	Lungley	Barnt Green Parish Council		Yes. 100% of all new homes should be above the minimum design standards.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	4	Barry	Spence	Bentley Pouncefoot Parish Council		We support the adoption and application of the Council's 'High Quality Design' Supplementary Planning Guidance which is currently under consideration. In addition a percentage of dwellings, particularly on larger developments, should be to Lifetime Homes standards.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	9	Alexandra	Burke	Hagley Parish Council		Object should be to design houses that are easily capable of adaptation to the needs of disabled persons, rather than requiring all houses to have those adaptations from the start. Often the cost of designing in these adaptations at the start will be little or nothing, whereas retro-fitting it can be costly.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.

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H18	20	P	Harrison	Wythall Parish Council		The Council should encourage innovative and high-quality designs and also consider permitting prestige one-off homes in rural areas.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	34	Sue	Baxter			Yes, 100%	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	35	Peter	King	Campaign to Protect Rural England		Wherever possible houses should be designed to be capable of adaption. If this is done from the start, the additional cost is likely to be slight. For example a steep staircase with a turn at the top may be unsuitable to have a stair lift installed on it, when the cost of one suitable for a stair lift may be only be a little greater. To require every house to have a stair lift from the start would be ridiculous. Similarly some design adaptations for wheelchair users may have a limited cost.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	36	Conrad	Palmer	Fairfield Village community Association		Bromsgrove DC should lead the way by delivering an ethical policy that all (100%) new builds to achieve higher than a minimum standards.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	38	Sue	Green	Home Builders Federation		If the Council wishes to adopt the higher optional technical standards as policy requirements then this should only be done by applying the criteria set out in the revised NPPF (para 127f & Footnote 42). The optional higher standards should only be introduced on a “need to have” rather than “nice to have” basis. If the Council wishes to adopt the higher optional standards for accessible / adaptable homes the Council should only do so by applying the criteria set out in the NPPG. All new homes are built to Building Regulation Part M standards so it is incumbent on the Council to provide a local assessment evidencing the specific case for Bromsgrove which justifies the inclusion of optional higher standards for accessible / adaptable homes and the quantum thereof. The District’s ageing population is not unusual and is not a phenomenon specific to Bromsgrove alone. The Council should consider the impacts on need, viability and timing before introducing the Nationally Described Space Standards (NDSS).	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	42			Wythall Residents Association		The Council should encourage innovative and high-quality designs.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Not always appropriate or viable to do so. As such a 100% provision for all new dwellings would be considered unsound. Development proposals should be built out in accordance with Building Regulations.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	The optional standards should only be used where there is an evidenced need and where its impact on viability and deliverability of schemes has been fully considered. The Council should therefore not include this standard unless it is fully evidenced and justified.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.

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H18	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	I do not consider that the LPA should be seeking to achieve higher design standards than required through building regulations. If it is the intention that high build standards are required to be delivered by the planning system, this needs to be evidenced and subject to viability testing.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	60	Sara	Jones	Delta Planning	Moundsley Healthcare	<p>We welcome the Council's acknowledgment of this issue and aim of addressing it through the production of the Local Plan Review. The Issues &amp; Options document recognises that people are living longer and would benefit from a wider range of housing options to suit their changing needs. As highlighted at Para 5.15, there are older people who need a greater level of care. This does not apply only to the elderly, but also others with specialist housing and care needs. We welcome the Council's acknowledgment of this issue and aim of addressing it through the production of the Local Plan Review.</p> <p>As outlined in response to Question Q.SI 11, we consider that the land adjacent to Moundsley Hall Care Village offers an opportunity to provide additional specialist housing in a sustainable location. It would also provide a suitable site for a new residential development as we are aware from our employees and clients of the pressures people face in finding a suitable home.</p>	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	68	Nicole	Penfold	Gladmans		<p>Whilst Councils can choose to implement the higher optional standards to do so they must have sufficient evidence to justify the inclusion of such policies.</p> <p>An ageing population is not a unique situation and this should not be sufficient justification for the inclusion of higher accessible and adaptable standards. If the Government had intended this then they would have included mandatory standards via Building Regulations rather than them being optional standards.</p>	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	72	Stephen	Peters			The Council should encourage innovative and high-quality designs and also consider permitting prestige one-off homes in rural areas.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	78	Sean	Rooney	Harris Lamb	Barratt Homes	We consider that it would be most appropriate to require a proportion of new homes to be built so they can make future adaptations easier. Any requirement should only relate to a proportion of the total dwelling proposed, however there should be no resistance if the developer wishes to pursue a higher proportion of starter homes.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	It would be most appropriate to require a proportion of new homes to be built so that they can make future adaptations easier. Not everyone will live in the same house for a lifetime therefore there is no need for every house to be capable of being adapted for another purpose. The Council would have to adhere to criteria within the NPPF should it wish to adopt higher technical standards as policy requirements.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Preference would be to only require a proportion of new homes to be built so that they can make future adaptations easier. Not everyone will live in the same house until they die and therefore, there is no need for all houses to be capable of being adapted. Clearly if someone is intending on living somewhere into their old age they would purchase a house that was capable of future adaptation. However, if people decided to down size or change their living accommodation before they got old, there would be no need for their previous house to be capable of being adapted. As such, any requirement should only relate to a proportion of the total dwellings proposed. Clearly, if there was a desire on behalf of a developer to propose more then this should not be resisted.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Preference would be to only require a proportion of new homes to be built so that they can make future adaptations easier. Here is no need for all houses to be capable of being adapted. Any requirement should only relate to a proportion of the total dwellings proposed.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.

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H18	88	Abbie	Connelly	Lichfields	Taylor Wimpey Strategic Land	Taylor Wimpey agrees that design is an important factor when it comes to building new homes and will be keen to work with the Council and key stakeholders in preparing detailed development proposals on new schemes. Taylor Wimpey invests heavily in the design of their homes in order to produce the highest standard of build. Nonetheless, it would be concerned if unrealistic standard design requirements were imposed that might undermine the viability or deliverability of new homes in Bromsgrove.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	98	Sally	Oldaker			Yes – although not if it makes houses too expensive for most people.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	99	Mark	Dauncy	Pegasus	Gallagher Estates	The introduction of a nationally described space standard would have a significant detrimental effect on the efficiency of land use, should only be introduced where its application can be justified. Broadly supportive of the use of other optional frameworks, such as Building for Life, where appropriate.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Whilst high design standards should always be an aspiration, this needs to be weighed against deliverability. Has the viability of this option been assessed?	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	113	Gareth	Sibley	RCA Regeneration	CAD Square	In respect of H17 and H18, it is our experience that many downsizers do not wish to compromise on ground floor space, but they are often happy to reduce the number of bedrooms they have. This can often result in generously-proportioned bungalows of 1.5 storeys (with room in roof) where there may be a 'flexible' second or third bedroom on the ground floor which can start life as a study.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	Design and building standards that go beyond those set out in the building regulations will need to be clearly justified and consulted on,. Regard should be had to the NPPG that deals with optional technical standards for housing.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	119	Darren	Oakley	RPS Group	Gleeson	RPS supports the aspiration for better and higher design quality in new developments in broad terms. However, should the Council wish to adopt any design and construction standards that go beyond those set out in building regulations, then this will need to be clearly justified and consulted on. In particular, regard should be had to the latest guidance set out in the PPG that deals with housing optional technical standards issued in March 2015. The key point to bear in mind is that:  “... Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.” (PPG Paragraph: 007 Reference ID: 56-007-20150327)	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	120	Michael	Davies	Savills	Cala Homes	The Council should aspire to achieve higher than minimum design standards. No be possible on all sites and therefore should be determined on a site by site basis and based on viability.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H18	122	Michael	Davies	Savills	Landowners	Planning Practice Guidance states that good quality design is an integral part of sustainable development and recognises that planning should drive up design standards. in order to promote Bromsgrove District's vision (page 12) and strategic objective SO11 of promoting high quality design of new developments, the council should aspire to achieve higher than minimum design standards. However, we consider that this will not be possible on all sites and should therefore be determined based on site specific viability.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	123	Michael	Burrows	Savills	Landowners	Planning Practice Guidance states that good quality design is an integral part of sustainable development and recognises that planning should drive up design standards. In order to promote BDC's vision (page 12) and strategic objective SO11 of promoting high quality design of new developments, there is considered to be merit in BDC encouraging the delivery of higher than minimum design standards. However this should only become a policy requirement if there is considered to be sufficient evidence to justify the need and viability of this.  Whilst the Housing Standards Review introduces a new national space standard, this has not been incorporated into the Building Standards and is not a requirement. National housebuilders have a vested interest in building dwellings that meet market needs, which will sell and which are viable to build. We consider that space standards should be left to developers to determine in line with market requirements. If the market demands space standards in line with the optional national standards, then it is more likely that developers will deliver these. The policies in the new Local Plan should be sufficiently flexible to allow this to happen without adding a prescriptive policy burden.  In addition, we acknowledge that the Planning Practice Guidance introduces the ability for LPAs to set higher standards of water consumption in Local Plan policies if there is clear local need to do so and also the ability to introduce the optional building regulations requirements M4(2) for accessible and adaptable homes and M4(3) for wheelchair homes. NPPF paragraph 31 highlights the need for the preparation and review of all Local Plan policies to be underpinned by relevant and up to date evidence. At the present time there is no evidence available to justify the imposition of higher standards. We reserve the right to comment further on this once if evidence to support the need and viability for such an approach is made available.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	134	David	Barnes	Star Planning	Richborough Estates	Any enhancement of the current design and sustainability standard will need specific justification and detailed consideration via the viability appraisal to ensure that delivery is not impeded. In any event, the wider initiatives of Government to promote sustainable homes and modular building techniques will deliver higher standards in any event. These matters do not need to be repeated in the Local Plan.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	161	Ian	Macpherson		Self	Yes - All	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	165	Johanna	Wood			Yes - on all new homes built. Despite this not being legislation all new builds should have solar panels as standard ( or an alternative renewable energy source) and consideration should be given to other sustainable/renewable energy approaches .	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	166	John	Gerner			Yes and 100% of new homes.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	180	Nicholas	Rands			Yes, 100% of all new homes. Let's bring high quality back into house building.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H18	192			Dodford with Grafton Parish Council		Like the idea of allowing space for self-build houses: they offer the chance to develop character, diversity and individuality.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
H18	194	Darren	Oakley	RPS	Clients	RPS supports the aspiration for better and higher design quality in new developments in broad terms. However, should BDC wish to adopt any design and construction standards that go beyond those set out in building regulations, then this will need to be clearly justified and consulted on. In particular regard should be had to the latest guidance set out in the PPG that deals with housing optional technical standards issued in March 2015. The key point to bear in mind is that: “... Local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans.” (PPG Paragraph: 007 Reference ID: 56-007-20150327)	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings and places and good design is a key aspect of the planning process. The Council are open to exploring opportunities for achieving higher than minimum standards of design and to meet the aspiration set out in SO11. However, we are mindful that to become policy, this will need to be adequately evidenced, justified and tested for viability. The responses will be revisited when Preferred Option work is undertaken.
<b>Q.H19: Are there any specific design standards or innovative building techniques that you think we need to address or encourage? If so, what are they?</b>							
H19	1	Tammy	Williams	Alvechurch Parish Council		Design standards should adapt to the built environment, taking into account local materials and design features to blend in with existing properties.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	4	Barry	Spence	Bentley Pauncefoot Parish Council		We would encourage the use of locally distinctive building materials and styles, particularly in the rural areas while not precluding innovative and individual design. We would also encourage techniques those for renewable energy.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	8	Nancy	Bailey	Frankley Parish Council		Accommodation for families should be between two and four bedrooms, with some affordable housing. There should be adequate parking at the front/side of the property to ensure pathways are kept clear.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	8	Nancy	Bailey	Frankley Parish Council		Properties should be no higher than four stories and individual privacy should be maintained.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.

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H19	9	Alexandra	Burke	Hagley Parish Council		- Houses with a porch, storage for bicycle, space for three dustbins, provided with Superfast Broadband connections.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	11	Rosamund	Worrall	Historic England		It should be noted that good design can enhance the historic environment, particularly in respect of Conservation Areas on the Heritage at Risk register. Design policies should encourage quality design and finish. The reference to Building for Life is welcomed in Para 5.24.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	13			Natural England		We strongly recommend reference to Building with Nature.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	16	Rebecca	McLean	Severn Trent		<p>Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <ul style="list-style-type: none"> <li>• Single flush siphon toilet cistern and those with a flush volume of 4 litres.</li> <li>• Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</li> <li>• Hand wash basin taps with low flow rates of 4 litres or less.</li> <li>• Water butts for external use in properties with gardens.</li> </ul> <p>To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website  <a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</a></p> <p>We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p> <p>Additionally, we would want you to encourage building design to reduce surface water runoff from new developments by encouraging green roofs, grey-water recycling, permeable paving, rain gardens and water harvesting solutions such as water butts.</p>	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.

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H19	18	Andrew	Morgan	Warwickshire and West Mercia Constabulary		The Bromsgrove District Plan 2011 – 2030 (adopted January 2017) specifically supports the adoption of Secured by Design in new developments via paragraph 8.199 and part (o) of Policy BDP19 – High Quality Design. WP and WMP request that the Council continue this excellent policy in the review of the Bromsgrove District Plan. This would be in accordance with the Government's National Planning Practice Guidance, which states that designing out crime and designing in community safety should be central to the planning and delivery of new development (paragraph 010 Reference ID: 26-010-20140306). Doing so is also supported by paragraph 91 (b) of the NPPF (2018), which states: 'Planning policies...should aim to achieve healthy, inclusive and safe places which:...are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality space, which encourage the active and continual use of public areas...'	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	20	P	Harrison	Wythall Parish Council		More sustainable forms of construction, energy efficient, carbon-neutral. Encourage use of renewable energy (solar panels). Provision of electric charging points in all new homes.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	28	Emily	Barker	Worcestershire County Council		- High quality housing design - Dwellings should be adaptable and inclusive, catering for the changing needs of individuals - Adequate private and semi-private amenity space per dwelling, with car parking provision - Ventilation and shading	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	31	Rachel	Jones	Better Environment Theme Group		Design standards around life time housing. Use of green infrastructure cycle ways, green spaces, need to be variety of housing types, mixed use, needs to link to existing housing stock and downsizing policies.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	34	Sue	Baxter			Quality, sustainable systems building to speed up delivery	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H19	36	Conrad	Palmer	Fairfield Village community Association		Eco friendly and low carbon footprint new builds.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	42			Wythall Residents Association		More sustainable forms of construction, energy efficient, carbon-neutral. Encourage use of renewable energy (solar panels). Provision of electric charging points in all new homes.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	72	Stephen	Peters			More sustainable forms of construction, energy efficient, carbon-neutral. Encourage use of renewable energy (solar panels). Provision of electric charging points in all new homes.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	78	Sean	Rooney	Harris Lamb	Barratt Homes	The NPPF sets out clearly that good design is fundamental in securing sustainable development. As such, we are of the view that the local plan should steer away from setting specific design standards or requiring innovative building techniques.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	80	John	Pearce	Harris Lamb	Bloor Homes	The Framework sets out clearly that good design is fundamental in securing sustainable development. As such, we are of the view that the Local Plan should steer away fro setting specific design standards or requiring innovative building techniques.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	We are of the view that the Local Plan should encourage good design but steer away from setting specific design standards or requiring innovative building techniques.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
H19	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	The Framework sets out clearly that good design is fundamental in securing sustainable development. As such, we are of the view that the Local Plan should steer away from setting specific design standards or requiring innovative building techniques.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	The NPPF clearly sets out good design principles therefore the Local Plan should steer away from setting specific design standards or requiring innovative building techniques.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	98	Sally	Oldaker			Make sure homes are really energy-efficient – solar panels etc	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	120	Michael	Davies	Savills	Cala Homes	Should encourage new developments to be designed to meet BfL 12, BREEAM Communities, or Lifetime Homes standards. But if this affects viability it should be determined on a site by site basis.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	122	Michael	Davies	Savills	Landowners	To meet strategic objective SO11, Bromsgrove District should encourage new developments to be designed to meet 'Building for Life 12', 'BREEAM Communities', or 'Lifetime Homes' standards. However, if this affects viability and is at the detriment of development, then these specific design standards may not be achievable. This should be determined on a site-by-site basis.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	123	Michael	Burrows	Savills	Landowners	To meet strategic objective SO11, there is an opportunity for BDC to encourage new developments to be designed to meet 'Building for Life 12', 'BREEAM Communities', or 'Lifetime Homes' standards. The practical application of this approach should be left to developers to consider on a site-by-site basis and should not become a Local Plan policy requirement unless there is considered to be sufficient evidence to justify the need and viability of this approach.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.

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H19	124	Robert	Lofthouse	Savills	Taylor Wimpey	Compliance with Building Regulations should apply, unless robust justification provided for any other standards, including related to the viability of delivery.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	152	Sue	Skidmore			Houses should be built with potential for future expansion or change of use. They should be built with enhanced energy efficiency and incorporate such things as water recycling and solar power.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	156	Fred	Carter			Bromsgrove District Council need to be more prescriptive with regards to National Space Standards and Energy-efficiency. The UK are well behind in their Zero Carbon targets and any new houses planned must comply now! Look at standards such as Passivhaus for guidance.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	161	Ian	Macpherson		Self	Something like the former Code for Sustainable Homes level 5 to provide sustainability.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	165	Johanna	Wood			Yes - on all new homes built. Despite this not being legislation all new builds should have solar panels as standard ( or an alternative renewable energy source) and consideration should be given to other sustainable/renewable energy approaches .	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	166	John	Gerner			Yes, passive house	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.

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H19	173	Mary	Rowlands			Build environmentally friendly homes with improved energy efficiency and lower carbon emissions.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	180	Nicholas	Rands			I think properties should have larger rear gardens with individual access, more robust internal walls, larger rooms, homes for families to have minimum of three bedrooms, two bedroom houses to have potential to extend to three bedrooms, more detached properties, off road parking for at least two vehicles, provision of electric charging points, lower density of build on developments.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H19	192			Dodford with Grafton Parish Council		Like the idea of allowing space for self-build houses: they offer the chance to develop character, diversity and individuality.	Comments are welcomed and noted. In line with Para 124 of the NPPF, the creation of high quality buildings, places and good design is a key aspect of the planning process. Officers agree that some design frameworks such as Buildings for Life can be useful tools to encourage high quality design. The Council is mindful of tools, techniques and frameworks to assess and improve the design of development and will determine which of these are most appropriate to inform the District's design policies. We are also mindful of NPPG advice relating to design standards and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
<b>Q.H20: Which of the following options do you consider is most appropriate and why? [For options see Sep 2018 consultation document, p.33]</b>							
H20	1	Tammy	Williams	Alvechurch Parish Council		Option 1: Extend existing facilities within the District including for families passing through the District	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	2	Gill	Lungley	Barnt Green Parish Council		Option 1 – existing sites should be extended for gypsies, travellers and travelling showpeople.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	4	Barry	Spence	Bentley Pauncefoot Parish Council		We consider Option 3 to be the most acceptable option. Gypsies regularly stay in our Parish and whilst they do not cause problems their usual stopping place is not totally suitable for them.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.

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H20	9	Alexandra	Burke	Hagley Parish Council		The objective should be to assimilate the position of travellers with that of the settled community. Advantage of BDC continuing to have a Transit Site, and being prepared to require those entering playing fields, parks, to move there. The criteria for allocation of Travellers' sites should be the same as housing sites for the settled community.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	20	P	Harrison	Wythall Parish Council		Option 1 – extending the current facilities is the most appropriate taking into account that existing family groupings do not welcome outsiders into their community.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	34	Sue	Baxter			Option 1	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	36	Conrad	Palmer	Fairfield Village community Association		Mixture of Options 2 & 3.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	42			Wythall Residents Association		Option 1 – extending the current facilities is the most appropriate taking into account that existing family groupings do not welcome outsiders into their community.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	72	Stephen	Peters			Option 1 – extending the current facilities is the most appropriate taking into account that existing family groupings do not welcome outsiders into their community.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	98	Sally	Oldaker			Option 2: Allocate a new site for permanent pitches within the District Option 3: Allocate land for a transit site for families passing through the District Both of the above! If there are specific sites for travellers, they are less likely to use playing fields/car parks etc which can cause problems in the community.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.

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H20	100	Ryan	Bishop			Option 1 – this is a contentious issue when discussed so keeping existing areas sounds a safer approach to reducing objections / making growth manageable.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	161	Ian	Macpherson		Self	Option 1 where practicable.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	165	Johanna	Wood			Option 1 - we already have 24 permanent sites in the district. Option 3 may also be a necessary requirement. However, these should be part of the permanent site expansions. I have an issue that especially for transiting families school places have to be provided which reduces spaces for permanent residents who pay their taxes etc.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	176	Mr & Mrs J D	Winslow			If it is considered that Bromsgrove needs to provide further pitches for travellers, we suggest that, given their economic activities, any sites allocated or expanded should have easy access to transport highways. The need for access to schools, social and health services would point to an urban or semi urban, rather than a rural, location – organised sites in preference to ad hoc arrangements.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H20	192			Dodford with Grafton Parish Council		The District should welcome any communities that would like to live here, if they contribute to the welfare and improvement of our District. As with affordable housing, I do not believe that the concept of any kind of 'ghetto' is a healthy one and would incentivise newcomers to integrate rather than going for 'separate development'.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
<b>Q.H21: Do you have any other comments on the above options?</b>							
H21	4	Barry	Spence	Bentley Pouncefoot Parish Council		It is stated in the SA at Section 5.5, paragraph 5.5.24 that the number of pitches at the Sheltwood Lane site is not clear. We believe that on appeal the owners were given permission for 1 static and 2 mobile caravans.	This information is noted.
H21	7	Mark	Davies	Environment Agency		To inform your options, this will need to be informed by a SFRA to ensure that development sites are located appropriately. Matters relating to flood risk are of particular importance for gypsy and travellers sites, permanent or transit, as flooding can present problems and greater risk for developments such as caravans and mobile homes. In the PPG, non-permanent caravans etc. are considered 'More Vulnerable', as opposed to 'Highly Vulnerable' (Caravans, mobile homes and park homes intended for permanent residential use'). Sites within Flood Zone 3 should be discounted. Sites within Flood Zone 2 may be considered (subject to suitable warning and evacuation measures), using the Sequential Approach, if it has been demonstrated that there are no suitable sites available at a lower risk of flooding i.e. Flood Zone 1.	The comments relating to vulnerability of sites and flood risk are noted and agreed. An updated SFRA will inform the evidence base for the District Plan Review.
H21	9	Alexandra	Burke	Hagley Parish Council		The objective should be to assimilate the position of travellers with that of the settled community. Advantage of BDC continuing to have a Transit Site, and being prepared to require those entering playing fields, parks, to move there. The criteria for allocation of Travellers' sites should be the same as housing sites for the settled community.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.

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H21	11	Rosamund	Worrall	Historic England		The Plan will need to consider the interrelationship between the historic environment and any potential development sites for Gypsies, Travellers and Travelling Showpeople accommodation.	Noted and agreed.
H21	20	P	Harrison	Wythall Parish Council		Transit sites are not required and can lead to friction within local communities. Sites for travelling show people should be an exception and considered favourably if there is demand.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H21	27			Stratford On Avon District Council		SDC notes that failure to effectively meet needs for Gypsy and Travellers can impact on adjoining Districts. SDC would encourage Bromsgrove District Council to ensure it fully meets its needs for the whole plan period.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H21	28	Emily	Barker	Worcestershire County Council		Agree that all locations should have good access to education and school places, health, welfare and employment.	Noted and agreed.
H21	34	Sue	Baxter			Transit sites are not required Sites that mix permanent and transit do not work and cause friction	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H21	35	Peter	King	Campaign to Protect Rural England		We will merely say that Travellers (of all kinds) have as much right to a home as the settled community; not greater or less. For one thing, the children of travellers who are continually on the move tend to miss out on getting a proper education. Pitches should be provided in the kind of places where houses might have been built. It is not right for those without a place to live should be hounded from one illicit site to another. It appears that transit facilities are necessary, so that those invading parks, playing fields, and other public spaces; also private land can be required to move to the transit site at one hour's notice, rather than days or weeks, as can happen at present.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H21	42			Wythall Residents Association		Transit sites are not required and can lead to friction within local communities. Sites for travelling show people should be an exception and considered favourably if there is demand.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H21	72	Stephen	Peters			Transit sites are not required and can lead to friction within local communities. Sites for travelling showpeople should be an exception and considered favourably if there is demand.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
H21	161	Ian	Macpherson		Self	No	Noted.
H21	165	Johanna	Wood			Option 1 - we already have 24 permanent sites in the district. Option 3 may also be a necessary requirement. However, these should be part of the permanent site expansions. I have an issue that especially for transiting families school places have to be provided which reduces spaces for permanent residents who pay their taxes etc.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.

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H21	192			Dodford with Grafton Parish Council		The District should welcome any communities that would like to live here, if they contribute to the welfare and improvement of our District. As with affordable housing, I do not believe that the concept of any kind of 'ghetto' is a healthy one and would incentivise newcomers to integrate rather than going for 'separate development'.	Comments are welcomed and noted. The accommodation needs of Gypsies, Travellers and Travelling Showpeople needs to be identified, as with all other housing requirements in the local housing needs assessment. The County wide GTAA has recently been updated to include the latest available evidence to identify the accommodation needs across Bromsgrove District. The findings of this study and any further updates form part of the evidence base and along with other evidence, national policy and guidance will influence the policy preparation and any site allocations.
<b>Q.H22: Do you think that there are any housing issues that we have missed? If so, please tell us what they are?</b>							
H22	9	Alexandra	Burke	Hagley Parish Council		Reiterate that the needs of Bromsgrove town and its immediate vicinity ought to be assessed separately from the rest of the District. In settlements with no current or prospective Neighbourhood Plan, BDC should produce a separate (non strategic) Site Allocations Plans, which should be open to being overridden by a future Neighbourhood Plan.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	20	P	Harrison	Wythall Parish Council		The District has lost many of its sheltered housing schemes. Consideration should be given to encouraging new sheltered schemes catering specifically for vulnerable young adults and people with various disabilities including autism and dementia. Moundsley Hall Care Village on the boundary with Birmingham has the potential for growth to cater for the needs of the elderly in both north Worcestershire and the conurbation. Development aspirations have been continuously thwarted by the planners and hindered by the Green belt location and the site owner has spent considerable sums on abortive studies and assessments.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	23	Ashley	Baldwin	Lichfield District Council		It is noted that the unmet housing need resulting from the GBHMA shortfall is not addressed within Section 5, Housing. It only provides options to meet Bromsgrove's own local need defined at paragraph 4.20 and further referenced at paragraph 5.5. The omission of a quantum associated with the GBHMA shortfall needs to be addressed and will be detrimental to understanding where and how wider growth can be resolved in a sustainable manner within Bromsgrove District.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	27			Stratford On Avon District Council		There may be residents within Stratford-on-Avon District whose affordable housing needs are best met within Bromsgrove District. SDC would be keen to continue to work with Bromsgrove and other adjoining Districts to ensure effective cascade mechanisms are in place to help meet housing needs of residents of Stratford-on-Avon District.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	28	Emily	Barker	Worcestershire County Council		Supported living for all ages, and not purely for the elderly.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	31	Rachel	Jones	Better Environment Theme Group		Empty homes – Although this may sit within strategic housing it has the potential to be utilised and provide additional housing	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	31	Rachel	Jones	Better Environment Theme Group		Heat networks – need to ensure that new developments undertake a feasibility assessment and clear evidence need to be seen for NOT delivering a heat network.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.



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H22	31	Rachel	Jones	Better Environment Theme Group		<p>•Improved energy efficiency to address climate change and ensure 'healthier' homes we need to see more generic documents around standards. It is important to review the evidence base on this to show what can be achieved through improved thermal efficiency and therefore the reduction in kWh and carbon emissions. The Green Building Council have developed a resource for LA on this. Milton Keynes has a sustainable construction policy that ensure the 'as built' performance matched the calculated design performance.</p> <p>Renewable – need specific targets not just to encourage.</p>	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	34	Sue	Baxter			Half way housing for young adults leaving the care system and other vulnerable adults. Sheltered housing	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	36	Conrad	Palmer	Fairfield Village community Association		NO.	Noted.
H22	37	Julie	O'Rourke	Tetlow King Planning	Housing Association Registered Providers Planning Consortium	<p>Housing in perpetuity: When drafting any affordable housing policies Government guidance states that affordable housing may be secured for future eligible households, however the requirement for affordable housing to be retained in perpetuity is only raised in relation to housing delivered on rural exception sites. Please note however that this is not the case for entry-level exception sites.</p> <p>The term has a clear legal meaning which is recognised within the NPPF and which is appropriate and supported by our members as this helps to secure land for delivery of affordable housing in areas where housing delivery would otherwise not be supported.</p> <p>Securing affordable housing in perpetuity more widely is not supported for a number of reasons, foremost of which is that it restricts lenders' appetite to fund development, as mortgage provision becomes more difficult with greater restrictions on individual properties. Private companies will not typically invest in developments if there is no prospect of realising the original investment and any returns. As the availability of grant funding has been significantly restricted in recent years, the ability of Registered Providers to obtain private finance for the development of new affordable housing should not be further restricted by unnecessary S106 clauses.</p> <p>As well as restricting future ability to recycle housing stock where necessary to respond to local circumstances, and when used in a rigid fashion also prevents tenants from being able to staircase to full home ownership in intermediate affordable housing. This latter point is particularly critical as inability to staircase to full home ownership depresses interest in such housing, as potential purchasers look instead to Help to Buy products. This is unhelpful and restricts Registered Providers' ability to fund development over the long term; as receipts from the sales of shared ownership properties are funnelled directly back into delivering more affordable housing it is perverse to prevent staircasing. We ask that the Council reconsider this approach and look to other mechanisms where necessary, allowing Registered Providers to recycle public subsidy to reinvest in new stock. Securing affordable housing through conditions and Section 106 Agreements can be achieved without further restricting development potential.</p>	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	42			Wythall Residents Association		The District has lost many of its sheltered housing schemes. Consideration should be given to encouraging new sheltered schemes catering specifically for vulnerable young adults and people with various disabilities including autism and dementia.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	72	Stephen	Peters			The District has lost many of its sheltered housing schemes. Consideration should be given to encouraging new sheltered schemes catering specifically for vulnerable young adults and people with various disabilities including autism and dementia. Moundsley Hall Care Village on the boundary with Birmingham has the potential for growth to cater for the needs of the elderly in both north Worcestershire and the conurbation. Development aspirations have been continuously thwarted by the planners and hindered by the Green belt location and the site owner has spent considerable sums on abortive studies and assessments.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.

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H22	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Under paragraph 5.3 the bullets mention elderly people, but then neglect to mention housing for people with special needs, this needs to be reinstated.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Until the council make affordable housing need clearer in their evidence base, it will be difficult to answer many of the questions set out on page 23. The council should publish how many affordable housing losses there have been and account for how many are likely to be lost in future, so that a sensible affordable housing target can be identified. The tenure mix should reflect reality with a sensible prediction of how much (genuine) take up there will be for intermediate or market affordable properties given how expensive market housing now is.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	At paragraph 5.9 the Council state that since 2011, 470 affordable housing units have been constructed – being 28.9% of all housing completions. Not only is this not good enough, this figure is misleading. The Council need to make it clear what the net completion figure is. That's is how many affordable homes have been delivered, taking account of losses under Right to Buy. The Council should also state here what the affordable housing need is: how many people are currently waiting for an affordable home in Bromsgrove District? Those are real people, in real need now. If their needs were to be met, how many homes would have to be built if the delivery rate of 28.9% was perpetuated?	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Under paragraph 5.3 the bullets mention elderly people, but then neglect to mention housing for people with special needs, this needs to be reinstated.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	155	Erica	Loftus			Alvechurch: A number of small developments has led to congestion. Would suggest that housing density is at its limit. Many houses have ended up as buy to let, fuelling the landlord owned housing base rather than providing privately owned homes.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	156	Fred	Carter			A facility immediately adjacent to M5 J4 would make for easy entrance and exit for travellers.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	156	Fred	Carter			Public Sector land that is suitable for residential development needs to be prioritised rather than being sat on for years. The old Council Office has made front page headlines in the Chronicle due to the monies wasted in keeping the old building empty. Even our local MP, Sajid Javid, has written to the Council trying to unlock the situation without success. A Council Housing team needs to be established as a priority to progress such sites which have been stalled under the privatised "management" of Place Partnership.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	161	Ian	Macpherson		Self	No	Noted
H22	173	Mary	Rowlands			How many empty homes are there in the district which can be utilised.	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.

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H22	177	Mr & Mrs D	Went			<p>No provision for 50/60 year olds, many of whom are rattling around in 4 bedroom homes. We do not all want leasehold flats and expensive service charges at this age. Development of bungalows would be ideal.</p> <p>Burcot Lane 'Old Council House' - This area has many elderly people living in flats-they need easy access to shops and facilities. Many of these residents are vulnerable. Consideration must given to these residents when developing the site. Perhaps consider 50's/60's and disabled.</p> <p>Younger people and families can live further away from town as they are more mobile.</p>	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	182	Nick	Psirides			<p>Fields previously used as market gardens etc., should be treated as 'brown field' sites allowing limited development up to say eight or so dwellings.</p> <p>This approach will not differ much to what is happening in Barnt Green. The rear and side gardens of some large houses have been classified as brown field sites and are being used for such a purpose. There have been examples of perfectly good and serviceable houses and bungalows being demolished to gain access to a large rear garden for development.</p>	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
H22	192			Dodford with Grafton Parish Council		<p>The District should welcome any communities that would like to live here, if they contribute to the welfare and improvement of our District. As with affordable housing, I do not believe that the concept of any kind of 'ghetto' is a healthy one and would incentivise newcomers to integrate rather than going for 'separate development'.</p>	Comments are welcomed and noted. As part of our emerging evidence base, we will need to determine the specific housing needs of the District as well as taking account of the wider GBHMA unmet need. We will also need to be mindful of the recently published advice in the NPPG relating to housing and any possible changes to guidance that may influence policy preparation. The responses received will be revisited when Preferred Options work is undertaken.
<b>Q.E1: Which of the following options do you consider is most appropriate and why? [For options see Sep 2018 consultation document, p.37]</b>							
E1	1	Tammy	Williams	Alvechurch Parish Council		<p>Option 2 seems the sensible place to start considering the current economic climate, but also planning for an uplift post Brexit years should be factored in for years 2025 - 2041, whilst aligning housing growth to option 4 must be kept in mind</p>	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	1	Tammy	Williams	Alvechurch Parish Council		<p>Specifically to respond to Q. E1, option 4 aligns best with the economic objectives in the BDC Cabinet paper of April 2017 and it's the properly ambitious option for Bromsgrove as an inevitable part of the West Midlands' city region where business growth and associated housing enlargement have to be considered together.</p>	Noted. The relationship between housing and employment growth will be very important.
E1	2	Gill	Lungley	Barnt Green Parish Council		<p>Option 1 – plan for minimum level of employment development across the plan period, relating to assessed needs.</p>	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	4	Barry	Spence	Bentley Pauncefoot Parish Council		<p>We would support Option 2.</p>	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	5	Kevin	Joynes	Beoley Parish Council		<p>Development should take account of existing employment accommodation within the District which is currently vacant. Any new development which is permitted should be on a scale which aligns with the levels of housing growth.</p>	Noted. Current vacancies would be factored into the calculations in the Employment Land Review before generating a requirement for new employment land and premises.
E1	9	Alexandra	Burke	Hagley Parish Council		<p>May be feasible to move the town of Bromsgrove towards a balance between homes and employment, but probably not the rest of the district. Businesses expansion needs should clearly be met, perhaps with a modest uplift, but more development should be resisted unless there is compelling evidence. Several employment sites have been used for housing in recent years, including the Longbridge Site and a site at Stoke Works. Furthermore a Care Home has recently been submitted for the employment element of the Hagley ADR. Therefore question whether much demand really exists. Suggests that the estimates of potential employment growth are based on an aspirational (and wholly unrealistic) Strategic Economic Plan.</p>	Noted. Losses of previous employment sites does not necessarily equate to there being no demand for employment growth in the district. These sites may have been poorly located or not suited to the needs of modern businesses. The Council appreciate that evidence in the form of an Employment Land Review will be needed to better inform us of the development land needs of current and future businesses and how and where these can be met in the district.
E1	20	P	Harrison	Wythall Parish Council		<p>Option 3 – the District needs more local employment for existing and future working age adults.</p>	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	27			Stratford On Avon District Council		<p>Option 4 is likely to be the most robust approach to meeting employment needs.</p>	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.

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E1	32	Robert	Spittle	Bromsgrove Economic Theme Group		<p>Option 4 - Without doubt the simple answer to this is yes, employment development has to be commensurate if not ahead of housing growth.</p> <p>Why – currently Bromsgrove has 26,000 out commuters with only 19,000 in commuters, the out commuters therefore represent 58% of the workforce, couple this with the fact only 4% of travel is done by train above all the transport infrastructure simply wont work let alone the stagnant growth in the economy. In addition to this employment growth has to be aligned to wages and cost of living in the District.</p>	Noted. An Employment Land Review will be needed to better inform the Council of the development land needs of current and future businesses. The Council recognise the current imbalance between out commuters and in commuters and the impact this has on the traffic pressures in the district.
E1	34	Sue	Baxter			Option 4 – a buoyant local economy needs a net balance of housing growth and economic development	Noted. The relationship between housing and employment growth will be very important.
E1	42			Wythall Residents Association		Option 3 – the District needs more local employment for existing and future working age adults.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	47	Michael	Jones	Caddick Land		To help redress the large imbalance between the working population and the level of existing employment opportunities within Bromsgrove and to therefore help reduce commuting, the District should plan for significant additional employment growth . A mix of options 3 and 4 should be pursued.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	<p>The SA Scoping assessment has established that out-commuting of Bromsgrove’s residents is high, with 26,108 people going outside of the District to work each day, compared to 18,892 commuters coming into the District. The majority of these commuters go to Birmingham, Solihull, Redditch and Dudley. The average weekly earnings of people who work in the District are also lower than both the regional and national average.</p> <p>To deal with this problem, new sites should be allocated to assist with dealing with both out-commuting and low wages. Four options are set out within the SA as follows: Option 1: plan for a minimum level, relating to assessed needs; option 2 plan for a small uplift in jobs and land requirement in the region of 10% above minimum evidence (to provide for market flexibility and choice of sites but not enough to significantly alter Bromsgrove’s current employment offer); option 3 – plan for a large uplift in jobs and land requirement (to allow for market flexibility and choice of sites as well as aiming for significant inward investment in the District in the form of major employment development) and option 4 – plan for a level of employment development that aligns with levels of housing growth in the district over the course of the Plan period, including consideration of any housing or employment shortfall arising from neighbouring local authorities.</p> <p>Based upon an assessment of the likely impacts of these alternatives discussed within the SA, I consider that that option 3 is the most appropriate to deal with the issue of out commenting and low local salaries.</p> <p>Option 4 is confusing. The level of housing growth is determined by the standard methodology that merely takes past household growth trends and adds and element for affordability ratios. It does not take into account the economic strategy of the Plan.</p>	Support for Option 3 noted. Option 4 refers to the ability to plan for a housing requirement in excess of that determined through the standard methodology, for instance, by following a deliverable growth strategy (see PPG Paragraph: 010 Reference ID: 2a-010-20190220).
E1	58	Karin	Hartley	Delta Planning	Bloor Homes Western & Maximus	<p>Given the significant under-provision of land for employment in the past resulting in a lack of investment and economic growth in the District, we consider that a step change in employment development is needed to improve Bromsgrove’s economic performance. As a minimum the Local Plan should therefore plan for a level of employment development that keeps pace with levels of housing growth in the District over the course of the Plan period (Option 4). This will, however, do little to address existing out-commuting flows and we would therefore suggest that the Local Plan should encourage a significant uplift in jobs and land requirements. In determining the level of employment growth to be delivered in Bromsgrove, account needs to also be taken of the shortfalls in employment land in the wider market area.</p> <p>This will require the allocation of new employment sites, which given the District’s Green Belt coverage, will inevitably include the release of Green Belt land to accommodate employment growth.</p>	Noted. An Employment Land Review will be an essential piece of evidence that is needed in the coming months to better inform the Council of the development land needs of current and future businesses. The likely need for Green Belt land to be released to accomodate employment development is recognised.

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E1	59	Karin	Hartley	Delta Planning	Maximus	<p>Given the significant under-provision of land for employment in the past resulting in a lack of investment and economic growth in the District, we consider that a step change in employment development is needed to improve Bromsgrove's economic performance. As a minimum the Local Plan should therefore plan for a level of employment development that keeps pace with levels of housing growth in the District over the course of the Plan period (Option 4). This will, however, do little to address existing out-commuting flows and we would therefore suggest that the Local Plan should encourage a significant uplift in jobs and land requirements. In determining the level of employment growth to be delivered in Bromsgrove, account needs to also be taken of the shortfalls in employment land in the wider market area.</p> <p>Fully agree that providing the right sites to enable business growth in the District will be crucial to rebalancing the local economy of the District (Para 4.12) and that the M42 is an economic advantage which could be better used to attract high value industrial firms (Para 4.13).</p> <p>Employment growth should be focused in locations that are attractive to the market and benefit from excellent access to the strategic road network</p>	Noted. An Employment Land Review will be an essential piece of evidence that is needed in the coming months to better inform the Council of the development land needs of current and future businesses. The comments regarding the potential to make more of the economic advantages of the M42 are noted. It will be important to balance access to the strategic road network with sustainability and particularly the ability for workers to have a range of travel options to get to work.
E1	72	Stephen	Peters			Option 3 – the District needs more local employment for existing and future working age adults.	Noted. An Employment Land Review will be an essential piece of evidence that is needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	78	Sean	Rooney	Harris Lamb	Barratt Homes	Option 4 is considered to be the most appropriate in this instance. The priority should be on addressing housing issues first.	Noted. The balance in terms of land requirements will be weighted towards housing but it is important that the amount of housing and employment are broadly proportionate.
E1	80	John	Pearce	Harris Lamb	Bloor Homes	We consider that Option 4 would be the most appropriate in the first instance. Whilst it may be desirable to try and also secure economic growth and job creation, the Plan needs to be realistic in what it seeks to achieve at the current time. We therefore, consider that the provision of employment land should be commensurate with existing levels of housing growth although BHW would be supportive of the Council taking a more ambitious stance in terms of securing economic growth, as this would result in a greater need for additional housing in the District.	Noted. The balance in terms of land requirements will be weighted towards housing but it is important that the amount of housing and employment are broadly balanced. Until the employment land requirement is generated through the Employment Land Review and a Housing Needs Study is produced to determine whether there should be any deviation from the standard methodology, it is presumptuous to say that an ambitious stance would result in additional housing.
E1	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Option 4 is considered to be most appropriate. Whilst not adverse to the Council taking a more ambitious stance in terms of economic growth, the priority should be on addressing housing issues first. The plan review is being undertaken because of a shortfall in dwellings from the previous BDP, the prime focus should therefore be on meeting the District's housing needs and also accommodating some of the unmet needs of Birmingham.	Noted. The balance in terms of land requirements will be weighted towards housing but it is important that the amount of housing and employment are broadly proportionate.
E1	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Option 4 - The prime focus should be on meeting the District's housing needs, whilst also accommodating some of the unmet needs of Birmingham. Whilst it may be desirable to try and also secure economic growth and job creation, the Plan needs to be realistic in what it seeks to achieve at the current time. We, therefore, consider that the provision of employment land should be commensurate with existing levels of housing growth. Whilst we would not be adverse to the Council taking a more ambitious stance in terms of securing economic growth, we feel the priority should be on addressing housing issues first.	Noted. The balance in terms of land requirements will be weighted towards housing but it is important that the amount of housing and employment are broadly proportionate.
E1	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Option 4 would be most appropriate. Whilst it might be desirable to try and also secure economic growth and job creation, the Plan needs to be realistic in what it seeks to achieve. The provision of employment land should be commensurate with existing levels of housing growth. The priority should be on addressing housing issues first.	Noted. The balance in terms of land requirements will be weighted towards housing but it is important that the amount of housing and employment are broadly proportionate.
E1	92	Andrew	Watt	Maze Planning Solutions	Client	Option 3 should be preferred. It is consistent with the preference to provide for more significant levels of employment growth from Q.SI 5. Planning for above minimum evidence rates of growth will provide a broader choice and range of sites to meet differing employment needs and support realisation of the employment growth aspiration.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	98	Sally	Oldaker			I think Option 2: Plan for a small uplift in jobs and land requirement, in the region of 10% above minimum evidence requirements – because there isn't a lot of room to do more.	It should be noted that even a low level of employment development is likely to require land to be released from the Green Belt in order to accommodate additional employment requirements.
E1	99	Mark	Dauncy	Pegasus	Gallagher Estates	Option 4 is the most appropriate as a minimum. Increased employment provision to address out commuting in turn results in further increased housing demand.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Option 3: more local employment is required to help to reduce the amount of commuting.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.

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E1	108	Chris	Quinsee	Q&A Planning Services	Client	The Issues and Options consultation document notes the key link between expansion of employment land supply and reducing wage differentials. Providing the right sites to enable business growth in the District provides a wider range of local employment opportunities for those who don't wish to commute, (whether by attracting new inward investment from businesses located outside the District or allowing existing resident businesses to expand), which in turn will assist in reducing the discrepancy between average weekly employee earnings and average weekly resident earnings. The consultation document notes that the local economy 'lacks a whole tier of medium and larger sized firms and the District lacks property and land for such firms to grow into' ((paragraph 6.12). This is not a satisfactory nor sustainable position, and can force successful local businesses to leave the district if they wish to expand (paragraph 6.3). Accordingly, we believe that it is imperative that the Council plans for appropriate expansion of employment land provision. Options 1 and 2 are not likely to be sufficiently expansive to address the key issues that the Council has identified. Option 3 is preferable; and Option 4 presents difficulties in that aligning employment and housing growth implies that the 'status quo' will be maintained, and that employment land growth will not fully address problems caused by existing shortfalls in provision.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of E1 and E2, the difficulty with predicting the requirement for employment land is that there is no official 'rolling supply' requirement (as per the now abolished Regional Spatial Strategy for the West Midlands). In order to reverse the level of out-commuting, new development opportunities to accommodate micro, small and medium sized enterprises within the District need to be considered carefully, along with providing for the burgeoning requirement for freehold premises. In respect of potential options, we would like to see a multi-faceted approach, looking at new designations around the District, including mixed-use sites.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be an essential piece of evidence that is needed in the coming months to better inform the Council of the development land needs of current and future businesses. A variety of forecasting measures can be used to predict the employment land requirement, including using past take up rates and projecting these forward.
E1	112	Gareth	Sibley	RCA Regeneration	Piper Group	Difficulty as there is no official rolling supply requirement . New development opportunities to accommodate micro, small and medium sized enterprises within the District need to be carefully considered, along with providing freehold premises.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be an essential piece of evidence that is needed in the coming months to better inform the Council of the development land needs of current and future businesses. A variety of forecasting measures can be used to predict the employment land requirement, including using past take up rates and projecting these forward.
E1	113	Gareth	Sibley	RCA Regeneration	CAD Square	In respect of E1 and E2, the difficulty with predicting the requirement for employment land is that there is no official 'rolling supply' requirement (as per the now abolished Regional Spatial Strategy for the West Midlands). In order to reverse the level of out-commuting, new development opportunities to accommodate micro, small and medium sized enterprises within the District need to be considered carefully, along with providing for the burgeoning requirement for freehold premises.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be an essential piece of evidence that is needed in the coming months to better inform the Council of the development land needs of current and future businesses. A variety of forecasting measures can be used to predict the employment land requirement, including using past take up rates and projecting these forward.
E1	115	John	Breese	Rosconn Strategic Land		Option 4 - This approach is in accordance with NPPF paragraph 20-21 which seeks to address the development requirements raised by neighbouring local authorities through strategic policies. As per NPPF paragraphs 80 & 81 the level of economic development should be set out by planning policies which relate to a clear economic vision and strategy detailed in the Local Plan Review.	Noted. The requirements of the NPPF will be adhered to when drafting the Plan Review.
E1	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	Support Option 4 given the context for growth in the District and in areas beyond its boundaries. Would align with housing distribution option 5, which would create opportunities for an appropriate mix of housing and employment development within close proximity to the conurbation.	Support for Option 4 noted, although do not see that there is necessarily a locational alignment between meeting any housing or employment shortfall and the perceived need for this to be on the edge of conurbation.
E1	119	Darren	Oakley	RPS Group	Gleeson	Of the options presented, RPS supports Option 4 (Plan for a level of employment growth that aligns with district-wide needs and also unmet needs arising from neighbouring areas). This would be an appropriate response given the context for growth in the district and in areas beyond its boundaries. This would also align with housing distribution Option 5, which would create opportunities for an appropriate mix of housing and employment development within close proximity to the conurbation, to assist in addressing needs where they arise and promote sustainable patterns of development.	Noted. The responses to Strategic Issue 4 (Broad options for development distribution and allocating land uses) will also need to be considered to ensure there is strategic alignment. However we do not feel that Employment Option 4 only aligns with Broad Development Option 5 (Focus development of the edge of the West Midlands conurbation along our border with Solihull/Birmingham/Dudley) as implied in the response. The employment options only consider the amount of employment land needed, and not the location for this.
E1	124	Robert	Lofthouse	Savills	Taylor Wimpey	We support Option 4.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.

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E1	134	David	Barnes	Star Planning	Richborough Estates	If higher levels of economic growth are to be sought then the housing requirement will need to match these aspirations. It is also likely that there will be employment provision which allows for some of the sub regional need to be satisfied within Bromsgrove District. However, as already noted, some of the future occupiers of housing associated with the needs of Birmingham and the Black Country will rely on the conurbation for work and hence the location of these homes adjacent to the conurbation, such as at Hagley. However, because of their sustainability credentials, such locations need not be exclusively to meet the housing needs of the conurbation.	Noted. The relationship between housing and employment growth will be very important. The unmet employment need from the conurbation is less well publicised and will need to be explored further through the Duty to Cooperate. Do not necessarily see that there is a locational alignment between meeting any housing or employment shortfall and the perceived need for this to be on the edge of conurbation, specifically at Hagley.
E1	161	Ian	Macpherson		Self	Option 4 to try and avoid further travel to work outside the District	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	165	Johanna	Wood			Option 3 with regular reviews as to progress. Unless you plan ambitiously then the strategic objective of attracting new business and employment will never happen. Aim high	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	166	John	Gerner			Option 4	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	176	Mr & Mrs J D	Winslow			Option 4 is preferable – planning for a level of employment growth that aligns with levels of housing growth in the District. Although this may also take into account any demands from other Local Authorities, these could be considered, at least in the short term, as ancillary to the primary aim of focussing on Bromsgrove's needs.	Noted. The relationship between housing and employment growth will be very important. The need for housing to meet Bromsgrove's own needs are primary over the need to accommodate unmet need from other local authorities.
E1	192			Dodford with Grafton Parish Council		Option 4. Extra employment in this district seems unlikely to come from capital development, but there is probably great potential for SMEs and self-employed people.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E1	192			Dodford with Grafton Parish Council		Employment – we need high quality technology companies to provide employment for high earners, to that they will spend in the area.  Would support Option 2 recognising that proximity to the West Midlands conurbation is likely to further encourage commuting from Bromsgrove.	Noted, but whilst there may be a desire to bring high tech companies to the district, we cannot make this happen through the BDP. The Council can deliver sites that are well located and serviced but it will be for individual businesses to decide if they wish to relocate to the district.
E1	194	Darren	Oakley	RPS	Clients	Of the options presented, RPS supports Option 4 (Plan for a level of employment growth that aligns with district-wide needs and also unmet needs arising from neighbouring areas). This would be an appropriate response given the context for growth in the district and in areas beyond its boundaries. This would also align with housing distribution Option 5, which would create opportunities for an appropriate mix of housing and employment development within close proximity to the Conurbation, to assist in addressing needs where they arise and promote sustainable patterns of development.	Noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
<b>Q.E2: Do you have any other comments on the above options?</b>							
E2	2	Gill	Lungley	Barnt Green Parish Council		Geographically, Bromsgrove is on the wrong side of Birmingham to contribute to its manufacturing industry (which is predominantly on the north side of the city). Transport links are slow to both Birmingham and the Black Country. Bromsgrove needs to accept that it is a dormitory commuter town and that its own industry will be small scale, though possibly high tech. The M42 itself has shortcomings, limited access and egress at Junction 1 and is often jammed at busy times, specifically eastbound in mornings from J1 to J3.	The shortcomings of M42 J1 are known and we are working with WCC and HE to improve flows as much as possible given the highly constrained land. Transport links to Birmingham have improved recently with the extension of the Cross City line to Bromsgrove station and its related electrification. This has improved journey times and reliability. Whilst traditionally heavy industry has been located to the north of Birmingham, the employment sector is evolving and Bromsgrove district is well placed on the strategic road network to offer a good location to new businesses. We acknowledge that Bromsgrove could be described by some as a commuter town, with its excess of out commuters, but there are aspirations to reduce the out commuting flow and boost the district's economy.
E2	11	Rosamund	Worrall	Historic England		The Plan will need to consider the interrelationship between the historic environment and housing density through relevant development management policies and appropriate assessment of potential development sites for employment.	Noted. Any new sites for employment will be assessed using the Site Selection methodology which considers impact on historic assets and their setting.

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E2	20	P	Harrison	Wythall Parish Council		The current high level of commuting to work in an adjoining urban area is not sustainable. Journey times are increasing due to traffic congestion, the cost of fuel and transport are increasing, and younger people cannot afford to travel long distances to work.	Noted. We will continue to work with WCC, Highways England and transport providers to look to reduce congestion, improve journey times and other sustainable alternatives. From the employment side, we are looking at ways to boost the District's economy and thus reduce the need to commute to other areas for work.
E2	28	Emily	Barker	Worcestershire County Council		Young people need opportunities at both 16 and 18 to enter into employment. Employment growth and opportunities will be required to sustain training and development and key skills through the delivery of apprenticeships .	Noted. Apprenticeships and Vocational Training are not something that can be directly delivered through the planning system. However, we will consider the appropriateness of a policy seeking contributions towards training initiatives for local people to allow them to access jobs in employment areas delivered through the plan.
E2	29	Daniel	Atiyah	Wyre Forest District Council		The consultation document comments that Bromsgrove currently has a lack of space available for business expansion, and there is a smaller supply of larger units in relation to manufacturing and distribution businesses. By offering high quality employment this could assist in reducing the discrepancy in earnings for Bromsgrove residents to Bromsgrove employees. Wyre Forest will continue to engage with Bromsgrove through the North Worcestershire Economic Development and Regeneration partnership.	BDC welcomes Wyre Forest DC's commitment to engagement.
E2	34	Sue	Baxter			No	-
E2	42			Wythall Residents Association		The current high level of commuting to work in an adjoining urban area is not sustainable. Journey times are increasing due to traffic congestion, the cost of fuel and transport are increasing, and younger people cannot afford to travel long distances to work.	Noted. We will continue to work with WCC, Highways England and transport providers to look to reduce congestion, improve journey times and other sustainable alternatives. From the employment side, we are looking at ways to boost the District's economy and thus reduce the need to commute to other areas for work.
E2	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	NO	-
E2	56	Peter	Chambers	David Lock Associates	Birmingham Property Services	We do not make any specific responses to QE1-4, other than to make the point that any spatial strategy for growth within the District should consider whether its objective is for less, or better travel between homes and jobs, and depending on the outcome, land for employment close to (or as part of) new development sites or locations should support whichever objective is selected or prioritised.	Noted. Until the spatial strategy emerges through further evidence, the balance between reducing out commuting and improving journey times/offering sustainable modes is not known. However it is likely to be a combination of initiatives as it is implausible to stop all out commuting.
E2	72	Stephen	Peters			The current high level of commuting to work in an adjoining urban area is not sustainable. Journey times are increasing due to traffic congestion, the cost of fuel and transport are increasing, and younger people cannot afford to travel long distances to work.	Noted. We will continue to work with WCC, Highways England and transport providers to look to reduce congestion, improve journey times and other sustainable alternatives. From the employment side, we are looking at ways to boost the District's economy and thus reduce the need to commute to other areas for work.
E2	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	The difficulty with predicting the requirement for employment land is that there is no official 'rolling supply' requirement (as per the now abolished Regional Spatial Strategy for the West Midlands). In order to reverse the level of out-commuting, new development opportunities to accommodate micro, small and medium sized enterprises within the District need to be considered carefully, along with providing for the burgeoning requirement for freehold premises.  In respect of potential options, we would like to see a multi-faceted approach, looking at new designations around the District, including mixed-use sites.	Noted. An Employment Land Review will be an essential piece of evidence that is needed in the coming months to better inform the Council of the development land needs of current and future businesses. A variety of forecasting measures can be used to predict the employment land requirement, including using past take up rates and projecting these forward.
E2	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of E1 and E2, the difficulty with predicting the requirement for employment land is that there is no official 'rolling supply' requirement (as per the now abolished Regional Spatial Strategy for the West Midlands). In order to reverse the level of out-commuting, new development opportunities to accommodate micro, small and medium sized enterprises within the District need to be considered carefully, along with providing for the burgeoning requirement for freehold premises. In respect of potential options, we would like to see a multi-faceted approach, looking at new designations around the District, including mixed-use sites.	Noted. An Employment Land Review will be an essential piece of evidence that is needed in the coming months to better inform the Council of the development land needs of current and future businesses. A variety of forecasting measures can be used to predict the employment land requirement, including using past take up rates and projecting these forward.
E2	151	Dawn	Macqueen			One cannot divorce housing from employment- these policies should underpin the strategy and not define it.	Noted.
E2	161	Ian	Macpherson		Self	Locations close to the motorway and main road junctions could be an advantage.	Noted. Sustainable travel options to these locations will also need to be considered.
E2	179	Neil	Gow	Burcot Garden Centre	Self	We need thinking within the Council to 'join up'. Highways do everything they can through their lack of control of road works to jeopardise the viability of business, while rating officials push business rates higher and higher, yet planners also allow duplication of businesses to expand such that there is over supply and none survive.	It is beyond the role of the planning system to control the exact mix of businesses in the District. Planning policies are limited to specifying a mix of desired use classes, and if differing business types fall within the same use class, the Council cannot act to restrict one business over another if it does not involve a change of use. Business rates are set by central government and are also beyond the control of the Council.



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E2	192			Dodford with Grafton Parish Council		Option 4. Extra employment in this district seems unlikely to come from capital development, but there is probably great potential for SMEs and self-employed people.	Whilst the comments are noted, it would be unrealistic to expect that SMEs and self employed people alone will deliver considerable quantum of employment land.
<b>Q.E3: Which of the following options do you consider is most appropriate and why? [For options see Sep 2018 consultation document, p.38]</b>							
E3	1	Tammy	Williams	Alvechurch Parish Council		The Paragraph below from the consultation paper shows why the options in Q. E3 need to treating the BDC Cabinet economic objectives as at the baseline 6.17. <i>It is important that the Plan Review is based on an understanding of business needs operating within the District and wider region, in order for land allocations to be identified based on qualitative needs as well as solely quantitative evidence.</i> Looking at Q.E3 then Option 1 is plainly too timid if Bromsgrove is to accept the challenge of being a district having a significant and growing business sector that contributes well to the wider west Midlands economy. Accordingly options 2, 3 and 4 are the ones to use in land assessment and site selection.	Comments noted. An Employment Land Review will look at the qualitative needs of existing (and potential new) businesses in Bromsgrove through survey work. Higher level Employment Needs Assessment work will consider the quantum of employment land needed and this will determine the feasibility of Option 1, which can only yield a limited amount of opportunities.
E3	1	Tammy	Williams	Alvechurch Parish Council		Option 3: could address across the district shortfalls.... Option 4 is partly redundant for the District and would not be required to do this now that Redditch Borough have just agreed planning permission for a large area of land a potential 75-acre (30 hectares) site east of Redditch at the junction of the A4023 and A435 and close to Ravensbank Business Park, <i>Option 4: Allocate new employment land for approximately 25 hectare sites to meet the needs of medium and larger sized firms as part of mixed use strategic allocations, where large scale housing allocations are proposed in the Plan review. This could include wider employment generating uses as well as more traditional B use employment development</i>	The Ravensbank site at Redditch Eastern Gateway was allocated in the adopted BDP and meets the needs of the Redditch for the period to 2030. The plan review looks beyond this timeframe and so further employment land will need to be allocated to meet future needs.
E3	2	Gill	Lungley	Barnt Green Parish Council		Option 1 – meet employment need as far as possible on existing sites unless there is evidence of specific need for more sites.	Noted.
E3	4	Barry	Spence	Bentley Pouncefoot Parish Council		We suggest a combination of Options 2 and 3	Noted.
E3	5	Kevin	Joyes	Beoley Parish Council		Best option is a combination of Options 1 and 2 rather than building new standalone commercial developments. District Council should continue rural enterprise by supporting sympathetic conversion of existing properties and limited infill opportunities, rather than allowing new larger employment sites in rural communities.	Comments noted. Rural enterprise will continue to be supported within settlements and where very special circumstances can be demonstrated in Green Belt settings. The Employment Needs Assessment and more detailed Employment Land Review will help to determine the size and location of sites required in the future.
E3	9	Alexandra	Burke	Hagley Parish Council		1.Intensification should certainly be encouraged, but unlikely to provide a realistic solution. 2. Unlikely to be any obvious sites for this 3. Dual carriageways leading from M42 J2 and J3 meaning that proximity to motorway junctions need not be important. 4. BDC should not consider allocating large sites until those larger employment sites in neighbouring areas are taken up. It may be appropriate to retain the option of making a future allocation of some safeguarded land for employment uses in 10 years time when releases have to be considered.	Comments on the four options noted. Re. Option 2. There could be scope to expand some existing employment areas in south Bromsgrove into the Green Belt. Re. Option 3, whilst the existence of the dual carriageways from the motorway offer good links to existing development areas, these areas do not offer the gateway/high profile sites sought by some operators. Re. Option 4, unfortunately since the abolition of Regional Spatial Strategies, there is no formal mechanism to consider employment land needs in the wider region and the apportionment of need to different Local Authority areas. Strategic matters with neighbouring authorities will be progressed through the Duty to Cooperate.

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E3	10	Patricia	Dray	Highways England		<p>Option 1: Until the final need is known is difficult to make informed comment on matters relating to the SRN, however, we note that all options will have impacts on the SRN.</p> <p>Option 2: Until the final need is known is difficult to make informed comment on matters relating to the SRN, however, we note that all options will have impacts on the SRN.</p> <p>Option 3: Until the final need is known is difficult to make informed comment on matters relating to the SRN, however, we note that all options will have impacts on the SRN. Following the same general principles we outlined for our consideration of housing sites we would recommend that concentration of employment development is a sensible policy choice to make which will allow management of traffic impact, especially HGVs easier by providing a critical mass of development in locations away from sensitive areas.</p> <p>We would note that use of land directly adjacent to motorway junctions whilst attractive from a commercial perspective could adversely impact on the delivery of SRN junction improvements required to cater for the planned housing growth. To this end a holistic transport assessment of the emerging Plan is required to allow consideration of land boundary issues on development sites adjacent to SRN junctions.</p> <p>Option 4: Until the final need is known is difficult to make informed comment on matters relating to the SRN, however, we note that all options will have impacts on the SRN. We concur that promoting mixed use development is an effective policy choice to reduce traffic impacts if carefully planned and the level of internalisation of trips can be achieved. Again we note our response to the housing issues that indicates a critical mass of development can provide effective mitigation of SRN traffic impacts. Due to the differing nature and most likely different promoters for each use within a mixed-use site we would strongly recommend that a site master planning exercise is made a policy requirement if such a direction is chosen. We would also expect that suitable strategies for managing the provision of transport mitigation and developer contributions would form an outcome from the master planning exercise and be consistent with plan policies in these areas.</p>	Comments noted. A Strategic Transport Assessment is a key piece of evidence that will be needed to inform the plan prior to the Preferred Options stage. More detailed Transport Assessments will be required when sites to be allocated are being finalised. With regard to Option 3, the potential need to safeguard land for future SRN junction improvements will be considered if and when sites close to motorways are being worked up for allocation. With regard to Option 4, should large mixed use allocations be promoted, these points will be picked up at a later stage when policies are being drafted.
E3	20	P	Harrison	Wythall Parish Council		<p>Option 3 – consideration needs to be given to designating existing non-conforming large-scale employment sites in the Greenbelt as areas for future employment growth. E.g. Oakland International at Beoley, Becketts out-of-town shopping complex at Wythall. This would align the planning policies with the political aspirations of the Council and permit better planned development with a higher quality of design.</p> <p>The designated employment land at Wythall Green should be exploited to its maximum potential and better land use encouraged.</p> <p>Motorway junctions offer scope for distribution and storage uses and have immediate access to the national road system.</p> <p>Oakland International is a site of national importance for food distribution but is currently in the Greenbelt and thus prevented from expanding. Further development at this location would provide much-needed jobs but should be considered in conjunction with a dedicated new road linking direct to the A435 and the motorway network.</p>	Comments noted. Re. Option 3 and Oakland International - The case for recognising existing employment sites within the Green Belt will be considered at a later stage in the plan making process, however the current mix of retail uses at Beckett's Farm, Wythall does not constitute an employment site. Wythall Green already benefits from unimplemented planning permissions which would enable the site owners to expand the employment offer if desired. The potential for motorway junctions was noted in the consultation document but evidence on the best mix of employment uses for the District will need to be gathered before it can be concluded that these are the right locations for employment land.
E3	22	Carl	Mellor	Black Country Authorities		Option 3 - Allocate new freestanding employment sites in sustainable and accessible locations including transport corridors and motorway junctions in order to provide larger employment sites would help to meet potential shortfalls in the Black Country (particularly larger sites) as outlined in the answer to Q. SI 5.	Noted. The District Council will continue to engage with neighbouring local authorities through the duty to cooperate on a range of matters including employment needs. Further evidence on employment needs will be collected to inform the plan review and sites will be assessed using the site selection process to inform the scale and location of site allocations.
E3	27			Stratford On Avon District Council		All options (particularly Options 2, 3 and 4) could potentially have significant cross-boundary implications if locations along the A435 were to be subsequently identified. SDC would expect to be involved with discussions at the earliest opportunity. SDC also re-emphasises the constraint of the A435 through Mappleborough Green and Studley (including the Studley Air Quality Management Area) to the south of Bromsgrove District which would likely be implicated by any proposals for additional significant development along the A435 corridor within Bromsgrove District itself.	Noted. The District Council will continue to engage with neighbouring local authorities through the duty to cooperate on a range of matters including employment needs and transport. Further evidence on employment needs will be collected to inform the plan review before the quantum of land to be allocated is known. A Strategic Transport Assessment will also be necessary to consider the impact of development on routes across the district.

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E3	32	Robert	Spittle	Bromsgrove Economic Theme Group		<p>Option 2, 3 and 4</p> <p>The allocation of new freestanding employment sites in sustainable locations has to be the preferred option (3), fundamentally because this achieves a number of objectives including the satisfaction of the electorate, a compromising position with regards impact on green belt and continuing to support primary and secondary business growth.</p> <p>Clearly however Option 2 should not be ignored ensuring sites such as the Enterprise Park and Buntsford Hill achieve their full potential.</p> <p>Option 4 whilst a consideration needs to be carefully analysed as to potential job creation, and should only be allocated to significant job creating opportunities. In terms of sites this would only be practical at junction 2 of the M42.</p>	Noted, although it should be recognised that Option 3 would require Green Belt land to be used. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E3	34	Sue	Baxter			Option 3 - Take advantage of and extend existing arterial road system	Noted.
E3	42			Wythall Residents Association		<p>Option 3 – consideration needs to be given to designating existing non-conforming large-scale employment sites in the green belt as areas for future employment growth. E.g. Oakland International/Becketts. This would align the planning policies with the political aspirations of the Council and permit better planned development with a higher quality of design.</p> <p>The designated employment land at Wythall Green should be exploited to its maximum potential and better land use encouraged.</p> <p>Oakland International is a site of national importance for food distribution but is currently in the Greenbelt and prevented from expanding. Further development at this location would provide much-needed jobs but should be considered in conjunction with a dedicated new road linking direct to the A435 and the motorway network.</p>	Comments noted. Re. Option 3 and Oakland International - The case for recognising existing employment sites within the Green Belt will be considered at a later stage in the plan making process, however the current mix of retail uses at Beckett's Farm, Wythall does not constitute an employment site. Wythall Green already benefits from unimplemented planning permissions which would enable the site owners to expand the employment offer if desired. The potential for motorway junctions was noted in the consultation document but evidence on the best mix of employment uses for the District will need to be gathered before it can be concluded that these are the right locations for employment land.
E3	47	Michael	Jones	Caddick Land		Employment allocations should be steered towards the most deliverable locations within the District which requires a balanced portfolio of sites to meet Local Regional and National market demand. This will require a mix of Options 3 and 4 although the needs of local businesses should not be overlooked.	Comments noted. Whilst deliverability (and attractiveness to the market) are important factors, the sustainability of sites needs to be at the forefront of the Council's considerations for potential allocations.
E3	49	Debbie	Farrington	Cerda Planning	The Rainbow Partners	No firm conclusions are drawn within the SA -all options make a significant contribution towards SA objective 13 – Economy. Based on the minor positive effects of options 1 and 2 which focus on existing sites may be the most appropriate because these options could help intensify use of existing public transport provision.	Comments noted. The Sustainability Appraisal of the plan will be an important evolving piece of evidence to consider the wider implications of policies and site allocations as they emerge.
E3	58	Karin	Hartley	Delta Planning	Bloor Homes Western & Maximus	<p>We consider that Option 1 will not deliver the step change in economic growth needed to stem the net out-commuting flows as this option does not address the underlying problem of a lack of available employment land and premises in the right locations that are attractive to the market. Options 2 and 4 appear more appropriate to deliver significantly higher economic growth than recent trends, although we are not sure why Options 4 is specific on the size of the employment land (25ha) to be delivered as part of mixed use strategic allocations. With regard to Option 3, we are not entirely convinced that a new, totally freestanding site could be sustainable and would question this as a suitable option for consideration.</p> <p>Clearly a blend of different types of employment sites will be required and the land north of Burcot Lane will help to meet local employment needs for Bromsgrove town with a focus on smaller sized units including business space and light industrial uses.</p>	Comments noted. The 25ha figure within Option 4 was a recommendation taken from the 2018 PBA report 'Bromsgrove's Local Economic Future'. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses. With regard to land north of Burcot Lane, specific site suggestions can be submitted to the Council for consideration through the formal Call for Sites process.
E3	59	Karin	Hartley	Delta Planning	Maximus	<p>Option 1 will not deliver the step change in economic growth needed to stem the net out-commuting flows as this option does not address the underlying problem of a lack of available employment land and premises in the right locations that are attractive to the market.</p> <p>Options 2 and 4 appear more appropriate to deliver significantly higher economic growth than recent trends, although we are not sure why Options 4 is specific on the size of the employment land (25ha) to be delivered as part of mixed use strategic allocations.</p> <p>Option 3, we are not entirely convinced that a new, totally freestanding site could be sustainable and would question this as a suitable option for consideration.</p>	Comments noted. The 25ha figure within Option 4 was a recommendation taken from the 2018 PBA report 'Bromsgrove's Local Economic Future'. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E3	67	Robert	Davies	Gerald Eve	Client	<p>It is considered that land close to strategic motorway junctions in particular lend themselves to the provision of logistics uses and could come forward without significant infrastructure improvements beyond those required in the immediate locality of proposals themselves.</p> <p>Logistics requirements over the life of the Plan are likely to be similar in locational requirements to those that exist today. As such, the best access to the strategic road network and motorway network will remain a prime consideration for those uses.</p>	Comments noted. It is apparent that well connected locations close to motorway junctions are attractive to logistics and distribution uses. However, the range of employment land needed across the sectors will need to be evidenced to ensure the economy is balanced and is not dominated by one sector. An Employment Needs Assessment and Employment Land Review will be important in this regard.

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E3	72	Stephen	Peters			<p>Option 3 – consideration needs to be given to designating existing non-conforming large-scale employment sites in the Greenbelt as areas for future employment growth. E.g. Oakland International at Beoley, Becketts out-of-town shopping complex at Wythall. This would align the planning policies with the political aspirations of the Council and permit better planned development with a higher quality of design.</p> <p>The designated employment land at Wythall Green should be exploited to its maximum potential and better land use encouraged.</p> <p>Motorway junctions offer scope for distribution and storage uses and have immediate access to the national road system.</p> <p>Oakland International is a site of national importance for food distribution but is currently in the Greenbelt and thus prevented from expanding. Further development at this location would provide much-needed jobs but should be considered in conjunction with a dedicated new road linking direct to the A435 and the motorway network.</p>	Comments noted. Re. Option 3 and Oakland International - The case for recognising existing employment sites within the Green Belt will be considered at a later stage in the plan making process, however the current mix of retail uses at Beckett's Farm, Wythall does not constitute an employment site. Wythall Green already benefits from unimplemented planning permissions which would enable the site owners to expand the employment offer if desired. The potential for motorway junctions was noted in the consultation document but evidence on the best mix of employment uses for the District will need to be gathered before it can be concluded that these are the right locations for employment land.
E3	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	No firm view on the preferred option for the provision of new employment land. However, opportunities for creating new or additional employment facilities would be welcomed where they are located in close proximity to proposed residential allocations.	Comments noted, although it should be recognised that a Preferred Option will emerge later in the plan making process.
E3	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Opportunities for creating new or additional employment facilities would be welcomed where they are located in close proximity to proposed residential allocations.	Comments noted.
E3	92	Andrew	Watt	Maze Planning Solutions	Client	Option 3 should be preferred. Allocating new freestanding employment sites in sustainable locations, including transport corridors and motorway junctions will ensure the District maximises its potential to achieve employment growth. Consideration should be given to co-locating new employment development allocations with provision for new housing development land in mixed use allocations.	Comments noted.
E3	98	Sally	Oldaker			I think Option 1: Meet as much employment need as possible on existing designated sites where intensification opportunities exist (these opportunities may only meet a small proportion of need) – again, because there isn't a lot of room to do more.	Comments noted. The other options would require land currently designated as Green Belt to be used.
E3	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Option 3: to optimise the benefits of the District's relationship to major motorway junctions	Noted.
E3	108	Chris	Quinsee	Q&A Planning Services	Client	The options listed here are not mutually exclusive. Whilst there may be benefit in allocating large sites to meet the needs of medium to large-sized firms, this option alone will not be sufficient to meet the District's diverse employment needs and it will be important to ensure that the future employment land supply in the District is not over-concentrated within a small number of large sites only. Option 2 (expanding existing employment sites) and Option 3 (allocating new freestanding employment sites in sustainable locations including transport corridors and adjacent to motorway junctions) will both have an important role to play in ensuring that the District can deliver a diverse range of employment opportunities in the future which will address the future challenges in the local employment market and its wider implications for a successful local economy.	Noted. Evidence on overall employment need and the type and size of employment land to be provided will be important to inform the plan as it progresses.
E3	113	Gareth	Sibley	RCA Regeneration	CAD Square	In respect of potential options, we would like to see a multi-faceted approach, looking at new designations around the District, including mixed-use sites.	Noted. Evidence on overall employment need and the type and size of employment land to be provided will be important to inform the plan as it progresses.
E3	124	Robert	Lofthouse	Savills	Taylor Wimpey	We support Option 3, recognising that the Perryfields development will deliver 5ha of B1 development. There is the opportunity to deliver more homes as part of the Perryfields development, by removing the employment allocation, making best use of land for housing in a sustainable location.	The 5ha of employment land (office and/or light industry) referred to at Perryfields is part of the strategic site allocation in the current BDP, as site BROM3 in policy BDP5A. It is an important part of this large mixed use site and the Council would not wish to see this element of the allocation lost.
E3	135	Fran	Rowley	Turley	IM Properties	<p>It is important that a range of employment locations and types are identified.</p> <p>At present, opportunities for larger employment sites and locations suitable for manufacturing, storage and distribution are limited. There is a need for new sites in accessible locations.</p> <p>To address this deficiency, the needs of Bromsgrove and neighbouring areas need to be acknowledged and provision made to allocate new sites in sustainable locations.</p> <p>Sites which have good access to strategic transport corridors are likely to be more attractive to the market. Where sites can be demonstrated to be sustainable and deliverable over the plan period, they should be afforded due weight in the SA and site selection process.</p> <p>This approach would be consistent with NPPF para 82.</p>	Comments noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses. Any unmet need from neighbouring areas would need to be raised and addressed through the Duty to Cooperate.
E3	161	Ian	Macpherson		Self	Option 3	Noted.

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E3	165	Johanna	Wood			Options 2 and 3. Supports the objective of growing existing businesses from small to medium . It also allows the option to attract in new businesses. Indeed Option 3 could and should attract medium and larger sized firms.	Comments noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E3	166	John	Gerner			All 4 options are valid. Options 3 and 4 most likely to attract employers able to raise pay levels.	Noted.
E3	176	Mr & Mrs J D	Winslow			Consider it more sustainable, and hence preferable, to site new freestanding employment sites alongside transport corridors and motorway junctions i.e. we support Option 3.	Comments noted. Definitions of sustainability can vary and whilst it may be sustainable (and preferable) for the businesses themselves to be located alongside transport corridors and motorway junctions, the wider sustainability and appropriateness of these sites needs to be considered.
E3	192			Dodford with Grafton Parish Council		Options 1 and 2 seem the most sensible, unless there is an easily identifiable larger plot that could be developed for industry.	Comments noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E3	192			Dodford with Grafton Parish Council		Would support Option 2.	Noted.
<b>Q.E4: Do you have any other comments on the above options?</b>							
E4	1	Tammy	Williams	Alvechurch Parish Council		Meet shortfalls by change of use of redundant LA buildings and yards	There is not an abundance of redundant local authority buildings in the district but a range of potential future uses will be considered when any site is being disposed of.
E4	7	Mark	Davies	Environment Agency		This will need to be informed by the [water/flood risk related] evidence base.	Noted. The suitability of sites will be assessed using the Site Selection Methodology which will included considering flood risk and other water constraints.
E4	10	Patricia	Dray	Highways England		Please see our responses to Question E3 and E4.	-
E4	11	Rosamund	Worrall	Historic England		Any approach will need to consider impact on the historic environment.	Noted. The suitability of sites will be assessed using the Site Selection Methodology which will included considering any impact on historic assets.
E4	20	P	Harrison	Wythall Parish Council		Small starter units are in great demand and need to provide basic toilet and messing facilities to each unit and have supporting services such as food outlets.	Any demand for small starter units will be revealed through the Employment Land Review.
E4	34	Sue	Baxter			Also need small units close to or within settlements as start up units and to support small businesses	Noted. Neighbourhood Plans have the ability to allocate sites so there may be scope for small scale, local needs to be met through this route.
E4	42			Wythall Residents Association		Small starter units are in great demand and need to provide basic toilet and messing facilities to each unit and have supporting services such as food outlets.	Any demand for small starter units will be revealed through the Employment Land Review.
E4	72	Stephen	Peters			Small starter units are in great demand and need to provide basic toilet and messing facilities to each unit and have supporting services such as food outlets.	Any demand for small starter units will be revealed through the Employment Land Review.
E4	78	Sean	Rooney	Harris Lamb	Barratt Homes	Opportunities for creating new or additional employment opportunities would be welcomed where they are located in close proximity to residential allocations.	When allocating sites for development, the suitability of making mixed use allocations will be considered.
E4	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Opportunities for creating new or additional employment facilities would be welcomed where they are located in close proximity to proposed residential allocations.	When allocating sites for development, the suitability of making mixed use allocations will be considered.
E4	134	David	Barnes	Star Planning	Richborough Estates	As with housing allocations, a balanced portfolio of employment allocations should be identified at sustainable locations. Such an approach is the most appropriate to enable the full range of the accommodation needs of business to be met.	The Employment Land Review will consider the spread of employment land and premises, including size and suitability.
<b>Q.E5: Do you think we should pursue a flexible approach to allowing alternative business uses on land designated for traditional employment use? If so, how do we ensure that we retain sufficient land allocations for traditional B use employment?</b>							
E5	1	Tammy	Williams	Alvechurch Parish Council		A flexible approach allowing alternative business uses on land designated for traditional employment use should be pursued if that traditional employment use is no longer viable.....and a suitable time lapse has expired in trying to replace that lost business.	Comments noted. Detailed policy wording and evidence requirements for such a policy will be drafted for Preferred Options stage.
E5	1	Tammy	Williams	Alvechurch Parish Council		Q. E5 refers to the flexible approach to the use of land designated for traditional employment. This will be the necessary position in the light of the changing UK and regional economies with parts not knowable at this time	Comments noted. The potential impact of Brexit and wider changes in the economy will be a necessary consideration of any employment evidence commissioned.
E5	4	Barry	Spence	Bentley Pouncefoot Parish Council		We would consider changes of use from employment might be allowed if the employment use is appropriate to the area, but otherwise they should be resisted.	Comments noted. Detailed site specific matters will ultimately be determined through a planning application but this can be considered when drafting policies for the Preferred Options stage.
E5	9	Alexandra	Burke	Hagley Parish Council		If the intention is that extensions should be permissible where barns have been converted to non-agricultural employment uses, perhaps some expansion might be allowed, provided this doesn't affect the openness of the Green Belt and countryside. If this prefers to the expansion of former egg production facilities in Beoley parish this would not be favoured as these are essentially industrial buildings that don't belong in the countryside.	The intention of this question was to consider the appropriateness of non-B use class uses, which may still employ people a number of people, on employment sites.

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E5	11	Rosamund	Worrall	Historic England		Any approach will need to consider impact on the historic environment.	Comments noted. Detailed considerations such as impact of such proposals on the historic environment will be considered further when drafting policies for the Preferred Options stage.
E5	20	P	Harrison	Wythall Parish Council		Flexibility is the key to future growth and employment.	Noted.
E5	28	Emily	Barker	Worcestershire County Council		Consider the need to accommodate some sui generis waste management development in accordance with the Worcestershire Waste Core Strategy. A lack of available facilities can lead to increased costs for other types of business. Waste management businesses themselves also contribute to local employment. Happy to discuss as part of the Duty to Co-operate.	Noted. As suggested, this matter can be taken forward through the Duty to Cooperate but dependent on the scale of the waste management facilities needed, this might be best tackled through a plan led approach and allocation of sites.
E5	32	Robert	Spittle	Bromsgrove Economic Theme Group		Whilst the town has to meet the needs of its residents there has to be a clear distinction between land designations particularly on new development opportunities. A good example of where a flexible approach has become uncontrolled is Sherwood Road where a disproportionate amount of retail and trade outlets have opened in an historical 'B' employment area. These stores create jobs however they are at the lower end of the pay scale and their continued growth does not support long term economic prosperity.  New allocations of land must have a restriction in terms of the quantity of non-office or industrial uses with the aim of keeping the Bromsgrove Pound in Bromsgrove.	Comments noted. Detailed policy wording and evidence requirements for planning applications will be drafted for Preferred Options stage. The balance will need to be struck in terms of creating a flexible policy which allows our employment areas to respond to economic changes versus maintaining the core employment offer.
E5	34	Sue	Baxter			Must be flexible	Noted.
E5	42			Wythall Residents Association		Flexibility is the key to future growth and employment.	Noted.
E5	72	Stephen	Peters			Flexibility is the key to future growth and employment.	Noted.
E5	98	Sally	Oldaker			Yes – you should always be flexible and assess each case on its merits.	Noted and each case is assessed on its merits through the planning application process.
E5	109	Mike	Fletcher	Ravensbury Ltd	Ramsay Limited	Request for allocated employment site to be re-allocated for the development of a 'Park Homes' type scheme (circa 120 units).	The flexible approach suggested in this question referred to alternative business uses, not housing which would not generate any employment.
E5	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	A flexible approach may need to be taken to long-standing B class employment allocations if take-up has not been strong. However, we would encourage the council to learn from what has been done well and where take up (and occupation rates) are strong.	Comments noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E5	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In response to E5 a flexible approach may need to be taken to long-standing B class employment allocations if take-up has not been strong. However, we would encourage the council to learn from what has been done well and where take up (and occupation rates) are strong.	Comments noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E5	112	Gareth	Sibley	RCA Regeneration	Piper Group	Would like to see a multi-faceted approach, looking at new designations around the District. A flexible approach may need to be taken to long standing B class employment allocations if take up isn't strong.	Comments noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E5	113	Gareth	Sibley	RCA Regeneration	CAD Square	A flexible approach may need to be taken to long-standing B class employment allocations if take-up has not been strong. However, we would encourage the council to learn from what has been done well and where take up (and occupation rates) are strong.	Comments noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses.
E5	161	Ian	Macpherson		Self	Yes - some over-allocation may be required	Comments noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses. This may include a 'buffer' to allow for some flexibility.
E5	165	Johanna	Wood			Definitely pursue a flexible approach but manage the mix of business size so as to fit with strategic objectives and avoid hospitality and retail. Should aim to add variety and employment.  In the long term need to plan for trends /shifts in business employment - will it continue to be focussed on B use employment ?	Comments noted. An Employment Needs Assessment and detailed Employment Land Review will be further pieces of evidence that are needed in the coming months to better inform the Council of the development land needs of current and future businesses. Any detailed policy on this matter will consider the appropriateness of non-B class uses and how to ensure alternatives deliver jobs for the long term.
E5	192			Dodford with Grafton Parish Council		Alternative usage for premises where there is no environmental impact of change (i.e. machinery, large lorries, noise, etc) would seem to be acceptable.	Comments noted. Detailed policies considering the appropriateness of alternative uses will be drafted for Preferred Options stage.
E5	192			Dodford with Grafton Parish Council		Rural Enterprise – this is likely to be controversial, but Option 1 offers a way.	Noted. The Council recognises the importance of flexibility and diversification in rural areas.
<b>Q.E6: Which of the following options do you consider is most appropriate and why? [For options see Sep 2018 consultation document, p.40]</b>							
E6	1	Tammy	Williams	Alvechurch Parish Council		Option 3 sounds the most practical if the market dictates it	Noted.
E6	2	Gill	Lungley	Barnt Green Parish Council		Option 1 – support rural enterprise through supporting diversification, conversion and infill opportunities.	Noted.

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E6	4	Barry	Spence	Bentley Pauncefoot Parish Council		Both options are appropriate: continue to encourage diversification whilst recognising the need not to compromise agricultural production in the future and also consider larger parcel/s in sustainable and desirable (to the intended user) locations.	Noted.
E6	9	Alexandra	Burke	Hagley Parish Council		Option 1 is the least bad, needs to be an overarching test of not damaging the openness of the Green Belt and countryside. The allocation of isolated rural sites, even if well connected and sustainable should not be allowed.	Noted.
E6	10	Patricia	Dray	Highways England		Option 1: We support the general principle of this policy approach subject to the SRN traffic implications being considered.  Option 2: We believe that dispersed development creates traffic implications that in the SRN context may prove challenging to mitigate due to the lack of a critical mass of development. The policy test of 'sustainability' in our view would be key to whether sites of this nature could come forward without adverse SRN traffic impacts. The plan development process would need to consider the cumulative effect of such sites on the SRN and develop an appropriate mitigation strategy.  Option 3: Please see our comments on Options 1 and 2 above.	Any potential impacts on the strategic road network would be analysed through a Transport Assessment which will accompany the plan. However it is not envisaged that Option 1 would generate large scale employment opportunities as it is focused on existing activities. The sustainability of any larger allocations in rural areas would be paramount.
E6	20	P	Harrison	Wythall Parish Council		Option 3 – a mix of the options is to be encouraged.	Noted.
E6	32	Robert	Spittle	Bromsgrove Economic Theme Group		The EDTG takes a pragmatic approach to rural development and the Green Belt, whilst undoubtedly in the duration of the plan we will need to develop in such areas, true rural development will ultimately be challenging for the electorate but also in the development of transport infrastructure given there are greater needs for investment in more urban areas. Again, controlled rural development should be considered where standards for diversification and sustainability are met. A suggestion is to widen the employment opportunities around existing rural businesses such as garden centres or similar retail or light industrial sites. (E.g. Becketts Farm)  Attractiveness to the market not necessary a standard and needs definition, as in the context of land value this could lead to an unsustainable increase in values for the wider economy.	Comments regarding the investment needed in transport infrastructure to support rural employment areas are valid and are noted. A Transport Assessment will accompany the plan which will consider the impact of any proposed allocations on the highway network and any mitigatory measures which are needed. Comments also noted regarding attractiveness to the market and that this can be interpreted differently by others, although in the context of an Employment Land Review, this would be considered in a uniform way.
E6	34	Sue	Baxter			Option 3	Noted.
E6	42			Wythall Residents Association		Option 3 – a mix of the options is to be encouraged	Noted.
E6	47	Michael	Jones	Caddick Land		Option 3. The rural parts of Bromsgrove that are well located for access to the strategic highway network and railway connections, are locations where larger parcels of employment land can be located subject to protecting environmental considerations. In addition small scale employment development should be encouraged through the types of development listed in Option 1.	Comments noted, although it should be noted that larger parcels of employment land will involve the loss of designated Green Belt so it will not be possible to protect all environmental considerations in this regard.
E6	72	Stephen	Peters			Option 3 – a mix of the options is to be encouraged.	Noted.
E6	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Option 3 – some rural areas would benefit from employment allocations in settlements where there are some existing facilities already present, for example, including a shop and pub.	Noted.
E6	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	We agree with E6 Option 3 – some rural areas would benefit from employment allocations in settlements where there are some existing facilities already present, for example, including a shop and pub	Noted.
E6	112	Gareth	Sibley	RCA Regeneration	Piper Group	Agree with Option 3	Noted.
E6	113	Gareth	Sibley	RCA Regeneration	CAD Square	We agree with E6 Option 3 – some rural areas would benefit from employment allocations in settlements where there are some existing facilities already present, for example, including a shop and pub.	Noted.
E6	161	Ian	Macpherson		Self	Option 1. Employment uses often need supporting infrastructure so little point in trying to set up new sites on their own.	Noted.
E6	165	Johanna	Wood			Option 3 It will be necessary to follow both options if the long term objectives relating to business growth and therefore employment are to be met.	Noted.
E6	180	Nicholas	Rands			I consider Option 1 to be most appropriate - Encourage rural enterprise, through supporting diversification, conversion and infill opportunities. This will allow the rural communities to become more vibrant and allow rural folk to remain in the rural community if they so wish.	Noted.
E6	192			Dodford with Grafton Parish Council		Option 3	Noted.
<b>Q.E7: Do you have any other comments on the above options?</b>							
E7	2	Gill	Lungley	Barnt Green Parish Council		The case has not been made that there is a demand for anything other than encouraging enterprise (option 1 in E 6). Taking sites out of Green Belt without a pre-identified need is not considered acceptable and appears to be contrary to the Green Belt purposes.	Noted. The amount of employment land required and thus the amount of land to be removed from the Green Belt will be determined through an Employment Needs Assessment and Employment Land Review.



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E7	11	Rosamund	Worrall	Historic England		Options for rural employment opportunities will need to be determined through suitable site assessment in respect of the historic environment as part of the Plan process. The Plan may need to consider whether it is appropriate to include a specific development management policy in respect of rural employment proposals, or whether this could be managed through general employment policies and historic environment policies.	Any sites to be allocated would emerge through the Site Selection process where policy constraints and considerations for each site would be considered and given a RAG rating.
E7	20	P	Harrison	Wythall Parish Council		No	Noted.
E7	34	Sue	Baxter			No	Noted.
E7	42			Wythall Residents Association		No	Noted.
E7	72	Stephen	Peters			No	Noted.
E7	161	Ian	Macpherson		Self	No	Noted.
E7	165	Johanna	Wood			When considering Option 2 focus must be on extending out from existing urban areas and not on simply establishing a new business park or such like in the middle of the green belt.	Noted. However sustainable locations which are attractive to the market may mean those areas which are close to key transport routes and junctions.
<b>Q.E8: Is there anywhere in the District that would particularly benefit from upgraded telecommunications infrastructure? If so, where?</b>							
E8	1	Tammy	Williams	Alvechurch Parish Council		All of the District is in need of upgrading as many people also use their homes as an extension to their work place.	Noted. An Infrastructure Delivery Plan will be needed to support the Plan Review and this will consider current levels of provision and identify areas of deficiency.
E8	4	Barry	Spence	Bentley Pouncefoot Parish Council		Several areas of our own and adjoining parishes are currently negotiating with Worcestershire County Council to secure Superfast Broadband. At present many of our residents experience broadband speeds of under 2Mbps. Any assistance in improving broadband speed would be assistance to local businesses (and residents).	Noted. An Infrastructure Delivery Plan will be needed to support the Plan Review and this will consider current levels of provision and identify areas of deficiency.
E8	9	Alexandra	Burke	Hagley Parish Council		Broadband is clearly a factor that must be taken into account in determining where location is good for a sustainable business.	Noted.
E8	20	P	Harrison	Wythall Parish Council		There are parts of Wythall without adequate broadband connections.	Noted. An Infrastructure Delivery Plan will be needed to support the Plan Review and this will consider current levels of provision and identify areas of deficiency.
E8	27			Stratford On Avon District Council		The lack of broadband in many parts of Stratford-on-Avon is a major concern and whilst SDC is actively working to deliver solutions, it would welcome the opportunity to work with BDC, as appropriate, to deliver further enhancements for the benefit of residents and businesses of both Districts.	Noted.
E8	34	Sue	Baxter			All rural areas that do need to meet minimum standards	Noted. An Infrastructure Delivery Plan will be needed to support the Plan Review and this will consider current levels of provision and identify areas of deficiency.
E8	42			Wythall Residents Association		There are parts of Wythall without adequate broadband connections	Noted. An Infrastructure Delivery Plan will be needed to support the Plan Review and this will consider current levels of provision and identify areas of deficiency.
E8	72	Stephen	Peters			There are parts of Wythall without adequate broadband connections.	Noted. An Infrastructure Delivery Plan will be needed to support the Plan Review and this will consider current levels of provision and identify areas of deficiency.
E8	148	Christine	Thomas		Self	The digital infrastructure is poor and needs strengthening for a larger population.	Noted. An Infrastructure Delivery Plan will be needed to support the Plan Review and this will consider current levels of provision and identify areas of deficiency.
E8	161	Ian	Macpherson		Self	High speed broadband required throughout the District to assist home-working and avoid more travel to work.	Noted. An Infrastructure Delivery Plan will be needed to support the Plan Review and this will consider current levels of provision and identify areas of deficiency.
E8	165	Johanna	Wood			This is particularly pertinent to local businesses. Need to focus on cable as the best option for everyone in the long term .	Noted.
E8	180	Nicholas	Rands			Yes, I would think anywhere in a rural location, specifically Lower Bentley.	Noted. An Infrastructure Delivery Plan will be needed to support the Plan Review and this will consider current levels of provision and identify areas of deficiency.
E8	192			Dodford with Grafton Parish Council		the idea of high earning home working depends on offering newcomers pleasant housing and work environments, with quick and efficient access to the infrastructure needed for them to function: fast internet, good roads and other transport links, close shops and leisure facilities; of these fast internet is probably the most important.	Noted.
<b>Q.E9: Do you think there are any employment issues that we have missed? If so, please tell us what they are</b>							
E9	1	Tammy	Williams	Alvechurch Parish Council		Considering the value of the landscape and of assets such as the Lickey Hills, the Worcester Birmingham Canal and the SSSIs of Bittell Reservoir, Hewell Lake, Local Wildlife Sites etc. ....surely leisure pursuits and sporting business should get a mention in this business section.	Noted, however these type of uses are not classed as employment uses (traditionally use classes B1, B2 and B8) and do not generate much employment compared to traditional office and industrial operations.



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E9	4	Barry	Spence	Bentley Pauncefoot Parish Council		Could consideration be given to cross-boundary cooperation with Wychavon to allocate employment land close to Junction 6 of the M5? This would provide good accessibility to the motorway network and the A38 and be close to Bromsgrove town.	Noted. Strategic discussions with neighbouring authorities will occur in due course as part of the Duty to Cooperate. Any land suggested for development in this area will be considered using through the Site Selection process.
E9	20	P	Harrison	Wythall Parish Council		The increasing trend towards working from home via the Internet.	Noted.
E9	34	Sue	Baxter			Homeworkers - need for adequate broadband	Noted.
E9	42			Wythall Residents Association		The increasing trend towards working from home via the Internet.	Noted.
E9	72	Stephen	Peters			The increasing trend towards working from home via the Internet.	Noted.
E9	151	Dawn	Macqueen			Note vacant units in the Bromsgrove district 10.3%. This is likely to further decline and so would it make sense to convert some of these residential property?	The Town Centre uses of Shops (A1 use), Banks (A2 use), Hot Food Takeaways (A5) and some Sui Generis uses up to 150sqm in floorspace can change use to residential (C3 use) without planning permission, subject to Prior Approval.
E9	161	Ian	Macpherson		Self	No	-
E9	165	Johanna	Wood			Does the lack of apprenticeships / vocational training come under Employment Issues in the District Plan?	Apprenticeships and Vocational Training are not something that can be directly delivered through the planning system. However, we will consider the appropriateness of a policy seeking contributions towards training initiatives for local people to allow them to access jobs in employment areas delivered through the plan.
E9	195	D R	Clarke			Alongside the new developments there should be opportunities for industry and employment.	Agreed. The Council will endeavour to deliver a balance of housing and employment uses.
<b>Q.T1: Are there any parts of the District's road network you think are a priority for addressing in terms of congestion issues? If so, where are these located?</b>							
T1	1	Tammy	Williams	Alvechurch Parish Council		Across the District the A38 around Bromsgrove needs significant improvement to reduce congestion and ease travel to work, from north Worcestershire to Birmingham and the Black Country The A441 through Hopwood and Bordesley is also subject to peak-time congestion in both directions, with the single carriageway stretch down Hopwood hill being overloaded and encourages vehicles to speed through the residential area of Hopwood. The road was never engineered for the volume and speeds of current traffic, especially LGVs travelling from south Birmingham to the motorway network of the M42 at Junction 2 and vice versa.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area. In respect of congestion, a strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	2	Gill	Lungley	Barnt Green Parish Council		Yes. Bromsgrove western by-pass, A38 and A441 improvements are priorities.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T1	4	Barry	Spence	Bentley Pauncefoot Parish Council		The A38 and its main junctions around Bromsgrove should be prioritised with regard to solving congestion issues.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T1	6	Rebekah	Powell	Catshill and North Marlbrook Parish Council		Evidenced in the recent consultation exercises carried out by the Neighbourhood Plan Steering Group that there is a concern in respect of volume and speed of traffic on the road network within the parish.	Noted. The District Council will continue to work closely with Parish Councils, both within designated neighbourhood areas and elsewhere in the District, as the District Plan Review progresses.
T1	10	Patricia	Dray	Highways England		Highways England previously modelled part of this area as part of a study of the long-term strategic traffic implications and requirements of growth in Worcestershire and Birmingham. The modelling work was completed using VISSIM (version v9 – 04) and incorporated all future scenarios into a single geographic area model, in order to ensure maximum consistency between all the scenarios. The future year analysis includes applicable background growth committed developments, and committed schemes. The model covers the motorway network from M5 junction 5 to M5 junction 4 and from M5 junction 4a to M42 junction 3a.  The results of this analysis showed that the SRN junctions showing significant issues between 2023-2030 are M42 Junction 1, M42 Junction 2 and M5 Junction 4.	Noted. Evidence that can be shared on the performance of the SRN is welcomed and may be a useful input to the District Council's strategic transport assessment to inform the scale and location of development proposals.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
T1	20	P	Harrison	Wythall Parish Council		<p>The A.38 corridor through Bromsgrove. This is a major motorway diversion route and improvements at junctions and traffic management have been neglected ever since the M5 and M42 were built. The M42 J1 roundabout is a heavily used intersection and requires radical reconfiguration.</p> <p>The A491 between the M5 J4 and Stoneybridge urgently requires upgrading to dual carriageway. The remainder of the A491 was constructed as a dual-carriageway but is restricted at several points. This is a waste of a road asset and leads to congestion at peak times. The A491 dual carriageway should be returned to its original design capacity throughout its length.</p> <p>The A456 at Hagley is also in need of better traffic management and a by-pass.</p> <p>The A435 at M42 J3 is heavily congested in both directions at peak times and the J3 roundabout is frequently heavily congested.</p> <p>The motorway junction at J4 of the M5 is another heavily congested junction despite recent improvements. Consideration should be given to re-opening the stopped-up original A38 Birmingham Road in a southbound direction to alleviate congestion at the Lydiate Ash junction.</p>	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T1	27			Stratford On Avon District Council		SDC understands Highways England are considering the creation of 'local strategic roads' i.e. roads that are not part of the Strategic Road Network (SRN) but are of greater than local importance. The A435 is a key strategic route within Bromsgrove District and one such road that could be classified as a local strategic road. Any proposals that may affect the A435 need to take full account of impacts outside the District as well as within Bromsgrove District.	Noted. The A435 in this location is included in the major road network. The District Council will continue to engage with neighbouring authorities and other stakeholders on proposals that may have a cross-boundary impact.
T1	28	Emily	Barker	Worcestershire County Council		Outlined priorities in LTP4 to address congestion. Through the Rail Investment Strategy and sustainable transport proposals , outlined plans to facilitate a change to more sustainable transport.	Noted. The District Council will continue to encourage a change to more sustainable modes of transport through the proposals taken forward in the Plan Review.
T1	32	Robert	Spittle	Bromsgrove Economic Theme Group		<p>As stated earlier a priority is for a group of interested parties to agree on tackling transport issues, Highways England must continue to engage with the town as the impact of the M42 in particular plays a key role in the development of District opportunities. Congestion on the M42 between J1 and J3A is at unacceptable levels for commuters in either direction and must be addressed, moreover the M5 serves as a bypass for either end of the town the town and must be accepted as such, with traffic flows being directed to the most appropriate junction, either J4 J5, with the possible reduction of traffic at J1 M42 that creates congestion at the M42/A38 pinch point.</p> <p>The council has to have a policy of controlling works on the network to avoid multiple traffic disruption on key access routes.</p> <p>The A38 issues are widely publicised and particular attention to traffic flows at intersections and the Sherwood Road area must be monitored and addressed. Other areas include; - Access to Stoke Prior Industrial areas Traffic flows and access in Aston Fields</p>	Noted. The District Council work closely with Highways England, who are responsible for operation of the strategic road network, including regular meetings on current and emerging highways issues and the relationship with new development. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T1	33	Steve	Colella	District Councillor		The highways infrastructure across the district is widely regarded as heavily congested and detrimental to ease of commuter and general purpose travel. Some areas experience greater congestion and traffic volumes than others with particular acute problems being experienced along the A456/A491 through Hagley and the A38 through the town. It is accepted that the A456 through Hagley is the busiest A road in Worcestershire and takes a transient route through what is effectively a built up area with a narrow single carriageway in both directions.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	34	Sue	Baxter			<p>The A.38 corridor through Bromsgrove.</p> <p>The A491 between the M5 J4 and Stoneybridge urgently requires upgrading to dual carriageway.</p> <p>The A456 at Hagley is also in need of better traffic management and a by-pass.</p> <p>The A435 at M42 J3 is heavily congested in both directions at peak times and the J3 roundabout is frequently heavily congested.</p> <p>The motorway junction at J4 of the M5 is another heavily congested junction despite recent improvements. Consideration should be given to re-opening the stopped-up original A38 Birmingham Road in a southbound direction to alleviate congestion at the Lydiate Ash junction.</p>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	35	Peter	King	Campaign to Protect Rural England		A38 at Lickey End is severely congested. This either needs to be dualled or bypassed. Detailed suggestions on this are made at Sl.6.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
T1	35	Peter	King	Campaign to Protect Rural England		A456 though Hagley is heavily congested, particularly the section of Worcester Road between Kidderminster Road and Kidderminster Road South. It should improve traffic flows somewhat if this is put back to how it was a few years ago, before money generated by the Cala development was wasted on it.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	35	Peter	King	Campaign to Protect Rural England		A491 between Lydiate Ash (M5 Junction) and Bell End is severely congested, but it should be possible to increase highway capacity by changes largely within the existing carriageway boundaries. This road from the Stoneybridge Island to Bell End was narrowed when traffic lights were provided at Bell End. This can easily be reversed, by removing the new kerbs then installed and relocating a bus stop into an existing layby, which will in any event be a safer location. From Lydiate Ash to the Stoneybridge Island, it was built as a 3-lane road, but subsequently reduced to 2 lanes, when it was decided that 3-lane roads were too dangerous. However the full width remains and the centre lane (protected by double white lines) could be used to increase stacking space. At present this is used to provide ghost lanes to quarries, but little traffic seems to use these. Hagley Parish Council is making more detailed suggestions on this.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	35	Peter	King	Campaign to Protect Rural England		Bromsgrove Western Bypass. This would consist of an improvement of Perryfields and Whitford Roads, with a new road from some point on Fox Lane out beyond the edge of the built up area to join Rock Hill somewhere near the end of Grafton Lane. We understand there has been a feasibility study for this which produced an estimated cost of £80M, making the scheme unaffordable. We would not be able to support any proposal to finance this by allowing development along its route (south of the Whitford site and the present built up area). This would involve Bromsgrove expanding beyond the ridge of Breakback Hill into an area of unspoilt countryside, affecting the setting of the listed Grafton Manor. Development in that area would be unacceptable.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	36	Conrad	Palmer	Fairfield Village community Association		Fairfield is located on the Stourbridge Road, an arterial road between North Bromsgrove and Birmingham and the Black Country. Recent traffic survey (July 2018) recorded approximately 7000 vehicles a day transiting through the village with an 85th percentile of over 39 mph. With no alternative diversion route for local traffic, the village suffer heavy congestions during the school rush and on football match days. The road also sees increased traffic whenever there is an incident on the M5 or A38.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	39	Andrew	Carter	Homes England		The greatest road infrastructure challenge from the primary settlement and therefore for future housing and employment growth is the A38 and the junction with the M42. Junction 1 not being an all movements motorway junction further constrains Bromsgrove and its northern interface with the West Midlands conurbation. To overcome this it is felt that a range of options need to be assessed based on future growth scenarios. Options could range from in highway land improvements to significant interventions which require additional land and solve the current congestion challenge, but also plan for and accommodate future population growth.  Homes England would welcome the opportunity to work with the local authority, County Highways and Highway England to explore a range of options alongside the evolution of the emerging Local Plan.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction, including specific proposals to improve the operation of M42 J1. This scheme is being led by Worcestershire County Council as the highways authority for the area in partnership with Highways England where this impacts the SRN.
T1	42			Wythall Residents Association		The A435 at M42 J3 is heavily congested in both directions at peak times and the J3 roundabout is frequently heavily congested.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	70	Susan	Forrest			The A38 is frequently in gridlock, particularly when there are problems on the motorway. Residents can't move around Bromsgrove.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
T1	72	Stephen	Peters			<p>The A.38 corridor through Bromsgrove. This is a major motorway diversion route and improvements at junctions and traffic management have been neglected ever since the M5 and M42 were built. The M42 J1 roundabout is a heavily used intersection and requires radical reconfiguration.</p> <p>The A491 between the M5 J4 and Stoneybridge urgently requires upgrading to dual carriageway. The remainder of the A491 was constructed as a dual-carriageway but is restricted at several points. This is a waste of a road asset and leads to congestion at peak times. The A491 dual carriageway should be returned to its original design capacity throughout its length.</p> <p>The A456 at Hagley is also in need of better traffic management and a by-pass.</p> <p>The A435 at M42 J3 is heavily congested in both directions at peak times and the J3 roundabout is frequently heavily congested.</p> <p>The motorway junction at J4 of the M5 is another heavily congested junction despite recent improvements. Consideration should be given to re-opening the stopped-up original A38 Birmingham Road in a southbound direction to alleviate congestion at the Lydiate Ash junction.</p>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	98	Sally	Oldaker			<p>Worcester Rd and its junctions with Charford Road, Fox Hill, and Hanover Street. Also the crossroads of Charford Road and the bypass (by KFC – and what a stupid idea it was to put a drive-through restaurant there, causing further congestion!). Also the crossroads of Stourbridge Road and Birmingham Road (not an ideal place for a new Aldi supermarket!).</p>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	<p>We are not aware of any specific priorities but we are familiar with Worcestershire County Council's plans for upgrading key sections of the A38 route, to address congestion hotspots.</p> <p>Further assessment of this route will need to be undertaken to accommodate any forthcoming development schemes at the Bromsgrove Golf Centre or other sites.</p>	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T1	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	<p>The routes with major congestion problems include the A38, the A450 Worcester Road and the A491.</p>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	<p>In respect of T1-T5: clearly, the routes with major congestion problems include the A38, the A450 Worcester Road and the A491.</p> <p>Without a radical overhaul of the main routes into and out of Bromsgrove, the only spatial strategy that could work is one of dispersal of both housing and employment development to settlements in areas where there is generally less congestion.</p>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. It will be important for evidence on transport issues to inform the site selection process as the plan review progresses.
T1	112	Gareth	Sibley	RCA Regeneration	Piper Group	<p>The routes with major congestion problems include the A38, A450 Worcester Road and the A491. Without a radical overhaul of these main routes, the only spatial strategy that could work is one of dispersal.</p> <p>Planned strategic development around Kidderminster will continue to create more commuting.</p> <p>Potentially a new M5 junction somewhere close to the Kidderminster Road - a radical solution alongside the improvement of M42 Junction 1.</p>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. It will be important for evidence on transport issues to inform the site selection process as the plan review progresses.
T1	113	Gareth	Sibley	RCA Regeneration	CAD Square	<p>In respect of T1-T5: clearly, the routes with major congestion problems include the A38, the A450 Worcester Road and the A491. Without a radical overhaul of the main routes into and out of Bromsgrove, the only spatial strategy that could work is one of dispersal of both housing and employment development to settlements in areas where there is generally less congestion.</p>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. It will be important for evidence on transport issues to inform the site selection process as the plan review progresses.
T1	120	Michael	Davies	Savills	Cala Homes	<p>Consider that the A38 Bromsgrove Corridor should be a priority to alleviate traffic congestion as it will improve the connectivity with Birmingham City Centre.</p>	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T1	122	Michael	Davies	Savills	Landowners	<p>We consider that the A38 Bromsgrove Corridor (Stoke Heath to Rubery within Bromsgrove District) should be a priority for BDC in order to alleviate traffic congestion as it will improve the connectivity with Birmingham City Centre.</p>	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T1	124	Robert	Lofthouse	Savills	Taylor Wimpey	<p>Following an extensive transport assessment process, in conjunction with both the Highways Authority and the District Council (and their advisors) the Perryfields development will contribute to relevant highways improvements, as detailed in the current planning application.</p>	Noted.

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T1	143	Anstice	Hughes			The Worcester Road, Bromsgrove, between Fox Lane and the Kidderminster Road should be a priority. Congestion is very bad and as a result air quality is very poor. In addition it is a route used by numbers of school children as there are 3 schools nearby.	Noted. Proposals as part of the Whitford Road and Perryfields Road planning applications will deliver highways schemes in this area to mitigate impacts of development which will improve the current performance of this part of the local highway network.
T1	154	Emily	Palmer			Objection due to already over crowded and gridlocked roads.	Noted.
T1	165	Johanna	Wood			Oakalls /Slideslow Roundabout and linked to this the Bromsgrove By Pass and A38/ New Road junction	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T1	166	John	Gerner			Bromsgrove Town Centre, Worcester Road, Kidderminster Road, Stourbridge Road, Birmingham Road, Rock Hill, Charford Road, Fox Lane, Whitford Road, Broad Street, Meadow Road, Golden Cross Lane.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	184	Nina and Ray	Read			Biggest draw to Bromsgrove from surrounding regions was as a dormitory town, with facilities for family life (High Street, sports and social activities). This is no longer the case. Workers struggle to get in and out of the town, deliver and collect children from school and social activities.	Noted.
T1	188	Peter	Rowbottom			There is huge and unacceptable congestion along the A456 in Hagley, including at its junctions with the A450 Worcester Road, B4187 Worcester Road, and A491 Stourbridge Road. Congestion at the B4187 junction has been made significantly worse by the incompetent decision by Bromsgrove District Council, via its planning committee and planning officers, to approve major changes to that junction as a result of planning application 12/0593 , 175 Cala Homes on Kidderminster Road.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	192			Dodford with Grafton Parish Council		The whole of the Bromsgrove road system is about to implode; the suboptimal A38 development has led to 'rat running' throughout the east of the town, while the lack of a through road on the West is leading to increasing congestion on that side too (not helped by the development if many new dwellings without any apparent infrastructure development). The creation of a western relief road, coupled with the proper completion of the A38 corridor would help, but is unlikely to occur in the short to medium term (if at all). The existing Bromsgrove by pass is inadequate for traffic volumes and the planned improvements seem unlikely to remedy this (given the number of roads crossing it). The best solution would be to construct a new western relief road parallel to and to the east of the M5. There is land available for this, but pressure needs to be exerted at national and county level to promote this solution.	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T1	192			Dodford with Grafton Parish Council		7.15 M5/M42 access always an issue. A38 needs widening and funding from Local and Central Government required.	Noted. As part of the strategic road network, motorway junctions are controlled by Highways England. The District Council will continue to work with Highways England as the plan review progresses. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T1	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		Believe that the A456 through Hagley is close to capacity, those problems extend at peak times onto the A491. Believe that these problems are so serious as to mean that further development in whichever District Authority which would increase traffic in these areas, shouldn't be allowed unless solutions are provided. The impact of these problems is being felt in surrounding villages such as Belbroughton.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
<b>Q.T2: Are there any parts of the road network you think are a priority for addressing in terms of road safety, air quality and pollution, or enabling development sites? If so, where are these located?</b>							
T2	1	Tammy	Williams	Alvechurch Parish Council		In terms of road safety (including pedestrian and cycling safety), the A441 through Hopwood (see also answer to Q.T1) is particularly bad, with no pedestrian crossings, (a need highlighted especially at rush hours), also severely degraded footways and consistently-speeding vehicles. The latter have been monitored by the Safer Roads Partnership for several years under a Community Concern initiative but average vehicle speeds are still above the National Police Chiefs' Council guidelines. This road tends to turn into a racetrack outside of those rush hour periods.	Noted. The District Council have recently been working with WCC Highways department on gathering a strategic transport evidence base (STEB) to inform future transport assessments that will support proposals within the Plan Review. This evidence base includes information on road safety issues such as accident data. Speed limits and enforcement are outside the scope of the Plan Review.

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T2	4	Barry	Spence	Bentley Pauncefoot Parish Council		Some of the minor roads around Stoke Prior are problematic due to the size of vehicle using roads not intended not built for that purpose. Roads such as Westonhall Road and Sharpway Gate are used by heavy goods vehicles (presumably going to and from the employment sites at Stoke Prior). Lanes running through our Parish are used as 'rat-runs' by traffic avoiding using the A448 and B4184. This raises concerns with local residents over road safety generally (due to the speed of traffic) and endangers pedestrians, cyclists and horse-riders as there are few verges or passing places. Copyholt Lane and Banks Green are of particular concern	Noted. Speed limits, vehicle restrictions and enforcement is outside the scope of the Plan Review.
T2	9	Alexandra	Burke	Hagley Parish Council		Air quality is a significant issue on A456 and adjacent roads in Hagley. The AQMA should include the houses fronting to these roads	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAs.
T2	10	Patricia	Dray	Highways England		Highways England's Route Strategy document (updated in 2017) for the London to Scotland route provide a suitable evidence base to outline safety and congestion issues on the SRN. This highlights M42 junctions 1 and 3 and the M5 in the Bromsgrove area as having existing safety and capacity issues. It records the M42 junction 1 has a traffic related AQMA.  In terms of recent network developments and existing plans the following are relevant to the Bromsgrove local plan: 1. M5 Junctions 4a to 6 smart motorway – scheme completed in 2016. 2. M40/M42 interchange (including M42 junction 3) upgrade to smart motorways – planned for completion by 2025. 3. Birmingham Box Phase 4 Upgrading the remainder of the Birmingham box to Smart Motorway standard, with additional capacity and technology on the M5 and M42 on the western and southern sections of the road and supporting upgrades to junctions including the M5/M6 Interchange – scheme under consideration.	Noted. The District Council will continue to engage with Highways England on safety, congestion and air quality related issues on the SRN.
T2	20	P	Harrison	Wythall Parish Council		The A441 through Hopwood requires speed enforcement.  The M42 J1 is heavily congested and the immediate area suffers air pollution.  The town centre of Bromsgrove is also congested and polluted mainly by the need for through traffic to Kidderminster having to pass through the centre of the town.	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAs. Speed limits, vehicle restrictions and enforcement is outside the scope of the Plan Review.
T2	28	Emily	Barker	Worcestershire County Council		Parts of Worcester Road already fall into the AQMA, any developments should avoid adding to the existing levels of air pollution caused by traffic. Currently 25.8% of males and 29.5% of females in Bromsgrove live in areas of high exposure to NO2. Detailed modelling has been undertaken.	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAs.
T2	32	Robert	Spittle	Bromsgrove Economic Theme Group		Stourbridge Road and Broad Street junction needs particular mention as it is dangerous for car users, cycle users and pedestrians accessing retail outlets, visibility is poor due to on road parking and bus stops and road crossers.  Perryfields Road and Kidderminster Road junction needs addressing for all the safety of all transport modes and access to future development in the area.  Access to various residential developments is poor, Rutherford Road, The Oakalls for example creating potential poor air quality issues.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T2	34	Sue	Baxter			The A441 through Hopwood requires speed enforcement. The M42 J1 is heavily congested and the immediate area suffers air pollution. The town centre of Bromsgrove is also congested and polluted mainly by the need for through traffic to Kidderminster having to pass through the centre of the town. the use of average speed limits would help	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAs. Speed limits, vehicle restrictions and enforcement is outside the scope of the Plan Review.
T2	42			Wythall Residents Association		The A441 through Hopwood requires speed enforcement. The M42 J1 is heavily congested and causes air pollution. Bromsgrove Town Centre is congested and polluted mainly because of through traffic to Kidderminster.	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAs. Speed limits, vehicle restrictions and enforcement is outside the scope of the Plan Review.
T2	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	We are not aware of specific priorities but we are familiar with Worcestershire County Council's A38 corridor scheme which includes multi-modal improvements. As part of the promotion of the Bromsgrove Golf Centre development, we have examined opportunities to provide pedestrian and cycle links to town centre and key local amenities including town centre and rail station which would integrate development sustainably with improved access by non-car modes which will present benefits to the wider community. At present the A38 and A448 form a barrier to pedestrian and cyclist accessibility from the Golf Centre, so careful design of suitable crossing facilities will need to be undertaken.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
T2	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Strategic development around the periphery of Bromsgrove will only exacerbate existing problems within the A38 and M5 motorway, as planned strategic development around Kidderminster will continue to create more commuting towards Bromsgrove in order to access the motorway network. Without potentially a new M5 junction somewhere close to the Kidderminster Road, it is unlikely that congestion will be significantly reduced in the longer term. This will be a radical solution, but one that will have to have serious consideration, alongside the improvement of M42 J1.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T2	124	Robert	Lofthouse	Savills	Taylor Wimpey	The Perryfields development will contribute to relevant highways improvements, as detailed in the current planning application. Significant s106 contributions will go towards the pedestrian and cycle network improvement schemes being promoted by the Highways Authority.	Noted
T2	143	Anstice	Hughes			Worcester Road, Bromsgrove, for the reasons I mentioned in response to Q T1: air quality is appalling.  I believe a priority in terms of tackling congestion and the consequent poor air quality should be the Worcester Road/Hanover Street/Market Street/Birmingham Road.  As to road safety issues, I think the location of the pedestrian crossing on Hanover Street needs examining. Could it be moved to halfway down the road, so that schoolchildren are not tempted to cross the road where there is no crossing, but also avoiding moving it too far from the Worcester Street junction so that pedestrians moving to and from the chip shop are also not tempted to cross without a crossing. If it was halfway down the road, just outside the delivery entrance to Waitrose, there would be less temptation to cross at inappropriate points, as well as funnelling all pedestrians together.	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAS.
T2	146	Charlotte	Quirck			Increased traffic in area leading to increase in pollution and noise	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAS.
T2	146	Charlotte	Quirck			Speeding especially on Silver Street and Middle Lane	Noted. Speed limits and enforcement is outside the scope of the Plan Review.
T2	165	Johanna	Wood			Most of the districts road network is unsafe for cyclists especially at rush hour. Wherever development sites are identified the most important consideration is the impact of the increase in traffic to already crowded roads.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T2	166	John	Gerner			Air quality is a concern wherever there is stationary traffic, especially in the Worcester Road AQMA.	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAS.
T2	166	John	Gerner			Safety of cyclists is a major concern on all roads in Bromsgrove urban area with an impact on pedestrians too as many cyclists opt to use footpaths causing undesirable and dangerous conflict between cyclists and pedestrians.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T2	180	Nicholas	Rands			Repair of potholes and poor road surface of the country lanes needs to be improved in order to improve cycling safety. At the moment cyclists avoid riding on poor surfaces and so ride in the middle of the road. These poor surfaces have been produced due to poor repairs in the past, in particular the spray bitumen type of repair. This is not compacted and so within a couple of years creates ridges that cyclists will not ride on. This type of repair is a waste of time and money. PLEASE re-think how you repair roads to give longevity. Please stop excavating grips through the verges of country lanes. These cannot be seen by road users and when one has to pull off the road to pass another vehicle (especially the large agricultural vehicles today) there is a risk of damage to ones vehicle and consequent safety issues, because of driving into a grip. These grips do not serve a useful purpose as the fall and camber on most country lanes means that there will always be puddles after rainfall.	Noted. Highways maintenance is outside the scope of the Plan Review.
T2	188	Peter	Rowbottom			There are major safety issues at the A456 in Hagley, at its junction with the B4187 Worcester Road. This is directly because of the incompetent decision taken by Bromsgrove Council, via its planning committee and planning officers, to approve changes to that junction as a result of planning application 12/0593 175 Cala Homes at Kidderminster Road. There are also regular vehicle accidents, several per year and therefore safety issues at the A456 junction in Hagley with Stakenbridge Lane/Thicknall Lane.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T2	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		High levels of NOx on the A456/A491. Noise is a major issue for residents living along the A456. Hagley has 3 schools. But many parents are unwilling to let their children walk to school due to heavy throughput of commuter traffic at peak times. Speeding is often observed, greater enforcement is required.	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAS.

Q.T3: Do you have any ideas or solutions for addressing the parts of the road network you have identified as requiring action or investment?

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T3	1	Tammy	Williams	Alvechurch Parish Council		The A38 and A441 are strategic routes out of Birmingham to the national motorway network. Their improvement demands significant investment from national Government (as strategic routes) and major investment from the City of Birmingham as a significant proportion of the traffic on those routes is travelling to and from sites within the City, which make a sizeable contribute to regional and national economic growth. Solutions to address this demands the installation of fixed speed cameras, pelican type light operated crossings, village gateway entrances, pinch points, and other engineering features to reduce speed and improve road safety...plus enforcing no right turn junctions.	Noted. These roads now form part of the 'major road network' and may be eligible for future funding sources based on this central government scheme.
T3	4	Barry	Spence	Bentley Pouncefoot Parish Council		Re: minor roads in our Parish we would at the very minimum like to see a reduction in the speed limit. Re: heavy goods vehicles on minor roads - should more restrictions be put in place to divert HGVs onto more suitable roads? Can the Councils seek cooperation from operators of satellite navigation systems to direct traffic away from unsuitable minor roads?	Noted. Speed limits, vehicle restrictions and enforcement is outside the scope of the Plan Review.
T3	10	Patricia	Dray	Highways England		At this stage the issue is to develop a suitable transport evidence base to confirm the detailed transport implications and scope for mitigation of the development option(s) selected.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	20	P	Harrison	Wythall Parish Council		YES.	Noted
T3	32	Robert	Spittle	Bromsgrove Economic Theme Group		On and off-road parking should be reviewed with off road parking on major routes being encourage where practical.	Noted
T3	34	Sue	Baxter			No	Noted
T3	35	Peter	King	Campaign to Protect Rural England		Bromsgrove Western Bypass. This would consist of an improvement of Perryfields and Whitford Roads, with a new road from some point on Fox Lane out beyond the edge of the built up area to join Rock Hill somewhere near the end of Grafton Lane. We understand there has been a feasibility study for this which produced an estimated cost of £80M, making the scheme unaffordable. We would not be able to support any proposal to finance this by allowing development along its route (south of the Whitford site and the present built up area). This would involve Bromsgrove expanding beyond the ridge of Breakback Hill into an area of unspoilt countryside, affecting the setting of the listed Grafton Manor. Development in that area would be unacceptable.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	35	Peter	King	Campaign to Protect Rural England		A456 though Hagley is heavily congested, particularly the section of Worcester Road between Kidderminster Road and Kidderminster Road South. It should improve traffic flows somewhat if this is put back to how it was a few years ago, before money generated by the Cala development was wasted on it.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	35	Peter	King	Campaign to Protect Rural England		A491 between Lydiate Ash (M5 Junction) and Bell End is severely congested, but it should be possible to increase highway capacity by changes largely within the existing carriageway boundaries. This road from the Stoneybridge Island to Bell End was narrowed when traffic lights were provided at Bell End. This can easily be reversed, by removing the new kerbs then installed and relocating a bus stop into an existing layby, which will in any event be a safer location. From Lydiate Ash to the Stoneybridge Island, it was built as a 3-lane road, but subsequently reduced to 2 lanes, when it was decided that 3-lane roads were too dangerous. However the full width remains and the centre lane (protected by double white lines) could be used to increase stacking space. At present this is used to provide ghost lanes to quarries, but little traffic seems to use these. Hagley Parish Council is making more detailed suggestions on this.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	36	Conrad	Palmer	Fairfield Village community Association		Traffic calming engineering works (Road Table) just before the entrance to Fairfield village on Stourbridge Road and another road table outside the village post office.	Noted.
T3	42			Wythall Residents Association		Yes	Noted
T3	70	Susan	Forrest			There should be a dual carriageway or alternative control to ease congestion on the A38	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.
T3	72	Stephen	Peters			Yes	Noted



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
T3	86	Rebecca	Anderson	Iceni Projects	Generator Developments	Worcestershire County Council has acknowledged that the strategic road network to the north of Bromsgrove requires significant levels of funding to deliver projects to ease congestion in this location. They have identified a £10 million shortage in funding for these projects. Our site does not have direct access on to the strategic highways network as requested by Worcestershire County Council to mitigate the impact on the A448, which, along with the A48 has some capacity issues. By focusing on delivering large quantities of housing around Bromsgrove, this can help address the shortfall in funding and other capacity issues in this location through appropriate s106 contributions or CIL funding.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	98	Sally	Oldaker			Yes – build a Western bypass instead of a load of new houses!	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	As per T2, we consider that there are improvements which could be made to enhance existing off-road routes to the town centre and rail station which will be beneficial to any future residents at the Golf Centre site and also provide benefits for the wider local community.  Further analysis of capacity will be undertaken as part of any forthcoming planning application for the Bromsgrove Golf Centre site, and this will determine where improvements may be required to mitigate the impact of that development.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Without a radical overhaul of the main routes into and out of Bromsgrove, the only spatial strategy that could work is one of dispersal of both housing and employment development to settlements in areas where there is generally less congestion.	Noted. Please see responses to representations made on Q.SI10
T3	124	Robert	Lofthouse	Savills	Taylor Wimpey	The Perryfields development will contribute to relevant highways improvements, as detailed in the current planning application.	Noted
T3	143	Anstice	Hughes			What could help would be better bus service in and around Bromsgrove. These should be free for schoolchildren on school days. They can't be encouraged to walk because of the levels of pollution in the air. You can even smell it. I tend to walk through Sanders Park to avoid it. Green Buses could be used - powered by electricity - buses could charge up at out-of-town sites such as the station or Sanders Park. Ideally, development of the A38 is to be encouraged as a way of diverting through traffic away from the town centre. Obviously, if we could get people out of their cars that would help. I believe that a lot of people in Bromsgrove are unaware of the fact that this is an Air Quality Management Area, or what that actually means. I think the first thing the Council needs to do is to make the public aware of this AQMA, what it means in terms of threats to our (and especially our children's) health, and what we can do about it such changing our routes, walking and cycling more, switching off engines instead of idling, and so on. It is also important to make people aware that they are actually breathing in these fumes while sitting in their cars. This would mean a major campaign but the investment would be worth it. The campaign could be called 'Bromsgrove needs to breathe', and notices about it could be placed on all the main roads approaching the town. There are people at Birmingham University studying the effects of urban pollution on pedestrians: contact with them might trigger some ideas and they could provide facts about the damage air pollution can cause. At the same time, and I speak from experience, it is actually unpleasant to walk along any of the main roads in and out of Bromsgrove because of traffic fumes, so this also needs to be tackled. Standing at bus stops is also a pollution hazard. I used to walk into Bromsgrove from the Rock Hill area along the Worcester Road, but now avoid it and walk down side roads and through Sanders Park. Even so, crossing the Worcester Road/Hanover Street, you can't avoid the traffic fumes. Encouraging petrol or electric vehicles and penalising diesel vehicles driving through town should be tackled – hard to do, I know. Making the public aware of footpaths/alleyways and making these safe and pleasant through lighting, CCTV, regular patrols and litter picks would help.	Noted. The District Council will engage with Worcestershire Regulatory Services (WRS) on the proposals within the Plan Review concerning the issue of air quality and the extent of designations of AQMAs.
T3	146	Charlotte	Quirk			Varying speeds from Maypole to Becketts. 30mph throughout this stretch would be an option.	Noted. Speed limits and enforcement is outside the scope of the Plan Review.
T3	165	Johanna	Wood			Oakalls/Slideslow Roundabout : have a new slip road from A38 south to Redditch which diverts traffic to Redditch away from the roundabout. How about an alternative entry to the Oakalls?	Noted. The A38 is currently subject to a major scheme planned to deliver improvement works between M5 J4 and the Hanbury Turn/B4091 junction. This scheme is being led by Worcestershire County Council as the highways authority for the area.

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T3	166	John	Gerner			A new distributor road for the west of Bromsgrove is a pre-requisite for growth and regeneration on this side of the town. Major investment on the A38 will have little impact in the Town Centre and west Bromsgrove without investment that eliminates the need to travel through existing pinch points to reach the A38.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	180	Nicholas	Rands			When repairing the road surface of country lanes use the method of excavate and replace rather than spray bitumen. Fill in all existing grips through the verges and cease excavating any new ones.	Noted. Highways maintenance is outside the scope of the Plan Review.
T3	184	Nina and Ray	Read			Speed checks - drivers put their foot down as soon as they are out of a queue and outlying villages pay the price - Stoke Heath, Fairfield, Stoke Prior, Hanbury etc.	Noted. Speed limits and enforcement is outside the scope of the Plan Review.
T3	184	Nina and Ray	Read			Orbital route and in the meantime measures to encourage traffic flow - not lease lights at Perryfields Road/Kidderminster Rd junction - encouraging drivers to be more courteous - giving way!	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	188	Peter	Rowbottom			The solution to the increased congestion and increased safety issues at the A456 / B4187 junction in Hagley is simple. Reverse the junction back to the way it was before the incompetent decision by Bromsgrove Council to change the junction as part of planning application 12/0593 175 Cala Homes at Kidderminster Road.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T3	192			Dodford with Grafton Parish Council		Walking and cycling – there is a lack of walking and cycle routes in Bromsgrove.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T3	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		WCC have said they will formally consider a Hagley Bypass. The routing of any such proposal would need to be carefully considered.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
<b>Q.T4: Should existing transport issues and future infrastructure requirements be a key factor in where new development is located in the future?</b>							
T4	1	Tammy	Williams	Alvechurch Parish Council		Existing transport issues and future infrastructure requirements should of course be key factors in where new development is located as are other community services like education and medical provision.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	2	Gill	Lungley	Barnt Green Parish Council		Yes. Existing and new infrastructure should be a key factor in siting new development.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	4	Barry	Spence	Bentley Pauncefoot Parish Council		Yes, they should be a factor, but not the over-riding factor.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	8	Nancy	Bailey	Frankley Parish Council		If, however, development is to take place whilst BDC intend to review 60 parcels of land within the area, focus should be on sustainable development around current infrastructure.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	8	Nancy	Bailey	Frankley Parish Council		The electrification of the railways improved commuting to neighbouring areas and key employment sites, i.e.. University of Birmingham, University Hospital Birmingham, Birmingham Women's and Children's Hospital.	Noted.

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T4	8	Nancy	Bailey	Frankley Parish Council		Transport links are key to new housing and encouragement should be giving to using the train more to increase usage from 4%. Free parking at stations should be available.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	9	Alexandra	Burke	Hagley Parish Council		Vital that any employment uses that require the significant movement of goods should be well located in relation to the main road network.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review, including employment uses.
T4	10	Patricia	Dray	Highways England		Yes – Highways England’s policy requires us to engage at the plan making stage to influence the scale and patterns of development so that it is planned in a manner which will not compromise the fulfilment of the primary purpose of the strategic road network. In this context we argue that this is a key material consideration in the development of the plan.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review.
T4	20	P	Harrison	Wythall Parish Council		YES. The urban and rural road network is largely inadequate for modern-day traffic volumes and roads in Wythall require widening, junction improvements, traffic light control at major crossroads and prohibition of heavy vehicles and through traffic where alternative routes exist. E.g. Wythall/Hollywood, Alvechurch.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	27			Stratford On Avon District Council		Such issues should be taken into account including where capacity constraints exist outside Bromsgrove District.	Noted. The District Council will continue to engage with neighbouring local authorities through the duty to cooperate on a range of matters including major transport issues and the location of development allocations.
T4	28	Emily	Barker	Worcestershire County Council		Yes. Will help to reduce deficiencies and enable forward planning. Large scale road building will not in itself address congestion issues. Transport infrastructure requirements should be one of the key factors determining where new development is located, key part of site design should be to minimise requirement to travel by car. District Plan is the key opportunity to help drive this design philosophy.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	32	Robert	Spittle	Bromsgrove Economic Theme Group		Absolutely, any new residential or employment development must have an integrated approach with regards accessibility to major transport corridors, public transport, alternative mobility and availability of alternative fuel infrastructure.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	33	Steve	Colella	District Councillor		The recently adopted Local Transport Plan (LTP4) has uniquely no investment or management plans for anywhere in the district over the life of the plan. This puts into doubt the delivery of the BDC Development Plan without any investment plan to meet the impact of any housing needs for the district and or from neighbouring authorities. The issue of how to get transient traffic to by-pass the Hagley intersection is a hot topic and needs to be quantified as part of the short and medium transport plan. This should start now and bring itself up to speed with current highways impacts.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	34	Sue	Baxter			Yes	Noted.
T4	35	Peter	King	Campaign to Protect Rural England		Where relevant, highway issues certainly need to be taken into account in determining development locations, but it will be more satisfactory to seek to use development opportunities as a means of solving problems. In some cases the measures required not only to mitigate for the effects of the development but also to alleviate existing problems may be so high as to make a development scheme unviable. In that event, government or other funding should be sought to implement the solution. If that cannot be obtained, clearly the development cannot proceed.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	41	Helen	Davies	Transport for West Midlands		TfWM believe that there are a number of transport principles that should be followed: <ul style="list-style-type: none"> <li>☑ Ensure a collaborative approach to future development and travel demand takes place with TfWM;</li> <li>☑ Fully integrate walking and cycling routes which provide internal permeability across the development but also are externally permeable to services and facilities in the wider urban area;</li> <li>☑ Increase development density around transport hubs and high frequency public transport routes;</li> <li>☑ Consider wider routes to key landmarks and destinations in the area (via all modes of travel);</li> <li>☑ Consider transport innovation and its role in future movement;</li> <li>☑ Develop good design facilitating safe movement and activity in accordance with Manual for Streets principles;</li> <li>☑ Look at the wider transport network and integrate any new development in to it, rather than interrupting it;</li> <li>☑ Incorporate greenspace and recreation areas for leisure to encourage active travel and healthy lifestyles (with adequate lighting, signage and frequent maintenance); and</li> <li>☑ Secure developer contributions to support improved transport infrastructure and, where necessary and appropriate, revenue support to ensure public transport penetration can be provided during early development phases.</li> </ul>	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed. The District Council will also continue to engage with stakeholders through the duty to cooperate on a range of matters including major transport issues and the location of development allocations.

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T4	42			Wythall Residents Association		Yes. The urban and rural road network is inadequate for traffic volumes and roads in Wythall require widening, junction improvements, traffic light control at major crossroads and prohibition of heavy vehicles and through traffic where alternative routes exist. E.g. Wythall/Hollywood, Alvechurch	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Innovative solutions can often come forward with development that mitigates its impact on the Highway Network. Do not consider existing transport issues should prevent sites from coming forward, should be assessed on a case by case basis.	Noted. The site selection process will consider the potential for site impacts to be mitigated.
T4	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	Existing transport issues and future infrastructure requirements should be a factor in identifying sites for housing but this should not be the overriding factor in consideration. Sites can mitigate their impact and provide infrastructure upgrades to ensure there is sufficient capacity within the network as well as other solutions to increase sustainability and public transport links. As such, the impact on the road network should be considered on a site-by-site basis, in line with the Council's evidence base, and should not prevent suitable sites, which can mitigate their impacts, from coming forward.	Noted. The site selection process will consider the potential for site impacts to be mitigated.
T4	54	Katherine	Else	Claremont Planning	Miller Homes	New growth and development should be directed towards areas that are well accommodated for in terms of transport infrastructure provision, including provision of public transport as well as the highway network.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	55	Tamara	Pleasant			Transport - need to properly encourage more sustainable and healthy ways to move around the district, particularly walking and cycling from settlements to public transport hubs. By: Promote footpath and bridleway use, more cycleways (segregation away from traffic), improved lighting and facilities (e.g. cycle storage) and traffic calming.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	The A441 Redditch Road adjacent to Birmingham in the North of the District provides excellent links to Birmingham, Bromsgrove and Redditch and therefore provide an excellent location for future growth that will provide much needed housing in a location which is sustainable which already benefits from excellent transport links including public transport and will reduce the level of commuting by car.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	72	Stephen	Peters			YES. The urban and rural road network is largely inadequate for modern-day traffic volumes and roads in Wythall require widening, junction improvements, traffic light control at major crossroads and prohibition of heavy vehicles and through traffic where alternative routes exist. E.g. Wythall/Hollywood, Alvechurch	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	78	Sean	Rooney	Harris Lamb	Barratt Homes	It is considered that existing and future infrastructure requirements are fundamental in deciding which sites should be allocated for development. Consideration if the site is capable of being developed with the existing amount of infrastructure present or whether following its development it can deliver an improvement to the transport infrastructure to the benefit new or existing residents. Our view is that sites in the first instance that have a low requirement for the provision of new infrastructure should be considered first over those that require significant improvement.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	80	John	Pearce	Harris Lamb	Bloor Homes	The decision to allocate land for new development should take into consideration whether the site is either capable of being developed with the existing level of infrastructure present or, whether following its development, it can deliver an improvement to the transport infrastructure to the benefit of new and existing residents alike. BHW have instructed an initial feasibility review of the Frankley site which has indicated that due to the scale of development envisaged, this would help internalise a number of trips such as school trips. Furthermore, the site has the ability to integrate with the existing public transport network to provide links between it and the city centre, whilst a number of local improvements are identified to increase capacity and manage travel demand patterns.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Existing and future infrastructure requirements are fundamental in deciding where sites should be allocated. Our view is that in the first instance, sites with a low requirement for the provision of new infrastructure should be considered first over those that require significant improvements.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.

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T4	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	The decision to allocate land for new development should take into consideration whether the site is either capable of being developed with the existing level of infrastructure present or, whether following its development, it can deliver an improvement to the transport infrastructure to the benefit of new and existing residents alike. Consider that existing and future infrastructure requirements are fundamental in deciding which sites should be allocated for development. In the first instance, sites that have a low requirement for the provision of new infrastructure should be considered first, over those that require significant improvements.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Take into consideration whether the site is capable of being developed with the existing level of infrastructure present or whether, following its development, it can deliver an improvement to the transport infrastructure to the benefit of new and existing residents. Consider this is fundamental in deciding which sites should be allocated for development. Sites that have a low requirement for the provision of new infrastructure should be considered first.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	86	Rebecca	Anderson	Iceni Projects	Generator Developments	Yes, as set out above a focus on tackling existing infrastructure shortages can ensure that new development can be considered to have a positive benefit in highways terms for the District. It makes sense to ensure that this is focused on Bromsgrove town as this will seek to ensure that the benefits of development remain within the District, rather than on the edge of Birmingham.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	89	Reuben	Bellamy	Lone Star Land	Cleint	Paragraph 103 of the NPPF states that the planning system should actively manage patterns of growth to support the transport objectives set out in paragraph 102. it says "Significant development would be focused in locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes." Therefore the answer to the question is 'yes'. Adopting a growth pattern based on Options 2 and 3 (transport Corridors and large settlements) is the only deliverable solution as much of the infrastructure exists- for example the rail network, albeit that there will still need to be investment.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	98	Sally	Oldaker			YES YES YES, a thousand times yes. This is probably the most important question in the whole damn thing.	Noted.
T4	99	Mark	Dauncy	Pegasus	Gallagher Estates	Development should be located in sustainable locations, including the availability and accessibility of public transport and supporting infrastructure.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Existing transport issues and future infrastructure requirements associated with the ability to provide suitable access for motorised vehicles, pedestrians and cyclists and local public transport provision should be a key consideration. Development opportunities that present the ability to utilise and connect with the existing highway network and facilities for non-motorised modes of transport should take priority over opportunities that do not present such attributes.  The Bromsgrove Golf Centre is well located for access to the high capacity network, which is subject to proposed improvements through the A38 upgrade programme, and relatively straight forward vehicle access opportunities at several locations. Also, there are considerable opportunities to easily integrate the site with pedestrian and cycle networks and facilities and public transport, including Bromsgrove Rail Station. This could include upgrades to existing provision as well as new links which will benefit both existing and new residents.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	115	John	Breese	Rosconn Strategic Land		Agree that existing transport issues and future infrastructure requirements should be a key factor in where new development is located in the future. In directing new development to locations close to existing public transport nodes the District can best exploit any improvements to these services and minimise the negative aspects associated with commuting such as congestion and emissions in line with NPPF paragraph 103.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	This should not be an overriding factor underpinning decisions as to where development is located. Should recognise the contribution that new development can make to improving usage and this the future viability of the network. By locating new development within settlements in close proximity to road and public transport infrastructure. Locating future development within settlements offering a range of employment, retail and community facilities would provide opportunities to encourage greater levels of walking and cycling.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.

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T4	119	Darren	Oakley	RPS Group	Gleeson	<p>Whilst it is important that the Council understand the current issues affecting the transport network, this should not be the overriding factor underpinning decisions as to where development should be located in the future.</p> <p>It is equally significant to recognise the contribution that new development can make to improving usage, and thus the future viability, of the network. This could be achieved, for instance, by locating new development within settlement in close proximity to road and public transport infrastructure (i.e. to increase current rail usage from 4%). Furthermore, locating future development within settlements offering a range of employment, retail and community facilities would clearly provide opportunities to encourage greater levels of walking and cycling for more local, short distance journeys.</p> <p>Such considerations should form a key part of any assessment concerning the selection and potential release of land for future development, whatever the current designation may be.</p>	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	120	Michael	Davies	Savills	Cala Homes	Development should be located adjacent to existing settlements and public transport routes. Existing transport issues are not a constraint as developers can contribute towards improving the issues and providing new infrastructure.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	122	Michael	Davies	Savills	Landowners	Future development should be located adjacent to existing settlements and public transport routes. We do not consider that existing transport issues are a constraint as new developments can contribute towards infrastructure improvements where appropriate. As part of the Council's evidence base existing transport infrastructure and public transport accessibility should be assessed and opportunities for supporting new housing and employment growth identify opportunities where investment in public transport and highway can be improved.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	123	Michael	Burrows	Savills	Landowners	Future development should be located adjacent to existing settlements and good public transport routes to assist with the delivery of sustainable communities. It is not considered that existing transport issues should be treated as a significant constraint to the delivery of new development because new developments can contribute towards infrastructure improvements where appropriate. This is especially the case where Green Belt release can ensure that a critical mass of residents are attracted to the area to ensure the viability of such improvements.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	124	Robert	Lofthouse	Savills	Taylor Wimpey	Yes. However it should be noted that changes in the way we work and travel should mean that the private car is not the key focus. Instead encouraging personal travel planning and effective public and sustainable modes of transport, in accordance with national policy should be key.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	140	Sarah	Butterfield	White Young Green	Client	In addressing the District's transport requirements, in accordance with para 104 of the National Planning Policy Framework (2018) the Local Plan should ensure that infrastructure requirements, including roadside services, are provided for. Such developments should be located along key transport routes, in sustainable and easily accessible locations to serve their target audience.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	151	Dawn	Macqueen			The hard infrastructure needs to dominate future expansion and it cannot be subservient to housing and employment plans.	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	160	I M	Jarrett			Transport (public/private) will need to be improved - 1 bus each way (daily) will not suffice.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	165	Johanna	Wood			Definitely - its a critical factor	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	166	John	Gerner			Yes, new development requires the supporting infrastructure and the planning system should be used to ensure existing/future development sites do not block potential infrastructure investment corridors. E.g. development on Whitford Road will prevent the delivery of a western distributor link road between Kidderminster Road and Puddle Wharf.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.

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T4	175	Michael	Waters			It is vital that all new building projects are supported by improved transport infrastructure.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T4	176	Mr & Mrs J D	Winslow			Given that the social, economic and environmental costs of vehicular modes of transport are increasingly recognised by individuals and government (NPPF paras 102 and 103), it is realistic to plan developments around areas with existing and effective transport networks and particularly in areas with easy access to railway stations. New housing developments should be able to demonstrate no adverse highway or traffic impact issues (NPPF para 85).	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T4	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		Yes. Should be considered on a cross authority basis.	Noted. The District Council will continue to engage with neighbouring local authorities through the duty to cooperate on a range of matters including major transport issues and the location of development allocations.
T4	194	Darren	Oakley	RPS	Clients	Whilst it is important that BDC understand the current issues affecting the transport network, this should not be the overriding factor underpinning decisions as to where development should be located in the future.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
<b>Q.T5: Do you think more radical transport infrastructure solutions should be considered for increasing capacity on the road network? What do you think these could be?</b>							
T5	1	Tammy	Williams	Alvechurch Parish Council		We should think very hard before simply increasing the capacity of the road network. Simply allowing more vehicle throughput will mean more air quality issues until diesel vehicles are phased out and electric vehicles become much more practical and popular. Infrastructure solutions should be sought for improvements that actually reduce the capacity on the road network. The provision of widespread super-fast broadband and improved technology methods can reduce some of the demand. Making public transport more easily accessible and significantly cheaper will also help discourage the use of vehicles.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T5	4	Barry	Spence	Bentley Pauncefoot Parish Council		Given the likely costs and timescale for 'radical' transport solutions we do not believe such solutions should be considered at this review.	Noted.
T5	10	Patricia	Dray	Highways England		This may be necessary dependant of the level of growth and ambition of that the Council sees for Bromsgrove district in land use terms. We would ask why a similar question is not posed for public transport and sustainable travel.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T5	20	P	Harrison	Wythall Parish Council		YES. Greater use of technology to ease traffic flows. Self-enforcing traffic calming to reduce average speeds in built-up areas. Provision of HGV parking areas and overnight accommodation facilities instead of roadside parking and use of lay-bys.	Noted. Some of these issues raised will be for consideration at a more detailed stage of the planning process, once planning applications are being considered for new developments. Issues such as speed enforcement are outside the scope of the Plan Review. The issue of HGV parking could be addressed through a site allocation in the emerging plan, should a need be evidenced and a suitable site be available and achievable.
T5	27			Stratford On Avon District Council		The review of Bromsgrove District Plan seems an ideal opportunity to promote a route strategy for the entire A435. Such work could form a subset of the existing and effective A46 Partnership (of which SDC is a member) that is considering various highway interventions to upgrade the A46 to expressway standards. Consideration should be given to the potential for bypassing the A435 around Mappleborough Green and Studley, and the potential significant benefits this would bring not just to those villages but also, indirectly, to the northeast part of Bromsgrove District.	Noted. The District Council will continue to engage with Worcestershire County Council on such issues and through the duty to cooperate with other neighbouring local authorities.
T5	32	Robert	Spittle	Bromsgrove Economic Theme Group		The adoption of manipulative parking charges to influence behaviour HGV control and restrictions Eastern access road connecting to J2 M42 One-way street on Bromsgrove High Street with herringbone short stay parking	Noted. Some of these issues raised will be for consideration at a more detailed stage of the planning process, once planning applications are being considered for new developments, or are outside the scope of the Plan Review. The District Council will continue to engage with the highways authority for the area (WCC) as well as Highways England, who are responsible for the operation of the strategic road network.
T5	34	Sue	Baxter			Yes	Noted.

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T5	35	Peter	King	Campaign to Protect Rural England		Where relevant, highway issues certainly need to be taken into account in determining development locations, but it will be more satisfactory to seek to use development opportunities as a means of solving problems. In some cases the measures required not only to mitigate for the effects of the development but also to alleviate existing problems may be so high as to make a development scheme unviable. In that event, government or other funding should be sought to implement the solution. If that cannot be obtained, clearly the development cannot proceed.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T5	42			Wythall Residents Association		Yes. Greater use of technology to ease traffic flows. Self-enforcing traffic calming to reduce average speeds in built-up areas. Provision of HGV parking areas and overnight accommodation facilities instead of roadside parking and use of lay-bys.	Noted. Some of these issues raised will be for consideration at a more detailed stage of the planning process, once planning applications are being considered for new developments. Issues such as speed enforcement are outside the scope of the Plan Review. The issue of HGV parking could be addressed through a site allocation in the emerging plan, should a need be evidenced and a suitable site be available and achievable.
T5	55	Tamara	Pleasant			Transport - need to properly encourage more sustainable and healthy ways to move around the district, particularly walking and cycling from settlements to public transport hubs. By: Promote footpath and bridleway use, more cycleways (segregation away from traffic), improved lighting and facilities (e.g. cycle storage) and traffic calming.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T5	70	Susan	Forrest			There should be a dual carriageway or alternative control to ease congestion on the A38	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T5	72	Stephen	Peters			YES. Greater use of technology to ease traffic flows. Self-enforcing traffic calming to reduce average speeds in built-up areas. Provision of HGV parking areas and overnight accommodation facilities instead of roadside parking and use of lay-bys.	Noted. Some of these issues raised will be for consideration at a more detailed stage of the planning process, once planning applications are being considered for new developments. Issues such as speed enforcement are outside the scope of the Plan Review. The issue of HGV parking could be addressed through a site allocation in the emerging plan, should a need be evidenced and a suitable site be available and achievable.
T5	89	Reuben	Bellamy	Lone Star Land	Cleint	Increasing capacity on the road network typically ends up by increasing the numbers of vehicles on the roads. The 'radical' approach is to allocate land and development in locations that offer a genuine choice of transport choices, as required by paragraph 103 of the NPPF. This means adopting a growth strategy based on Options 2 and 3 (Transport Corridors and Large Settlements).	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T5	98	Sally	Oldaker			Hello? Western Bypass? And better train/bus links. And lower ticket pricing. Also, don't even think about building any more houses until you've got the roads sorted.	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T5	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Strategic development around the periphery of Bromsgrove will only exacerbate existing problems within the A38 and M5 motorway, as planned strategic development around Kidderminster will continue to create more commuting towards Bromsgrove in order to access the motorway network. Without potentially a new M5 junction somewhere close to the Kidderminster Road, it is unlikely that congestion will be significantly reduced in the longer term. This will be a radical solution, but one that will have to have serious consideration, alongside the improvement of M42 J1.	Noted. The District Council will continue to engage with the highways authority for the area (WCC) as well as Highways England, who are responsible for the operation of the strategic road network.
T5	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Strategic development around the periphery of Bromsgrove will only exacerbate existing problems within the A38 and M5 motorway, as planned strategic development around Kidderminster will continue to create more commuting towards Bromsgrove in order to access the motorway network. Without potentially a new M5 junction somewhere close to the Kidderminster Road, it is unlikely that congestion will be significantly reduced in the longer term. This will be a radical solution, but one that will have to have serious consideration, alongside the improvement of M42 J1.	Noted. The District Council will continue to engage with the highways authority for the area (WCC) as well as Highways England, who are responsible for the operation of the strategic road network.



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T5	113	Gareth	Sibley	RCA Regeneration	CAD Square	Strategic development around the periphery of Bromsgrove will only exacerbate existing problems within the A38 and M5 motorway, as planned strategic development around Kidderminster will continue to create more commuting towards Bromsgrove in order to access the motorway network. Without potentially a new M5 junction somewhere close to the Kidderminster Road, it is unlikely that congestion will be significantly reduced in the longer term. This will be a radical solution, but one that will have to have serious consideration, alongside the improvement of M42 J1.	Noted. The District Council will continue to engage with the highways authority for the area (WCC) as well as Highways England, who are responsible for the operation of the strategic road network.
T5	124	Robert	Lofthouse	Savills	Taylor Wimpey	Yes. There are opportunities to encourage the use of more sustainable transport modes.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T5	165	Johanna	Wood			Yes I do. The very nature of Bromsgrove's location and the limited public transport links if you don't work in Birmingham or along the rail route means that the use of cars will remain very high with all the associated issues this brings. The challenge is how to encourage people out of cars onto public transport. For that to happen a revolution in public transport is required that ensures it is timely, affordable and will get people to their place of work in reasonable time even if they don't work in Birmingham or on the rail route.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T5	166	John	Gerner			Yes. New M5 junction between junction 5 and Kidderminster Road with a spur to the puddle wharf roundabout. Reroute the A448 along a new Kidderminster Road to Birmingham Road link to make use of the A38 and alleviate Town Centre congestion.	Noted. The District Council will continue to engage with the highways authority for the area (WCC) as well as Highways England, who are responsible for the operation of the strategic road network.
T5	179	Neil	Gow	Burcot Garden Centre	Self	Again we need joined up thinking. The new rail facility in Finstall is great, but you cannot access it by road or other public transport to make use of it. For example, the new retail facility where Homebase was built has caused mayhem with school traffic, delivery lorries trying to access the park and industrial areas and commuter traffic. We need to get people off the roads, out of their cars if the planet is to survive, but we have to provide, easy, convenient cost effective alternatives. There are other areas in the county where new housing developments have been created without pavements, new foot ways created without cycle lanes, new railway stations without links to other public transport. It is short sighted bonkers thinking, always just taking the easy solution. We need to think and plan strategically.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T5	192			Dodford with Grafton Parish Council		The recent improvement of the train links to Birmingham offer the chance to leapfrog some of these issues; if the service could be seen to be more reliable, and the road links to the station upgraded (perhaps with cycle path facilities as well as a better set of junctions), then more people might use the trains, and reduce the load on the roads. Completion of the apparently endless motorway development work (M42 and M5) would also help to mitigate the traffic flow problems through the district. Transport improved rail station facilities and increased train frequencies have encouraged greater use for realistically have made commuting easier both for work and shopping. This obviously has implications for local employment and town centre shopping.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T5	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		Consideration of a new Western Orbital Motorway for the West Midlands, no details of what the proposal could look like. May fall outside of the plan period in terms of delivery.	Noted. The District Council are aware of this proposal but similarly have no further details at this stage therefore it does not form part of the BDP Review.
<b>Q.T6: Which areas of the District do you consider to be most sustainable in terms of public transport accessibility?</b>							
T6	1	Tammy	Williams	Alvechurch Parish Council		The most sustainable areas are around Bromsgrove town because access there is easiest to both the A38 and the rail network (especially as Bromsgrove has both a new station and a large car park) Larger developments around the smaller settlements in the District are much less sustainable because they will put excessive demands on local infrastructures and community services, which are already under stress.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	2	Gill	Lungley	Barnt Green Parish Council		The question is misleading. If areas are sustainable now, it does not follow that they will continue to be sustainable with increased transport usage. If a railway station car park is now just at capacity, the station facility is sustainable but without tackling the parking implications, such a station would no longer be sustainable with increased footfall.	Noted. It is acknowledged that where existing infrastructure is at or close to capacity then mitigation or investment would be needed to cater for new development and any impact it has on this infrastructure.
T6	4	Barry	Spence	Bentley Pauncefoot Parish Council		The most sustainable areas in terms of public transport must be Bromsgrove town and the other main settlements, particularly those located on A roads	Noted.
T6	5	Kevin	Joynes	Beoley Parish Council		Beoley isn't served well by public transport, almost no bus service which comes through the village. District Council should subsidise the provision of public transport for those who can't access other means of transport.	Noted. WCC are the transport authority for the District and have statutory duties with regards to passenger transport provision.

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T6	9	Alexandra	Burke	Hagley Parish Council		Services need to be sufficient frequent to constitute a turn up and go service, with clean coaches. The Stourbridge line has a very good service as far as Stourbridge, grave and urgent need for more Park and Ride car parks. Hagley Station only has a very small car park. BDC should work with Wyre Forest DC to ensure that their new Plan provides for such a car park, (field next to Blakedown Station). In conjunction with this it would be necessary for more trains to run through to Kidderminster to provide a turn up and go service. The existing scheduled bus service is irregular and intermittent and doesn't provide a commuter route alternative. It is currently undergoing a review and expected that the service will be cut altogether. Support for Dial A Ride service schemes which should be supported with subsidies to allow wider community use.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process. Revisions to the emerging Wyre Forest DC Local Plan now include a proposal for a site allocation adjacent to Blakedown station to include a new station car park.
T6	10	Patricia	Dray	Highways England		The most sustainable areas are the ones located in the vicinity of and with good access to a rail station, such as Barnt Green, Bromsgrove and Redditch. However there has to be sufficient space in the vicinity of the railway station for new development to be built or a sufficient quantum of development to allow the provision of public transport and sustainable travel to the station. We have recorded our views on the level of development in Bromsgrove.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	20	P	Harrison	Wythall Parish Council		Bromsgrove town / new railway station.  Hagley railway station. Wythall railway station (but it needs a car park). Rubery which has city bus services.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	28	Emily	Barker	Worcestershire County Council		WCC is currently reviewing service provision within Bromsgrove to improve public transport and to link recent developments to key services. Important to ensure development sites have good access to existing services or contribute towards enhancing routes and frequency of service.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review.
T6	33	Steve	Colella	District Councillor		Blanket use of rail stations as a driver for development on the grounds of sustainability is questioned. Rail stations are only a sustainable means of transport if adequate parking is provided, most train users won't walk or cycle. Therefore, available development in close proximity (walking or cycling) of train stations is minimal (excepting Bromsgrove Town station). It should also not be assumed that employment is situated within the catchment area of a station.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	34	Sue	Baxter			All those on rail network, Bromsgrove town, Hagley, Alvechurch, Wythall (if it had a railway station) Rubery is on main Birmingham bus route.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T6	35	Peter	King	Campaign to Protect Rural England		The Stourbridge line has a "Turn-up and Go" service, but only from Stourbridge. BDC should work with Wyre Forest DC and Worcestershire County Council to secure a better service at Kidderminster and Blakedown Stations, with improved free Park and Ride car parking. Parking costs should be recovered through the sale of rail tickets.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process. Revisions to the emerging Wyre Forest DC Local Plan now include a proposal for a site allocation adjacent to Blakedown station to include a new station car park.
T6	35	Peter	King	Campaign to Protect Rural England		The Stratford line (which has two stations near Wythall) only has services every half hour, which does not constitute a "Turn-up and Go" service.	Noted.
T6	35	Peter	King	Campaign to Protect Rural England		These need to operate with a frequency sufficient for people to treat them as "turn up and go" services. This should be feasible for buses in Bromsgrove town and on the railways, but without very considerable public subsidy will not be viable elsewhere.	Noted.
T6	35	Peter	King	Campaign to Protect Rural England		Train services from most of the stations are fairly frequent, but those from Bromsgrove may still need to be upgraded, to make it into "Turn-up and Go" service. It is unfortunate that Bromsgrove Station is so far from the town centre. This is ultimately a consequence of how the Birmingham & Gloucester Railway was created in the early days of mainline railways. This is a problem that cannot be resolved.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	35	Peter	King	Campaign to Protect Rural England		In most of the district, bus transport is infrequent, irregular, and unreliable, and there is no service in the evening. This means that any person who is not working a standard 9-5 or 8-4 day has no option for getting to work other than using a car. Services may be acceptable in Bromsgrove. There may be also an acceptable service in Rubery and Cofton Hackett, as a result of Birmingham-based services continuing to them. This makes most locations in the district fundamentally unsustainable.	Noted.

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T6	40	Fraser	Pithie	Shakespeare Line Promotion group		Wythall railway station attracts a substantial number of passenger journeys (55,744 per year). Indeed, between 1997 and 2017 passenger journeys at Wythall increased its usage by 146% passenger journeys despite overall demand being suppressed by the current limitations of an hourly interval service and no transport interchange infrastructure. The results from online surveys that SLPG carried out in Spring 2018 clearly indicated users wish to see more frequent train services between Stratford upon Avon and Birmingham (i.e.at 30 minutes). The second service in the hour would no longer turn back at Whitlocks End as it does now but run semi-fast calling at Wythall, Henley in Arden and Stratford upon Avon in both directions. This would mitigate inconvenience faced by passengers at Wythall when trains forming the current hourly service are cancelled. Moreover, a thirty-minute frequency service would effectively provide Wythall and nearby Hollywood with a "Turn up and Go" rail service currently enjoyed by stations up to and including Whitlocks End but no further. This supports both 7.6 and 7.21 of the BDPR.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	41	Helen	Davies	Transport for West Midlands		Train stations within Bromsgrove District Council are found at the larger village settlements of Alvechurch, Barnt Green, Hagley and Wythall in addition to Bromsgrove railway station. Where growth can be accommodated close to these stations, this is welcomed by TfWM. Moreover with electrification of services now commenced, Bromsgrove railway station now has four trains per hour serving Birmingham. Additionally with increased car parking capacity, rail travel becomes an attractive mode.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	42			Wythall Residents Association		Bromsgrove town / new railway station. Hagley railway station. Wythall railway station (but it needs a car park). Rubery which has city bus services.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Note that the WM conurbation was not taken into consideration as part of the adopted settlement hierarchy. Birmingham's unmet needs , given the access to transport connections and facilities/services, cannot be separated from Bromsgrove's assessment of sustainable locations. Need to additionally review public transport connections which are available within the conurbation but located outside the District. The settlement edge to Birmingham City is considered to be the most suitable and sustainable location for this to be provided.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review.
T6	45	Kathryn	Venthams	Barton Willmore	Taylor Wimpey	The areas around the major settlements in the District are the most sustainable and benefit from existing infrastructure and public transport links.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	51	Gemma	Jenkinson	Claremont Planning	Spitfire Bespoke Homes	Land under control of Spitfire Homes at Barnt Green and Cofton Hackett demonstrate high levels of accessibility given their locations at the edge of Birmingham city where there are extensive options for public transport and at Barnt Green, which benefits from the rail station on the Cross-City line. Both sites demonstrate high levels of accessibility and as such will be able to establish sustainable development that will not be required to rely on the private car for general transport purposes. In line with their sites, Claremont Planning on behalf of Spitfire Homes, advance that locations such as at the edge of Birmingham and the West Midlands Conurbation and at villages such as Barnt Green with access to the strategic public transport network should be considered for general locations for development. The revised NPPF emphasises that preference for development should be made towards those existing public transport hubs and nodes, as such, areas of the District which have existing excellent access to the strategic transport network, such as demonstrated at Hagley and Barnt Green for example (rail stations) and at urban edges where access to the city transport network is extensive.  Exploitation of the existing transport network and infrastructure should be considered in the first instance, given that this will not require significant intervention and investment to expand the network to take in areas that are currently less accessible. Therefore, it is advanced to the council that due consideration should take into account this existing infrastructure as a key component of the spatial strategy and preferred distribution of development within the District.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
T6	52	Tom	Ryan	Claremont Planning	Bellway Homes	The site under control by Bellway Homes demonstrates a highly sustainable and sensible location for further growth at the edge of Bromsgrove. The site is in close proximity to Bromsgrove rail station and as such is able to take full advantage of the strategic accessibility the station provides. New services have recently been introduced at the station, with trains running into Birmingham city centre up to every 10 minutes. This is a significant change for Bromsgrove and its environs given that the town and is now within easy reach of the large service base and employment market that the city, and wider city region, can provide. Therefore, the site provides a logical direction of growth to the east of the town that is able to take full advantage of the excellent strategic transport links that Bromsgrove station can provide. Therefore, it is advanced to the council that due consideration should take into account this existing infrastructure as a key component of the spatial strategy and preferred distribution of development within the District.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	Alcester Road, Lickey End - whilst in a semi-rural settlement location, demonstrate high levels of accessibility given its proximity to the strategic highways network at the M42 as well as close to the A38 and Bromsgrove town itself. The site is well served by public transport, with hourly services passing through Lickey End between south Birmingham and Droitwich Spa. Generally, the site can establish that reliance on the private car will not be a requirement for the site, given its levels of accessibility and proximity to Bromsgrove. The public right of way that passes through the site will be incorporated into any scheme and as such, its presence will be promoted as an alternative route to Bromsgrove, which by using the path, is only a 30 minute walk into the town centre from the village. Whilst this may be too great a distance for some members of the public, this promotion of provides healthier and more sustainable alternatives to gain access to the town centre other than by car. The exploitation of such assets that can maximise other modes of transport, such as by foot and cycle, demonstrates sustainable development socially, through the promotion of healthier lifestyles and environmentally, by detracting the attractiveness of travelling by car and thereby reducing emissions and congestion.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	72	Stephen	Peters			Bromsgrove town / new railway station. Hagley railway station. Wythall railway station (but it needs a car park). Rubery which has city bus services.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	78	Sean	Rooney	Harris Lamb	Barratt Homes	Due to their size Bromsgrove Town and other large settlements like Alvechurch are considered to be the most sustainable in terms of public transport accessibility as they are the main destination for a number of bus services serving both the town and wider district. Furthermore the presence of a train station providing links to Birmingham and Worcester also assists greatly to the Town's public transport accessibility.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Bromsgrove town and other large settlements such as Stoke Prior are considered to be the most sustainable in terms of public transport accessibility as the main destination for a number of bus services. The train station at Bromsgrove also assists with public transport accessibility for the town and peripheral areas.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	The settlements identified in paragraphs 1.3 of the Consultation Document are the most sustainable	Noted.
T6	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Bromsgrove town is the most accessible due to being the main destination of a number of bus services an the presence of a trains station.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	86	Rebecca	Anderson	Iceni Projects	Generator Developments	We consider that Bromsgrove, is the most sustainable location as it's the biggest town and has the most services and facilities. It also has a train station for which the line was recently electrified increasing the frequency of services in this location.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.

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T6	89	Reuben	Bellamy	Lone Star Land	Cleint	The most sustainable parts of the District with regard to public transport are the rail corridors and, more particularly, the Large Settlement that have train stations, such as at Wythall and Alvechurch.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	89	Reuben	Bellamy	Lone Star Land	Cleint	There are five larger settlements that lie on rail corridors, Hagley, Bromsgrove, Alvechurch, Barnt Green and Wythall, albeit Bromsgrove station is not particularly well related to the town. Wythall lies within the A435 corridor and is close to the M42/A435 junction. Our client owns land next to the station that could be allocated for car parking and residential development. This would enable an improvement in service to a half-hourly service, as promoted by the Shakespeare Line Promotion Group.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	99	Mark	Dauncy	Pegasus	Gallagher Estates	Broadly agree that the existing settlement hierarchy is reflective of the most sustainable settlements within the District. It would be appropriate for the LPR to also consider the accessibility of areas adjacent to exiting built form within neighbouring authorities - areas adjacent to the West Midlands conurbation and the built up area of Redditch.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	It is considered that Bromsgrove is the most accessible in terms of public transport. The bus station is located to the west of the High Street and receives 18 different routes, serving locations including Worcester, Redditch, Kidderminster, Halesowen, Droitwich Spa, Stourbridge and Rubery. Local bus stops are also provided throughout the town, including on Stratford Road and within the Oakalls estate. The rail station and services have recently been upgraded, with regular direct services into Birmingham where around 28% (Census 2011) of Bromsgrove residents work. Hourly services are provided between Birmingham New Street and Hereford, and three trains per hour in each direction on the Cross City line serve New Street and Four Oaks / Lichfield.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	The most sustainable parts of the District are those with some services, good bus or rail links, or in areas with relatively uncongested routes nearby. Many of the settlements with railway stations will struggle to significantly increase modal shift without parking facilities and there is very little scope to do this in most places. So unless capacity from the TOCs is improved, this is likely to remain as it is particularly during the am and pm peaks.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In response to T6-8: the most sustainable parts of the District are those with some services, good bus or rail links, or in areas with relatively uncongested routes nearby. Many of the settlements with railway stations will struggle to significantly increase modal shift without parking facilities and there is very little scope to do this in most places. So unless capacity from the TOCs is improved, this is likely to remain as it is particularly during the am and pm peaks.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	112	Gareth	Sibley	RCA Regeneration	Piper Group	Most sustainable parts of the District are those with some services. Many of the settlements with railway stations will struggle to increase modal shift without parking facilities. All major development can make contributions towards public transport provision as long as it doesn't undermine viability.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	113	Gareth	Sibley	RCA Regeneration	CAD Square	The most sustainable parts of the District are those with some services, good bus or rail links, or in areas with relatively uncongested routes nearby. Many of the settlements with railway stations will struggle to significantly increase modal shift without parking facilities and there is very little scope to do this in most places. So unless capacity from the TOCs is improved, this is likely to remain as it is particularly during the am and pm peaks.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	120	Michael	Davies	Savills	Cala Homes	Areas adjacent to existing settlements which are served by buses/trains are the most sustainable. Consider that the areas of Lickey and Marlbrook are sustainable.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.

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T6	122	Michael	Davies	Savills	Landowners	We consider areas adjacent to existing settlements which are served by buses and/or trains are the most sustainable. Catshill presents as a sustainable settlement in terms of accessibility to public transport links and proximity to the A38, M5, M42 and Birmingham conurbation. In particular it should be noted that land bound by Woodrow lane and Halesowen Road, Catshill has a bus stop adjacent to the site which provides connections to Birmingham every half an hour at peak times, with the route allowing for travel to Longbridge train station in approximately 20 minutes, with onward connections possible to Birmingham and the wider rail network or alternatively Bromsgrove and Redditch. A bus also runs every half an hour during peak times towards Worcester, reaching Bromsgrove bus station in approximately 15 minutes.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	123	Michael	Burrows	Savills	Landowners	It is considered that areas adjacent to existing settlements which are served by buses and/or trains are the most sustainable. Alvechurch is an existing Large Settlement.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	124	Robert	Lofthouse	Savills	Taylor Wimpey	The Perryfields development is in a highly accessible location and therefore suitable for housing.	Noted. This site is allocation BROM2 in the currently adopted BDP.
T6	134	David	Barnes	Star Planning	Richborough Estates	In order to promote sustainable travel, the most sustainable and accessible locations are those settlements which are located along the 2 rail corridors radiating out of the conurbation (i.e. the Cross City line which serves Bromsgrove, Barnt Green and Alvechurch and the Kidderminster line which serves Hagley). These rail corridors also reflect high frequency bus routes between the conurbation and Bromsgrove, Redditch and Kidderminster. Sites adjacent to the conurbation, such as at Hagley, also have the potential to promote sustainable travel with the ability to connect by foot, cycle, rail and bus to existing facilities and services within the built-up area. It is far easier to financially support new or extended bus services if the catchment includes both existing residential communities and the future occupiers of new homes.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	137	Matthew	Fox	Turley	Redrow Homes	Catshill is Large Settlement with the third highest population in the District and benefits from close proximity to the District's largest settlement – Bromsgrove town – as well as regular bus services linking key settlements including Bromsgrove, Worcester, Droitwich and Birmingham. It is therefore a location which benefits from access to various sustainable modes of transport and this should be reflected in the spatial distribution strategy.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	166	John	Gerner			The Bromsgrove urban area in general, with locations close to the train station being particularly sustainable in terms of public transport.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	176	Mr & Mrs J D	Winslow			Bromsgrove town itself, (cf. District Plan, para. 8. 20) and the larger villages in the district are more sustainable in terms of transport provision. Density of population and availability of alternative modes will inevitably affect take-up.	Noted. Further detail on the spatial strategy and distribution of development will inform consultation on the preferred option of the plan review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T6	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		Hagley is well served by train services . Bus services are very limited, wish to protect these and encourage new ones.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
<b>Q.T7: At what size and scale of development do you think it is necessary to directly provide for public transport provision?</b>							
T7	1	Tammy	Williams	Alvechurch Parish Council		It's difficult to generalise here. The impact of every development must be assessed against the specific area to where it's located within the District. The marginal impact of new developments must also be assessed alongside how well public transport provision is coping with existing levels of usage. That usage will come not just from a particular Parish or area within the District but also from people who live outside Bromsgrove. An example is the usage made of Alvechurch station (and its car park) by residents of northern Redditch (as the Redditch station car park is chargeable and Alvechurch is not). As a general principle future developments within Bromsgrove District must take account of cross-boundary impacts e.g. traffic volumes on primary routes are heavily influenced by road users coming through the District.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review.

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T7	4	Barry	Spence	Bentley Pauncefoot Parish Council		This is a question for the public transport operators. Certainly major developments such as the proposed Foxlydiate scheme should have a bus service from first occupations and developer should subsidise the service.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	5	Kevin	Joynes	Beoley Parish Council		Beoley isn't served well by public transport, almost no bus service which comes through the village. District Council should subsidise the provision of public transport for those who can't access other means of transport.	Noted. WCC are the transport authority for the District and have statutory duties with regards to certain forms of passenger transport provision.
T7	9	Alexandra	Burke	Hagley Parish Council		Don't believe that this is feasible for such major infrastructure projects to be funded from development.	Noted.
T7	10	Patricia	Dray	Highways England		Again the key is the development of a robust transport evidence base that will allow informed choices in terms of development location and quantum to be made. We have already commented on the need for a critical mass of development in single location(s) to support the development if such opportunities to mitigate the transport impacts of development.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review.
T7	20	P	Harrison	Wythall Parish Council		All new developments require thought since the slow incremental growth of new homes has not attracted any new bus services. In, fact Wythall has a worse service now than it did in the 1960s.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	28	Emily	Barker	Worcestershire County Council		Development should ideally be situated within 400m walking distance to a bus stop. Distances of greater than 800m are not ideal.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	34	Sue	Baxter			There needs to be a rethink on how public transport is provided. Public transport provision should form an integral part of any development, such as the use of small feeder buses and community transport	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	42			Wythall Residents Association		All new developments require thought since the slow incremental growth of new homes has not attracted any new bus services. Wythall has a worse service now than it did in the 1960s.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	Provision of an improved public transport network will be explored to support development. (Site specific)	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	45	Kathryn	Venthams	Barton Willmore	Taylor Wimpey	The provision of public transport should be evidence-based and considered on a site-by-site basis in conjunction with the Highway Authority.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	54	Katherine	Else	Claremont Planning	Miller Homes	The requirement for sites to bring forward infrastructure provision as part of the proposal or development contribution must depend on the extent of the development, its scale and its number in terms of dwellings that it will introduce. If the Plan is to remain effective in achieving requisite developer contributions, but also to maintain an adequate level of growth that can meet the identified need of the Plan, policy must ensure that it is not overly restrictive or prescriptive in its requirements of developer's proposals to realise sites.	Noted.
T7	72	Stephen	Peters			All new developments require thought since the slow incremental growth of new homes has not attracted any new bus services. In, fact Wythall has a worse service now than it did in the 1960s.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	78	Sean	Rooney	Harris Lamb	Barratt Homes	All developments, regardless of scale need to be considered individually based on their location, existing public transport provision and accessibility. For instance, a site located next to a large settlement, may already be served by the appropriate levels of public transport to accommodate new development and may not justify the provision of new public transport services. Furthermore new services are not always required, as existing services could be rerouted to accommodate new development. In instances where sites do not have sufficient access to public transport, assessments should be undertaken to determine the level of provision that is required. This should take place on a case by case basis.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	80	John	Pearce	Harris Lamb	Bloor Homes	BHW experience indicates that it becomes necessary to ensure that new development is served by public transport where more than 1,000 dwellings are proposed. This could entail re-routing existing services through the development by creating routes that are capable of accommodating buses. New services would only, in our view, be necessary where there are no existing services in the vicinity and where a significant amount of new housing was proposed.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.

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T7	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	All developments, regardless of scale, need to be considered individually based on their location, public transport provision and accessibility. A site may already be served by the appropriate level of public transport to accommodate new development and may not justify the provision of new services. Existing services can also be rerouted to accommodate development. Assessments should take place on a case by case basis.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	For smaller developments we would expect that they would be located within walking distance of either existing bus stops or a train station. As such, we would not expect there to be any requirement to specifically provide additional public transport services as a result of the development.  Would only expect there to be any requirement to provide additional public transport services when the scale of development exceeded 500 dwellings or more, and even then, this would more than likely involve re-routing of bus routes into the development rather than necessarily providing completely new services.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Smaller developments should be located within walking distance of either existing bus stops or a train station. Only expect there to be any requirement to provide additional public transport services when the scale of development exceeded 500 dwellings or more, this would most likely involve the re-routing of buses than providing completely new services.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	The CIHT document “Buses in Urban Environments” (2018) sets out that “buses gain and retain acceptable levels of use where development has sufficient overall density and mix of uses. Lower-density developments generally do not lend themselves to viable bus operation”. It also states that “to meet policy objectives to the fullest extent, and to ensure that bus-orientated developments are not undermined, local authorities must ensure that all developments are bus-orientated”. Guidance suggests that bus stops should be provided at approximately 300m spacings to maximise dwellings within easy walk of these.  If a site is not within walking distance of an existing bus service, where possible, diversion of an existing high frequency bus route may be the best option for servicing a new development. Provision of a new bus service may be most appropriate where existing local provision is limited, but costs of running the service will need to be carefully considered against likely fare income to ensure that any new route can operate in the long term as a commercial service without requiring ongoing subsidy. Experience in the past has indicated that a bus service will need to serve around 2,000 homes (including any new development as well as existing homes along the route) to be profitable, although this will vary depending on local fares, typical usage levels and proportion of concessionary fare users.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	All major development can make contributions towards public transport provision as long as the sums to not undermine development viability. What is likely to increase the use of public transport is lower prices and increased frequency/capacity of service, together with a fair pricing strategy to reduce car use, unless it they are electric/hybrids.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	All major development can make contributions towards public transport provision as long as the sums to not undermine development viability.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	113	Gareth	Sibley	RCA Regeneration	CAD Square	All major development can make contributions towards public transport provision as long as the sums to not undermine development viability.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	120	Michael	Davies	Savills	Cala Homes	Amount of public transport provision should be determined on a site by site basis, contributions should be made in the form of S106/CIL.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	122	Michael	Davies	Savills	Landowners	The amount of public transport provision should be determined on a site-by-site basis. Contributions should be made as part of a development in the form of S106/CIL to contribute towards public transport provision.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	123	Michael	Burrows	Savills	Landowners	The amount of public transport provision should be determined on a site-by-site basis. Contributions towards public transport provision should be made to support new development proposals in the form of S106/CIL payments in accordance with Regulation 122 of the Community Infrastructure Levy Regulations (2010, as amended).	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T7	124	Robert	Lofthouse	Savills	Taylor Wimpey	All scales of development should be supporting public transport, for example, through the use of a CIL.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.



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T7	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		Distance to services is also important	Noted. Accessibility to services will be a key consideration in the site selection process.
<b>Q.T8: Is there anything specific that would encourage you to use public transport services more as opposed to travelling by car?</b>							
T8	1	Tammy	Williams	Alvechurch Parish Council		Public transport needs to be priced appropriately to attract local people to make the modal shift from car to rail. Bus services are not a practical alternative here as there are too few of them for many people but making sure all forms of public transport overlap and were linked to each other, especially by making sure that main arterial bus routes were linked at rail stations, would go a long way to encourage abandoning the car.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	2	Gill	Lungley	Barnt Green Parish Council		Yes. The railway station facilities at Barnt Green have not been adequately updated to reflect the improved service following the electrification to Bromsgrove. There is only 1 ticket machines on a middle platform, there are no train information screens on one of the platforms from which cross city trains run to Birmingham. Network Rail continues to defy the law and has not installed lifts with the new footbridge, so access is impaired for the disabled and elderly. The bus service between Bromsgrove and Barnt Green, though normally hourly, has some large gaps, specifically in the afternoon timetable. Bromsgrove ought to have a more modern bus station with adequate shelter from the rain and electronic timetable information.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	4	Barry	Spence	Bentley Paucefoot Parish Council		In a rural area such as ours there are no bus services at all. The only potential might be for a 'hail and ride' or similar. The train service into Birmingham is attractive but more usage may be encouraged if parking at the station were cheaper.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	5	Kevin	Joynes	Beoley Parish Council		Beoley isn't served well by public transport, almost no bus service which comes through the village. District Council should subsidise the provision of public transport for those who can't access other means of transport.	Noted. WCC are the transport authority for the District and have statutory duties with regards to passenger transport provision.
T8	9	Alexandra	Burke	Hagley Parish Council		The use of cars is inevitable for those who can afford it.	Noted.
T8	20	P	Harrison	Wythall Parish Council		Increased frequency. Higher quality buses and customer-focused operators. Real-time information displays at bus stops.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	28	Emily	Barker	Worcestershire County Council		Important to include Personalised Travel Plans within development proposals, can encourage a switch away from the private car to journeys on public transport.	Noted.
T8	32	Robert	Spittle	Bromsgrove Economic Theme Group		Attention has to be paid to the effectiveness of the train station, does it meet the needs of the traveller in terms of parking and other transport such as bus services and taxi operators. The EDTG suggests that none of the complimentary services are fit for purpose. Again, monitoring of other stations in the District needs to be done, to understand if for example Hagley, Barnt Green, Alvechurch, Wythall stations experience more increased commuter traffic and why.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	33	Steve	Colella	District Councillor		The existing scheduled bus service is irregular and intermittent and does not provide a commuter route alternative. It is currently undergoing a review and expected that the service will be cut altogether. In such a case the Hagley Dial a Ride should be supported with subsidies to allow wider Hagley community use.	Noted. WCC are the transport authority for the District and have statutory duties with regards to passenger transport provision.
T8	34	Sue	Baxter			Frequent and reliable service,	Noted.
T8	35	Peter	King	Campaign to Protect Rural England		The Stourbridge line has a "Turn-up and Go" service, but only from Stourbridge. BDC should work with Wyre Forest DC and Worcestershire County Council to secure a better service at Kidderminster and Blakedown Stations, with improved free Park and Ride car parking. Parking costs should be recovered through the sale of rail tickets.	Noted. Revisions to the emerging Wyre Forest DC Local Plan now include a proposal for a site allocation adjacent to Blakedown station to include a new station car park.
T8	35	Peter	King	Campaign to Protect Rural England		We need frequent bus and train services in clean coaches.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	42			Wythall Residents Association		Increased frequency. Higher quality buses and customer-focused operators. Real-time information displays at bus stops.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	55	Tamara	Pleasant			Transport - need to properly encourage more sustainable and healthy ways to move around the district, particularly walking and cycling from settlements to public transport hubs. By: Promote footpath and bridleway use, more cycleways (segregation away from traffic), improved lighting and facilities (e.g. cycle storage) and traffic calming.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	72	Stephen	Peters			Increased frequency. Higher quality buses and customer-focused operators. Real-time information displays at bus stops.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.

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T8	89	Reuben	Bellamy	Lone Star Land	Cleint	The use of public transport would be improved by the quality and regularity of the service and the ability to conveniently access the public transport. Bus services tends to be stuck in the same congestion as cars, therefore rail services are the most attractive. Ideally a train station within walking distance of the home with a regular service.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	98	Sally	Oldaker			Increased services and make them more affordable. At the moment train companies can charge whatever they want, and prices fluctuate at will. Perhaps if the railways were nationalised it would be better (although I recognise that's not really BDC's problem!)	Noted.
T8	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Use of public transport services depends on number of elements: <ul style="list-style-type: none"> <li>• Destinations served – do they link to key employment, shopping, leisure and education opportunities;</li> <li>• Frequency – high frequency services are likely to encourage more travel by this mode. CIHT and Stagecoach bus design guidance suggests that generally residents may be willing to walk slightly further for a high frequency public transport service.</li> <li>• Are fares reasonably priced, particularly in comparison to car parking charges?</li> <li>• Is sufficient information available – up-to-date timetables available at stops, online information easily accessible;</li> <li>• Waiting facilities – these should be high quality, with shelters and seating at popular stops, with real time information where available.</li> </ul>	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	What is likely to increase the use of public transport is lower prices and increased frequency/capacity of service, together with a fair pricing strategy to reduce car use, unless it they are electric/hybrids.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	113	Gareth	Sibley	RCA Regeneration	CAD Square	What is likely to increase the use of public transport is lower prices and increased frequency/capacity of service, together with a fair pricing strategy to reduce car use, unless it they are electric/hybrids.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	146	Charlotte	Quirck			Improved rail services (aware of proposal for parking at Wythall)	Noted.
T8	146	Charlotte	Quirck			Public transport needs improvement if we are to use the car less	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	159	Howard	Allen			Bus services are woeful. Bromsgrove is a car-centric authority. The public are forced to use the car by default because of the woeful bus services.  We can't get to or from Redditch or Birmingham (the nearest towns/cities) by bus after around 18:00 and not at all on a Sunday.  A few hundred thousand pounds spent on bus services rather than the millions on roads would have a far better outcome in terms of congestion and air quality.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	165	Johanna	Wood			-Shuttle buses from the train station into town - Free parking at park and ride - Frequent and cost efficient buses -Congestion charges in cities	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	173	Mary	Rowlands			There is a need for an affordable, integrated transport system to discourage travel by car.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	174	Michael	Corfield			Improved and increased car parking at all train stations.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	175	Michael	Waters			If we want to encourage people to use buses rather than cars then it is vital to upgrade the run down and shabby Bromsgrove bus station.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.

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T8	176	Mr & Mrs J D	Winslow			Using public transport is not an option in many rural areas with sparse and scattered populations since bus routes are absent because they lack economic viability. A customer would expect any service to be frequent, regular and, ideally, well integrated with a rail system. Town bus routes terminating at the recently updated Bromsgrove railway station, where there are swift and frequent trains into Birmingham, offer an alternative to the use of the private car. The provision of affordable parking also encourages a shift from longer car journeys along congested roads so that the negative impact of the private car may be further reduced.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	192			Dodford with Grafton Parish Council		As well as the trains, a regular bus service through the small villages would help reduce the need for cars. In other parts of the world, agencies such as the Post Office, who are obliged to visit the far-flung locations, offer public transport as an adjunct to the 'normal' services, and initiatives such as these could be considered. The reduction in banks and local post offices are a concern. Dedicated cycle paths from the villages into Bromsgrove would also encourage fewer car journeys. There are no cycle lanes at present, but the number of cyclists is increasing and could increase again if some dedicated lanes were installed.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
T8	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		Major problem with car parking at the rail station. There is a problem in that the extension of the Hagley station car park may threaten the Playing Fields area but with careful design some additional parking spaces could be provided.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
T8	194	Darren	Oakley	RPS	Clients	It is equally significant to recognise the contribution that new development can make to improving usage, and thus the future viability, of the network. This could be achieved, for instance, by locating new development adjacent to settlements in close proximity to road and public transport infrastructure (i.e. to increase current rail usage from 4%). Furthermore, locating future development adjacent to settlements offering a range of employment, retail and community facilities would clearly provide opportunities to encourage greater levels of walking and cycling for more local, short distance journeys.  Such considerations should form a key part of any assessment concerning the selection and potential release of land for future development, whatever the current designation may be.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment and site selection process.
<b>Q.T9: What would encourage you to walk or cycle more as opposed to travelling by car, especially for shorter journeys in and around Bromsgrove Town and the District's larger villages?</b>							
T9	1	Tammy	Williams	Alvechurch Parish Council		Having designated cycle ways incorporated into highway footways that connect smaller settlements to larger ones and especially taking schools into their routes would encourage more cycling and walking. If road widths mean a dedicated cycleway is not practical, then conversion of footways into dual-use footway/cycleway should be considered and explicitly funded	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
T9	2	Gill	Lungley	Barnt Green Parish Council		Covered cycle racks at shops and railway stations would encourage more cycling. Banning cars from parking on pavements would facilitate walking.	Noted.
T9	4	Barry	Spence	Bentley Pouncefoot Parish Council		More cycle lanes and restrictions on traffic, particularly heavy traffic. More speed restrictions in on rural lanes.	Noted
T9	9	Alexandra	Burke	Hagley Parish Council		Walking and cycling are to be encouraged but will probably only be used within a 5 or 10 minute isochrones.	Noted
T9	13			Natural England		New developments should be located and designed to maximise walking and cycling. Higher density, mixed use developments can reduce the need to travel by car. Consideration should be given to the creation of safe and attractive off-road routes, integrated into the wider green infrastructure network. The Sustrans website could be a useful source of information.	Noted.
T9	20	P	Harrison	Wythall Parish Council		Nothing would encourage me to cycle as the roads are dangerous and polluted.	Noted.
T9	28	Emily	Barker	Worcestershire County Council		- Clearly signposted and direct walking and cycling networks - A safe and accessible public realm	Noted.
T9	28	Emily	Barker	Worcestershire County Council		Increased traffic that will be generated from more housing can pose a safety problem. Safe cycling and walking routes should be created, linking housing developments to the town centre, schools and health facilities and allowing access to the open countryside. Routes must be surfaced and well lit.	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to link new development allocations with trip attractors such as schools and health facilities will be considered, particularly in respect of feasibility and viability.
T9	34	Sue	Baxter			Personally nothing, Cycle lanes, Less pollution, cycle charging points might help	Noted
T9	35	Peter	King	Campaign to Protect Rural England		Walking and cycling are of course to be supported, but we are unable to offer any particular suggestions.	Noted

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T9	42			Wythall Residents Association		The roads are dangerous and polluted and deter many people from taking up cycling. S106 agreements in Wythall were intended to improve cycling routes but these have never been pursued by the County Council.	Noted
T9	53	Gemma	Jackson	Claremont Planning	Mactaggart & Mickel Group	Exploitation of the existing transport network and infrastructure should be considered in the first instance, given that this will not require significant intervention and investment to expand the network to take in areas that are currently less accessible.	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town.
T9	72	Stephen	Peters			Nothing would encourage me to cycle as the roads are dangerous and polluted.	Noted
T9	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Based on Census 2011 data, only around 1% of people living within Bromsgrove district (including rural areas) cycle to work and 7% walk to work. This suggests considerable scope for increase in these modes, particularly given that 15% work within 2km of home (walking distance) and 28% within 5km of home (cycling distance). Measures that are likely to encourage travel by foot or bicycle include: <ul style="list-style-type: none"> <li>• Direct routes;</li> <li>• Safe crossing points over roads, including refuge islands, Puffin and Toucan crossings;</li> <li>• Clear wayfinding directions;</li> <li>• Well maintained routes, particularly for cycling;</li> <li>• Sufficient lighting to encourage use after dark;</li> <li>• Cycling routes that are segregated from traffic – these will appeal particularly to less confident cyclists as well as being suitable for children;</li> <li>• Secure cycle parking at destinations.</li> </ul>	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T9	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Encouraging walking and should focus on safety and the perception of safety, particularly during the winter months. Bromsgrove's outlying villages and the roads linking them to the town are often popular with cyclists during the weekend daytimes. However, for the purposes of commuting or educational trips during the am and pm peak, these routes can be considered dangerous for cyclists and pedestrians. Cycle routes that are appropriately signed, lined and lit are helpful, as are reduced speeds in and around the edges of settlements. Extending speed limits further out of settlements may assist with this.	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
T9	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of T9 to T11, encouraging walking and should focus on safety and the perception of safety, particularly during the winter months. Bromsgrove's outlying villages and the roads linking them to the town are often popular with cyclists during the weekend daytimes. However, for the purposes of commuting or educational trips during the am and pm peak, these routes can be considered dangerous for cyclists and pedestrians.	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
T9	112	Gareth	Sibley	RCA Regeneration	Piper Group	Encouraging walking should focus on safety. Cycle routes that are appropriately lined and signed and lit are helpful and reduced speeds around settlements. Outlying villages would benefit from improvements to their routes into Bromsgrove.	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
T9	113	Gareth	Sibley	RCA Regeneration	CAD Square	Encouraging walking and should focus on safety and the perception of safety, particularly during the winter months.	Noted.
T9	137	Matthew	Fox	Turley	Redrow Homes	It is important that new housing is located as close as possible to existing settlement centres and on public transport corridors, in order to encourage walking and cycling. As an example, the land to the south of Catshill at Washingstocks Farm is accessible by walking and cycling to the settlement's key facilities and Bromsgrove, and benefits from regular bus services on Stourbridge Road linking key settlements.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T9	165	Johanna	Wood			Cycle Lanes that address current safety issues. Cycle parks However, living on the Lickey Hills does require a lot of physical hard work if not in a car.	Noted.
T9	192			Dodford with Grafton Parish Council		As well as the trains, a regular bus service through the small villages would help reduce the need for cars. In other parts of the world, agencies such as the Post Office, who are obliged to visit the far-flung locations, offer public transport as an adjunct to the 'normal' services, and initiatives such as these could be considered. The reduction in banks and local post offices are a concern. Dedicated cycle paths from the villages into Bromsgrove would also encourage fewer car journeys. There are no cycle lanes at present, but the number of cyclists is increasing and could increase again if some dedicated lanes were installed.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.

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T9	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		Problems with state of repair of footways, currently completing a village wide Footway Survey. Particularly concerned due to the rising ageing population which is in danger of social isolation unless they are encouraged to walk into the village to use the facilities.	Noted.
<b>Q.T10: Are there any areas of the District you think would benefit most from potential funding sources to deliver new walking and cycling routes?</b>							
T10	1	Tammy	Williams	Alvechurch Parish Council		Yes on the roadside footways between Hopwood and Alvechurch	Noted. New infrastructure is likely to be most suitably located and most viable where it can support and mitigate new developments proposed in the District Plan Review.
T10	4	Barry	Spence	Bentley Pouncefoot Parish Council		Better routes to the station might encourage more people to use the train services.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T10	15	Fiona	McIntosh	North Worcestershire Water Management		There are opportunities to improve walking and cycling routes between Bromsgrove Town Centre and Sanders Park through naturalisation and enhancement of the Spadesbourne Brook - especially near the bus station and to the rear of the High Street. There are likely to be other similar opportunities throughout the District.	Noted.
T10	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Cycle routes that are appropriately signed, lined and lit are helpful, as are reduced speeds in and around the edges of settlements. Extending speed limits further out of settlements may assist with this.	Noted. The issue of speed limits is a detailed consideration for WCC Highways / WM Police and would be considered later in the planning process than the plan-making stage.
T10	113	Gareth	Sibley	RCA Regeneration	CAD Square	Bromsgrove's outlying villages and the roads linking them to the town are often popular with cyclists during the weekend daytimes. However, for the purposes of commuting or educational trips during the am and pm peak, these routes can be considered dangerous for cyclists and pedestrians. Cycle routes that are appropriately signed, lined and lit are helpful, as are reduced speeds in and around the edges of settlements. Outlying villages such as Stoke Prior would benefit from improvements to their routes into Bromsgrove, in terms of reducing speeds, creating cycle lanes and providing some lighting. Extending speed limits further out of settlements may assist with this.	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
T10	120	Michael	Davies	Savills	Cala Homes	Old Birmingham Road, Rose Hill and Lickey Road would benefit from funding to deliver new walking and cycling routes.	Noted. New infrastructure is likely to be most suitably located and most viable where it can support and mitigate new developments proposed in the District Plan Review.
T10	122	Michael	Davies	Savills	Landowners	We consider that Woodrow Lane, Halesowen Road would benefit from funding to deliver new walking and cycling routes. This area is sustainable and lies in close proximity to the Birmingham district boundary.	Noted. New infrastructure is likely to be most suitably located and most viable where it can support and mitigate new developments proposed in the District Plan Review.
T10	123	Michael	Burrows	Savills	Landowners	It is considered that the existing large settlement of Alvechurch would benefit from further funding to deliver new and improved walking and cycling routes, in particular along the Birmingham Road and also along Radford Road. This area is sustainable and lies in close proximity to the Birmingham district boundary.	Noted. New infrastructure is likely to be most suitably located and most viable where it can support and mitigate new developments proposed in the District Plan Review.
T10	165	Johanna	Wood			The larger housing developments and anything that improves links between and to the train and bus depots for cyclists and pedestrians	Noted. New infrastructure is likely to be most suitably located and most viable where it can support and mitigate new developments proposed in the District Plan Review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T10	166	John	Gerner			All parts of the Bromsgrove urban area	Noted. New infrastructure is likely to be most suitably located and most viable where it can support and mitigate new developments proposed in the District Plan Review.
T10	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		Hagley has very few cycling routes, wish to encourage cycling.	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
<b>Q.T11: Are there any areas of the District where funding sources could help fund the improvement of any existing walking or cycling routes?</b>							
T11	1	Tammy	Williams	Alvechurch Parish Council		Existing walking or cycling routes along the Worcester Birmingham canal could be improved through funding.	Noted. The Canal and River Trust are a consultee for the District Plan Review and BDC would expect the organisation to advise on the impact of proposals within the plan on the local canal network, and any plans for future improvements to the network.

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T11	4	Barry	Spence	Bentley Pauncefoot Parish Council		Provision of cycle lanes and maintenance of those routes might encourage more to use them, e.g. routes from the Stoke Prior Business parks to the nearby residential areas. Provision of more secure cycle storage at strategic places (e.g. the station) would help, as would secure cycle storage on new developments. The lanes forming part of National Cycle Route 5 and associated lanes would benefit from reduced speed limits thereby improving safety, and also better maintained surfaces (so that cyclists could ride at the edge of the lane instead of in the middle).	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
T11	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Outlying villages such as Fairfield would benefit from improvements to their routes into Bromsgrove, in terms of reducing speeds, creating cycle lanes and providing some lighting.	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
T11	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Outlying villages such as Romsley would benefit from improvements to their routes into Bromsgrove, in terms of reducing speeds, creating cycle lanes and providing some lighting.	Noted. Recent funding through the National Productivity Investment Fund (NPIF) was secured by WCC Highways to improve walking and cycling infrastructure in proximity to the A38 and Bromsgrove town; expanding the coverage of new cycling/walking infrastructure to outlying villages to improve options for sustainable transport will need to be considered in the plan, particularly in respect of feasibility and viability.
T11	165	Johanna	Wood			Even as a keen cyclist, I am not aware of any existing walking or cycling routes in the district other than the National Cycle Route 5.	Noted.
<b>Q.T12: Do you think there are any transport issues that we have missed? If so, please tell us what they are?</b>							
T12	1	Tammy	Williams	Alvechurch Parish Council		Electric powered vehicles and charging points need to be considered, as current trends favour sustainable methods of transport. Closer working with the County Council and local Police to clamp down on inconsiderate and illegal parking ....and, by implementing 20mph areas and other methods, better management of vehicle speeds to help road safety	Noted. The use of electric vehicles and associated infrastructure required to support these will be considered in the plan review and may be appropriate for inclusion within site allocation policies (for example, charging points in new developments) or a specific policy concerning this topic. Legal issues concerning parking and speed limits are outside of the scope of this plan, however as development proposals progress to planning applications they will need to adhere to relevant standards, guidance or policy concerning, for example, car parking provision.
T12	2	Gill	Lungley	Barnt Green Parish Council		Yes. Rail connectivity to the south west is paramount. Residents of Bromsgrove, Barnt Green and Alvechurch (+ Redditch) need to be able to access Worcester Parkway and Cheltenham without travelling into Birmingham first. Also, rail timetabling needs improving from Redditch, Alvechurch and Barnt Green so there is not a 47 minute wait at Bromsgrove when travelling to Worcester. These constraints make jumping in the car the obvious way to travel which should not be the case when the infrastructure is there.	Noted. The District Council will continue to work with and consult the rail industry, including through dialogue with WCC colleagues responsible for sustainable transport planning, in respect of the impacts of any plan review proposals on rail services and future planned improvements.
T12	4	Barry	Spence	Bentley Pauncefoot Parish Council		Major problems are caused when either of the motorways is closed or congested and traffic diverted off onto our local road network. Perhaps liaison with the Highways agency should be improved?	Noted. Highways England are a statutory consultee for the plan review and the District Council also hold regular meetings with this organisation to address issues concerning the strategic road network (Highways England controlled roads, such as motorways).
T12	9	Alexandra	Burke	Hagley Parish Council		No development should be allowed in Hagley until a satisfactory solution is provided to congestion on A456, part of which is the busiest A Class road in Worcestershire.	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed and mitigate impacts where appropriate.

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T12	10	Patricia	Dray	Highways England		<p>As noted above, Highways England has made an initial assessment of the SRN implications of the development options proposed by the Council at this stage of plan development. This initial assessment indicates that routing high volumes of development traffic through M42 junction 1 and M5 junction 4 would require significant SRN related mitigation. In this context development option 1 is not supported, excepting that some development in the immediate vicinity of Bromsgrove railway station could take advantage of the newly enhanced train service there. Option 2 indicates a high level of development trips at all SRN junction, except M5 junction 5. This spread of trips may make an effective and prioritised programme of mitigation measures challenging to develop. Option 3 has a higher level of trip generation due to nature of the development locations proposed. That said, this option does allow concentration of SRN impacts on M5 junction 4 and possibly M42 junctions 1 and 2. In turn this suggests that an effective scheme of mitigation at each junction could be developed. Option 4 due its dispersed nature shows notable impacts at all SRN junction and assuming some development on the fringes of Bromsgrove shows adverse impacts at M42 junction 1 which would require mitigation. Option 5 shows a high level of impact M5 junction 4. Some issues are also likely at M42 junction 1. Option 6 gives rise to large traffic impacts at M42 junctions 2 and 3. Option 7 has the potential to concentrate impacts at specific SRN junctions due the location of development proposed. This would make SRN mitigation more focused at a specific location and be more capable of being delivered by a suitably master-planned single site. In terms of preference for a particular location in transport terms much would turn on the ability to provide a suitable level of public and sustainable travel. Option 8 again gives rise to large traffic impacts at M42 junctions 2 and 3. Option 9 raises the same issues as for option 1 but with a further notable impact on M5 junction 4. We would note that whilst the above commentary provides an initial indication of likely SRN traffic effects it is not sufficient to fully inform the necessary decisions as to detailed questions of location and level of growth but does indicate the basis for the responses we have given in respect of the consultation questions, above.</p>	Noted. The District Council is happy to continue dialogue with Highways England as the plan review progresses, especially to aid a robust site selection process which will inform a preferred option for the plan.
T12	15	Fiona	McIntosh	North Worcestershire Water Management		<p>There can be a direct link between flood risk and transport/congestion issues. Would welcome the opportunity to share knowledge on highway locations at risk of flooding, or where working in partnership with Highways/HE could help alleviate flood risk. Example of this is the A38 near to Morrisons which regularly floods due to capacity issues with the sewer network and treatment works; if such a flood occurs while the motorway is closed, there could be significant wider impacts.</p>	Noted. Further evidence concerning flood risk will be required to support the plan review and the District Council will be happy to continue dialogue on these issues as the plan/evidence base progresses.
T12	17	Stuart	Morgans	Sport England		<p>Sport England supports the emphasis in paragraph 7.5 to promoting greater provision of walking and cycling options as alternative more sustainable modes of transport, and also the reference to providing recreational opportunities for local communities. The benefits of Active Travel could be more clearly referenced here, linking this to the Vision of creating healthy communities. Sport England provides guidance on Active Design, of which Active Travel forms part, and it would be beneficial for the Local Plan Review to reference this guidance in promoting walking and cycling within Bromsgrove and to apply the guidance accordingly.</p>	Noted. As the plan progresses to a preferred option, any policies that are developed in relation to walking and cycling will more clearly reference 'Active Travel' and cross-refer to the benefits of walking and cycling in creating healthy communities. Cross reference will also be made to the strategic objectives SO6 and SO7, which may be further developed as the plan progresses.
T12	29	Daniel	Atiyah	Wyre Forest District Council		<p>The council welcomes the recent development of the new Bromsgrove railway station and increase in service capacity. Bromsgrove is also being considered for a new park and ride location according to the Transport for West Midlands's 2026 Delivery Plan for Transport. The new rapid bus Sprint service will also be running to Longbridge, which borders the district. These investments will be promoting sustainable transport as outlined in section 9 of the NPPF.</p>	Noted. The Council are open to exploring opportunities for sustainable transport provision in order to meet the aspiration set out in strategic objective SO6.
T12	31	Rachel	Jones	Better Environment Theme Group		<ul style="list-style-type: none"> <li>•Lack of EV change points</li> <li>•Use of Electric vehicles for bin lorries/buses</li> <li>•Infrastructure improvements and educational programmes to encourage other modes of transportation such as cycling and walking</li> </ul>	Noted. The use of electric vehicles and associated infrastructure required to support these will be considered in the plan review and may be appropriate for inclusion within site allocation policies (for example, charging points in new developments) or a specific policy concerning this topic.
T12	33	Steve	Colella	District Councillor		<p>The WFDC Development Plan is promoting significant development along Lea Castle and Husum Way, all with directional travel to work, leisure and essential amenities and services along the A456 and A491 through Hagley. The prospect of additional traffic is significant and an issue that cannot be ignored by planning authorities or ultimately the Planning Inspector. Finding a way of by-passing Hagley and finding a way of getting current and new development from Wyre Forest into and out of the surrounding MUAs should be the primary focus for both District and WCC strategic planners, as the situation stands today.</p>	Noted. BDC will continue to engage with both WFDC and WCC through the duty to cooperate as the WFDC Local Plan progresses. BDC's representation (Dec 2018) to WFDC's initial pre-submission consultation raised an objection concerning additional traffic movements generated from new allocations on the eastern side of Kidderminster and the subsequent impact that the plan acknowledges this will have on Hagley and the A456. Discussions around these issues are still continuing as WFDC progress to a revised pre-submission consultation document in September 2019.



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T12	34	Sue	Baxter			Need for community transport specially for the infirm and elderly, help to combat loneliness	Noted. WCC as the highways authority for the district have a statutory duty to have regard to the needs of different sections of the community, including the elderly/infirm, in planning for the provision of sustainable transport across the county. The District Council will continue to work with WCC on the transport evidence base and through the duty to cooperate to inform the proposals within the plan review.
T12	40	Fraser	Pithie	Shakespeare Line Promotion group		we strongly support the statement within 7.21 of the Draft Plan Review	Noted.
T12	40	Fraser	Pithie	Shakespeare Line Promotion group		SLPG believe that the BDPR and the planning policies of adjacent local authorities must not be oblivious to the additional demand that will arise for transport connectivity, particularly to service home><employment journeys but also shopping and leisure too and the opportunity that new development provides to finance upgraded infrastructure required to meet the needs of the local population and visitors and which is endorsed by several objectives in the BDPR. We believe it is better to look forward and determine a vision so funding, which is a crucial element in obtaining and securing any infrastructure, is locked into planning approvals for further development. Our view is that only by following this approach can the local community secure the necessary infrastructure to ensure the continued amenity that everyone wants for the existing community while absorbing the pressure and need to accept further housing.	Noted. A strategic transport assessment for the district will be an important piece of evidence to inform the scale and location of development proposals in the Plan Review. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment. The infrastructure requirements to support the Plan Review, including indicative costings and source(s) of funding, will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T12	40	Fraser	Pithie	Shakespeare Line Promotion group		Crucially, both proposals would facilitate car parking enabling much greater use of the railway service from and to Wythall from the wider area of Wythall and Hollywood. This would also relieve some pressure from the oversubscribed Whitlocks End station (which SLPG are pressing WMRE to expand). SLPG emphasises that all of the above are options and it will be the Bromsgrove District Plan Review that will ultimately determine the direction and likelihood of any of the options above or that no action is taken.	
T12	40	Fraser	Pithie	Shakespeare Line Promotion group		In the event of a new purpose built Wythall Railway Station being constructed the existing Wythall railway station, along with Earlswood railway station, should be closed. A new station would still be within walking distance for pedestrians and would also have the potential to provide a transport interchange with local buses including an off-road bus stop and taxi drop off area both of which are not currently available.	
T12	40	Fraser	Pithie	Shakespeare Line Promotion group		If car parking as set out above adjacent to the existing railway station cannot be achieved then an alternative site should be proposed from land where a housing development allocation is approved that would provide for a new purpose built railway station. SLPG suggest such a site should be approximately some 300/400 metres south of the existing railway station and which should provide around 200/250 car parking spaces. We would expect the financing of this to come partly from each allocation of land designated for development within the revised District Plan for the areas of Wythall and Hollywood plus other agencies potentially such as Midlands Connect, Train Operators and LEP's.	
T12	40	Fraser	Pithie	Shakespeare Line Promotion group		That funding for a car park adjacent to the existing railway station of between 200/250 spaces be provided by an equitable financial charge upon the developers from each allocation of land designated for development within the BDPR and for the areas of Wythall and Hollywood.	
T12	40	Fraser	Pithie	Shakespeare Line Promotion group		Consequently SLPG request the BDPR ensures: • Any future housing development in the Wythall and Hollywood areas of Bromsgrove District should be subject to financial support being made by developers towards improving the railway as the most sustainable existing transport service and infrastructure.	
T12	40	Fraser	Pithie	Shakespeare Line Promotion group		SLPG wishes to emphasise its support towards the views expressed in 7.6 of the Bromsgrove District Plan Review	Noted.
T12	41	Helen	Davies	Transport for West Midlands		A number of KRN routes fall within or close by Bromsgrove District Council including the A456, A458, A491, A38, A441 and A435. We believe working closely with us as a key development partner will be paramount, especially if development is to take place on the edge of the conurbation. TfWM should be considered as an important consultee in development management phase of development and collaborative working will ensure mitigation is appropriately coordinated with other delivery partners and schemes, to fully commensurate with the region's wider delivery plans. It is also important to highlight the work of TfWM's Network Resilience Team to ensure that people are provided with discounted ticketing and public transport information from the onset of any major development. The importance of TfWM working with developers, as part of the wider public transport offer will also be vital.	Noted. BDC are happy to work with TfWM, including through collaboration with WCC as the highways authority for Bromsgrove District, on the impact of proposals both within Bromsgrove District and neighbouring authorities on the major road network.



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T12	78	Sean	Rooney	Harris Lamb	Barratt Homes	Overcrowding on the Bromsgrove to Birmingham train line could be eased by additional trains and services in the peak hours. In doing so this may make travelling to Birmingham more appealing to users and increase patronage.	The extension of the 'cross-city' line in 2018 increased the frequency of services from Bromsgrove to Birmingham, including stations between to the south-west of the city centre. At peak time, there are now five services per hour (three of which are cross-city) between Bromsgrove and Birmingham New Street.
T12	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Overcrowding on the Bromsgrove-Birmingham train line could be eased through additional trains and services in the peak hours. This may make train travel more appealing to users and increase patronage.	The extension of the 'cross-city' line in 2018 increased the frequency of services from Bromsgrove to Birmingham, including stations between to the south-west of the city centre. At peak time, there are now five services per hour (three of which are cross-city) between Bromsgrove and Birmingham New Street.
T12	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Overcrowding on the Bromsgrove to Birmingham train line could be eased through additional trains and services in the peak hours. In doing so, this may make train travel to central Birmingham more appealing to users and increase patronage.	The extension of the 'cross-city' line in 2018 increased the frequency of services from Bromsgrove to Birmingham, including stations between to the south-west of the city centre. At peak time, there are now five services per hour (three of which are cross-city) between Bromsgrove and Birmingham New Street.
T12	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Overcrowding on the Bromsgrove to Birmingham train line could be addressed through additional service provision.	The extension of the 'cross-city' line in 2018 increased the frequency of services from Bromsgrove to Birmingham, including stations between to the south-west of the city centre. At peak time, there are now five services per hour (three of which are cross-city) between Bromsgrove and Birmingham New Street.
T12	89	Reuben	Bellamy	Lone Star Land	Cleint	<p>The Issues and Options paper accepts that Green Belt land will need to be released. Paragraph 138 of the NPPF states that: "Where it has been concluded that it is necessary to release Green Belt land for development, plans should first give consideration to land which has been previously developed and/or is well served by public transport.."</p> <p>In order to achieve this policy aim it is clear that for Bromsgrove District transport corridors must mean the existing rail transport corridors. Bus patronage is declining while rail patronage is increasing.</p>	Noted. Strategic Objective SO6 is a key objective for the plan, which seeks to encourage a modal shift in transport usage to more sustainable forms such as rail.
T12	96			Nigel Gough Associates	Mr Stapleton	Do not wish to comment on this section, except to say that our client site is extremely well located and highly sustainable.	Noted.
T12	124	Robert	Lofthouse	Savills	Taylor Wimpey	<p>The planning application for the Perryfields development has exposed the lack of a joined-up approach to infrastructure delivery to support existing planned development, let alone future development. The importance of using an Infrastructure Delivery Plan (IDP) and the role of the Council to identify and coordinate the delivery of necessary infrastructure works and improvements to support future growth cannot be understated.</p> <p>We would expect the Council to have regard to the comprehensive delivery of highways improvements, through the IDP (to which the Perryfields development will contribute significantly) and to use this District Plan Review process as an opportunity to consider how these can be funded.</p>	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T12	146	Charlotte	Quirck			One of the options was to move the station [Wythall?] The feasibility of extending the platform at Wythall Station rather than move the whole station.	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
T12	147	Chris	Miall		Self	I am disappointed that there is no mention of the likely rapid shift toward both autonomous vehicles, and to electric cars - to which the Government is already committed. Bromsgrove needs to urgently consider how to provide the infrastructure to support widespread electric vehicle charging. It also ought to consider the impact of autonomous vehicles. This will reduce the number of privately owned cars, and that in turn will reduce the total number of vehicles on roads. But it will need clever and popular solutions to ensure shared cars are easily accessible.	Noted. The use of electric vehicles and associated infrastructure required to support these will be considered in the plan review and may be appropriate for inclusion within site allocation policies (for example, charging points in new developments) or a specific policy concerning this topic.
T12	148	Christine	Thomas		Self	The local 'bus service is minimal. To prevent traffic congestion in the village and to provide good access for local people this would need vastly improving.	Noted. The promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment.
T12	156	Fred	Carter			Public Transport should be linked to the West Midlands "Swift Card" system to enable more cost-effective transport to areas other than Birmingham New Street. Bus and train services should run at later times during the week and not effectively close down around 8pm.	Noted. Some of these issues are commercial operator decisions and are outside the scope of the planning system. However the overall promotion and use of sustainable modes of transport, including interconnectivity/accessibility to these modes, will be a key issue to be considered in the Strategic Transport Assessment. BDC are happy to work with Transport for West Midlands (TfWM), including through collaboration with WCC as the transport authority for Bromsgrove District, around cross-boundary transport issues between Bromsgrove and neighbouring local authorities.

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TC1	1	Tammy	Williams	Alvechurch Parish Council		There is scope for improvements, including for the encouragement of variety in small retail outlets	Comments noted. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWedR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres. Through the local plan review and evidence base we will establish what the need is for the Town Centre.
TC1	2	Gill	Lungley	Barnt Green Parish Council		The range and quality of facilities in Bromsgrove is not attractive. Parking fees act as a deterrent.	Comments noted. Retail choice is driven by the current market which is an issue facing Town Centres nationally. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWedR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres. Through the Local Plan Review and evidence gathering we will be able to assess these issues.
TC1	4	Barry	Spence	Bentley Pouncefoot Parish Council		Bromsgrove offers a reasonable range of small to mid-sized shops and plenty of cafés and restaurants. We do not believe it can compete with larger centres such as Solihull and Worcester. It benefits from being compact and having fairly good access (both buses and car-parking).	Comments noted. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWedR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres. Through the local plan review and evidence base we will establish what the need is for the Town Centre which will hopefully improve it's vibrancy.
TC1	9	Alexandra	Burke	Hagley Parish Council		An appropriate strategy should be found for managing retail decline without throwing a large sum of Council Tax payers' money on it.	Comments noted. Retail choice is driven by the current market which is an issue facing Town Centres nationally. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWedR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres. Through the Local Plan Review and evidence gathering we will be able to assess these issues.
TC1	20	P	Harrison	Wythall Parish Council		The High Street shopping experience is mediocre with several void premises and too many fast food outlets.	The way we use High Streets has changed and the government is commented to helping High Streets evolve and adapt to this change. The NPPF and Local Planning policies will take a positive approach to Town Centres. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWEDR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres.
TC1	34	Sue	Baxter			No, it is easier to get to Solihull, Redditch and Birmingham than Bromsgrove from Wythall. If it wants to be the centre of activity for Bromsgrove District to needs to be accessible to all and worth the journey	Comments noted about accessibility to Bromsgrove from Wythall. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWedR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres.
TC1	35	Peter	King	Campaign to Protect Rural England		The present policies for the Town Centre rely far too much on nostalgia, looking back to a time when most A1 retail trade took place in town centres. The rise of out-of-town retail developments and then of on-line mail order shopping has changed that for ever. This means that there is little hope of reviving town centres.	The way we use High Streets has changed and the government is commented to helping High Streets evolve and adapt to this change. The NPPF and Local Planning policies will take a positive approach to Town Centres. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWedR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres.
TC1	42			Wythall Residents Association		The High Street shopping experience is mediocre with several void premises and too many fast food outlets.	Comments noted about accessibility to Bromsgrove from Wythall. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWedR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres.
TC1	70	Susan	Forrest			Smaller businesses and craft businesses should be encouraged.	Comments noted and they will be communicated to our Economic Regeneration Team (NWedR).
TC1	72	Stephen	Peters			The High Street shopping experience is mediocre with several void premises and too many fast food outlets.	Comments noted. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWedR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres. Through the local plan review and evidence base we will establish what the need is for the Town Centre and address is issues regarding A5 uses.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
TC1	98	Sally	Oldaker			<p>Where to start? There are a few nice shops now, but how long will they last? Rents are too high for many independent shops. Big names are unlikely to come to the high street because that's not the way people shop any more, so you really need to concentrate on making it a cute market town with unusual independent shops and do everything possible to attract and retain these. And, as many people have been saying in Bromsgrove for many years, you need to offer free or at least much cheaper parking! No wonder people go out of town to shopping malls and large superstores such as Longbridge and Merry Hill because you can park for free! You claim 'We need to encourage people to visit our Town Centre as a longer-stay destination rather than as a short-term convenience' - well, the cost of staying all day or even part of it is prohibitive.</p> <p>Also you need to sort out the general look of the town – I know you can't do much about the buildings that were allowed to be put up in the 60s, but surely you could give them a false facade that makes them look Georgian or something? And encourage or enforce shops and businesses to have their signage in keeping with the overall look, or even adhering to a certain style, so that we don't get lots of gaudy or tacky signs.</p> <p>And that new grey paving on the pedestrianised high street is awful and looks grubby already. The nice old red brick paving was so much more conducive to a quaint market town.</p>	Some of the historic buildings in the town have benefited from being part of the Townscape Heritage Initiative (THI) programme which has improved the High Street significantly. The Design SPD has specified that it will be paying close attention to the outside design of shops in the Town Centre such as signage schemes which will be enforceable when new planning applications are received. With regards to parking, this is managed by NWEDR and they have commissioned a car parking study which has identified that parking charges in Bromsgrove is cheap compared with neighbouring towns of a similar nature.
TC1	104	Richard	Fryer			<p>There obviously has been little interest investing in the area adjacent to Waitrose near to the Worcester Road junction. Is there an opportunity for funding to transform the area onto an open space for community events with seating and sustainable landscaping. A water feature would be a good addition and the area could host events which are currently cramped onto the high street such as festival and xmas activities. Other towns have regenerated their centres in this way which have proved a success.</p>	Comments noted. We will explore options for the future of the Town Centre through the Local Plan Review process. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWEDR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres.
TC1	159	Howard	Allen			<p>We live in Alvechurch.</p> <p>We never go to Bromsgrove.</p> <p>The nearest town centre (and the only one we are concerned about) is Redditch.</p> <p>As far as we are concerned money spent on Bromsgrove is a waste of our council tax.</p>	Comments noted. Bromsgrove Town Centre serves an important function for many residents in Bromsgrove. The smaller local centres around the district also provide essential local services. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWEDR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres. Through the local plan review and evidence base we will establish what the need is for residents in Bromsgrove District and encourage people to visit the Town.
TC1	165	Johanna	Wood			<p>I feel a lot more positive than I used to But.....</p> <p>- Far too many charity and coffee shops ( national and local) banks and too few local independent shops. Not enough being done to bring variety to the retail mix or using the buildings differently in a way that will attract people into the town. This is especially so when the town parking charges are a put off for many.</p> <p>Need to focus on bringing in new employment to revitalise daytime usage of the town which could stimulate the high street further.</p> <p>At the moment Bromsgrove is simply not a Go To Destination compared to other places relatively near by.</p>	Comments noted. Retail choice is driven by the current market which is an issue facing Town Centres nationally. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWEDR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres. Through the Local Plan Review and evidence gathering we will be able to assess these issues.
TC1	166	John	Gerner			<p>No, a broader profile of retailers is required</p>	Comments noted about accessibility to Bromsgrove from Wythall. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWEDR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres.
TC1	171	Mark	Cooper			<p>Not really. It always seem to feel like a condemned man waiting to go to the gallows. I always wonder which outlets will be closed next and which Charity Shop will be opening. Plus - I don't see a plan.</p>	The way we use High Streets has changed and the government is commented to helping High Streets evolve and adapt to this change. The NPPF and Local Planning policies will take a positive approach to Town Centres. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWEDR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres.
TC1	171	Mark	Cooper			<p>I walk along Bromsgrove town centre on a regular basis and it doesn't feel co-ordinated or to have a sense of purpose. It's basically a few charity shops (always a measure of a High Street's viability), mobile phone outlets, cafes, 3-4 Boots-style outlets, card shops, some smaller boutique shops and one or two pubs/restaurants. It needs more familiar High St names/brands to bring visitors in higher numbers, with the Council support to achieve this.</p> <p>Longbridge Village and the growth of large supermarkets such as Aldi and Lidl on the outskirts of the High Street and beyond are asking me to question "what am I going into Bromsgrove for? What do I need from the town that I can't get wider access to outside of it?" It feels like it's living on a knife-edge - each time I go into town I'm half expecting to see another closure. It could also do with a little tlc in places, it's looking quite run-down and dirty.</p>	Comments noted. Retail choice is driven by the current market which is an issue facing Town Centres nationally. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWEDR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres. Through the Local Plan Review and evidence gathering we will be able to assess these issues.

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TC1	177	Mr & Mrs D	Went			Old dolphin centre a 'Blot' on the landscape. The longer the council take to make a decision the more it will cost.  Site on the old Market site (Waitrose)- When will the development be finished? It is looking like an eyesore.	Comments noted. The council are still considering options for the Dolphin Centre site and the Market Hall site.
TC1	184	Nina and Ray	Read			The High Street is suffering from a lack of footfall, businesses are leaving shops empty, visitors are going to more accessible venues - not Bromsgrove. Downside: loss of income in terms of rates.	Comments noted. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWEDR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres. Through the local plan review and evidence base we will establish what the need is for the Town Centre.
TC1	192			Dodford with Grafton Parish Council		The centre of Bromsgrove is potentially very attractive, and the pedestrian high street, with its lively activities also appeals. There are too many charity and 'Poundland' type shops, so the balance of business rates and commercial activities probably needs to be rethought. The parking is expensive and inconvenient for short stay visits, fine for longer visits.	Comments noted. Unfortunately, the type of retail on offer in the Town centre is driven by the market. Charity shops are A1 Retail Use Class and controlling the type of retail uses on offer is not within the planning remit. The District Council in partnership with North Worcestershire Economic Development and Regeneration (NWEDR) has adopted a Centres Strategy with a key focus on identifying opportunities for Bromsgrove centres.
<b>Q.TC2: Do you think Bromsgrove town centre should be promoted for more retail, commercial and leisure, office/employment generating uses or residential led development?</b>							
TC2	1	Tammy	Williams	Alvechurch Parish Council		Promoting mixed use of Town Centre properties including residential would focus life around the centre	The way we use High Streets has changed and the government is committed to helping High Streets evolve and adapt to this change. Local Planning policies will take a positive approach to Town Centres partnership with North Worcestershire Economic Development and Regeneration (NWEDR)
TC2	4	Barry	Spence	Bentley Pauncefoot Parish Council		Allowing some residential development (e.g. above retail units) would bring more life to the town centre. We feel it unlikely to attract significantly more retail growth.	The way we use High Streets has changed and the government is committed to helping High Streets evolve and adapt to this change. Local Planning policies will take a positive approach to Town Centres partnership with North Worcestershire Economic Development and Regeneration (NWEDR)
TC2	17	Stuart	Morgans	Sport England		Sport England supports the provisions within the existing District Plan (notably policy BDP17.2.2) that promote Bromsgrove Town Centre as a suitable location for sports and leisure developments, and would encourage the District Plan Review to make the same supporting provision.	Comments of support noted.
TC2	17	Stuart	Morgans	Sport England		Location of sports and recreation uses within the town centre accords with Sport England's active design guidance, particularly in terms of promoting co-location of facilities in accessible locations to the local community. It also accords with the guidance in the NPPF as sport and recreation uses are included within the definition of "Main Town Centre Uses" for which the sequential test under paragraph 86 applies.	Comments of support noted.
TC2	20	P	Harrison	Wythall Parish Council		Mixed uses should be encouraged including town centre living.	The way we use High Streets has changed and the government is committed to helping High Streets evolve and adapt to this change. Local Planning policies will take a positive approach to Town Centres partnership with North Worcestershire Economic Development and Regeneration (NWEDR)
TC2	32	Robert	Spittle	Bromsgrove Economic Theme Group		If current shopping habits do not reverse and online habits increase there is no doubt the traditional High Street will continue to be under pressure. However, the town has to be consistent in its approach to the Districts centres and learn from more vibrant sectors. For example, there are a number of centres that do create prosperity, economic development and a community culture, Hagley, Barnt Green and Alvechurch do just this. They are accessible and promote short term shopping cultures, Bromsgrove town centre needs to follow this approach by managing parking charges but also by being relevant to the opportunity. The town needs to be commensurate in size to the short-term culture (of just popping to a pharmacy / having hair done / visiting and ironmonger) of things that cannot be done online! This focus will mean a reduction in size of the current centre, the residue needs to ensure adequate eateries and similar establishments for the Bromsgrove pound, with the remaining space being given to residential development.	Comments welcomed and noted. We will work in partnership with all stakeholders and NWEDR in establishing the right balance for Bromsgrove Town.
TC2	34	Sue	Baxter			I do not believe that Bromsgrove Town Centre serves a large enough catchment area to achieve sustainable retail aspirations, I believe mixed use residential, retail , business would be best	Comments noted.

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TC3	1	Tammy	Williams	Alvechurch Parish Council		Look to reducing Town Centre business rates and encouraging diverse outlets could regenerate the centre.	Comments noted. The District Council in partnership with NWeDR are focused on the High Street and ensuring a positive approach is applied to Town Centre regeneration in line with the National Planning Policy Framework.
TC3	4	Barry	Spence	Bentley Pauncefoot Parish Council		We support the policies in the Bromsgrove Town Centre Strategy.	Comments noted.
TC3	20	P	Harrison	Wythall Parish Council		It is delusional to think that retailers could be attracted to Windsor Street; the disused fire station complex should be considered for town centre living.  The growth in stores such as Aldi and Lidl and other low-cost outlets at the periphery of the town centre will only lead to greater decline along the High Street. Most shopping needs can be satisfied without ever visiting the town centre.	Comments noted. The way we use High Streets has changed and the government is committed to helping High Streets evolve and adapt to this change. Our Town Centre Health Checks monitor footfall in the Town Centre and this will be used as part of the evidence base to support the policies in the Local Plan Review.
TC3	34	Sue	Baxter			No Shopping needs can be without visiting Bromsgrove town centre.	Comments noted. The way we use High Streets has changed and the government is committed to helping High Streets evolve and adapt to this change. Our Town Centre Health Checks monitor footfall in the Town Centre and this will be used as part of the evidence base to support the policies in the Local Plan Review.
TC3	35	Peter	King	Campaign to Protect Rural England		The protected Primary Retail Frontage is too great and should be reduced to a much smaller core. There are only a handful of shops left in the Town Centre beyond the suggested smaller core. The policy should be to have a tightly drawn primary retail frontage, where as much of the frontage as possible is for retail only. However should be a much smaller area than in the present plan, probably only between New Road and Stratford Road. The objective in the remainder of the town centre should be to manage decline by encouraging other uses (Secondary Centre Uses): •Other A-class uses •Small professional offices in service sectors, including lawyers, estate agents, financial advisers and banks •Personal services, such as beauticians, tanning salons, nail bars, tattooing salons. Hairdressers are not mentioned here since they are anomalously an A1 use, though not actually retail. •“Evening economy” leisure uses, including coffee bars, restaurants, bars, night clubs •Medical practices, such as doctors’ surgeries, dentists, physiotherapists, and alternative medicine. The clustering of such uses serves mutually to reinforce each other’s viability: a person who visits a dentist may at the same time do some shopping. On the other hand areas where “evening economy” uses are concentrated is unsuitable for housing, as people coming out of clubs at 2 or 3 am are liable to be boisterous in ways that are incompatible with the sleep of residents, who need to be up early for work the next morning. Nevertheless, there may be areas within Bromsgrove Town Centre, above or behind the shopping frontage that may be suitable for housing.	Comments noted. The way we use High Streets has changed and the government is committed to helping High Streets evolve and adapt to this change. Local Planning policies will take a positive approach to Town Centres partnership with North Worcestershire Economic Development and Regeneration (NWeDR).
TC3	42			Wythall Residents Association		It is delusional to think that retailers could be attracted to Windsor Street; the disused fire station complex should be considered for town centre living. The growth in stores such as Aldi and Lidl and other low-cost outlets at the periphery of the town centre will only lead to greater decline along the High Street. Most shopping needs can be satisfied without ever visiting the town centre.	Comments noted. The way we use High Streets has changed and the government is committed to helping High Streets evolve and adapt to this change. Our Town Centre Health Checks monitor footfall in the Town Centre and this will be used as part of the evidence base to support the policies in the Local Plan Review.
TC3	72	Stephen	Peters			It is delusional to think that retailers could be attracted to Windsor Street; the disused fire station complex should be considered for town centre living. The growth in stores such as Aldi and Lidl and other low-cost outlets at the periphery of the town centre will only lead to greater decline along the High Street. Most shopping needs can be satisfied without ever visiting the town centre.	Comments noted. The District Council in partnership with NWeDR are focused on the High Street and ensuring a positive approach is applied to Town Centre regeneration in line with the NPPF.
TC3	98	Sally	Oldaker			Nope. See above.	Comments noted. The updated policies through the Local Plan review process will allow for more flexibility in line with the NPPF.
TC3	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	The fall in vacancies, together with continued investment shows that policies are working; however more can be done in promoting the re-use of empty space in existing buildings for productive use of all sorts, bolstered by new residential led development around the Centre.	The way we use High Streets has changed and the government is commented to helping High Streets evolve and adapt to this change. Local Planning policies will take a positive approach to Town Centres partnership with North Worcestershire Economic Development and Regeneration (NWeDR)
TC3	161	Ian	Macpherson		Self	May need specific policies for Bromsgrove Town Centre	Comments noted.
TC3	165	Johanna	Wood			To some extent - yes. But the change is very slow and more focus required on attracting quality retailers to the high street to help elevate Bromsgrove to a destination of choice	The way we use High Streets has changed and the government is commented to helping High Streets evolve and adapt to this change. Local Planning policies will take a positive approach to Town Centres partnership with North Worcestershire Economic Development and Regeneration (NWeDR)
TC3	166	John	Gerner			No	Comments noted.



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TC3	171	Mark	Cooper			No. In my opinion a Strategic Task Force needs to be established immediately to ensure the survival of the High Street.	Comments noted. The District Council in partnership with NWeDR are focused on the High Street and ensuring a positive approach is applied to Town Centre regeneration in line with the National Planning Policy Framework.
TC3	173	Mary	Rowlands			Areas of land are awaiting development after a long period. These should be addressed with greater urgency.	Comments noted. The council are still considering options for the Dolphin Centre site and the Market Hall site.
TC3	192			Dodford with Grafton Parish Council		The centre of Bromsgrove is potentially very attractive, and the pedestrian high street, with its lively activities also appeals. There are too many charity and 'Poundland' type shops, so the balance of business rates and commercial activities probably needs to be rethought. The parking is expensive and inconvenient for short stay visits, fine for longer visits.	The way we use High Streets has changed and the government is commented to helping High Streets evolve and adapt to this change. Local Planning policies will take a positive approach to Town Centres partnership with North Worcestershire Economic Development and Regeneration (NWeDR)
<b>Q.TC4: Do you think pedestrian priority, linkages and mobility within and across the town centre could be improved and also to the town centre from housing developments? If so, how?</b>							
TC4	1	Tammy	Williams	Alvechurch Parish Council		Pedestrian priority around the centre is welcome...but only if parking is adequate and its use encouraging.	Comments noted. The plan will consider pedestrian priority and parking in partnership with the County Council and NWeDR.
TC4	4	Barry	Spence	Bentley Pouncefoot Parish Council		We believe linkages could be improved. For example – the crossing at the junction of High Street/The Strand/Stratford Road is prioritised for traffic, leaving pedestrians little time to cross and long waits; there is no direct crossing from the Stourbridge Road car park to the busy doctors' surgery on Birmingham Road; crossing from the Argos store and the High Street shops is limited.	Comments noted.
TC4	20	P	Harrison	Wythall Parish Council		Only if traffic congestion can be alleviated. Pedestrians are forced to congregate at heavily polluted roadside to cross Market Street and pass the fume filled bus station with taxis and buses running their diesel engines.	Comments noted. Reducing congestion and encouraging sustainability was identified in the Sustainability Appraisal scoping report. Sustainability along with Health and wellbeing is an important consideration in the plan making process.
TC4	42			Wythall Residents Association		Only if traffic congestion can be alleviated. Pedestrians are forced to congregate at heavily polluted roadside to cross Market Street and pass the fume filled bus station with taxis and buses running their diesel engines.	Comments noted. Reducing congestion and encouraging sustainability was identified in the Sustainability Appraisal scoping report. Sustainability along with Health and wellbeing is an important consideration in the plan making process and will be considered in partnership with the County Council
TC4	72	Stephen	Peters			Only if traffic congestion can be alleviated. Pedestrians are forced to congregate at heavily polluted roadside to cross Market Street and pass the fume filled bus station with taxis and buses running their diesel engines.	Comments noted. Reducing congestion and encouraging sustainability was identified in the Sustainability Appraisal scoping report. Sustainability along with Health and wellbeing is an important consideration in the plan making process and will be considered in partnership with the County Council
TC4	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Improvements will be needed to the town centre from the proposed Bromsgrove Golf Centre residential development, although some improvements may be provided through the A38 corridor scheme. Key walking and cycling routes from this site are considered to be along the A38 and on Stratford Road towards the town centre. Stratford Road has good pedestrian provision but none for cyclists, and there is scope to provide an off-road shared cycleway/footpath along much of this route from the A38. Likewise, the existing footpath provision along the A38 between Slideslow Drive and the A448 would benefit from upgrading as part of a link towards the town centre. Safe crossing facilities over the A38 from the development site will need to be provided to complete the links towards the town centre, which could include a mixture of Toucan crossings and refuge islands.	Comments noted. Strategic Objective 6 identifies sustainability across the district and there is a need to actively encourage sustainability for the future and will be considered in partnership with the County Council.
TC4	165	Johanna	Wood			Within the town centre pedestrianisation is generally good. Can't comment on what it is like from the town centre to housing developments.	Comments noted.
TC4	166	John	Gerner			Yes, delays at light controlled pedestrian crossings frustrates and discourages walking. This can be resolved by replacing signal controlled crossings with zebra crossings. Crossing Windsor Street at the Stratford Road junction is hazardous. A pedestrian crossing is needed in the vicinity of the new retail park/football ground on Birmingham Road.	Comments noted. The plan will consider pedestrian priority and parking in partnership with the County Council and NWeDR.
TC4	171	Mark	Cooper			Happy at the present.	Comments noted.
TC4	192			Dodford with Grafton Parish Council		see comments in previous sections about the need for cycle paths, better bus services, and better access to the train station (with the implicit need to ensure affordable and reliable train services).	Comments noted. Strategic Objective 6 identifies sustainability across the district and there is a need to actively encourage sustainability for the future and will be considered in partnership with the County Council.
TC4	192			Dodford with Grafton Parish Council		Introduce some cycle routes.	Comments noted. Strategic Objective 6 identifies sustainability across the district and there is a need to actively encourage sustainability for the future and will be considered in partnership with the County Council.
<b>Q.TC5: Do you feel that the town centre is safe and accessible to all? Where do you feel improvements should be made?</b>							
TC5	1	Tammy	Williams	Alvechurch Parish Council		Feeling safe and accessible to all could be improved by an increase in CSO's and having regular police officer visibility	Comments noted. The plan will consider pedestrian priority and parking in partnership with West Mercia Police and our community safety team.



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TC5	4	Barry	Spence	Bentley Pauncefoot Parish Council		The centre is fairly accessible (except for the road crossings as commented on above).	Comments noted. This will be considered in partnership with the County Council and NWeDR as part of the plan making process.
TC5	18	Andrew	Morgan	Warwickshire and West Mercia Constabulary		WP and WMP note the aspiration of the Council to continue growing the evening and night-time economy in Bromsgrove town centre, as expressed by paragraph 8.7. The two Forces strongly recommend that the Council maintain the positive approach of the existing Bromsgrove District Plan 2011 – 2030 (adopted January 2017), which contain proactive policy (BDP17.2.2 (I)) and guidance (paragraphs 8.159-8.161) to manage the well-known negative side effects of such an economy. Unless this recommendation is adopted, a lack of good quality planning and subsequent follow-up active management after delivery simply equates to a rise in crime and anti-social behaviour levels in direct proportion to the increase in licensed premises. This in turn places excessive and sometimes unsustainable demands on the emergency services and local medical facilities. If this were to come to pass, it would be in contravention of Section 110 of the Localism Act and Section 17 of the Crime and Disorder Act 1998 (as amended by Schedule 9 of the Police and Justice Act 2006).	Comments noted and we will work closely with WMP and our community safety team to ensure that the negative side of growing the evening economy is addressed.
TC5	20	P	Harrison	Wythall Parish Council		More dropped kerbs need to be introduced along routes leading into the town centre.	Comments noted. This will be considered in partnership with the County Council and NWeDR as part of the plan making process.
TC5	28	Emily	Barker	Worcestershire County Council		- Centres should provide benches and sheltered bike storage	Comments noted. This will be considered in partnership with the County Council and NWeDR as part of the plan making process.
TC5	42			Wythall Residents Association		More dropped kerbs need to be introduced along routes leading into the town centre.	Comments noted. The plan will considered in partnership with the County Council and NWeDR as part of the plan making process.
TC5	70	Susan	Forrest			Car park charges are too high and discourage visitors.	NWeDR are producing a car parking study which will be investigating car parking in Bromsgrove.
TC5	72	Stephen	Peters			More dropped kerbs need to be introduced along routes leading into the town centre.	Comments noted. This will be considered in partnership with the County Council and NWeDR as part of the plan making process.
TC5	98	Sally	Oldaker			It would be more accessible if there was cheaper parking for all. In terms of safety, perhaps better lighting in alleyways.	Comments noted. The plan will consider parking & safety in partnership with West Mercia Police and our community safety team.
TC5	165	Johanna	Wood			Generally the Town Centre feels safe and accessible to all. At night this can sometimes change though mainly because of human behaviour rather than poor lighting or mobility / accessibility issues.	Comments noted.
TC5	165	Johanna	Wood			Town centre parking - both the availability and the conflict between high parking charges and wanting to attract more people to Bromsgrove. It seems that the Council views parking as key money stream hence the price of parking and the hours between which you have to pay. As for the number of parking spaces.....	Parking in Bromsgrove is being reviewed through the Parking Strategy.
TC5	171	Mark	Cooper			Yes.	Comment noted.
TC5	192			Dodford with Grafton Parish Council		see comments in previous sections about the need for cycle paths, better bus services, and better access to the train station (with the implicit need to ensure affordable and reliable train services).	Comments noted. Strategic Objective 6 identifies sustainability across the district and there is a need to actively encourage sustainability for the future and will be considered in partnership with the County Council.
<b>Q.TC6: Do you think we need to improve the general connectivity between Bromsgrove train station and the town centre? If so, how?</b>							
TC6	1	Tammy	Williams	Alvechurch Parish Council		Yes an improvement to the general connectivity between Bromsgrove Town train station and the Town Centre is definitely needed? Regular mini bus shuttle services with minimum fares could be the answer	Connectivity to the Town Centre was identified in the SA scoping report and will be considered as part of the plan making process.
TC6	2	Gill	Lungley	Barnt Green Parish Council		Yes. Connectivity between the new Bromsgrove railway station and the town centre should be enhanced with a shuttle bus that is timed to depart every 20 minutes just after the trains arrive from Birmingham. It should be free.	Connectivity to the Town Centre was identified in the SA scoping report and will be considered as part of the plan making process.
TC6	4	Barry	Spence	Bentley Pauncefoot Parish Council		The topography of the town does not encourage walking to & from the town centre and the station. That cannot be changed but better, more attractive crossing of the A38 may encourage more walkers to cross. At-grade crossings are now considered to be more successful than bridges or underpasses.	Comments noted. This will be considered in partnership with the County Council and NWeDR as part of the plan making process.
TC6	11	Rosamund	Worrall	Historic England		The issue of the connectivity between the town centre and the train station is of interest and we would be pleased to discuss any particular proposals as part of the Plan process. This links with the uncertainty highlighted in the SA Table NTS3 and indicates further work may be required as part of the Plan process e.g. creating a sense of arrival at Bromsgrove station, the possibilities for public realm improvements and enhancement of the quality of public space all of which could help conserve or enhance the historic environment as well as meeting other SA and Plan objectives.	Comments noted & connectivity into the Town was identified in the scoping report. We will work in partnership with our statutory consultees through the plan making process.
TC6	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		(revised)Lickey and Blackwell Parish Council have the view that Bromsgrove town centre should be regarded as being the hub for the whole district and therefore transport links should enable this more easily, however we note that larger settlements e.g.. Alvechurch, Hagley and Wythall have other towns nearby which are more likely to be used by residents than our own district town. If we want the district to use the town centre then we need to improve roads, parking and buses for Bromsgrove town centre.	Comments noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
TC6	20	P	Harrison	Wythall Parish Council		YES. The railway station and frequent electrified station are now a big plus point for the town and frequent bus links are required.	Comments noted.
TC6	34	Sue	Baxter			Yes. The railway station and frequent electrified station are now a big plus point for the town and frequent bus links are required.	Comments noted.
TC6	35	Peter	King	Campaign to Protect Rural England		It would of course be nice to increase connectivity between the Town Centre and the Station, but this is not really feasible. It might be possible to run a shuttle bus between them, but that would do no good. The chances of people coming to the town by rail to shop are negligible.	Comments noted.
TC6	42			Wythall Residents Association		Yes. The railway station and frequent electrified station are now a big plus point for the town and frequent bus links are required.	Comments noted.
TC6	72	Stephen	Peters			YES. The railway station and frequent electrified station are now a big plus point for the town and frequent bus links are required.	Comments noted.
TC6	98	Sally	Oldaker			Yes – people arrive in Aston Fields thinking they are in the town centre. Its needs better signage, and some joined-up thinking with buses to get to the centre. Maybe a shuttle?	Comments noted.
TC6	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	At present there is limited connectivity in terms of off-road cycle routes between the town centre and rail station, and the development of the Golf Centre site could enhance a town-wide network of off-road provision alongside any multi-modal improvements made as part of the A38 corridor project.	Comments noted.
TC6	165	Johanna	Wood			Definitely . could improve connectivity through introduction of Shuttle buses as well as better pedestrian priority and access	Comments noted.
TC6	166	John	Gerner			Yes, high frequency shuttle bus.	Comments noted.
TC6	171	Mark	Cooper			Yes, maybe more specific bus/rail links?	Comments noted.
TC6	180	Nicholas	Rands			No, people don't arrive at Bromsgrove Train Station to visit the Town Centre. However, if you create more residential accommodation in and around the Town Centre, the answer would be yes. Improvement to connectivity needs to be made between residential areas and the Train Station.	Connectivity to the Town Centre was identified in the SA scoping report and will be considered as part of the plan making process.
TC6	192			Dodford with Grafton Parish Council		see comments in previous sections about the need for cycle paths, better bus services, and better access to the train station (with the implicit need to ensure affordable and reliable train services).	Comments noted.
<b>Q.TC7: Do you think your local centre provides everything you need? If not, can you identify your local centre and tell us what you think it needs?</b>							
TC7	1	Tammy	Williams	Alvechurch Parish Council		Alvechurch village centre could be so much better through:- a. New development schemes close to the Alvechurch village should be encouraged to make contributions and cooperate with the principal Local Authorities in taking forward a centre community improvement scheme b. The village centre, even though The Precinct is of the 20th century, is part of the Conservation Area. It is intended therefore to keep signage in the village centre to simple design elements that blend in with the overall historic setting of the Conservation Area c. The character of Alvechurch Village should not be harmed by inappropriate street signage and lighting or excessive street furniture or business advertising d. Some provision should be made for landscaping including the additions communal seating, areas of greenery and some trees e. Better pedestrian access and pathways will be sought including appropriate provision for disabled people, in particular a crossing point between the medical centre and the Square area f. Improvements that include improved access for cyclists and storage for bicycles will be sought at key village locations such as at, the village Precinct, The Square and at the railway station g. Measures that help improve existing parking in and near the village centre for its immediate residents and for centre users will be explored in conjunction with WCC Highways and local businesses. h. Some engineering solutions to raise road sections with areas of sets and cobbles that highlight the need for vehicles to drive slowly.	Comments noted and welcomed that Alvechurch would benefit from centre improvements. This will be considered in partnership with NWeDR as part of the plan making process.
TC7	2	Gill	Lungley	Barnt Green Parish Council		Yes. Barnt Green has above average facilities.	Comments noted.
TC7	4	Barry	Spence	Bentley Pauncefoot Parish Council		Bentley residents generally do not frequent the centres named in the documents with the exception of Aston Fields. This centre is attractive and popular.	Comments noted that Aston Fields is more likely to be used by residents in Bentley and this will be considered in the plan making process.
TC7	9	Alexandra	Burke	Hagley Parish Council		Need to have a Local Centre boundary in which A1 retail and the other secondary centre uses listed under Q.TC.1 are encouraged and housing discouraged, except as a policy of shrinking the core. Where there is a Neighbourhood Plan the boundaries of the local centre should be fixed by the NP, elsewhere by the Plan as a non strategic policy.	Comments noted. Local centre boundaries can only be altered through the local plan process and supported by a robust. evidence base. Through positive engagement with Parish Councils & NP groups we can work together in shaping future local centre policies & any changes to boundaries.

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TC8	4	Barry	Spence	Bentley Pauncefoot Parish Council		It appears that large numbers of people using the station avoid charges at the station car park by parking on Brene Park and other on street parking places (e.g. St. Godwald's Road, South Road). Could measures be put in place to limit parking in these areas in order to improve life for the residents? Re: Aston Fields – one issue here is the traffic problems caused when deliveries are being made especially to the CO-OP. There is conflict between through traffic, parked cars and deliveries. No doubt similar problems exist at other local centres	Comments noted and they will be considered through the plan making process and in partnership with the County Council.
TC8	11	Rosamund	Worrall	Historic England		Will the Plan consider including development management policies in relation to shop fronts, advertisements and the design of security measures to ensure that town and local centre retail frontages retain elements of characterfulness and local distinctiveness?	Shopfronts, Advertisements and community safety are covered in the adopted High Quality Design SPD which was adopted in June.
TC8	11	Rosamund	Worrall	Historic England		Are there opportunities for the Plan to build on positive outcomes of the Town Centre THI to encourage heritage led regeneration?	Comments noted. The THI has been very successful and we will be building on the heritage led regeneration through the plan making process with the conservation officers in the team and other statutory consultees
TC8	28	Emily	Barker	Worcestershire County Council		Support the BDP maintaining limitations on the proliferation of hot food takeaways as per the current BDP25 policy. Suggest that this policy could go even further , to limit this use type in the proximity of areas of identified health deprivation and areas where obesity levels are higher than average. An HIA screening process could be introduced to limit food and drink premises which fall outside the A5 use class. This would help to foster the use of HIA in development management and would provide a tool to help to test whether and to what extent, health & wellbeing priorities are embedded in development proposals. The policy could be supported with detailed guidance similar to the "Planning for Health in South Worcestershire" SPD.	Comments noted. We will be working closely with the NHS and the County Council as part of the plan making process.
TC8	42			Wythall Residents Association		NWEDR should consult locally and find out what is required rather than telling us what they intend to do in a glossy brochure with inappropriate photographs and quotations. There are too many fast food outlets/take-aways in major shopping centres - policies need to be strengthened to further curb these in the interests of public health.	Comments noted and they will be communicated to NWEEDR. We will be working closely with our statutory consultees to ensure public health is considered through the plan making process.
TC8	72	Stephen	Peters			North Worcs. edR should consult locally and find out what is required rather than telling us what they intend to do in a glossy brochure with inappropriate photographs and quotations.  Generally, there are already too many fast food outlets and take-aways in our major shopping centres. Policies need to be strengthened to curb such developments still further in the interests of public health.	Comments noted and they will be communicated to NWEEDR.
TC8	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Major new residential development should be located where it can best support the function of Bromsgrove Town Centre. The proposals for residential development at the Bromsgrove Golf Centre are ideally located to do this.	Comments noted.
TC8	192			Dodford with Grafton Parish Council		Do charity shops count as real shops, empty retail units at 10% not a "true" figure.	Charity shops are classified under the A1 retail use class and are counted in the retail percentage for the town.
<b>Q.SOI1: What type of community facilities do you think are important for the District? Do you think Bromsgrove District has enough of them? Are they in the right locations and are they sufficiently well equipped and fit for purpose?</b>							
SOI1	1	Tammy	Williams	Alvechurch Parish Council		Facilities for the aged, mentally handicapped, youth facilities and the homeless could always be better	Comments noted. This is an important factor in considering inclusive facilities. We will ensure that community facilities are retained where possible and future provision is considered through the plan making process and supported by evidence.
SOI1	4	Barry	Spence	Bentley Pauncefoot Parish Council		We feel Community Halls are valuable assets and should be of sufficient size to be used for a variety of purposes. We regret the closure of so many public houses as these provide a valuable social hub, particularly in the rural areas. Policies should continue to resist more closures.	Comments noted. Para 94 in the NPPF states that planning policies should plan positively for the provision of community facilities including sports venues and other local services to enhance the sustainability of communities and residential environments.
SOI1	8	Nancy	Bailey	Frankley Parish Council		With an increasing older population, perhaps some warden control units could be considered, or villages with on-site facilities and activities, i.e. bowling greens.	Comments noted. We will ensure that any new development has access to the facilities they require and this will be considered in the policies going forward and supported by evidence.
SOI1	8	Nancy	Bailey	Frankley Parish Council		Garden villages need to have adequate schools, doctors, hospitals, retail units and community hubs. Hubs are needed for youngsters to hold clubs, i.e. martial arts, scouts and brownies, and for the older generation for bingo, dances.	Comments noted. We will ensure that any new development has access to the facilities they require and this will be considered in the policies going forward and supported by evidence.
SOI1	9	Alexandra	Burke	Hagley Parish Council		WFDC has policies under which community facilities cannot be converted to other purposes without clear evidence that they have been marketed for their existing use without success - BDC should have similar policies.	Comments noted that these suggestions are important factors for the provision of community facilities. They will be considered through the policies and supported by evidence which will establish the need across the District. Policy BDP12 Sustainable Communities in the Adopted BDP 2017 currently resists the loss of existing community facilities and any applications to provide supporting evidence that the site has been marketed for 12 months before the loss of a community facility could be supported.

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SOI1	20	P	Harrison	Wythall Parish Council		The medical centre at Station Road, Wythall is inadequate but the practice failed to make a case for funding when the new housing estate was planned. CCGs seem not to understand that they have an opportunity to improve surgeries and add capacity. A similar situation existed at the Longbridge housing development.	The NPPF states that there should be a sufficient choice of health facilities to meet the needs of existing and new communities and is something that will be addressed through partnership working with Worcestershire County Council and other stakeholders.
SOI1	28	Emily	Barker	Worcestershire County Council		Many sport and leisure facilities in the District but they should be available and accessible to the people who will benefit most from them.	Comments noted. The Bromsgrove Health and Well Being Profile has identified that Bromsgrove performs better than the national average for health, however through the profile they have been able to identify any problem areas and address them through relevant strategies in the future which will be supported by County Council and other stakeholders. Paragraph 91 of the NPPF also promotes healthy, inclusive and safe places which will also be promoted through the Plan Review.
SOI1	28	Emily	Barker	Worcestershire County Council		<ul style="list-style-type: none"> <li>- Flexible environments/lifetime neighbourhoods and homes standard</li> <li>- Provision of accessible greenspaces with benches in strategic places</li> <li>- Public toilet provision</li> <li>- Well signposted routes and simple street furniture</li> <li>-Circular walks in parks</li> <li>- Accessible public transport within walking distance of homes</li> <li>-Non reflective surfaces</li> <li>- Provide opportunities for community gardening</li> </ul>	Comments noted that the suggestions are important factors for the provision of community facilities and will be considered through the policies coming forward and supported by evidence which will establish the need across the district.
SOI1	28	Emily	Barker	Worcestershire County Council		Community, healthcare and education facilities in early phases of large developments and should be accessible by walking and cycling	Comments noted that the suggestions are important factors for the provision of community facilities and will be considered through the policies coming forward and supported by evidence which will establish the need across the District.
SOI1	34	Sue	Baxter			Having local community places to meet is very important to support health and well being and combat loneliness. These need to be located close to the communities they serve and should be factored into any new developments	Comments noted. The provision of community facilities will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI1	35	Peter	King	Campaign to Protect Rural England		<p>CPRE is not in a position to point to any particular deficits. However any new (or substantially expanded) settlements, including urban extensions should have a local centre, whose composition will need to depend on the size of the new settlement:</p> <ul style="list-style-type: none"> <li>•A convenience store or several shops.</li> <li>•A multi-use community hall or a community centre with rooms of several sizes.</li> <li>•A parish office (if in a parished area and if none exists).</li> <li>•Sports pitches and other public space.</li> <li>•Medical centre.</li> <li>•Primary School.</li> <li>•Allotment gardens.</li> <li>•Etc.</li> </ul> <p>BDP 2017 provided for a Perryfields development to have some of these. The planning application for Foxlydiate similarly makes provision for some of these. However, it will be better for this to be covered by specific policies of general operation.</p> <p>Wyre Forest District Council has policies requiring community facilities to be shown (by marketing) to be redundant before they can be converted to other uses. BDC should have something similar.</p>	Comments noted that the suggestions are important factors for the provision of community facilities and will be considered through the policies. They will be supported by evidence which will establish the need across the district. Policy BDP12 Sustainable Communities in the Adopted BDP 2017 currently resists the loss of existing community facilities and any applications to provide supporting evidence that the site has been marketed for 12 months before the loss of a community facility could be supported.
SOI1	42			Wythall Residents Association		The medical centre at Station Road, Wythall is inadequate but the practice failed to make a case for funding when the new housing estate was planned. CCGs seem not to understand that they have an opportunity to improve surgeries and add capacity. A similar situation existed at the Longbridge housing development.	Closer partnership working through the plan making process will enable us to plan for the health of the District and by looking at existing health care provision.
SOI1	71	Stuart	Field			<p>Bromsgrove is lacking community facilities, and I do not think Bromsgrove has enough of them. Community facilities, in particular sports facilities, can play an important role in our health and well-being and offer social integration. For this reason I therefore believe a sports hall should be provided alongside the existing Bromsgrove Leisure Centre site, which could also be doubled-up as a community facility. A Sports Hall for Bromsgrove would allow residents to play a number of team sports, as opposed to individual leisure pursuits that are on offer at the Bromsgrove Leisure Centre. Policy BDP17.12 of the current adopted Bromsgrove District Plan says a sports hall should be included as part of the leisure centre. This policy should be carried over. "C. The new leisure centre should contain, a swimming pool, fitness suite, multifunctional studios, sports hall facilities and ancillary uses such as café/ restaurant will also be acceptable;"</p> <p>Sport is proven to reduce adult and child obesity and improve mental well-being</p>	Comments noted. We will engage closely with our colleagues in Leisure and ensure that existing and future provision is met.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SOI1	72	Stephen	Peters			The medical centre at Station Road, Wythall is inadequate but the practice failed to make a case for funding when the new housing estate was planned. CCGs seem not to understand that they have an opportunity to improve surgeries and add capacity. A similar situation existed at the Longbridge housing development.	The NPPF states that there should be a sufficient choice of school facilities and health facilities to meet the needs of existing and new communities and is something that will be addressed through partnership working with Worcestershire County Council and other partners.
SOI1	98	Sally	Oldaker			Well, we've had the whole leisure centre debacle, ending up with a very expensive building with no sports hall! And the poor old Spadesbourne Suite was really good – that will now get pulled down, as the council has stupidly moved to Parkside which is not fit for purpose and cost a fortune which they did not have! Just think – if that money had been saved, maybe some of our libraries would not now be in danger of closure. . .	Comments noted. The provision of shared spaces in particular sports venues is prompted in the NPPF para 92. The decision to locate the council facilities including the Library in a central location in the town was made through partnership working and delivered through the previous Local Plan. The Parkside Suite has replaced the Spadesbourne suite for events which is a successful replacement. Funding relating to library services is the remit of the County Council and funding cuts are unfortunately an issue around the country. We will work with key stakeholders through the Local Plan Review process and evidence to identify the need in the District.
SOI1	124	Robert	Lofthouse	Savills	Taylor Wimpey	The Perryfields development will deliver a mixed use local centre, community and recreation facilities to support and foster the well-being of the community of the development. It will also deliver a new first school to accommodate the needs of the growing population. Together with significant areas of new public open spaces recreation areas and sports pitches, the Perryfields development will make an important contribution to the provision of community facilities, for the benefit of future and existing residents. This will be secured and delivered through planning obligations with the Council.	Comments noted.
SOI1	155	Erica	Loftus			Any development will require substantive investment in infrastructure, particularly doctors surgeries, shopping amenities, schools and transport.	Comments noted. We will be able to establish the need of the district through the appropriate evidence base.
SOI1	160	I M	Jarrett			Infrastructure for the whole of the District must be upgraded i.e. roads, schools, health services and any increase in population and paying large council taxes expect the basic services to be more than adequate.	Noted. The infrastructure requirements to support the Plan Review will be set out in an updated Infrastructure Delivery Plan and will need to accurately reflect the scale and location of growth proposed.
SOI1	161	Ian	Macpherson		Self	Playing Fields in great demand. Provision of Public Toilets	Comments noted. These are important factors for considering community facilities and will be addressed through the plan making process supported by evidence.
SOI1	162	J	Woods		Self	A town the size of Bromsgrove should have its own sports hall and not rely on limited availability at schools.	Paragraph 92 in the NPPF advocates that planning policies should plan positively for the provision and use of shared spaces such as sports venues.
SOI1	165	Johanna	Wood			Generally Bromsgrove seems to have a reasonable range of community facilities. However, whether these fully meet everyone's needs is questionable in terms of hours of opening and accessibility .	Comments noted. Access to services is an important factor in providing community facilities. The opening times of facilities are not always controlled through the planning system, however we will be able to work with stakeholders and address accessibility issues.
SOI1	166	John	Gerner			Public parks, meeting places, sports facilities. Insufficient provision across the district.	Comments noted that the suggestions are important factors for the provision of community facilities and will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI1	183	Nigel	Perfett	Community Badminton Group		Bromsgrove needs its own Sports Hall (we already have one, just 32 years old, still used, fit for purpose but deliberately neglected by the Council). No need to build a new one. We have a 68% overweight/obese population, we want to improve mental health, increase physical activity (9.4 Scoping report). We want a place to play badminton, volleyball, table-tennis, cricket, martial arts, and a soft-play area for children. In other words, exactly for the same reason as it was purpose-built and added to the Dolphin Centre. Our new BLSC Leisure Centre has NONE of these facilities.	Comments noted and welcomed. We will communicate your concerns to colleagues in Leisure.
SOI1	184	Nina and Ray	Read			No more development without provision of health services, schools, public transport.	Comments noted. The NPPF states that there should be a sufficient choice of school facilities and health facilities to meet the needs of existing and new communities and is something that will be addressed through partnership working with Worcestershire County Council and other stakeholders.
SOI1	192			Dodford with Grafton Parish Council		Like the fact that there is a new gym complex, and Sanders Park. More could possibly be made of the AE Houseman connection. Facilities for young people such as Youth Clubs are inadequate with funding having been decimated in recent years.	Comments noted. Para 94 in the NPPF states that planning policies should plan positively for the provision of community facilities including sports venues and other local services to enhance the sustainability of communities and residential environments. The plan will provide policies to promote the provision of services and facilities to meet the need of the community.



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SOI1	192			Dodford with Grafton Parish Council		Community facilities – perhaps financial support / assistance to village halls in our villages to provide local activities and decrease commuting. Continued assistance for the Artrix.	Comments noted. The planning system does not provide direct financial support but opportunities for future provision will be explored through the plan making process.
<b>Q.SOI2: Are there any community and leisure facilities that you don't currently have easy access to that you feel would improve your quality of life or benefit your local community? If so, please specify what and where you think it should be provided</b>							
SOI2	1	Tammy	Williams	Alvechurch Parish Council		More regular local bus services that link to local rail stations and to neighbouring conurbation public transport service routes.	Comments noted and will be passed onto our colleagues at Worcestershire County Council. Access to sustainable transport is important and we will ensure that the existing and any new development is adequately addressed through partnership working with the County Council.
SOI2	4	Barry	Spence	Bentley Pouncefoot Parish Council		Bentley's nearest pubs have closed and we would support the re-opening of the Gate Hangs Well which is close to our Parish boundary. The Parish has its own village hall which is well used.	The provision of community facilities, particularly in rural areas is important. Policy BDP12 in the Adopted Local Plan resists the loss of existing community facilities unless there is supporting evidence which demonstrates that the facility is no longer viable. Although the viability of a facility is out of the control of the planning system, there are options for communities through the Community Right to Bid to save assets that are important to them.
SOI2	20	P	Harrison	Wythall Parish Council		<p>The Artrix centre is of little value to residents in Wythall and like the new Bromsgrove Sports and Leisure centre their Council Tax contributes to facilities they never use.</p> <p>Wythall receives no revenue support for its privately-run park in Silver Street and yet taxpayers have to fund improvements to Sanders Park which they never use.</p> <p>Wythall residents would benefit from shared use of cross-boundary leisure facilities such as Cocks Moors Woods and Solihull.</p>	Comments noted. The facilities across the District are valuable to it's residents. The provision and location of community facilities will be considered through the plan making process and supported by evidence which will establish this need across the District.
SOI2	34	Sue	Baxter			<p>The Artrix centre, Bromsgrove Sports and Leisure centre, Sanders park are all facilities that Wythall residents pay for through their council tax but do not have easy access to.</p> <p>Wythall residents would benefit from shared use of cross-boundary leisure facilities such as Cocks Moors Woods and Solihull.</p>	Comments noted. The facilities across the District are valuable to it's residents. The provision and location of community facilities will be considered through the plan making process and supported by evidence which will establish this need across the District.
SOI2	42			Wythall Residents Association		<p>The Artrix and Bromsgrove Sports and Leisure centre are of little value to residents in Wythall and pay Council Tax towards facilities they never use.</p> <p>Wythall receives no revenue support for its privately-run park in Silver Street and yet taxpayers have to fund improvements to Sanders Park which they never use.</p> <p>Wythall residents would benefit from use of cross-boundary leisure facilities such as Cocks Moors Woods and Solihull.</p>	Comments noted. The facilities across the District are valuable to it's residents. The provision and location of community facilities will be considered through the plan making process and supported by evidence which will establish this need across the District.
SOI2	71	Stuart	Field			I currently do not have access to sports facilities in Bromsgrove. I do not swim or go to the gym, so don't use Bromsgrove Leisure Centre, instead I often go to Droitwich, Worcester or Kidderminster to play 5-a-side football and badminton. Along with a number of residents, I feel there is a lack of team sports facilities in Bromsgrove. Team sports provide social integration and health benefits. For this reason I therefore believe a sports hall should be provided alongside the existing Bromsgrove Leisure Centre site, which could also be doubled-up as a community facility. A Sports Hall for Bromsgrove would allow residents to play a number of team sports, as opposed to individual leisure pursuits that are on offer at the Bromsgrove Leisure Centre. Policy BDP17.12 of the current adopted Bromsgrove District Plan says a sports hall should be included as part of the leisure centre. This policy should be carried over. "C. The new leisure centre should contain, a swimming pool, fitness suite, multifunctional studios, sports hall facilities and ancillary uses such as café/ restaurant will also be acceptable;"	Comments noted and welcomed. The provision and location of community facilities will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI2	71	Stuart	Field			I currently do not have access to sports facilities in Bromsgrove. I do not swim or go to the gym, so don't use Bromsgrove Leisure Centre, instead I often go to Droitwich, Worcester or Kidderminster to play 5-a-side football and badminton. Along with a number of residents, I feel there is a lack of team sports facilities in Bromsgrove. Team sports provide social integration and health benefits. For this reason I therefore believe a sports hall should be provided alongside the existing Bromsgrove Leisure Centre site, which could also be doubled-up as a community facility. A Sports Hall for Bromsgrove would allow residents to play a number of team sports, as opposed to individual leisure pursuits that are on offer at the Bromsgrove Leisure Centre. Policy BDP17.12 of the current adopted Bromsgrove District Plan says a sports hall should be included as part of the leisure centre. This policy should be carried over. "C. The new leisure centre should contain, a swimming pool, fitness suite, multifunctional studios, sports hall facilities and ancillary uses such as café/ restaurant will also be acceptable;"	Comments noted. The provision and location of community facilities will be considered through the plan making process and supported by evidence which will establish the need across the District.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SOI2	72	Stephen	Peters			The Artrix centre is of little value to residents in Wythall and like the new Bromsgrove Sports and Leisure centre their Council Tax contributes to facilities they never use. Wythall receives no revenue support for its privately-run park in Silver Street and yet taxpayers have to fund improvements to Sanders Park which they never use. Wythall residents would benefit from shared use of cross-boundary leisure facilities such as Cocks Moors Woods and Solihull.	Comments noted. The facilities across the District are valuable to it's residents. The provision and location of community facilities will be considered through the plan making process and supported by evidence which will establish this need across the District.
SOI2	161	Ian	Macpherson		Self	Playing Fields in great demand. Provision of Public Toilets	Comments noted. These are important factors for considering community facilities and will be addressed through the plan making process and supported by evidence.
SOI2	162	J	Woods		Self	Bromsgrove should have sports hall availability 52 weeks of the year and should include daytime availability for shift workers and retired people who want to maintain their general fitness and mental health. The facilities should have good access to accommodate people with disabilities .	Comments noted. The provision and location of community facilities will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI2	166	John	Gerner			It is a severe embarrassment that Bromsgrove Sport and Leisure Centre does not have its own sports hall	We will ensure that your comments are communicated to our colleagues in Leisure.
SOI2	183	Nigel	Perfett	Community Badminton Group		I do not currently have easy access to community Badminton, Table Tennis, Basket ball, and other sports facilities for mixed ages, abilities and genders to participate in the centre of Bromsgrove, now that the Sports Hall faces demolition. I am one of a large group who enjoy evening and weekend Badminton games with others, but it seems there is no longer alternative venues, which are not independently run for profit and available throughout the year. This has significant benefits for health, wellbeing and good mental health for all ages.	Comments noted that the suggestions are important factors for the provision of community facilities and will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI2	192			Dodford with Grafton Parish Council		Like the fact that there is a new gym complex, and Sanders Park. More could possibly be made of the AE Houseman connection. Facilities for young people such as Youth Clubs are inadequate with funding having been decimated in recent years.	Comments noted. Providing appropriate community facilities is important for the future and through supporting evidence we will be able to establish what the need is across the District.
<b>Q.SOI3: Do you feel that there are enough things to do for different age groups? Are there any age groups that you feel aren't provided?</b>							
SOI3	1	Tammy	Williams	Alvechurch Parish Council		The disabled and mentally handicapped across the age range always seem to be neglected, especially those without their own transport options	Comments noted. Provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	4	Barry	Spence	Bentley Pouncefoot Parish Council		There seem to be few facilities for older children other than the Leisure Centre; the cinema complex in Rubery and theatre in Redditch offer alternatives but require travel.	Comments noted. Provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council note that there is not much for young people to do in the district - we would like to see money invested in youth clubs	Comments noted. Provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	20	P	Harrison	Wythall Parish Council		Local voluntary groups tend to fill the gaps in provision as they arise in Wythall. There is a good community spirit.	Comments noted. It is good news that voluntary groups are very active in Wythall. The provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	34	Sue	Baxter			Wythall is fortunate in that it has many local community groups that fill the gaps.	Comments noted. It is good news that voluntary groups are very active in Wythall. The provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	42			Wythall Residents Association		Local voluntary groups fill the gaps in provision as they arise in Wythall. There is a good community spirit.	Comments noted. It is good news that voluntary groups are very active in Wythall. The provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	72	Stephen	Peters			Local voluntary groups tend to fill the gaps in provision as they arise in Wythall. There is a good community spirit.	Comments noted. It is good news that voluntary groups are very active in Wythall. The provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	98	Sally	Oldaker			We probably need more for teenagers.	Comments noted. Provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	161	Ian	Macpherson		Self	Yes - teenagers, but don't know what is required.	Comments noted. Provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	165	Johanna	Wood			There is a visible lack of youth facilities, the provision of which might just help reduce crime levels too.  There also seems to be a reliance on private organisations providing entertainment and facilities to meet up with others for the elderly	Comments noted. Provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.



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SOI3	166	John	Gerner			No. Insufficient youth activity provision	Comments noted. Provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	183	Nigel	Perfett	Community Badminton Group		I feel that there are not enough opportunities for older people in terms of Exercise and community games like Circuit training, badminton and table tennis. I think also that a Soft-play area for young children (like Imagination street - now demolished) would be very popular and could generate significant revenues for parties, jamborees and festivals. The Sports hall would be ideal.	Comments noted. Provision of facilities for these groups will be considered through the plan making process and supported by evidence which will establish the need across the District.
SOI3	192			Dodford with Grafton Parish Council		Like the fact that there is a new gym complex, and Sanders Park. More could possibly be made of the AE Houseman connection. Facilities for young people such as Youth Clubs are inadequate with funding having been decimated in recent years.	Comments noted.
SOI3	192			Dodford with Grafton Parish Council		As the population increases and gets older, planning for future healthcare needs is essential.	Comments noted. The provision of facilities will be considered through the plan making process and supported by evidence which will establish the need across the District.
<b>Q.SOI4: Do you think there is a good range of health facilities in the District? Do you think there are the right types of facilities/services in the right locations and are they easy to access?</b>							
SOI4	1	Tammy	Williams	Alvechurch Parish Council		There have been issues in the District with maternity services and paediatrics being transferred to Worcester City Hospital, and patients in Alvechurch being linked to the Birmingham Health Clinical Commissioning Group(BHCCG) as opposed to the Worcestershire HCCG. As after care social services some-times will not cross LA boundaries. Cottage hospitals used to provide for minor injuries perhaps GP surgeries could be given extra funding to extend their services for this type of facility.	Comments noted that there is a cross boundary approach for accessing health facilities between Worcestershire & Birmingham. We will ensure that your comments are communicated to the CCG and through partnership working and evidence base establish any gaps in provision across the district.
SOI4	2	Gill	Lungley	Barnt Green Parish Council		There is a good range of health facilities in the District even though key services, such as A&E, are not present. The pressure on GP surgeries needs to be addressed to deliver increased capacity and facilities.	Through the Local Plan process we will be able to establish the need of facilities and services in the district which will be supported by evidence. Unfortunately, the location of hospital facilities is out of the control of the planning system but we will communicate your comments to the CCG.
SOI4	4	Barry	Spence	Bentley Pouncefoot Parish Council		We believe there are reasonable health facilities in our locality. Concerns arise because of the appointments systems which are a matter outside the Council's control. The potential development at Foxlydiate will place a major burden upon medical facilities and this has not been adequately accounted for within the planning Application.	Comments noted. The Foxlydiate application includes the provision of a new health & community facility.
SOI4	6	Rebekah	Powell	Catshill and North Marlbrook Parish Council		It was also considered that insufficient attention was being given to the necessary infrastructure in advance of the provision of new housing development.	Comments noted. Any future development in the district will need to consider the existing infrastructure along with a robust evidence.
SOI4	9	Alexandra	Burke	Hagley Parish Council		Becoming increasingly difficult to get a medical appointment at short notice, unfortunately not an issue that can be solved through planning policy. However, every major development should be accompanied by an assessment of how primary healthcare needs of an enlarged settlement can be met.	Agreed that healthcare is an important consideration for future development and will be considered through the plan making process.

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SOI4	14	Jo	Hall	NHS Redditch & Bromsgrove CCG		<p>The CCG need to ensure that there are sufficient GPs with capacity to meet the needs arising from new housing developments. The consequences of housing development are largely invisible until patients are unable to get access to healthcare. Health doesn't receive funding for population growth until 12 months later. Now only a national funding stream available and the CCG has to apply for capital funding.</p> <p>Worcestershire will be a lower priority than more deprived areas and acute trusts are more likely to be a higher priority than primary care. There are resulting revenue consequences , the funding for which has to come from Worcestershire's total healthcare budget.</p> <p>Redditch &amp; Bromsgrove is Worcestershire's weakest area for the provision of general practice. It has the highest numbers of GPs and Nurses who will be reaching retirement within the next 5 years. Many of the existing GP premises were identified as being unable to cope with any large increase in patient registration, and some would have little or no room for expansion.</p> <p>If an additional 7,000 houses are built within Bromsgrove District, a potential 16,500 additional patients will need to be able to register with a GP. This provides opportunities for working in new ways with new partners and service models are key.</p> <p>To accommodate additional patients there would need to be an extension/internal modification of existing premises, or the development of new premises. The options that would be least favoured by the CCG would be dispersed developments or urban intensification. The former would be hard if patients were in widespread locations and the latter would be unlikely to be able to be accommodated in existing urban practice premises. Preferred Options would be around existing settlements, urban extensions or new settlements of existing scale to support the development of new practice premises or extensions to existing premises where this is possible, or co-location with other services in a multi functional hub.</p> <p>We would be grateful if colleagues in the Acute &amp; Health &amp; Care Trusts could be invited to take part in future discussions.</p>	Comments noted and we welcome partnership working to establish the needs of the CCG through the plan making process. We will ensure that you are invited to take part in future discussions.
SOI4	17	Stuart	Morgans	Sport England		<p>In respect of Health and Education Facilities (SOI4-5), Sport England supports policies that take the opportunity to actively promote the benefits of co-location of health and education facilities with sport and recreation facilities in accordance with our Active Design guidance.</p> <p>Sport England actively promotes and secures community use of school sports facilities to maximise the benefits to the local community and to help meet local needs. The District Plan Review should promote community use where possible as this accords with the guidance in the NPPF paragraph 91, for instance by promoting social interaction, and to enable and support healthy lifestyles by providing safe convenient access to such infrastructure.</p> <p>Sport England objects to school expansions and developments of new schools on sites where this would lead to the loss of playing fields, where it cannot be demonstrated that this would accord with the exception tests set out in paragraph 97 of the NPPF and the guidance in Sport England's policy.</p>	Comments noted and we welcome partnership working to establish the needs of Sport England through the plan making process.
SOI4	20	P	Harrison	Wythall Parish Council		<p>Primary care facilities are generally accessible within their communities. Hospital facilities are often too remote, difficult to reach and expensive if taxis are used.</p>	Through the Local Plan process we will be able to establish the need of facilities and services in the district which will be supported by evidence. Unfortunately, the location of hospital facilities is out of the control of the planning system but we will communicate your comments to the CCG and work in partnership through the plan making process.
SOI4	28	Emily	Barker	Worcestershire County Council		<p>Strongly recommend that a dedicated Health &amp; Wellbeing Policy is included. Support the findings of the SA scoping report noted in paragraph 9.4, question whether the focus as suggested in para 9.5 is sufficient to cover the wide ranging health and wellbeing challenges facing the district. Recommend a comprehensive approach to health and wellbeing principles. Important to ensure that all these issues are given full consideration and that the Health &amp; Wellbeing Policy provides the overarching direction to ensure applicants and decision makers take these into full account.</p>	Comments noted & welcomed. We will ensure that health and wellbeing is considered through the plan making process and ensure that they are considered at application stage with colleagues.
SOI4	28	Emily	Barker	Worcestershire County Council		<p>Recommend developing health policy in partnership with the Directorate of Public Health and Strategic Planning Team at WCC. Happy to facilitate such engagement. Should reference and address the priorities of Worcestershire's Joint Health &amp; Well Being Strategy 2016-21. These are: - Good mental health &amp; wellbeing throughout life; Being active at every age; Reducing harm from alcohol at all ages.</p>	Comments noted and the County Council support is welcomed.
SOI4	30	Andrew	Peacock	Barnt Green Surgery		<p>We provide an excellent basic level of primary care. However our ability to provide an enhanced service is limited by restriction in building space and increasing patient population. We are on a tight site and have minimal opportunity for building growth within that site. Our full-time equivalent GP: patient ratio is already higher than the national average. We would struggle to accommodate any significant population growth within our practice without significantly detracting from the care we offer to our current patients.</p>	Comments noted and welcomed. Your comments will be considered through the plan making process and discussions will take place with CCG and other stakeholders to ensure existing provision is adequate. Through supporting evidence we will be able to address any issues.

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SOI4	34	Sue	Baxter			Primary care facilities are generally accessible, however acute care is not. travelling to Worcester following the downgrading of the Alexander Hospital is ridiculous when the Queen Elizabeth hospital is on our doorstep in Wythall	Comments noted that people who live in Wythall are more likely to access health facilities in Birmingham. We will ensure that your comments are communicated to the CCG and through partnership working and evidence base establish any gaps in provision across the district.
SOI4	42			Wythall Residents Association		Primary care facilities are generally accessible within their communities. Hospital facilities are often too remote, difficult to reach and expensive if taxis are used.	Through the Local Plan process we will be able to establish the need of facilities and services in the district which will be supported by evidence. Unfortunately, the location of hospital facilities is out of the control of the planning system but we will communicate your comments to the CCG.
SOI4	72	Stephen	Peters			Primary care facilities are generally accessible within their communities. Hospital facilities are often too remote, difficult to reach and expensive if taxis are used.	Through the Local Plan process we will be able to establish the need of facilities and services in the district which will be supported by evidence. Unfortunately, the location of hospital facilities is out of the control of the planning system but we will communicate your comments to the CCG.
SOI4	98	Sally	Oldaker			Doctor's surgeries are oversubscribed – at least mine is – so it can be hard to get an appointment. We need more of these if you're going to keep building more homes! And they should all have free parking.	Through the Local Plan process we will be able to establish the need of facilities and services in the district which will be supported by evidence. Unfortunately, the location of hospital facilities is out of the control of the planning system but we will communicate your comments to the CCG.
SOI4	146	Charlotte	Quirck			No increase in GPs/schooling facilities even with increase in housing	Through the Local Plan process we will be able to establish the need of facilities and services in the district which will be supported by evidence.
SOI4	148	Christine	Thomas		Self	Although there is land available adjacent to the M42 which lends itself to housing needs there is a shortage of local amenities e.g. school places, medical facilities for an expanding population, which definitely need addressing. The local surgery is split between two sites. Patients may have to travel to Kings Norton within the Birmingham area for appointments. Elderly patients are sent to residential homes within Birmingham, miles from their support network in the village.	Comments noted that there is a cross boundary approach for accessing health facilities between Worcestershire & Birmingham. We will ensure that your comments are communicated to the CCG and through partnership working and evidence base establish any gaps in provision across the district.
SOI4	155	Erica	Loftus			Alvechurch surgery is oversubscribed and it is impossible to get timely appointments.  It is impossible to recruit GP's for existing facilities, so unsure how any expansion would be staffed.	Through the Local Plan process we will be able to establish the need of facilities and services in the district which will be supported by evidence. Unfortunately, the location of hospital facilities is out of the control of the planning system but we will communicate your comments to the CCG.
SOI4	160	I M	Jarrett			Infrastructure for the whole of the District must be upgraded i.e. roads, schools, health services and any increase in population and paying large council taxes expect the basic services to be more than adequate.	Through the Local Plan process we will be able to establish the need of facilities and services in the district which will be supported by evidence.
SOI4	161	Ian	Macpherson		Self	In Hagley the doctors' surgery is overloaded and difficult to get appointments.	Comments noted and we will ensure that your comments are communicated to the CCG and through partnership working and evidence base establish any gaps in provision across the district.
SOI4	165	Johanna	Wood			No , the range of health facilities is limited. There is no A&E in the district and access to the Alex and Worcester is difficult by public transport. Doctors surgeries are centres around the town which means most people have to travel ( not walk) to see a doctor. Question if there are enough doctors surgeries in the district	Comments noted and we will ensure that your comments are communicated to the CCG and through partnership working and evidence base establish any gaps in provision across the district.
SOI4	192			Dodford with Grafton Parish Council		POWCH could be better utilised for local services from the WAHT and H&C Trusts. Further housing without extension of the schools and health services would be disastrous.	Comments noted.
<b>Q.SOI5: What educational facilities do you think are needed in the District to support existing and new communities and to help address skills shortages within the local economy?</b>							
SOI5	1	Tammy	Williams	Alvechurch Parish Council		Better access made in local schools for local children, rather than some having to travel out of areas to other schools through lack of school places. More training opportunities at local colleges for apprenticeship courses ,particularly within the building and engineering trades.	Through the Local Plan process we will be able to establish the need for schools and other facilities/services in the district which will be supported by evidence. HOW college currently offer vocational subjects and apprenticeships for young people which has a campus in Bromsgrove.
SOI5	4	Barry	Spence	Bentley Pouncefoot Parish Council		We support the provision of school places on large new developments or contributions to extra facilities at existing schools from smaller developments.	Comments noted. Through the local plan process and supporting evidence we will be able to establish the need for education and other community facilities in the district.
SOI5	9	Alexandra	Burke	Hagley Parish Council		The LEA's view appears to be that it can manage the situation.	Comments noted.
SOI5	20	P	Harrison	Wythall Parish Council		We would like to see a Grammar School established in Wythall so that the brightest and most apt pupils can benefit from the high-quality state education that I received at Bromsgrove High School before its decline as a comprehensive school.	The County Council are the lead education authority and unfortunately we are unable to be this prescriptive regarding the type of schools we have in the district. Through the local plan process we will be able to establish the need for schools and other services in the district which will be supported by evidence.

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SOI5	28	Emily	Barker	Worcestershire County Council		WCC's Children, Families and Communities Directorate will continue to work with Bromsgrove as the plan develops to provide detailed comments.	Comments of partnership working are welcomed.
SOI5	34	Sue	Baxter			School admissions policies must ensure that all local children within the catchment area are catered for rather than selecting pupils from outside of the area.	Comments noted.
SOI5	42			Wythall Residents Association		The recent expansion of the school complex in Shawhurst Lane, Wythall has led to increased traffic congestion. Further development should be resisted in favour of new locations in Wythall.	Comments noted. Through the local plan process and supporting evidence we will be able to establish the need for education and other community facilities in the district.
SOI5	72	Stephen	Peters			I would like to see a Grammar School established in Wythall so that the brightest and most apt pupils can benefit from the high-quality state education that I received at Bromsgrove High School before its decline as a comprehensive school.	The County Council are the lead education authority and unfortunately we are unable to be this perscriptive regarding the type of schools we have in the district. Through the local plan process we will be able to establish the need for schools and other services in the district which will be supported by evidence.
SOI5	98	Sally	Oldaker			Same – schools are too overcrowded. The document states that: 'Forecasts indicate that pupil numbers are set to increase, which could result in a shortage of school places' – oh really? Build some new small schools rather than expand existing ones. And try to get more money for schools so they don't have to use temporary classrooms.	Comments noted. Through the local plan process and in partnership with WCC we will establish the need for education and other community facilities in the district which will be supported by a robust evidence base.
SOI5	161	Ian	Macpherson		Self	More school places required in sustainable locations - to avoid traffic chaos	Through the Local Plan process we will be able to establish the need for schools and other facilities/services in the district which will be supported by evidence.
SOI5	165	Johanna	Wood			We need a vocationally focussed higher education college which would support future local business investment. Need the appropriate number of schools to meet future needs of the community and growth in population.	HOW college currently offer vocational subjects and apprenticeships for young people which has a campus in Bromsgrove. Through the Local Plan process we will be able to establish the need for schools and other facilities/services in the district which will be supported by evidence.
SOI5	166	John	Gerner			Additional school places required	Comments noted. Through the local plan process and supporting evidence we will be able to establish the need for education and other community facilities in the district.
SOI5	192			Dodford with Grafton Parish Council		POWCH could be better utilised for local services from the WAHT and H&C Trusts. Further housing without extension of the schools and health services would be disastrous.	Through the Local Plan process we will be able to establish the need for schools and other facilities/services in the district which will be supported by evidence.
SOI5	195	D R	Clarke			All the foregoing would need adequate provision for infrastructure to support the new development including road improvements, health facilities, education and shops.	Comments noted. Through the local plan process and supporting evidence we will be able to establish the need for education and other community facilities in the district.
<b>Q.SOI6: Are there any existing parks or areas of open space within the District that you think could have a multi-use? e.g. for recreation uses alongside green infrastructure</b>							
SOI6	1	Tammy	Williams	Alvechurch Parish Council		Yes at Hopwood Community Playing field and centre	Comments noted.
SOI6	9	Alexandra	Burke	Hagley Parish Council		As a general rule, existing open space should be retained, except where one area of open space is exchanged for another. New open space should be a parcel of land large enough, so that some sporting or recreational use can be made of it. Where there is demand for more allotments they should be provided, existing ones should be protected from development.	Policy BDP25 Health and Well Being in the adopted local plan resists the loss of open space, sport and recreation facilities. Supporting evidence and assessment will establish the existing provision and need in the district.
SOI6	13			Natural England		The phrasing of this question is confused; 'green infrastructure' can be considered as an umbrella term, with recreation and other uses underneath, for example biodiversity provision and flood attenuation. Nevertheless we support the consideration of this important issues within the plan.	Comments noted and the use of 'Green Infrastructure' as an umbrella term will be avoided.
SOI6	20	P	Harrison	Wythall Parish Council		Wythall Park has multiple users and is run as a charity. It receives no financial support from the Council. However, it is not well-managed or sustainably funded.	Policy BDP25 Health and Well Being in the adopted local plan resists the loss of open space, sport and recreation facilities. Supporting evidence and assessment will establish the existing provision and need in the district. We will communicate your concerns with the Leisure department.
SOI6	34	Sue	Baxter			Wythall Park has multiple users and is run as a charity. It receives no financial support from the Council. However, it is not well-managed or sustainably funded.	Policy BDP25 Health and Well Being in the adopted local plan resists the loss of open space, sport and recreation facilities. Supporting evidence and assessment will establish the existing provision and need in the district.
SOI6	42			Wythall Residents Association		Wythall Park has multiple users and is run as a charity. It receives no financial support from the Council. However, it is not well-managed or sustainably funded.	Comments will be communicated to our Parks and Leisure department.
SOI6	72	Stephen	Peters			Wythall Park has multiple users and is run as a charity. It receives no financial support from the Council. However, it is not well-managed or sustainably funded.	Policy BDP25 Health and Well Being in the adopted local plan resists the loss of open space, sport and recreation facilities. Supporting evidence and assessment will establish the existing provision and need in the district. We will communicate your concerns with the Leisure department.

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SOI6	72	Stephen	Peters			Wythall Park has multiple users and is run as a charity. It receives no financial support from the Council. However, it is not well-managed or sustainably funded.	Policy BDP25 Health and Well Being in the adopted local plan resists the loss of open space, sport and recreation facilities. Supporting evidence and assessment will establish the existing provision and need in the district.
SOI6	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	Established areas of formal and informal open space should be protected, if they are already used and enjoyed by the community. We support the use of community hubs but would like to know more about it before we could commit to a policy requiring their provision/inclusion in a scheme	Policy BDP25 Health and Well Being in the adopted local plan resists the loss of open space, sport and recreation facilities. Supporting evidence and assessment will establish the existing provision and need in the district.
SOI6	112	Gareth	Sibley	RCA Regeneration	Piper Group	Provision of more natural play areas should be considered. These tend to blend more effectively with the natural environment and have less effect on wildlife , which benefit from fallen logs, organic surfaces and peripheral areas of woodland. Play areas that have different character are important in generating different types of play and risk taking and are cheaper to maintain. Established areas of formal/informal open space should be protected.	Comments noted. Through supporting evidence we will be able to establish the need of play areas in the district.
SOI6	161	Ian	Macpherson		Self	Possibly	Comments noted.
SOI6	189	Phil	Pleasant		Self	Expand to include: promoting use of and enhancing signage and condition of footpaths, bridleways, etc.	Comments noted that we should consider enhancing the use of sinage and the condition of footpaths through the plan making process.
SOI6	192			Dodford with Grafton Parish Council		Fewer, larger spaces feel more appropriate, but green spaces in town are also helpful.	Comments noted. The provision of Green space in urban areas has many health benefits and through supporting evidence we will be able to establish the need of the district.
<b>Q.SOI7: The Council has been focusing on creating fewer, higher quality open spaces and play spaces where more play equipment is provided in concentrated areas, rather than providing lots of smaller play areas. Do you agree with this approach?</b>							
SOI7	1	Tammy	Williams	Alvechurch Parish Council		Small settlements with small play areas should also have the benefit of some decent play equipment as well.	Comemnts noted. Supporting evidence we gather will enable us to understand what the need is in the district and plan for this. Open space should be taken into account in planning for new development and considering proposals that may affect existing open space which is identified through our existing policy BDP25 and National Planning Policy.
SOI7	4	Barry	Spence	Bentley Pauncefoot Parish Council		The Council’s approach should be in accordance with the ‘Fields in Trust’ “Guidance for Outdoor Sport and Play – Beyond the Six Acre Standard” so whilst larger spaces are commendable on mid-large developments some smaller local facilities should be provided with smaller Local Areas for Play or Local Equipped Areas for Play.	Our existing policy BDP25 Health and Well Being supports a similar approach to The National Playing fields Association strategy and the evidence assessment will establish the need in district.
SOI7	20	P	Harrison	Wythall Parish Council		We agree that small play spaces are to be discouraged. They are frequently under-used and poorly equipped and maintained and lead to anti-social behaviour.	Comments noted. Existing Policy BDP25.3 does currently protect designated and undesignated areas of outdoor open space, sport and recreation. Can't find the evidence to suggest why the council are focusing on fewer, high quality open space?
SOI7	34	Sue	Baxter			I agree that small play spaces are to be discouraged. They are frequently under-used and poorly equipped and maintained and lead to anti-social behaviour.	Comments noted.
SOI7	42			Wythall Residents Association		Agree that small play spaces should be discouraged. They are frequently under-used, poorly equipped and maintained and lead to anti-social behaviour.	Comments noted. Through the local plan process and supporting evidence we will be able to establish the need for sport and recreation facilities in the district.
SOI7	72	Stephen	Peters			I agree that small play spaces are to be discouraged. They are frequently under-used and poorly equipped and maintained and lead to anti-social behaviour.	Comments noted. We will be able to establish the need of the district through gathering relevant supporting evidence.
SOI7	78	Sean	Rooney	Harris Lamb	Barratt Homes	This approach seems logical as the creation of more attractive, higher quality facilities is more likely to appeal to users and having the added advantage of reducing management and maintenance costs. These larger sites can also prove beneficial in creating a sense of place and encouraging community cohesion.	Comments noted. Existing Policy BDP25.3 does currently protect designated and undesignated areas of outdoor open space, sport and recreation. Can't find the evidence to suggest why the council are focusing on fewer, high quality open space?
SOI7	80	John	Pearce	Harris Lamb	Bloor Homes	Yes, we agree with this approach in that the facilities that are created are more attractive to users and that the management and maintenance costs are hopefully less as these are less sites to look after. Clearly, with an SUE the size that Frankley could deliver, we would anticipate that this would provide such a facility or facilities within the overall development area.	Comments noted. We will establish the need of the district through appropriate evidence.
SOI7	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	This approach seems logical as the creation of more attractive, higher quality features would be more likely to appeal to users and have the added benefit of reducing management and maintenance costs. Larger sites can also prove beneficial in creating a sense of place and encouraging community cohesion.	Comments noted. Existing Policy BDP25.3 does currently protect designated and undesignated areas of outdoor open space, sport and recreation. Can't find the evidence to suggest why the council are focusing on fewer, high quality open space?
SOI7	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Agree with this approach in that the facilities that are created are more attractive to users and that the management and maintenance costs are hopefully less as there are less sites to look after.	Comments noted. Existing Policy BDP25.3 does currently protect designated and undesignated areas of outdoor open space, sport and recreation. Can't find the evidence to suggest why the council are focusing on fewer, high quality open space?

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SOI7	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Yes agree. Facilities are more attractive to users and maintenance costs are less overall.	Comments noted. We will be able to establish the need of the district through gathering relevant supporting evidence.
SOI7	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	The provision of play areas that are more natural should be considered, rather than the use of specific equipment every time. Areas with fallen trees, soft surfaces such as mulched bark and uneven surfaces with mounding and bowls can offer interesting places encouraging the perception of a 'permission to play' for children of all ages. These tend to blend more effectively with the natural environment and have less of a visual impact. These areas also have less of an effect on wildlife, which benefit from fallen logs, organic surfaces and peripheral areas of woodland. More spaces that encourage children to build dens and create opportunities for imaginative play should be required, particularly on sites located in more rural areas, and on the periphery of larger settlements. Play areas that have different character (such as wooded, marshy, informal open kick about areas) are also important in generating different types of play and risk-taking. Such areas are also cheaper to maintain.	Open space should be taken into account in planning for new development and considering proposals that may affect existing open space which is identified through our existing policy BDP25 and National Planning Policy.
SOI7	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of SOI16 – SOI11, the provision of play areas that are more natural should be considered, rather than the use of specific equipment every time. Areas with fallen trees, soft surfaces such as mulched bark and uneven surfaces with mounding and bowls can offer interesting places encouraging the perception of a 'permission to play' for children of all ages. These tend to blend more effectively with the natural environment and have less of a visual impact. These areas also have less of an effect on wildlife, which benefit from fallen logs, organic surfaces and peripheral areas of woodland. More spaces that encourage children to build dens and create opportunities for imaginative play should be required, particularly on sites located in more rural areas, and on the periphery of larger settlements. Play areas that have different character (such as wooded, marshy, informal open kick about areas) are also important in generating different types of play and risk-taking. Such areas are also cheaper to maintain.	Comments noted. We will establish the need in the district through supporting evidence.
SOI7	113	Gareth	Sibley	RCA Regeneration	CAD Square	The provision of play areas that are more natural should be considered, rather than the use of specific equipment every time. Areas with fallen trees, soft surfaces such as mulched bark and uneven surfaces with mounding and bowls can offer interesting places encouraging the perception of a 'permission to play' for children of all ages. These tend to blend more effectively with the natural environment and have less of a visual impact. These areas also have less of an effect on wildlife, which benefit from fallen logs, organic surfaces and peripheral areas of woodland. More spaces that encourage children to build dens and create opportunities for imaginative play should be required, particularly on sites located in more rural areas, and on the periphery of larger settlements. Play areas that have different character (such as wooded, marshy, informal open kick about areas) are also important in generating different types of play and risk-taking. Such areas are also cheaper to maintain.	Comments noted. Linking Green Infrastructure, sport and recreation and biodiversity is an important consideration and through the evidence we will be able to establish the need and demand within the district.
SOI7	161	Ian	Macpherson		Self	Yes	Comments noted. Existing Policy BDP25.3 does currently protect designated and undesignated areas of outdoor open space, sport and recreation. Can't find the evidence to suggest why the council are focusing on fewer, high quality open space?
SOI7	165	Johanna	Wood			The Council has a clear strategy however is usage limited because of the distance from where people live? Whilst concentrated might mean higher quality is this supported by the number of children who cannot access these locations efficiently? If so strategy is wrong	Comments noted. Supporting evidence we gather will enable us to understand what the need is in the district and plan for this. Open space should be taken into account in planning for new development and considering proposals that may affect existing open space which is identified through our existing policy BDP25 in National Planning Policy.
SOI7	192			Dodford with Grafton Parish Council		Fewer, larger spaces feel more appropriate, but green spaces in town are also helpful.	Comments noted. We will be able to establish the need of the district through gathering relevant supporting evidence.
<b>Q.SOI8: Do you think the plan could do more to protect important open space areas in the District? If so, which particular areas are you concerned about and what do you think the plan could do?</b>							
SOI8	1	Tammy	Williams	Alvechurch Parish Council		Yes, protect community valued views in the landscape.	Comments noted. The landscape character of the district will be assessed as part of our evidence base where valued views in the landscape will be addressed.
SOI8	4	Barry	Spence	Bentley Pouncefoot Parish Council		The Plan should protect areas of open space to maintain the 'gap' between adjoining major settlements such as Redditch and Birmingham.	SOI8 refers to Open space, sport and recreation not Green Belt.
SOI8	17	Stuart	Morgans	Sport England		In respect of SOI8-10 regarding open space, sport and recreation, Sport England supports the content of paragraphs 9.12 and 9.13 that makes the clear link between sport and recreation and fostering a healthier population. As above, the protection of existing sport and recreation facilities, the enhancement of existing facilities to improve the quality of experience for users and the provision of new facilities to meet the needs of Bromsgrove residents over the plan period, including the proposed housing growth should be informed by a robust and up to date evidence base.	Comments noted. The need of the district will be established through a robust evidence base.



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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SOI8	20	P	Harrison	Wythall Parish Council		Lickey Hills country park is managed by Birmingham City Council and is seeing increased levels of inappropriate and anti-social behaviour. The city council should improve its management.	Comments noted. We will communicate this to Birmingham City Council
SOI8	28	Emily	Barker	Worcestershire County Council		- Planned network of blue and green infrastructure Easily accessible natural green space of varying sizes - Safe and easily accessible play areas which are overlooked - Built sports facilities such as swimming pools and sports halls - Community access to schools	Comments noted. In partnership with the County Council and through gathering evidence we will be able to assess the need of the district.
SOI8	34	Sue	Baxter			It is of paramount importance that the plan protects open space, in particular that which is owned by neighbouring authorities, such as the Lickey Hills	Comments noted. Policy BDP25 currently protects existing open space.
SOI8	42			Wythall Residents Association		Lickey Hills Country Park is managed by Birmingham City Council and is seeing increased levels of inappropriate and anti-social behaviour. The city council should improve its management.	Comments noted and will be communicated to Birmingham City Council.
SOI8	72	Stephen	Peters			Lickey Hills country park is managed by Birmingham City Council and is seeing increased levels of inappropriate and anti-social behaviour. The city council should improve its management.	Comments noted and we will communicate this to Birmingham City Council.
SOI8	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Established areas of formal and informal open space should be protected, if they are already used and enjoyed by the community.	Agreed that we will continue to protect and enhance existing open space which is in line with Policy BDP25.
SOI8	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	In respect of SOI16 – SOI11, the provision of play areas that are more natural should be considered, rather than the use of specific equipment every time. Areas with fallen trees, soft surfaces such as mulched bark and uneven surfaces with mounding and bowls can offer interesting places encouraging the perception of a ‘permission to play’ for children of all ages. These tend to blend more effectively with the natural environment and have less of a visual impact. These areas also have less of an effect on wildlife, which benefit from fallen logs, organic surfaces and peripheral areas of woodland. More spaces that encourage children to build dens and create opportunities for imaginative play should be required, particularly on sites located in more rural areas, and on the periphery of larger settlements. Play areas that have different character (such as wooded, marshy, informal open kick about areas) are also important in generating different types of play and risk-taking. Such areas are also cheaper to maintain.	Comments noted. Supporting evidence we gather will enable us to understand what the need is in the district and plan for this. Open space should be taken into account in planning for new development and considering proposals that may affect existing open space which is identified through our existing policy BDP25 and National Planning Policy.
SOI8	113	Gareth	Sibley	RCA Regeneration	CAD Square	Established areas of formal and informal open space should be protected, if they are already used and enjoyed by the community. We support the use of community hubs but would like to know more about it before we could commit to a policy requiring their provision/inclusion in a scheme.	Existing Open space provision will be protected and is supported by policy BDP25. Community hubs operate out of buildings, from which multi-purpose, community-led services are delivered.
SOI8	161	Ian	Macpherson		Self	No	Comments noted.
SOI8	166	John	Gerner			Yes. Protect views around Avoncroft museum. A second formal park is needed as the town expands	Comments noted. We will establish the need of the district through supporting evidence.
SOI8	189	Phil	Pleasant		Self	Expand to include: including natural features and countryside to promote wildlife and diversity and limit the impact of development e.g. trees, hedgerows, etc.	Comments noted and feel that this is most appropriate in the Natural & Historic Environment section.
<b>Q.SOI9: Do you think there need to be more allotment facilities within the District? If so, where?</b>							
SOI9	1	Tammy	Williams	Alvechurch Parish Council		There needs to be more allotment facilities within the north east of the District	Comments noted and we will establish the demand through supporting evidence.
SOI9	2	Gill	Lungley	Barnt Green Parish Council		Yes. There is evidence of demand for more allotment sites in the Barnt Green area.	Comments noted and we will establish the demand through supporting evidence.
SOI9	20	P	Harrison	Wythall Parish Council		If there is a local demand for allotments they should be encouraged.	Comments noted and we will establish the demand through supporting evidence.
SOI9	28	Emily	Barker	Worcestershire County Council		Allotments are an important facility for improving mental health and wellbeing and for promoting a healthy diet. An allotment attached to large developments would give opportunities for whole communities to come together.	Comments noted and we will establish the demand through supporting evidence.
SOI9	34	Sue	Baxter			If there is a need then yes.	Comments noted and we will establish the demand through supporting evidence.
SOI9	42			Wythall Residents Association		If there is a local demand for allotments, they should be encouraged. Wythall Parish Council owns an allotment site which is managed by the users. Other parishes could be encouraged to do the same.	Comments noted and it is useful to learn that the Wythall Allotment is successfully used and managed.
SOI9	72	Stephen	Peters			If there is a local demand for allotments they should be encouraged.	Comments noted and we will establish the demand through supporting evidence.
SOI9	110	Gareth	Sibley	RCA Regeneration	Duchy Homes	Support the use of allotments, community gardens and orchards and will offer them as part of the developments we are promoting. However, feedback from the community in terms of what specifically they may require will be critical in shaping what the scheme may or may not include.	Comments noted and we will establish the demand through supporting evidence.
SOI9	111	Gareth	Sibley	RCA Regeneration	Mr and Mrs Watson	We support the use of allotments, community gardens and orchards and will offer them as part of the developments we are promoting. However, feedback from the community in terms of what specifically they may require will be critical in shaping what the scheme may or may not include.	Comments noted and we will establish the demand through supporting evidence.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SOI11	11	Rosamund	Worrall	Historic England		In terms of new development and open space, or enhancement of existing open space, the Historic Landscape Characterisation information (including urban characterisation) on the Historic Environment Record could be of use in identifying previous land uses which could be incorporated into a scheme or better revealed as an open space feature. It is recommended that this information be considered as part of baseline information as the Plan progresses.	Comments noted. As part of our evidence base we will include a landscape Character assessment.
SOI11	13			Natural England		We would advise that standards should be set in Planning policy. This subject forms another strand of the green and blue infrastructure theme (see above). You may find it useful to refer to the below document which though is now archived, still provides useful and relevant information. Natural England - Nature Nearby - Accessible Natural Greenspace Guidance (NE265) The Local Planning Authority may find it useful to refer to the following Natural England and DEFRA publications: Connection to Nature: evidence briefing Links between natural environment and obesity Links between natural environment and physical activity Links between natural environment and physiological health Links between natural environments and mental health Good practice in social prescribing for mental health: the role of nature-based interventions (NECR228) NECR211 - Is it nice outside? - Consulting people living with dementia and their carers about engaging with the natural environment DEFRA - Evidence Statement in the links between natural environments and human health	Comments noted regarding work that has been undertaken by natural England and Defra.
SOI11	17	Stuart	Morgans	Sport England		Sport England supports the reference in paragraph 9.2 to the importance of creating high quality environments to support its health, social and cultural well-being. The reference in paragraph 9.3 that recognises that new development creates additional demands on existing social infrastructure making it important to plan for the delivery of supporting services is also welcomed. The scope of the key issues set out in paragraph 9.4 are generally supported, particularly the references to health and well-being, good design, improving connectivity, ensuring appropriate facilities are available and accessible and to protect and enhance open space provision. It is recommended that a reference is added to make it clear, for the avoidance of doubt, that this includes the provision of formal sports facilities to include built sports facilities and playing pitches. The reference in paragraph 9.5 to provision of open space sports and recreation as a key issue for the District Plan Review to address is welcomed.	Support from Sport England is noted and welcomed.
SOI11	17	Stuart	Morgans	Sport England			
SOI11	18	Andrew	Morgan	Warwickshire and West Mercia Constabulary		Paragraphs 8, 26, 32 and 92 of the NPPF (2018) together confirm that sustainable development means securing a safe environment through the delivery of social infrastructure needed by communities. In this respect, paragraph 20 specifically states policies should deliver development that makes sufficient provision for security infrastructure. Paragraphs 16, 26, 28, 32 and 38 collectively envisage this being delivered through joint working by all partners concerned with new developments. This is expanded on by paragraph 95 of the NPPF (2018), which states that planning policies should use the most up-to-date information from the police and other agencies about the steps needed in new development to reduce vulnerability, increase resilience and ensure public safety and security. Finally, Annex 2 of the NPPF (2018) defines the police as essential local workers providing frontline services to the public. Despite all of the above, there is no policy or guidance proposed at all by the Issues and Options document concerning the emergency services infrastructure that will be required to support the development growth envisaged by the Review. The lack of recognition of the issue conveys an impression that it is expected that the police and other emergency services will be automatically available at the necessary standards immediately upon completion of a given development scheme and will remain so for as long as the scheme is in existence. If this were indeed the case, there would not be a problem, but it is not unfortunately. Delivering the required emergency services infrastructures needed by new development requires direct policy support from the Local Plan. If there is not, the infrastructure is delivered piecemeal or not at all, which means that it is the ordinary members of the public who live, work and visit these schemes that lose out the most ultimately in the long-term.	Comments noted. The Design SPD references designing out crime however we will ensure that reference to crime and design along with consideration for emergency services infrastructure is considered at this stage and will work in partnership with the emergency services.

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SOI11	18	Andrew	Morgan	Warwickshire and West Mercia Constabulary		Alongside the above, it is also vital there is not a reliance by the forthcoming Local Plan on design measures to address crime and safety issues. Whilst WP and WMP encourage the adoption of Secured by Design in all schemes, it remains true that no matter how well thought-out and implemented design measures will never reduce crime, anti-social behaviour and other incidents by 100%. There will always be times when the police and other emergency services must respond to 999 calls to incidents or events occurring at the scheme in question over the totality of its existence. Delivering these services to the required standard, within acceptable response times, means that infrastructure provision must be hand-in-hand with appropriate design measures. It should not be a false choice between one or the other. Emergency services infrastructure and design should instead be the constituent parts of a single package of measures within a sustainable development to keep people safe, secure and free from unnecessary risk.	Agreed that Emergency services infrastructure and design should be considered as constituent parts along with sustainable development principles.
SOI11	28	Emily	Barker	Worcestershire County Council		- Maintain or enhance opportunities for food production - Avoid overconcentration of hot food takeaways in retail/local centres and near schools/facilities aimed at young people.	Comments noted. Providing education and facilities is important for promoting opportunities for food production. The over concentration of Hot food takeaways is a national issues and it has been addressed through Policy BDP25.6 in the Adopted Local Plan. In gathering robust evidence we will be able to assess any areas in the district where this is an issue.
SOI11	28	Emily	Barker	Worcestershire County Council		Health and wellbeing considerations are much wider than this, and include housing, design, age friendly developments. These considerations should be included within the plan, including through a comprehensive health and wellbeing policy.	Agreed that Health & Wellbeing should consider housing, design and age friendly development.
SOI11	34	Sue	Baxter			The right social infrastructure to support an increasingly ageing population with reduced voluntary help. Most volunteers are pensioners but with the increase in pension age this source will not be so readily available in the future.	Comments noted. This is an important factor in considering inclusive facilities. We will ensure that community facilities are retained where possible and future provision is considered through the plan making process and supported by evidence.
SOI11	71	Stuart	Field			Sports facilities seem to have been missed. Policy BDP17.12 of the current adopted Bromsgrove District Plan says a sports hall should be included as part of the leisure centre. This policy should be carried over. "C. The new leisure centre should contain, a swimming pool, fitness suite, multifunctional studios, sports hall facilities and ancillary uses such as café/ restaurant will also be acceptable;" Sport is proven to reduce adult and child obesity and improve mental well-being	Sports facilities will be considered under Open Space, Sport and Recreation. Comments noted that a sports hall is required and we will look into this as part of the evidence gathering through the local plan review.
SOI11	104	Richard	Fryer			Please consider utilising the Sanders Park bandstand for local bands/musicians over the summer months. Tamworth successfully do this in the castle grounds. The current Sunday performances are great but accommodate a very narrow demographic. Saturday's are ideal. It's a cheap win to provide entertainment and showcase local talent. At present there is little for young people to do or areas for congregation.	Comments noted. We recognise the importance of community events and we will work in partnership with colleagues in leisure regarding your community event suggestion
SOI11	121	Roy	Mee			Infrastructure should be prioritised prior to considering any more development. The school and Doctors are already at capacity.	Comments noted. Through the supporting evidence base we will be able to establish existing capacity and need for future development in the district.
SOI11	161	Ian	Macpherson		Self	Fear of Crime	Comments noted. In partnership with the police and other agencies we will be able to develop policies that assist new developments in aspects of planning out issues of fear of crime.
SOI11	165	Johanna	Wood			Lack of a public Sports Hall at the new Bromsgrove Sports Centre. The negatives with this are that people don't participate in sport at all or have to travel to play which incurs cost and is bad for the environment	Comments noted. Policy BDP17.12 identifies the need for sports hall facilities within the Leisure development opportunity site TC5. We will carry this through the local plan review supported by evidence to establish the need.
SOI11	173	Mary	Rowlands			There is plenty to do if you have transport and funds to access services/facilities.  The libraries are vital and should not be downgraded. Many elderly residents who do not have a computer go to the library for assistance. Children from disadvantaged homes will not be able to consult books to help them with their school work. If volunteers do most of the work, skilled staff will lose jobs - how does this address employment issues?	Comments noted. Facilities in the district need to be accessible for all and we will be able to assess the need for community facilities and services through the supporting evidence base.
SOI11	175	Michael	Waters			Car parking around schools is becoming increasingly difficult for local residents. Please ensure that all new build incorporates off-road drop off/pick up	Comments noted. It is important that parking is a consideration for any new development in particular around schools. This will need to be considered in partnership with the County Council.
SOI11	184	Nina and Ray	Read			Essential adequate social housing factored in and with related facilities - often overlooked by the developers on completion.	Comments noted. Affordable and social housing is an important factor when considering future housing provision. We will ensure that through a robust evidence base we will establish the need of social housing within the district.
SOI11	192			Dodford with Grafton Parish Council		Improved recycling facilities.	Comments noted. We will gather evidence for the provision of recycling facilities in the district.

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<b>Q.NE1: Which of the following approaches do you think we should adopt as we review the District Plan? [For options see Sep 2018 consultation document, p.60]</b>							
NE1	1	Tammy	Williams	Alvechurch Parish Council		Option 1:..... and to consider amending them when national legislation and planning policy renders them out of date or ineffective, together with Option 2: to amend as necessary.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated.
NE1	2	Gill	Lungley	Barnt Green Parish Council		Option 1 – leave the policies as they are.	Noted.
NE1	4	Barry	Spence	Bentley Pauncefoot Parish Council		We would support Option 1.	Noted.
NE1	9	Alexandra	Burke	Hagley Parish Council		See no need to alter the existing policies significantly , but some could usefully be strengthened.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated. Opportunities to strengthen the policies will also be considered.
NE1	13			Natural England		Natural England supports option 2: Rewrite the policies. Since the adoption of the current Local Plan, the NPPF had been revised and the Government's 25 Year Environment Plan has been published. The natural environment policies will need to be revised in order to ensure they are in pace with current thinking.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated.
NE1	15	Fiona	McIntosh	North Worcestershire Water Management		Believe the natural environment and green infrastructure policies are adequate but question whether there is scope to include 'blue infrastructure' and emphasise the amenity value of watercourse within green infrastructure.	Comments welcomed and noted. Opportunities to include 'blue infrastructure' and emphasise the amenity value of watercourse within green infrastructure within the policies and supporting text will also be considered.
NE1	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Support option 2. Neither of the BDP policies is sufficiently up to date to reflect the ambition set out in the 25 year environment plan/revised guidance in NPPF 2. Pleased to discuss further.	Agree, since the plan was adopted in January 2017, the NPPF has been revised/updated and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated.
NE1	20	P	Harrison	Wythall Parish Council		Option 1.	Noted.
NE1	28	Emily	Barker	Worcestershire County Council		Both policies are considered out of date as they don't reflect the government's policy direction under the revised NPPF and the 25 year environment plan. Recommend Option 2 is taken forward. These policies would benefit from additional detail to align better with the Framework.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated.
NE1	34	Sue	Baxter			Option 1.	Noted
NE1	35	Peter	King	Campaign to Protect Rural England		Protecting nature: We do not think it is necessary substantially to rewrite the policies. However, we are concerned that BDP21 does not go far enough. For example, St Modwen have promoted a housing site that extends very close to Upper Bittell Reservoir, which we think is an SSSI or nature reserve. If such development were to take place (and we hope it does not), having housing development almost right up to its banks would be likely adversely to affect its conservation value.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated. Opportunities to strengthen the policies will also be considered.  The Bittell Reservoirs are designated as Sites of Special Scientific Interest (SSSI) and would therefore also benefit from statutory protection.
NE1	42			Wythall Residents Association		Option 1	Noted.
NE1	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	On the basis that additional land needs to be release from the Green Belt to accommodate housing need, it is recommended that an up to date Landscape Assessment is carried out at a more localised level to consider the specific areas of intended growth.	Comments noted. A comprehensive and proportionate evidence base will inform our policy approach for the preferred option. This will include an up-to-date landscape character assessment / landscape visual impact assessment. Landscape, visual amenity and biodiversity will also be considered in Part 2 of the Green Belt Purposes Assessment at a more localised level.
NE1	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	The evidence base should be updated to ensure that any landscape designations, and policies which seek to protect these designations, are reflective of the actual landscape to an acceptable scale. It should be ensured that a balance is reached that protects the landscape, and natural environment, while still allowing for much-needed development to take place. As such, if the updated evidence base reveals differences with the existing, policies should be re-written.	The Council has begun to gather evidence to inform the BDP Review and a comprehensive and proportionate evidence base will inform our policy approaches. Policies will be updated or rewritten if necessary, to reflect any changes in the evidence.
NE1	62	Chontell	Buchanan	First City	Roman Catholic Diocesan Trustees	It is important to review the natural and historic environment as a whole considering all issues which potentially have an impact on the District and plan in a cohesive way. Need to consider the significance of the natural and historic environments on a case by case basis and assess against the overall needs of the District for example, if developed, how sites can incorporate enhanced biodiversity as part of the scheme.	Comments noted. Agree the natural and historic environments are closely linked and both will be considered as part of any site selection/site allocation work.
NE1	72	Stephen	Peters			Option 1	Noted.
NE1	78	Sean	Rooney	Harris Lamb	Barratt Homes	Option 1, if written in accordance with national legislation.	Noted. However, since the plan was adopted in January 2017, the NPPF has been revised and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated.

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NE1	80	John	Pearce	Harris Lamb	Bloor Homes	Option 1. If written in accordance with existing national legislation, there is no need to rewrite them until such time as there is a change in policy or legislation. As such, we do not consider that they need amending at the current time.	Noted. However, since the plan was adopted in January 2017, the NPPF has been revised and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated.
NE1	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Option 1 - if written in accordance with national legislation there is no need to rewrite environmental policies until such time as there is a change in national policy or legislation. Do not consider they need amending at this time.	Noted. However, since the plan was adopted in January 2017, the NPPF has been revised and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated.
NE1	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Option 1. If written in accordance with existing national legislation, there is no need to rewrite them until such time as there is a change in policy or legislation. As such, we do not consider that they need amending at the current time.	Noted. However, since the plan was adopted in January 2017, the NPPF has been revised and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated.
NE1	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Option 1 - don't consider they need amending at this time.	Comments noted.
NE1	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Option 1	Noted.
NE1	134	David	Barnes	Star Planning	Richborough Estates	There is nothing to suggest that the policies concerning green infrastructure and the natural environment need to be amended (Option 1).	Comments noted.
NE1	161	Ian	Macpherson		Self	Option 1 - Strengthen with local policies in NHP	Comments noted. Neighbourhood Plans are able to include more detailed policies, specific to the natural environment of the designated area, for example Alvechurch Policy POLICY HDNE 6: Protection and Enhancement of the Natural Environment, however not all areas are covered by neighbourhood plans.
NE1	165	Johanna	Wood			NE 1: Option 1 NE 2: my answer to NE1 suggests not!	Noted.
<b>Q.NE2: Do you think our current policies are ineffective in any way? If so, how?</b>							
NE2	1	Tammy	Williams	Alvechurch Parish Council		Yes....Enforcement of inappropriate development does not seem to get followed up in a timely manner	Comment noted, however this is a Development Management issue rather than a policy development issue. Comment will be passed on to the Development Management Team.
NE2	13			Natural England		The current policies do not adequately deliver the revised NPPF or the Government's 25 Year Environment Plan. In particular, we would welcome stronger protection for habitats and the delivery of net gain for biodiversity. We recommend stronger references to green infrastructure and the work of the Worcestershire Green Infrastructure Partnership.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated. Opportunities to strengthen the policies and include greater reference to green infrastructure (and the Green Infrastructure Partnership) will also be considered.
NE2	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Both policies need updating to reflect recent changes to guidance on the natural environment. Need to include significantly stronger wording on mapping and delivery of a robust ecological network for the district , biodiversity net gain and overall GI requirements at a site level. Could perhaps follow guidance in the SWDP and reiterate the use of GI Concept Plans. Recommend further engagement with the Worcestershire GI Partnership.	Comments welcomed and noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated and the Government has published its 25 year Plan to Improve the Environment (A Green Future). The policies would therefore benefit from being revised/updated. The detailed policy wording will be revisited when preferred Option work is undertaken. Officers will seek input from the Worcestershire GI Partnership and during policy development.
NE2	20	P	Harrison	Wythall Parish Council		The district is largely rural, and the existing policies appear to be working, even in the urban areas.	Comments noted.
NE2	34	Sue	Baxter			Not that I am aware of	Noted.
NE2	35	Peter	King	Campaign to Protect Rural England		The most important sites accordingly need a cordon sanitaire of undeveloped land to protect them from (for example) thoughtless householders who tip garden waste rubbish over their back fences and in doing so harm the adjacent nature site. BDP 21.2 does this for SSSIs, but this needs to be applied to other designations, including Local nature Reserves.	Comments noted. Opportunities to strengthen the policies in this respect will be considered.
NE2	42			Wythall Residents Association		The district is largely rural, and the existing policies appear to be working, even in the urban areas.	Noted.
NE2	72	Stephen	Peters			The district is largely rural, and the existing policies appear to be working, even in the urban areas.	Noted.
NE2	80	John	Pearce	Harris Lamb	Bloor Homes	No	Noted.
NE2	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	No	Noted.

Bromsgrove District Plan Review  
Issues and Options Representations and Officer Responses

Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
NE2	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	No.	Noted.
NE2	151	Dawn	Macqueen			There is an option missing. Current sections are ineffective and there is a need to implement a five goals listed in section 10.3.	Noted.
NE2	161	Ian	Macpherson		Self	No	Noted.
NE2	165	Johanna	Wood			NE 1: Option 1 NE 2: my answer to NE1 suggests not!	Noted.
NE2	192			Dodford with Grafton Parish Council		Natural and Historic Environments (NE2) – the town does not make enough use of its attractive historic and natural features. The Bromsgrove Society could be approached to help promote the town both for residents and to attract tourists.	Comment noted. Opportunities to strengthen the policies in this respect will be considered, however this is not strictly a policy development issue.
<b>Q.NE3: Do you think our current policies are ineffective in any way? If so, how?</b>							
NE3	1	Tammy	Williams	Alvechurch Parish Council		A Nature Recovery Network, could be implemented where development is located in areas which are less important for nature. It can be used to target activity that will contribute to enhancing biodiversity alongside strategies to ensure development delivers an overall improvement in biodiversity i.e. net biodiversity gain, and protect and enhances populations of highly threatened species such as those highlighted in the evidence background to the emerging Alvechurch Parish Neighbourhood Plan.	Comments noted.
NE3	4	Barry	Spence	Bentley Pauncefoot Parish Council		Policies could help by securing provision of new spaces in new developments and appropriate ongoing management of those as well as of existing open spaces. Not all open space should be 'play space' but a linked network of spaces would help wildlife.	Comments noted.
NE3	9	Alexandra	Burke	Hagley Parish Council		Need a cordon sanitaire of undeveloped land so that development doesn't adversely impinge on the environmental designations.	Comments noted. Opportunities to strengthen the policies in this respect will be considered. Some designated sites, for example SSSIs have Impact Protection Zones.
NE3	13			Natural England		This is a complex question and merits face to face discussions. Natural England would be happy to be a part of this conversation. Worcestershire as a county is in a strong position with regards to biodiversity data. We recommend approaching Worcestershire County Council, Worcestershire Wildlife trust, the Biological Record Centre and the wider Worcestershire Green Infrastructure Partnership, to establish what evidence is already available. Best practice approaches already tried and tested across the county, such as Green Infrastructure Concept Statements for larger development sites, should be further utilised in the county. There are innovative projects happening across the West Midlands, as we would strongly recommend that Bromsgrove explores these in order to share learning. Examples include the Black Country GI-debt tool (Green Infrastructure Digital Evidence Base Tool), work in Warwickshire around biodiversity offsetting and Concept Statements, and the West Midlands Combined Authority's ongoing natural capital investment strategy work. We also recommend reference to the Defra metric.	Comments welcomed and noted. Officers will seek input from WCC and other stakeholders for input into policy development.
NE3	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Urge the Council to engage with stakeholders with a view to progressing the policy agenda as soon as possible. Emerging Local Plan offers a significant opportunity to deliver gains for wildlife. Policies must set a trajectory for demonstrable biodiversity gain through development decisions. Including protection and enhancement of existing assets (including buffering and clarity around the definition and protection of irreplaceable habitats, embedding of preferred metrics to demonstrate how gains have been made, maintenance of evidence against which gains can be judged, mapping of existing assets and maximising opportunities to deliver enhancements. Locational choices are an important on-site consideration and so the site allocations must receive considerable scrutiny in terms of their environmental implications.	Comments welcomed and noted. Officers will seek input from the Worcesterhire Wildlife Trust and other stakeholders for input into policy development.
NE3	20	P	Harrison	Wythall Parish Council		The existing policies are resulting in some biodiversity improvements such as re-introduction of water voles and otters. Wildlife is always considered as part of the planning process.	Comments welcomed and noted.
NE3	28	Emily	Barker	Worcestershire County Council		Suggest that Historic Landscape Characterisation is also added as an evidence base for future design guidance, e.g., where extant pre 19th century field patterns are mapped that have potential for species rich hedgerows, these in turn have the potential to be enhanced as wildlife corridors.	Comments noted. The evidence base will be reviewed and updated where necessary as the plan progresses.
NE3	34	Sue	Baxter			Wildlife is always considered as part of the planning process.	Agree, when sites are allocated/applications are validated.... Constraints/relevant designations are considered etc
NE3	42			Wythall Residents Association		The existing policies are resulting in some biodiversity improvements such as re-introduction of water voles and otters and the proliferation of buzzards. Wildlife is always considered as part of the planning process.	Comments welcomed and noted.
NE3	72	Stephen	Peters			The existing policies are resulting in some biodiversity improvements such as re-introduction of water voles and otters. Wildlife is always considered as part of the planning process.	Comments welcomed and noted.
NE3	161	Ian	Macpherson		Self	Rigorous application of policies	Noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
NE3	165	Johanna	Wood			Can't really comment as I don't know what a Nature Recovery Network is. However, anything that delivers net gains for biodiversity in the District has to be positive and must be supported	Comments noted. Nature Recovery Networks are defined in the NPPF as: "An expanding, increasingly connected, network of wildlife-rich habitats supporting species recovery, alongside wider benefits such as carbon capture, water quality improvements, natural flood risk management and recreation. It includes the existing network of protected sites and other wildlife rich habitats as well as and landscape or catchment scale recovery areas where there is coordinated action for species and habitats".
<b>Q.NE4: Do you think there are any natural environment issues we have missed? If so, please tell us what they are</b>							
NE4	1	Tammy	Williams	Alvechurch Parish Council		A Nature Recovery Network, could be implemented where development is located in areas which are less important for nature. It can be used to target activity that will contribute to enhancing biodiversity alongside strategies to ensure development delivers an overall improvement in biodiversity i.e. net biodiversity gain, and protect and enhances populations of highly threatened species such as those highlighted in the evidence background to the emerging Alvechurch Parish Neighbourhood Plan.	Comments welcomed and noted. Officers will work with organisations such as Natural England and Worcestershire Wildlife Trust to explore this issue when work on policy preparation commences.
NE4	4	Barry	Spence	Bentley Pauncefoot Parish Council		How/where does this link in to the Greenbelt review?	At this stage, it doesn't. As the evidence base starts to take shape, many different resources will be used when policy preparation work commences.
NE4	5	Kevin	Joynes	Beoley Parish Council		Fly tipping doesn't appear to be addressed anywhere within the consultation documents.	Unfortunately fly tipping is not a planning matter to be addressed through a Local Plan. Other Council departments deal with issues of fly tipping in the District.
NE4	8	Nancy	Bailey	Frankley Parish Council		Green areas for reading and picnic would enhance the areas. There are already many lovely open spaces in the area for people to enjoy walks, i.e. Waseley, Clent, Lickey Hills and a new park at Longbridge, so land for accommodation could be utilised without the further provision of large open spaces.	Comments noted.
NE4	9	Alexandra	Burke	Hagley Parish Council		NPPF (Para 170 ) discourages isolated homes in the open countryside, probably ought to extend to buildings of all kinds, unless necessary for agriculture and there is no feasible alternative option. In the context of the Green belt review, specific provision on this is needed.	Comments noted. This will considered in the Housing Policies and High Quality Design SPD as supporting evidence.
NE4	9	Alexandra	Burke	Hagley Parish Council		Additional policies to protect "Valued Landscapes" The Worcestershire Landscape Characterisation Assessment serves well to identify a variety of landscape character types, but it makes no judgements as to which character types are more valuable and which less so. Plan ought to do so with a view to directing development mainly to those areas where it has the least impact on important landscape areas.	The policy recognises that the interaction of the natural and built environment is a key characteristic of the Bromsgrove District. The previous local plan included several policies on landscapes....
NE4	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Recommend that consideration be given to aligning policies to industry best practice guidance. Building with Nature sets helpful benchmarks for GI integration into development. Plan should set in place mechanisms for monitoring outcomes in terms of GI and biodiversity . Tracking outcomes and enforcing against poor implementation of schemes is fundamental to delivering the aspirations of plan policy .	How do we currently monitor outcomes of GI and biodiversity?
NE4	27			Stratford On Avon District Council		SDC notes the reference in the revised NPPF (para.141) to 'positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land'. The review of the BDP is an ideal opportunity to secure net gains in biodiversity, which could have cross-boundary benefits.	Agreed. In line with NPPF paragraph 141, Officers will seek to secure net gains in biodiversity.
NE4	28	Emily	Barker	Worcestershire County Council		Policies should identify and map components of ecological networks, should ensure the network and priority species populations are protected, enhanced and restored. Specific and appropriate indicators of progress against delivering targets should be set to monitor biodiversity change. Policies should recognise and address significant cumulative effects and address inherent risks in mitigation plans. Key role in determining how developments should address effects such as fragmentation of networks, lighting of dark corridors, urban effects, cumulative loss of habitat of farmland species, air pollution and increased predation by pets. Policies should establish the expectations for measurable net gain contributions and establish a transparent system for demonstrating how net gain has been delivered. The Plan should identify appropriate and costed off site biodiversity measures and seek proportional contributions from developers via S106 agreements Policies should set standards for green infrastructure to help deliver agreed biodiversity targets. Reasoned justification should signpost readers to existing benchmarks and toolkits. The expectation of a specific quantum of GI for different types and scales of developments should be articulated within the Plan. Preparation of GI Concept Plans	Happy to work alongside relevant Officers/specialisms at WCC to set biodiversity targets etc. Officers recognise the benefit of GI Concept plans and would be keen to work together with the GI Partnership to develop concept plans for key sites within the district/sites which would benefit. A GI Concept plan for one of the strategic sites - Perryfields? Was it useful?? Ask DM officer - Dale?
NE4	34	Sue	Baxter			Not that I am aware of	Noted



**Bromsgrove District Plan Review**  
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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
NE4	35	Peter	King	Campaign to Protect Rural England		The most important sites accordingly need a cordon sanitaire of undeveloped land to protect them from (for example) thoughtless householders who tip garden waste rubbish over their back fences and in doing so harm the adjacent nature site. BDP 21.2 does this for SSSIs, but this needs to be applied to other designations, including Local nature Reserves.	Comments noted. Opportunities to strengthen the policies in this respect will be considered.
NE4	35	Peter	King	Campaign to Protect Rural England		Protecting landscapes: The present policy gives lip-service to protecting landscape character, citing the Worcestershire Landscape Character Assessment, apparently as the only test. That is a useful document, but it only classifies landscapes into a series of types. NPPF para 170 requires BDC; •to protect and enhance valued landscapes and •to recognise the intrinsic character and beauty of the countryside. The wording of BDP21 refers to the distinctive landscape character. Neither it nor Worcestershire Landscape Character Assessment identifies which landscape types are valuable and thus need particular protection and which are comparatively mundane and are thus in less need of protection. We would suggest that the distance from which a particular piece of landscape can be seen is an indication of its importance. Thus a hill that is visible from several miles away is much more important than a field in flat country. Unless the new BDP clearly indicates which landscape types are valuable, it will be almost impossible for BDC to refuse planning applications on the grounds of its impact on the landscape.	Landscape Assessment to be commissioned Why were the Landscape Protection Areas in the 2004 BDP
NE4	35	Peter	King	Campaign to Protect Rural England		BDC's 2004 Plan defined certain parts of the district as Landscape Protection Areas. As they were also Green Belt, they probably had little impact on the question of what development too place. However, in the context of a Green Belt Review, the landscape impact of developing particular parcels of land needs to be assessed as part of the site selection process and policies in support of this added to the Plan. We do not necessarily support all the areas designated under the 2004 Plan, but protection is needed for the Clent and Lickey Hills (the whole range); perhaps also for the hill slopes forming the sides of the Arrow valley (certainly including Wast Hill and Weatheroak Hill. In this connection, we would cite the planning application by Gladman to Wyre Forest District Council (WF 16/0550) for housing development on the east side of Bewdley, where a local action group were able to persuade the District Council to refuse the application on landscape impact grounds. This was upheld on appeal when the council employed the objector's expert. Gladman were refused leave to apply for a Judicial Review.	Landscape Protection Areas were designated in the 2004 BDLP by the District Council, where it was considered that the character and the quality of the countryside merited special protection. These areas were based on the Areas of Great Landscape Value originally defined in the County Development Plan for Worcestershire.  What happend to these designations?  Landscape Assessment to be commissioned - will pick up areas that need special protection?
NE4	146	Charlotte	Quirck			Flood plains being utilised for housing	Comments noted. Flooding is addressed in Policies BDP22 and BDP23. In partnership with the Lead Local Flood Authority (WCC) and the Environment Agency we will ensure that Flooding is addressed through the relevant policies and supported by evidence.
NE4	161	Ian	Macpherson		Self	Possible BAP protected areas?	Comments welcomed and noted. Officers will work with organisations such as Natural England and Worcestershire Wildlife Trust to explore this issue when work on policy preparation commences.
NE4	165	Johanna	Wood			There is no reference to Flooding issues or Tree Protection Orders in the Natural Environment section	Flooding covered in Policy BDP22 Climate Change and BDP23 Water Management. No mention of Tree Preservation Orders
NE4	191	R S	Counter			Propose a small country park should be created - North Bromsgrove Country Park - with footpath and cycleway access only. No cars or parking on site. It should consist of the Managed Land of the Norton Farm development with the land retained by Gallagher Estates, together with open farmland on the northern boundary and a very old arboretum formerly of Barnsley Hall grounds. Obviously land ownership is an issue, but in the development of a long term project for the public good, donation of land may be available. Also over time purchase of associated land coming up for sale, would give even greater access for visitors in the future. Groups of volunteers could possible by organised to help with maintenance of the project and a permanent asset for North Bromsgrove could be created. I estimate that probably fifty or more people walk around these fields each day at the moment, enjoying fresh air and exercise and it would be a great loss if further housing development spoiled such a much loved site.	Comments welcomed and noted. Officers will work with organisations such as Natural England, Worcestershire County Council and Worcestershire Wildlife Trust to explore this issue when work on policy preparation commences.
NE4	193	Tony	Helliwell	Hagley Neighborhood Plan Working Group		Urgent attention to promote the Tree Preservation Order programme. Consider blanket cover during appraisal period. Stringent policies for replacement by semi mature stock where trees are removed without approval.	Comments welcomed and noted. Officers will work with organisations such as Natural England, Worcestershire County Council and Worcestershire Wildlife Trust to explore this issue when work on policy preparation commences.
<b>Q.HE1: Which of the following approaches do you think we should adopt as we review the District Plan? [For options see Sep 2018 consultation document, p.62]</b>							
HE1	1	Tammy	Williams	Alvechurch Parish Council		Option 1: Leave the policy as it is if it is fit for purpose and only consider amending it when national legislation and planning policy renders it out of date	Comments noted.
HE1	2	Gill	Lungley	Barnt Green Parish Council		Option 1 – leave the policies as they are.	Noted.
HE1	4	Barry	Spence	Bentley Pauncefoot Parish Council		We would support Option 1.	Noted.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
HE1	9	Alexandra	Burke	Hagley Parish Council		See no need to alter the existing policies significantly , but some could usefully be strengthened.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated. Agree a review of the policies is needed in light of the revised framework and policies updated and if necessary. Opportunities to strengthen the policies will also be considered.
HE1	11	Rosamund	Worrall	Historic England		Policy BDP20: Managing the Historic Environment is comprehensive and recent. As such, it seems reasonable to retain the policy in its current form with possibly some wording tweaks to sit in line with new NPPF terminology (e.g. 'sustaining' or 'conserving' instead of 'preserving' when referring to heritage assets in general).	Comments noted. Officers will seek to ensure that wording in policies are in line with the terminology used in the NPPF.
HE1	12	Lisa	Winterbourn	Lickey and Blackwell Parish Council		Lickey and Blackwell Parish Council would support option 1	Noted.
HE1	20	P	Harrison	Wythall Parish Council		Option 1.	Noted.
HE1	28	Emily	Barker	Worcestershire County Council		Recommend leaving the Policy as it is	Noted.
HE1	34	Sue	Baxter			Option 1.	Noted.
HE1	42			Wythall Residents Association		Option 1	Noted.
HE1	45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey	Option 2 - the Policy should be rewritten in line with Section 16 of the revised NPPF.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated. A complete rewrite of the policies is not considered to be required at this stage, although agree a review of the policies is needed in light of the revised framework and policies updated if necessary.
HE1	54	Katherine	Else	Claremont Planning	Miller Homes	The existing policy in regard to Historical Environment and Heritage Assets is appropriate in attributing weight in the protection of such aspects of the built environment through development management. Heritage Assets and Historical Environments are not merely physical aspects that are solely engaged through site location, rather they produce a milieu that is experienced through an array of senses.	Comments welcomed and noted. Officers agree that the value of heritage assets and the historic environment goes beyond the physical buildings and structures. The existing policy does acknowledge this to an extent, but perhaps the policy could be expanded on/strengthened in this area.
HE1	72	Stephen	Peters			Option 1	Noted.
HE1	78	Sean	Rooney	Harris Lamb	Barratt Homes	Option 1. As per the environmental policies, the heritage policies only need updating or re-writing if national legislation or planning policy changes.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated. Agree a review of the policies is needed in light of the revised framework and policies updated if necessary.
HE1	80	John	Pearce	Harris Lamb	Bloor Homes	Option 1. As per the environmental policies, they only need updating or rewriting if there has been a change in national legislation or planning policy. A review, in light of the updated Framework, may be necessary, although we don't envisage this would necessitate a wholesale rewrite.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated. Agree a review of the policies is needed in light of the revised framework and policies updated if necessary.
HE1	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Option 1 - as per the environmental policies, the heritage policies only need rewriting or updating if there has been a change in national policy or legislation. A review in light of the updated NPPF may be necessary, although don't envisage this would be a wholesale rewrite.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated. Agree a review of the policies is needed in light of the revised framework and policies updated if necessary.
HE1	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	Option 1 - They only need updating or rewriting if there has been a change in national legislation or planning policy. A review, in light of the updated Framework, may be necessary, although we don't envisage this would necessitate a wholesale rewrite.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated. Agree a review of the policies is needed in light of the revised framework and policies updated if necessary.
HE1	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Option 1. A review in light of the updated Framework may be necessary, although wouldn't envisage a wholesale rewrite.	Comments noted. Since the plan was adopted in January 2017, the NPPF has been revised/updated. A complete rewrite of the policies is not envisaged to be required at this stage, although agree a review of the policies is needed in light of the revised framework and policies updated if necessary.
HE1	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Option 1	Noted.
HE1	161	Ian	Macpherson		Self	Option 1 - strengthen with local policies in NHP	Noted. Neighbourhood Plans are able to include more detailed policies, specific to the heritage of the designated area, for example Alvechurch Policy HDNE 1: Built Heritage and Local Character and Policy HDNE 2: Local Distinctiveness. It should be noted however, that not all areas are covered by neighbourhood plans.
HE1	165	Johanna	Wood			HE 1: Option 1	Noted.
<b>Q.HE2: Do you think our current policy is ineffective in any way? If so, how?</b>							
HE2	2	Gill	Lungley	Barnt Green Parish Council		Yes. The completion of the documentation for the Barnt Green Conservation Area is long overdue. It needs finishing.	There are 12 conservation areas in Bromsgrove District, of which six have Character Appraisals and Management Plans. There is no statutory requirement to have an appraisal, however the Conservation Area boundaries will be reviewed from time to time in line with the Planning (Listed Building & Conservation Areas) Act 1990. Character Appraisals and Management Plans will be produced for the remaining Conservation Areas (including Barnt Green) as resources become available.
HE2	20	P	Harrison	Wythall Parish Council		No.	Noted.



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HE2	28	Emily	Barker	Worcestershire County Council		The Policy is strong. Strengthened by the inclusion of additional toolkits and guidance in Table 6.	Comments welcomed and noted. Officers will seek to ensure that the review of the plan includes an updated table similar to Table 6 in the adopted BDP.
HE2	42			Wythall Residents Association		No	Noted.
HE2	72	Stephen	Peters			No	Noted.
HE2	80	John	Pearce	Harris Lamb	Bloor Homes	No	Noted.
HE2	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	No	Noted.
HE2	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	No	Noted.
HE2	161	Ian	Macpherson		Self	No	Noted.
HE2	165	Johanna	Wood			HE 2: No	Noted.
<b>Q.HE3: Do you think there are any historic environment issues we have missed? If so, please tell us what they are</b>							
HE3	4	Barry	Spence	Bentley Pauncefoot Parish Council		There is potential for some historic buildings (e.g. listed dwellings) to deteriorate due to the costs of maintenance. The Council could consider potential changes of use of such a building that would preserve the structure but bring it back into use. The Council could also strengthen its enforcement of breaches of regulations.	Existing policy BDP20.5 encourages proposals which secure the future of heritage assets, particularly those at risk, and supports the sensitive reuse of redundant historic buildings.  Any breaches or regulations are investigated as and when they are reported to the Council.
HE3	11	Rosamund	Worrall	Historic England		The key sustainability issues for the historic environment are set out sufficiently in Para 10.9 of the Issues and Options document. It is recommended that similar text to that in the Adopted Plan is included in the emerging Plan since it clearly sets out important elements of the District's local character and distinctiveness and it will be important to continue to highlight what is special about the place in the new Plan.	Comments welcomed and noted. Officers will seek to ensure that similar text to what's in the adopted BDP is included in the review of the plan.
HE3	20	P	Harrison	Wythall Parish Council		No.	Noted.
HE3	28	Emily	Barker	Worcestershire County Council		Issues around the incorporation of 20th Century Heritage into the policy. Discussion around including a new policy on tourism, focusing on promoting the heritage of the district, linking up the heritage offer and managing development to enhance that offer and create opportunities for economic growth in this area.	Comments noted. As part of the review, Officers could look to incorporate 20th Century Heritage and heritage tourism in the policy/supporting text.
HE3	34	Sue	Baxter			No.	Noted.
HE3	42			Wythall Residents Association		No	Noted.
HE3	72	Stephen	Peters			No	Noted.
HE3	161	Ian	Macpherson		Self	no	Noted.
HE3	192			Dodford with Grafton Parish Council		Managing an historic environment – Dodford. The Chartist Settlement needs protection to preserve the remaining character it has, ideally by implementing an Article 4 on the area.	Comments noted. The Chartist settlement of Dodford is protected by a conservation area designation. A number of the buildings within the conservation area are listed buildings, and are therefore protected under the Planning (Listed Building & Conservation Areas) Act 1990. The Dodford Conservation Area Character Appraisal and Management Plan were updated in December 2018. It lists a number of properties that have potential to be included on the Local Heritage List and work on the list has started in line with the Local Heritage List Strategy.  It is agreed that Article 4 directions can be a useful tool to protect any non-designated heritage assets and this may also be considered for some properties within the settlement.
<b>Q.CC1: Which of the following approaches do you think we should adopt as we review the District Plan? [For options see Sep 2018 consultation document, p.65]</b>							
CC1	1	Tammy	Williams	Alvechurch Parish Council		Option 1: Leave the policies as they are if they are fit for purpose and only consider amending them when national legislation and planning policy renders them out of date.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	2	Gill	Lungley	Barnt Green Parish Council		Option 1 – leave the policies as they are.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
CC1	4	Barry	Spence	Bentley Pauncefoot Parish Council		We would support Option 1.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	9	Alexandra	Burke	Hagley Parish Council		See no need to alter the existing policies significantly , but some could usefully be strengthened.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	13			Natural England		Natural England supports option 2: Rewrite the policies. Since the adoption of the current Local Plan, the NPPF has been revised and the Government's 25 Year Environment Plan has been published. The climate change and water resource policies will need to be revised in order to ensure they are in pace with current thinking.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	15	Fiona	McIntosh	North Worcestershire Water Management		Would welcome a reference to the 2017 BDC SuDS Design and Evaluation Guide.	Comments are noted. A policy hook to the BDC SuDS Design & Evaluation Guide will be considered further when developing the Preferred Option.
CC1	15	Fiona	McIntosh	North Worcestershire Water Management		Suggest that BDP23 is expanded in line with RBC and WFDC plans, to be more prescriptive in terms of flood risk, sustainable drainage, water quality and discharge rates from new developments.	Comments are noted. Policy BDP.23 will be updated in accordance with the latest guidance to inform the Preferred Options development.
CC1	15	Fiona	McIntosh	North Worcestershire Water Management		NWWM happy to put forward some suggested policies/revisions	Further input from NWWM would be welcomed in the development of the Preferred Options
CC1	16	Rebecca	McLean	Severn Trent		Option 1: The policies regarding Water Management should be continued.  In addition to this, for new developments we would not expect surface water to be conveyed to our foul or combined sewage system unless clear evidence is supplied to show there is no other viable option.  Where practicable, we support the removal of surface water already connected to the foul or combined sewer.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	19	Steven	Bloomfield	Worcestershire Wildlife Trust		Recommend that both policies are redrafted where necessary to reflect the latest NPPF wording and emerging aspirations in the 25 year Environment plan.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	20	P	Harrison	Wythall Parish Council		Option 1.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	34	Sue	Baxter			Option 1.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	38	Sue	Green	Home Builders Federation		The LPR should review the adopted Climate Change and Water Resource policies to re-consider if they remain fit for purpose and consistent with national policy. If not then the policies should be rewritten.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	42			Wythall Residents Association		Option 1	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	72	Stephen	Peters			Option 1	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.

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CC1	78	Sean	Rooney	Harris Lamb	Barratt Homes	Option 1. If written in accordance with existing national legislation, there is no need to rewrite policies until such time as there is a change in national policy or legislation. As such we do not consider that they need amending at the current time.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	80	John	Pearce	Harris Lamb	Bloor Homes	Option 1. If written in accordance with existing national legislation, there is no need to rewrite them until such time as there is a change in policy or legislation. As such, we do not consider that they need amending at the current time.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	82	Sean	Rooney	Harris Lamb	Stoke Prior Developments	Option 1 - if written in accordance with national legislation there is no need to rewrite policies until such time as there is a change in national policy or legislation. Do not consider they need amending at this time.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	If written in accordance with existing national legislation, there is no need to rewrite them until such time as there is a change in policy or legislation. As such, we do not consider that they need amending at the current time.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	Option 1. Do not consider that they need amending at the current time.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	107	John	Jowitt	PJ Planning	Bromsgrove Golf Course	Option 1	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	134	David	Barnes	Star Planning	Richborough Estates	There is nothing to suggest that the policies concerning climate change and water resources need to be amended (Option 1).	Support is noted.
CC1	161	Ian	Macpherson		Self	Option 2 - adopt Code for Sustainable Homes etc - probably go for Level 5 or equivalent	Comments are noted. The Level of the Code for Sustainable Homes to be adopted will need to be subject to viability testing to ensure that policies will be deliverable.
CC1	165	Johanna	Wood			Option 1	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC1	176	Mr & Mrs J D	Winslow			On first reading, options 1 and 2 seem diametrically opposed – leave the policies as they are or rewrite the policies. The full wording of Option 1, however, seems to offer varying degrees of interpretation. We suggest that the emphasis would be better placed on the fact that the plan is undergoing review and that therefore the opportunity is being taken to revisit this topic in the light of the most recent scientific evidence. The stress would then be clearly on “fit for purpose” rather than “leave the policies as they are” - on action rather than inaction. A wholesale rewriting, as Option 2 suggests, is regarded as unnecessary.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
<b>Q.CC2: Do you think our current policies are ineffective in any way? If so, how?</b>							
CC2	13			Natural England		The current policies may not adequately deliver the revised NPPF of the Government's 25 Year Environment Plan.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also the Government's 25 Year Environment Plan prior to developing the Preferred Option.
CC2	20	P	Harrison	Wythall Parish Council		No.	Support is noted.

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CC2	28	Emily	Barker	Worcestershire County Council		Policy BDP22 could be strengthened by being more prescriptive. Taking into consideration the projected changes in Worcestershire's climate, the following measures could be considered: - Wide gutters with emergency overflow points - Outdoor shading to make spaces usable in hotter weather. Providing flexible shading to windows - Provision of green space can help to provide more natural cooling of built up areas. - Water butts to enable rainwater harvesting. - Consideration of green/sedum roofs to slow run off.	Comments are noted and will be further considered in the the review of Climate Change policy and its reasoned justification.
CC2	34	Sue	Baxter			No.	Support is noted.
CC2	42			Wythall Residents Association		No	Support is noted.
CC2	72	Stephen	Peters			No	Support is noted.
CC2	80	John	Pearce	Harris Lamb	Bloor Homes	No	Support is noted.
CC2	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	No	Support is noted.
CC2	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	No.	Support is noted.
CC2	161	Ian	Macpherson		Self	Yes - new development isn't using renewable energy and water saving etc. as it should	These comments are noted and updated guidance relating to renewables and water conservation will be taken into account when re-assessing the Climate Change and Water Resources policies to develop the Preferred Option.
CC2	165	Johanna	Wood			Don't Know	Comments are noted.
<b>Q.CC3: Do you think we have any air quality issues from other pollutants within the District? If so, how should we address them?</b>							
CC3	1	Tammy	Williams	Alvechurch Parish Council		Unsociable odours and noise create huge issues when located close by to residential properties, businesses creating such nuisance should not receive licences to operate in local residential areas: existing businesses should be made to operate responsibly or locate elsewhere...an example of this is Mayfield Farm at Hopwood.	Comments are noted. This is an important consideration in locating new employment and residential uses to ensure that pressure is not created on existing businesses due to impact on residential amenities.
CC3	4	Barry	Spence	Bentley Pauncefoot Parish Council		We do not feel able to make any recommendations on this question.	Noted.
CC3	13			Natural England		Consideration should also be given to ammonia emissions from farming practices such as intensive poultry units.	Comments are noted. This issue will be further considered through the development of Preferred Option.
CC3	20	P	Harrison	Wythall Parish Council		Noxious discharges from animal rendering plants require addressing as they lead to friction and reduced quality of life for neighbours.	Comments are noted. This issue will be further considered through the development of Preferred Option.
CC3	34	Sue	Baxter			Noxious discharges from animal rendering plants require addressing as they lead to friction and reduced quality of life for neighbours.	Comments are noted. This issue will be further considered through the development of Preferred Option.
CC3	42			Wythall Residents Association		Noxious discharges from animal rendering plants require addressing as they lead to friction and reduced quality of life for neighbours.	Comments are noted. This issue will be further considered through the development of Preferred Option.
CC3	72	Stephen	Peters			Noxious discharges from animal rendering plants require addressing as they lead to friction and reduced quality of life for neighbours.	Comments are noted. This issue will be further considered through the development of Preferred Option.
CC3	80	John	Pearce	Harris Lamb	Bloor Homes	No	Noted.
CC3	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	No	Noted.
CC3	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	No	Noted.
CC3	145	C	Birrell			When destroying green land do you ever think about air pollution?	Comments Noted. Any sites to be allocated for future development are assessed against a robust evidence base and sustainability appraisal which takes into consideration air pollution issues.
CC3	161	Ian	Macpherson		Self	No but AQ in Hagley also of concern	Comments Noted. Any sites to be allocated for future development are assessed against a robust evidence base and sustainability appraisal which takes into consideration air pollution issues.
<b>Q.CC4: Do you think there are any climate change and water resource issues that we have missed? If so, please tell us what they are</b>							
CC4	6	Rebekah	Powell	Catshill and North Marlbrook Parish Council		This was considered to be an important issue and impacts on the parish primarily in respect of poor air quality.	Comments Noted. Any sites to be allocated for future development are assessed against a robust evidence base and sustainability appraisal which takes into consideration air pollution issues.
CC4	7	Mark	Davies	Environment Agency		We are currently updating information which will help support your WCS in relation to the identification of areas where higher water efficiency may be required i.e. to reinforce and/or build upon current requirements for Batchley and Bow Brook catchments in your adopted plan.	This information will be useful. It will be important for an update to the Strategic Flood Risk Assessment to help inform revised policies in relation to flooding.

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CC4	13			Natural England		Due to the recent high court judgement (the Wealden ruling <a href="http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html">http://www.bailii.org/ew/cases/EWHC/Admin/2017/351.html</a> ) your authority should consider the cumulative /in-combination effects of increased traffic within the district and neighbouring authorities on designated sites. NE has produced guidance on how to consider in-combination effects of increased traffic which can be found here <a href="http://publications.naturalengland.org.uk/publication/4720542048845824">http://publications.naturalengland.org.uk/publication/4720542048845824</a> .	Comments are helpful. This information is welcomed and will be referred to in the emerging site selection process.
CC4	20	P	Harrison	Wythall Parish Council		The vulnerability of low-lying properties to flooding from surface water is an issue that planners need to address by ensuring that ground floor levels are related to external paving and highway levels.	Comments in relation to increased surface water flooding are noted. It will be important for an update to the Strategic Flood Risk Assessment to help inform revised policies in relation to flooding.
CC4	28	Emily	Barker	Worcestershire County Council		Improving air quality and reducing CO2 emissions - Protection from other forms of pollution, such as noise -Flood protection and water quality/quantity management - Sustainable design techniques - Waste collection and minimisation/recycling	Comments are noted and agreed.
CC4	29	Daniel	Atiyah	Wyre Forest District Council		In regards to climate change and water resources, the District Plan review will need to take into account the 2016 Environment Agency's climate change allowances for peak river flows. Bromsgrove district falls within the Severn River Basin District. The review of the plan will also need to be in conformity with the revised NPPF (Paragraph 149) with a greater emphasis on climate change in 'taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures'.	Comments are noted. Further to the adoption of the Revised NPPF in 2019, the Climate Change & Water Resources Policies will be re-assessed against the revised national guidance and also through an update to the Strategic Flood Risk Assessment .
CC4	31	Rachel	Jones	Better Environment Theme Group		We need to have specific renewable targets not and up to or encouraged needs to be a specific amount	Comments are noted. Targets in relation to renewable energy will also need to be informed through viability testing to ensure that they will be deliverable over the plan period.
CC4	31	Rachel	Jones	Better Environment Theme Group		Water resource issue – water usage, storage, ground water quality.	Comments are noted. This issue will be further considered through the development of Preferred Option.
CC4	31	Rachel	Jones	Better Environment Theme Group		Concerns around AQMA – need for cross links with county council transport plans. Concerns that transport plans lack ambition.	Comments are noted and agreed
CC4	31	Rachel	Jones	Better Environment Theme Group		Flooding- are we future planning for this?Wider catchments and impacts further a field. Consideration of surface water run off.	Comments in relation to increased surface water flooding are noted. It will be important for an update to the Strategic Flood Risk Assessment to help inform revised policies in relation to flooding.
CC4	31	Rachel	Jones	Better Environment Theme Group		Need to be more energy sustainable, need to liaise with Western Power Distribution. We also need to ensure that the district is developing and extending its heat networks.	Comments are noted. This issue will be further considered through the development of Preferred Option.
CC4	31	Rachel	Jones	Better Environment Theme Group		The LEP are currently developing an Energy Strategy which contains a detailed evidence base highlighting both emissions per district but also the potential for renewable energy production across the district. This document also looks at the grid infrastructure and highlights the weaker 'grid' areas.	This information will be useful and will be considered as part of the evidence base to inform the development of preferred options.
CC4	31	Rachel	Jones	Better Environment Theme Group		We would like to see further development of Renewable energy not just on housing stock but use of renewables on sites that are not appropriate for other use. E.g. landfill sites.	Comments are noted. Targets in relation to renewable energy will also need to be informed through viability testing to ensure that they will be deliverable over the plan period.
CC4	32	Robert	Spittle	Bromsgrove Economic Theme Group		The District's adoption of alternative fuel technologies is poor and does not support AQMA.	Comments are noted.
CC4	34	Sue	Baxter			I don't think we fully understand the impact of climate change yet as was evidenced by the recent flooding in Wythall. The plan need to be flexible in that it can adapt to the latest evidence of climate change	Comments are noted. This issue will be further considered through the development of Preferred Option.
CC4	42			Wythall Residents Association		The vulnerability of low-lying properties to flooding from surface water is an issue that planners need to address by ensuring that ground floor levels are related to external paving and highway levels. This was evident during the flash floods in May 2018 in Wythall and Hollywood.	Comments in relation to increased surface water flooding are noted. It will be important for an update to the Strategic Flood Risk Assessment to help inform revised policies in relation to flooding.
CC4	72	Stephen	Peters			The vulnerability of low-lying properties to flooding from surface water is an issue that planners need to address by ensuring that ground floor levels are related to external paving and highway levels.	Comments in relation to increased surface water flooding are noted. It will be important for an update to the Strategic Flood Risk Assessment to help inform revised policies in relation to flooding.
CC4	80	John	Pearce	Harris Lamb	Bloor Homes	No.	Noted.
CC4	83	Patrick	Downes	Harris Lamb	Willowbrook Garden Centre	No	Noted.
CC4	84	Patrick	Downes	Harris Lamb	Worcestershire Health and Care NHS Trust	No.	Noted.
CC4	161	Ian	Macpherson		Self	Must be contaminated land issues on old industrial sites and a specific policy would be appropriate.	Noted. Contaminated Land issues will be considered through the site selection process and through consultation with Worcestershire Regulatory Services.

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CC4	165	Johanna	Wood			Prioritisation of Renewable energy in all new developments	Comments are noted. Targets in relation to renewable energy will also need to be informed through viability testing to ensure that they will be deliverable over the plan period.
CC4	173	Mary	Rowlands			Renewable energy on all new homes. Home should not be built in areas liable to flooding. If development is distant from amenities, additional car journeys would cause pollution.	Comments are noted and agreed
CC4	175	Michael	Waters			Reliance on fossil fuels is being discouraged. Why not make mandatory changes to planning requirements so that technology such as solar panels must be incorporated in new build projects?	Comments are noted. Mandatory changes relating to policy requirements will need to be informed by viability testing to ensure that they are deliverable.
CC4	176	Mr & Mrs J D	Winslow			We are uncertain about the extent to which climate change and water resource issues are adequately covered in your policies. The SSM (table 3) only refers to flood constraints but we note, for example, the Planning Inspector's concern (para.129) that the water resources at Foxlydiate need stronger safeguards and your consequent recognition of "the continued need for aquifer protection" (BDP 11.1). Given the stress on these topics in NPPF, 2018 (paras. 149 and 170) and the impact of this on, for example, the work and planning of the Environmental Agency, Water Boards and Highway Authorities, we would expect the review to address up to date information regarding these topics.	Comments are noted. These issues will be further considered through the emerging evidence base and also to inform site selection, where Source Protection Zones will also be taken into consideration.
<b>Representations received on the Sustainability Appraisal</b>							
SA	11	Rosamund	Worrall	Historic England		Welcomes SA Objectives 7 and 8 and the associated guide questions (and as set out in Table 4.1).	Comments noted.
SA	11	Rosamund	Worrall	Historic England		Table NTS 2 - The scoring system set out in the table is appropriate and provides for uncertain outcomes to be clearly identified. As such, there is opportunity to highlight areas where further work may be required in respect of the Plan's soundness as the Plan progresses.	The comments are welcomed.
SA	11	Rosamund	Worrall	Historic England		Table NTS 3 - It is noted that the compatibility matrix indicates uncertainty in relation to SAO 7 and SAO 8 and the Draft Plan SO1 'regeneration of Bromsgrove town centre'. As indicated earlier (Draft Plan Q.TC 8 response) the Council may wish to consider exploring options in relation to connectivity with the town centre in respect of the historic environment e.g. creating a sense of arrival at the railway station, undertaking public realm improvements and looking at ways to enhance the quality of public space. It is expected that uncertainties highlighted at present for housing and economic growth (Draft Plan SO4 and SO5) will be addressed through site assessment work in order to establish relevant criteria based site allocation policies where relevant in addition to relevant general development management policies. This is also expected to follow in respect of the uncertainties highlighted for SAO8 Cultural Heritage in Table NTS 4 and Table 5.2.	Comments noted. Significant improvements have been made in recent years at Bromsgrove train station, however it's separation from the town centre limit the ability to create a distinctive sense of arrival. Agree with the comments made regarding the uncertainties shown when SO4, SO5 and the Broad Options for Development Distribution were appraised.
SA	11	Rosamund	Worrall	Historic England		Table NTS 5 - Historic England welcomes the recommendation for the District Plan to be informed by Heritage Impact Assessment of potential sites. However, if a rigorous site assessment for the historic environment is undertaken in line with the methodology set out in HEAN3 < <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a> > Heritage Impact Assessments may not necessarily be required for all potential development sites, including any sites proposed for safeguarding as a result of the Green Belt review, but only for those where uncertainty of harm to heritage assets or setting, or uncertainty about what the heritage asset it if buried unknown archaeology, still exists.	Comments noted. This matter will be considered further when potential sites for allocation emerge and their proximity to and potential impact on heritage assets is known.
SA	11	Rosamund	Worrall	Historic England		Would recommend inclusion of, and reference, to the Government's 25 year environment plan (2018) and its Heritage Statement 2017, HE's Advice Note 3 (HEAN 3) on site allocations in local plans, HE's Heritage at Risk register and HE's Heritage Counts document in addition to the PPP's cited at national level.	Comments noted. These documents will be considered for inclusion in the Plans and Programmes section of the SA when it is revisited prior to Preferred Options.
SA	11	Rosamund	Worrall	Historic England		Section 3 - Para 3.6.19 Key Sustainability Issues - The list of key sustainability issues set out in relation to the historic environment are welcomed. This is also recognised within Table 3.22.	Comments noted.
SA	13			Natural England		SA Objective 6: Biodiversity This objective has the potential for a positive relationship with SO6 – Sustainable modes of travel and modal shift. The application of a green infrastructure type approach could help to achieve this. There is the potential for a positive relationship with SO7 – Improving quality of life. Chapter 3 of the 25 Year Environment Plan sets out the governments aspirations for this interrelationship. The application of a green infrastructure type approach could help to achieve this. There is the potential for a positive relationship with SO11 – High Quality Design of New Developments. The application of a green infrastructure type approach could help to achieve this. See Building with Nature.	Detailed comments on the compatibility matrix are welcomed. The potential for positive impacts will become more apparent as policies are drafted and these considerations are taken on board.
SA	13			Natural England		Table NTS.4 Summary of SA of the Broad Options for Development Distribution Unfortunately this table does not look to have a key. We would question some of the rating given. Particularly the neutral ratings for landscape.	The key to the Proposed Scoring System is shown at Table NTS 2 and 4.5. This indicates that the score given to Landscape is largely "... " which means Significant Negative Effect, not Neutral.
SA	13			Natural England		Table NTS.5 Recommendations from the SA We welcome the inclusion of recommendations at this early stage. We support the recommendations on net gain and green infrastructure. However, the recommendation on GI is poorly worded as it implies that it is a landscaping tool.	Comments noted regarding the GI recommendation. This will evolve as the plan progresses with clearer policy directions and hence recommendations can be more specific.

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SA	43	Mark	Sitch	Barton Willmore	The Church Commissioners for England	SA complies (mostly) with the SEA Regulations and Section 19 of the PCPA (2004) that apply to this stage of plan making. No major deficiencies identified. The proposal for positive use of the Green Belt is supported, as is the recommendation of mitigation measures for development sites to minimise negative and maximise positive effects. Have submitted a SA Review of the Consortium's site scores.	The SA is not able to fully comply with the SEA Regulations at this stage as the Plan making process is not yet complete.
SA	69	Latisha	Dhir	GVA	St Phillips	The SA demonstrates that Options 1-5 are more likely to deliver significant positive impacts to the District compared with Options 6-9. Whilst the Council are right to consider the impacts of future growth on the environmental and landscape characteristics of the District, there are no severe or adverse impacts predicted from the development options that would prevent any from being adopted going forward.	It is unclear from looking at Table 5.2 in the SA how the view that Broad Options 1-5 deliver more significant positive impacts than Options 6-9, has been arrived at. It is too early in the process to determine conclusively that there are no severe or adverse impacts predicted from the development options presented.
SA	117	Darren	Oakley	RPS Group	Messrs Wild, Johnson, McIntyre & Fisher	Remind the Council that it is no longer required to identify the most appropriate strategy , rather it needs to adopt an appropriate strategy. No fundamental objections to the distribution options identified for appraisal. Represent an appropriate range of options for distribution of development given the context and issues facing Bromsgrove. Suggest that Option 5 is amended to reflect the positive effect that it would have on measures to address acknowledged unmet needs of the wider area. It is noted that further refinement of the distribution options appraisal will be progressed through later stages of the SA process. Suggest that where requirements or standards are proposed that these will need to be justified on the basis of evidence in line with the test of soundness. Note that no appraisal work has been carried out against Strategic Issue 4 to address wider development needs at this stage. In terms of the four housing growth options proposed, there appears to be additional land to be allocated, rather than for options for an appropriate housing target. This must be inferred by adding the previously allocated provision of 2,500 back onto each option. Only option 4 represents something like a housing requirement, unfortunately it doesn't propose a specific figure at this time. Do not consider that the Council has identified any reasonable alternatives for housing growth. In terms of housing density policies the SA appears to cover reasonable alternatives and recognises that density standards need to be balanced with other factors. Note no options are presented for affordable housing thresholds Broadly supportive of the binary approach to the consideration of housing mix. SA options cover the broad issues relating to planning for growth and change in the local economy. Currently a gap in the evidence base with respect to future jobs growth and changes in jobs forecast.	Comments about 'the most appropriate strategy' vs 'an appropriate strategy' are noted (with reference to revised NPPF para 35b). Comments also noted about SI4, Option 5, although the broad options presented here are about the distribution of development, rather than the overall quantum of development. Therefore reference to the conurbation does not mean that a higher level of housing will be delivered. Comments noted regarding the lack of reasonable alternatives for housing growth. This is because the housing need figures are taken from the standard methodology, and until further evidence is available to merit moving away from this figure, there is no justification to support a higher (or lower) figure. The comments made with respect to the SA and the housing options on density, affordable housing and dwelling mix are noted. The SA will have more meaningful results and recommendations as the plan develops and policy options are drafted. Gaps in the employment land evidence base will be filled prior to Preferred Options.
SA	119	Darren	Oakley	RPS Group	Gleeson	RPS would remind the Council that it is no longer required to identify the most appropriate strategy, rather it needs to adopt an appropriate strategy, in accordance with the revised NPPF test of soundness (para 35b).	Comments about 'the most appropriate strategy' (p.16 of the SA report) vs 'an appropriate strategy' are noted (with reference to revised NPPF para 35b).

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Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
SA	119	Darren	Oakley	RPS Group	Gleeson	<p>Strategic Issue 3: Broad Options for Development Distribution and allocating land uses</p> <p>At this stage, the SA focuses on the nine broad options for development distribution (summarised in Table NTS.4 of the SA report). It is noted (at p16) that the appraisal recognises that a combination of options will likely be needed to deliver an appropriate strategy for the distribution of development.</p> <p>RPS do not have any fundamental objections to the distribution options identified for appraisal. They represent, broadly speaking, an appropriate range of options for the distribution of development given the context and issues facing Bromsgrove. It is noted that the options do include the appraisal of options for development on the edge of the West Midlands conurbation (option 5). RPS suggest that this option be amended to reflect the positive effect that this option would have on measures to address the acknowledged unmet needs of the wider area, for which Bromsgrove is able to assist.</p> <p>The distribution options appraisal concludes that all nine options are likely to have both negative and uncertain impacts in terms of environmental objectives and, conversely positive impacts in terms of social and economic objectives. This is not unsurprising given the development focus of the plan objectives being appraised and the nature of the SA objectives. It is noted that further refinement of the distribution options appraisal will be progressed through later stages of the SA process.</p> <p>The SA report goes on to make a number of recommendations for the next stages of plan making and policy development informed by the appraisal. This is summarised in Table NTS.5 (p19). Whilst most of the recommendations seek to encourage or promote a particular policy in response to issues identified through the SA, a number of recommendations require or adopt certain actions or measures through the application of policy. RPS would suggest that where requirements or standards are proposed that these will need to be justified on the basis of evidence in line with the test of soundness.</p>	Comments noted about SI4, Option 5, although the broad options presented here are about the distribution of development, rather than the overall quantum of development. Therefore reference to locating development on the edge of the conurbation does not mean that a higher level of housing will be delivered. All of the distribution options presented at this stage would have the same effect on the unmet need of the wider area. Comments noted regarding the SA recommendations in the SA at Table NTS 5 and the need for evidence to support these recommendations. However, some of these recommendations follow best practice or government guidance, so evidence may not always be necessary.
SA	119	Darren	Oakley	RPS Group	Gleeson	<p>Strategic Issue 4: Co-operating with the West Midlands Conurbation to address wider development need</p> <p>RPS also note that no appraisal work has been carried out against Strategic Issue 4: Co-operating with the West Midlands Conurbation to address wider development need at this stage.</p>	-
SA	119	Darren	Oakley	RPS Group	Gleeson	<p>Strategic Issue 5: Re-balancing the Housing Market through Housing Growth</p> <p>In terms of the four housing growth options proposed, these appear additional land to be allocated, rather than options for an appropriate housing requirement or target. This must be inferred by adding the previously allocated provision of 2,500 back onto each option. Options 1 to 3 appear to be derived directly from the standard method calculation with no upward adjustment of any kind. Only Option 4 represents something like a housing requirement, because it refers to the identification of additional land above the standard method figure. Unfortunately, Option 4 does not propose a specific figure at this time.</p> <p>RPS suggest that none of the options appear to represent a housing target or requirement covering the plan period. It is therefore difficult at this time to provide any meaningful response until the Council issues overall housing growth options, which properly factor in adjustments to assisting in addressing affordable housing need and economic growth aspirations. Without a clear housing requirement, it will be very difficult to monitor delivery performance or five year supply against an up to date requirement. In relation to what an appropriate housing requirement should be for Bromsgrove over the plan period, this needs to recognise that the standard method figure represents a minimum, rather than a target.</p> <p>Consequently, RPS do not consider that the Council has identified any reasonable alternatives for housing growth as part of this local plan review. Furthermore, any housing growth options should also differentiate between the local housing needs of Bromsgrove and the unmet housing needs of the West Midlands conurbation, so it can be made clear which site allocations contribute towards which need.</p>	Comments noted regarding the lack of reasonable alternatives for housing growth. This is because the housing need figures are taken from the standard methodology and then applied to a different plan period to generate different levels of requirement. Until further evidence is available to merit moving away from this figure, there is no justification to support a higher (or lower) figure.



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SA	119	Darren	Oakley	RPS Group	Gleeson	<p>Housing Options</p> <p>The range of housing topics and options appraised here would appear to cover the relevant topics. In terms of housing density policies (discussed at para 5.5.3-5.5.4 of the report) the SA appears to cover reasonable alternatives, and recognises that density standards or policies need to be balanced with other factors, including the characteristics of the locality in question.</p> <p>It is noted that no options are presented for affordable housing thresholds or standards at this stage. Consequently, RPS reserve the right to provide comments on this at a later stage once options are issued for public consultation.</p> <p>In terms of housing mix, is broadly supportive of the binary approach to the consideration of the appropriateness, or otherwise, of establishing requirement for a certain mix of dwellings depending on location.</p>	The comments made with respect to the SA and the housing options on density, affordable housing and dwelling mix are noted. The SA will have more meaningful results and recommendations as the plan develops and policy options are drafted.
SA	119	Darren	Oakley	RPS Group	Gleeson	<p>Employment Growth Options</p> <p>The options considered in the SA cover the broad issues relating to planning for growth and change in the local economy. However, there is currently a gap in the evidence base with respect to future jobs growth and changes in job forecast over the plan period. RPS therefore reserve the right to provide comments on this at a later stage once the evidence base is issued for public consultation.</p>	Comments noted. Gaps in the employment land evidence base will be filled prior to Preferred Options.
SA	136	Kathryn	Young	Turley	Land Fund	<p>Section 3 of the SA Report introduces the baseline characteristics of Bromsgrove District based upon the SA/ SEA criteria and the key sustainability issues facing the district. Land Fund have reviewed this section of the SA and note the following:</p> <ul style="list-style-type: none"> <li>• The need to improve Air Quality in the District although there are some signs of improvement given that the Air Quality Management Area (AQMA) within Hagley is under review with the potential to revoke the AQMA as a result of improving air quality.</li> <li>• With regards to climate change mitigation and the need to reduce Greenhouse gas (GHG) emissions, Land Fund suggest that an additional 'key sustainability issue' would be to locate new development in the most sustainable locations to provide residents with the opportunities for sustainable modes of transportation other than private car.</li> <li>• Section 3.6 of The SA Report introduces the baseline data associated with Landscape, Townscape and the Historic Environment. Arising from this data is the identification of the following key sustainability issue: <ul style="list-style-type: none"> <li>– The need to protect and enhance the Green Belt and the openness of the Green Belt;</li> </ul> </li> <li>• Land Fund are fully supportive of the need to protect the Green Belt however suggest that the focus should be on protecting the best performing Green Belt as it is accepted that some Green Belt release is needed to meet the housing shortfall and therefore efforts should be focused on protecting and enhancing the best performing Green Belt land.</li> <li>• Paragraph 3.9.8 of the SA Report identifies the scale of 'out-commuting' from the District, principally to areas such as Birmingham, Solihull, Redditch and Dudley. Section 3.10 (Transport and Accessibility) also identifies that a high percentage of commuters still favour the private car which is significantly above the national average. Given the need for additional housing to meet the need arising from the GBHMA, a significant percentage of residents are likely to 'out-commute' and therefore Land Fund suggest that an additional key sustainability issue under the Transport and Accessibility baseline section should be: <ul style="list-style-type: none"> <li>– The need to locate development in sustainable locations which provide the opportunity for sustainable modes of transportation.</li> </ul> </li> </ul>	With regard to the Key Sustainability Issues for Air Quality, Waste, Pollution and Energy, Flood Risk and Climate Change on page 60 of the SA, the addition of 'the need to locate new development in the most sustainable locations to provide residents with opportunities for sustainable modes of transportation other than private car' will be considered through the next iteration of the SA. With regard to the Key Sustainability Issues for Landscape, Townscape and the Historic Environment on page 70 of the SA, it is agreed that the key issue with regard to protecting the Green Belt should be amended in future iterations of the SA. There is merit in the suggested addition to the Key Sustainability Issues (KSI) under Transport and Accessibility on page 96 but this is already adequately covered in the KSIs "The need to address the location of key public transport nodes, e.g. Bromsgrove train station, and where development is located in relation to sustainable transport options" and "The need to encourage more walking and cycling, provision of safe and interconnected routes"

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SA	136	Kathryn	Young	Turley	Land Fund	<p>Site Appraisal Methodology</p> <p>Paragraphs 4.3.11 -4.3.14 and Table 4.7 presents an explanation and criteria proposed for the site appraisal process at the next SA Stage. This process is crucial to identifying the most sustainable sites for selection and include a number of criteria for identifying their sustainability to which Land Fund would like to make the following key comment.</p> <p>Land Fund note that for SA Objectives 9, 12, 14 and 15, distances have been used to provide scoring for the performance against that specific SA Objective. As an example SA Objective 14 (Access to Educational facilities) suggests that a site that is between 800m -2000m of primary/ first should only receive a neutral impact with regards to its sustainability performance with no direct reference to the source of the distances and whether these constitute recommended guidance.</p> <p>Land Fund believe it appropriate to remind The Council of the Guidance issued by the Institute of Highways and Transportation presents a number of recommendations with regards to distances for walking and cycling to key services which have generally been considered acceptable and utilised by local plans. In this regard it is noted that Table 3.2 of the document suggests that a distance of up to 2,000m is considered acceptable for walking to school and therefore this should be recognised with a positive sustainability score. Furthermore the appraisal matrix does not differentiate distances for walking or cycling. Land Fund believe that cycling offers the potential for sustainable travel at distances greater than 2,000m and therefore this should be recognised by the appraisal criteria by providing the opportunity for positive sustainability scoring for sites that can access key services and facilities via walking and cycling.</p> <p>Although distances to key services and facilities are a useful guide to identifying the most sustainable locations for new housing, Land Fund also believe that a wide range of factors (other than distances) should also play a significant role in the evidence base to support an allocation. This may include an agreed transportation strategy, access to green space and/ or any mitigation measures proposed as part of the design process to improve a sites sustainability performance.</p>	Comments noted with regard to acceptable walking distances and reference to the document from the Institution of Highways and Transportation, although we note this was published in 2000 so would wish to verify that the guidance has not been superseded by something more up to date. We will consider adding a source to the acceptable distances quoted in Table 4.7. Whilst it is acknowledged that journeys by bike may exceed the maximum 2000m used in Table 4.7, NOMIS data referred to on page 95 of the SA reports that whilst 8% of Bromsgrove's employed residents commute to work on foot or by bicycle, but that this is predominantly made up of those who walk rather than cycle. Therefore it is advisable to keep the maximum distance at 2000m to recognise the predominance of walking. It is noted that other factors contribute to identifying the most sustainable locations for new housing, and such factors will be picked up in the Council's own screening of sites prior to SA.
SA	136	Kathryn	Young	Turley	Land Fund	<p>Assessing the Strategic Policy Options</p> <p>Section 4 of the SA, presents the methodology used within the SA assessment to test the policy options. Section 5.4 then presents the results of the assessment of the following key strategic options:</p> <p>1: Scale and timeframe of the new Plan;</p> <p>2: Growing the economy and provision of strategic infrastructure;</p> <p>3: Broad Options for Development Distribution and allocating land uses;</p> <p>4: Co-operating with the West Midlands Conurbation to address wider development needs; and</p> <p>5: Re-balancing the housing market.</p>	-

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SA	136	Kathryn	Young	Turley	Land Fund	<p>Strategic Issue 3: Broad Options for Development Distribution and allocating land uses</p> <p>Paragraph 5.4.6 of The SA Report presents the 9 different policy options (reasonable alternatives) for the distribution of housing within the District with the results of the assessment summarised in Paragraphs 5.4.7 – 5.4.32 and Appendix D of The SA Report.</p> <p>Of the nine distribution options proposed Land Fund consider that Options 2 and 3 (presented below) present strong potential for sustainability benefits:</p> <p>Option 2: Focus development on transport corridors and/or locations with good transport links - this could focus on good accessibility to the primary road network, rail and other sustainable modes of transport in a bid to ease road traffic congestion within the District.</p> <p>Option 3: Focus development on the Large Settlements, as identified in the existing BDP - this could take the form of infilling and urban extensions to the settlements but likely to be on a smaller scale than Option 1 of the document. The amount of development which could be attributed to the settlements would need to take account of current settlement size, existing facilities and whether there is an opportunity to increase services and facilities, meaning that the levels of distribution may not be the same for all settlements.</p> <p>With regards to option 2, Land Fund have reviewed the settlement hierarchy within Policy BDP 2 and its associated evidence base (Settlement Hierarchy Background Paper, Bromsgrove District Council, September 2012) published in 2012 and note that of the large settlements, Hagley is the highest scoring (66) and therefore classed as the most sustainable with Wythall (57) the second most sustainable.</p> <p>Hagley benefits from a wide range of facilities and services including a primary school, two secondary schools and a train service which provides a direct link to Birmingham and the wider West Midlands conurbation. Indeed, Land Fund are aware that since the publication of the Settlement Hierarchy (Settlement Hierarchy Background Paper, Bromsgrove District Council, September 2012) the frequency of rail services have improved with a half hourly service to Dorridge and Kidderminster thereby providing further options for residents to commute to Birmingham and the wider GBHMA via sustainable modes of transportation. Focusing development within Hagley therefore has the potential to provide sustainability benefits not only to the District of Bromsgrove but also the wider GB HMA.</p>	Comments noted. The BDP settlement hierarchy and evidence underpinning it will be reviewed as part of the preparation of the plan review so the 2012 paper should not be relied upon too heavily at this stage.
SA	136	Kathryn	Young	Turley	Land Fund	<p>With regards to the assessment of the distribution options within the SA, Land Fund would like to make the following comments:</p> <ul style="list-style-type: none"> <li>• With regards to SA Objective 1 (Water, Soil and Air Quality) and SA Objective 5 (Climate Change), Land Fund believe that Options 2 and 3 should be recognised as having the potential for significant positive benefits to Air Quality and Climate Change (as a result of reduced GHG emissions from private car) within the District as it would locate housing in the most sustainable locations and with access to sustainable modes of transportation.</li> <li>• With regards to SA Objective 12 (Town Centre Vitality and Community Facilities and Services), Land Fund note that the SA commentary within paragraph 5.4.26 suggests that those options that support existing services and facilities (such as Option 3) would perform more strongly however the SA scoring for each Option would appear to be identical. Land Fund would therefore suggest that the SA Scoring for Option 2 against SA Objective 12 should be increased to a significant positive.</li> <li>• Land Fund disagree with the conclusions reached for Options 2 and 3 with respect to SA Objective 15 (Travel). Locating new development in the most sustainable locations such as the large settlements or in locations where there are strong transport corridors and/ or public transport should receive a higher scoring when compared to the remaining options given that both options should provide residents with greater opportunities for more sustainable modes of transportation other than the private car. Indeed given that some of the large settlements such as Hagley have a rail services (now significantly improved) and so there is the potential for a greater sustainability benefit through the combination of both Option 2 and Option 3 for SA Objective 15 (Travel).</li> </ul>	Whilst the detailed comments with regard to Table 5.2 of the SA are noted, the next iteration of the SA will see these options refined, with fewer development options presented but more detailed proposals available. The broad options appraised for the purpose of the Issues and Options SA were very high level and thus it was felt that many of the options would have a similar impact on the SA objectives. Should Broad Options 2 and 3 be progressed, the comments made about their SA will be reconsidered in the context of the appraisal of the Preferred Options document.
SA	136	Kathryn	Young	Turley	Land Fund	In relation to paragraph 5.4.30 of the SA Report, Land Fund fully support the recognition that the preferred option for housing distribution could be a hybrid of one or more of the nine options tested within the SA.	Support noted.

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SA	136	Kathryn	Young	Turley	Land Fund	<p>Land Fund do disagree however with the SA's conclusion that it is premature to identify the better performing options on SA terms. Given Land Funds representations, the baseline date presented and the clarity of options tested, Land Fund believe that Options 2 and 3 are the most sustainable options for a number of reasons which include:</p> <ul style="list-style-type: none"> <li>• Both options will meet the housing requirements and therefore a fundamental objective of the plan</li> <li>• New housing will be located in the most sustainable locations and/ or close to public transport corridors thereby tackling key issues such as out commuting, use of private car, air quality and climate change.</li> <li>• The economic and social benefits of new housing are spread throughout the district.</li> <li>• There is also the opportunity for increased sustainability benefits by combining the two options on the basis that several of the more sustainable settlements identified in Policy BDP2 (such as Hagley) have strong public transport nodes such as bus and train stations.</li> <li>• Paragraph 5.4.31 lists the conclusion of the SA assessment of the distribution options. The last two bullet points of this paragraph appear to be identifying benefits from Options 2 and 3 through the location of new housing close to existing services and facilities and public transport nodes.</li> </ul>	The comments with regard to the SA conclusions for Options 2 and 3 are noted, however at this stage it is felt that there is not enough detail in the options to identify which options were best performing and to truly differentiate between them.
SA	136	Kathryn	Young	Turley	Land Fund	<p>Green Belt</p> <p>Section 5.13 of the SA Report discusses the issue of Green Belt and its assessment within the SA. Land Fund fully agree that Green belt is not a sustainability issue but rather a policy designation and therefore the SA should focus on identifying the most sustainable sites for development regardless of Green Belt designation.</p>	Agreement noted.
SA	136	Kathryn	Young	Turley	Land Fund	<p>Summary of SA representations: The baseline date and key sustainability issues emphasise the need to provide new housing in sustainable locations that provide residents with the opportunity to utilise sustainable modes of transportation as an alternative to the private car to access Bromsgrove District and the wider GB HMA.</p> <p>Option 3 is supported on the basis that the distribution of new homes in accordance with the settlement hierarchy is likely to have inherent sustainability benefits, particularly given that settlements such as Hagley are now able to offer greater options for sustainable transportation.</p> <p>Option 2 is supported on the basis that locating new development where it can access sustainable modes of transportation will address some of the key sustainability challenges for Bromsgrove District.</p> <p>Distribution Options 2 and 3 have strong sustainability benefits although these could be significantly enhanced should these options be 'blended' into the preferred development option of locating new housing in the most sustainable settlements with access to sustainable modes of transportation.</p> <p>Hagley is fully justified as a large settlement within Policy BDP 2 and given the wide range of services and facilities present within the settlement and its options with regards to sustainable transportation, should receive a significant proportion of new housing.</p>	Noted.
SA	139	Glenda	Parkes	Tyler Parkes	Oakland Developments	<p>Our Client welcomes the acknowledgement of the importance of utilising previously developed land in the Sustainability Appraisal (SA) and the specific reference on page 40 to the role of brownfield sites in delivering housing. Our Client is keen to point out that their site has not been submitted to the Council for consideration as part of the Brownfield Sites Register and therefore the potential for housing on this site is not included in the figure quoted on page 41. This figure suggests that there is only potential for 468 dwellings on previously developed land within the District, however, once our Client's site is included in the appraisal, this figure will be substantially increased. Therefore, our Client seeks assurance that the future review of the Sustainability Appraisal will include an updated figure to reflect consideration of our clients site.</p> <p>Our Client welcomes the recommendation at table 5.3 that the LPA should include policies to help optimise the reuse of previously developed land buildings which is in line with national planning policy objectives.</p>	It is premature to consider the potential addition of possible sites to the Brownfield Land Register. Para 3.3.1 of the SA was accurate at the time of drafting in summer 2018. Future iterations of the SA will report on up to date figures from the Brownfield Land Register. However, the Council was not seeking potential development sites at this stage and as such, the site at Oakland International would not be considered until after a comprehensive Call for Sites exercise has taken place. Notwithstanding the above, it should also be noted that the vast majority of the site submitted in this representation is not brownfield land and therefore would not be suitable for the Brownfield Land Register.
SA	176	Mr & Mrs J D	Winslow			<p>It is clear that Bromsgrove's SA consultants have misunderstood or have been misinformed about the nature of the "traveller" site in Sheltwood Lane, Tardebigge (SA, para. 5.5.24) and, consequently, their comments may well have misled readers. Lying in the heart of agricultural land and accessed only by single track lanes, the site is home to one particular family who were given permission to stay there only because of health problems. The planning records should clarify this and we would expect the SA to be amended to reflect the true situation.</p>	Para 5.5.24 is correct. A traveller site does exist at Sheltwood Lane, Tardebigge which is home to one extended family, with planning permission limiting the site to no more than 3 caravans (of which no more than 1 shall be a static caravan or mobile home). The precise number of pitches at the Sheltwood Lane site can be added to future revisions of the SA. should this be relevant.

Representation	Received	Not Received	Total
Representations received that are Miscellaneous/Other			

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Other	1	Tammy	Williams	Alvechurch Parish Council		Paragraph 4.13 The M42 is an economic advantage which could be better used to attract high value industrial firms. This paragraph is being overly prescriptive and could lead to extra pressure being put on the A441 and A435 at junctions 2 and 3 of the M42. Surely junction 1 (M42) and Junction 4 (M5) could be mentioned in a similar vein. Over focussing on the M42 and economic growth potential will lead to inevitable consequences on other roads and services	Comments noted. However evidence from Highways England and Worcestershire County Council substantiates that statement in this paragraph that these Junctions 2 and 3 on the M42 are the least constrained access point to the Strategic Road Network in the District.
Other	1	Tammy	Williams	Alvechurch Parish Council		Strategic Issue 3: A. Paragraph 4.20. It seems page numbers quoted are wrong “ (please refer to Q.S14, page 19)”, this should be Issues and Options document page 25 (number at bottom of page)	Typographical Error Noted.
Other	1	Tammy	Williams	Alvechurch Parish Council		The content of Paragraphs 6. 6 and 6.7 would if repositioned earlier in the paper helpfully inform the strategic issue number 4 discussion on broad options for development distribution. This is to register further that consideration of development distribution and associated land use are about both business and housing needs Examination of the options here prompted by a focus on land for business might lead to a different selection of options to that where housing location is the basis for choices.	Comments about the structure of the document are noted. It is unlikely that future Plan Review documents will follow the same format as they will include draft policies so will appear more similar to the current BDP.
Other	1	Tammy	Williams	Alvechurch Parish Council		The section on employment would have been better located as a chapter prior to the section on distribution of development and land use. Then the short but significant paragraph 6.7 would have made greater impact. (A similar case can be made for the housing section also to be moved)	Comments about the structure of the document are noted. It is unlikely that future Plan Review documents will follow the same format as they will include draft policies so will appear more similar to the current BDP.
Other	11	Rosamund	Worrall	Historic England		I&O Para 1.19 - The Scoping report identified key sustainability issues which relate to the consideration of future site allocations. The historic environment, heritage assets and setting are not included here and it is recommended that it will need to be considered in order for the Plan to demonstrate a positive approach to the historic environment in accordance with NPPF requirements. Any harm to heritage assets or setting as a result of a potential site allocation could bring into question the deliverability of that site.	Comments noted. The Council recognise that heritage assets and their setting will be important considerations when looking at selecting sites for allocation. Heritage assets and conservation areas feature on the List of Identified Considerations which will be used to assess those sites submitted to us through the Call for Sites process.
Other	13			Natural England		We note that the LPA has not yet undertaken a Habitat Regulations Assessment (HRA). We recommend doing so at the earliest possible stage, so that the HRA can inform the Local Plan as it develops. This might allow potential impacts to be avoided. The LPA should be aware of a recent ruling by the Court of Justice of the European Union People Over Wind and Sweetman vs Coillte Teoranta (ref: C-323/17). The CJEU’s judgment states that “measures intended to avoid or reduce ... harmful effects” (generally referred to as ‘mitigation measures’) cannot be taken into account when deciding whether a plan or project is likely to have a significant effect on a European site. Rather, a competent authority must take account of measures intended to avoid or reduce the harmful effects of a plan or project as part of the appropriate assessment. Only then can a conclusion be drawn as to whether the plan or project will have an adverse effect on the integrity of the site.	Comments noted. We will commence the HRA process by undertaking Screening of the plan as soon as resources allow. Natural England will of course be a consultee for this Screening.
Other	15	Fiona	McIntosh	North Worcestershire Water Management		Evidence base - The SFRA should be revised as part of the Local Plan Review. There have been at least 2 locally significant flood events since it was published in 2012. A great deal of local knowledge has been gained since the formation of NWWM in 2012, which is not necessarily included in the existing plans.	Comments noted. It is envisaged that an updated SFRA will be needed to inform the plan and to consider potential allocation sites in greater detail.
Other	28	Emily	Barker	Worcestershire County Council		Should include a reference to the Waste Core Strategy and Minerals Local Plan forming part of the development plan , would help developers and decision makers understand the relationship.	Noted. This would add useful strategic context to the plan.
Other	28	Emily	Barker	Worcestershire County Council		Highlight the need to use the Joint Strategic Needs Assessment of Health & Wellbeing as part of the evidence base. This contains summary reports, thematic assessments and profiles and a data mapping tool.	Noted. The JSNA will form an important part of the evidence base and will also be useful to inform the Infrastructure Delivery Plan.
Other	31	Rachel	Jones	Better Environment Theme Group		As part of plan review, need to look at infrastructure levy other LA's in the district have utilised this at a parish level to help support community buildings and their improvement.	Comments noted. A Community Infrastructure Levy (CIL) can be introduced through the plan-making system, and a proportion of the funds gathered through this is devolved to parish level. To date, Bromsgrove District Council has decided that Section 106 Agreements are more appropriate than CIL in gathering contributions from development for infrastructure. We will review the Council's position on this whilst reviewing the Plan.
Other	31	Rachel	Jones	Better Environment Theme Group		Does the council building it's own homes fit into the planned housing numbers?	Yes, should the Council begin building homes itself, these would count towards the housing supply.

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Other	61	Jeremy	Robinson	Draycott Developments		<p>Stourbridge Road Catshill (BDC 96):</p> <p>This site scored well when assessed within the SHLAA of 2014.</p> <p>The Issue and Options consultation document outlines draft selection methodology which again this site scores well:-</p> <p>Flood risk.</p> <p>Historic or Environmental designations.</p> <p>Sustainability - distance to local facilities and public transport links.</p> <p>Highways - ability to access existing highway network/serve new growth.</p> <p>Deliverability - whether there is a reasonable prospect the site could come forward for development in the desired timeframe, considering availability and achievability.</p> <p>Further the site is surrounded by existing housing and the M5, ensuring that it could not evolve into urban spread.</p> <p>In view of the foregoing we believe this site should qualify as a preferred option site when sites are considered</p>	We are not considering any potential development sites that have been submitted to us at this stage. A Call for Sites exercise will be launched in autumn 2019 and we would advise you to complete the relevant form and formally submit your site to us at this stage.
Other	70	Susan	Forrest			This is a long and complicated document to comment on.	Comments noted. Officers worked hard to make this document as accessible as possible and planned an extensive consultation period with a variety of events to meet as wide an audience as possible and we are disappointed to hear you found it complicated to comment on.
Other	81	Scott	Wright			<p>I am discussed that I've only just found out that you are proposing to build a housing estate at the bottom of my garden on the night the consultation closes. Surely with a proposal of this magnitude you should be contacting the people it directly effects personally !!</p> <p>You surely quick enough to co tact me when I forgot to pay for my garden waste bin. We are 100% oppose to building on any green belt land when there are so main brown field sites available. Why is Bromsgrove council so in favour of destroying village communities?</p>	Unfortunately it is not clear which 'housing estate' is being referred to, as the address provided is not complete. However, we would emphasise that no housing sites are proposed in this consultation document. If reference is being made to a planning application, you should have been notified about that if your property is directly adjacent to the site in question, or if not, a site notice would have been displayed on the boundary of the site. The Council's evidence demonstrates that there is not enough brownfield land in the District to deliver the number of homes needed for current and future generations. Brownfield sites may come forward unexpectedly during the plan period, and where appropriate, these can come forward for housing, thus reducing the need for Green Belt land.
Other	85	Peter	Grinell	Hartnells Estates	Bishop Properties Ltd, Paul Wild & Charter Interiors Ltd	Representation to propose a site for development. Land to the south-west of Callow Hill Road, Alvechurch.	We are not considering any potential development sites that have been submitted to us at this stage. A Call for Sites exercise will be launched in autumn 2019 and we would advise you to complete the relevant form and formally submit your site to us at this stage.
Other	101	Richard	Peach			<p>I have tried to study the various documents presented as part of your "Issues &amp; Options" consultation and, even after going to two presentations on the matter - and having read the "Hearn/Wood report" closely - feel this process is opaque, at best.</p> <p>There is too much planning language for the ordinary person to understand and follow, which means this consultation can not meet its aim of knowing what we, the council taxpayers of Bromsgrove district, actually expect from the council officers whom we pay to look after our interests.</p> <p>Even after personally following planning issues in Bromsgrove for more than two decades (as a journalist writing about them) I have struggled to find a straightforward way to approach, understand or respond to this consultation.</p> <p>I appreciate that the complexity and range of such a consultation perhaps necessitates this approach to some extent; but on the other hand I believe a simpler, more accessible methodology would have produced results that were valid and a process with which more people would have felt able to contribute.</p>	Comments noted. Officers worked hard to make this document as accessible as possible and planned an extensive consultation period with a variety of events to meet as wide an audience as possible and we are disappointed to hear you found it complicated to comment on. Unfortunately we have a wide variety of interested parties (ranging from the public, to statutory bodies, to planning agents and developers), and it is difficult to address the needs of all parties by producing a document which suits all interests. Alongside this, many planning terms are included in the National Planning Policy Framework and associated Planning Practice Guidance and these must be referred to to demonstrate how we intend to adhere to national policy.
Other	116	Rosemary	Reynolds			Rep relating to land adjoining No.25 and the rear of No.25-45 St.Godwalds Road, Aston Fields-It would be our joint wish that this land be released from the GB	We are not considering any potential development sites that have been submitted to us at this stage. A Call for Sites exercise will be launched in autumn 2019 and we would advise you to complete the relevant form and formally submit your site to us at this stage.

Bromsgrove District Plan Review  
Issues and Options Representations and Officer Responses

Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
Other	121	Roy	Mee			Objection to housing development to the rear of Bittell Road, Barnt Green (see rep)	Following a search of the Council's system, no planning application for land to the rear of 87 Bittell Road, Barnt Green was found. Should an application be submitted in the future on this site, we would advise you to raise any objection with the case officer, citing the application reference number.
Other	136	Kathryn	Young	Turley	Land Fund	<p>The LPR should be evidence based, including due consideration being given to the findings of the GL Hearn Study.</p> <p>The Council should work closely with neighbouring authorities to identify how the District can help meet the unmet housing needs arising from outside the District.</p> <p>The standard method should be considered as a starting point only and it should be recognised that this represents a minimum annual housing requirement only.</p> <p>The need to identify sufficient land to deliver approximately 2,300 dwellings (the shortfall arising from the BDP) should not be 'lost' in the standard method.</p> <p>The LPR should focus development in the most sustainable locations in accordance with the spatial strategy established in the BDP i.e. the main town and larger settlements such as Hagley.</p> <p>It should be recognised that Hagley benefits from a wider range of services and facilities including a primary school and two secondary schools. Furthermore Hagley train station provides direct and sustainable public transport linkages to Birmingham and the wider West Midlands conurbation where there is a significant shortfall in meeting identified housing requirements.</p> <p>Sites should be removed from the Green Belt and allocated for residential development which preserve the attractiveness of the environment, reduce the need to travel and promotes sustainable communities based on the services and facilities.</p> <p>Policies relating to housing mix and tenure type should be applied flexibly and should be considered on a site by site basis.</p>	<p>Comments noted. Further evidence will be gathered prior to the Preferred Options stage to underpin policies and ensure they are justified. The Council will continue discussions under the Duty to Cooperate to assist in meeting the shortfall from neighbouring authorities, where possible. The Council recognise that the standard methodology is the starting point to determining a housing requirement. With regard to any shortfall from the BDP, we would highlight the following advice in the Planning Practice Guidance: <i>"Can strategic policy-making authorities take account of past under delivery of new homes in preparing plans? The affordability adjustment is applied to take account of past under-delivery. The standard method identifies the minimum uplift that will be required and therefore it is not a requirement to specifically address under-delivery separately. Where an alternative approach to the standard method is used, past under delivery should be taken into account."</i> (Paragraph: 011 Reference ID: 2a-011-20190220). The spatial strategy will emerge as the plan review progresses, but will not necessarily follow that already set out in the BDP. The Green Belt Purposes Assessment, along with Site Selection work, will determine which are the best sites to be removed from the Green Belt for development. Housing mix and tenure type policies will be informed by up to date evidence.</p>
Other	141	Alexis	Devereaux			Site BDC96 is ideal for development and should be removed from the Green Belt	We are not considering any potential development sites that have been submitted to us at this stage. A Call for Sites exercise will be launched in autumn 2019 and we would advise you to complete the relevant form and formally submit your site to us at this stage.
Other	145	C	Birrell			I am disgraced that it seems like there is no care for Bromsgrove's green belt.	Unfortunately, it has been established that Green Belt land will be needed in the short term to find land for the remainder of dwellings needed to 2030 under the BDP. Beyond this, given the nature of the land in the District (approx. 90% Green Belt, urban areas built to their limits), further Green Belt land will be needed to meet longer term development needs. A detailed Green Belt Purposes Assessment is being undertaken to consider the strength of the existing Green Belt and how it performs against the established criteria in national policy.
Other	146	Charlotte	Quirck			Would like to raise the issue of litter.	Litter is not a planning matter.

Bromsgrove District Plan Review  
Issues and Options Representations and Officer Responses

Question ID	URN	First Name	Last Name	Company/Organisation	On behalf of	Representation	Officer Response
Other	150	David	Barry			<p>Please can you consider the following comments during the consultation process for Bromsgrove's District Plan?</p> <p>I feel that too much focus is given to developing open green belt land for commercial housing development, without any formal consideration given to existing brown field sites and unused commercial property.</p> <p>All major towns and cities, Birmingham Jewellery Quarter is just one example, have invested effort into converting existing property into new commercial, but mainly residential, property.</p> <p>My belief is that there should be, as part of the BSP, a working party set up to focus solely on this aspect of development. If Bromsgrove just looks at building on virgin green belt land our future will be cluttered with cheap housing, which will not last beyond one generation, as well as millions of square feet of empty commercial 'sheds', which will be built with no alternative use designed into them.</p> <p>Please listen as ruining our country side is not the answer to the 'housing problem'.</p>	Unfortunately, it has been established that Green Belt land will be needed in the short term to find land for the remainder of dwellings needed to 2030 under the BDP. Beyond this, given the nature of the land in the District (approx. 90% Green Belt, urban areas built to their limits), further Green Belt land will be needed to meet longer term development needs. The Council will set out the detailed exceptional circumstances which we feel exist as a full justification for why we are considering land within the Green Belt for development, in line with para 137 of the National Planning Policy Framework. This will set out the amount of brownfield land and underutilised sites there are in the District, whether densities on existing development sites have been optimised and what discussions have taken place with neighbouring authorities about their ability to accommodate some of the District's identified need within their area. The District does not have an abundance of this type of land, unlike areas in the Birmingham conurbation such as the Jewellery Quarter mentioned in the comments. A Strategic Planning Steering Group of Councillors from across all parties has been set up alongside the Bromsgrove District Plan Review to guide and scrutinise the work of planning officers.
Other	151	Dawn	Macqueen			The quality of the maps is very poor and make it difficult to identify locations adequately.	Comments noted. The online versions of the documents have higher resolution images in them. Should you struggle to view our documentation in future, please do not hesitate to contact us and we will be able to direct you to better quality versions.
Other	172	Martin	Birrell			<p>I would like to object any building on green belt, look at my area ever since the new estate in Cofton was built the crime has gone through the roof, also the pollution will increase dramatically. You will destroy the history of this district, we are known for our green land and this will just be taken away. The migratory species that use this area every year will have no where to go, do you even care about the animals??</p> <p>I am also writing this for my mum who really cares about this area, she lives in Majors Green which is under threat, I think its disgusting how area can just be ripped up with no care</p>	No land at Cofton has been removed from the Green Belt in recent years. Land at the Former East Works site off Groveley Lane was previously part of the MG Rover works at Longbridge. The first part of a Green Belt Purposes Assessment has been carried out which considers how the District's Green Belt land performs against the established criteria for Green Belt in national policy. As sites are promoted for development, the consider will scrutinise their suitability for development against a range of considerations including biodiversity, landscape value and flood risk.
Other	173	Mary	Rowlands			<p>The 'methodology' used to produce these documents is not 'user friendly'.</p> <p>To not just be a tick box exercise, future documents need to be suitable for the general public.</p>	Comments noted. Officers worked hard to make this document as accessible as possible and planned an extensive consultation period with a variety of events to meet as wide an audience as possible.
Other	178	M B	Grinnell			Concerned for the North Worcestershire countryside. This area is enjoyed not only by residents but also many from the neighbouring conurbation who need a green open space close to home. Would like to think the scenic and leisure value of an area would be taken into account.	Unfortunately, it has been established that Green Belt land will be needed in the short term to find land for the remainder of dwellings needed to 2030 under the BDP. Beyond this, given the nature of the land in the District (approx. 90% Green Belt, urban areas built to their limits), further Green Belt land will be needed to meet longer term development needs. A detailed Green Belt Purposes Assessment is being undertaken to consider the strength of the remaining Green Belt and how it performs against the established criteria in national policy. Where opportunities exist to enhance the existing Green Belt and improve access for leisure pursuits, these will be investigated.
Other	187	Pete	Lewis			No development should be made on green belt or agricultural land, especially where still in use, e.g.. in the case of Perryfields/Whitford Vale.	Unfortunately, it has been established that Green Belt land will be needed in the short term to find land for the remainder of dwellings needed to 2030 under the BDP. Beyond this, given the nature of the land in the District (approx. 90% Green Belt, urban areas built to their limits), further Green Belt land will be needed to meet longer term development needs. A detailed Green Belt Purposes Assessment is being undertaken to consider the strength of the existing Green Belt and how it performs against the established criteria in national policy.
Other	192			Dodford with Grafton Parish Council		The need to conserve and enhance the District's landscape character.	Comments noted. It is proposed that a Landscape Character Assessment/Landscape Visual Impact Assessment will be produced prior to the Preferred Options stage.
Other	195	D R	Clarke			And the position regarding empty properties should be examined in all sectors including space over shops.	Comments noted. Where available, data on empty properties will be fed into the evidence base for the plan.



### Summary of Responses to Green Belt Purposes Assessment Methodology (Consultation Draft September 2018)

URN	First Name	Last Name	Organisation	Representation	Officer Response
<b>1a. Do you agree with a two part process for assessing Bromsgrove's Green Belt?</b>					
1	Tammy	Williams	Alvechurch Parish Council	Agree in principle.	Comment of support for two part process noted.
1	Tammy	Williams	Alvechurch Parish Council	Further consultation with Neighbourhood Planning groups which include their own local assessment of preferred community-identified sites and these should strongly influence sites being identified in the Preferred Options stage and Pre-Submission stage	Comment noted. BDC will continue to consult with neighbourhood planning groups and parish councils as the plan review progresses. This will include Part 2 of the Green Belt assessment which will be informed by the site selection process in identifying potential sites for inclusion in later stages of the plan review.
2	Gill	Lungley	Barnt Green Parish Council	Yes - agree with a two part assessment process.	Comment of support for two part process noted.
4	Barry	Spence	Bentley Pouncefoot Parish Council	1a & 2a. Don't agree with the two part process for assessing Bromsgrove's Green Belt - the strategic parcels are far too large, many with great variation in character.	Comment noted. The parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Further consultation has taken place on the issue of defining parcels through the posing of Q2a in the methodology document and the Council's responses to consultation representations on this issue are also shown under Q2a.
9	Alexandra	Burke	Hagley Parish Council	NPPF Para 170 requires protection for valued landscapes a similar exercise might be combined with the Green Belt Review to determine which areas of landscape are more vulnerable.	Alongside Part 2 of the Green Belt assessment and site selection process, further evidence will be required to assess landscape considerations in terms of existing value and the potential impact of new development. The Site Selection process will consider landscape value, if through this process it is deemed that certain landscapes need further protection, in line with the NPPF this will be undertaken.
12	Lisa	Winterbourn	Lickey and Blackwell Parish Council	Object. Feel that there will be a reduced need for greenbelt to be developed as housing need has been overestimated.	Comment noted - this comment relates more to the questions posed in the Strategic Issues section of the Issues and Options consultation document. Housing need in relation to the plan period for the BDP Review is still to be determined. It is however already acknowledged in the adopted BDP (2017) that there is insufficient brownfield land and/or non Green Belt land to accommodate future development, including an outstanding requirement for 2,300 dwellings to meet housing need in the period 2011-2030, in Bromsgrove District. Therefore it is considered necessary for a Green Belt Assessment to inform the BDP Review.
19	Steven	Bloomfield	Worcestershire Wildlife Trust	Generally supportive of the proposed methodology, including the two stage approach, as set out in the consultation document.	Comment of support for two stage process noted.
35	Peter	King	Campaign to Protect Rural England	Regret the need for a review but accept that it is necessary	Comment noted.
39	Andrew	Carter	Homes England	The two part process appears a robust method. With respect to Part 2, it would be reasonable to assess previously promoted sites from the previous Plan Review as well as newly promoted sites	Comment of support for two stage process noted. Sites that are considered in Part 2 of the Green Belt assessment will be informed by the site selection process and identified from a range of sources.
43	Mark	Sitch	Barton Willmore	Support the approach of a two part process. This will provide developers, investors and other stakeholders with an opportunity to feed into and inform the review.	Comment of support for two stage process noted.
44	Kathryn	Ventham	Barton Willmore	Agree with a two part process and would welcome chance to comment on the Part 1 assessment when it is complete. This will ensure stakeholders are able to participate in the process and should be made clear in the methodology.	Comment of support for two stage process noted. It is proposed that the revised methodology will be published alongside initial Green Belt (Part 1) assessment work.
45	Kathryn	Ventham	Barton Willmore	Agree with a two part process and would welcome chance to comment on the Part 1 assessment when it is complete. This will ensure stakeholders are able to participate in the process and should be made clear in the methodology.	Comment of support for two stage process noted. It is proposed that the revised methodology will be published alongside initial Green Belt (Part 1) assessment work.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
48	Grace	Allen	CBRE	Appears to be a logical approach. Recommend that all Green Belt sites submitted through the Issues and Options and Call for Sites exercise should be considered at the second stage to ensure that the assessment for site selection is fair and measured taking into account reasonable alternatives, as required by NPPF paragraph 35.	Comment of support for two stage process noted. All sites submitted to the Council, from all sources will undergo assessment through the site selection process, which will ultimately inform sites considered at Part 2 of the Green Belt assessment.
51	Gemma	Jenkinson	Claremont Planning	Have concerns in respect of the two part process in respect of the ability of large scale spatial assessment to overlook suitable development sites and recognise smaller elements of such parcels that are suitable for release. Selection of land parcels at Stage 1 vary significantly in size, scale and existing land uses, have significant reservations about whether the findings of the initial assessments will be robust/effective. Not clear how the finding of Stage 1 will be utilised to identify smaller areas that don't fulfil Green Belt functions adequately. Especially relevant when the strategic options are considered. If the dispersal option is progressed, the higher level assessment of Stage 1 could disregard opportunity areas on the periphery of settlements if the overall strategic function of a much larger parcel was prioritised. The avocation that smaller sites would in some way be judged on Green Belt purposes based upon the effectiveness of wider strategic areas of the Green Belt is inappropriate and ineffective. The Green Belt Assessment is only one part of a much wider process of identifying development sites.	Comment noted - the parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
52	Tom	Ryan	Claremont Planning	Addition of clarification text is advised that explains that the high scoring purpose of a large parcel through the Part 1 assessment still has the prospect of identifying smaller areas for removal via the Part 2 analysis. Both stages of the assessment should take into account the existing evidence base, whilst part 2 should also take into account promotional materials submitted alongside sites.	Comment noted - the parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place. It is acknowledged that following the Part 1 process if land parcels are deemed to strongly fulfil Green Belt purposes a site within that land parcel may still be suitable for development.
53	Gemma	Jackson	Claremont Planning	Disagree with the two part process for assessing Bromsgrove's Green Belt. Addition of clarification text is advised that explains that the high scoring purpose of a large parcel through the Part 1 assessment still has the prospect of identifying smaller areas for removal via the Part 2 analysis. Both stages of the assessment should take into account the existing evidence base, whilst part 2 should also take into account promotional materials submitted alongside sites.	Comment noted - the parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place. It is acknowledged that following the Part 1 process if land parcels are deemed to strongly fulfil Green Belt purposes a site within that land parcel may still be suitable for development. All evidence submitted to the Council regarding promoted sites will be considered at the relevant time in the process.

### Summary of Responses to Green Belt Purposes Assessment Methodology (Consultation Draft September 2018)

URN	First Name	Last Name	Organisation	Representation	Officer Response
53	Gemma	Jackson	Claremont Planning	It is not clear from the methodology how the findings of Stage 1 will be utilised to identify smaller areas within larger parcels that do not fulfil Green Belt functions adequately. This could mean overlooking potential sites for release. This is especially relevant when considering a dispersal option for development. The advocacy that smaller sites would be in some way be judged on Green Belt purposes based upon the effectiveness of wider strategic areas of the Green Belt is inappropriate and ineffective.	Comment noted - the parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place. It is acknowledged that following the Part 1 process if land parcels are deemed to strongly fulfil Green Belt purposes a site within that land parcel may still be suitable for development.
53	Gemma	Jackson	Claremont Planning	The Green Belt Assessment is only to review the function of the land in respect of that designation, not its sustainability measures, capacity for development, accessibility or other development merits and therefore the Green Belt Assessment is only one part of a much wider process of identifying development sites. Demonstration of this is the emerging options consideration of expansion to address Birmingham's cross-boundary housing requirements, which would be ineffectual if the Green Belt separating Bromsgrove with Birmingham was identified to be of such strategic importance through the Stage 1 Assessment that no releases were considered suitable.	Comment noted. Bromsgrove District Council are working with Birmingham City Council to consider the Bromsgrove Green Belt in relation to the Green Belt land that falls within Birmingham's administrative area.
54	Katherine	Else	Claremont Planning	Don't agree with the 2 part process. Land parcels vary significantly in size, scale and existing land uses, have significant reservations about whether the findings will be robust. Due to the scale of the parcels, those that score well in terms of GB purpose may result in some small scale development opportunities from being overlooked where they may be located on the edge of these larger parcels, adjacent to existing settlements.	Comment noted - the parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place. It is acknowledged that following the Part 1 process if land parcels are deemed to strongly fulfil Green Belt purposes a site within that land parcel may still be suitable for development.
56	Peter	Chambers	David Lock Associates	Support the GB Purposes Assessment as forming an inherent and aligned part of the local plan review. Two part process supported in principle.	Comment of support for two stage process noted.
56	Peter	Chambers	David Lock Associates	This assessment - where the high level assessment will govern any subsequent spatial strategy - does pre-suppose that Green Belt considerations override other any wider growth objectives and consequent choices over its spatial distribution. If this is, or is not the case, it needs to be made explicit prior to the request for information as part of the Call for Sites.	It is proposed there will be no overall conclusion drawn for individual parcels (as consulted on via Q2g of the methodology document) assessed during Part 1 so that they are not deemed to override other considerations, such as future development needs and existing constraints, in combination with the Green Belt Assessment will determine a sustainable spatial strategy for the District Plan review.
63	Fiona	Lee-McQueen	Framptons	Principle of two part process is agreed however concerns relating to the filtering out of sites from Part 1 to Part 2. It would be inappropriate to discount a whole parcel at the early stages of the assessment when, upon further consideration, a section of it may be appropriate for development.	Part 1 of the process will not filter out any sites. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. It is acknowledged that following the Part 1 process if land parcels are deemed to strongly fulfil Green Belt purposes a site within that land parcel may still be suitable for development.

**Summary of Responses to Green Belt Purposes Assessment Methodology (Consultation Draft September 2018)**

URN	First Name	Last Name	Organisation	Representation	Officer Response
64	Peter	Frampton	Framptons	Not fully. The resource implications in undertaking a Green Belt Review are recognised. Hence some high level assessment of strategic parcels may be helpful in focusing the sight search process on smaller units of land area. However, even where strategic parcels perform well against the purposes of the Green Belt, such as high level analysis should not be exclude a detailed assessment of GB sites within these strategic areas especially where small parcels of land adjoin existing urban areas. Example; I act for owners of a parcel of land on Twatling Road which forms a small part of a significant strategic Green Belt parcel (CC3). The characteristics of the land are quite distinct from the remainder of the GB parcel which may serve to maintain a gap between Barnt Green & the Conservation. Detailed assessment of smaller parcels within the larger parcels is needed.	Comment noted - Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt, however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
65	Louise	Steele	Framptons	The principle of a two-part process for assessing Bromsgrove's Green Belt is agreed, however, how the Part 1 assessment results are utilised, and the filtering process from the Part 1 to Part 2 assessment needs clarification. It is unclear how or if the results of the Part 1 assessment will be utilised or influence the selection of sites taken forward into Stage 2.	Comment noted. Part 1 will not rule any sites out of consideration prior to the Part 2 process taking place. Part 1 will set out the context of the Green Belt parcel prior to Part 2; however the two parts are independent and seek to achieve different things.
65	Louise	Steele	Framptons	Considering that the Part 1 assessment is intended to provide 'high level review of the Green Belt' and given also that the Part 1 assessment will be appraising 'medium to large parcels' it would be reasonable to assume that only broad characterisations can be determined from the initial appraisal. As such no sites should be excluded from consideration in the Part 2 assessment based on the Part 1 results alone.	Comment noted - Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt, however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
76	Emily	Vyse	GVA	No objection to principle of a two stage process.	Comment of support for two stage process noted.
77	John	Pearce	Harris Lamb	Yes. Agree and welcome the two part process. Using a two part process which includes desk top research and site visits is widely considered standard practice. However, methodology doesn't appear to take account of landscape character. The desk based analysis should make reference to the detailed Worcestershire Landscape Character Assessment. This should be checked on site to enable a thorough understanding. Should also be included as a consideration when defining the boundaries of land parcels for assessment. Would not want part 1 assessment to negate the potential assessment of specific Green Belt sites in the Part 2 Assessment. Would want to avoid the potential to discard possible sites through the Part 2 process if they were in an area that may perform well on a strategic level against the five purposes.	Landscape character will form part of the Site Selection Methodology. The Worcestershire Landscape Character Assessment is an evidence base document which will inform the BDP Review at the site allocation stage.  Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
78	Sean	Rooney	Harris Lamb	Yes agree and welcome. Whilst generally supportive of the approach, would not want the Part 1 assessment to negate the potential assessment of specific GB sites in the Part 2 assessment. Want to avoid the potential to discard possible sites through the Part 2 process if they were in area that may perform well on a strategic level against the five purposes of the GB. Consider the overall approach to the GB assessment to be constraints led, and as such, the benefits of bringing specific sites forward can be overlooked.	Comment noted - Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt, however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
80	John	Pearce	Harris Lamb	In principle agree with two part process.	Comment of support for two stage process noted.

**Summary of Responses to Green Belt Purposes Assessment Methodology (Consultation Draft September 2018)**

URN	First Name	Last Name	Organisation	Representation	Officer Response
82	Sean	Rooney	Harris Lamb	Agree in principle. Our understanding is that no sites or parcels will be discounted on the basis of the Part 1 assessment; just because a parcel performs in such a way against the five purposes, does not automatically translate that a smaller area or site within the parcel will perform exactly the same. We would want to avoid discarding sites within the parcel from further assessment.	Comment noted - Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt, however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
83	Patrick	Downes	Harris Lamb	Two part process agreed and welcomed. However, would not want the Part 1 assessment to dismiss whole parcels when there may be smaller sites within parcels with development potential.	Comment noted - Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt, however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
84	Patrick	Downes	Harris Lamb	Agree with and welcome the two part process. Wouldn't want the Part 1 Assessment to necessarily negate potential assessment of specific Green belt sites in the Part 2 assessment. Just because a strategic parcel performs in a particular way against the five purposes, doesn't automatically translate that a smaller area/site within the parcel will also perform exactly the same.	Comment noted - Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt, however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
86	Rebecca	Anderson	Iceni Projects	Consider Stage 1 survey has limited benefits. The parcels to be reviewed do not relate to sites that might be developed and so the conclusions will be meaningless. We welcome the proposal to use the Phase 2 study to focus on these sites and use these conclusions to inform decisions on which sites to allocate. The Phase 1 Study can only be used to provide limited context.	Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete a baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.
88	Abbie	Connelly	Lichfields	Agree with the approach of giving more attention to a smaller number of areas, following an initial sieve of opportunities. Consider it would be beneficial to consult on the conclusions of the Part 1 Assessment before proceeding to the detailed Part 2 assessment, this will provide an opportunity to scrutinise the Council's initial sieve of sites that will not progress to Part 2. Welcome that the Call for Sites process will form part of the Part 2 analysis. We would request clarity regarding the proposed timescales for the two part Green Belt Assessment.	Comment noted - Green Belt Part 1 assessment will be published in advance of the Part 2 analysis and alongside the next stage of consultation for the BDP Review.
91	Max	Plotnek	Maddox Planning	Two part process is supported.	Comment of support for two stage process noted.
98	Sally	Oldaker		Yes, seems sensible	Comment of support for two stage process noted.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
99	Mark	Dauncy	Pegasus	Not clear as to how Part 1 will inform the emerging spatial strategy or the Part 2 Detailed Assessment of Green Belt sites. It is considered that there is merit on just focusing on a more detailed Green Belt review of sites, once a spatial strategy and alternatives have been developed, informed by other evidence and consultation.	<p>Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete a baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.</p> <p>There will be no overall conclusion drawn for individual parcels (as consulted on via Q2g of the methodology document) assessed during Part 1 so that they are not deemed to override other considerations, such as future development needs and existing constraints, in determining a sustainable spatial strategy for the District Plan review. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review.</p>
107	John	Jowitt	PJ Planning	Yes, it is sensible to undertake the assessment as a two-part process.	Comment of support for two stage process noted.
110	Gareth	Sibley	RCA Regeneration	Two-phased approach is welcomed.	Comment of support for two stage process noted.
111	Gareth	Sibley	RCA Regeneration	Agree with the two-part process	Comment of support for two stage process noted.
112	Gareth	Sibley	RCA Regeneration	Welcome a two phased approach. Greatest concern is the division of land parcels around defensible fixed and permanent features. Strongly encourage the potential to sub divide parcels further. As individual sites are further assessed we also encourage consideration of potential softer boundaries. In design terms, hard edges to developments are not necessarily desirable on the ground.	Comment noted. The parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for this is set out in the methodology document. Further consultation has taken place on the issue of defining parcels through the posing of Q2a in the methodology document and the Council's responses to consultation representations on this issue are also shown under Q2a.
113	Gareth	Sibley	RCA Regeneration	Welcome a two phased approach.	Comment of support for two stage process noted.
117	Darren	Oakley	RPS Group	Do not have any fundamental objection with a 2 stage review process in principle. Process should result in an evidence base that informs the proposed amendment to Green Belt boundaries and releases land parcels from the Green Belt. Should assist the process by identifying those Green Belt areas that have potential to meet development needs of the District and Neighbouring areas during the plan period and beyond. It is not made clear as to the process by which the GB boundaries will be amended and/or sites proposed for release from GB designation. Request further clarification from the Council on this, with the opportunity to provide comments prior to issuing the outputs from stage 5 at preferred options stage.	Comment of support for two stage process noted. Part 2 of the Green Belt Assessment is proposed to consider potential locations for development and their impact on the Green Belt, in the wider context of potential Green Belt release and amendment to boundaries to enable development allocations to be made. Allocations for development will be made through the BDP Review. There will be further opportunity to engage with this review.
119	Darren	Oakley	RPS Group	Do not have a fundamental objection with a two-stage review process in principle.	Comment noted.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
119	Darren	Oakley	RPS Group	The process should result in an evidence base that supports the primary objective of informing the proposed amendment to the GB boundaries and release land parcels from the GB. The GB assessment and review should assist this process by identifying those GB areas that have potential to meet the development needs of the District and neighbouring areas during the plan period and beyond. This would assist all parties in understanding why certain GB sites are proposed for release and those that are to be retained as GB. However, Table 1 states that this is not the purpose of the assessment. Consequently it is not made clear as to the process by which the GB boundaries will be amended and/or sites proposed for release from GB designation. Further clarification on this matter is therefore requested with an opportunity to make comments, prior to it issuing outputs from Stage 5. The commentary in this aspect (para 2.6 and 3.9) provide little clarification, merely stating that decisions on sites will be made in a 'holistic way'.	Comment of support for two stage process noted. Part 2 of the Green Belt Assessment is proposed to consider potential locations for development and their impact on the Green Belt, in the wider context of potential Green Belt release and amendment to boundaries to enable development allocations to be made. The Green Belt Assessment in isolation will not allocate land for development. The Part 2 Green Belt Assessment will be used in combination with other evidence base studies, which will in turn inform the BDP Review which will propose development sites.
122	Michael	Davies	Savills	Yes, we agree that a two part process is appropriate for assessing Bromsgrove's Green Belt. Particular consideration should be given for the detailed assessment of Green Belt sites. This is an important part of the process when identifying parcels that are appropriate for release.	Comment noted.
123	Michael	Burrows	Savills	Yes, we agree that a two part process is appropriate for assessing Bromsgrove's Green Belt. Particular consideration should be given to the detailed assessment of Green Belt sites. This is an important part of the process when identifying parcels that are appropriate for release.	Comment noted.
125	Alastair	Thornton	Simply Planning	Agrees with the 2 part process. A logical approach to focussing Green Belt release.	Comment of support for two stage process noted.
126	Rachel	Best	Stansgate Planning	The GB assessment should be a single stage process, not two-part. A single stage can be achieved by considering smaller parcels around the edge of settlements and larger parcels in countryside areas between settlements. A single stage assessment will inform site identification and will help speed up the plan review process. It appears disjointed in that in Part One, the assessment is proposed of very large parcel sizes which include distinctly different features within them; and Part Two appears unrelated to the outcome of Part One as it assesses specific sites that have come by a filtering process having regard to other constraints.	Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.
127	Rachel	Best	Stansgate Planning	Should be a single stage process, not two parts. Single stage can be achieved by considering smaller parcels around edge of settlements and larger parcels in countryside areas between settlements. The study should focus on areas around the edges of settlements where there is potential for sites for development to be identified. Two part structure won't be effective in highlighting areas that perform weakly against GB purposes. Should be that Green Belt Assessment informs the separate site selection analysis rather than the site being selected and then Part 2 assesses impact on Green Belt. An example of a single stage approach is Solihull's Strategic Green Belt Assessment 2016 - single stage approach with two categories of assessment parcels is useful. In Bromsgrove's case the separation between refined parcels and broad areas will be a logical distinction between different roles and characteristics of land and allow a more focussed assessment of the locations most likely to be analysed for development. Then allows a lower level assessment of specific features of sites within parcels as part of site selection process.	Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
128	Rachel	Best	Stansgate Planning	Should be a single stage process, not two parts. Single stage can be achieved by considering smaller parcels around edge of settlements and larger parcels in countryside areas between settlements. The study should focus on areas around the edges of settlements where there is potential for sites for development to be identified. Example of single stage approach is Solihull Strategic GB Assessment with parcels identified as broad areas and refined parcels which will allow for a more focused assessment of locations most likely to be analysed for development.	Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.
129	Rachel	Best	Stansgate Planning	The Green Belt Assessment should be a single stage process, not two-part. A single stage can be achieved by considering smaller parcels around the edge of settlements and larger parcels in countryside areas between settlements. A single stage assessment will inform site identification and will help speed up the plan review process. The Green Belt Assessment is a review of how the existing Green Belt is performing against the purposes set out in the NPPF however the introduction to the Assessment Methodology is clear that the reason it is needed is to allow for identification of sites for housing and employment to meet needs in the plan period and beyond. Therefore, it follows that the study should focus on areas around the edges of settlements where there is potential for sites for development to be identified. As it is proposed to be structured with two parts it will not be effective in highlighting areas that perform weakly against Green Belt purposes that will inform locations considered for development in the filtering process. It appears disjointed in that in Part One, the assessment is proposed of very large parcel sizes which include distinctly different features within them; and Part Two appears unrelated to the outcome of Part One as it assesses specific sites that have come by a filtering process having regard to other constraints. It should be that that Green Belt Assessment informs the separate site selection analysis rather than the site being selected and then Part Two Green assesses the impact on Green Belt. An example of a single stage approach is that of Solihull Strategic Green Belt Assessment 2016 and whilst it has flaws, its single stage approach with two categories of assessment parcels identified as Broad Areas and Refined Parcels, is useful.	Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.
130	Rachel	Best	Stansgate Planning	The GB assessment should be a single stage process, not two-part. A single stage can be achieved by considering smaller parcels around the edge of settlements and larger parcels in the countryside areas between settlements. A single stage assessment will inform site identification and will help speed up the plan review process. As it is proposed to be structured with two parts it will not be effective in highlighting areas that perform weakly against GB purposes that will inform locations considered for development in the filtering process.	Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.



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URN	First Name	Last Name	Organisation	Representation	Officer Response
131	Rachel	Best	Stansgate Planning Consultants Ltd	<p>Should be a single stage process. Can be achieved by considering smaller parcels around the edge of settlements and larger parcels in countryside areas between settlements. This will help speed up the plan review process. The study should focus on areas around the edges of settlements where there is potential for sites for development to be identified.</p> <p>As proposed it will not be effective in highlighting areas that perform weakly against GB purposes that will inform locations considered for development in the filtering process. Part 2 appears unrelated to the outcome of Part 1 as it assesses specific sites that have come by a filtering process having regard to other constraints. The assessment should inform the separate site selection analysis. Refers to the Solihull Strategic GB Assessment 2016. Its single stage approach with two categories of assessment parcels identified as Broad Areas and Refined Parcels is useful.</p>	<p>Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.</p>
132	Rachel	Best	Stansgate Planning	<p>The GB assessment should be a single stage process, not two-part. A single stage can be achieved by considering smaller parcels around the edge of settlements and larger parcels in the countryside areas between settlements. A single stage assessment will inform site identification and will help speed up the plan review process. As it is proposed to be structured with two parts it will not be effective in highlighting areas that perform weakly against GB purposes that will inform locations considered for development in the filtering process.</p>	<p>Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.</p>
133	Rachel	Best	Stansgate Planning	<p>Should be a single stage process, not two parts. Single stage can be achieved by considering smaller parcels around edge of settlements and larger parcels in countryside areas between settlements.</p> <p>The study should focus on areas around the edges of settlements where there is potential for sites for development to be identified.</p> <p>Two part structure won't be effective in highlighting areas that perform weakly against GB purposes. Should be that Green Belt Assessment informs the separate site selection analysis rather than the site being selected and then Part 2 assesses impact on Green Belt. An example of a single stage approach is Solihull's Strategic Green Belt Assessment 2016 - single stage approach with two categories of assessment parcels is useful. In Bromsgrove's case the separation between refined parcels and broad areas will be a logical distinction between different roles and characteristics of land and allow a more focussed assessment of the locations most likely to be analysed for development. Then allows a lower level assessment of specific features of sites within parcels as part of site selection process.</p>	<p>Comment noted - the purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt some in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.</p>
134	David	Barnes	Star Planning	<p>Welcome the comment that there will be a difference between assessment of the GB purposes of a parcel and a potential development site within a parcel (para.3.2). Commentary about contribution of a parcel should be kept at a high level and should not suggest that any parcel, part of a parcel, or site is to be excluded from site selection work. A more focused single stage approach would be a better use of resources rather than undertaking the broad brush parcel approach for the whole of the District. The GB assessment should be directed by the delivery of development in sustainable locations, such as around the conurbation including Hagley, Bromsgrove, and larger villages such as Barnt Green.</p>	<p>Comment noted - Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt, however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place. The purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt some in 1975, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It</p>

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URN	First Name	Last Name	Organisation	Representation	Officer Response
					is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.
137	Matthew	Fox	Turley	Consider the proposed two-part process is logical	Comment of support for two stage process noted.
137	Matthew	Fox	Turley	Part 1 will need to acknowledge and consider the findings of the Strategic Green Belt Review undertaken as part of the SGS.	Comment noted - the GBHMA Strategic Growth Study will be considered in the preparation of any Bromsgrove Green Belt Assessments, however the SGS has a very limited role with regard to any Green Belt assessments undertaken locally.
137	Matthew	Fox	Turley	BDC should consider Green Belt Assessment methodologies adopted by other authorities across the HMA to ensure consistency. Recent assessments have been, or are being, undertaken by Solihull, Lichfield, and South Staffordshire.	Comment noted - examples of Green Belt Assessments undertaken by other local authorities have been, and continue to be, reviewed for ideas of best practice.
153	Elizabeth	Mitchell	Mitchell Planning	Two stages of consideration make sense with such a large land area, though concerns (see later GBPAM reps) about overlap with site selection process.	Comment regarding support for two stage process, notwithstanding concerns about site selection process, is noted.
161	Ian	Macpherson		Yes.	Comment of support for two stage process noted.
176	Mr & Mrs J D	Winslow		The two-part process for assessing Bromsgrove's Green Belt is regarded as appropriate but we stress the need for comprehensive, up to date and accurate information.	Comment of support for two stage process noted.
185	Paul	Frost		Agree with the two part process.	Comment of support for two stage process noted.
190	Philip	Ingram		Do not object to the two stage methodology for reviewing the Green Belt.	Comment of support for two stage process noted.
190	Philip	Ingram		The second stage detailed review should not rule out any sites within any of the Strategic Parcels in this context [there is considerable scope for Green Belt alterations within all Parcels without impinging on the Green Belt aims and purposes of the Parcels as a whole].	Comment noted - Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt, however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
194	Darren	Oakley	RPS	No fundamental objection with a two-stage review process in principle, as long as the process results in an evidence base that supports the primary objective of the GB review, which is to inform the proposed amendment to GB boundaries and release of land parcels from the GB.	Comment of support for two stage process noted. Part 2 of the Green Belt Assessment is proposed to consider potential locations for development and their impact on the Green Belt, in the wider context of potential Green Belt release and amendment to boundaries to enable development allocations to be made.
<b>2a. Do you agree with the 60 proposed parcels for conducting the Part 1 of the Green Belt Purposes Assessment?</b>					
127	Rachel	Best	Stansgate Planning	Client's land falls within Strategic Green Belt Parcel NE9 & NE10 (Heath Farm, Wythall). Concerned that these parcels include a large areas of land, occupied by two golf courses. Parcels not considered to be representative of the Green Belt role of land on the edge of Wythall settlement. Parcel sized should be reduced and include land that immediately relates to the built up area of Wythall. A more refined approach to identify smaller parcels on the edge of settlements/built up edge of metropolitan areas is needed. Parcels are too large and don't allow for different impact of areas of very different character within them. Assessment of the large parcels proposed will not be reflective of the role/contribution an area on the edge of a settlement makes to GB purposes. Parcels should be smaller around the edge of settlements.	It is agreed that the parcels presented are large. The purpose of Part 1 is to consider the Districts Green Belt in its entirety and how the Green Belt performs against the defined Green Belt purposes. The parcels have been drawn up using strong defensible boundaries, following best practice guidance. With regard to Wythall specifically, the parcels in this area are some of the smallest parcels within the whole assessment. However, It is accepted that the character of the parcels will be varied throughout. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study; no sites will be removed for any purpose during this Assessment. The purpose of the Assessment is to consider how the Bromsgrove Green Belt performs against the purposes of the Green Belt. Therefore the varying nature of the parcels of land is not an issue at this stage and will be taken into account. A finer grain assessment as proposed will be completed during the more detailed Part 2 assessment, at which point individual sites will be assessed against the Green Belt purposes.
56	Peter	Chambers	David Lock Associates	It is unclear whether any subsequent redrawing of the parcel boundaries for assessment (para 2.10) in Part 2 will be published for consultation, or will form part of the evidence base.	If parcel boundaries are amended this will be shown in the revised Methodology. This will be provided for information purposes only.

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56	Peter	Chambers	David Lock Associates	The parcels are so large that the approach runs the risk of failing to accurately assess the whole of each parcel against the GB purposes. An overall 'binary' conclusion on the strength of each large parcel based on assigned numbers should not be made.	It is agreed that the parcels presented are large. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes, this is a significant task. It is accepted that the character of the parcels will be varied throughout. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study; no sites will be removed for any purpose during this Assessment. The parcels have been drawn up using strong defensible boundaries, following best practice guidance. For clarification, there is no intention to assign numbers to land parcels or any other forms of marking system to the identified land parcels under Part 1.
45	Kathryn	Ventham	Barton Willmore	Taylor Wimpey site falls within Parcel NE6. Consider that it should be assessed as a standalone parcel.	At this stage individual sites will not be used as site boundaries. Individual sites and their contribution towards the Green Belt purposes will be considered during the Part 2 Assessment following the call for sites.
174	Michael	Corfield		Do not agree with the 60 parcels. The parcels should be much more even in size to enable them to have equal 'weight' in terms of GB area. With some imagination all of the smaller parcels could be joined with others to equalise the size of the parcels. This would also reduce the number of parcels, resulting in less reporting/summarising - saving time and money. Even though there is no intention of stating overall contribution from an individual parcel, bigger parcels will naturally contain more reasons for GB protection than smaller parcels.	The nature of the way the land use parcels have been drawn up (using strong, defensible boundaries) has resulted in land parcels being uneven in nature. This will not have a bearing on how the parcels are assessed. It is accepted that due to the large nature of the land parcels the character of the parcels will be varied throughout. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study.
53	Gemma	Jackson	Claremont Planning	Small scale development at the edges abutting existing settlement boundaries could assist the council in meeting their housing numbers without resulting in a significant loss to more sensitive areas of the Green Belt. The concern is that the initial strategic approach of land suitability could simply re-establish the overall function of Green Belt within Bromsgrove and that small-scale suitable development sites may be overlooked as a result of the findings of the strategic stage 1 assessment.	It is acknowledged that there are small scale development opportunities abutting existing settlements, this will become more apparent during the call for sites. However, part 1 of the Green Belt Assessment will be to consider how the whole Bromsgrove Green Belt functions against the purposes of the Green Belt as set out in the NPPF. It will be during the Part 2 assessment to consider how individual sites function against these purposes. Therefore development opportunities within the larger land parcel will not be overlooked as they will be assessed separately.
65	Louise	Steele	Framptons	Para 2.10 states "Following desktop analysis and site visits, there may be the potential for the parcel boundaries to be altered..." It is considered that an appraisal of boundaries as described above should be included as formal element of the Part 1 assessment. This would allow some appreciation of variation of performance against Green Belt parameters within large parcels.	As paragraph 2.10 of the Draft Green Belt Assessment Methodology states, the process of reconsidering a boundary would only occur where a current boundary appears weak or poorly defined and a stronger boundary can be identified. It would be unnecessary to review every boundary on site as in many instances there are multiple boundaries that could be selected. All aspects of the Green Belt parcels will be assessed in terms of how it functions against the purposes, the boundary will not affect this level of assessment.
65	Louise	Steele	Framptons	The 60 strategic land parcels are very large and it would be inappropriate to discount a whole parcel at the early stage of the assessment where upon further consideration of it may be appropriate for development.	It is not the intention of the study to discount land parcels, the assessment will not lead to parcels being discounted nor allocated for development. The purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt some 40+ years ago, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to gather baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken.
43	Mark	Sitch	Barton Willmore	This approach has the potential to discount smaller land parcels within it which may not contribute significantly to the purposes of Green Belt. The contribution of such sites must be recognised and assessed at the earliest stage. Client's site forms part of a wider landholding which extends further to the south. It is requested that the site is reclassified with parcel NE3 including the site area set out within the attached vision statement.	It is not the intention of the study to discount sites or parcels, the assessment will not lead to parcels being discounted nor allocated for development. A more detailed assessment of sites will be conducted through the Part 2 assessment process. No sites boundaries will be reclassified at this stage based on individual development site boundaries. Officers are aware of individual development sites being promoted by Developers which are within the land parcels. These sites will be assessed during Part 2 of the Green Belt assessment.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
53	Gemma	Jackson	Claremont Planning	The parcels vary significantly in size, scale and existing land uses and as such there are significant reservations about whether the findings of the initial assessments will be robust or effective. Explanation of the chosen parcel extents and sizes should be provided to demonstrate they have been related to the existing landscape and established Green belt functions. The advocacy that smaller sites (through Call for Sites) would be in some way judged on Green Belt purposes based upon the effectiveness of wider strategic areas of Green Belt is inappropriate and ineffective.	It is acknowledged that the parcel sizes vary in size and land use type. It is accepted that due to the large nature of the land parcels the character of the parcels will be varied throughout. The intention of the study is to assess the nature of the land as part of its contribution towards the purposes of the Green Belt; therefore the assessment will be robust and effective in this manner. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study. Boundaries have been selected based on them being strong and defensible; in most instances multiple boundaries could have been selected, in these instances the most logical boundary has been selected. The landscape or function of a land parcel will inform part of the assessment when each site is assessed against the Green Belt purposes. It is not the intention of the study to assess smaller sites based on the results of the larger parcels of land, they are two distinct parts.
111	Gareth	Sibley	RCA Regeneration	Our greatest concern is the division of land parcels around 'defensible' fixed and permanent physical features. Some of those land parcels are very large. On that basis, we strongly encourage the potential to sub-divide parcels further if there are permanent features that could provide a defensible and enduring boundary.	Paragraph 2.10 of the Draft Green Belt Assessment Methodology states that if a boundary is weak or poorly defined this may be altered where a stronger boundary can be selected. It would be unnecessary to reconsider the subdivision of sites as in many instances there are multiple boundaries that could be selected. All aspects of the Green Belt parcels will be assessed in terms of how it functions against the purposes, the boundary will not affect the level of assessment. Part 2 will provide the opportunity to assess individual sites against the Green Belt purposes.
56	Peter	Chambers	David Lock Associates	Do not object to the principle of defining the study area and land parcels for Green Belt Assessment purposes.	Comments noted.
1	Tammy	Williams	Alvechurch Parish Council	Agree with the principle of the layout	Comments noted.
56	Peter	Chambers	David Lock Associates	For consistency, we suggest reference should be made to the method and criteria for assessment used by Land Use Consultants in the work already undertaken in the GB Reviews (Coventry and Warwickshire joint study and Cannock Chase Review). This would allow a comparable and consistent assessment to be undertaken across the conurbation.	Agreed, these studies have informed the methodology.
58	Karin	Hartley	Delta Planning	Whilst most Green Belt Assessments differentiate between the Green Belt and the urban edge and the rural areas, in the main by identifying smaller more refined parcels at the urban edge and broad Green Belt parcels elsewhere, the suggested approach by Bromsgrove doesn't make such a distinction. Consider that this broad brush approach won't provide sufficient level of detail needed to provide a thorough Green Belt review and inform possible alterations of the boundaries to accommodate required growth. More refined parcels should be identified at the urban edge. Client's land is included in Parcel C7 which is dissected by Old Burcot Lane - we consider this provides a permanent feature that could be used to distinguish the land to the north from the land to the south and divide this GB parcel in two for a more refined assessment.	The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes and there are multiple ways of completing this task. The varying nature of the parcels of land is not an issue at this stage and will be taken into account as each land use parcel will be assessed in detail. A more fine grained assessment will be completed during the Part 2 assessment. The purpose of the study is not to consider altering boundaries to accommodate growth. If this does become an issue to consider the appropriate work will be conducting then to ensure that this is done robustly and fairly, however this is not the intention of the Green Belt Assessment. Each land parcel could be divided in multiple ways using various boundaries; the boundaries that have been selected are based on their strong, permanent features and have been informed using the NPPF guidance and best practice.

### Summary of Responses to Green Belt Purposes Assessment Methodology (Consultation Draft September 2018)

URN	First Name	Last Name	Organisation	Representation	Officer Response
65	Louise	Steele	Framptons	A number of the parcels are very large. While it is appreciated that a two-stage process is proposed, with a more fine grain assessment being undertaken in Part 2, it is likely that Green Belt functionality will vary widely within each parcel during the Part 1 assessment. It is unclear how this is to be addressed or reported upon at the end of Part 1, and how those results are then filtered into the Part 2 assessment.	It is agreed that the parcels presented are large. The purpose of Part 1 is to consider the Districts Green Belt in its entirety and how the Green Belt performs against the defined Green Belt purposes. The parcels have been drawn up using strong defensible boundaries, following best practice guidance. It is accepted that the character of the parcels will be varied throughout. The implications of this will not be to discount any areas of land and no sites will be removed for any purpose during this Assessment. The varying nature of the parcels of land is not an issue at this stage and will be taken into account. A more fine grained assessment will be completed during Part 2. A broad assessment of the Bromsgrove Green Belt (Part 1) has not been completed since the Green Belt was defined and therefore it is felt that this stage is necessary before the more detailed assessment is undertaken. Part 1 will lead into Part 2 as the broad assessment will provide an indication as to how the land parcel functions before conducting a more thorough, detailed assessment.
65	Louise	Steele	Framptons	Inconsistency between para 2.3 and 3.5. 3.9. It is unclear why the edges of settlements, rivers, streams or woodland have not been utilised in determining strategic parcel boundaries for the Part 1 assessment. All such features would be clearly identifiable on Ordnance Survey maps and would arguably result in a more logical distribution of strategic parcels of land for assessment. Relying only on roads, canals and railway lines (while relatively permanent) are not necessarily readily recognisable in wider landscape contexts, and likely to result in weak boundaries in Green Belt terms with potentially little clear differentiation between assessment parcels.	It is not considered the paragraphs are inconsistent, however there is more detail provided in paragraph 3.5 of the Draft Methodology as to what constitutes a robust boundary. The boundaries listed in paragraph 3.5 have been used in drawing up the parcels. When drawing up the boundaries the most obvious, robust boundary has been selected.
63	Fiona	Lee-McQueen	Framptons	It is considered that refinement is needed to the proposed parcels of land. It is considered that other permanent features, such as existing settlements, rivers and woodland should also be considered when determining the proposed land parcels. For example, land parcel NE6 includes land within Wythall and then land to the west and east of Wythall up to the District boundary. It would be more appropriate to use the existing settlement, as a permanent feature, to have one parcel of land for the area within Wythall, located between Alcester Road and Lea Green Lane, and a further two separate parcels for the areas to the east of Wythall and to the west of Wythall which perform more of a separating function to the conurbation. These three parcels would perform very differently when considered against the five purposes of the Green Belt and therefore should not be considered as one.	Each land parcel could be divided in multiple ways using various boundaries; the boundaries that have been selected are based on their strong, permanent feature. It is accepted that the land parcels have a varying character within them. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study.
35	Peter	King	Campaign to Protect Rural England	Do not understand the construction of the boundaries. Everyone knows the objective for carrying out this assessment is to identify land suitable for release for development. Suitable land for development might be allocated next to Bromsgrove, next to existing large villages, infill and land next to smaller villages or a new settlement.	Detail is provided in paragraph 3.5 of the Draft Methodology as to how the boundaries have been selected. When drawing up the boundaries the most obvious, robust boundary has been chosen. The purpose of Part 1 is to consider how the Bromsgrove Green Belt performs against the purposes of the Green Belt. The assessment will not remove land from the Green Belt. This study is an evidence base study which will inform the BDP Review. It is the BDP which will make allocations and recommend removal of land from the Green Belt, if appropriate and needed.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
131	Rachel	Best	Stansgate Planning Consultants Ltd	Client's land falls within Strategic GB Parcel S5 and concern is expressed that this parcel includes a large area of land extending beyond the built up edge to the District Boundary. Parcel S5 isn't considered to be representative of the GB role of land on the edge of Stoke Prior particularly where land has an existing use such as caravan site and Sports and social club. Parcel is too large and of very different character throughout. Parcel size should be reduced and include only land that immediately relates to the built up edge of Stoke Prior. An assessment of the large parcels proposed will not be reflective of the role and contribution an area on the edge of a settlement makes to GB purposes, as compared to a broad area of countryside between settlements. Parcels should be smaller around the edge of settlements.	It is accepted that due to the large nature of the land parcels the character of the parcels will be varied throughout. This will not disadvantage any area of land in any way as the varied nature of the land will be taken into account. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study.
113	Gareth	Sibley	RCA Regeneration	Greatest concern is the division of land parcels around defensible fixed and permanent features. Strongly encourage the potential to sub divide parcels further. As individual sites are further assessed we also encourage consideration of potential softer boundaries. In design terms, hard edges to developments are not necessarily desirable on the ground.	At this stage it is necessary to continue with the Part 1 of the assessment with large parcels due to the significant nature of the task. For the Green Belt Assessment it is important to use strong defensible boundaries to allow the task to be conducted. Part 2 will assess individual sites in more detail. The parcels as drawn up for Part 1 do not in any way relate to development boundaries. Individual sites being promoted for development will be assessed during Part 2.
80	John	Pearce	Harris Lamb	One of the parcels (NW2) equates to the whole of a site that is being promoted. This begs the question of whether the Council will assess the site differently through the Part 1 and Part 2 exercises. If not, does the strategic parcel need to be amalgamated with one of the adjoining parcels?	The land parcels have been drawn up based on the prevalence of strong, defensible boundaries. It is not intentional that Part 1 of the assessment relates to the boundaries of a development site that is being promoted; if there are circumstances where the boundaries do correlate there will be no implications of this on the results of the study. The parcels will be treated in a consistent, uniform manner to each other and through the two parts of the study. Part 1 will assess how the Green Belt functions against the purposes of the Green Belt in broad terms, whereas Part 2 will be a more detailed assessment of individual sites.
2	Gill	Lungley	Barnt Green Parish Council	Believe that there should be transparency in how these parcels have been drawn up.	The Green Belt Purposes Assessment Methodology sets out how the parcels have been drawn up. In particular paragraph 3.5 sets out how the boundaries have been selected to form the parcels.
125	Alastair	Thornton	Simply Planning	In agreement with the proposed land parcels for conducting Part 1. Welcome the inclusion of Parcel S2. This is a logical GB release immediately to the SE of Bromsgrove.	Comments noted.
90	Owen	Jones	LRM Planning	It is right that the parcels proposed are broad areas based on permanent features such as motorways, roads, railways and canals. It is important that the assessment of strategic areas is able to distinguish between parts of the strategic parcel that have different characteristics. Within strategic parcels will be areas of land that individually perform a function to a greater or lesser extent and will have different strengths. It is therefore important that the assessment draw conclusions not only about a strategic parcel as a whole but parts or areas within a strategic parcel.	Agreed. The varying character of the land parcel will be taken into account. Individual sites will be considered during Part 2 of the study.
170	Malcolm	Price		The Strategic Parcel S2 would provide the area of land required for the short/medium term housing development.	It is not the purpose of this study to consider which areas of land will be suitable for future development. The Green Belt Assessment will not remove land from the Green Belt. The Study is an evidence base study which will inform the BDP Review. It is the BDP which will propose allocations if appropriate.
107	John	Jowitt	PJ Planning	The Strategic Land Parcel boundaries should be informed more by the prevailing character of the landscape than permanent physical features such as transport corridors, which are of less relevance to Green Belt considerations. Whilst it is acknowledged that the parcel boundaries have been mapped to permanent features such as transport corridors, in our view the boundary of Parcel C7 should be modified because it encompasses two very different areas of land, divided by a distinct line of hills to the north-	The prevailing character of the land parcel will be taken into account when assessing each land parcel. It is based on good practice and guidance within the NPPF that strong, defensible boundaries are used. With regard to individual land parcels, Paragraph 2.10 of the Draft Green Belt Assessment Methodology states that if a boundary is weak or poorly defined this may be altered where a stronger boundary can be selected. Individual sites will be assessed during Part 2 of the Study.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
				east of Bromsgrove. To the south-west of the hills, the land is strongly associated with the urban edge of Bromsgrove, with a clear relationship with the town, whilst to the north-east the land is associated with the surrounding countryside and strongly reflects the prevailing landscape character. We therefore recommend that this could be addressed by either dividing parcel C7 in to two parts, or alternatively the land to the north-east of the hill crests could be associated with the adjacent parcel C8.	
82	Sean	Rooney	Harris Lamb	Client is promoting site in Parcel S6; we agree this is an appropriate parcel however it is important that the merit of small sites that are included in larger assessment parcels is not overlooked during the assessment should the outcome be that the wider parcel performs well against the GB purposes.	It will be part of the Green Belt assessment to look at each aspect of the land parcels. Part 1 of the assessment takes a more strategic approach whereas Part 2 is more detailed and site specific. It is during part two that these aspects will be considered in further detail.
190	Philip	Ingram		Do not object to the strategic parcels identified, but believe there is considerable scope for Green Belt alterations within all Parcels without impinging on the Green Belt aims and purposes of the Parcels as a whole.	Comments noted.
67	Robert	Davies	Gerald Eve	Agree the GB should be split into parcels, but suggest that land around strategic road junctions should be put into separate parcels, so that they can be assessed as separate entities given that their characteristics in terms of openness and amenity would differ from other parts of the Green Belt.	It is accepted that due to the large nature of the land parcels the character of the parcels will be varied throughout. This will not disadvantage any area of land in any way as the varied nature of the land will be taken into account. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study.
9	Alexandra	Burke	Hagley Parish Council	Don't understand the construction of the boundaries. There are a number of ways in which suitable land for development might be allocated: - Land next to Bromsgrove Town - Land next to existing large villages - Infill and land next to smaller villages - New settlement	The Draft Green Belt Purposes Assessment Methodology sets out exactly how the parcels have been drawn up. In particular paragraph 3.5 sets out how the boundaries have been selected to form the parcels. It is not the intention of this study at this time to allocate land for development. As and when development options are required the options put forward will be considered as part of a comprehensive consideration of development options, this will be in the BDP Review, which will be informed by the evidence base
134	David	Barnes	Star Planning	Some of the parcels are large, especially adjacent to conurbation and around Bromsgrove and the larger villages. These large parcels have different purposes depending on where is assessed. Would be more appropriate to refine these larger parcels, e.g. C2, C3 and C4, to ensure assessment is more targeted. At Hagley it would be more appropriate for smaller parcels to be identified around the whole settlement, similar to ones to north and west, to ensure consistency of approach.	It is agreed that the parcels presented are large. It is agreed that there will be a varying land uses and character within the parcels, this will be taken into account when completing the study and will not lead to any disadvantages for the land parcels. With regard to the land parcel size, strong, defensible boundaries have been selected based on what is available in that particular area. Although the parcel sizes are varied between Hagley and the North West of Bromsgrove this will not have any detrimental impact upon the assessment of the land parcel, as each area of land will be assessed.
122	Michael	Davies	Savills	In a broad sense we agree with the 60 proposed parcels. With particular reference to parcel C1, we agree with the parcel proposed. However, when more detailed assessment is undertaken, it should be considered that a defensible boundary can be formed along Woodrow Lane and Halesowen Road.	For the majority of the land parcels alternative boundaries could have been selected. Boundaries were chosen based on their strength and what was present in the vicinity. It is not necessary to consider altering the boundaries for the assessment unless there is an anomaly on site which would trigger this to be reconsidered. This would be done in line with paragraph 2.10 of the Draft Methodology document.
86	Rebecca	Anderson	Iceni Projects	We consider the parcels are too large to be helpful.	It is agreed that the land parcels are large, there will be no disadvantage to the study by having the large land parcels, as the Green Belt needs to be assessed in its entirety through this study. Smaller sites will be assessed during Part 2 of the study.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
128	Rachel	Best	Stansgate Planning	Client's land is within Parcel C8 and concern is expressed that this parcel is not representative of the GB role of land adjacent to Blackwell as the parcel is too large and varied in character. Parcel size should be reduced and include land that immediately relates to built-up area of Blackwell. A more refined approach to identify smaller parcels on the edge of settlements/built up edge of metropolitan areas is needed. Parcels are too large and don't allow for different impact of areas of very different character within them. Assessment of the large parcels proposed will not be reflective of the role/contribution an area on the edge of a settlement makes to GB purposes. Parcels should be smaller around the edge of settlements.	It is accepted that due to the large nature of the land parcels the character of the parcels will be varied throughout. This will not disadvantage any area of land in any way as the varied nature of the land will be taken into account. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study. Smaller sites will be assessed during Part 2 of the study.
76	Emily	Vyse	GVA	We would recommend at the outset that parcels NE1 and NE2 are modified / reduced in size (plan submitted). Do not agree that the Review should stop at the District boundary. There are several instances in which doing so has the potential to generate erroneous results. Two such examples lie adjacent to our Client's land which is either within or abuts NE1 and NE2. Here, the review should assess the land between NE1, NE2 and the conurbation.	Following the consultation process it is agreed that the assessment will consider land that is outside of the District boundary. The District Council will work with neighbouring authorities to ensure that a comprehensive assessment takes place. Statements of Common Ground will be utilised later in the Plan process where necessary.
76	Emily	Vyse	GVA	We have nervousness about Stage 1 being conducted on the basis of the parcels that the Council has defined, some of which are very large indeed and are not at all representative of the scale of land releases that will need to be made to satisfy the District's housing requirement. The larger the parcel, the greater the likelihood that it will be found to make a strong contribution to the purposes of the Green Belt but the less relevant such an assessment would actually be when it comes, ultimately, to identifying land for development. We take some comfort from paragraph 2.10 of the consultation document but, if, following the desktop analysis and site visits, Officers do indeed conclude that certain parcels should be split to enable a finer grain analysis, these interim conclusions should be the subject of consultation so that they may be checked and challenged by interested parties.	It is agreed the land parcels are large; however large land parcels will not have any implications on the assessment of the land. It is accepted that the land parcels will have a varying character within them and this will be considered during the assessment process. It is not the intention of Part 1 to consider the land parcels, as defined, in terms of land release for development. The intention of this study is to consider how the Green Belt performs against the purposes of Green Belt as set out in the NPPF. Individual sites will be assessed against the Green Belt purposes during Part 2.
35	Peter	King	Campaign to Protect Rural England	NW4 should be split	Paragraph 2.10 of the Draft Green Belt Assessment Methodology states that if a boundary is weak or poorly defined this may be altered on site where a stronger boundary can be selected. It would be unnecessary to reconsider the subdivision of sites at this stage as in many instances there are multiple boundaries that could be selected. All aspects of the Green Belt land parcels will be assessed in terms of how it functions against the purposes, the boundary will not affect the level of assessment.
185	Paul	Frost		All 60 parcels should be included in the Part 1 assessment.	Agreed.
35	Peter	King	Campaign to Protect Rural England	W2 ought to be added to W3	It is not the intention of this stage to split or merge land parcels. Paragraph 2.10 of the Draft Green Belt Assessment Methodology states that if a boundary is weak or poorly defined this may be altered on site where a stronger boundary can be selected. It would be unnecessary to reconsider the subdivision of sites at this stage as in many instances there are multiple boundaries that could be selected. All aspects of the Green Belt land parcels will be assessed in terms of how it functions against the Green Belt purposes, the boundary will not affect the level of assessment.



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URN	First Name	Last Name	Organisation	Representation	Officer Response
59	Karin	Hartley	Delta Planning	Whilst most Green Belt Assessments differentiate between the Green Belt and the urban edge and the rural areas, in the main by identifying smaller more refined parcels at the urban edge and broad Green Belt parcels elsewhere, the suggested approach by Bromsgrove doesn't make such a distinction. Consider that this broad brush approach won't provide sufficient level of detail needed to provide a thorough Green Belt review and inform possible alterations of the boundaries to accommodate required growth. More refined parcels should be identified at the urban edge.	It is not the intention at this stage to split land parcels any further. All land will be assessed as part of the Green Belt assessment regardless of land parcel size. It is not the purpose of the study at this stage to consider accommodating growth, but to assess how the Green Belt performs against the purposes of the Green Belt as set out in the NPPF. Part 2 will assess individual sites that are being proposed against the Green Belt purposes. It will be the BDP Review which will propose allocations for development if necessary.
35	Peter	King	Campaign to Protect Rural England	SE10 needs to be divided so that the setting of Hewell Park and land is assessed separately from Brockhill East and West and other land capable of development.	Paragraph 2.10 of the Draft Green Belt Assessment Methodology states that if a boundary is weak or poorly defined this may be altered on site where a stronger boundary can be selected. It would be unnecessary to reconsider the subdivision of sites at this stage as in many instances there are multiple boundaries that could be selected. All aspects of the Green Belt land parcels will be assessed in terms of how it functions against the purposes, the boundary will not affect the level of assessment. Individual sites will be assessed during Part 2 of the Study.
2	Gill	Lungley	Barnt Green Parish Council	No - does not agree with the 60 proposed parcels because no reasoning has been given for the differences in size. It seems that there are more small parcels adjacent to existing settlements.	Detail is provided in paragraph 3.5 of the Draft Green Belt Purposes Assessment Methodology as to how the boundaries have been selected. When drawing up the boundaries the most obvious, robust boundary has been chosen. The purpose of this study is to consider how the Bromsgrove Green Belt performs against the purposes of the Green Belt. It is acknowledged that the parcels do vary in size; this will not have a detrimental impact upon the assessment as each area of land will be assessed.
45	Kathryn	Ventham	Barton Willmore	Agree with the approach of using landmarks and clear physical boundaries to define boundaries.	Comments noted.
35	Peter	King	Campaign to Protect Rural England	S7 includes some largely unspoilt countryside around Grafton Manor and land south of Breakback Hill that is within (or might be added to) the Whitford Road development site. Ridge-lines are important landscape features, which might become robust new boundaries for the GB.	Comments noted. Sites may be submitted during the call for sites process.
35	Peter	King	Campaign to Protect Rural England	S2 comprises both land near Bromsgrove Station, which might be eligible for allocation as near a transport hub, and more distant areas unlikely to be needed. The eastern boundary seems to be the canal, but the ridge line from Upper Gambolds Farm to Stoke Court appears to be a strong landscape feature for a new GB boundary.	Comments noted. Sites may be submitted during the call for sites process.
88	Abbie	Connelly	Lichfields	Raise concerns regarding the fact that varying sizes of the assessment parcels could have a significant impact on the analysis and its results. Note that in some cases the gaps between settlements comprises only a very small no of large parcels. Effect of this may be that a large area might be excluded from further consideration even though the contribution to the GB purpose varies across that area and parts of that parcel may be entirely appropriate for future development. Varying scale is likely to have an impact on all the criteria set out in Table 2 of the GB Purposes Assessment Methodology document and may result in whole areas achieving a score that is only suited to part of the parcel. Recommends that all of the parcels should be of a similar size and that care should be taken to ensure that a consistent approach is taken in respect of the assessment of different parts of the District. This could be achieved through the subdivision of some parcels to ensure that they are all more equally sized.	It is acknowledged that land parcels do vary in size. This will not have a detrimental impact upon the assessment as all Green Belt land needs to be assessed to consider how it functions against the purposes of the Green Belt. It is acknowledged that there may be a few large land parcels between settlements, Officers are aware of this. There will be a varied character throughout a land parcel, this is accepted and will be considered when assessing the land parcel. The land parcels do not need to be of an even size to ensure they are assessed consistently; this will be a fundamental part of the assessment and one of the purposes of Table 2 in the Draft Green Belt Purposes Assessment Methodology.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
115	John	Breese	Rosconn Strategic Land	Object to the 60 parcels as currently identified for the Part 1 Green Belt Purposes Assessment. It is considered that a finer grained assessment particularly through increasing the number of parcels identified around Bromsgrove and the Larger Settlements at this stage is more appropriate so more meaningful conclusions can be drawn. The proposed extent of parcels which are adjacent to settlements as currently drawn may give an inaccurate assessment of the different contribution different areas within the parcel make to the Green Belt purposes. The methodology makes reference for the potential parcel boundaries to be altered following desktop analysis and site visits. RSL would support the ability to be flexible in assessing different sections within the larger parcels at a later stage which could be overlooked because elements of the larger parcel do not perform well.	It is acknowledged that land parcels do vary in size. This will not have a detrimental impact upon the assessment as all Green Belt land needs to be assessed to consider how it functions against the purposes of the Green Belt. There will be a varied character throughout a land parcel, this is accepted and will be considered when assessing the land parcel. The land parcels do not need to be of an even size to ensure they are assessed consistently; this will be a fundamental part of the assessment and one of the purposes of Table 2 in the Draft Green Belt Purposes Assessment Methodology.
12	Lisa	Winterbourn	Lickey and Blackwell Parish Council	No. Brownfield sites should be developed first.	Brownfield sites form part of the housing target put forward through the District Plan. Brownfield opportunities have been maximised and will still continue to be a fundamental part of the housing strategy.
51	Gemma	Jenkinson	Claremont Planning	There is no real justification for the selection process and the sites vary significantly in size scale and existing land uses. The site at Bittell Road falls within Parcel C4; the Parcel encompasses the whole of Bittell Reservoir and a significant amount of agricultural land. In effect small scale development at the edges abutting existing settlement boundaries could assist the Council in meeting housing numbers without significant loss to more sensitive areas of the GB. Initial strategic approach of land suitability could simply re-establish the overall function of Green Belt within Bromsgrove.	It is accepted that due to the large nature of the land parcels the character of the parcels will be varied throughout. This will not disadvantage any area of land in any way as the varied nature of the land will be taken into account. It is not the intention of this study to allocate land for development. Officers are aware of sites being promoted by Developers that are within the Green Belt land parcels. These sites may be submitted again during the Call for Sites process.
138	Charles	Robinson	Twelvetwentyone	Parcels are acceptable, however, must be acknowledged that they straddle areas where development should take place. Areas within the parcels perform well against GB purposes but where smaller parcels can be released without major impact. Sites should still be assessed at a site level.	Potential development sites will be assessed later on in the process at Part 2. The purpose of this study is to consider how the Green Belt performs against the Green Belt purposes as set out in the NPPF. It is acknowledged that there may be a variation within the land parcels with regard to suitability for development; however this is not the intention of Part 1 of the study to consider. Part 2 will consider a sites contribution to the Green Belt purposes.
45	Kathryn	Ventham	Barton Willmore	It is important that the assessment is refined to ensure all sites are considered on an equitable basis. The assessment process as currently set out does not ensure parity in assessment as some sites are far larger than others which has the potential to rule out potentially suitable sites contained within a larger parcel.	Although it is acknowledged that some parcels are larger than others, all sites will be treated equally. It is not the intention of this assessment to allocate sites or dismiss sites. Officers are aware and acknowledge that development sites are being promoted within large land parcels and these will be assessed during Part 2.
176	Mr & Mrs J D	Winslow		The identification of 60 proposed parcels for conducting Part 1 of the Green Belt review omits Foxlydiate. You have stated that Foxlydiate has been removed from the Green Belt (GBPAM para.1.7.) yet, given the opportunity that the review of a Local Plan provides for a re-examination of Green Belt boundaries (GBPAM para.1.8), the changed circumstances relating to Redditch's housing land requirements (I and O para 4.22), and your statement that Bromsgrove's Green belt will be reviewed in its entirety (GBPAM para. 2.2), it would be logical to include Foxlydiate in your considerations. Much of the information, relating to the characteristics of the Foxlydiate Green Belt parcel, already exists and would simply need updating to bring it into line with the approach to be adopted elsewhere in the District. Our answer to S1 10, in the I and O consultation, discusses further the ambiguous position of Foxlydiate.	Foxlydiate has been removed from the Green Belt (through the adopted Bromsgrove District Plan) and therefore it would be remiss to treat this as a Green Belt site. Officers acknowledge that because this development site is yet to be built out its treatment through the Green Belt Assessment must be carefully considered. Therefore within the Green Belt Methodology Question 2f was posed which asks views on how to treat the adjacent Green Belt parcels to the development sites that are not yet complete. It is not considered appropriate to consider the actual development sites as Green Belt, as they no longer are.

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54	Katherine	Else	Claremont Planning	Significant reservations, there is no real justification for the site selection process and the sites vary significantly in size, scale and existing land uses. Consortium's land falls in Parcel SE10 - a huge land parcel that stretches from Redditch in the south to Copley Hill in the north.	It is acknowledged that the sites do vary in size, scale and land use. This will not disadvantage any land parcel, all will be treated equally.
179	Neil	Gow	Burcot Garden Centre	No, in the case of Parcel C7, we struggle to see how a rural area of farmland, a built up village and an open developed area of a golf course can be assessed sensibly as one.	Land parcels do vary in their land use. This will be considered when assessing each land parcel. When drawing up the land parcels each area would inevitably have a varied land use within them. Each land parcel could be divided in multiple ways using various boundaries; the boundaries that have been selected are based on their strong, permanent features and have been informed using the NPPF guidance and best practice. It is accepted that the land parcels have a varying character within them. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study.
151	Dawn	Macqueen		The parcelling of the green belt cuts across hamlets (e.g. Holt End) and small communities and may force landowners to sell part of their land.	The boundaries of the Part 1 Green Belt Purposes Assessment do not represent potential development sites.
161	Ian	Macpherson		Yes, but the disparity in size may give strange results.	The land parcels do vary in size, however this will not have a detrimental effect on the assessment, each parcel will be treated on an equitable basis.
6	Rebekah	Powell	Catshill and North Marlbrook Parish Council	Request to change the boundaries of the Catshill Parish parcels - C1, C12 and a small part of C2. It is suggested that C1 is revised to include that part of C2 that covers North Marlbrook. Aim is to marry up the two top level parcels with the 25 parcels identified in the Neighbourhood Plan.	Paragraph 2.10 of the Draft Green Belt Assessment Methodology states that if a boundary may be altered on site where a stronger boundary can be selected. It would be unnecessary to reconsider the subdivision of sites as in many instances there are multiple boundaries that could be selected. It is not necessary at this stage to align land parcels with neighbourhood plan boundaries.
117	Darren	Oakley	RPS Group	It is not clear how Part 1 outputs will be applied at detailed site assessment stage. Consider this raises some fundamental concerns as to the relevance and usefulness of the Part 1 assessment and the credibility of the overall review process. For the GB assessment to provide any meaningful evidence it should focus on Part 2, stage 1-3 matters relating to individual site proposals that come out of the filtering and selection analysis. Question the merit of assessing the entire Green Belt in Bromsgrove. The key questions should be "Is it appropriate to amend the GB boundaries to exclude those sites that pass the RAG rating?" This would align with NPPF paras 138- 139 which focuses on the GB boundaries rather than every part of it.	Part 1 is intended to give a broad assessment of the current state of the Bromsgrove Green Belt. The Green Belt has not be considered for many years and therefore it is considered important at this stage to consider how the Green Belt is currently functioning against the Green Belt purposes. Part 2 provides a more significant level of detail to the assessment process, considering individual sites. The suggested approach is one way of completing the assessment. This Green Belt Assessment will be conducted in accordance with the NPPF and in particular the paragraphs within Chapter 13 - Protecting Green Belt Land.
73	Stephen	Farley		The fate of the Green Belt seems pre-determined by the structure of the documents and phrasing of the questions.	The Draft Methodology sets out an intended process for assessing the Green Belt and has purposefully set out questions to allow consultees to engage in the process. The results of this consultation process have resulted in changes to the Methodology process and therefore how the Green Belt will be assessed. It is not the intention of this document to predetermine the results of the assessment.
48	Grace	Allen	CBRE	On a strategic level, the 60 proposed sites are appropriate and understand the reasoning for the varying size parcels. The assessments of these parcels should come with a caveat that smaller areas within the parcels may have differing qualities and therefore the wider assessment should not exclude site selection at a later stage.	Agreed and comments noted.
60	Sara	Jones	Delta Planning	Most Green Belt Assessments differentiate between the GB at the urban edge and the rural areas, in the main by identifying smaller more refined parcels at the urban edge and broad Green Belt parcels elsewhere. Consider that the broad brush approach won't provide the sufficient level of detail needed to provide a thorough review of the Green Belt. More refined parcels should be included at the urban edge. In particular consider that parcel NE3 should be split up into smaller parcels with the urban fringe land between the built up area of Kings Norton and Chinn Brook delineated as separate parcels from the more rural areas to the south.	It is agreed that the parcels presented are large. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes. The parcels have been drawn up using strong defensible boundaries, following best practice guidance. Part 2 of the Green Belt Assessment will consider each land parcel in detail regardless of its location. At this stage parcels will not be split or merged any further.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
73	Stephen	Farley		If a population surplus issue is not challenged or even discussed against a dwindling natural space that is finite then the next generation will be beholden to the might of developers behaving with impunity.	The planning process responds to population projections put forward by the Office of National Statistics. A Development Plan is put forward which responds to these projections by setting out how much development should be built and where. One of the purposes of the Local Plan is to prevent unsustainable ad hoc development.
129	Rachel	Best	Stansgate Planning	Land in Green Belt Parcel NE4 includes a large area of land of varying character that as a whole, is not considered to be representative of the Green Belt role of land on the immediate edge of the settlement of Wythall. The area of Parcel NE4 comprises a multitude of small fields and the parcel size should be reduced using field boundaries to include land that immediately relates to the built-up area of Wythall. A preferable refined approach to identify smaller parcels on the edge of settlements and the built-up edge of the metropolitan area is needed, rather than the 60 large parcels identified in Figure 3: Proposed Strategic Green Belt Parcels. The parcels are too large and do not allow for the different impact of areas of very different character within them. Green Belt land immediately adjoining the built-up areas performs a different role to those areas of Green Belt within the more rural areas. An assessment of the large parcels proposed will not be reflective of the role and contribution an area on the edge of a settlement makes to Green Belt purposes, as compared to a broad area of countryside between settlements. Parcels should be smaller around the edge of settlements and our comments made in respect of Q1a suggest an approach with smaller 'Refined Parcels' around the edge of settlements and 'Broad Areas' for the open countryside areas between settlements. Furthermore, the definition of parcels within these two categories enables a focused assessment of the performance of the Green Belt.	It is agreed that the parcels presented are large. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes. The parcels have been drawn up using strong defensible boundaries, following best practice guidance. Part 2 of the Green Belt Assessment will consider sites that have been put forward in detail regardless of its location. At this stage parcels will not be split or merged any further. It is accepted that the character of the parcels will be varied throughout. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study; no sites will be removed for any purpose during this Assessment. The purpose of the Assessment is to consider how the Bromsgrove Green Belt performs against the purposes of the Green Belt. Therefore the varying nature of the parcels of land is not an issue at this stage and will be taken into account. A finer grain assessment as proposed will be completed during the more detailed Part 2 assessment.
33	Steve	Colella	District Councillor	Understood that sites due to be assessed are of differing sizes. This will bring a disadvantage to the smaller sites in terms of likelihood of being developed easier but this equally means the investment gap cannot be filled.	It is acknowledged that the land parcels are of a varying size, each parcel will be treated equally and assessed on an even basis. This assessment will not prevent or promote sites being used for development. Sites will be assessed during Part 2.
91	Max	Plotnek	Maddox Planning	Disagree with the proposed land parcels. The parcels are too large. Smaller parcels should be assessed within the large parcels as there may be some areas within excluded parcels that have development potential whilst still ensuring that the purposes of the Green Belt are fulfilled.	It is accepted that the land parcels are large. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes. The parcels have been drawn up using strong defensible boundaries, following best practice guidance. Although it is acknowledged that some parcels are larger than others, all sites will be treated equally. It is not the intention of this assessment to allocate sites or dismiss sites. Officers are aware and acknowledge that development sites are being promoted within large land parcels and these sites can be assessed against the purposes of the Green Belt during Part 2
52	Tom	Ryan	Claremont Planning	In line with the NPPF, smaller and medium sized sites can make positive and significant contributions to the supply of housing, therefore the identification of a range of scales in terms of sites to be considered for GB release should be incorporated in the strategic methodology.	It is not the intention of the Green Belt Assessment to allocate sites. The Purpose of the study is to consider how the Green Belt functions against the Green Belt purposes as set out in the NPPF.
52	Tom	Ryan	Claremont Planning	Concerns regarding the selection of land parcels to be assessed at stage 1. These vary significantly in size, scale and existing land uses and as such we have reservations about whether findings will be robust. Due to the scale, those that score well in terms of their GB purpose may result in small scale development opportunities from being overlooked, including those on the edge of settlements.	It is accepted that the land parcels are large. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes. The parcels have been drawn up using strong defensible boundaries, following best practice guidance. Although it is acknowledged that some parcels are larger than others, all sites will be treated equally. It is not the intention of this assessment to allocate sites or dismiss sites. Officers are aware and acknowledge that development sites are being promoted within large land parcels.

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114	Charles	Robinson	Rickett Architects	Parcels are acceptable; however they straddle areas where development should take place. There are areas within the parcels that perform well against GB Purposes but where smaller parcels can be released without major impact/conflict with these Green Belt purposes/objectives. Sites should still be assessed at a site level.	It is not the intention of the Green Belt Assessment to allocate sites. The Purpose of this study is to consider how the Green Belt functions against the Green Belt purposes as set out in the NPPF. It is accepted that small sites may perform differently to the larger land parcel they form part of. This will become apparent through the two stage process that is being used and these sites can be assessed against the purposes of the Green Belt during Part 2
44	Kathryn	Ventham	Barton Willmore	Council should consider the issue of defensible boundaries outside the District fully and not use it as a tool to discount sites. Stage this will be considered and how it will be done needs to be set out. Paragraph 3.8 is welcomed and should be repeated in Part 1 of the methodology.	Agreed. Defensible boundaries outside of the borough will be considered. The District Council will work with neighbouring authorities to ensure the Green Belt Assessment is comprehensively completed and where necessary Statements of Common Ground will be in place.
44	Kathryn	Ventham	Barton Willmore	Agree with using landmarks and clear physical boundaries to define parcels. Parcel S7 has been clearly demarcated using the M40 [sic] as a barrier which is a sensible approach.	Noted.
130	Rachel	Best	Stansgate Planning	Land within parcel NW7 includes a large swath of land of greatly varying character including the small villages of Clent, the edge of Hagley and the large area of open countryside towards the edge of the metropolitan area at Hayley Green. The parcel size should be reduced and should include land that immediately related to the built-up area of Clent and exclude the large area of countryside. A preferable refined approach to identify smaller parcels on the edge of settlements and the built-up edge of the metropolitan area is needed, rather than the 60 large parcels identified in Figure 3. The parcels are too large and do not allow for the different impact of areas of very different character within them. An assessment of the large parcels proposed will not be reflective of the role and contribution an area on the edge of a settlement makes to the GB purposes, as compared to a broad area of countryside between settlements.	It is acknowledged that land parcels do vary in size. This will not have a detrimental impact upon the assessment as all Green Belt land needs to be assessed to consider how it functions against the purposes of the Green Belt. There will be a varied character throughout every land parcel, this is accepted and will be considered when assessing the land parcel. It is accepted that small sites may perform differently to the larger land parcel they form part of. This will become apparent through the two stage process that is being used.
123	Michael	Burrows	Savills	In a broad sense we agree with the 60 proposed parcels. The assessment should however recognise that smaller areas within the parcels should be able to come forward for development based on the presence of physical boundaries.	It is not the intention of this study to allocated land. Officers are aware of development sites being promoted within the larger land parcels and these may be submitted through the Call for Sites process and will be assessed during the Part 2 assessment.
110	Gareth	Sibley	RCA Regeneration	Concerned with the division of land parcels around 'defensible' fixed and permanent physical features. Some of those land parcels are very large. Strongly encourage the potential to sub-divide parcels further if, upon more detailed inspection, there are permanent features such as long-established hedgerow, drainage ditches and other watercourses and features that could provide a defensible and enduring boundary.	Paragraph 2.10 of the Draft Green Belt Assessment Methodology states that if a boundary is weak or poorly defined this may be altered on site where a stronger boundary can be selected. It would be unnecessary to reconsider the subdivision of sites as in many instances there are multiple boundaries that could be selected. All aspects of the Green Belt parcels will be assessed in terms of how it functions against the purposes, the boundary will not affect the level of assessment.
83	Patrick	Downes	Harris Lamb	Generally no concern regarding the parcels, but it is necessary to consider the sub elements of the parcels which may make different contributions to the Green Belt. The potential of sub parcels to be released for development should not be dismissed because the overall parcel has strong Green Belt credentials.	It is accepted that the land parcels are large. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes. The parcels have been drawn up using strong defensible boundaries, following best practice guidance. Although it is acknowledged that some parcels are larger than others, all sites will be treated equally. It is not the intention of this assessment to allocate sites or dismiss sites. Officers are aware and acknowledge that development sites are being promoted within large land parcels. These sites will be assessed during Part 2 of the Assessment.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
75	Rachel	Mythen	GVA	Agree in principle, that parcels should be defined by permanent features to ensure a defensible boundary, should the parcel be released from the Green Belt. However, they express concerns regarding the scale of parcels sizes within the GB methodology. The proposed methodology comprises large parcels which are of a significant size, each of which undoubtedly performs and fulfils at least one or more of the core purposes of the Green Belt, as defined in the NPPF. As a result, there is a need to define parcels at an appropriate scale, so as not to produce potentially ambiguous or contradictory results. For instance, a large parcel extending from the edge of a settlement into the open countryside is likely to strongly meet purposes 1, 2 and 3 of the Green Belt. However, a smaller section of this parcel, located closer to a settlement boundary is less likely to be considered to meet these purposes.	It is accepted that the land parcels are large. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes. There will be a varied character throughout every land parcel, this is accepted and will be considered when assessing the land parcel. Smaller parts of the larger land parcel will be assessed during Part 2; Consultees can submit sites to be assessed through Part 2 of the Green Belt Assessment alongside other sites the Council are aware of.
99	Mark	Dauncy	Pegasus	Considered that the Part 1 Strategic Assessment of the Green belt is an unnecessary stage in the process. Moving straight to a more detailed assessment of Green Belt sites would negate the need to identify medium/large parcels and enable the Council to focus on assessment of specific development options. It is not clear why the District's Green Belt has been divided up in this way and what makes the parcels distinctive from each other.	The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes, this task has not been completed since the Green Belt was defined and therefore it is felt that a broad view of the Green Belt is necessary before the more detailed assessment is undertaken. The parcels have been divided up based on the presence of strong defensible boundaries, it is not intended that the parcels are distinctive from each other. Smaller sites will be assessed during Part 2 of the Green Belt Assessment.
78	Sean	Rooney	Harris Lamb	Main concern with parcel C4 is that it includes land that is located on the border of the existing urban areas of Birmingham, such as the land at Groveley Lane and more open expansive areas of land that perform more of GB role. Think it is important that the merit of small sites included with larger assessment parcels is not overlooked.	It is accepted that the character will vary within the Green Belt parcel; this will be considered when conducting the assessment. Officers are aware of small development sites being promoted by Developers within the large Green Belt parcels. It is not the intention of this study to allocate land. The small sites can be submitted during the Call for Sites process and will be assessed during Part 2 of the Green Belt Assessment.
39	Andrew	Carter	Homes England	The proposed parcels reflect physical and urban boundaries as defined by settlements and strategic transport routes. Where Green Belt land is split by the M42 the parcels as proposed straddle the strategic route. It is felt that this allows a clear assessment to be undertaken of the value each parcel contributes towards the strategic green belt purposes set out in the NPPF.	Comments noted.
119	Darren	Oakley	RPS Group	Without clarification requested in our response to part 1a, it is not clear how part 1 outputs will be applied at the detailed site assessment stage. Para 3.1 and 3.4 state that the assessment of individual sites will be carried out 'in much the same way' and 'follow much the same steps' as those set out for the part 1 assessment. This raises some fundamental concerns as to the relevance and usefulness of part 1 assessment and, therefore, the credibility of the overall GB review process.	The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes, this task has not been completed since the Green Belt was defined and therefore it is felt that a broad view of the Green Belt is necessary before the more detailed assessment is undertaken. It is intended that the Part 1 assessment will be carried out at a broad level, whereas Part 2 will be much more detailed and site specific. Part 1 will lead into Part 2 as the broad assessment will provide an indication as to how the land parcel functions before conducting a more thorough, detailed assessment at the site specific stage.
133	Rachel	Best	Stansgate Planning	Client's land falls within parcel C8 which includes a large swathe of land extending south of the M42, west of railway line and right across to Lickey End. The parcel size should be reduced and include land that immediately relates to the built up area of Blackwell. A more refined approach to identify smaller parcels on the edge of settlements/built up edge of metropolitan areas is needed. Parcels are too large and don't allow for different impact of areas of very different character within them. Assessment of the large parcels proposed will not be reflective of the role/contribution an area on the edge of a settlement makes to GB purposes. Parcels should be smaller around the edge of settlements.	It is not considered necessary to alter the boundaries at this stage. The land parcels are large but this will not be a detriment to the assessment. It is accepted that due to the large nature of the land parcels the character of the parcels will be varied throughout. The implications of this will not be to discount any areas of land, as this is not one of the purposes of completing this study. It is accepted that the edge of settlement land will perform differently to land that is more open in character, this will all be considered will completing the assessment.

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URN	First Name	Last Name	Organisation	Representation	Officer Response
69	Latisha	Dhir	GVA	<p>Agree in principle that parcels should be defined by permanent features to ensure a defensible boundary. Express concerns regarding the scale of parcel sizes. There is a need to define parcels at an appropriate scale so as not to produce potentially ambiguous/contradictory results. The Council should aim to pragmatically review the potential for the most sustainable settlements to grow. It is recommended that two distinct types of parcels should be identified within the methodology:</p> <p>Type 1: Smaller parcels surrounding and/or within close proximity (up to 500m) to a settlement edge</p> <p>Type 2: Broad areas which represent the main body of the Green Belt.</p> <p>Assessment of these smaller parcels of land should ensure that sites which haven't been judged to make a strong contribution to the Green Belt - with consequent potential for consideration for removal from the Green Belt - have been omitted on account of the large scale of the parcels that were considered.</p>	The land parcels have been suggested based on strong defensible boundaries appropriate to that area. It is not felt necessary to amend the boundaries at this stage. It is accepted that the land adjacent to the urban area will have a different character to that of land further away which is open, however this will be factored into the assessment and will not be a detriment to any area or land parcel. Officers are aware of small sites that are being promoted within the larger land parcel and these sites can be submitted through the Call for Sites and will be assessed during Part 2 of the Green Belt Assessment.
126	Rachel	Best	Stansgate Planning	A Preferable approach to identify smaller parcels on the edge of settlements and the built-up edge of the metropolitan area is needed, rather than the 60 large parcels. The parcels are too large and do not allow for the different impact of areas of very different character within them. GB land immediately adjoining the built-up areas performs a different role to those areas of GB within more rural areas. An assessment of the large parcels proposed will not be reflective of the role and contribution an area on the edge of a settlement makes to GB purposes, as compared to a broad area of countryside between settlements.	It is accepted that the land adjacent to the urban area will have a different character to that of land further away which is open, however this will be factored into the assessment and will not be a detriment to any area or land parcel. Officers are aware of small sites that are being promoted within the larger land parcel. It is accepted that small sites may perform differently to the larger land parcel they form part of. These small sites will be assessed during Part 2 of the Green Belt Assessment.
65	Louise	Steele	Framptons	The method for determining strategic parcels should have been set out in the Green Belt Purposes Assessment Methodology for consultation, with application of the finally agreed method incorporated as a formal 'Part' of the assessment processes.	The method for determining the land parcels has been set out in the Draft Methodology document at paragraphs 2.10 and 3.5, this document has been subject to public consultation.
73	Stephen	Farley		Disagree with the 60 proposed parcels for Green Belt assessment.	Comments noted.
137	Matthew	Fox	Turley	The SGS' review of GB land parcels includes "Parcel S20: between Bromsgrove and Catshill" which covers Parcel C12. This is considered to be an area of local rather than strategic, separation and it is noted that the M42 forms a significant division between the two settlements. It states that the GB maintains a "nominal" degree of separation and the various road corridors (notable the M42 and A38, but also the B4091) form development boundaries. These points will need to be reflected in BDC's GB Assessment.	The Greater Birmingham HMA Strategic Growth Study (2018) is a study that has been completed independent the Bromsgrove Green Belt Assessment. Officers from Bromsgrove Council will be impartial with no predetermined views when conducting assessment of land parcels. This study has been considered but has a very limited role with regard to a local Green Belt assessment.
57	Karin	Hartley	Delta Planning	Whilst most Green Belt Assessments differentiate between the Green Belt and the urban edge and the rural areas, in the main by identifying smaller more refined parcels at the urban edge and broad Green Belt parcels elsewhere, the suggested approach by Bromsgrove doesn't make such a distinction. Consider that this broad brush approach won't provide sufficient level of detail needed to provide a thorough Green Belt review and inform possible alterations of the boundaries to accommodate required growth. More refined parcels should be identified at the urban edge. Client's land is included in Parcel SE4, to allow for a more refined assessment consider that Parcel SE4 should be split into more refined parcels using roads and other permanent features.	It is accepted that the land adjacent to the urban area will have a different character to that of land further away which is open, however this will be factored into the assessment and will not be a detriment to any area or land parcel. Officers are aware of small sites that are being promoted within the larger land parcel; these sites can be submitted through the Call for Sites process and will be assessed through the Part 2 Green Belt Purposes Assessment.
77	John	Pearce	Harris Lamb	Site that clients are promoting is located in parcel S6. Generally in agreement with the extent of the parcel shown and consider this to be a	Comments noted. Land parcels are based on the availability of strong, defensible boundaries in the vicinity of the land parcel. It is not necessary at this stage to

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				robust parcel. Do not have any strong objections to the surrounding parcels immediately adjacent to S6. Query why S1 hasn't been amalgamated into either S2 or SE1?	amalgamate land parcel as all land will be assessed equally regardless of parcel size.
137	Matthew	Fox	Turley	It is requested that parcel C12 is divided into two sites separated by the Stourbridge Road given that this provides a clear boundary between two physically distinct sites and they should therefore be assessed individually.	Paragraph 2.10 of the Draft Green Belt Assessment Methodology states that if a boundary is weak or poorly defined this may be altered on site where a stronger boundary can be selected. It would be unnecessary to reconsider the subdivision of sites as in many instances there are multiple boundaries that could be selected.
139	Glenda	Parkes	Tyler Parkes	Concerned that several of the parcels are too large for any assessment to be meaningful and therefore the findings are likely to be misleading. Evidence based on overly large parcels which include land with a variety of characteristics, will be unsound and unfit for the purpose of trying to quantify how well land performs against the defined purposes. For example, Parcel SE6, which includes our Client's site, is too large. It would be more appropriate in terms of the characteristics of the area for the parcel to be split into two parcels of land, an east and west parcel. The boundary between the two parcels could broadly follow Seafeld Lane. The eastern parcel relates well to the A435 and the M42 which are urban features, unlike the western parcel which is more rural in nature.	It is accepted that the land parcels are large. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes. It is accepted that the land adjacent to the urban area will have a different character to that of land further away which is open, however this will be factored into the assessment and will not be a detriment to any area or land parcel. Officers are aware of small sites that are being promoted within the larger land parcel; these can be submitted through the Call for Sites process and will be assessed during Part 2 of the Green Belt Assessment.
1	Tammy	Williams	Alvechurch Parish Council	Consider that the main parcels around the 6 large settlements and Bromsgrove Town could be published as supplementary larger maps to make interpretation easier.	Comments noted and Agreed. Larger maps will be published alongside the Assessment document.
110	Gareth	Sibley	RCA Regeneration	If it becomes clear that there are areas of larger land parcels where performance is at different levels, encourage the dis-aggregation of those parcels, as good opportunities for potential development could be lost. Given the selection of land parcels is not particularly scientific and not currently related to performance, a sensible and honest assessment would be encouraged to be made in this regard, even if it means re-drawing parcel boundaries.	Paragraph 2.10 of the Draft Green Belt Assessment Methodology states that if a boundary is weak or poorly defined this may be altered on site where a stronger boundary can be selected. It would be unnecessary to reconsider the subdivision of sites at this stage as in many instances there are multiple boundaries that could be selected. It is not the intention of the study at this stage to consider potential development sites and Officers are aware of development sites that are being promoted within larger land parcels, these sites will be assessed during Part 2 of the Green Belt Assessment.
132	Rachel	Best	Stansgate Planning	Parcel N6 includes a large swath of land of greatly varying character including. The parcel size should be reduced and should include land that immediately related to the built-up area of Romsley and exclude the large area of countryside leading up to the metropolitan area. A preferable refined approach to identify smaller parcels on the edge of settlements and the built-up edge of the metropolitan area is needed, rather than the 60 large parcels identified in Figure 3. The parcels are too large and do not allow for the different impact of areas of very different character within them. An assessment of the large parcels proposed will not be reflective of the role and contribution an area on the edge of a settlement makes to the GB purposes, as compared to a broad area of countryside between settlements.	It is accepted that the land parcels are large. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes. It is accepted that the land adjacent to the urban area will have a different character to that of land further away which is open, however this will be factored into the assessment and will not be a detriment to any area or land parcel. Officers are aware of small sites that are being promoted within the larger land parcel; these sites can be submitted through the Call for Sites process and will be assessed during Part 2 of the Green Belt Assessment.
153	Elizabeth	Mitchell	Mitchell Planning	Assessment via the parcels proposed is considered reasonable provided that it is appreciated that sub parcels may perform differently. Such differences will need to be brought out at a later stage as parcels are further subdivided and refined.	Comments noted and agreed.
84	Patrick	Downes	Harris Lamb	Suggest that the immediate environs of Bromsgrove should be the subject of a separate exercise to correct the minor realignment e.g. GB boundaries adjoining the urban area.	It is accepted that the land adjacent to the urban area will have a different character to that of land further away which is open, however this will be factored into the assessment and will not be a detriment to any area or land parcel.



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<b>Q.2b Do you agree with the decision not to assess Bromsgrove's Green Belt parcels against Purpose 5: "To assist in urban regeneration by encouraging the recycling of derelict and other urban land"?</b>					
1	Tammy	Williams	Alvechurch Parish Council	On balance there is a case for not using it for assessing the Bromsgrove Green Belt in the current Review Study.	Agreement noted.
2	Gill	Lungley	Barnt Green Parish Council	Yes – agree that assessing NPPF Green Belt Purpose is not relevant.	Agreement noted.
4	Barry	Spence	Bentley Pauncefoot Parish Council	Disagree with the decision not to assess against Purpose. The consideration of urban land is particularly valuable given the pressure on the District from the GBHMA.	As part of the supporting evidence base for this Plan Review, officers would need to re-assess land availability within the District's urban areas prior to quantifying Green Belt release for thoroughness and to robustly support the release of Green Belt land.
9	Alexandra	Burke	Hagley Parish Council	Purpose 5 doesn't need to be considered as part of a parcel based review, but it is vital that it be considered subsequently in deciding what quantity of land should be released from the Green belt.	Agreement noted. As part of the supporting evidence base for this Plan Review, officers would need to re-assess land availability within the District's urban areas prior to quantifying Green Belt release for thoroughness and to robustly support the release of Green Belt land.
28	Emily	Barker	Worcestershire County Council	Agree that it is acceptable not to assess Green Belt parcels against this purpose	Agreement noted.
31	Rachel	Jones	Better Environment Theme Group	All five purposes should be included and purpose 5 should not be excluded in the process	Disagreement noted.
35	Peter	King	Campaign to Protect Rural England	The object is to recycle brownfield land. It is vital that this be considered before deciding on the quantity of land to be released from the GB, so only limited amount of green field land is available to developers at any time, thus pushing development towards the harder to redevelop urban brownfield sites.	As part of the supporting evidence base for this Plan Review, officers would need to re-assess brownfield land availability within the District's urban areas prior to quantifying Green Belt release for thoroughness and to robustly support the release of Green Belt land.
43	Mark	Sitch	Barton Willmore OBO Church Commissioners	Do not agree with the decision not to assess against Purpose 5. The relationship of the client's site with the adjoining Housing Regeneration Area (Druids Heath & Maypole) is a key benefit which should be taken into account as part of the overall assessment.	Green Belt parcels adjacent to non Green Belt development opportunities will not be discounted without the same level of assessment as all other Green Belt parcels. Furthermore, no parcels will be discounted during the Part 1 process. There may be opportunities for Green Belt land adjacent to non Green Belt development land that could enhance development options without compromise to the Green Belt purposes. This will be taken into account through Part 2 of the Green Belt Assessment and the Site Selection through the Plan Review.
48	Grace	Allen	CBRE Arden Park Properties	Yes. It would be difficult to differentiate between one parcel over another, as all parcels are likely to serve this purpose equally.	Agreement noted.
51	Gemma	Jenkinson	Claremont Planning Spitfire Bespoke Homes	Agree, however, should be taken into account that there are Previously Developed GB sites, areas surrounding existing settlements incorporate urban features and residential homes and garden spaces that should be considered to be previously developed in rural context.	PDL within Green Belt parcels will be considered further through Part 2 of the Green Belt Assessment and the site selection through the Plan Review. However, garden land does not form part of the NPPF Definition of PDL.
52	Tom	Ryan	Claremont Planning Bellway Homes	Support the approach of not seeking to assess the purpose of urban intensification and use of previously developed land. Areas surrounding existing settlements incorporate urban features and residential homes with garden spaces should be considered to be previously developed land in the rural context they exist.	PDL within Green Belt parcels will be noted during the Part 1 parcel assessment and will be considered further through Part 2 of the Green Belt Assessment and the site selection through the Plan Review. However, garden land does not form part of the NPPF Definition of PDL.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	Support the methodology's approach of not seeking to assess the purpose of urban intensification and use of previously developed land, particularly as the last Local Plan Examination and supporting evidence base clearly demonstrated there was insufficient urban land opportunities and previously developed land to accommodate the required scale of development. Hence further assessment along these lines would be inappropriate.	Support noted. However, as part of the supporting evidence base for this Plan Review, officers would need to re-assess brownfield land availability within the District's urban areas prior to quantifying Green Belt release for thoroughness and to robustly support the release of Green Belt land.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	It should be taken into account that there are Green Belt sites that are previously developed or of more developed nature than areas of countryside and farmland; specifically, that the areas surrounding existing settlements incorporate urban features and residential homes with garden	PDL within Green Belt parcels will be noted during the Part 1 parcel assessment and will be considered further through Part 2 of the Green Belt Assessment and site selection through the Plan Review. However, garden land does not form part of the NPPF Definition of PDL.

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				spaces that should be considered to be previously developed in the rural context they exist. As the NPPF advocates previously developed land, should be sequentially preferable it is advocated that even residential garden spaces have a reduced open setting.	
54	Katherine	Else	Claremont Planning Miller Homes	Understand this decision.	Agreement noted
56	Peter	Chambers	David Lock Associates Birmingham Property Services	Support the approach in paras 2.6 and 2.7 for the reasons set out therein.	Agreement noted
76	Emily	Vyse	GVA University of Birmingham	There is insufficient non-Green Belt land to meet the future development needs of the District and the neighbouring authorities. There is therefore a lack of land available to meet the need through urban regeneration alone. It is considered that all Green Belt land should be considered to make a lesser contribution to this purpose until such time that sufficient land to meet the need for the plan period and beyond, has been identified. We therefore agree with the decision not to assess the parcels against purpose 5.	Agreement noted
77	John	Pearce	Harris Lamb Barberry & IM Land	Yes. There seems little point in assessing this purpose as all Green Belt sites will score the same against this criterion.	Agreement noted
78	Sean	Rooney	Harris Lamb Barratt Homes	There seems little point in assessing this purpose, as all Green Belt sites by their nature will score the same against this criterion.	Agreement noted
80	John	Pearce	Harris Lamb Bloor Homes	Yes. If land is not released from the GB it is highly questionable whether the Council will be able to meet the shortfall in housing land provision to meet the District's needs up to 2030. As such, there is no point in assessing sites against this purpose.	Agreement noted
82	Sean	Rooney	Harris Lamb Stoke Prior Developments	BDC has acknowledged that releasing land from GB is necessary to meet housing needs, as such there seems little point in assessing this purpose as all sites by their nature will score the same against this criterion.	Agreement noted
83	Patrick	Downes	Harris Lamb Willowbrook Garden Centre	Agreed.	Agreement noted
84	Patrick	Downes	Harris Lamb Worcestershire Health and Care NHS Trust	Seems little point in assessing the purpose as all GB sites will score the same against this criterion. If all sites will be scored the same, there is no point in assessing a site's performance against this criterion.	Agreement noted
86	Rebecca	Anderson	Iceni Projects Generator Developments	Consider that Purpose 5 would not provide any useful conclusions on the benefit of the GB. Its inclusion would merely skew results and would be more likely to discriminate against sites on the edge of the settlement.	Agreement Noted. Green Belt parcels adjacent to settlements will not be discounted without the same level of assessment as all other Green Belt parcels. Furthermore, no parcels will be discounted during the Part 1 process. There may be opportunities for Green Belt land adjacent to settlements that could enhance development options without compromise to the Green Belt purposes. This will be taken into account through Part 2 of the Green Belt Assessment and site selection through the Plan Review.
88	Abbie	Connelly	Lichfields Taylor Wimpey Strategic Land	The decision not to assess the parcels against Purpose 5 is logical, although it will be important that Bromsgrove District Council ensures that Purpose 5 is dealt with in general terms to ensure that the assessment is robust, and that the Local Plan is safe from challenge.	Agreement Noted. It is considered that it is just as important to clearly explain what doesn't form part of this process as what does form part of the process to ensure that the Plan's evidence base is robust. Paragraphs 2.6 and 2.7 of the Draft Methodology document explains why Purpose 5 has been omitted from the assessment.
98	Sally	Oldaker		Not really - There is old industrial land that could be developed, before going into the GB.	Disagreement noted. As part of the supporting evidence base for this Plan Review, officers would need to re-assess land availability within the District's urban areas including PDL prior to quantifying Green Belt release for thoroughness and to

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					robustly support the release of Green Belt land.
99	Mark	Dauncy	Pegasus Gallagher Estates	Agree that this is a logical decision. All Green Belt has a role to play in assisting in urban regeneration by encouraging the recycling of derelict land.	Agreement noted
107	John	Jowitt	PJ Planning Bromsgrove Golf Course	Yes, this is consistent with similar approaches carried out across England.	Agreement noted
110	Gareth	Sibley	RCA Regeneration Duchy Homes	Approach agreed.	Agreement noted
111	Gareth	Sibley	RCA Regeneration Mr and Mrs Watson	Agree with the approach.	Agreement noted
112	Gareth	Sibley	RCA Regeneration Piper Group	Agree with this approach	Agreement noted
113	Gareth	Sibley	RCA Regeneration CAD Square	Agree with this approach.	Agreement noted
114	Charles	Robinson	Rickett Architects Cawdor	No - contrary to the requirement to recycle Previously Developed Land.	Disagreement noted. As part of the supporting evidence base for this Plan Review, officers would need to re-assess land availability within the District's urban areas, including PDL, prior to quantifying Green Belt release for thoroughness and to robustly support the release of Green Belt land
122	Michael	Davies	Savills Landowners	Yes, as stated within the consultation document at paragraph 2.6, the purpose is omitted by many studies and would likely lead to the same result for each parcel. This would therefore likely lead to adding no value to the overall assessment.	Agreement noted
123	Michael	Burrows	Savills Landowners	Yes, as stated within the consultation document at paragraph 2.6, the purpose is omitted by many studies and would likely lead to the same result for each parcel. This would therefore likely lead to adding no value to the overall assessment.	Agreement noted
134	David	Barnes	Star Planning Richborough Estates	Agree there is no merit in assessing the GB against purpose 5. However disagree with some content of Table 2 and how purposes of GB will be considered - see Q2c.	Agreement noted
138	Charles	Robinson	Twelvetwentyone Landowners	No - totally contrary to the requirement to recycle PDL.	Disagreement noted. As part of the supporting evidence base for this Plan Review, officers would need to re-assess land availability within the District's urban areas, including PDL, prior to quantifying Green Belt release for thoroughness and to robustly support the release of Green Belt land.
152	Sue	Skidmore		The GB parcels should be assessed against Purpose 5 unless there is a robust stated proposal for brown site development.	PDL within Green Belt parcels will be noted during the Part 1 parcel assessment and will be considered further through Part 2 of the Green Belt Assessment and site selection through the Plan Review.
153	Elizabeth	Mitchell	Mitchell Planning	Yes I agree as all parcels should perform the same.	Agreement noted
161	Ian	Macpherson		Yes.	Agreement noted
179	Neil	Gow	Burcot Garden Centre	No, given the amount of brownfield around Bromsgrove and Birmingham it seems senseless to assess genuine greenfield / green belt land and not pay attention to brownfield / green belt land in the first instance.	Disagreement noted. As part of the supporting evidence base for this Plan Review, officers would need to re-assess land availability within the District's urban areas, including PDL, prior to quantifying Green Belt release for thoroughness and to robustly support the release of Green Belt land.

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<b>2c. Do you agree with the settlements that have been identified under Purposes 1, 2 and 4 to consider in the Bromsgrove context? And specifically;</b> <ul style="list-style-type: none"> <li><b>Under Purpose 1, do you agree with including Rubery and Cofton Hackett as part of the “Large Built-up-area” of the Greater Birmingham conurbation?</b></li> <li><b>Under Purpose 2, do you agree with assessing all settlements excluded from the Green Belt in Bromsgrove in the context of preventing merging?</b></li> <li><b>Under Purpose 4, do you agree with the “Historic Towns” (c.f. settlements) identified in neighbouring authorities which lie close to the border with BDC?</b></li> </ul>					
1	Tammy	Williams	Alvechurch Parish Council	In principle yes agree to the settlements under Purposes 1, 2 and 4.	Comments noted.
1	Tammy	Williams	Alvechurch Parish Council	It is felt Hopwood should also be mentioned as it’s a strategic buffer to stem encroachment and sprawl from Birmingham CC.	As Hopwood is separated from the conurbation, it is not being included as part of the large built-up-area. The large built up areas are defined in this context as those which abut or form part of either Bromsgrove District or the large built up areas within neighbouring authorities. The Green Belt Purposes assessment will be looking at how well the parcels perform with regard to the parcels that surround Hopwood and its role in relation to Birmingham.
1	Tammy	Williams	Alvechurch Parish Council	Do not agree with Rubery and Cofton Hackett as part of the "Large-Built-up-area" as this is particularly discriminating	BDC acknowledge that Rubery and Cofton Hackett are settlements in their own right, but due to their close proximity with the large-built-up-area, where a distinction is difficult, they have been included as part of the large built-up-area.
1	Tammy	Williams	Alvechurch Parish Council	Agree with assessing all settlements excluded from the GB in the context of preventing merging. Again full account must be taken of relevant policies in adopted Neighbourhood Plans.	Comments noted
1	Tammy	Williams	Alvechurch Parish Council	Agree with the historic towns identified in neighbouring areas	Comments noted
2	Gill	Lungley	Barnt Green Parish Council	Yes - agreed	Comments noted
2	Gill	Lungley	Barnt Green Parish Council	Agree with including Rubery and Cofton Hackett as part of the Large Built-up area	Comments noted
2	Gill	Lungley	Barnt Green Parish Council	Agree with assessing all settlements excluded from the Green Belt in Bromsgrove in the context of preventing merging	Comments noted
2	Gill	Lungley	Barnt Green Parish Council	Agree with historic towns in purpose 4, but would add that the hard constraints in the Site Selection Methodology should be included and a statement added that areas immediately adjacent to such sites should be subject to soft constraint	Agreement noted. The Site Selection Methodology is a separate piece of work which will be conducted independently of the Green Belt Review. It is acknowledged that when determining site allocations the two studies will interrelate to determine the most appropriate locations for development. Ultimately, it will be the BDP Review which will propose development sites, being informed by the full evidence base.
9	Alexandra	Burke	Hagley Parish Council	Agree and welcome approach. The question will be what encroachment is and is not acceptable.	No encroachment is acceptable. Planned development is not considered encroachment.
28	Emily	Barker	Worcestershire County Council	Yes.	Comments noted
35	Peter	King	Campaign to Protect Rural England	Agree: large urban areas are towns etc. in West Midlands.	Comments noted
35	Peter	King	Campaign to Protect Rural England	It probably matters little whether Cofton Hackett and Rubery are treated as 'towns' or extensions of Birmingham but it may be simpler to treat them as towns that have already merged with the conurbation.	BDC acknowledge that Rubery and Cofton Hackett are settlements in their own right, but due to their close proximity with the large-built-up-area, where a distinction is difficult; they have been included as part of the large built-up-area and therefore listed under Purpose 1.
43	Mark	Sitch	Barton Willmore The Church Commissioners for England	Settlements identified in purposes 1, 2 and 4 are supported. Given that the District Plan Review will be required to accommodate unmet need arising from the WMHMA, it is critical that the urban edge is suitably considered as part of the GB review.	Comments noted
48	Grace	Allen	CBRE Arden Park Properties	Agree Rubery and Cofton Hackett are connected to Birmingham and therefore part of the Greater Birmingham conurbation.	Comments noted
48	Grace	Allen	CBRE Arden Park	Agree with assessing all settlements excluded from the GB in Bromsgrove in the context of preventing merging. National Policy does not specify whether	Comments noted

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			Properties	the towns subject to merging should be within the GB or not. It is the role of the GB to prevent neighbouring towns from merging into one another regardless of whether it is a GB town or not.	
48	Grace	Allen	CBRE Arden Park Properties	Yes agree with the Historic Towns identified in neighbouring authorities which lie close to the border with BDC. However, it should be noted that those towns with a 'Historic Core' may not necessarily be preserved and enhanced by the GB depending on the location to the core and the extent of surrounding development.	Comments noted. BDC recognise that there are settlements with historic cores, many of which are covered by conservation areas. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
51	Gemma	Jenkinson	Claremont Planning Spitfire Bespoke Homes	Inclusion of Cofton Hackett and Rubery within the larger built up area of Birmingham is supported. However, the consideration of heritage issues through Purpose 4 requires further clarification as it does not make it clear whether every settlement with heritage considerations will be classified as being worthy of Historic Town considerations. Barnt Green has a Conservation Area, but the presence of this heritage asset shouldn't automatically require its consideration as a historic town, Any future development at any location would need to be sympathetic to any heritage assets and as such shouldn't be factored into a GB Purpose Assessment.	Comments noted. BDC recognise that there are settlements with historic cores, many of which are covered by conservation areas. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
52	Tom	Ryan	Claremont Planning Bellway Homes	Purpose 4 - requires further clarification as it is not clear whether every settlement with heritage considerations will be classified as being worthy of historic town considerations. Inappropriate for BDC to incorporate numerous settlements simply because they have a conservation area covering a small historic core. Future development would need to be sympathetic to heritage assets but these factors should not be factored into a GB purpose assessment.	Comments noted. BDC recognise that there are settlements with historic cores, many of which are covered by conservation areas. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	The inclusion of Cofton Hackett and Rubery within the larger built up area of Birmingham is supported and considered to be a logical representation of the inter-relationship between these settlements and the Birmingham conurbation.	Comments noted
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	The consideration of heritage issues through Purpose 4 requires further clarification as it does not make it clear whether every settlement with heritage considerations will be classified as being worthy of Historic Town considerations. The PAS Guidance suggests that very few towns will fall within this category and therefore it is inappropriate for Bromsgrove to incorporate numerous settlements within this subject area, especially as it may simply be because they have a Conservation Areas covering small historic cores. Barnt Green has a Conservation Area, for example, but the presence of this heritage asset should not automatically require its consideration as a 'Historic Town'. Any future development at any location would need to be sympathetic to any heritage assets and as such these should not be factored into a Green Belt Purpose Assessment.	Comments noted. BDC recognise that there are settlements with historic cores, many of which are covered by conservation areas. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
54	Katherine	Else	Claremont Planning Miller Homes	Agree with the settlements referred to and identified under the above purposes with the exception of Purpose 4. Inappropriate for Bromsgrove to incorporate this criterion to all settlements simply because they have Conservation Areas and historic cores. The consideration of heritage issues through Purpose 4 requires further clarification as it doesn't make it clear whether every settlements with heritage considerations will be classified as being worthy of Historic Town Considerations.	Comments noted. BDC recognise that there are settlements with historic cores, many of which are covered by conservation areas. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
63	Fiona	Lee-McQueen	Framptons Bellway Homes	In respect of Purpose 2 it is important to state that the Wythall settlement is defined as a neighbouring town "Wythall (inc. Hollywood/Drakes Cross and Major's Green)". Therefore, development in the area of within Wythall would not contribute to any coalescence when viewed in the context that	Part 1 of the Strategic Assessment of the Green Belt to assess how it performs against the purposes at a certain point in time. BDC cannot say at this stage whether development on certain sites would or would not contribute to coalescence. It would be a matter for Part 2 of the Green Belt Assessment to consider potential

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				the main purpose of the West Midlands Green Belt in this general area, which must be to avoid the coalescence of the Birmingham conurbation with settlements (including Wythall) to the south. Clearly, development on this site would not contribute to any coalescence in this respect.	development sites against the purposes of the Green Belt.
64	Peter	Frampton	Framptons Mr I Rowledge	Agreed.	Comments noted
65	Louise	Steele	Framptons Summix Ltd	With regard to purpose 4, it is noted that a broad interpretation of 'historic towns' is being taken into consideration, to include settlements with a designated conservation area. The appropriateness of this approach would need to be reviewed on a case by case basis as the presence or otherwise of a conservation area does not constitute an historic town in Green Belt terms, and there are likely to be very few settlements within Bromsgrove District that would be considered an historic town for the purposes of Green Belt assessment.  A plan indicating conservation area boundaries would aid in understanding the context of the areas in question. However, the assessment of individual heritage designations is not a Green Belt matter.	Comments noted. BDC recognise that there are settlements with historic cores, many of which are covered by conservation areas. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
76	Emily	Vyse	GVA University of Birmingham	Yes, we are satisfied that the correct settlements have been identified under these purposes.	Comments noted
77	John	Pearce	Harris Lamb Barberry & IM Land	Have no specific comments on the settlements that have been included within Purposes 1, 2 and 4.	Comments noted
78	Sean	Rooney	Harris Lamb Barratt Homes	Yes, considered a logical approach. Regarding Purpose 2, assessing all settlements excluded from the GB in the context of preventing merging is not considered a preferable approach. Issues regarding merging can be addressed through the assessment of each of the defined parcels.	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.
80	John	Pearce	Harris Lamb Bloor Homes	In relation to purpose 2, which states that the purpose of it is to prevent neighbouring towns from merging, Guidance at paragraph 134 of the NPPF is clear that this purpose of the GB is to stop neighbouring towns from merging together. It does not state that GB should prevent the merging together of villages or other small settlements that are not towns. As such, within this part of the assessment, only Bromsgrove town should be assessed against other towns, all of which are located outside of the District i.e. Birmingham, Solihull, Halesowen, Stourbridge, Kidderminster and Redditch.	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.
82	Sean	Rooney	Harris Lamb Stoke Prior Developments	Regarding Purpose 2, assessing all settlements excluded from the GB in this context is not considered to be the preferable approach. Land not within the GB should not form part of the review as this should be proactively concentrating on finding suitable sites to address housing shortfall. Issues regarding merging can be addressed through the assessment of each of the defined parcels.	The Green Belt Review is not assessing the settlements per se but has listed these settlements as it is the role of the Green Belt surrounding them to prevent them from merging. It is not the purpose of the Green Belt Assessment to find sites for housing. The purpose of the Green Belt Assessment is to consider how the Bromsgrove Green Belt functions against the purposes. It will be the BDP Review which will propose sites for development, informed by the full evidence base, including the Site Selection work. BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.
86	Rebecca	Anderson	Iceni Projects Generator	We do not consider it is beneficial to assess the impact on separation of all settlements in Bromsgrove in the same way. The separation between	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt

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			Developments	smaller settlements, such as Lickey End, should not be treated in the same way as the biggest settlements which the GB was originally meant to protect such as Birmingham, Redditch and Bromsgrove. Greater weight should be placed on the impact of the separation of these types of settlements, rather than the smaller ones.	Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.
88	Abbie	Connelly	Lichfields Taylor Wimpey Strategic Land	Council hasn't justified its definition of large built up areas and notes that the assessment of the settlements should fit in with the Council's spatial strategy.	Comments noted. A definition of 'large built up area' is included in Table 2 of the Methodology.
98	Sally	Oldaker		Sort of agree with including Cofton Hackett as part of the 'Large Built-up-area' of Greater Birmingham conurbation - a lot of Cofton is not built-up, only the new bit.	For clarity, reference to Cofton Hackett is to the urban area, not to the Parish as a whole.
98	Sally	Oldaker		Yes agree with the 'Historic Towns' identified in neighbouring authorities which lie close to the border.	Comments noted
98	Sally	Oldaker		Yes agree with assessing all settlements excluded from the GB in Bromsgrove in the context of preventing merging.	Comments noted
99	Mark	Dauncy	Pegasus Gallagher Estates	<p>Considered sensible to include Rubery &amp; Cofton Hackett as these settlements read as an integral part of the South Western edge of the conurbation. Disagree with the approach of that all settlements excluded from the Green belt along with all settlements of a similar size close to the District Boundary are to be defined as towns. Towns and Villages are clearly treated differently within the Local Plan's settlement hierarchy and generally distinguished separately in national and local planning policy terms. The primary objective is to assess the implications of merging towns rather than other smaller settlements that may exist in the Green belt.</p> <p>Bromsgrove Town is the only historic town that should be assessed in the context of NPPF para 134, part d)."</p>	<p>BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or washed over settlements.</p> <p>It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.</p>
107	John	Jowitt	PJ Planning Bromsgrove Golf Course	Yes	Comments noted
114	Charles	Robinson	Rickett Architects Cawdor	Some measure of merging will be necessary to secure sustainable development. Proposed assessment criteria are based upon negative factors rather than a positive assessment of whether a proper strategic assessment of the Green Belt on a regional basis will enable a positive approach to development.	The focus of the assessment criteria is based around the purposes of the Green Belt set out in the NPPF. The assessment considerations will focus on positive and negative factors. A satisfactory strategic assessment of the Green Belt on a regional basis would not result in a detailed review of the Green Belt in BDC.
117	Darren	Oakley	RPS Group Messrs Wild, Johnson, McIntyre & Fisher	2c - 2f: This would appear to be merely a high level assessment that would provide a position statement on each parcel at a point in time. Given that no analysis will be presented on the appropriateness of the boundaries, again question the usefulness of this part.	This statement is correct. The purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt some 40+ years ago, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity for a baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. BDC feel it is a valuable exercise to identify how the Green Belt has performed in its role up to this point in time.
122	Michael	Davies	Savills Landowners	In reference to purpose 2 we agree that all settlements excluded from the Green Belt should be assessed in the context of merging. This is because a key consideration when determining the suitability of Green Belt to be released should be its impact on the likelihood of settlements merging.	Support is noted
123	Michael	Burrows	Savills Landowners	A key consideration when determining the suitability of Green Belt to be released is the prevention of neighbouring towns from merging. We recognise that the District is made up of a series of distinct settlements, some of which (notably the larger settlements) have been excluded from the	Support is noted

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				Green Belt. Therefore in the context of Bromsgrove District it seems appropriate to focus on seeking to avoid having the distinct settlements that have been excluded from the Green Belt merging rather than debating the definition of 'town'. Therefore, in reference to purpose 2 we agree that all settlements excluded from the Green Belt should be assessed in the context of merging."	
126	Rachel	Best	Stansgate Planning Access Homes LLP	Purpose 2 should include all urban areas such as smaller villages and the urban edge of the Greater Birmingham conurbation rather than only settlements excluded from the GB or those within the dictionary definition of a town. Relying on a dictionary definition of 'town' as the assessment proposes is too literal an interpretation.	Comments noted. This is the approach that has been taken in the Green Belt Methodology.
126	Rachel	Best	Stansgate Planning Access Homes LLP	As defined in the assessment, Purposes 2 and 4 are in conflict with each other and a consistent interpretation is needed. Purpose 4 is 'to preserve the setting and special character of historic towns' but having identified 'towns' in Purpose 2 it appears to abandon 'town' and for no justified reason says it takes a wider view and applies to all settlements with a Conservation Area.	It is not considered that purpose 2 and 4 contradict each other. They intend to achieve two different things. Purpose 2 and 4 do take a wider approach that simply 'town' and considers settlements; the purpose of this is to ensure the assessment has a local relevance. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
126	Rachel	Best	Stansgate Planning Access Homes LLP	As proposed, Purpose 2 of the Assessment will apply only to settlements excluded from the GB but this is an incorrect approach as whether a settlement is excluded is a separate matter to the role of preventing town merging. NPPF para 140 advises when 'villages' should be included or excluded from GB and the difference relates to the reason why its character needs to be protected. It follows that in applying Purpose 2 it makes no difference if a settlements is washed over or not as it is about merging rather than protecting character.	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements. None washed over settlements have been included as the Green Belt surrounding them will be assessed with regard to its role in preventing merging.
127	Rachel	Best	Stansgate Planning AE Becketts and Sons Ltd	Purpose 2 should include all urban areas rather than only settlements excluded from the Green Belt. Purposes 2 and 4 are in conflict with each other, consistent interpretation is needed. As proposed the Assessment will apply only to settlements excluded from GB but this is an incorrect approach as whether or not a settlement is excluded is a separate matter to the role of preventing towns merging. In applying Purpose 2 it makes no difference if a settlement is washed over or not as It is about merging rather than protecting character. Relying on a dictionary definition of ""town"" as the assessment is too literal an interpretation. Purpose 4 is ""to preserve the setting and special character of historic towns"" but having identified towns in purpose 2 it appears to abandon town and says it takes a wider view and applies to all settlements with a Conservation Area. This means settlements such as Clent and Romsley should be included to the list."	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements. With regard to purpose 4, It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
128	Rachel	Best	Stansgate Planning J Rigg Construction Ltd	<p>Purpose 2 - should include all urban areas such as smaller villages and urban edge of the conurbation rather than only those excluded from GB or within the definition of town. Purposes 2 and 4 are in conflict with each other and consistent interpretation is needed. In applying Purpose 2 it makes no difference if settlement is washed over or not as it is about merging rather than protecting character.</p> <p>Purpose 4 - having identified 'towns' in Purpose 2, the methodology abandons town and for no justified reason takes a wider view and applies to all settlements with a conservation area. Purpose 2 should apply to all built up areas and same settlements should be applied to Purpose 4. Settlements such as Clent and Romsley should be included in these lists.</p>	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements. With regard to purpose 4, It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.



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129	Rachel	Best	Stansgate Planning Midlands Freeholds Ltd	<p>Purpose 2 should include all urban areas such as smaller villages and the urban edge of the Greater Birmingham conurbation rather than only settlements excluded from Green Belt or those within the dictionary definition of a town. Purposes 2 and 4 are in conflict with each other and a consistent interpretation is needed. Purpose 2 should be based on any area of built development be it a town, village or the edge of the conurbation. Purpose 2 'to prevent neighbouring towns merging into one another' is about containing development and maintaining gaps between built areas to avoid coalescence so the application of Purpose 2 makes no difference whether a settlement is washed over or excluded from Green Belt. As proposed, the Assessment will apply only to settlements excluded from Green Belt but this is an incorrect approach as whether or not a settlement is excluded is a separate matter to the role of preventing towns merging. NPPF para 140 advises when 'villages' should be included or excluded from Green Belt and the difference relates to the reason why its character needs to be protected. It follows that in applying Purpose 2 it makes no difference if a settlement is washed over or not as it is about merging rather than protecting character.</p> <p>Furthermore, relying on a dictionary definition of 'town' as the assessment proposes is too literal an interpretation.</p> <p>Purpose 4, as proposed conflicts with purpose 2. Purpose 4 is 'to preserve the setting and special character of historic towns' but having identified 'towns' in purpose 2 it appears to abandon 'town' and for no justified reason says it takes a wider view and applies to all settlements with a Conservation Area. Purpose 2 should apply to all built up areas regardless of whether they are excluded from Green Belt and the same settlements should be applied to purpose 4. This means settlements such as Clent and Romsley should be included to the list.</p>	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements. . With regard to Purpose 4, It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
130	Rachel	Best	Stansgate Planning Mr and Mrs J Mondon Lines	<p>Purpose 2 should include all urban areas such as smaller villages and the urban edge of the Greater Birmingham conurbation rather than only settlements excluded from GB or those within the dictionary definition of a town. Purpose 2 should apply to all built up areas regardless of whether they are excluded from the GB and the same settlements should be applied to Purpose 4.</p>	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.
130	Rachel	Best	Stansgate Planning Mr and Mrs J Mondon Lines	<p>Purpose 4, as proposed conflicts with Purpose 2. Purpose 4 is 'to preserve the setting and special character of historic towns' but having identified 'towns' in purpose 2 it appears to abandon 'town' and for no justified reason says it takes a wider view and applies to all settlements with a Conservation Area.</p>	It is not considered that purpose 2 and 4 contradict each other. They intend to achieve two different things. Purpose 2 and 4 do take a wider approach that simply 'town' and considers settlements; the purpose of this is to ensure the assessment has a local relevance. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
131	Rachel	Best	Stansgate Planning Consultants Ltd Mr N Meredith	<p>Purpose 2 should include all urban areas such as smaller villages and the urban edge of the Greater Birmingham conurbation rather than only settlements excluded from Green belt or those within the dictionary definition of a town. Purposes 2 and 4 are in conflict with each other and a consistent interpretation is needed. As proposed the assessment will only apply to settlements excluded from Green Belt but this is an incorrect approach as whether or not a settlement is excluded is a separate matter to the role of preventing towns merging. In applying purpose 2 it makes no</p>	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.

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				<p>difference if a settlement is washed over or not as it is about merging rather than protecting character. Relying on a dictionary definition of town as the assessment proposes is too literal an interpretation. Purpose 2 should apply to all built up areas regardless of whether they are excluded from Green belt and the same settlements should be applied to Purpose 4. This means settlements such as Clent and Romsley should be included in the list.</p>	
132	Rachel	Best	Stansgate Planning Mrs L Bastable	<p>Purpose 2 should include all urban areas such as smaller villages and the urban edge of the Greater Birmingham conurbation rather than only settlements excluded from GB or those within the dictionary definition of a town. Purpose 2 should apply to all built up areas regardless of whether they are excluded from the GB and the same settlements should be applied to Purpose 4.</p>	<p>BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.</p>
132	Rachel	Best	Stansgate Planning Mrs L Bastable	<p>Purpose 4, as proposed conflicts with Purpose 2. Purpose 4 is 'to preserve the setting and special character of historic towns' but having identified 'towns' in purpose 2 it appears to abandon 'town' and for no justified reason says it takes a wider view and applies to all settlements with a Conservation Area.</p>	<p>It is not considered that purpose 2 and 4 contradict each other. They intend to achieve two different things. Purpose 2 and 4 do take a wider approach that simply 'town' and considers settlements; the purpose of this is to ensure the assessment has a local relevance. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.</p>
133	Rachel	Best	Stansgate Planning Mr C Detloff	<p>Purpose 2 should include all urban areas rather than only settlements excluded from the Green Belt. Purposes 2 and 4 are in conflict with each other, consistent interpretation is needed.</p> <p>As proposed the Assessment will apply only to settlements excluded from GB but this is an incorrect approach as whether or not a settlement is excluded is a separate matter to the role of preventing towns merging. In applying Purpose 2 it makes no difference if a settlement is washed over or not as it is about merging rather than protecting character. Relying on a dictionary definition of ""town"" as the assessment is too literal an interpretation.</p> <p>Purpose 4 is ""to preserve the setting and special character of historic towns"" but having identified towns in purpose 2 it appears to abandon town and says it takes a wider view and applies to all settlements with a Conservation Area. This means settlements such as Clent and Romsley should be included to the list.</p>	<p>It is not considered that purpose 2 and 4 contradict each other. They intend to achieve two different things. Purpose 2 and 4 do take a wider approach that simply 'town' and considers settlements; the purpose of this is to ensure the assessment has a local relevance. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.</p> <p>BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.</p>
134	David	Barnes	Star Planning Richborough Estates	<p>Purpose 1 - with regard to checking unrestricted urban sprawl, if a rational and planned approach is adapted to the identification of land to be released around the conurbation then this is not regarded as unrestricted.</p> <p>Purpose 2 - the purpose is not stated to be all settlements, including large villages excluded from the GB, from merging. Therefore the approach being advocated is inconsistent with national policy and should be focused solely on towns which would include Bromsgrove and Redditch, the conurbation and Kidderminster. Table 3 should not include the large villages excluded from the GB.</p> <p>Purpose 4 - the NPPF refers to historic towns not settlements. Just because a settlement contains a conservation area does not give it status of places such as Bath, York, Oxford, Chester and Cambridge which have a special historic character and is a fundamental reason why GBs around these towns were defined. Issues related to conservation areas are matter for site selection therefore an assessment against this purpose is unnecessary as</p>	<p>It is agreed that a planned approach to development would not be considered as urban sprawl.</p> <p>BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.</p> <p>It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.</p>

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				there are no historic towns within or adjoining the District."	
138	Charles	Robinson	Twelvetwentyone Landowners	Some level of merging will be necessary to secure sustainable development. Proposed assessment criteria based upon negative factors rather than positive assessment of the GB on a regional basis.	The focus of the assessment criteria is based around the purposes of the Green Belt set out in the NPPF. The assessment considerations will focus on positive and negative factors each parcel through the site selection process. A satisfactory strategic assessment of the Green Belt on a regional basis would not result in a detailed review of the Green Belt in BDC.
153	Elizabeth	Mitchell	Mitchell Planning	Purpose 2 - it does not seem correct to consider all the settlements listed as towns. Some listed are not freestanding towns and there may be merit in allowing coalescence in limited circumstances between closely located smaller settlements. Taking GB policy to prevent the joining of small settlements seems a step too far.	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.
185	Paul	Frost		Yes.	Comments noted
<b>2d. Do you agree with the Assessment Criteria set out under each purpose?</b>					
31	Rachel	Jones	Better Environment Theme Group	The Assessment Criteria lacks any clarity or importance of biodiversity - which is referenced in the SSM and I&O documents. This potentially suggests that current strategies are not going to be reviewed.	Comments noted. Biodiversity will be considered along with other relevant factors in the preparation of other evidence base documents. The Green Belt Assessment will purely focus on Green Belt considerations. Biodiversity is an important consideration but not appropriate for the Green Belt Assessment.
35	Peter	King	CPRE	The retention of gaps between settlements (to prevent coalescence) is particularly important and a high weight should be given to that factor.	Preventing the coalescence between settlements is acknowledged as one of the purposes of the Green Belt and this will be considered as part of the Green Belt purposes Assessment. There will not be weightings afforded to the purposes.
1	Tammy	Williams	Alvechurch Parish Council	Yes.	Agreement noted.
11	Rosamund	Worrell	Historic England	The approach to assessment methodology is welcomed, in particular the inclusion of conservation areas under the 'historic towns' element.	Agreement noted.
52	Tom	Ryan	Claremont Planning OBO Bellway Homes	Agree with the assessment criteria, particularly recognition of factors that weaken the strength of purpose of certain GB areas such as ribbon development, sites on urban fringe and where there is existing evidence of encroachment.	Agreement noted.
28	Emily	Barker	Worcestershire County Council	Yes, could add " <i>will development add value to the lives of residents and be sustainable and have access to appropriate infrastructure if the area of land is built out.</i> "  Particularly welcome consideration of the setting of historic towns. The assessment methodology needs to include consideration of the historic environment holistically. The review should not only consider the presence/absence of individual designated/undesignated heritage.	The sentence suggested does not relate to the purposes of the Green Belt and is not considered appropriate for the methodology. Considerations such as infrastructure will be more appropriate further along in the allocation process.  Other points are noted about the consideration of the Historic Environment. It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
161	Ian	Macpherson		Yes, but purpose 3 where location on an urban fringe should not lessen a parcel's strength.	Agreed to remove sentence "If urban fringe, the parcel's strength will be lessened"
112	Gareth	Sibley	RCA Regeneration OBH Piper Group	Agree with this approach.	Agreement noted.
77	John	Pearce	Harris Lamb OBH Barberry & IM	Considered that the Assessment Considerations detailed in Table 3 are not complete. Refers to recent case law (C1/2017/0829) which provided clarity on importance of considering views when assessing the effects of potential development upon the Green Belt. Necessity to consider the visibility of development when assessing the effect on the Green belt. The definition of 'openness' should be amended to say 'perception of openness' in purpose 1. Similarly purpose 2 references "sense of openness" as above should account for the visual influence. Assessment considerations in purpose 3 references, the 'Rural sense of the area'. Any assessment on the countryside characteristics where the character of the landscape requires analysis of the	Part 2 of the Green Belt Review will consider the effects of potential development upon the Green Belt. For clarity 'openness' in the context of Purpose 1 and 2 relates the absence of built development or other urbanising elements. The 'sense of openness' will be considered in Part 2 in relation to other landscape elements.  There will be a robust evidence base which will include an analysis of the Landscape character of the area, including a full contribution of the Landscape Character Assessment through the District Plan Review process.

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				Worcestershire Landscape Character assessment and this assessment should be incorporated into the methodology. Whether a parcel is urban fringe should also include the influence of urban elements in views towards and from the parcel of land.	
51	Gemma	Jenkinson	Claremont Planning OBO Spitfire Homes	Agree with the assessment criteria.	Agreement noted.
63	Fiona	Lee-McQueen	Framptons OBH Bellway Homes	The document is unclear as it does not specifically identify what the criteria are. Reference is only made to 'considerations', therefore further clarification is required	The term considerations have been used in place of criteria and therefore the considerations listed in that column will be what need to be considered when conducting the Green Belt Review.
53	Gemma	Jackson	Claremont Planning OBO McTaggart & Mickel Group	Agree with the assessment criteria, particularly the proposed recognition of factors that weaken the strength of the purpose of certain areas within the Green Belt such as ribbon development, sites located on the urban fringe and where there is existing evidence of encroachment.	Agreement noted.
76	Emily	Vyse	GVA OBO University of Birmingham	<p>Purpose 1 is to check the 'unrestricted' sprawl of large built up areas. If development within a particular parcel of land would be limited / controlled, for example by a logical and defensible boundary, then this would not constitute 'unrestricted' sprawl and such a parcel of land could legitimately be classed as making either no contribution or a limited / weak contribution in respect of Purpose 1. What is critical therefore is not how strong the existing Green Belt boundary is but whether the parcel under consideration contains other defensible boundaries that could reasonably be used to limit the extent of sprawl possible. This appears to be acknowledged in the suggested assessment considerations but this doesn't then follow through into the strength of contribution criteria which appear to be more concerned with the strength of the existing boundary and whether sprawl has already occurred.</p> <p>Purpose 3 - the Council should consider defining what it intends to class as 'urban features affecting openness' and should utilise consistent language when defining its 'weak' and 'moderate' criteria (e.g. if an urban feature has an impact on openness that will be, by definition, harmful (i.e. negative) yet the Council's definition of 'moderate' appears to suggest that this might not be the case.</p>	<p>Part 1 of the Green Belt Review considers the Green Belt in its current state. Part 1 is to assess the performance of the Green Belt as it is on a given day as a 'snapshot in time' which is expressed as best practice by PAS guidance. Part 2 will consider potential development sites and how they function against the purposes of the Green Belt. It will be at this stage that defensible boundaries that could reasonably be used to limit the extent of sprawl possible will be assessed. Detail on defensible boundaries and site specific features will be identified at Part 2 of the Green Belt Purposes Assessment and through the site selection process.</p> <p>The urban features that affect openness are detailed in the assessment considerations column. Text has been included which states that "evidence of existing encroachment e.g. urban feature such as street lights, extensive pavements, floodlights or areas of hard standing. The intention of the table is all of the columns to come to a view on how the parcel of Green Belt in question functions against that purpose. It is not appropriate to use consistent language when by virtue of the table they are required to be different to be able to distinguish between the categories from 'no contribution' through to 'strong contribution'. It is the difference in the subtleties which will allow the distinction to be made between the values of the Green Belt parcels.</p>
90.	Owen	Jones	LRM Planning OBO Persimmon Homes	The assessment criteria in Table 3 are unobjectionable. But where the strategic parcels identified are of significant size, for example S2, there will be parts or areas within the parcel that perform differently to other parts or areas within the same parcel. It will be important that these distinctions can be drawn upon.	Comments noted. It is accepted that a Green Belt parcel will vary in character and therefore how it performs against the Green Belt purposes. Part 1 of the Study will initially be assessing how the Green Belt performs against the defined Green Belt purposes. Part 2 of the process will go into more site specific information and detail of individual parts of the parcel.
113	Gareth	Sibley	RCA Regeneration OBO CAD Square	Agree with this approach.	Agreement noted.
107	John	Jowitt	PJ Planning OBO Bromsgrove Golf Course	Yes.	Agreement noted.
122	Michael	Davies	Savills OBO Landowners	In a broad sense we agree with the assessment criteria set out for the Green Belt purposes. We highlight that the assessment considerations should be tightened up to ensure that they are specific to the Green Belt purpose in question. At present they appear to be too broad. For example, reference is made to: "The sense of openness" in reference to purpose 1 without defining what this means.	Comments noted, the assessment criteria will be considered again it identify if further detail can be included.
65	Louise	Steele	Framptons OBO	It is not considered that the assessment criteria as described Table 3 are	Comments noted, the assessment criteria will be considered again it identify if

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			Summix Ltd	sufficiently precise or detailed to result in a consistent appraisal of parcels. More detailed descriptions of the factors that are to be considered under each purpose would need to be developed to set the judgement of officers within defined parameters. These parameters should be made available for comment prior to commencing the assessment.	further detail can be included.
83	Patrick	Downes	Harris Lamb OBO Willowbrook garden Centre	In general agreement with the suggested assessment criteria. However, specifically object to the inclusion of 'Catshill' as a town in Table 3. The NPPF is clear that this issue relates to the separation of 'towns' not 'settlements' and it is inappropriate to use this as a factor when considering the Green belt role of individual parcels.	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.
153	Elizabeth	Mitchell	Mitchell Planning	Council's view on historic towns assessment criteria (Table 2) is strongly objected to as it may add a further unnecessary constraint on sustainable development. The setting of listed buildings is a statutory consideration in planning decisions. Setting of a conservation area is not a statutory requirement but is covered by development plan policy.	It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
123	Michael	Burrows	Savills OBO	In a broad sense we agree that the assessment criteria set out under each of the Green Belt purposes appear to be logical. However we wish to highlight that it would be helpful if the assessment considerations are more specifically defined in the context of the purpose that they relate to, e.g. reference is made to: "The sense of openness" for purpose 1 without providing further explanation as to what this means.	Comments noted, the assessment criteria will be considered again it identify if further detail can be included.
115	John	Breese	Rosconn Strategic Land	Purpose 3: The assessment criteria for the strength of contribution set out under purpose 3 should be more explicit when considering the influence of urban fringe and the influence of urbanising features or boundaries. The Planning Advisory Service provides guidance in relation to Green Belt Assessments when considering purpose 3 stating: <i>"Presumably all Green Belt does this, making the purpose difficult to use to distinguish the contribution of different areas. The most useful approach is to look at the difference between urban fringe – land under the influence of the urban area - and open countryside, and to favour the latter in determining which land to try and keep open, taking into account the types of edges and boundaries that can be achieved."</i>	Comments noted. The use of the term 'urban fridge' will be reconsidered.
110	Gareth	Sibley	RCA Regeneration OBO Duchey Homes	Agreed.	Agreement noted.
2	Gill	Lungley	Barnt Green Parish Council	Agree.	Agreement noted.
99	Mark	Dauncey	Pegasus OBO Gallagher Estates	Assessment Criteria relating to the merging of towns should be amended and all villages should be removed. Dickens Heath has been included but as a village should be excluded from the "in neighbouring local authorities column.	BDC recognise the District is comprised of a number of distinct settlements, some of which have been excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current extent rather than the narrow view of 'towns' or including all washed over settlements.
48	Grace	Allen	CBRE OBO Arden Park Properties	Agreed.	Agreement noted.
84	Patrick	Downes	Harris Lamb OBO Worcestershire NHS Trust	Agreed.	Agreement noted.
185	Paul	Frost		Agreed	Agreement noted
80	John	Pearce	Hariss Lamb OBH Bloor Homes	Agreed	Agreement noted
125	Alastair	Thornton	Simply Planning	Each parcel should be assessed individually against each of the 5 GB purpose	Comments noted. Each parcel will be assessed under the purposes of the Green

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			OBO Woodpecker PLC	tests in order to ensure a robust approach to the assessment. There should be no cap/limit on the amount of GB that should be released where the 5 tests aren't met	Belt. Supporting evidence for the Plan Review will identify the amount of Green Belt that should be released.
88	Abbie	Connelly	Lichfields OBO Taylor Wimpey	Concerned that the Assessment Criteria doesn't adequately distinguish between varying parcel sizes. Recommend that the Assessment Criteria should consider the presence of key routes and road networks located within the Green Belt that could accommodate sustainable development. Concerned that "sense of openness" is stated within the assessment criteria for Purposes 1 and 2. Creates a risk of too much weight being applied to particular factors, leading to production of unreliable scores.	<p>Comments noted. It is agreed that the parcels presented are large, however due to the nature of Part 1 of the Green Belt Assessment it is necessary they are of this size. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes. It is accepted that the character of the land will vary throughout the parcel this will be taken into account. This will be considered more specifically in relation to Part 2 of the assessment.</p> <p>With regard to key routes and networks, this will be considered during the Site Selection process and this is not a relevant consideration for the Green Belt Assessment.</p> <p>It is acknowledged that the sense of openness is detailed under Purpose 1 and 2. The fundamental purpose of the Green Belt is to prevent urban sprawl by keeping land permanently open. With regard to these two purposes this sense of openness is particularly relevant and therefore required under these two purposes. The phrasing will be reconsidered to identify if further clarity can be included.</p>
86	Rebecca	Anderson	Iceni Projects Obo Generator Developments	We consider that the decision to consider Bromsgrove a 'historic town' for the purposes of the GB study is inaccurate. The Conservation Area is in the centre of the town and the GB some distance from this. The use of these criteria will not deliver fair assessment of the impact on the GB from development.	It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
98	Sally	Oldaker		I don't agree with Purpose 3 - 'it is urban fringe' - being seen as a negative. Just because there has already been urban encroachment should not give carte blanche for more?	Comments noted. The use of the term 'urban fridge' will be reconsidered.
111	Gareth	Sibley	RCA OBO Mr & Mrs Watson	Agreed	Agreement noted
78	Sean	Rooney	Harris Lamb OBH Barrett Homes	Agreed	Agreement noted
54	Katherine	Else	Claremont Planning OBO Miller Homes	Agree with the assessment criteria. The site at Brockhill West is evidently located on the urban fringe and would result in a natural extension to the town of Redditch.	Agreement noted. Specific sites will be considered during Part 2 of the assessment.
114	Charles	Robinson	Rickett Architects OBO Cawdor	Some measure of merging will be necessary to secure sustainable development. Proposed assessment criteria are based upon negative factors rather than a positive assessment of whether a proper strategic assessment of the Green Belt on a regional basis will enable a positive approach to development.	<p>The focus of the assessment criteria is based around the purposes of the Green Belt set out in the NPPF. The assessment considerations will focus on positive and negative factors each parcel through the site selection process.</p> <p>A satisfactory strategic assessment of the Green Belt on a regional basis would not result in a detailed review of the Green Belt in BDC.</p>
137	Matthew	Fox	Turley OBO Redrow Homes	In the Assessment Criteria for Strength of Contribution for Purpose 1 it is considered that it may be difficult to distinguish between 'moderate' and 'weak' in certain instances because of the references to defensible boundaries. For example, a Parcel which does not possess a defensible boundary, or it is deemed weak/partial, would point towards it being highly sensitive to unrestricted sprawl if released so it therefore makes an important contribution. To avoid any confusion we would suggest that the definitions are made clearer.	Comments noted. The criteria will be reconsidered to identify if further clarity can be included.
194	Darren	Oakley	RPS OBO Clients	We note the methodology to assessing the 60 identified parcels. This would appear to be merely a high-level assessment that would provide a position statement on each parcel/area at as a point in time. Given that no analysis	The purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt some 40+ years ago, no assessment against the Green Belt Purposes has

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				will be presented here on the appropriateness of boundaries (as stated in para 2.26) we again question the usefulness of this part in the overall GBPA evidence gathering exercise.	ever been undertaken. The Green Belt Assessment provides an opportunity to complete a baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.
1	Tammy	Williams	Alvechurch Parish Council	Yes	Comments noted.
2	Gill	Lungley	Barnt Green Parish Council	Yes - agree with the measures for assessing the strength of contribution.	Comments noted.
35	Peter	King	Campaign to Protect Rural England	The question will be what encroachment is (and is not) acceptable	Comment noted - proposed assessment criteria and the strength of contribution ratings are set out in Table 3 of the methodology for each of the Green Belt purposes to be assessed, including safeguarding the countryside from encroachment.
48	Grace	Allen	CBRE	Generally the measures appear reasonable for each purpose.	Comments noted.
51	Gemma	Jenkinson	Claremont Planning	The proposed measures are logical and sensible; however have concerns over the size of parcels being assessed.	Comment of support noted. The parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Further consultation has taken place on the issue of defining parcels through the posing of Q2a in the methodology document and the Council's responses to consultation representations on this issue are also shown under Q2a.
52	Tom	Ryan	Claremont Planning	Proposed measures for assessing strength of contribution are logical and sensible, however as referred to there is concern over size of parcels. Suitable sites should not be ruled out because of the characteristics of the wider parcel.	Comment noted - the parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
53	Gemma	Jackson	Claremont Planning	The proposed measures for assessing the strength of contribution a parcel makes to the Green Belt are logical and sensible. Concerns over the size of the parcels being assessed. Large predominantly rural parcels may make some positive contribution to the purpose of the Green Belt, yet sites located at the periphery of the parcel, immediately adjacent to existing built form are suitable for development and should not be ruled out because of the characteristics of the wider parcel.	Comment noted - the parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites out of consideration prior to the Part 2 process taking place.
54	Katherine	Else	Claremont Planning	Proposed measures are logical and sensible, however have concerns over the size of parcels being assessed	Comment of support noted. The parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Further consultation has taken place on the issue of defining parcels through the posing of Q2a in the methodology document and the Council's responses to consultation representations on this issue are also shown under Q2a.

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63	Fiona	Lee-McQueen	Framptons	The document is unclear as it does not specifically identify what the measures are, therefore further clarification is required.	Comment noted - Question 2e is based on the text set out in the fourth column of Table 3 in the methodology document under the heading 'Strength of Contribution'. The measures are therefore contained in the text which describes how the ratings of Strong - Moderate - Weak - No Contribution will be assigned based on the assessment of each parcel.
65	Louise	Steele	Framptons	The criteria and specific wording of measures for assessing the 'strength of contribution' for each Green Belt purpose are not consistent or precise enough to produce comparable results. Specifically, the terms identified to establish if a parcel makes a 'Strong' or 'Moderate' contribution are poorly defined. It is unclear for instance how terms such as 'largely free' verses 'mostly free' or 'most of a gap' verses 'majority of a gap' can be sufficiently differentiated to draw adequate conclusions between a parcel making a Strong or Moderate contribution to Green Belt.	Comment noted. It is not appropriate to use consistent language when by virtue of the table they are required to be different to be able to distinguish between the categories from 'no contribution' through to 'strong contribution'. It is the difference in the subtleties which will allow the distinction to be made between the values of the Green Belt parcels. BDC consider there is a differentiation between 'largely free' and 'mostly free', and also between 'most of a gap' and 'majority of a gap'.
65	Louise	Steele	Framptons	The criteria for assessment also seem to vary. For example, with regard to purpose 2, a parcel making a Strong contribution is one where a loss of openness would result in 'visual or physical merging or substantially reduce the gap'. However, a loss of openness is Moderate where it would 'physically or visually have a negative impact on the existing gap'. As both these scenarios describe a degree of loss of openness, it is unclear how 'severe' the negative impact would be before the parcel is considered to make a Strong contribution to purpose 2. Standardised, precise and defined terminology should be set out and consistently applied to each criterion so that judgements as to the level of contribution a parcel makes against each purpose can be easily followed and justified.	Comment noted - with reference to the specific example in this representation concerning the Strong and Moderate ratings for Purpose 2, BDC considers that the wording 'substantially reduce the gap' offers sufficient differentiation in the wording/terminology used for the assessment criteria to distinguish between a Strong and Moderate rating. It is the difference in the subtleties which will allow the distinction to be made between the values of the Green Belt parcels.
77	John	Pearce	Harris Lamb	Considered that the descriptions provided under the Strength of Contribution are not complete or consistent. Under Green Belt Purpose 1 a strongly performing parcel of land would not only be immediately adjacent to a large built up area, be free from development and have a strong defensible boundary, but there would also be little perception of built development available from publicly accessible viewpoints within and across the parcel. A weakly performing parcel might be largely free of built development but could be strongly influenced by adjoining built development such that any perception of openness is very limited.	Comment noted - BDC consider there is sufficient variation in criteria to distinguish between the four ratings for strength of contribution. It is the difference in the subtleties which will allow the distinction to be made between the values of the Green Belt parcels.
78	Sean	Rooney	Harris Lamb	In general agreement with the proposed measures. The NPPF doesn't place weight on any individual purpose and therefore if an area is found to contribute to any single purpose it may be considered sufficient to warrant its retention in the GB.	Comments noted.
80	John	Pearce	Harris Lamb	General agreement with the proposed measures.	Comments noted.
82	Sean	Rooney	Harris Lamb	We are in general agreement with the proposed measures for assessing the strength of contribution and provide an acceptable graduated scale to assess the relative contribution made.	Comments noted.
83	Patrick	Downes	Harris Lamb	Agreed.	Comments noted.
84	Patrick	Downes	Harris Lamb	In general agreement with the proposed measures	Comments noted.
88	Abbie	Connelly	Lichfields	Concerned there is a possibility of the scale of certain assessment parcels undermining the proposed assessment criteria. Highlights need to ensure that the assessment parcels are all of a consistent size. If this change isn't made, then the proposed measures for assessing the Strength of Contribution should be modified to ensure a consistent approach to the assessment.	The parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Further consultation has taken place on the issue of defining parcels through the posing of Q2a in the methodology document and the Council's responses to consultation representations on this issue are also shown under Q2a. It is accepted that the character may vary throughout the land parcel; this will be taken into account. Part 2 of the study will consider individual sites.



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98	Sally	Oldaker		I think the 'weak' one is open to interpretation.	Comment noted. BDC consider that the weak rating across all purposes to be assessed is essential as a means of bridging the gap between 'No Contribution' (where Green Belt designation does not serve a particular purpose whatsoever) and 'Moderate' (where Green Belt designation clearly serves a particular purpose, albeit not as strongly as it could).
99	Mark	Dauncy	Pegasus	Generally agree, where relevant they should refer to towns rather than villages to be consistent with Para 134 of the NPPF. Affording equal weight to the five purposes is considered essential and the avoidance of an aggregate overall contribution is welcomed.	BDC recognise the District is comprised of a number of distinct settlements, some of which are excluded from the Green Belt. Therefore, as this Green Belt Assessment is District centred, it seems appropriate to focus on preventing the merging of settlements excluded from the Green Belt in its current form or extent, rather than the narrow view of 'towns' or including all washed over settlements. Comment of support for avoiding an aggregate overall contribution conclusion is noted and has been consulted on via Q2g and BDC responses to these representations.
107	John	Jowitt	PJ Planning	Yes	Comments noted.
110	Gareth	Sibley	RCA Regeneration	Approach agreed.	Comments noted.
111	Gareth	Sibley	RCA Regeneration	Agree	Comments noted.
112	Gareth	Sibley	RCA Regeneration	Agree with this approach	Comments noted.
113	Gareth	Sibley	RCA Regeneration	Agree with this approach.	Comments noted.
115	John	Breese	Rosconn Strategic Land	RSL consider that the connection to the wider countryside should play an increased role in the assessment of contribution. It is considered that given the proposed large scale of a number of the parcels which directly abut Bromsgrove and the Large Settlements the ability to accurately assess the contribution to the safeguarding encroachment is diminished. Smaller sub areas within the parcels which directly abut these settlements may well be affected by urbanising elements such as their proximity to built form, adjacent roads/tracks or enclosing characteristics such as tree belts and other existing boundaries but these elements will not necessarily be captured.	Comment noted - it is acknowledged that where parcels abut existing settlements there may be some difference in how a parcel performs against Green Belt purposes (particularly relating to sprawl or encroachment) from one side of the parcel to the other; however this will be factored into the assessment and will not be a detriment to any area or land parcel.
122	Michael	Davies	Savills	We agree with the proposed measures for assessing the strength of contribution. We would like to highlight that the references to strength of contribution should be tightened to include a definition of what is discussed as determines the strength of contribution of each parcel.	Comment noted - the terminology will be reconsidered to identify if any further clarity can be.
123	Michael	Burrows	Savills	In a broad sense we agree that the proposed measures for assessing the strength of contribution appear to be logical. However we wish to highlight that it would be helpful if the proposed measures are supported by explanations and definitions for some of the terminology used to provide clarity.	Comment noted - the terminology will be reconsidered to identify if any further clarity can be.
134	David	Barnes	Star Planning	Strength of contribution will inevitably generate crude results from some of the larger parcels. Loss of openness for the parcel may result in harm but there is no caveat that indicates part of a parcel could be developed without harm to the purpose of preventing neighbouring towns merging. Or a parcel could contain sites which do not materially contribute towards safeguarding the countryside from encroachment. There is no recognition that controlled or planned growth does not equate to unrestricted sprawl.	Comment noted - it is acknowledged that there may be some difference in how a parcel performs against Green Belt purposes (particularly relating to sprawl or encroachment) from one side of the parcel to the other. However Part 1 of the Assessment is proposed to be flexible enough to enable specific localities or features within a parcel to be observed and recorded, whilst giving commentary on how the parcel performs as a whole against each purpose.
137	Matthew	Fox	Turley	In the Assessment Criteria for Strength of Contribution for Purpose 1 it is considered that it may be difficult to distinguish between 'moderate' and 'weak' in certain instances because of the references to defensible boundaries. For example, a Parcel which does not possess a defensible boundary, or it is deemed weak/partial, would point towards it being highly sensitive to unrestricted sprawl if released so it therefore makes an important contribution. To avoid any confusion we would suggest that the definitions are made clearer.	Comment noted. Consideration will be had to identify where further clarity can be included. It is the difference in the subtleties which will allow the distinction to be made between the values of the Green Belt parcels.

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137	Matthew	Fox	Turley	Defensible boundaries should be referenced under Purposes 2 and 3. Under Purpose 2 there should be consideration of intervening features, such as the M42 Motorway, which provides significant physical barriers to prevent neighbouring towns from merging.	Comment noted - however as motorways across the District are regarded as defensible boundaries and therefore constitute a boundary for the purposes of parcel identification, there are no circumstances where they intervene across a parcel. To include as an assessment measure in Purpose 2 would therefore duplicate their consideration in Purpose 1. Regarding Purpose 3 assessment measures already consider urbanising features within or at the edge of parcels, which could include motorways for example, and there is therefore no need to consider defensible boundaries in this context.
153	Elizabeth	Mitchell	Mitchell Planning	Regarding proposed 'strong' strength of contribution rating for Purpose 4, to score all parcels close to a CA boundary highly just due to location is a simplistic mechanism not looking at the character of each CA and its significance. It may be that space/views can be incorporated into development rather than an initial negative constraint. It is unlikely that the GB itself is key to setting. Open space and visual links may be important and this depends on the character appraisal of each CA. Similarly extending other settlements currently (and wrongly in my view) described as 'Historic towns' could be prematurely rejected based on the Councils possibly restrictive approach to historic settlements and land parcels adjacent such settlements. Consideration of the purpose of releasing land and not only the purpose of the GB would seem necessary at an early stage.	It is considered that as the Green Belt is a significant distance from the historic core of Bromsgrove, including this within the assessment would not be relevant for the Assessment. Therefore purpose 4 will not be used for assessment purposes in the Assessment.
161	Ian	Macpherson		Yes	Comments noted.
185	Paul	Frost		Proposed measures are sound	Comments noted.
<b>2f. Do you have any specific suggestions as to how the relationship of the surrounding Green Belt parcels (specifically S3, S4, SE9 and SE10) to be planned development areas now excluded from the Green Belt (namely Foxlydiate and Brockhill East to the north of Redditch), should be considered in the assessment? Until development commences, these areas still exhibit some of the characteristics of Green Belt land.</b>					
2	Gill	Lungley	Barnt Green Parish Council	Believe the sites specified should be removed from the Green Belt and allocated to Bromsgrove District Council.	It is not the intention of this study to remove sites from the Green Belt. The purpose of the study is to consider how the Green Belt parcels function against the Green Belt purposes.
4	Barry	Spence	Bentley Pauncefoot Parish Council	Areas of surrounding Green Belt should be protected from anything but very small scale development.	It is not the intention of this study to protect Green Belt parcels from development. The purpose of the study is to consider how the Green Belt parcels function against the Green Belt purposes.
11	Rosamund	Worrall	Historic England	Potential to consider parcels S3, S4, SE9 and SE10 under two scenarios (developed and undeveloped) so that overall impact in relation to Foxlydiate and Brockhill can be ascertained. Potential opportunities for mitigation could be highlighted as part of considerations if both scenarios are individually set out.	The question posed does not intend to consider the impact upon Foxlydiate and Brockhill. The question is focused on the impact upon the Green Belt parcels adjoining the allocated sites. Mitigation measures are not appropriate to consider at this stage but are relevant for the Sustainability Appraisal.
28	Emily	Barker	Worcestershire County Council	Advise a consistent approach. Recommend applying the same methodology here.	Comments noted.
51	Gemma	Jenkinson	Claremont Planning Spitfire Bespoke Homes	Advocate that these sites should be assessed on the basis that they will be developed in due course and should be considered on the assumption that development is completed in accordance with approved plans.	It is assumed the response is referring to the Foxlydiate and Brockhill sites. Agreed. It is considered that the most appropriate approach will be to consider the Foxlydiate and Brockhill sites are developed in accordance with suggested plans and therefore the Green Belt parcels will be assessed with this in mind.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	These sites should be assessed on the basis that they will be developed in due course and should be considered on the assumption that development is completed in accordance with the approved plans.	It is assumed the response is referring to the Foxlydiate and Brockhill sites. Agreed. It is considered that the most appropriate approach will be to consider the Foxlydiate and Brockhill sites are developed in accordance with suggested plans and therefore the Green Belt parcels will be assessed with this in mind.
54	Katherine	Else	Claremont Planning Miller Homes	These sites should be assessed on the basis that they will be developed in due course and should be considered on the assumption that development is completed in accordance with the approved plans. Particularly relevant given that Redditch isn't reviewing its development plan. The plan review should seek to focus Green belt reviews to the north of Redditch through	It is assumed the response is referring to the Foxlydiate and Brockhill sites. Agreed. It is considered that the most appropriate approach will be to consider the Foxlydiate and Brockhill sites are developed in accordance with suggested plans and therefore the Green Belt parcels will be assessed with this in mind. The Green Belt purposes assessment will only consider the Green Belt land against the purposes of

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				Brockhill West, recognising that this area has to accommodate sustainable residential communities without undue detriment to the GB purposes.	the Green Belt. This is a separate assessment to the BDP Review.
65	Louise	Steele	Framptons Summix Ltd	Parcel SE7 could also be considered to have similar circumstances as S3, S4, SE9 and SE10. Where development proposals are pending on land that was previously Green Belt, specific consideration as to the opportunity for identifying and or strengthening new Green Belt boundaries within these parcels should form part of the assessment processes.	Agreed that SE7 should be treated in the same was as S3, S4, SE9 and SE10. It may be that during Part 2 of the assessment Green Belt boundaries of submitted sites are selected.
76	Emily	Vyse	GVA University of Birmingham	Until such time as the planned development areas excluded from the Green Belt, as defined in the adopted BDP, are developed, the surrounding parcels should be considered as they stand in situ, that being Green Belt land separated from an existing urban edge by green fields. It would be inappropriate to assume that the entirety of the allocations will be delivered in full during the plan period or, to assume how that development would take shape on the ground, i.e. where will the developable area lie and infrastructure run to. The release of further land beyond these allocations, in advance of that development coming forward in full, would not be sustainable. Its development in isolation and in advance of the existing allocations coming forward would see the establishment of new settlements which would require significant new infrastructure and investment or, if seen as part of Redditch, would create severed communities.	It is agreed that it is unclear how development on the allocated sites would be delivered and appear on the ground. However, the sites are allocated in the BDP and therefore it would be remiss to consider them as undeveloped. It is not the intention of the Green Belt study to remove sites from the Green Belt, the intention of the study is to consider how the land parcels perform against the purposes of the Green Belt.
83	Patrick	Downes	Harris Lamb Willowbrook Garden Centre	Agreed, as long as certain parcels (including potentially sub parcels) are not discounted from further assessment in Part 2.	Comments noted and agreed. It is not the intention of the study to discount parcels.
88	Abbie	Connelly	Lichfields Taylor Wimpey Strategic Land	Must ensure that the Green Belt analysis takes account of all known forthcoming changes to a Local Authority area, including the implementation of extant planning permissions and/or adopted District Plan allocation sites. Likely to have a significant impact on the character of various assessment parcels and their contribution to the Green belt and it would be unreasonable to assess adjoining parcels on the basis of their current context, rather than the permitted/allocated context. Particularly important to ensure that the assessment is based on the expected future character of the area, as this is likely to be substantially different to the existing character.	With regard to allocated sites in the adopted BDP it is agreed that they should be considered in the context that they will be developed in accordance with the submitted Masterplans.  With regard to extant planning permissions it is considered that due to the varying scale and the dispersed nature of the permissions granted it is not appropriate for the Green Belt purposes assessment to consider these. The comment regarding the future character of the area will be addressed though work on the Landscape Character evidence base, which will inform the BDP Review.
98	Sally	Oldaker		You still need to consider them, as S4 is a buffer between Bromsgrove and Redditch.	Comments noted.
99	Mark	Dauncy	Pegasus Gallagher Estates	Considered that these parcels should be excluded from the Green Belt Assessment. Unless GB boundaries are amended to reinstate these sites back to the Green belt then no need for further assessment.	Agreed. The Foxlydiate and Brockhill sites have been removed from the Green Belt and will not be reinstated into the Green Belt.
110	Gareth	Sibley	RCA Regeneration Duchy Homes	As the development has not begun, it should be re-considered having regard to its Green Belt role. It is considered that the allocation should be subject to review as it has not yet delivered.	Although development has not yet begun these sites have been removed from the Green Belt and will not be reinstated.
111	Gareth	Sibley	RCA Regeneration Mr and Mrs Watson	As the development has not begun, it should be re-considered having regard to its GB role. This is because we consider the allocation should be subject to review as it has not yet delivered.	Although development has not yet begun these sites have been removed from the Green Belt and will not be reinstated.
112	Gareth	Sibley	RCA Regeneration Piper Group	As the development has not begun it should be reconsidered having regard to its Green Belt role.	Although development has not yet begun these sites have been removed from the Green Belt and will not be reinstated.
113	Gareth	Sibley	RCA Regeneration CAD Square	As development has not begun it should be reconsidered having regard to its GB role.	Although development has not yet begun these sites have been removed from the Green Belt and will not be reinstated.
161	Ian	Macpherson		Identified for development and should be removed from the Green Belt now.	The Foxlydiate and Brockhill sites are removed from the Green Belt. However, for clarification I and parcels S3, S4, SE9 and SE10 are still within the Green Belt and will be assessed during the Green Belt assessment to consider how they function against

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					the purposes of the Green Belt.
174	Michael	Corfield		The surrounding GB parcels (specifically S3, S4, SE9 and SE10) to planned development areas now excluded from the GB, should be given enhanced weighting for their contribution in checking unrestricted sprawl of large-built up areas and safeguarding the countryside from encroachment.	Comments noted. It is considered that Table 3 in the Green Belt Purposes Assessment Document, the column entitled 'Strength of Contribution' will allow this to be addressed.
176	Mr & Mrs J D	Winslow		You stress, once again, in this question, that Foxlydiate is now considered to be excluded from the Green Belt and still exhibits "some of the characteristics of Green Belt land". We suggest that the site exhibits all of the characteristics of Green Belt land and that, since development to serve Redditch's housing needs is no longer required, there is no necessity to consider, in any specific way, its relationship to surrounding Green belt parcels. It should be treated in the same way as other parts of the Green Belt within the District of which it is part.	The Foxlydiate and Brockhill sites have been removed from the Green Belt through the adopted BDP and are allocated sites, as such will not be reinstated into the Green Belt. For clarification, it has not been determined that these sites are no longer required. They have been removed from the Green Belt through the BDP to serve Redditch's housing needs, this is still the situation.
185	Paul	Frost		S3, S4, SE9 & SE10 should be considered as Green Belt.	Comments noted.
<b>2g. Do you agree that an overall conclusion on the strength of each Green Belt parcel should not be drawn?</b>					
1	Tammy	Williams	Alvechurch Parish Council	No. A conclusion should be drawn otherwise the assessment means little.	Disagreement noted. The purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt some 40+ years ago, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete a baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.
2	Gill	Lungley	Barnt Green Parish Council	Yes – agree it is a pragmatic approach	Agreement noted
4	Barry	Spence	Bentley Pauncefoot Parish Council	Agrees that the overall conclusion on the strength of each parcel shouldn't be drawn by merging scores attributed to each Green Belt purpose.	Agreement noted
43	Mark	Sitch	Barton Willmore The Church Commissioners for England	Agree that the assessment should remain qualitative and encourage the Council to weigh the findings of each parcel carefully against the need to accommodate the necessary housing growth over the plan period. Even where a site offers a strong contribution to some of the GB purposes, a site may still be considered as the most sustainable location for development (NPPF Para 138).	Agreement noted. Site analysis within Green Belt parcels will form Part 2 of the Green Belt Assessment. No site specific analysis will be undertaken in the Part 1 Assessment.
48	Grace	Allen	CBRE Arden Park Properties	An overall conclusion, whether it be quantitative or not, not be provided, the assessments against each purpose must be consistent so as to enable comparisons between the parcels.	Comments noted.
51	Gemma	Jenkinson	Claremont Planning Spitfire Bespoke Homes	Yes. The review must serve as an evidence base document that informs the strategic options to be pursued. In connection with this, Stage 1 assessment should not prohibit the ability of smaller sites within a parcel to be suitable for development. By not applying a scoring to the parcels assessed there is the ability for the land areas to progress to the Stage 2 process of reviewing smaller land components without prejudice and for release sites to be clearly defined. It is our views that the parcels should be broken down into smaller parcels and scored individually in terms of the purpose they serve to the Green Belt.	Agreement noted. Site analysis within Green Belt parcels will form Part 2 of the Green Belt Assessment. No site specific analysis will be undertaken in the Part 1 Assessment.
52	Tom	Ryan	Claremont Planning Bellway Homes	Each parcel should be assessed in terms of its overall contribution to the GB purposes but it is not the purpose of the review process to identify most preferable locations. Any sort of scoring mechanism could be used to influence the strategic options arising through the Local Plan review process	Comments noted.

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				which is not the intended outcome of the GB review process. Must serve as an evidence base document to inform the strategic options to be pursued.	
52	Tom	Ryan	Claremont Planning Bellway Homes	Our view that the parcels should be broken down into smaller parcels and scored individually in terms of the purpose they serve to the GB.	Site analysis within Green Belt parcels will form Part 2 of the Green Belt Assessment. No site specific analysis will be undertaken in the Part 1 Assessment.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	Each parcel should be assessed in terms of its overall contribution toward the Green Belt functions identified but that it is not the purpose of this review process to identify the most preferable locations. The avocation of any sort of scoring mechanism or strength testing could be used to influence the strategic options arising through the Local Plan review process, which is not the intended outcome of this review process. The review must serve as an evidence base document that informs the strategic options to be pursued. The stage 1 assessment should not prohibit the ability of smaller sites within a parcel to be suitable for development. By not applying a scoring to the parcels assessed there is the ability for the land areas to progress to the Stage 2 process of reviewing smaller land components without prejudice and for release sites to be clearly defined. The parcels should be broken down into smaller parcels and scored individually in terms of the purpose they serve to the Green Belt.	Comments noted.
54	Katherine	Else	Claremont Planning Miller Homes	Each parcel should be assessed in terms of its overall contribution toward the Green Belt functions identified but that it is not the purpose of this review to identify the most preferable locations. Avocation of any sort of scoring mechanism/strength testing could be used to influence the strategic options arising through the Local Plan review process. The review must serve as an evidence base document that informs the strategic options to be pursued.	Comments noted.
63	Fiona	Lee-McQueen	Framptons Bellway Homes	It is considered that some form of matrix or scoring would be required to reach overall conclusions following the assessment. However, this needs to be done on a site disaggregated basis with proper understanding of the West Midlands Green Belt context. There is a potential that if only a commentary is provided, it will be difficult to form conclusions.	A matrix system is not considered appropriate as it is felt this type of scoring system may lead readers to draw conclusions of development locations. It is not the purpose of this review to identify development locations. The review is an evidence base document that informs the BDP Review which will propose locations.
64	Peter	Frampton	Framptons Mr I Rowlesge	Agreed.	Agreement noted
76	Emily	Vyse	GVA University of Birmingham	It ought not to be necessary to calculate an overall score for each parcel if sites promoted through, for example, the SHLAA and call for sites processes, are to be assessed individually in Green Belt terms during Stage 2.	Comments noted. Site analysis within Green Belt parcels will form Part 2 of the Green Belt Assessment. No site specific analysis will be undertaken in the Part 1 Assessment.
78	Sean	Rooney	Harris Lamb Barratt Homes	Agree that no conclusion should be drawn. As long as certain parcels are not discounted from further assessment in the Part 2 exercise, then we have no objection to the methodology.	Comments noted. Site analysis within Green Belt parcels will form Part 2 of the Green Belt Assessment. No site specific analysis will be undertaken in the Part 1 Assessment. Areas will not be discounted during Part 1.
80	John	Pearce	Harris Lamb Bloor Homes	We agree that no conclusion on the strength of each parcel assessed as part of the Part 1 assessment should be drawn. By not ranking the different parcels an overview of how the GB performs as a whole will be established.	Agreement noted
82	Sean	Rooney	Harris Lamb Stoke Prior Developments	We agree no conclusion should be drawn for Part 1 assessment as the intention is to provide a high level assessment at a strategic level. Once an overview of how the GB performs as a whole is established, a finer grain assessment can be undertaken, as proposed in Part 2, of individual sites and the impact if they were removed from the GB.	Agreement noted
84	Patrick	Downes	Harris Lamb Worcestershire Health and Care NHS Trust	Agree that no conclusion on the strength of each parcel assessed as part of the Part 1 assessment should be drawn. As long as certain parcels (including potentially sub parcels) are not discounted from further assessment in the Part 2 exercise, then we have no objection to the methodology."	Comments Agreement noted. Site analysis within Green Belt parcels will form Part 2 of the Green Belt Assessment. No site specific analysis will be undertaken in the Part 1 Assessment. Areas will not be discounted during Part 1.
86	Rebecca	Anderson	Iceni Projects	Yes, at this stage given there will be a second stage and this Stage 1	Agreement noted

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			Generator Developments	assessment will not be used to draw conclusions.	
88	Abbie	Connelly	Lichfields Taylor Wimpey Strategic Land	If no overall conclusion is drawn, it will not be possible to make robust and transparent decisions in respect of the parcels that should be progressed to the detailed assessment stage and those which should ultimately be removed from the Green belt.	Comments noted. This is not the intention of the Part 1 assessment. The purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt some 40+ years ago, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete a baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent. Part 2 will assess individual sites that have been submitted to the council from a range of sources.
90	Owen	Jones	LRM Planning Persimmon Homes	We agree with this on the basis of the fact that, in all likelihood different parts or areas within the strategic parcel will contribute to the functions to a greater or lesser extent. Therefore, a qualitative assessment rather than a scoring is the most significant output from this part of the assessment.	Agreement noted
91	Max	Plotnek	Maddox Planning David Goldstein	Approach is supported.	Agreement noted
99	Mark	Dauncy	Pegasus Gallagher Estates	Analysis should focus on a commentary against each of the Green Belt purposes.	Agreement noted
107	John	Jowitt	PJ Planning Bromsgrove Golf Course	Yes, it is not appropriate to combine the various purposes of the Green Belt.	Agreement noted
110	Gareth	Sibley	RCA Regeneration Duchy Homes	Approach agreed.	Agreement noted
111	Gareth	Sibley	RCA Regeneration Mr and Mrs Watson	Agree that no overall conclusions should be drawn at this point.	Agreement noted
112	Gareth	Sibley	RCA Regeneration Piper Group	Agree that no overall conclusions should be drawn at this point.	Agreement noted
113	Gareth	Sibley	RCA Regeneration CAD Square	Agree that no overall conclusions should be drawn at this point.	Agreement noted
115	John	Breese	Rosconn Strategic Land	RSL agree that the overall conclusion of the strength of each Green Belt Parcel should not be drawn at Stage 1. As referred to in the submission to question 2a, the proposed extent of parcels which are adjacent to settlements as currently drawn may give an inaccurate assessment of the different contribution different sections of the parcel make to the Green Belt purposes as such a quantitative score could exasperate the limitations caused by this.	Agreement noted. Site analysis within Green Belt parcels will form Part 2 of the Green Belt Assessment. No site specific analysis will be undertaken in the Part 1 Assessment.
122	Michael	Davies	Savills Landowners	We agree that an overall conclusion on the strength of each Green Belt parcel should not be drawn from the assessment. We agree with paragraph 2.12 that due to variations in the comparability of different purposes and the varying sizes of each parcel, a straight comparison of parcels based on one figure is unhelpful. Rather an overall interpretation of the wider considerations for each parcel is most acceptable.	Agreement noted
123	Michael	Burrows	Savills Landowners	The ideal outcome from the assessment would be to have an overall conclusion for each Green Belt parcel, as well as identifications of variation within each parcel. However we accept that, as highlighted in paragraph 2.12 of the Green Belt Purposes Assessment Methodology consultation document, aggregating the strength of contribution scores for each parcel	Disagreement noted.

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				may be misleading due to variations in the comparability of different purposes and the varying sizes of each parcel.	
125	Alastair	Thornton	Simply Planning Woodpecker Plc	Wholly agree with the assertion that the overall conclusion on the strength of each GB boundary should not be drawn. A detailed commentary on the respective land parcels alongside an appropriate analysis will ultimately allow for more informed judgements to be formed regarding the merits of land release.	Agreement noted.
134	David	Barnes	Star Planning Richborough Estates	Overall conclusions about the strength of each parcel should not be drawn because it would be too crude especially for larger parcels.	Agreement noted
153	Elizabeth	Mitchell	Mitchell Planning	Yes agreed, it may well be better to have each component identifiable rather than just an overall figure which will aid any re-assessment.	Agreement noted
161	Ian	Macpherson		No. No point in stage 1 if there is no such conclusion. Put parcels into categories rather than rank them.	Disagreement noted. The purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt some 40+ years ago, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete a baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent. No scores or ranking order will be afforded to parcels.
176	Mr & Mrs J D	Winslow		A somewhat debatable question since one could query the purpose of a Green Belt review of a particular parcel if conclusions are not to be drawn from the evidence collected. We assume that the aim is to avoid the danger of a "set in stone" approach so that land parcels can be more easily considered within the wider and necessarily more flexible context.	The purpose of the Part 1 Assessment is to take stock of the Green Belt within Bromsgrove District. Since the designation of the West Midlands Metropolitan Green Belt some 40+ years ago, no assessment against the Green Belt Purposes has ever been undertaken. The Green Belt Assessment provides an opportunity to complete a baseline analysis to better understand how the Green Belt in the District performs and to understand various complexities that may exist, which would be useful as Part 2 is undertaken. It is important that Part 2 is underpinned by informed background knowledge to ensure that the process of identifying land for removal from the Green Belt is robust, transparent and consistent.
179	Neil	Gow	Burcot Garden Centre	No, each potential site where development is wanted should be assessed on its own merits - greenfield, brownfield, green belt.	Disagreement noted. Individual sites will be assessed during Part 2 of the study.
185	Paul	Frost		Overall conclusion on the strength of each parcel shouldn't be drawn due to variation in parcel size.	Agreement noted
<b>2h. Are there areas that the study could focus on, where the existing Green Belt could be used more positively, such as improved public access, without impinging its essential characteristics?</b>					
1	Tammy Williams		Alvechurch Parish Council	Possibly, however great care must be taken to prevent inappropriate uses that may lead to unintended consequences in rural areas.	Comments noted.
52	Tom Ryan		Claremont Planning OBH Bellway Homes	Study could take into account potential benefits of development/GB release, with facilitated public access, improved landscapes, defined settlement edges and removal of harmful features. Could also encourage better accessibility to areas of retained GB by encouraging linkages from existing settlements to natural features such as woodlands and waterways.	Comments noted. The site selection process will go into more site specific information and detail of individual parts of the parcel including any positive and negative features.
161	Ian McPherson			Unable to identify them at this stage.	Comments noted.
138	Charles Robinson		Twelvetwentyone	There are areas where development should be encouraged and GB boundaries amended and where smaller GB buffers can achieve separation and prevent coalescence in a proactive manner.	Comments noted. The process will be supported by a robust evidence base to support any future amendment of GB boundaries through the Local Plan Review Process.
51	Gemma Jenkinson		Claremont Planning OBO Spitfire	The study could take into account the potential benefits of development/Green belt release, with facilitated public access, improved	Comments noted. The process will be supported by a robust evidence base to support any future amendment of GB boundaries through the Local Plan Review

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			Homes	landscapes, defined settlement edges and removal of harmful features. The consideration of how Green Belt releases could encourage people to undertake more healthy lifestyles through improved connections and accessibility to recreation areas could facilitate benefits to the wider social function of Green Belt. For example, expansion of key settlements into the Green Belt can create better access to less urban facilities.	Process.
53	Gemma Jackson		Claremont Planning OBO McTaggart and Mickel Group	The study could take into account the potential benefits of development/Green Belt release, with facilitated public access, improved landscapes, defined settlement edges and removal of harmful features. The release of Green Belt land could be used to encourage better accessibility to certain areas of retained Green Belt by encouraging linkages through from existing settlements to less urban areas and natural features such as woodlands and waterways. The consideration of how Green Belt releases could encourage people to undertake more healthy lifestyles through improved connections and accessibility to recreation areas could facilitate benefits to the wider social function of Green Belt. For example, expansion of key settlements into the Green Belt can create better access to less urban facilities.	Comments noted. The site selection process will go into more site specific information and detail of individual parts of the parcel including positive and negative features.
76	Emily Vyse GVA OBO University of Birmingham		GVA OBO University of Birmingham	The focus of the study should therefore be on the assessment of Green Belt land and whether it contributes to the purposes of the Green Belt or whether it could be released to meet the identified future development needs and beyond. Consideration as to whether the existing Green Belt could be used more positively to improve public access without impinging on its essential characteristics is something that should be considered separately, i.e. once GB boundaries have been defined (NPPF #141).	Comments noted. The site selection process will go into more site specific information and detail of individual parts of the parcel including positive and negative features and is a separate exercise.
99	Mark Dauncey		Pegasus OBO Gallagher Estates	Should take into account positive role that a site can play in enhancing the beneficial use of the Green Belt.	Comments noted. The site selection process will go into more site specific information and detail of individual parts of the parcel including positive and negative features.
185	Paul Frost			Always areas of GB that could be used more positively through public access provision.	Comments noted
80	John Pearce		Harris Lamb OBO Bloor Homes	Guidance in the Framework advises that local planning authorities can take into consideration the benefits that can arise through using the GB more positively. Clearly, any benefits that may arise may be lost if the site or parcel is developed. It seems at odds to assess a parcel positively in terms of future benefits from a GB perspective when a part of it is being considered for removal from the GB.	Comments noted. The site selection process will go into more site specific information and detail of individual parts of the parcel including positive and negative features.
88	Abbie Connelly		Lichfields OBO Taylor Wimpey	Focus of the Study should be a review of the GB parcels against key strategic GB Objectives (NPPF PARA 139), rather than other considerations such as improved access.	Comments noted. Part 1 will assess how the Green Belt performs against the purposes of the Green Belt.
54	Katherine Else		Claremont Planning OBO Miller Homes	Encouraging linkages through from existing settlements to less urban areas and natural features such as woodlands/waterways Could facilitate benefits to the wider social function of Green belt.	Comments noted.
114	Charles Robinson		Rickett Architects OBO Cawdor	There are areas where development could be encouraged such as on the periphery of Solihull/Halesowen and where smaller Green Belt buffers can achieve separation and prevent coalescence, with the provision of sports and other uses in the Green Belt.	Comments noted. The process will be supported by a robust evidence base to support any future amendment of GB boundaries through the Local Plan Review Process.
<b>2i Do you feel that there is any scope to designate new land as Green belt in Bromsgrove District?</b>					
1	Tammy	Williams	Alvechurch Parish Council	No	Comment noted.
2	Gill	Lungley	Barnt Green Parish Council	No – there is no scope to designate new land as Green Belt	Comment noted.



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48	Grace	Allen	CBRE Arden Park Properties	There is very limited scope to designate any further GB land.	Comment noted.
51	Gemma	Jenkinson	Claremont Planning Spitfire Bespoke Homes	There is no scope to designate any new land as Green Belt and insufficient very special circumstances exist to justify new Green Belt Allocation.	Comment noted.
52	Tom	Ryan	Claremont Planning Bellway Homes	As 90% of the district is currently GB, we are of the opinion that there is no scope to designate any new land as GB and insufficient very special circumstances exist to justify new GB allocation.	Comment noted.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	As 90% of the district is currently Green Belt, there is no scope to designate any new land as Green Belt in the district and insufficient very special circumstances exist to justify new Green Belt allocation.	Comment noted.
54	Katherine	Else	Claremont Planning Miller Homes	There is no scope to designate any new land as Green belt.	Comment noted.
76	Emily	Vyse	GVA University of Birmingham	<p>As it stands, 90% of the District is already designated as Green Belt and it has been established that there is insufficient non-Green Belt land available to deliver the District's identified development needs for the plan period, or indeed the additional need that has arisen from other authorities through the Duty to Cooperate.</p> <p>Notwithstanding the fact that there is extremely little non-Green Belt land left to designate in the District, it is considered that even if there were, exceptional circumstances could not be demonstrated in this instance to justify the designation of any new land as Green Belt.</p>	Comments noted.
78	Sean	Rooney	Harris Lamb Barratt Homes	We do not consider this to be an exceptional circumstance to justify the creation of new Green Belt. Designating more Green belt would surely just create further problems for the Council in seeking to meet its longer term development needs.	Comment noted.
80	John	Pearce	Harris Lamb Bloor Homes	The suggestion of new GB appears to be made to compensate for the fact that land is currently going to be removed from the GB in the District. We do not consider this an exceptional circumstance to justify the creation of new GB. In fact, we consider that the issue of creating more GB when the council are currently looking to take land out of the GB is totally non-sensical.	While 90% of the District is designated as Green Belt, there are some settlements that are not currently washed over with Green Belt. It is acknowledged that there is limited scope to designate any further land within the District as Green Belt; however the NPPF makes it clear that new Green Belt land can be established in exceptional circumstances. This will be considered in more detail when settlement boundaries are reviewed as part of the evidence base.
82	Sean	Rooney	Harris Lamb Stoke Prior Developments	Designating new land as GB seems to conflict with the purposes of the assessment and the exercise seems futile. Suggestion of new GB seems to be made to compensate for removal of other GB land - do not consider this to be exceptional circumstances to justify designating new GB. Creating new GB would only store up further problems for the Council in seeking to meet its longer term development needs.	While 90% of the District is designated as Green Belt, there are some settlements that are not currently washed over with Green Belt. It is acknowledged that there is limited scope to designate any further land within the District as Green Belt; however the NPPF makes it clear that new Green Belt land can be established in exceptional circumstances. This will be considered in more detail when settlement boundaries are reviewed as part of the evidence base.
83	Patrick	Downes	Harris Lamb Willowbrook Garden Centre	No justification in such an exercise. Creating new Green Belt to compensate for loss of Green Belt elsewhere is not considered to be an exceptional circumstance. Given that 90% of the District is currently Green Belt, it would seem illogical to extend the Green Belt further. There is no explanation as to the extent of protection this would provide and what would be the point of doing it.	While 90% of the District is designated as Green Belt, there are some settlements that are not currently washed over with Green Belt. It is acknowledged that there is limited scope to designate any further land within the District as Green Belt; however the NPPF makes it clear that new Green Belt land can be established in exceptional circumstances. This will be considered in more detail when settlement boundaries are reviewed as part of the evidence base.
84	Patrick	Downes	Harris Lamb Worcestershire Health and Care NHS Trust	No justification for this. Suggestion of new Green Belts appears to be made to compensate for the fact that land is currently going to be removed from the Green belt. Do not consider this to be an exceptional circumstance. Could store up further problems for the Council in seeking to meet its longer term development needs.	While 90% of the District is designated as Green Belt, there are some settlements that are not currently washed over with Green Belt. It is acknowledged that there is limited scope to designate any further land within the District as Green Belt; however the NPPF makes it clear that new Green Belt land can be established in exceptional circumstances. This will be considered in more detail when settlement

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					boundaries are reviewed as part of the evidence base.
88	Abbie	Connelly	Lichfields Taylor Wimpey Strategic Land	There is no scope for new Green Belt land to be designated within the Bromsgrove District.	Comment noted.
99	Mark	Dauncy	Pegasus Gallagher Estates	There is very little scope to designate new areas of Green Belt to compensate for that which could be potentially lost.	While 90% of the District is designated as Green Belt, there are some settlements that are not currently washed over with Green Belt. It is acknowledged that there is limited scope to designate any further land within the District as Green Belt; however the NPPF makes it clear that new Green Belt land can be established in exceptional circumstances.
110	Gareth	Sibley	RCA Regeneration Duchy Homes	It is not considered that BDC has any legitimate (or exceptional circumstances) that could justify the addition of new sites into the Green Belt.	Comment noted.
111	Gareth	Sibley	RCA Regeneration Mr and Mrs Watson	No, we do not consider BDC have any legitimate (or exceptional circumstances) that could justify the addition of new sites into the GB.	Comment noted.
112	Gareth	Sibley	RCA Regeneration Piper Group	Do not consider there are any legitimate circumstances that could justify the addition of new sites to the Green Belt.	Comment noted.
113	Gareth	Sibley	RCA Regeneration CAD Square	We do not consider that BDC have any legitimate (or exceptional circumstances) that could justify the addition of new sites into the GB.	Comment noted.
161	Ian	Macpherson		No.	Comment noted.
185	Paul	Frost		Yes.	Comment noted. Officers will consider any land identified that has potential to be designated as Green Belt.
<b>2j. Do you have any thoughts on the proposal that the detailed review of boundaries around existing settlements and the status of washed-over settlements, is carried out as a separate exercise to the assessment of the identified Green Belt parcels against the NPPF purposes?</b>					
1	Tammy	Williams	Alvechurch Parish Council	Yes. Those villages that are washed over should remain so because of their open character and strong relationship with the landscape in which they are located.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
52	Tom	Ryan	Claremont Planning Bellway Homes	These two matters go hand in hand but a detailed review of settlement boundaries should be undertaken subsequent to the GB purposes assessment. In locations which present a natural expansion to an existing settlement boundary this is likely to weaken an area's purpose making it more suitable for future GB release. Council could consult on both matters at same time, or even undertake a settlement boundary review prior to the GB purpose assessment.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
117	Darren	Oakley	RPS Group Messrs Wild, Johnson, McIntyre & Fisher	Welcome the inclusion of a detailed assessment of settlement boundaries within scope of GB review. RPS suggest that it might be prudent to extend the proposed plan period beyond 2036 to facilitate adoption of an updated GB Boundary without the need for more frequent, incremental alterations to the GB.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
161	Ian	Macpherson		Assessment of these boundaries should be part of the whole exercise. Detailed boundary could be established through neighbourhood plans where they exist.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
138	Charles	Robinson	Twelvetwentyone Landowners	This should be a single exercise.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.

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112	Gareth	Sibley	RCA Regeneration Piper Group	If this allowed a more detailed look at parcels surrounding such settlements then could potentially support this.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
51	Gemma	Jenkinson	Claremont Planning Spitfire Bespoke Homes	These two matters go hand in hand but a staged process is required to allow the appropriate evidence base to be provided. Further explanation is required of how the two stages will be used together to demonstrate that that the staged process proposed will not hinder the effective identification of site releases. Would suggest that the Council consult on both matters at the same time, or even undertake a settlement boundary review prior to the Green Belt Purpose Assessment.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
63	Fiona	Lee-McQueen	Framptons Bellway Homes	A review of existing settlement boundary in the case of Wythall is a strategic matter; therefore this review should be carried out as a separate exercise. However, it may be possible to further disaggregate this parcel as part of a localised review of boundaries around Wythall.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	These two matters go hand in hand but a staged process is required to allow the appropriate evidence base to be provided. Further explanation in the methodology of how the two stages will be used together is required to demonstrate that the staged process proposed will not hinder the effective identification of site releases. It is important that the two stages should follow without delay and that a detailed review of settlement boundaries is undertaken subsequent to the Green Belt Purpose Assessment. In locations which present a natural expansion to an existing settlement boundary this is likely to weaken an areas purpose within the Green Belt making it more suitable for future Green Belt release. The Council should consult on both matters at the same time, or even undertake a settlement boundary review prior to the Green Belt Purpose Assessment.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
82	Sean	Rooney	Harris Lamb Stoke Prior Developments	This is not considered to be a separate exercise, more as a Part 3 to the current assessment following on from the work undertaken in Parts 1 and 2. Revisions to proposed boundaries are the logical conclusion to the work undertaken.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
113	Gareth	Sibley	RCA Regeneration CAD Square	If this allowed a more detailed look at parcels surrounding such settlements then could potentially support this.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
134	David	Barnes	Star Planning Richborough Estates	Do consider that a more refined and detailed approach is required to assess GB sites at sustainable locations.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
83	Patrick	Downes	Harris Lamb Willowbrook Garden Centre	Don't see this as a separate exercise, rather as Part 3 of the current assessment. Would prefer that this analysis was the conclusion of the exercise and followed on the work undertaken in Parts 1 and 2. The revisions to be proposed are the logical conclusion to the work undertaken and it seems illogical to separate this out from the main body of work being undertaken.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
91	Max	Plotnek	Maddox Planning	Boundaries around existing settlements should be considered thoroughly to	Comments noted. A detailed review of Green Belt boundaries and status of washed

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			David Goldstein	determine if there are sections that could be extended to accommodate sustainable development.	over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
110	Gareth	Sibley	RCA Regeneration Duchy Homes	If a more detailed look at parcels surrounding such settlements is allowed, then this could potentially be supported.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
2	Gill	Lungley	Barnt Green Parish Council	The review of washed-over settlements should be conducted simultaneously with the Green Belt Review.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
99	Mark	Dauncy	Pegasus Gallagher Estates	Assessment should be carried out once a spatial strategy and alternatives have been developed. Detailed review of GB boundaries should then follow, looking at boundaries of inset settlements at and the GB boundary with other built up areas to identify specific changes. Depends on whether the spatial strategy selected includes bringing forward development at these small settlements (as defined by Policy BDP2).	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
48	Grace	Allen	CBRE Arden Park Properties	The review of boundaries and washed over settlements should be informed by this GB Purposes Assessment in the first instance. The assessment should be carried out alongside the site selection methodology, and therefore be altered through District Plan Review.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
84	Patrick	Downes	Harris Lamb Worcestershire Health and Care NHS Trust	Don't see this as a separate exercise; it is more as Part 3 of the current assessment. Preference would be that this analysis was the conclusion of the exercise and followed on the work undertaken in parts 1 and 2.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
56	Peter	Chambers	David Lock Associates Birmingham Property Services	The approach outlined by the Council considers boundary changes to settlements within the district as a separate exercise to the GB parcel assessment. Whilst we do not object to this approach, consideration should be given to the potential for any boundary change from the allocation of a sustainable urban extension to Birmingham on land within Bromsgrove District as well as to the village boundaries within the District.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
185	Paul	Frost		Detailed review of settlement boundaries and status of washed over settlements could be carried out in a separate exercise.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
80	John	Pearce	Harris Lamb Bloor Homes	We don't see it as a separate exercise per se and see it more as a final stage of the current assessment. The revisions to be proposed are the logical conclusion to the work undertaken and it, therefore, seems logical to separate this out from the main assessment that has been undertaken.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
88	Abbie	Connelly	Lichfields Taylor Wimpey Strategic Land	Consider that priority should be given to urban extensions as sustainable growth options. Concerned that there is no definition of "the detailed review of boundaries around existing settlements" included within this question. May result in inconsistent interpretation of settlement boundaries, resulting in different land parcels being assessed differently in	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.

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				terms of their contribution to the GB purposes.	
111	Gareth	Sibley	RCA Regeneration Mr and Mrs Watson	If looking at settlements 'washed over' by GB allowed a more detailed look at parcels surrounding such settlements, then we could potentially support this.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
78	Sean	Rooney	Harris Lamb Barratt Homes	See this more as Part 3 of the current assessment. Preference would be that this exercise was the conclusion of the exercise and followed on the work undertaken as Parts 1 and 2. It seems illogical to separate this out from the main body of work that is being undertaken.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
119	Darren	Oakley	RPS Group Gleeson	We welcome the inclusion of a detailed assessment of settlement boundaries within the scope of the GB review. The revised NPPF (para 138-139) provides some useful guidance on how boundary reviews should be addressed. It states that any alterations should promote sustainable patterns of development, and should be able to demonstrate that GB boundaries will not need to be altered at the end of the plan period. To this end, we suggest that it might be prudent to extend the current proposed plan period beyond 2036 to facilitate the adoption of and updated GB boundary that has clear longevity, and which would support the delivery of appropriate development in sustainable locations, recognising the growing development needs of the District and neighbouring areas, without the need for more frequent incremental alterations to the GB.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
54	Katherine	Else	Claremont Planning Miller Homes	These two matters go hand in hand, a review of settlement boundaries should be undertaken simultaneously with the Green Belt Purpose Assessment.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
114	Charles	Robinson	Rickett Architects Cawdor	Should be one single exercise.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
194	Darren	Oakley	RPS Clients	We welcome the inclusion of a detailed assessment of settlement boundaries within the scope of the GBPA. The NPPF (para 138-139) provides some useful guidance on how boundary reviews should be addressed. We suggest that it might be prudent to extend the current proposed plan period beyond 2036 to facilitate the adoption of an updated GB boundary that has clear longevity, and which would support the delivery of appropriate development in sustainable locations.	Comments noted. A detailed review of Green Belt boundaries and status of washed over settlements will be undertaken post Part 1 and refined alongside Part 2 of the Green Belt Purposes assessment. Proposed changes will be presented as part of the Local Plan Review. Boundaries and washed over settlements will be assessed based on national guidance and professional planning judgement.
<b>2k. Do you agree with the proposed relationship between Bromsgrove's Green Belt Purposes Assessment and the Strategic Green Belt Review contained within the GBHMA Strategic Growth Study?</b>					
1	Tammy	Williams	Alvechurch Parish Council	Yes we agree	Comments noted.
1	Tammy	Williams	Alvechurch Parish Council	Yes we agree	Comments noted.
2	Gill	Lungley	Barnt Green Parish Council	No – with the Government's commitment to make funding available to clear up more brownfield sites in the Birmingham and West Midlands area and with the drop in the housing demand from Birmingham, the GBHMA Strategic Growth Study has become a redundant document.	Comment noted - BDC will ensure the Plan Review is in conformity with NPPF paragraph 137 regarding exploring reasonable options for meeting development needs, including making as much use as possible of suitable brownfield sites, before concluding that exceptional circumstances exist to justify changes to the Green Belt boundary.

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2	Gill	Lungley	Barnt Green Parish Council	An updated approach to cooperation with Birmingham should be adopted.	Comment noted - BDC will continue to engage with neighbouring local authorities, including Birmingham City Council, through the Duty to Cooperate.
35	Peter	King	Campaign to Protect Rural England	The number in the Hearn-Wood Study is far too high and doesn't take account of windfalls, ignore conversions and may underestimate the potential for higher densities.	Comment noted - Question 2k is concerned with the approach to the Green Belt Assessment, i.e. the methodological approach, within the GBHMA Strategic Growth Study and BDC's Green Belt Assessment, rather than the approach to calculating housing need and supply. The SGS will be further considered as BDC progresses the Plan Review, including evidence gathering to support housing need and supply.
43	Mark	Sitch	Barton Willmore	It is agreed that the Council's assessment should consider smaller land parcels which, in their own right, may not contribute significantly to the purposes of the GB. It is noted that the client's site, has been identified as part of an area suitable for "proportionate dispersal" and is considered that a more detailed review of the site as part of the GB review will support this conclusion.	Comment noted - the BDC methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District Green Belt functions against the Green Belt purposes, followed by more detailed review of specific sites at Part 2 of the assessment.
44	Kathryn	Ventham	Barton Willmore	Agreed that Council should carry out their own GB review using smaller parcels and more detailed analysis. However client's site in Parcel S7 is broadly within an area suitable for 'proportionate dispersal' and this should be taken into account going forward.	Comment noted - the BDC methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District Green Belt functions against the Green Belt purposes, followed by more detailed review of specific sites at Part 2 of the assessment.
45	Kathryn	Ventham	Barton Willmore	Agreed that Council should carry out their own GB review using smaller parcels and more detailed analysis.	Comment noted - the BDC methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District Green Belt functions against the purposes of the Green Belt, followed by more detailed review of specific sites at Part 2 of the assessment.
48	Grace	Allen	CBRE	It is appropriate to review the GB on a more local context as this will provide a more accurate assessment than the Strategic Green Belt Review in the GBHMA Strategic Growth Study, particularly when informing site selection.	Comment noted - the BDC methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District Green Belt functions against the purposes of the Green Belt, followed by more detailed review of specific sites at Part 2 of the assessment.
51	Gemma	Jenkinson	Claremont Planning	Bromsgrove cannot follow the methodology of the strategic Growth Study and needs to undertake a much more localised assessment which assesses smaller land parcels. The parcels proposed have not been justified apart from their landscape limit definitions.	Comment noted - the methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District green belt functions against the Green Belt purposes, followed by more detailed review of specific sites at Part 2 of the assessment. The parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document.
52	Tom	Ryan	Claremont Planning	BDC cannot follow the methodology of the GBHMA Strategic Growth Study GB review as this was across the West Midlands in its entirety. Need to undertake a much more localised assessment using smaller land parcels. The Council acknowledges this point at paragraph 2.31 however the parcels proposed have not been suitably justified.	Comment noted - the methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District green belt functions against the Green Belt purposes, followed by more detailed review of specific sites at Part 2 of the assessment. The parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document.
53	Gemma	Jackson	Claremont Planning	The GBHMA was a strategic Growth Study across the west midlands in it's entirety. Bromsgrove District cannot follow the methodology of this and need to undertake a much more localised assessment assessing smaller land parcels. The Council acknowledges this point at para. 2.31 of the consultation document, however, it is considered that the parcels proposed have not been justified.	Comment noted - the methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District green belt functions against the Green Belt purposes, followed by more detailed review of specific sites at Part 2 of the assessment. The parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in methodology document.
54	Katherine	Else	Claremont Planning	The parcels proposed still remain too large and smaller parcels need to be identified.	Comment noted - the parcels defined for assessment during Part 1 of the Green Belt Assessment are based on clear, defensible boundaries and the rationale for these is set out in the methodology document. Further consultation has taken place on the issue of defining parcels through the posing of Q2a in the methodology document and the Council's responses to consultation representations on this issue are also shown under Q2a.

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56	Peter	Chambers	David Lock Associates	The overall conclusions of the GBMHA Strategic Growth Study are very broad and high level, as are the areas of search. The Councils' Assessment methodology recognises that smaller parcels might perform differently against the NPPF purposes due to differing boundaries and assessment criteria. It is therefore agreed that the Council's own assessment be made, with the GBHMA study being examined as one of a number of evidence bases, as a later part in the process.	Comments noted.
63	Fiona	Lee-McQueen	Framptons	It is considered that the starting point for the Bromsgrove Green Belt Purposes Assessment should be the conclusions for the GBHMA Strategic Growth Study with a commentary, from a local perspective, on those findings. If there are circumstances whether the GBHMA Strategic Growth Study does not align with local objectives, these matters should be highlighted and justified at the early stages and therefore provide the evidence base for the local assessment.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.
65	Louise	Steele	Framptons	When the parcels from the GBHMA study are divided up to form the proposed parcels for the Bromsgrove District Study, it is likely that the smaller parcels might perform differently against the purposes. It is agreed that the two studies may come to different conclusions. It is agreed that the correct approach is to examine Bromsgrove's Green Belt against that Council's own "assessment criteria" as it may be that the Bromsgrove study does not concur with the GBHMA Strategic Growth Study.	Comments noted.
76	Emily	Vyse	GVA	We agree with the proposed relationship between the two assessments in so far as the Bromsgrove Review will not rely upon the findings of the broad approach taken in the SGS and shall instead consider the Green Belt against the District's own assessment criteria and in the local context. The acknowledgement that two studies may come to different conclusions about the strength of the Green Belt in the District is welcomed. It will be fundamental that this acknowledgement is carried forward through both parts of the District assessment so as to ensure sites are not disregarded unnecessarily.	Comments noted.
78	Sean	Rooney	Harris Lamb	The SGS is on a much larger scale than that which is envisaged for the District wide review. Substantial difference in scale means that the two assessments may not be directly comparable and so Bromsgrove should ensure it does not rely on the SGS too heavily.	Comment noted.
80	John	Pearce	Harris Lamb	The issue of scale means that the two assessments may not be directly comparable. However, the SGS is an evidence base document that the Council should have regard to when preparing its Local Plan so we would suggest that the findings of the Strategic Green Belt Review are considered at the outset to inform the Council's own more localised assessment.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.
82	Sean	Rooney	Harris Lamb	The SGS GB review was on much larger scale and therefore the two assessments may not be directly comparable and so Bromsgrove should ensure it does not rely too heavily on the SGS when undertaking its own, more targeted assessment.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.
83	Patrick	Downes	Harris Lamb	The issue of scale means that the two assessments may not be directly comparable. However, the SGS is an evidence base document that the Council should have regards to when preparing its Local Plan. Suggest that the findings of the SGS are considered at the outset to inform the Council's own more localised assessment.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.

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84	Patrick	Downes	Harris Lamb	This issue of scale means that the two assessments may not be directly comparable. Suggest that the findings of the Strategic Green Belt review are considered at the outset to inform the Council's own more localised assessment.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.
86	Rebecca	Anderson	Iceni Projects	The conclusions of the GBHMA Strategic Growth Study are high level and do not reflect the likely GB value of smaller sites.	Comment noted - the BDC methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District Green Belt functions against the Green Belt purposes, followed by more detailed review of specific sites at Part 2 of the assessment.
88	Abbie	Connelly	Lichfields	Consider that the GBHMA strategic Green Belt review is not robust in its approach to assessing Green belt purposes. Because of the scale of the parcels assessed it is necessary for Bromsgrove to undertake its own independent assessment of sites.	Comment noted - the BDC methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District Green Belt functions against the Green Belt purposes, followed by more detailed review of specific sites at Part 2 of the assessment.
90	Owen	Jones	LRM Planning	The Strategic Green Belt Review undertaken as part of the Greater Birmingham HMA Study is of little if any relevance in the context of the preparation of the Local Plan Review. Of necessity that was a high-level piece of work which requires refinement at a more local level.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.
91	Max	Plotnek	Maddox Planning	The suggested approach is supported, as it is considered that the correct approach is to examine Bromsgrove's Green Belt against the Council's own assessment criteria.	Comments noted.
98	Sally	Oldaker		Absolutely not - the Hearn study is a load of rubbish - don't bother with it!	Comment noted.
99	Mark	Dauncy	Pegasus	GBHMA Strategic Green Belt Review stresses the need for local Green Belt reviews to allow the identifications of smaller urban extensions. Rightly acknowledges that the two studies may come to different conclusions about the strength of the Green Belt. Agreed that the correct approach should be to firstly examine Bromsgrove's Green Belt against the Council's own assessment criteria and then test the potential development areas against the findings of the Strategic GB Review as a later process.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.
101	Richard	Peach		BDC should not entertain any lobbying from the housebuilding industry, such as the Hearn/Wood report. To include it in this exercise and to call it "evidence" is spurious: at best it is mischievous and at worse an attempt to invoke a nightmare scenario to make us ordinary people more likely to accept a lesser but still vast incursion into Bromsgrove's Green Belt.	Comments noted. The SGS is an independent study any accusations of development industry lobbying or mischievous behaviour should be substantiated with evidence. Information is provided in an open , honest and transparent manner in order to inform people on all the issues and information which the planning process has to balance .The District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options.
101	Richard	Peach		To accept the suggestion of 15,000 homes between Barnt Green and Alvechurch into this consultation with little more than a shrug throws a blanket of doubt over the whole process because we don't know how much veracity to afford or faith to put into any of the other information offered to us to justify the methodology of or process of reviewing the Green Belt.	Comment noted. Information is provided in an open, honest and transparent manner in order to inform people on all the issues and information which the planning process has to balance. The District Plan Review will be informed by an up to date evidence base including a District wide Green Belt Boundary Review and sustainability appraisal of future development options. It may not be possible to draw direct parallels between the SGS and the Bromsgrove two Green Belt Purposes Assessment as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures. Part 2 of the Green Belt Assessment will assess potential development sites against the purposes of the Green Belt; however this will be in combination with the assessment of other BDC devised site selection criteria in determining where sites may be considered suitable for development through allocation in the District Plan Review. In this context the Green Belt Assessment by itself will not rule any sites in or out of



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					consideration prior to the Part 2 process taking place.
107	John	Jowitt	PJ Planning	Yes, it is appropriate to be informed by the results of the larger strategic study, but to conduct a finer grain assessment at District level.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.
122	Michael	Davies	Savills	We agree with the sentiment in paragraph 2.32 that Bromsgrove's Green Belt should be examined against the Council's own assessment criteria, and use the GBHMA findings at a later part of the process.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.
123	Michael	Burrows	Savills	The Green Belt Purposes Assessment Methodology consultation document seeks to treat the GBHMA Strategic Growth Study and the proposed Bromsgrove District Green Belt Purposes Assessment separately, primarily due to the strategic nature of the GBHMA assessment and the (very) large parcel sizes tested. Paragraph 2.31 of the consultation document identifies that the largest parcel measures 6400ha and this contributes to the overall conclusions of the study being very broad. We agree with the sentiment in paragraph 2.32 that Bromsgrove District's Green Belt should be examined against BDC's own assessment criteria, and to use the GBHMA findings in a consistent and rigorous way at a later part of the process, because this would provide a more robust evidence base for informing the Local Plan.	Comment noted - the SGS has and will be considered further as BDC progresses the Plan Review; However it may not be possible to draw direct parallels between the two Green Belt assessments as they will have been carried out at a different spatial scale, as well as in some circumstances using different criteria or assessment measures.
134	David	Barnes	Star Planning	Will inevitably be overlap between BDC GB assessment and SGS GB review. The Council's assessment work, as advocated by my client, should be at a site level to be more accurate in determining the effect on GB policy and purposes compared to strategic or large parcels.	Comment noted - the BDC methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District Green Belt functions against the Green Belt purposes, followed by more detailed review of specific sites at Part 2 of the assessment.
161	Ian	Macpherson		Will be necessary to know how development needs will be accommodated from outside Bromsgrove.	Comment noted - BDC will continue to engage with neighbouring local authorities through the Duty to Cooperate, in order to address the issue of housing need in appropriate housing market areas.
185	Paul	Frost		Yes.	Comments noted.
194	Darren	Oakley	RPS	Very little guidance for local people, landowners or developers as to how identifying additional land for development will be achieved through the GB review. This appears to be left to future stages without any detail regarding the process to be followed. It is arguable whether the document provides sufficient clarity for consultees on the process BDC will follow in preparing a robust, credible evidence base to support alterations to Bromsgrove's GB.	Comment noted - the BDC methodology proposes, at Part 1 of the assessment, a strategic review of how the entire District Green Belt functions against the Green Belt purposes, followed by more detailed review of specific sites at Part 2 of the assessment.
<b>3a. Do you have any thoughts on the broad methodology for Part 2 of the Green Belt Purposes Assessment?</b>					
1	Tammy	Williams	Alvechurch Parish Council	The broad methodology should be used but sufficient regard must be given to community opinion and policies contained in adopted Neighbourhood Plans.	Public opinion is being used to guide the Local Plan Review through this and subsequent consultations. Any adopted Neighbourhood Plans will be a material consideration and carry some weight throughout the Local Plan Review process. With regard to the Green Belt Assessment this is a technical piece of evidence and a significant amount of professional judgement will be used against the methodology set out, including the Assessment Criteria which will ensure all areas of Green Belt are assessed in a consistent manner.
44	Kathryn	Ventham	Barton Willmore IM Land	Para.3.1 states further refinement of assessment criteria may be required - stakeholders should be able to comment on any refinement. Process for filtering which sites to take forward to Part 2 should be clarified. Welcome the proposed strategy for sites on the edge of the District so that approach takes into account geographical setting rather than administrative	Comments noted.

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				boundaries.	
28	Emily	Barker	Worcestershire County Council	WCC's sensitivity assessment of Land Cover Parcels would provide a useful measure to compare with the results of the proposed method.	Comments noted.
52	Tom	Ryan	Claremont Planning Bellway Homes	Essential that findings of Part 1 do not result in sites being overlooked on the periphery of large parcels when they could accommodate future development with minimal impact on the GB. Initial steps of part 2 process must avoid the dismissal of smaller land parcels due to identified constraints such as heritage assets or landscape features. The filtering process must not be too high level and must take into account options for development delivery and mitigation.	Sites will not be filtered out following Part 1.
52	Tom	Ryan	Claremont Planning Bellway Homes	Significant concern in relation to stage 4 of the Part 2 assessment that seems to require the demonstration of exceptional circumstances for the review of every potential GB site. The review of GB across Bromsgrove has been justified by failure to meet housing needs, including cross-boundary housing needs. Superfluous for individual exceptional circumstances to have to be demonstrated for every site.	To clarify it is not intended that every site at Stage 4 will be subject to demonstrate exceptional circumstances individually. The demonstration of existence of exceptional circumstances will take into account the objectively assessed housing need as well as reflect the strategy for growth in the District. This will focus on the proposed alteration of Green Belt boundaries as a whole. It is intended this piece of evidence will occur alongside Part 2 of the Green Belt Assessment, with the extent of proposed changes presented at the proposed options stage of the Local Plan Review for public consultation.
117	Darren	Oakley	RPS Group Messrs Wild, Johnson, McIntyre & Fisher	BDC must ensure that the release of GB sites in the Bromsgrove area and that altered GB boundaries have longevity into the future in line with paras 138-139 of the NPPF. The GBPA provides very little guidance as to how this will be achieved through the GB review. Appears to be left to future stages without any detail regarding the process to be followed.	Paragraphs 3.5 – 3.6 of the Draft Green Belt Methodology sets out how site boundaries will be defined, including the emphasis that any boundaries need to be strong and permanent.
161	Ian	Macpherson		Vague, should develop from the results of Stage 1.	Part 1 is to assess the performance of the Green Belt as a whole, providing as assessment on its role at a 'snapshot in time' which is expressed as best practice by PAS guidance. The results of Part 1 will inform the Part 2 assessments, however the methodology document acknowledges that small sites may perform differently to a larger parcel of land of which it sits within.
45	Kathryn	Ventham	Barton Willmore Taylor Wimpey	Para.3.1 states further refinement of assessment criteria may be required - stakeholders should be able to comment on any refinement.	Comments noted.
45	Kathryn	Ventham	Barton Willmore Taylor Wimpey	Process for filtering which sites to take forward to Part 2 should be clarified. It is not clear if all sites submitted through the Call for Sites will be assessed if free from constraints.	Sites will not be filtered out due to any outcomes of Part 1. Comments noted further consideration will be had to the process.
51	Gemma	Jenkinson	Claremont Planning Spitfire Bespoke Homes	<p>It is vital that the methodology of Part 2 of the assessment be effective and avoids the dismissal of suitable sites. The initial steps of this part of the process must avoid the dismissal of smaller land parcels due to identified constraints such as heritage assets or landscape features. Rather the assessment should consider whether mitigation is available to be delivered to reduce impact to an acceptable degree, using landscape buffers and contained development areas to ensure that no inappropriate impacts result. Therefore the filtering process identified must not be too high level and to be effective must take into account options for development delivery and mitigation.</p> <p>Significant concerns in relation to Stage 4 of the Part 2 Assessment that seems to require the demonstration of exceptional circumstances for the review of every potential Green belt site. Needs to be clarified as meaning that Green Belt Review across Bromsgrove has been justified through the failure to address identified housing needs and the initiation of the Local Plan review, across the cross boundary housing needs arising from the Birmingham HMA. Considered to be superfluous for individual exceptional</p>	<p>Sites will not be filtered out following the Part 1 assessment.</p> <p>To clarify it is not intended that every site at Stage 4 will be subject to demonstrate exceptional circumstances individually. The demonstration of existence of exceptional circumstances will take into account the objectively assessed housing need as well as reflect the strategy for growth in the District. This will focus on the proposed alteration of Green Belt boundaries as a whole. It is intended this piece of evidence will occur alongside Part 2 of the Green Belt Assessment and the Site Selection Methodology, with the extent of proposed changes presented at the proposed options stage of the Local Plan Review for public consultation.</p>

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				circumstances to have been demonstrated for every site.	
63	Fiona	Lee-McQueen	Framptons Bellway Homes	The Broad Methodology fails to set out how sites identified within the Site Selection process, as set out at stage 4 within the Site Selection Methodology, would then be included with the Part 2 Assessment.	Comments noted further consideration will be had to the filtering process.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	Essential that findings of Part 1 do not result in sites being overlooked on the periphery of large parcels when they could accommodate future development with minimal impact on the GB. Initial steps of part 2 process must avoid the dismissal of smaller land parcels due to identified constraints such as heritage assets or landscape features. The filtering process must not be too high level and must take into account options for development delivery and mitigation.	Sites will not be filtered out due to any outcomes of Part 1.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	Significant concern in relation to stage 4 of the Part 2 assessment that seems to require the demonstration of exceptional circumstances for the review of every potential GB site. The review of GB across Bromsgrove has been justified by failure to meet housing needs, including cross-boundary housing needs. Superfluous for individual exceptional circumstances to have to be demonstrated for every site.	To clarify it is not intended that every site at Stage 4 will be subject to demonstrate exceptional circumstances individually. The demonstration of existence of exceptional circumstances will take into account the objectively assessed housing need as well as reflect the strategy for growth in the District. This will focus on the proposed alteration of Green Belt boundaries as a whole. It is intended this piece of evidence will occur alongside Part 2 of the Green Belt Assessment, with the extent of proposed changes presented at the proposed options stage of the Local Plan Review for public consultation.
76	Emily	Vyse	GVA University of Birmingham	We broadly agree with the proposed broad methodology for Part 2 of the Assessment. To ensure the consideration of all land has been undertaken in an appropriate, transparent and measured way, it will be fundamental that all sites promoted to the District for release are considered in stage 2 under the same assessment criteria, including any sites which cross authoritative boundaries. Where this is the case, consideration should be undertaken with the relevant local planning authority.	The assessment criteria will be used for both Part 1 and 2. The Council will consider sites which cross authoritative boundaries and will be in discussion with neighbouring authorities at an early stage.
82	Sean	Rooney	Harris Lamb Stoke Prior Developments	In general agreement with methodology for Part 2, however object to need to revisit whether exceptional circumstances exist as this is established through Policy BDP3 of existing plan. Do not see it is necessary to reopen this debate as part of the Part 2 assessment.	Inclusion of exceptional circumstances needs to be considered to ensure previous exceptional circumstances remain or have not changed, as well as identify any further exceptional circumstances. This will ensure there is a robust justification for removal of land from the Green Belt.
90	Owen	Jones	LRM Planning Persimmon Homes	We agree that there will be differences in how parcels perform against the Green Belt Purposes at the strategic stage assessment in comparison with how individual sites in those parcels perform at the detailed assessment at stage 2. We note however the reference in para 3.3 that sites to be assessed will fit with the spatial strategy as it emerges as the District Plan Review progresses. The process of defining the spatial strategy will inevitably be informed by the findings of the Green Belt assessment; the risk otherwise is that a spatial strategy is alighted upon that causes a significant detrimental effect to the fundamental purpose of the Green Belt when there are alternative strategies available. Clearly an interaction between defining the spatial strategy and the GB assessment.	The Spatial Strategy will be informed by a number of different factors including comments from this consultation, SA and other evidence documents. The Green Belt Part 1 assessment will look at the status and 'health' of the Green Belt at a certain date. The spatial strategy will be used to determine the focus of where development might go, but will not determine specific sites, which is the process of the site selection through the BDP Review.
122	Michael	Davies	Savills Landowners	We agree with the broad methodology proposed. We particularly support the distinction that the report will not make recommendations as to which sites should be removed from the Green Belt, as the Call for Sites and site selection exercise will need to be used in collaboration to come to a conclusion. We note a typographical error within the document within paragraph 3.5, footnote 13. Here reference is made to NPPF (2012). We believe this should make reference to NPPF (2018).	Comments noted.
134	David	Barnes	Star Planning Richborough Estates	Consider that the more focused Part 2 assessment should be undertaken in preference to Part 1. Single assessment process should focus on GB sites at sustainable locations, such as Hagley and Barnt Green.	Part 1 is to assess the performance of the Green Belt as it is at a particular point or 'snapshot in time' which is expressed as best practice by PAS guidance. Sustainable areas will be identified through the site selection methodology and evidence base

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					and proposed as allocations in the emerging District Plan.
65	Louise	Steele	Framptons Summix Ltd	It is noted in section 3.6 that detailed site-specific assessments will consider opportunities to improve site boundaries, which is welcomed.	Comments noted.
153	Elizabeth	Mitchell	Mitchell Planning	The whole purpose of the GB review is eventually to release land as set out in the BDP so not looking positively at the potential for sustainable development and only looking at GB purposes may result in rejection of suitable land at an early stage unless at the next stage of assessment the development potential is scored more highly.	Sites will not be rejected solely on the Part 2 GB Assessment, but from looking at the site as a whole against the Site Selection Methodology, Spatial Strategy and other evidence which forms the evidence base for the District Plan.
83	Patrick	Downes	Harris Lamb Willowbrook Garden Centre	<p>In general agreement with the proposed methodology for Part 2, but query the need for Stage 4 where it proposes to re-open consideration of whether there are exceptional circumstances to justify release of Green Belt land. It is considered that exceptional circumstances were demonstrated when the Inspector examining the BDP found the Plan sound, subject to the Council undertaking an early review of the Plan. The adopted Plan is very clear that the Council cannot meet its needs in full without undertaking a review of the Green Belt. We do not see why it is necessary to reopen this debate. Nothing has changed in terms of meeting needs and as such the same exceptional circumstances that existed previously are still highly relevant.</p> <p>Furthermore, the need to accommodate an element of the West Midlands conurbation's housing need also constitutes an established exceptional circumstance.</p>	Inclusion of exceptional circumstances needs to be considered to ensure previous exceptional circumstances remain or have not changed, as well as identify any further exceptional circumstances. This will ensure there is a robust justification for removal of land from the Green Belt.
123	Michael	Burrows	Savills Landowners	We consider that the proposed methodology presents a logical approach to assessing the more detailed selection of sites put forward through the Call for Sites process. It is anticipated that all sites promoted around existing large settlements should be assessed as part of the process to ensure that there is a clear and transparent assessment of reasonable alternatives. Further thoughts on the approach that we consider should be taken to defining site boundaries are set out in response to question 3b. It is important that the report makes conclusions as to which sites could potentially be released for development based on the overall contribution of the site to the Green Belt, but it is recognised that other factors need to be taken into consideration in order to inform which sites will be removed from the Green Belt.	Comments noted. The Green Belt Purposes Assessment Part 2 will not propose which sites should be removed from the Green Belt and allocated for development, but from looking at the site as a whole against the Site Selection Methodology, Spatial Strategy and other evidence which forms the evidence base for the District Plan.
4	Barry	Spence	Bentley Pauncefoot Parish Council	The ability to seek alternative robust boundaries could potentially be used to enlarge development sites	Comments noted.
2	Gill	Lungley	Barnt Green Parish Council	Are broadly in agreement with the methodology for Part 2 of the assessment.	Comments noted
99	Mark	Dauncy	Pegasus Gallagher Estates	Unclear how the rating system is intended to work. No details are given as to whether individual scorings will be attributed to the strength of the contribution of each site to the 5 GB purposes and an amalgamated overall score. Requires further clarification.	The Green Belt purposes are afforded equal weight as Paragraph 134 of the NPPF does not state or infer that one purpose is more important than another. Assigning numeric 'scores' to the individual purposes for each of the parcels, to give an aggregate overall contribution will be avoided as this often result in misleading results.'
106	Phillip	Woodhams	Phillip Woodhams Billingham & Kite Ltd	The Council's documentation touches on what it considered to be the correct approach in its reference to the Calverton High Court judgement. That case echoes the requirements of law which is the requirement of the Planning and Compulsory Purchase Act 2004 which obliges planning authorities to seek the achievement of sustainable patterns of development.	To clarify it is not intended that every site at Stage 4 will be subject to demonstrate exceptional circumstances individually. The demonstration of existence of exceptional circumstances will take into account the objectively assessed housing need as well as reflect the strategy for growth in the District. This will focus on the proposed alteration of Green Belt boundaries as a whole. It is intended this piece of evidence will occur alongside Part 2 of the Green Belt Assessment, with the extent of proposed changes presented at the proposed options stage of the Local Plan Review for public consultation.

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84	Patrick	Downes	Harris Lamb Worcestershire Health and Care NHS Trust	Generally in agreement with proposed methodology for Part 2. Query the need for Stage 4. In our view, exceptional circumstances were demonstrated when the examining Inspector found the plan sound, only subject to the Council undertaking an early review of the Plan. Nothing has changed since the adoption of the BDP in terms of the Council having sufficient non Green Belt land to meet its needs. The same exceptional circumstances that existed previously are still highly relevant. The need to accommodate an element of the housing overspill from Birmingham City also constituted an established exceptional circumstance."	To clarify it is not intended that every site at Stage 4 will be subject to demonstrate exceptional circumstances individually. The demonstration of existence of exceptional circumstances will take into account the objectively assessed housing need as well as reflect the strategy for growth in the District. This will focus on the proposed alteration of Green Belt boundaries as a whole. Inclusion of exceptional circumstances needs to be considered to ensure previous exceptional circumstances remain or have not changed, as well as identify any further exceptional circumstances. This will ensure there is a robust justification for removal of land from the Green Belt.
56	Peter	Chambers	David Lock Associates Birmingham Property Services	The inclusion of Part 2 assessment is supported. This will allow sites submitted through the Site Selection process to be reviewed as set out in paras 3.5 to 3.8. Importantly, Stage 3 of the process will allow other factors to be taken into account as well as GB considerations in order to inform the council's spatial strategy for development.	Comments noted.
185	Paul	Frost		Broad methodology seems robust	Comments noted.
80	John	Pearce	Harris Lamb Bloor Homes	Generally in agreement with the proposed methodology for Part 2.	Comments noted.
80	John	Pearce	Harris Lamb Bloor Homes	Object to the need to revisit whether exceptional circumstances exist in order to justify amendments to the GB through the GB review. In our view, exceptional circumstances were demonstrated when the Inspector examining the BDP found the Plan sound, only subject to the Council undertaking a review of the Plan by 2023 to include a full carrying out of a full GB review. Furthermore, the level of unmet housing need arising across the wider HMA is also considered to contribute to the Exceptional Circumstance case and the need to release GB to help meet this. As such, the exceptional circumstances that existed previously are still highly relevant.	To clarify it is not intended that every site at Stage 4 will be subject to demonstrate exceptional circumstances individually. The demonstration of existence of exceptional circumstances will take into account the objectively assessed housing need as well as reflect the strategy for growth in the District. This will focus on the proposed alteration of Green Belt boundaries as a whole. Inclusion of exceptional circumstances needs to be considered to ensure previous exceptional circumstances remain or have not changed, as well as identify any further exceptional circumstances. This will ensure there is a robust argument for removal of land from the Green Belt.
88	Abbie	Connelly	Lichfields Taylor Wimpey Strategic Land	Concerned that the Part 2 methodology is insufficiently detailed. As a result, additional information and further assessment criteria will be required to ensure that an appropriately detailed assessment of the selected strategic parcels can be undertaken.	Strategic parcels will not be assessed at Part 2. Part 2 will assess individual sites suggested to the Council and those identified from other parts of the evidence base.
78	Sean	Rooney	Harris Lamb Barratt Homes	Generally in agreement although query the need for Stage 4, where it proposes to re-open consideration of whether there are exceptional circumstances to justify the release from land in the GB. Do not see why it is necessary as part of the Part 2 assessment to reopen this debate, the same exceptional circumstances are still highly relevant.	To clarify it is not intended that every site at Stage 4 will be subject to demonstrate exceptional circumstances individually. The demonstration of existence of exceptional circumstances will take into account the objectively assessed housing need as well as reflect the strategy for growth in the District. This will focus on the proposed alteration of Green Belt boundaries as a whole. Inclusion of exceptional circumstances needs to be considered to ensure previous exceptional circumstances remain or have not changed, as well as identify any further exceptional circumstances. This will ensure there is a robust justification for removal of land from the Green Belt.
119	Darren	Oakley	RPS Group Gleeson	Para 4.3 states ' <i>It is envisaged that the process for Part 2 of the assessment will be outlined in more detail as the GB Assessment moves forward</i> '. Whilst this may help sign-off the GBPA document for consultation, it is arguable whether it provides sufficient clarity for consultees on the process the Council will follow in preparing a robust, credible evidence base to support alterations to Bromsgrove's GB. There is very little guidance for local people, landowners or developers as to how this will be achieved through the GB review. This appears to be left to future stages without any detail regarding the process to be followed.	Part 1 of the Green Belt Assessment will inform Part 2 through practical application, and will allow for further changes to the methodology which will be set out for consultation again. This is to ensure any issues with the current methodology are found in Part 1 and rectified before moving onto Part 2.
54	Katherine	Else	Claremont Planning Miller Homes	To ensure that Part 2 Assessment Phase is effective, the initial steps of this part of the process must avoid the dismissal of smaller land parcels due to	Sites will not be rejected solely on the Part 2 Green Belt Assessment, but from looking at the site as a whole against the Site Selection Methodology, Spatial

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				<p>identified constraints such as heritage assets/landscape features. The assessment should consider whether mitigation is available to be delivered to reduce impact to an acceptable degree, using landscape buffers and contained development areas. The filtering process identified must not be too high level and to be effective must take into account options for development delivery and mitigation.</p> <p>Also raise significant concerns in relation to stage 4 of the Part 2 Assent that seems to require the demonstration of exceptional circumstances for the review of every potential Green Belt site. Considered to be superfluous for individual exceptional circumstances to have to be demonstrated for every site.</p>	<p>Strategy and other evidence which forms the evidence base for the District Plan.</p> <p>To clarify it is not intended that every site at Stage 4 will be subject to demonstrate exceptional circumstances individually. The demonstration of existence of exceptional circumstances will take into account the objectively assessed housing need as well as reflect the strategy for growth in the District. This will focus on the proposed alteration of Green Belt boundaries as a whole. Inclusion of exceptional circumstances needs to be considered to ensure previous exceptional circumstances remain or have not changed, as well as identify any further exceptional circumstances. This will ensure there is a robust justification for removal of land from the Green Belt.</p>
137	Matthew	Fox	Turley Redrow Homes	It is important the Green Belt Assessments does not try and identify exceptional circumstances (currently referred to as Stage 4). This needs to be considered completely independently of the GBA.	The demonstration of existence of exceptional circumstances will take into account the objectively assessed housing need as well as reflect the strategy for growth in the District. This will focus on the proposed alteration of Green Belt boundaries as a whole
64	Peter	Frampton	Framptons Mr I Rowlesge	For reasons stated above the part 2 GBPA should not exclude consideration of individual sites within strategic parcels, where a strong continuing role has been identified against the underlying purposes of the GB.	Sites will not be rejected solely on the Part 2 Green Belt Assessment, but from looking at the site as a whole against the Site Selection Methodology, Spatial Strategy and other evidence which forms the evidence base for the District Plan.
<b>3b. Do you have any views on what the Council should be considering when it is looking to define Green Belt boundaries for specific sites?</b>					
1	Tammy	Williams	Alvechurch Parish Council	In addition to what is in paragraphs 3.5 to 3.8, conservation areas, heritage assets and flood areas should be taken into account, as well as full regard given to historic landscape features, hedgerows and tree lines.	Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent.
2	Gill	Lungley	Barnt Green Parish Council	Support considering the 5 matters from the ruling in Calverton PC v Greater Nottingham Councils 2015.	Comments noted.
4	Barry	Spence	Bentley Pauncefoot Parish Council	Should consider traffic, public service provision and ecology when looking to define Green Belt boundaries for sites.	Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent. While roads are considered to be strong boundaries; traffic, public service provision and ecological designations don't necessarily provide clear physical boundaries on the ground and these boundaries often change over time. They are therefore unlikely to be considered appropriate for defining Green Belt boundaries for sites. However, as part of the Site Selection process and in Part 2 of the Green Belt Purposes Assessment, environmental designations will be taken into account alongside various other constraints. Accessibility and social infrastructure such as public service provision will also be taken into account.
8	Nancy	Bailey	Frankley Parish Council	Strong boundaries should be retained in order to prevent sprawl	Comments noted. The NPPF sets out the purposes of Green Belt, one of these is to check the unrestricted sprawl of large built-up areas. Officers will seek to define strong Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent.
43	Mark	Sitch	Barton Willmore The Church Commissioners for England	Established vegetation and roads should form part of the assessment in identifying GB boundaries. Support the need for strong defensible boundaries.	Comments noted. Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent. Established vegetation and roads will be considered when looking to define Green Belt boundaries.
44	Kathryn	Ventham	Barton Willmore IM Land	Consider paragraph 3.5 is incorrect and that established tree lines/hedgerows can form defensible boundaries. These can be strengthened as part of any application process.	Comments noted. In addition to natural boundaries such as rivers, streams and woodland, it is agreed/acknowledged that some treelines and hedgerows could be robust enough to form suitable boundaries, particularly if they are protected trees/hedgerows. In Stage 2 of Part 2 of the Green Belt Purposes Assessment, opportunities to improve and strengthen site boundaries will be considered.
48	Grace	Allen	CBRE Arden Park	When defining boundaries for specific sites, advantages should be taken of natural boundaries such as watercourses, trees and hedgerows. In addition	Agreed. In addition to built features, which include roads and railways, some natural boundaries such as rivers, streams and woodland are considered to be readily

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			Properties	to this, where there are immovable boundaries such as major roads and railways, these will provide for strong, permanent and defensible Green Belt boundaries.	recognisable and likely to be permanent and therefore make suitable boundaries in line with paragraph 139 of the NPPF. It is acknowledged that some treelines and hedgerows could be robust enough to form suitable boundaries, particularly if they are protected trees/hedgerows.
51	Gemma	Jenkinson	Claremont Planning Spitfire Bespoke Homes	Council should rely on natural boundaries as well as harder physical boundaries. Natural boundaries are protected through the development process and often result in a softer boundary than some harsher more physical features.	Comments noted. Some natural boundaries such as rivers, streams and woodland are considered to be readily recognisable and likely to be permanent and therefore make suitable boundaries in line with paragraph 139 of the NPPF. It is acknowledged that some treelines and hedgerows could be robust enough to form suitable boundaries, particularly if they are protected trees/hedgerows. Natural boundaries are not always protected during the development process.
52	Tom	Ryan	Claremont Planning Bellway Homes	Should rely on natural boundaries as well as harder physical boundaries. Whilst it is stated that cannot rely on trees and hedges to remain, they are protected through the development process and often result in a softer boundary than features such as roads and railways.	Comments noted. Some natural boundaries such as rivers, streams and woodland are considered to be readily recognisable and likely to be permanent and therefore make suitable boundaries in line with paragraph 139 of the NPPF. It is acknowledged that some treelines and hedgerows could be robust enough to form suitable boundaries, particularly if they are protected trees/hedgerows. Trees and hedges are not always protected during the development process.
53	Gemma	Jackson	Claremont Planning Mactaggart & Mickel Group	Should rely on natural boundaries as well as harder physical boundaries. Whilst it is stated that cannot rely on trees and hedges to remain, they are protected through the development process and often result in a softer boundary than features such as roads and railways.	"Comments noted. Some natural boundaries such as rivers, streams and woodland are considered to be readily recognisable and likely to be permanent and therefore make suitable boundaries in line with paragraph 139 of the NPPF. It is acknowledged that some treelines and hedgerows could be robust enough to form suitable boundaries, particularly if they are protected trees/hedgerows. Trees and hedges are not always protected during the development process.
54	Katherine	Else	Claremont Planning Miller Homes	Should rely on natural boundaries as well as hard boundaries. Hedges and trees are protected through the development process and often result in a softer boundary.	Comments noted. Some natural boundaries such as rivers, streams and woodland are considered to be readily recognisable and likely to be permanent and therefore make suitable boundaries in line with paragraph 139 of the NPPF. It is acknowledged that some treelines and hedgerows could be robust enough to form suitable boundaries, particularly if they are protected trees/hedgerows. Trees and hedges are not always protected during the development process.
63	Fiona	Lee-McQueen	Framptons Bellway Homes	Bromsgrove District Council should follow the requirements as set out at paragraphs 138 and 139 of the NPPF (2018).	Agreed. Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent.
65	Louise	Steele	Framptons Summix Ltd	Consideration should be afforded to the opportunity to link with, strengthen and enhance existing local features when defining Green Belt boundaries for specific sites. This should be linked to feedback set out in response to question 2h, including improvement to Green Infrastructure Networks and linking existing communities with the Green Belt and wider countryside.	As part of the site selection work and in Stage 2 of Part 2 of the Green Belt Purposes Assessment consideration will be given to opportunities to link to nearby features and improve and strengthen site boundaries, for instance by incorporating an area of existing development.
76	Emily	Vyse	GVA University of Birmingham	The consultation document sets out that a robust boundary will make a stronger contribution to preventing urban sprawl and in listing features that would define such a boundary, it includes roads, railways, canals, the edge of settlements, rivers, streams and woodland. We agree that these would form strong defensible boundaries but consider that roads should not be limited to only major roads and that field boundaries and hedgerows could also form strong boundaries where they are clearly established and defined. The topography of land could also, in some circumstances, be seen to provide a strong boundary.	Comments noted. When assessing potential boundaries, consideration will be given to all roads, not just major roads. In addition to natural boundaries such as rivers, streams and woodland, it is acknowledged that some field boundaries and hedgerows could be robust enough to form suitable boundaries, particularly if the hedgerow is protected under The Hedgerows Regulations.
78	Sean	Rooney	Harris Lamb Barratt Homes	Boundaries that are likely to be permanent can be defined through additional planting or the implementation of structural landscaping.	In Stage 2 of Part 2 of the Green Belt Purposes Assessment, opportunities to improve site boundaries will be explored.
80	John	Pearce	Harris Lamb Bloor Homes	The Council should use boundaries that are likely to be permanent or can be made to be more permanent through additional planting or implementation of structural landscaping for example.	Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent. In Stage 2 of Part 2 of the Green Belt Purposes Assessment, opportunities to improve site boundaries will be explored.



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82	Sean	Rooney	Harris Lamb Stoke Prior Developments	No specific views over and above guidance in NPPF #139. Suggested that boundaries that are likely to be permanent can be defined through additional planting or structural landscaping.	Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent.
83	Patrick	Downes	Harris Lamb Willowbrook Garden Centre	The Council should be considering the guidance in NPPF para 139 (f).  Boundaries should be used that are likely to be permanent or can be made to be more permanent through additional planting or implementation of structural landscaping, for example.	Agreed. Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent. In Stage 2 of Part 2 of the Green Belt Purposes Assessment, opportunities to improve site boundaries will be explored.
84	Patrick	Downes	Harris Lamb Worcestershire Health and Care NHS Trust	Should consider guidance in NPPF Para 139 which states that when defining boundaries, should use features that are readily recognisable and likely to be permanent.	Agreed. Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent.
88	Abbie	Connelly	Lichfields Taylor Wimpey Strategic Land	Particular consideration should be given to sites which have long term defensible boundaries and benefit from physical features that are readily recognisable and likely to be permanent.	Agreed. Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent.
91	Max	Plotnek	Maddox Planning David Goldstein	The Council should be considering more permanent boundaries (such as roads, railways, canals, the edges of settlements etc.) as appropriate boundaries for specific sites within the Green Belt. Emphasis should be placed on the importance of permanent boundaries such as motorways in containing urban sprawl.	Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent. The NPPF sets out the purposes of Green Belt, one of these is to check the unrestricted sprawl of large built-up areas. It is agreed that motorways can provide a robust physical boundary.
99	Mark	Dauncy	Pegasus Gallagher Estates	Also important to recognise that defensible GB boundaries may evolve through the master planning of strategic sites.	Site boundaries will be considered in Part 2, Stage 2 of the Green Belt Purposes Assessment and at this stage, consideration will be given to boundaries that are present on the site at the time of the assessment. Opportunities to improve existing site boundaries will also be explored at this stage.
107	John	Jowitt	PJ Planning Bromsgrove Golf Course	The Council should consider appropriate, permanent defensible boundaries that permit the protection of the wider Green Belt beyond the sites. This should not be restricted to transport corridors, but should consider the full range of potential boundary features, including topographic features.	Comments noted. Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent.
110	Gareth	Sibley	RCA Regeneration Duchy Homes	As individual sites are further assessed, we also encourage the consideration of potential softer boundaries such as the edges of areas that could be designated as areas of Green Infrastructure. This is because in design terms, hard edges to development are not necessarily desirable on the ground.	There may be instances where a softer boundary could be appropriate and form part of the Green infrastructure network, but this is a site specific issue, and while some consideration will be given to this during the site selection work, it is something that would be addressed at master planning stage, possibly with input from the Green Infrastructure Partnership.
111	Gareth	Sibley	RCA Regeneration Mr and Mrs Watson	As individual sites are further assessed, we also encourage the consideration of potential softer boundaries such as the edges of areas that could be designated as areas of Green Infrastructure. This is because in design terms, hard edges to development are not necessarily desirable on the ground.	There may be instances where a softer boundary could be appropriate and form part of the green infrastructure network, but this is a site specific issue, and while some consideration will be given to this during the site selection work, it is something that would be addressed at master planning stage, possibly with input from the Green Infrastructure Partnership.
115	John	Breese	Rosconn Strategic Land	RSL consider that boundaries such as hedgerow/tree lines can make appropriate and durable site boundaries. The durability of hedgerows as a boundary should not be underestimated, with some dating back hundreds of years to the various Enclosures Acts which date far beyond other more modern features. There are also now Hedgerow Regulations that affordable protection to any hedgerow which has existed for 30 years or more preventing unnecessary damage whilst retaining the opportunity to improve hedgerow/tree line boundaries through appropriate maintenance and additional planting.	Comments noted. In addition to the natural boundaries identified in paragraph 3.5, it is agreed/acknowledged that some treelines and hedgerows could be robust enough to form suitable boundaries, particularly if they are protected trees/hedgerows.
122	Michael	Davies	Savills Landowners	When looking to define the Green Belt boundaries for specific sites, BDC should consider paragraph 139 of NPPF (2018) which sets out how Green Belt boundaries should be drawn up. A key consideration is to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan	Agreed. Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent.



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				period; and define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.	
123	Michael	Burrows	Savills Landowners	When looking to define the Green Belt boundaries for specific sites, BDC should consider paragraph 139 of NPPF (2018) which sets out how Green Belt boundaries should be drawn up. A key consideration is to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and to define boundaries clearly, using physical features that are readily recognisable and likely to be permanent. We consider that BDC should also take into account the ability for the contribution made by existing physical features that define site boundaries (such as field boundaries and hedgerows) to be enhanced and bolstered to further demark the edge of the Green Belt boundary.	Agreed. Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent. It is agreed that existing features that define site boundaries including treelines and hedgerows could be robust enough to form suitable boundaries, particularly if they are protected trees/hedgerows and in Stage 2 of Part 2 of the Green Belt Purposes Assessment, opportunities to improve and enhance these existing site boundaries will be explored.
161	Ian	Macpherson		GB Boundary should not be defined by the sites put forward. Should be established with permanent boundaries.	Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent. The sites put forward (through the Call for Sites Process) and those identified through other parts of the evidence base will be filtered to produce a shortlist of sites (Part 2, Stage 1 of the Green Belt Purposes Assessment), which will then be reassessed in a similar way to the Part 1 assessment, but in more detail. Questions concerning the permanence of site boundaries will be addressed at this stage.
185	Paul	Frost		Boundaries should be drawn using strong physical features	Agreed. Officers will seek to define Green Belt boundaries in accordance with NPPF paragraph 139, using physical features that are readily recognisable and likely to be permanent.
<b>3c. Do you agree that it is important to consider the additional positive benefits that sites within the Green Belt play at this stage of the study?</b>					
1	Tammy	Williams	Alvechurch Parish Council	Yes, but the overall feeling is that land should only be released if exceptional circumstances exist and to benefit identified and proven local need.	Agreed Green Belt land will only be released in exceptional circumstances.
44	Kathryn	Ventham	Barton Willmore OBO IM Land	Agree it is important to consider additional positive benefits but note that benefits such as Public Rights of Way etc. can be utilised and enhanced by development proposals.	Comments noted.
52	Tom	Ryan	Claremont Planning OBH Bellway Homes	All features of the GB, positive and negative, should be assessed at this stage of the study. However concern over larger parcels as elements such as public access, outdoor sport/recreation, landscapes, visual amenity, biodiversity and damaged/derelict land may be important however other parts of a parcel may not incorporate any such features	Comments noted. It is agreed that the parcels presented are large, however due to the nature of Part 1 of the Green Belt Assessment it is necessary they are of this size. The purpose of Part 1 is to consider the District in its entirety and how the Green Belt performs against the defined Green Belt purposes.
138	Charles	Robinson	Twelvetwentyone	Yes. Potential for areas of Green Belt to contribute to wider community needs is an important consideration.	Comments noted.
63	Fiona	Lee-McQueen	Framptons OBO Bellway Homes	No, with reference to NPPF #141. Therefore it is after that stage, i.e. once green belts have been defined, when additional positive benefits are taken into account. At this stage the exercise is solely focussed on the 5 purposes of the Green Belt.	Comments noted. We will initially be assessing how the Green Belt performs against the defined Green Belt purposes. The site selection process will go into more site specific information and detail of individual parts of the parcel including positive and negative features.
76	Emily	Vyse	GVA OBO University of Birmingham	As set out in our response to question 2h, the consideration of additional positive benefits that sites within the Green Belt play, should be considered after boundaries have been defined. Where opportunities for positive benefits are noted during the two part assessment process, it would be appropriate to note these down in the commentary, but we consider that the focus should be on reviewing the Green Belt to identify areas which make a lesser contribution to the purposes and could therefore be released for development.	Comments noted. We will initially be assessing how the Green Belt performs against the defined Green Belt purposes. The site selection process will go into more site specific information and detail of individual parts of the parcel including positive and negative features.
82	Sean	Rooney	Harris Lamb OBO Stoke Prior	Sites proposed to be removed from GB and benefits they can deliver should be assessed as part of the overall planning balance in deciding which sites	Comments noted. The purpose of the assessment is to consider how the Green Belt functions against the purposes at a certain point in time. The site selection process

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			Developments	are proposed to be removed. This exercise should be undertaken once the GB assessment is complete and should not form part of the assessment.	will go into more site specific information and detail of individual parts of the parcel including positive and negative features.
107	John	Jowitt	PJ Planning OBO Bromsgrove Golf Club	It is important to consider the additional positive benefits provided by Green Belt sites, but it is equally important to consider the potential to achieve positive benefits by releasing sites from the Green Belt, for example through facilitating access to the countryside in association with sustainable development activity where private agricultural and other land on the urban fringe is inaccessible and delivering relatively low public/green infrastructure benefits.	Comments noted.
122	Michael	Davies	Savills OBO Landowners	Yes, this is good to establish from an early stage. Guidance in the NPPF (2018) related to Green Belt should be used as a basis. However additional information such as the deliverability of individual sites should be considered when deciding to release land from the Green Belt.	Comments noted.
65	Louise	Steele	Framptons OBO Summix Ltd	Yes, this is agreed, especially in regard to the issues identified in response to question 2h.	Comments noted.
83	Patrick	Downs	Harris Lamb OBO Willowbrook Garden Centre	No. These are not Green Belt concerns and should be kept separate from the consideration of which sites should or should not come out of the Green Belt. This exercise should be undertaken once the Green Belt assessment and review is complete and should not form part of the assessment.	Comments noted. The purpose of the assessment is to consider how the Green Belt functions against the purposes at a certain point in time. The site selection process will go into more site specific information and detail of individual parts of the parcel including positive and negative features.
123	Michael	Burrows	Savills OBO Landowners	It is useful to consider the positive benefits that deliverable and viable sites currently located within the Green Belt can make to boosting the market and affordable housing land supply for the District at this stage of the study. However the primary purpose of the study should be to allow conclusions to be drawn on the overall contribution of the site to the Green Belt and, conversely, the harm to the Green Belt that the site would cause if de-designated and hence potentially released for development.	Comments noted.
4	Barry	Spence	Bentley Pauncefoot PC	Agrees that it is important to consider the additional positive benefits that sites within the Green Belt play at this stage of the study.	Comments noted.
43	Mark	Stictch	Barton Willmore OBO The Church Commissioners England	Support the assessment of GB sites against positive benefits including public access, provision of outdoor sports & recreation, landscape, visual amenity & biodiversity & dereliction.	Comments noted.
2	Gill	Lungley	Barnt Green PC	Yes – support enhancing the benefits of the Green Belt.	Comments noted.
99	Mark	Dauncey	Pegasus OBO Gallagher Estates	Considered important to recognise the additional positive benefits may be brought about through allocation of the site for development - eg: enhanced public access, opportunities for outdoor & sport recreation, retention and enhancement of landscapes. Factors should be taken into account in overall assessment.	Comments noted.
48	Grace	Allen	CBRE OBO Arden Park Properties	Whilst it is important to plan positively to enhance the beneficial use of GB, we understand that this is not the purpose of the assessment. Therefore, this is not an important factor to consider at this time.	Comments noted.
84	Patrick	Downes	Harris Lamb Worcestershire Health & Care NHS Trust	No. These are not Green Belt concerns and should not be kept separate to the consideration of which sites should/should not come out of the Green Belt.	Comments noted.
185	Paul	Frost		Yes.	Comments noted.
80	John	Pearce	Harris Lamb OBO Bloor Homes	The Council will need to assess the sites it is proposing to remove from the GB, and the benefits they can deliver as part of the overall balancing exercise, when deciding which are to be proposed for removal from the GB.	Comments noted.

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				Whilst these benefits could arise if the site were not developed, the whole purpose of the assessment is to identify sites for development to meet the Council's housing needs. As such, if the site is removed from the GB and allocated for development these perceived benefits will not arise so we query what purpose they should have in the overall assessment.	
88	Abbie	Connelly	Lichfields OBO Taylor Wimpey	Focus of the consultation document should be on the contribution of the assessment parcels to main GB purposes. Whilst the potential to enhance the contribution made by individual parcels to health and wellbeing, this is not a primary role of the Green Belt, and the matters should not be conflated. The assessment methodology should recognise the importance of assessing the sustainability credentials of individual sites in relation to: 1) Accessibility to public transport, walking and cycling 2) Proximity to services including shops, schools, healthcare and recreation.	Comments noted.
86	Rebecca	Anderson	Iceni Projects OBO Generator Developments	No, we considered this should be saved for the site selection process otherwise there is potential for 'double counting' of benefits in the allocation process.	Comments noted. For clarity no scoring will be assigned to sites during the assessment process.
98	Sally	Oldaker		Yes, at all stages.	Comments noted.
78	Sean	Rooney	Harris Lamb OBO Barrett Homes	Additional benefits of GB sites are not considered relevant to the purposes of the GB review. These concerns should be kept separate to the consideration of which sites should or should not be released from the Green Belt.	Comments noted.
54	Katherine	Else	Claremont Planning OBO Miller Homes	All features of the Green belt positive and negative should be assessed at this stage to ensure a robust and impartial assessment. However, have reservations over the implications of the size of land parcels being assessed.	Comments noted.

Respondent	Summary of Response to Site Selection Methodology	Main points to address	Officer Response/Proposed Amendment to Site Selection Methodology
Mark Davies Environment Agency	<p>We would advise that sites are assessed using relevant environmental constraints, e.g. flood risk, source protection zone (groundwater risk), landfill sites. Latest datasets are available from the EA's datashare website. Happy to discuss key issues, assessments etc necessary to inform the appropriateness and deliverability of specific sites, along with opportunities for environmental enhancement.</p> <p>Would advise that the hard constraints include Flood Zone 3 and 2 (FZ2 being an initial proxy for the fluvial 1% climate change event).</p> <p>Flood zone maps are a starting point and it should be noted that some sites which appear to be in FZ1 may in fact be at high risk of flooding. FZ1 only includes watercourses with a catchment of 3km squared and doesn't include un-modelled ordinary watercourses for example. Advised to discuss other sources of flooding, e.g. surface water (pluvial) flooding with drainage team at the LLFA.</p> <p>Would normally advise local plans to consider Source Protection Zone (SPZ) 1 as a sensitive groundwater constraint.</p> <p>The deliverability element will also be informed by environmental infrastructure availability and appropriateness, e.g. whether wastewater options are available for development to connect to, or upgrades can be brought forward in sufficient time - your WCS will</p>	<ul style="list-style-type: none"> <li>- Flood Zones 3 and 2 include hard constraints?</li> <li>- Source Protection Zone as a constraint?</li> <li>- Environmental Infrastructure availability &amp; appropriateness as a soft constraint?</li> </ul>	<p>Flood Zones 3a and 2 are identified under soft constraints and it is considered that this is consistent with national planning policy. Agree that the data source should be amended to "Environment Agency Mapping"</p> <p>Include Source Protection Zone 1 in Table 3. The mapping shows that there are a number of SPZ1's within the District.</p> <p>Consider that environmental infrastructure availability would be addressed through the SA mitigation measures process.</p>

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	inform this.		
Frankley Parish Council	Disused derelict land including brownfield land must be utilised before removing any land from the GB.		Noted and agreed in line with national guidance.
Hagley Parish Council	List of constraints is incomplete: Valued Landscapes - BDC should reapply the designations in the Worcestershire Structure Plan 2003 (AGLV) or its own 2004 LPA, or should commission its own report on which are valued landscapes. Access	Include Valued Landscapes and Access within the constraints list?  (N.b. We need to consider how we identify our most valued landscapes through the evidence base work)	Further work is to be undertaken on landscape character assessment and sensitivity as part of the evidence base work.  It is considered that this will help to inform site selection but could not be considered as an absolute constraint and should be balanced against mitigation measures following landscape sensitivity assessment and used to inform the overall development strategy.
Historic England	Contents of Tables 2 and 3 are noted. The tables' text specifically relates to the heritage asset and does not include reference to setting. This should be clarified for avoidance of doubt. Advice on the setting of heritage assets is available in HE Good Practice Advice in Planning Note 3  Tables focus on constraints. It is not clear how opportunities for enhancement are considered, such as opportunities for heritage at risk.  In terms of site selection. HE advocates the 5 step assessment process set out in HE Advice Note 3: Site Allocations in Local Plans  Table 3 'Other non-designated Heritage Assets' should	Include reference to heritage asset's setting?  Opportunities for enhancement?	Include a new paragraph at 3.7 "Opportunities for Enhancement."  Include reference at Table 3 under "Other Non- Designated Heritage Assets" – Legislation Affording Protection column, "NPPF footnote 55."  HE Advice Note 3 will be used as part of the Site Selection process as well as in decision making through the planning application process.

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	<p>also refer to NPPF footnote 55</p> <p>Site allocations that come forward through the Plan process will be expected to demonstrate how the historic environment has influenced the choice of sites and set out detailed overriding justification if it proposes the allocation of any sites that would have an adverse impact of heritage assets</p>		
Natural England	<p>Table 2: Identified Hard Constraints - in the Natural Assets section in relation to SSSI column, the Legislation affording protection should also refer to the Countryside and Rights of Way Act 2000 (CROW Act)</p> <p>Recommend that Local Sites are included as a hard constraint. The NPPF required plans to recognise a hierarchy of site designations. Local Sites are an important step on that hierarchy, and should be given protection commensurate with their status. See NPPF Para 70 and 171</p> <p>Would welcome Public Open Space as a Hard Constraint</p> <p>Suggest Landscape Character/Sensitivity in included as a Soft Constraint</p> <p>Suggest other biodiversity assets including ecological networks and strategic/landscape scale conservation included as Soft Constraints</p> <p>Suggest Green Infrastructure assets and connections included as Soft Constraints</p>	<p>Include Local Sites as a hard constraint (NPPF paras 70/171)?</p> <p>Public Open Space as a hard constraint?</p> <p>Landscape character/sensitivity as a soft constraint?</p> <p>Ecological networks as a soft constraint?</p> <p>Green infrastructure assets as a soft constraint?</p> <p>Geodiversity as a soft constraint?</p> <p>Best and Most Versatile Agricultural Land as a soft constraint?</p>	<p>Noted and agreed. Include the CROW Act (2000) in the legislation column of Table 3 for Natural Assets.</p> <p>Further work is to be undertaken on landscape character assessment as part of the evidence base work. It is considered that this will help to inform site selection but could not be considered as an absolute constraint and should be balanced against mitigation measures following landscape sensitivity assessment and used to inform the overall development strategy.</p> <p>Green Infrastructure Assets are to be identified as part of GI Concept Plans for Master Planning, not as part of the site selection process. Should be designed into the master planning process.</p>

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	<p>Suggest Geodiversity included as a Soft Constraint</p> <p>Suggest Best and Most Versatile Agricultural Land included as a Soft Constraint</p>		<p>Geodiversity will fall within Landscape Character Assessment.</p> <p>Include Best and Most Versatile Agricultural Land within the soft constraints table in accordance with footnote 53, NPPF, which states “where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land be preferred to those of higher quality.”</p>
North Worcestershire Water Management	<p>Areas entirely in Flood Zone 3 should not be considered in the call for sites.</p> <p>Call for sites - The Environment Agency's long term flood risk website should be used as it illustrates flooding from surface water and reservoirs as well as from watercourse and the sea.</p> <p>Call for sites - A site would not be ruled out where a watercourse is present.</p> <p>Call for sites - Where a watercourse is culverted or canalised, naturalisation and betterment would be sought.</p>	<ul style="list-style-type: none"> <li>- Flood Zone 3 as a hard constraint?</li> <li>- Opportunities for betterment of watercourses?</li> </ul>	<p>These comments are helpful. Flood Zone 3a is included as a soft constraint. The long term flood risk website will be used in the desk top assessments.</p> <p>Local Plan Policy will include requirements relating to betterment for new development.</p>
Sport England	<p>Agree that outdoor sports facilities should be recognised as a constraint to development and has no objections to categorising this as a soft constraint, subject to the relevant test for the loss of playing fields being that set out in NPPF #97 and Sport England's playing fields policy. The rating of constraints in respect of playing fields is</p>	<ul style="list-style-type: none"> <li>- Need to apply paragraph 97, NPPF</li> </ul>	<p>Comments are noted and agreed. Include NPPF Paragraph 97 in the legislation column of Table 3.</p>

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	only considered acceptable where NPPF #97 is applied fully in reaching any judgement.		
Worcestershire Wildlife Trust	Generally welcome the Site Selection Methodology. Strongly recommend adding Local Wildlife Sites (LWS) to the hard constraints list at Table 2. LWS include BAP/NERC S41 habitats/species which are fundamental building blocks in ecological networks (P174 NPPF). Need to buffer such sites from adverse impacts arising from nearby development is important and consideration should be given to a nominal buffer zone.	<ul style="list-style-type: none"> <li>- Local Wildlife Sites to list of hard constraints?</li> <li>- Consideration for a nominal buffer zone</li> </ul>	<p>These comments are noted and welcomed. Local Wildlife Sites are included within the soft constraints table as they are non-statutory designations. However it is considered that reference should be included to NPPF Paragraph 174 within the Legislation Affording Protection column of the table.</p> <p>The comments relating to a nominal buffer zone are noted. A comprehensive audit will be undertaken of the green infrastructure network and species habitat inventory within the District. This will help to inform policy development and the ability to require a buffer zone within the policy itself so that any future development sites comply with this.</p> <p>Officers will work with Worcestershire County Council and the Wildlife Trust to develop this policy further.</p>
Lichfield District Council	Welcome the inclusion of the broad areas identified in the GBHMA Strategic Growth Study within paragraph 3.2 of the SSM		Comments noted.
Worcestershire County Council	The Children, Families & Communities Department will need to comment on the findings re impact on local education infrastructure.	<ul style="list-style-type: none"> <li>- Include Mineral Consultation Areas as a soft constraint?</li> </ul>	Noted and agreed that MCAs should be included within the soft constraints table (in accordance with NPPF Paragraph 204 and Policy WCS 16 of the Worcestershire



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	<p>Welcome inclusion of Mineral Safeguarding Areas as a soft constraint. Also suggest that the Mineral Consultation Areas should be included as a soft constraint.</p> <p>Also consider that the following should be included as soft constraints: Waste sites, Mineral Sites, Supporting Infrastructure (planned/potential sites for storage, handling, processing, manufacture &amp; transport of minerals)</p> <p>This will ensure that sufficient safeguards are in place to prevent the sterilisation of mineral resources and to prevent significant adverse effects on the proposed land use. Will also enable the implications of any prior extraction /mitigation to be taken into account in considering site viability/timescales for delivery.</p>	<ul style="list-style-type: none"> <li>- Include Waste Sites, Mineral Sites and Supporting Infrastructure as soft constraints?</li> </ul>	<p>Waste Core Strategy Local Plan) and that further consideration should be given to mitigation measures.</p>
Better Environment Theme Group	<p>Need to include BAP in constraints</p> <p>Need to include Landscape Character Mapping to review biodiversity and key sites across the District.</p>	<ul style="list-style-type: none"> <li>- Include Biodiversity Action Plan in constraints (updated?)</li> <li>- Include Landscape Character Mapping?</li> </ul>	<p>Noted. The BAP is currently being updated and will be used to inform the green infrastructure evidence base and biodiversity network mapping.</p> <p>Landscape Character Assessment is also to be undertaken to inform the Plan Review Process.</p>
Councillor Steve Colella	<p>The Planning authority is unlikely to cope with the interest (from Call for Sites) and so should have clear and defensible reasons why and why not land is ultimately taken forward in the development plan. Where land has come forward there should be no assumption in this process that just because there is no suitable land for development there has to be some land that has to be</p>	<ul style="list-style-type: none"> <li>- Classify sites for the District's needs and those for the Greater Birmingham HMA needs?</li> </ul>	<p>Noted, however, it is not considered that the two site types should be distinguished at this stage as this is purely to establish whether a site is potentially suitable for development. The allocation of sites to meet Bromsgrove's own need and cross boundary needs is something</p>

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	<p>found in that area.</p> <p>Any sites that are selected should be subject to a stringent sustainability test in respect of all aspects of the potential developed land. E.g. development of former ADR site in Hagley has shown the increase in population has not been sustainable with roads, schools and doctor's now operating over capacity.</p> <p>The site selection methodology should be such that it doesn't leave the district open to overzealous developers and landowners from both the district and WMCA.</p> <p>Any greenfield sites identified should be classified for either BDC need or Birmingham need and not be able to be developed until all existing sites in the WMCA have been fully developed, including brownfield and greenfield sites, as well as seeking to develop a significant number of vertical living estates. Otherwise higher value sites will be developed first.</p>		<p>that would be considered through the development of the strategy itself.</p> <p>Sustainability Appraisal will be undertaken on all potential sites identified through the Site Selection process.</p>
CPRE	<p>Valued landscapes missing from constraints - probably soft.</p> <p>Worcestershire Landscape Characterisation Assessment serves well to classify landscape types but does not say which are most valued. BDC should commission a report on which are 'valued landscapes' or reinstate the designations in the Worcestershire Structure Plan 2003 (Areas of Great Landscape Value) or the 2004 Plan (Landscape Protection Areas).</p> <p>See NPPF Para 170</p>	<ul style="list-style-type: none"> <li>- Landscapes missing from soft constraints</li> <li>- Commission a report on which are valued landscapes within the District?</li> <li>- Access missing</li> </ul>	<p>Further work is to be undertaken on landscape character assessment as part of the evidence base work.</p> <p>It is considered that this will help to inform site selection but could not be considered as an absolute constraint and should be balanced against mitigation measures following landscape sensitivity assessment.</p> <p>Access will be included within the list of</p>

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	<p>Access is missing from the Soft Constraints There may often be ways of getting around the constraint, but the cost may be so high as to make the development of the land unviable.</p> <p>Noise should be included as a constraint for housing, but not necessarily for employment or warehousing.</p> <p>Agricultural land classification should be included in the list of constraints</p> <p>The distance to local services is an important factor that needs to be taken into account in determining which sites are most suitable. This is not only about the availability of buses.</p> <p>Superfast Broadband availability should be seen as a sustainability issue for new development for housing and employment.</p>	<p>from soft constraints</p> <ul style="list-style-type: none"> <li>- Noise should be included as a constraint (housing)</li> <li>- Agricultural Land Classification should be included in constraints</li> <li>- Distance to local services an important factor that needs to be taken into account</li> <li>- Superfast broadband availability?</li> </ul>	<p>soft constraints in accordance with Paragraph 102 of the NPPF.</p> <p>Noise will be addressed through Development Plan policy when considering individual applications and mitigation requirements.</p> <p>Agricultural land classification will be included within the list of soft constraints.</p> <p>An assessment of local services will be undertaken as part of the settlement hierarchy healthcheck, which will help to inform the overall development strategy. <b>Further consideration to be given to whether the settlement hierarchy should be used to inform the Site Selection Methodology.</b></p> <p>The comments about broadband availability are noted and will be covered by Development Plan policies themselves.</p>
Homes England	<p>The site selection methodology is a comprehensive baseline model from which to begin the site assessment.</p> <p>Accessibility does not appear to be considered in the constraints tables. Whilst this is not an on-site constraint it is a key factor in framing the ability for a site to come forward for development. The matter of access and</p>	<ul style="list-style-type: none"> <li>- Need to consider accessibility</li> </ul>	<p>Noted.</p> <p>Access will be included within the list of soft constraints in accordance with Paragraph 102 of the NPPF.</p> <p>Access and capacity are also to be</p>

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	capacity may be something that is addressed through an Infrastructure Plan as part of the emerging evidence base.		considered through the Infrastructure Delivery Plan and transport modelling which will inform the overall development strategy.
Shakespeare Line Promotion Group	Strongly support the Site Selection Methodology, specifically the sustainability element which deals with the distance to local facilities and public transport links.		Comments are welcomed.
Barton Willmore OBO Church Commissioners for England	<p>Site selection process -support the proposed approach of using the GB Purposes Assessment AND Call for Sites to inform the overall site selection process</p> <p>Site Allocation Uses -Note the reference to allocating sites for a range of uses including self build homes, consider there is insufficient evidence to support such a policy.</p> <p>SHLAA -Note and support the recognition of the SHLAA's role in identifying housing sites</p> <p>Site Re-Assessment - the site remains unchanged from the time it was considered in the 2015 SHLAA. Request that at the time of the re-assessment, the whole site be considered for development potential and request that it is given significant weight (please refer to Vision Statement).</p>	Site specific comments	Support for the approach to site selection is welcomed. The site will be assessed against the finalised methodology if submitted at the Call for Sites stage.
Barton Willmore OBO IM Land	Considered hard constraints should be reconsidered, specifically with regard to: local nature reserves; ancient and veteran trees; BAP priority habitat; Grade I or II* listed buildings; Grade II listed buildings; local sites (wildlife and geological); tree preservation orders. Many of these constraints will not prohibit development and successful design and masterplanning can mitigate and enhance such features. The approach to these constraints should be clarified and what will happen if	<ul style="list-style-type: none"> <li>- Reconsider list of hard constraints – many won't prohibit new development with successful mitigation and design/masterplanning.</li> </ul>	<p>The inclusion of these constraints is considered to be consistent with the NPPF and other legislation which affords protection. They are therefore of paramount importance at site selection stage.</p> <p>Further information will be included in the final methodology on the extent of</p>

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	<p>these are within or adjacent to a site set out.</p> <p>Important part of a review for housing and economic land availability assessments is to test the appropriateness of previously defined constraints, rather than to simply accept them.</p>	<ul style="list-style-type: none"> <li>- Need to test previously defined constraints rather than just accept them.</li> </ul>	<p>buffers required for each of the hard constraints and this will help to clarify the potential for mitigation in the RAG assessments.</p> <p>Further clarity on the approach to these constraints and how mitigation measures are to be considered could be included within the methodology.</p>
Barton Willmore OBO Taylor Wimpey	<p>Paragraph 3.5 Considered hard constraints should be reconsidered, specifically with regard to: local nature reserves; ancient and veteran trees; BAP priority habitat; Grade I or II* listed buildings; Grade II listed buildings; local sites (wildlife and geological); tree preservation orders. Many of these constraints will not prohibit development and successful design and masterplanning can mitigate and enhance such features. The approach to these constraints should be clarified and what will happen if these are within or adjacent to a site set out. Sites should not simply be discounted.</p>	<ul style="list-style-type: none"> <li>- Reconsider list of hard constraints – many won't prohibit new development with successful mitigation and design/masterplanning.</li> <li>- Need to test previously defined constraints rather than just accept them.</li> </ul>	<p>The inclusion of these constraints is considered to be consistent with the NPPF and other legislation which affords protection. They are therefore of paramount importance at site selection stage.</p> <p>Further information will be included in the final methodology on the extent of buffers required for each of the hard constraints and this will help to clarify the potential for mitigation in the RAG assessments.</p> <p>Further clarity on the approach to these constraints and how mitigation measures are to be considered could be included within the methodology.</p>
Claremont Planning OBO Spitfire Bespoke Homes	<p>The Bromsgrove SHLAA is recognised as a suitable starting point for site selection process but the previous findings of the SHLAA shouldn't be utilised/influence the proposed reconsideration of sites.</p>	<ul style="list-style-type: none"> <li>- Previous SHLAA shouldn't influence reconsideration of sites.</li> </ul>	<p>Noted . Agree that the methodology requires further clarity on the relationship of constraints to potential sites and further information on the RAG</p>

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	<p>Proposed thresholds for site selection in respect of their proposed land uses is considered to be appropriate. Concerns chiefly relate to the constraints being applied and their impact upon the consideration of sites. It is not clear from the methodology how these constraints will influence the consideration of sites, whether a site within the general setting of a listed building will be dismissed from further review/or whether listed building has to be within the site. The relationship of constraints to potential sites should be quantified.</p> <p>Existence of constraints within the wider site context should not prevent it from being considered through the selection process, particularly if mitigation is possible. Rather the identified constraints should be used to inform the potential of a site and its worthiness as a development opportunity. The identification of environmental and heritage hard constraints will be restrictive when considering sites with potential to enhance such designations.</p> <p>Identification of a Grade 2 listed building as such a constraint appears overly limiting, particularly given the number and distribution of such buildings across the area. Hard constraints must clarify an impact zone or degree of harm of harm resolution particularly as a review of heritage asset settings/ecological impacts has not been undertaken yet to inform the site selection process. The ability to mitigate impacts and restrict development locations must also inform the process.</p> <p>Suggest the following hard constraints are removed and added to soft constraints/their level of impact is further quantified:</p>	<ul style="list-style-type: none"> <li>- Need to quantify the relationship of constraints to potential sites.</li> <li>- Role for mitigation</li> <li>- Suggest the following should be soft constraints, not hard: Grade 2 Listed Buildings; Mineral Safeguarding Areas; Country Parks; Ancient/Veteran Trees</li> <li>- Need to quantify RAG system – who will undertake scoring/what evidence base relied on/deliverability of site</li> <li>- Further clarification required between Site Selection Methodology &amp; Green Belt Review Assessment.</li> </ul>	<p>and the potential for mitigation.</p> <p>The inclusion of these hard constraints is considered to be consistent with the NPPF. Although for clarification purposes Minerals Safeguarding Areas are included within the Soft Constraints table.</p> <p><b>Include further clarification on the relationship between the Site Selection Methodology &amp; Green Belt Review Assessment at Paragraph 4.3</b></p>

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	<ul style="list-style-type: none"> <li>- Grade 2 listed buildings as impacts are able to be mitigated satisfactorily in most circumstances</li> <li>- Mineral Safeguarding Area - considered inappropriate given that such locations are unlikely to undergo extraction due to viability/amenity safeguarding</li> <li>- Country park - the application of a hard constraint for a site in the general locality of a park is onerous.</li> <li>- Ancient/Veteran trees - can be suitably retained within a development.</li> </ul> <p>The proposed traffic light scoring of such constraints is not qualified sufficiently in respect of who will undertake scoring , which evidence base will be relied upon and the deliverability of the site.</p> <p>Interaction between the Site Selection Methodology and the Green Belt Review Assessment requires further clarification. Particularly relevant when considering the development capacity of a site. The methodology must provide for exceptions and a review of particulars when housing supply shortage requires a boost in delivery.</p>		
Claremont Planning OBO Bellway Homes	<p>The previous findings of the SHLAA should not be utilised or influence the proposed reconsideration of sites. Thresholds for the selection of sites are considered to be appropriate and able to assess suitable strategic scale sites.</p> <p>Methodology is not clear on how constraints will influence the consideration of sites. To allow site promoters to be able to quantify these constraints and understand the process, the relationship of constraints to potential sites should be quantified. The existence of constraints within the wider context of a site should not</p>	<ul style="list-style-type: none"> <li>- Need to quantify the relationship of constraints to potential sites.</li> <li>- Role for mitigation</li> <li>- Suggest the following should be soft constraints, not hard: Grade 2 Listed Buildings; Mineral Safeguarding</li> </ul>	<p>Noted . Agree that the methodology requires further clarity on the relationship of constraints to potential sites and further information on the RAG and the potential for mitigation.</p> <p>The inclusion of these hard constraints is considered to be consistent with the NPPF. Although for clarification purposes Minerals Safeguarding Areas are included within the Soft Constraints table.</p>

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	<p>prevent it from being considered through the selection process, particularly if mitigation is possible, e.g. mineral safeguarding area is not prohibitive when mineral extraction is limited by viability of specific site circumstances.</p> <p>Identification of Grade II listed buildings as such a constraint appears overly limiting, particularly given the number and distribution across the District. Identification of these constraints must clarify an impact zone or degree of harm resolution. What must also inform the process and consideration of site sieving is the ability to mitigate impacts and restrict development location - whether officers will be able to undertake this effectively for every site considered is questionable.</p> <p>Hard constraints that are advised to be removed or added to soft constraints are as follows: Grade II listed buildings; mineral safeguarding area; country park; ancient or veteran trees. Assessment to ascertain whether mitigation of soft constraints will be possible is not clearly set out. Proposed traffic light scoring is not qualified sufficiently in respect of who will undertake the scoring, which evidence base/additional materials will be used and whether there will be correspondence with a site's owners.</p> <p>The interaction between the SSM and GB review requires further clarification. This is particularly relevant when considering the development capacity of a site as such capacity could be over predicted by officers and</p>	<p>Areas; Country Parks; Ancient/Veteran Trees</p> <ul style="list-style-type: none"> <li>- Need to quantify RAG system – who will undertake scoring/what evidence base relied on/deliverability of site</li> <li>- Further clarification required between Site Selection Methodology &amp; Green Belt Review Assessment.</li> </ul>	<p>Include further clarification on the relationship between the Site Selection Methodology &amp; Green Belt Review Assessment at Paragraph 4.3.</p>



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	inappropriate levels of mitigation provided as a result. The dismissal of a site's potential for such reasons is a possibility.		
Claremont Planning OBO Mactaggart & Mickel Group	<p>The previous findings of the SHLAA should not be utilised or influence the proposed reconsideration of sites. Thresholds for the selection of sites are considered to be appropriate and able to assess suitable strategic scale sites.</p> <p>Methodology is not clear on how constraints will influence the consideration of sites. To allow site promoters to be able to quantify these constraints and understand the process, the relationship of constraints to potential sites should be quantified. The existence of constraints within the wider context of a site should not prevent it from being considered through the selection process, particularly if mitigation is possible, e.g. mineral safeguarding area is not prohibitive when mineral extraction is limited by viability of specific site circumstances.</p> <p>Identification of Grade II listed buildings as such a constraint appears overly limiting, particularly given the number and distribution across the District. Identification of these constraints must clarify an impact zone or degree of harm resolution. What must also inform the process and consideration of site sieving is the ability to mitigate impacts and restrict development location - whether officers will be able to undertake this effectively for every site considered is questionable.</p>	<ul style="list-style-type: none"> <li>- Need to quantify the relationship of constraints to potential sites.</li> <li>- Role for mitigation</li> <li>- Suggest the following should be soft constraints, not hard: Grade 2 Listed Buildings; Mineral Safeguarding Areas; Country Parks; Ancient/Veteran Trees</li> <li>- Need to quantify RAG system – who will undertake scoring/what evidence base relied on/deliverability of site</li> <li>- Further clarification required between Site Selection</li> </ul>	<p>Noted . Agree that the methodology requires further clarity on the relationship of constraints to potential sites and further information on the RAG and the potential for mitigation.</p> <p>The inclusion of these hard constraints is considered to be consistent with the NPPF. Although for clarification purposes Minerals Safeguarding Areas are included within the Soft Constraints table.</p> <p>Include further clarification on the relationship between the Site Selection Methodology &amp; Green Belt Review Assessment at Paragraph 4.3.</p>

Respondent	Summary of Response to Site Selection Methodology	Main points to address	Officer Response/Proposed Amendment to Site Selection Methodology
	<p>Hard constraints that are advised to be removed or added to soft constraints are as follows: Grade II listed buildings; mineral safeguarding area; country park; ancient or veteran trees. Assessment to ascertain whether mitigation of soft constraints will be possible is not clearly set out. Proposed traffic light scoring is not qualified sufficiently in respect of who will undertake the scoring, which evidence base/additional materials will be used and whether there will be correspondence with a site's owners.</p> <p>The interaction between the SSM and GB review requires further clarification. This is particularly relevant when considering the development capacity of a site as such capacity could be over predicted by officers and inappropriate levels of mitigation provided as a result. The dismissal of a site's potential for such reasons is a possibility.</p>	Methodology & Green Belt Review Assessment.	
Claremont Planning OBO Miller Homes	<p>The previous findings of the SHLAA should not be utilised or influence the proposed reconsideration of sites. The proposed thresholds for the selection of sites in respect of their proposed land uses is considered to be appropriate</p> <p>What is not clear is how these constraints will influence the consideration of sites, whether a site within the general setting of a listed building will be dismissed from further review or whether the listed building has to be within the site. The relationship of constraints to potential sites should be quantified.</p> <p>The existence of constraints within the wider context of a site should not prevent it from being considered through</p>	<ul style="list-style-type: none"> <li>- Need to quantify the relationship of constraints to potential sites.</li> <li>- Role for mitigation</li> <li>- Suggest the following should be soft constraints, not hard: Grade 2 Listed Buildings; Mineral Safeguarding Areas; Country</li> </ul>	<p>Noted . Agree that the methodology requires further clarity on the relationship of constraints to potential sites and further information on the RAG and the potential for mitigation.</p> <p>The inclusion of these hard constraints is considered to be consistent with the NPPF. Although for clarification purposes Minerals Safeguarding Areas are included within the Soft Constraints table.</p>

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	<p>the selection process, particularly if mitigation is possible. Rather the identified constraints should be used to inform the potential of a site and its worthiness as a development opportunity.</p> <p>The identification of environmental and heritage hard constraints will be restrictive when considering sites with potential to enhance such designations.</p> <p>The identification of a Grade 2 listed building as such a constraint appears overly limiting, particularly given the number and distribution of such buildings across the area of District. The identification of these hard constraints must therefore clarify an impact zone or degree of harm resolution particularly as a review of heritage asset settings/ecological impacts has not been undertaken yet to inform the site selection process. The ability to mitigate impacts and restrict development location must be used to inform the process. The application of such a broad scope of hard constraints will be limiting to the success of this exercise. Inappropriate hard constraints include Grade 2 listed buildings; mineral safeguarding areas; County Park and Ancient or Veteran Trees.</p> <p>The application of soft constraints and assessment to ascertain whether mitigation will be possible to overcome the constraints affecting a site is not clearly set out. The proposed traffic light scoring of such constraints is not qualified sufficiently in respect of who will undertake the scoring, which evidence base or additional materials will be relied upon and whether there will be correspondence with a site's owners to confirm the deliverability of the site as assessed.</p> <p>The interaction between the Site Selection Methodology</p>	<p>Parks; Ancient/Veteran Trees</p> <ul style="list-style-type: none"> <li>- Need to quantify RAG system – who will undertake scoring/what evidence base relied on/deliverability of site</li> <li>- Further clarification required between Site Selection Methodology &amp; Green Belt Review Assessment.</li> </ul>	<p>Include further clarification on the relationship between the Site Selection Methodology &amp; Green Belt Review Assessment at Paragraph 4.3.</p>

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	and Green Belt Review Assessment requires further clarification. Particularly in respect of how the constraint of Green Belt and producing an effective Green Belt boundary through the review exercise inter-reacts with the site selection methodology.		
David Lock Associates OBO Birmingham Property Services	<p>The consideration and filtering of sites through hard and soft constraints is an acceptable and recognised method of site appraisal based on physical or policy constraints.</p> <p>Suggest the addition of a more 'positive' set of spatial or policy objectives for growth to be taken into account in the assessment of individual sites for growth in order to draw up land allocations which achieve wider growth objectives set by BDC. For example, if one of the district-wide objectives for Bromsgrove were to reduce the absolute amount of travelling between homes and work, then sites which are located closer to centres of existing or planned employment may be considered more favourably than those in more distant locations.</p> <p>We note the intention to publish a SHLAA addendum ahead of the Call for Sites exercise. It runs the risk of the Call for Sites process then being confused by submissions objecting to the proposed consideration/development of the SHLAA Addendum as well as the submission of 'new sites' for the first time and land put forward for the call for sites. Therefore, any public consultation will need to make very clear that the SHLAA Addendum and the land put forward in the call for sites will all be considered as part of the same assessment process.</p>	<ul style="list-style-type: none"> <li>- Requires more positive spatial policy objectives for site consideration</li> </ul>	<p>Comments and support are noted. Consider the comments are related to policy options development rather than the site assessment methodology.</p> <p>Comments relating to the SHLAA addendum are noted and agreed. Suggest that this is further clarified through additional text at Paragraph 4.3.</p>
First City	Consider that all sites should be assessed thoroughly and		Noted. The SA will also assess

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	based on their own merits against its level of sustainability. Should not be excluded based solely on whether it is currently Green Belt or other reasons which would initially exclude a site from being assessed positively.		development options with regard to sustainability.
Framptons	It is considered that Table 2 'Identified Hard Constraints' should include reference to the West Midlands Green Belt, at present there is no reference to the Green Belt in either the 'Identified Hard Constraints' nor the 'Identified Soft Constraints' listed within the report.		Noted. However, this is to be considered as part of the Green Belt Boundary Review - Stage 2 process. Further clarity will be provided within the methodology.
GVA obo Birmingham University	<p>We have no difficulty with the site size thresholds and consider it appropriate for thresholds to be set low so that a variety of site sizes can be assessed and allocated for development in the BDPR. However, when identifying sites for development later in the plan-making process the Council will need to give careful consideration to the relative advantages and disadvantages of allocating small, medium and large sites, having regard to the provisions of the NPPF. Not only can large numbers of new homes often be best delivered on larger sites, but these sites are usually better able to support investment in local infrastructure.</p> <p>We broadly agree with the list of sources proposed for site identification. However, we note that the broad areas identified in the 'GBHMA Strategic Growth Study' (SGS) forms part of this identification process. We do not believe that SGS sites should be included in the list of site sources. Instead, the Council should rely on its own analysis and sites put to it by landowners, promoters and developers in the normal way.</p>	<ul style="list-style-type: none"> <li>- SGS sites should not be included within the list of site sources.</li> <li>- No indication as to how sites that make it through the initial sieve (Stage 3) will be assessed on a comparative basis during Stages 4 and 5 and how, during these latter stages, the Sustainability Appraisal will play a part in identifying those sites that are to be proposed for allocation and</li> </ul>	<p>Comments are noted with regard to the SGS sites as a potential source, however no reasoning is provided as to why they shouldn't be included. There are a number of sources identified at paragraph 3.2 and it is important that all potential sources are exhausted to undertake a thorough assessment.</p> <p>Support for the general methodology is welcomed. Agree that further clarity is required with regard to stages 4 and 5 and the links with Sustainability Appraisal. This will be provided under Part 4 - Consultation and Next Steps.</p>

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	<p>We agree with the proposed methodology of applying a layered approach to considering constraints i.e. identify 'hard' constraints first to identify areas where development would generally be unacceptable, followed by consideration of 'soft' constraints to identify potential impacts on site capacity, or requirements for mitigation.</p> <p>It is concerning that the Site Selection Methodology Paper gives no indication as to how sites that make it through the initial sieve (Stage 3) will be assessed on a comparative basis during Stages 4 and 5 and how, during these latter stages, the Sustainability Appraisal will play a part in identifying those sites that are to be proposed for allocation and those that are to be rejected.</p>	<p>those that are to be rejected</p>	
Harris Lamb OBO Barberry & IM Land	<p>Significant concern with the proposed site selection methodology. Looks to assess sites principally on a constraints led only basis. This completely ignores any potential benefits that the sites could deliver if they were developed.</p> <p>The assessment overlooks the potential sustainability characteristics of the sites of their relationship to existing shops, services and facilities. If the potential benefits and contribution to sustainable development that may accrue from its development outweigh this conflict then the sites should not be dismissed for allocation. The methodology could result in sites that would make an acceptable contribution to sustainable development being disregarded as they conflict with one of the constraints criteria.</p> <p>Recommend that a further step is introduced into the</p>	<ul style="list-style-type: none"> <li>- Assessment overlooks potential sustainability characteristics of sites</li> <li>- Introduce a further step that looks at the individual site's contribution to sustainable development.</li> </ul>	<p>Note the comments but consider this falls within the remit of the SA and options development for the overall development strategy.</p> <p>The proposed RAG assessment allows for the consideration of potential mitigation measures and benefits of developing the sites.</p> <p>Further clarification will be provided at Section 4 as to the relationship with the SA process.</p>

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	assessment process that looks at the individual sites' contribution to sustainable development and that this is factored into the overall consideration of a site's suitability. This stage is considered important as the sites as part of this assessment will be fed into Part 2 Green Belt Assessment.		
Harris Lamb OBO Barratt Homes	The focus on assessing sites only on the basis of whether they conflict with either a hard or soft constraint completely ignores any potential benefits that the sites could deliver if they were developed. The assessment overlooks the potential sustainability characteristics of the sites or their relationship to existing shops, services and facilities. It is felt that whilst a site may conflict in part with a soft constraint, if the potential benefits and contribution to sustainable development that may accrue from its development outweigh this conflict then the site should not be dismissed for allocation. The methodology as currently drafted could result in sites that would make a perfectly acceptable contribution to sustainable development being disregarded as they conflict with one of the constraints criteria set out in the methodology. Recommend that a further step is introduced into the assessment process that looks at the individual sites' contribution to sustainable development and that this is factored into the overall consideration of a site's suitability, rather than just focussing on whether or not it conflicts with hard or soft constraints.	<ul style="list-style-type: none"> <li>- Assessment overlooks potential sustainability characteristics of sites</li> <li>- Introduce a further step that looks at the individual site's contribution to sustainable development.</li> </ul>	<p>Note the comments but consider this falls within the remit of the SA and options development for the overall development strategy.</p> <p>The proposed RAG assessment allows for the consideration of potential mitigation measures and benefits of developing the sites.</p> <p>Further clarification will be provided at Section 4 as to the relationship with the SA process.</p>
Harris Lamb OBO Bloor Homes	The focus of assessing sites only on the basis of whether they conflict with either a hard or soft constraint completely ignores any potential benefits that the sites could deliver if they were developed. Furthermore, the	<ul style="list-style-type: none"> <li>- Assessment overlooks potential sustainability characteristics of</li> </ul>	Note the comments but consider this falls within the remit of the SA and options development for the overall development strategy.

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	<p>assessment overlooks the potential sustainability characteristics of the sites or their relationship to existing shops, services and facilities. The methodology as currently drafted could result in sites that would make a perfectly acceptable contribution to sustainable development being disregarded as they conflict with one of the constraints criteria set out in the methodology.</p> <p>Recommend a further step is introduced into the assessment process that looks at the individual sites' contribution to sustainable development and that this is factored into the overall consideration of a site's suitability, rather than just focussing on whether to not it conflicts with hard or soft constraints.</p> <p>The site selection methodology is not clear in how the Council are going to meet the unmet needs, in that will all sites be assessed the same irrespective of whether they are intended to predominantly serve the needs of Bromsgrove or Birmingham. If there is only a single set of site criteria, it would not be possible to distinguish between sites that are predominantly there to meet Birmingham's needs, and which may perform less well if they were assessed against Bromsgrove centric criteria for example. We, therefore, suggest that the Council at the outset of the assessment process, define whether a site is being considered to meet Bromsgrove's needs or whether it is being considered to meet Birmingham's needs.</p> <p>We would wish to guard against any undue bias entering</p>	<p>sites</p> <ul style="list-style-type: none"> <li>- Introduce a further step that looks at the individual site's contribution to sustainable development.</li> <li>- Define whether a site is being considered to meet Bromsgrove's own needs or Greater Birmingham.</li> </ul>	<p>The proposed RAG assessment allows for the consideration of potential mitigation measures and benefits of developing the sites.</p> <p>Further clarification will be provided at Section 4 as to the relationship with the SA process.</p> <p>Do not agree that the separate needs of Bromsgrove and the GBHMA should be distinguished at this stage as this is purely to establish whether a site is potentially suitable for development. This is something that would be considered through the development of the strategy itself.</p>



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	<p>into the assessment in terms of benefits of impacts that may arise from a specific site due to its scale. However, larger urban extensions could be argued to have a number of additional benefits that they could deliver over and above smaller sites. The benefits need to be properly weighed up in the overall planning balance against the likely impacts that may arise to determine whether a site is suitable or not.</p>		
<p>Harris Lamb OBO Willowbrook Garden Centre</p>	<p>Concerned that sites will principally be assessed on a constraints led basis only.</p> <p>This method ignores any potential benefits that a site could deliver if developed.</p> <p>The assessment overlooks the potential sustainability characteristics of sites or their relationship to existing shops, services and facilities. Whilst a site may conflict in part with hard or soft constraints, if the potential benefits and contribution to sustainable development that may accrue from its development outweigh this conflict then the site should not be dismissed for allocation.</p> <p>A further step should be introduced into the assessment process that looks at an individual sites contribution to sustainable development and that this is factored into the overall consideration of a site's suitability.</p> <p>Other factors that should be taken into account include (but are not restricted to):</p> <p>The ability to use PDL or under utilised sites</p> <p>The ability to release small/medium sized sites which are</p>	<ul style="list-style-type: none"> <li>- Assessment overlooks potential sustainability characteristics of sites</li> <li>- Introduce a further step that looks at the individual site's contribution to sustainable development.</li> <li>- Ability to release small/medium sized sites</li> </ul>	<p>Note the comments but consider this falls within the remit of the SA. The proposed RAG assessment allows for the consideration of potential mitigation measures and benefits of developing the sites.</p> <p>With regard to smaller sites – it is considered that the call for sites process could be split into smaller sites and larger strategic sites.</p>

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	capable of fulfilling the policy objectives of NPPF para 68		
Harris Lamb OBO Worcestershire Health and Care NHS Trust	<p>Supportive of the range of sites that are to be assessed through the Site Selection process, but do have significant concerns with the proposed methodology. Completely ignores any potential benefits that the sites could deliver if they were developed. Furthermore, the assessment overlooks the potential sustainability characteristics of the sites, or their relationship to existing shops, services &amp; facilities. The methodology as drafted could result in sites that would make a perfectly acceptable contribution to sustainable development being disregarded as they conflict with one of the constraints criteria set out in the methodology.</p> <p>Recommend that a further step is introduced into the assessment process that looks at individual site's contributions to sustainable development and that this is factored into the overall consideration of a site's suitability, rather than just focussing on whether or not it conflicts with hard or soft constraints.</p> <p>Also consider that other factors should be taken into account including:</p> <ul style="list-style-type: none"> <li>- Ability to use previously developed/under utilised sites</li> <li>- Ability to release small/medium sized sites which are capable of fulfilling the policy objectives of NPPF para 68 (given their ability to be released quickly).</li> </ul>	<ul style="list-style-type: none"> <li>- Assessment overlooks potential sustainability characteristics of sites</li> <li>- Introduce a further step that looks at the individual site's contribution to sustainable development.</li> <li>- Ability to release small/medium sized sites</li> </ul>	<p>Note the comments but consider this falls within the remit of the SA. The proposed RAG assessment allows for the consideration of potential mitigation measures and benefits of developing the sites.</p> <p>With regard to smaller sites – it is considered that the call for sites process could be split into smaller sites and larger strategic sites.</p>
Iceni Projects OBO Generator Developments	We are broadly happy with the site selection methodology and its focus on the least subjective constraints. Further assessment of the sites will be required as the sieving process will deliver a large number of appropriate sites.		Comments are noted and agreed.
Lichfields OBO	General approach seems to be reasonable.	- Clarification should	Support for the general approach is

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Taylor Wimpey Strategic Land	<p>Consider that further clarification is required regarding the extent to which any such hard constraints that are located on, or within close proximity, of a site would undermine its suitability for development and thereby preclude its allocation. If the proximity of hard constraints is to be considered as part of the site selection process, request that clarification is provided regarding the definition of close proximity.</p> <p>Acknowledge the need for mitigation measures in relation to soft constraints, however, consider that further clarification is needed as to whether any potential mitigation measures might be appropriately sought in relation to hard constraints in order to overcome concerns regarding the impact of development.</p> <p>Consideration should be given to site design and how both hard and soft constraints can be incorporated into development schemes.</p> <p>Request clarification as to whether a similar approach might also appropriately be applied for the weighting of hard constraints, or will they be treated equally, irrespective of their nature /extent to which they affect a particular site. If they are to be treated equally, their level of adverse impact should be expressed within the consultation document.</p>	<p>be provided regarding definition of close proximity</p> <ul style="list-style-type: none"> <li>- Clarify role of mitigation measures.</li> <li>- Will hard constraints be weighted?</li> </ul>	<p>welcomed.</p> <p>Agree that clarification is required on the definition of “close proximity” This will be clarified through applying buffer zones.</p> <p>Agree that further clarity is required on the role of mitigation.</p>
LRM Planning OBO Persimmon Homes	<p>We agree that the Council will need to consider a variety of sites for potential allocation for development, including large scale mixed use strategic sites and smaller residential sites that can be developed quickly and without the need for potentially complex infrastructure.</p> <p>We also agree that the assessment of sites and ultimately</p>		<p>Support for the general approach, identified constraints and RAG assessment is welcomed.</p>

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	<p>the selection of proposed allocations will need to determine the most suitable, sustainable and deliverable sites and in this regard the selection of a spatial strategy and sites are inter-related processes. The GB assessment will be central to this selection process; sites which perform best in terms of the GB Assessment will be important elements in a future development land strategy.</p> <p>The NPPF identifies that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly (para 68). It goes on to encourage the identification, through the development plan and brownfield registers, land to accommodate at least 10% of a Plan area's housing requirement on sites no larger than one hectare. It will be important for the Council to understand the practical implications of such an approach in the context of the spatial strategy, the Green Belt Assessment and the comparative sustainability benefits and infrastructure investment advantages of larger scale development.</p> <p>We agree with the hard constraints identified in Table 2. We also agree with the soft constraints identified in Table 3. These are constraints that can be taken into account in masterplanning development schemes as outlined in paragraph 3.5. We agree with the RAG Rating proposed in Table 4.</p>		
Pegasus OBO Gallagher Estates	Site Size Thresholds - minimum site size of 0.16ha/ min 5 dwellings. This approach is not consistent with Para 68 of	- Site size thresholds need to be	The comments relating to site size thresholds are noted and agreed. The

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	<p>the NPPF and should be brought into line with national policy to allow the consideration of smaller sites. Supports the identified range of sources from which potential development sites will be drawn. Considered that more detail should be included within the methodology to make it clear to what degree these constraints will be applied and at what distance from sites they are relevant.</p> <p>Note that the list of constraints doesn't include Agricultural Land Classification &amp; Soils, Landscape Designations or Contaminated Land, these should be included.</p> <p>Considered imperative that the ratings exercise results are published for comment as part of the evidence base and that how they have informed the selection of Preferred Options is a transparent and impartial process. Note that the agent has submitted RAG assessments for all Gallagher Estates' land parcels - Bleakhouse Farm, Bordesley; Maypole Lane; Station Road &amp; Norton Farm.</p>	<p>consistent with para 68 of the NPPF.</p> <ul style="list-style-type: none"> <li>- Make it clear at what distance constraints will apply.</li> <li>- Should include Agricultural Land Classification, Landscape Designations and Contaminated Land.</li> <li>- Imperative that the ratings exercise results are published for comment as part of the evidence base.</li> </ul>	<p>call for sites process could be split into smaller sites and larger sites.</p> <p>Agree that further clarification is required within the narrative relating to when the constraints will be applied.</p> <p>The constraints list will be amended to include agricultural land classification at Table 3. Further consideration will be given to the inclusion of contaminated land as a constraint as this is something that could be mitigated through de-contamination and may not necessarily rule a site out.</p>
Phillip Woodhams OBO Billingham & Kite Ltd	Unable to support the overall approach in the Site Selection Methodology Report. In its present structure it is at risk of a legal challenge.		Comments are noted. However the respondent does not provide any information as to why it would be at risk from legal challenge.
RPS OBO Messrs Wild, Johnson, McIntyre & Fisher	In principle the process would appear to follow a sensible set of stages that follow in a logical order. There would appear to be a lack of detail on what criteria or scoring will be applied at the site selection analysis stage, and insufficient detail provided to clarify the precise relationship with the Green Belt Assessment. No explanation is given as to what the detailed assessment is	<ul style="list-style-type: none"> <li>- Lack of detail on criteria/scoring.</li> <li>- Lack of detail regarding the Stage 4 process.</li> <li>- Not clear how the RAG ratings will be</li> </ul>	These comments are noted. It is agreed that further detail is required in the methodology for clarification purposes.

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	<p>or how the final sites are to be selected. The lack of detail regarding the Stage 4 process prevents any proper refining of the methodology at this stage. RPS therefore surmises that stage 4 is an amalgamation of both site selection and the GB assessment with the outputs then feeding into stage 5. BDC should provide the necessary clarification and give consultees the opportunity to provide comments. Without such comments BDC cannot conclude on any degree of sign up from stakeholders which undermines credibility.</p> <p>Notwithstanding this RPS are broadly comfortable with the filtering process to be applied up to and including stage 3. It is not clear how the RAG ratings will be applied as part of the site selection analysis. Again further clarification is requested.</p>	<p>applied.</p> <ul style="list-style-type: none"> <li>- Insufficient detail between the site selection analysis and the GB assessment.</li> <li>- Opportunity for consultees to provide their views, prior to any formal consultation on the chosen sites.</li> </ul>	
RPS OBO Gleasons	<p>In principle, the process summarised above would therefore appear to follow a sensible set of stages that are proposed to follow in a logical order.</p> <p>There would appear to be a lack of detail on what criteria or scoring (if any) will be applied at the site selection analysis stage, nor sufficient detail provided to clarify the precise relationship between the site selection analysis and the GB assessment. No explanation is given as to what the 'detailed assessment' is or how the final sites are to be selected, even in general terms at this stage. Consequently, there is no detail as to how stage 4 will operate. The Council should therefore provide the necessary clarification and give consultees an opportunity to submit comments.</p>	<ul style="list-style-type: none"> <li>- Lack of detail on criteria/scoring.</li> <li>- Lack of detail regarding the Stage 4 process.</li> <li>- Not clear how the RAG ratings will be applied.</li> <li>- Insufficient detail between the site selection analysis and the GB assessment.</li> <li>- Opportunity for consultees to</li> </ul>	These comments are noted. It is agreed that further detail is required in the methodology for clarification purposes.

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	<p>The lack of detail regarding the actual mechanics of the site selection process prevents any proper 'refining' of the methodology at this stage. The Council should therefore provide the necessary clarification and give consultees an opportunity to submit comments.</p> <p>We are broadly comfortable with the filtering process to be applied up to and including Stage 3.</p> <p>We broadly agree with the categorization of 'hard' and 'soft' constraints, and the use of a traffic light approach to filtering sites in/out . However, it is not made clear how the ratings will be applied as part of the site selection analysis. Further clarification on this would also e welcomed, with an opportunity for consultees to provide their views, prior to any formal consultation on the chosen sites.</p>	<p>provide their views, prior to any formal consultation on the chosen sites.</p>	
Simply Planning OBO Woodpecker Plc	Need to promote sustainable patterns of development should be considered at the outset of the review process and should be explicitly provided for in the assessment methodology.		Noted. This is the role of developing the Preferred Options and the overarching Development Strategy. The Settlement Hierarchy could be used to inform the site assessment process.
Star Planning OBO Richborough Estates	<p>Welcome the openness in publishing approach to assessment of individual sites. However consideration should be given to how assessments are undertaken for strategic sites which might contain more land than required for built development compared to smaller sites that could be developed in their entirety.</p> <p>RAG rating may be too crude for strategic sites, e.g. constraint could apply to land within a strategic site</p>	<ul style="list-style-type: none"> <li>- RAG too crude for strategic sites?</li> <li>- At what distance from the site will the constraint become relevant</li> </ul>	The points relating to the strategic sites are noted. It is considered that the Site Selection Methodology process could be split into two, one for smaller sites and one for larger sites. This may help to address some of the concerns about the RAG assessment.

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	<p>however it may be that the land affected by the constraint is not proposed to be developed. Where this occurs then the site should be scored green rather than blue because there would be no adverse impacts requiring mitigation.</p> <p>Is it correct to assume the relevant listed constraint must be within the site being assessed or will judgements be made about the effect of development adjacent to a listed constraint? If the latter then there will need to be a clearly justified evidence base to demonstrate what harm would be caused.</p>		The assumptions relating to listed constraints will be clarified using Historic England's advice note on the setting of listed buildings and the potential cumulative impact.
Charlotte Quirck	Utilise brownfield sites rather than Green Belt sites		Comments are noted. However there are not enough brownfield sites available within the District to meet all of its housing needs.
Christine Thomas	Refers to the Lodge Farm area within the Bishop of Worcester's deer park. This is prime arable farming land in constant use, adjacent to the River Arrow, feel that on historic grounds and to preserve landscape these points should be strong factors to consider when planning future development in Alvechurch.		Comments are noted. As part of the evidence base to inform the Local Plan Review, the Council will be undertaking Landscape Character Assessment which will also inform the future development strategy.
Ian Macpherson	Proposed methodology seems sensible. Flooding considerations to incorporate groundwater and overland flows too. Probability of flooding should be noted as a percentage probability in any one year.	- Groundwater and overland flows need to be taken into consideration.	This will be considered through the Strategic Flood Risk Assessment and the Sequential Testing process for sites.
Mary Rowlands	Green Belt – in choosing sites for future housing, thought must be given to selecting the sites which are not good agricultural land.	- Agricultural Land Classification as a constraint.	Noted and agreed. This will be included as a constraint within the site selection methodology, but is separate from the Green Belt Assessment.
RPS	In principle, the process appears to follow a sensible set	- Lack of detail on	These comments are noted and it is



Respondent	Summary of Response to Site Selection Methodology	Main points to address	Officer Response/Proposed Amendment to Site Selection Methodology
	<p>of stages that are proposed to follow in a logical order. We accept and agree with this approach up to a point.</p> <p>There would appear to be a lack of detail on what criteria or scoring (if any) will be applied at the site selection analysis stage,</p> <p>Insufficient detail provided to clarify the precise relationship between the site selection analysis and the GB assessment. Little explanation is given as to what the 'detailed assessment' comprises or how the final sites are to be selected, even in general terms.</p> <p>Broadly comfortable with the filtering process to be applied up to and including Stage 3. Broadly agree with the categorization of 'hard' and 'soft' constraints, and the use of a traffic light approach to filtering sites in/out at this stage.</p> <p>The assessment process must not rule out locations simply because of the potential for environmental harm, when evidence is available to demonstrate that appropriate mitigation is available to appropriately mitigate that harm.</p> <p>It is not made clear how the ratings will be applied as part of the site selection analysis. Further clarification on this would also be welcomed, with an opportunity for consultees to provide their views, prior to any formal consultation on the chosen sites.</p>	<p>criteria/scoring.</p> <ul style="list-style-type: none"> <li>- Lack of detail regarding the Stage 4 process.</li> <li>- Not clear how the RAG ratings will be applied.</li> <li>- Insufficient detail between the site selection analysis and the GB assessment.</li> <li>- Opportunity for consultees to provide their views, prior to any formal consultation on the chosen sites.</li> </ul>	<p>agreed that further clarification is required within the narrative of the methodology.</p>