

**Inspector's Proposed Main  
Modifications to the  
Bromsgrove District Plan**

**Consultation**

**27<sup>th</sup> July – 21<sup>st</sup> September 2016**

## Bromsgrove District Plan – Proposed Main Modifications (Consultation Version)

This schedule sets out the Proposed Main Modifications to the submitted version of the District Plan that, subject to the outcome of this consultation period, are considered to be necessary in order for it be ‘sound’ and able to be adopted by the District Council as a Development Plan Document.

The modifications below are expressed either in the conventional form of ~~strike through~~ for deletions and *italics* for additions of text, or by specifying the modification in words in **bold text**.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text. Further renumbering of pages and paragraphs will be required as a consequence of these modifications.

Ref	Page	Policy/ para	Main Modification
MM1	3	Introduction and Context 1.7	<p>The Plan includes:</p> <ul style="list-style-type: none"> <li>• A District Profile which describes Bromsgrove as it is at the moment</li> <li>• The challenges facing Bromsgrove that the Plan can help to address and the objectives for addressing these challenges</li> <li>• A vision of how the District could develop as a place to meet the needs of its local residents, businesses and visitors in the future</li> <li>• A strategy to direct growth to sustainable locations and achieve the vision</li> <li>• A set of Policies to deliver the strategy</li> <li>• A monitoring and implementation framework for delivering the Plan. The Plan is supported by a draft Infrastructure Delivery Plan (IDP) which attempts to show how the proposed development may be delivered.</li> </ul> <p>The IDP is <del>at present in draft and as a 'live' document and will be updated before Submission of the Plan.</del> The draft IDP can be found as a separate document.</p>
MM2	10	District Profile 2.28	<p>Due to the District's close proximity to the West Midlands conurbation, many inhabitants in Bromsgrove <i>District</i> commute to work in Birmingham, <i>the Black Country and Solihull</i>.</p>
MM3	12	Vision 4.6	<p>In the next 15 to 20 years, the District will have achieved a more balanced housing market and be continuing to deliver the required level of housing growth to meet local needs, <i>including the needs of the elderly population</i>.</p>
MM4	13	Vision 4.12	<p><i>Following the Local Plan Review, the Green Belt boundary boundaries will remain unchanged<sup>8</sup> and until 2030 and beyond.</i> The quality of the environment will continue to improve with the existing high levels of open space and ‘greenery’ within the settlements maintained and improved.</p> <p><del>8. Subject to Redditch Cross Boundary Sites and full Green Belt Review by 2030</del></p>

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MM5	17	BDP1.3	b) Specific policies in that Framework indicate that development should be restricted as stated in footnote 9 of paragraph 14 of the NPPF. For example, those policies relating to sites designated as Sites of Special Scientific Interest; <del>remaining</del> land designated as Green Belt, Local Green Space, designated Heritage Assets and locations at risk of flooding.
MM6	17	BDP1.4	Accessibility to public transport options and the ability of the local <i>and strategic</i> road networks to accommodate additional traffic;
MM7	17	BDP1.4	d) The quality of the natural environment including any potential impact on biodiversity, <i>water quality, geodiversity</i> , landscape and the provision of/and links to green infrastructure (GI) networks;
MM8	18	BDP2 8.13	Whilst the majority of development will occur around the Town and in the larger settlements there will be opportunities for small affordable housing schemes in rural settlements that meet local needs. <i>To reflect the need to boost housing the four facets of housing delivery set out in the policy are not set out in a priority order as it is recognised that all four will have an important role in delivering housing.</i> Until a Green Belt Review <i>and Local Plan Review</i> is carried out it is considered desirable for village envelope boundaries to remain unchanged.
MM9	19	BDP2	<del>BDP2.1</del> <i>Initially</i> there will be four main facets to the delivery of housing <del>in-to</del> <i>meet the needs of</i> Bromsgrove District consisting of the following: a) <del>BDP2.1</del> Development of previously developed land or buildings within existing settlement boundaries which are not in the designated Green Belt; b) <del>BDP2.2</del> Expansion Sites around Bromsgrove Town (as identified in BDP 5A); c) <del>BDP2.3</del> Development Sites in or adjacent to large settlements (as identified in BDP 5B); <i>and</i> d) <del>BDP.2.4</del> Exceptionally, affordable housing will be allowed in or on the edge of settlements in the Green Belt where a proven local need has been established through a comprehensive and recent survey and where the choice of site meets relevant planning criteria. Where viability is a concern the inclusion of other tenures within a scheme may be acceptable where full justification is provided. Where a proposed site is within the boundaries of a settlement, which is not in the Green Belt, a local need for housing would not need to be justified. <i>Proposals for development for needs arising outside the District will be fully justified and based on principles of sustainable development and evidence indicating the most appropriate location for such development across the West Midlands area.</i> BDP2.2 <del>BDP2.5</del> Proposals for new development <i>for Bromsgrove's needs</i> should be located in accordance with the District's settlement hierarchy as shown in table 2 <del>on page 20</del> <i>within this policy if up to date evidence supports this.</i> This will ensure that development contributes to the regeneration priorities for the area, preserves the attractiveness of the environment, reduces the need to travel and promotes sustainable communities based on

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			<p>the services and facilities that are available in each settlement and will assist villages to remain viable and provide for the needs of the catchment population that they serve.</p> <p><del>BDP2.6 The Settlement Hierarchy outlined above will provide the guiding principles in terms of sustainability for the proposed Green Belt Review sequential testing as outlined in BDP4 Green Belt.</del></p> <p>BDP2.7 The 'village envelope' i.e. the defined settlement boundary for a village, is identified on the Policies Map and will remain unaltered until a review of the Green Belt is undertaken. Within the village envelope appropriate development will be limited to suitable infill plots. This applies to the following villages; Adams Hill, Belbroughton, Beoley (Holt End), Bournheath, Burcot, Clent, Fairfield, Finstall, Holy Cross, Hopwood, Lower Clent, Romsley and Rowney Green.</p> <p><b>[Table 2 (page 20) District's Settlement Hierarchy: Layout and design to clarify that table 2 falls within policy BDP2]</b></p>
MM10	20	BDP2 table 2 2 <sup>nd</sup> Column – Large Settlements	<p>Alvechurch Barnt Green (<i>including Lickey</i>) Catshill Hagley Rubery Wythall (<i>including Drakes Cross, Grimes Hill and Hollywood</i>)</p>
MM11	20	BDP2, Table 2 3 <sup>rd</sup> Column	<p><del>Suitable development</del></p> <p><del>Comparison and convenience retail (to meet District requirements and needs)</del></p> <p><del>Commercial leisure – restaurants, cafes pubs and bars</del></p> <p><del>Office</del></p> <p><del>Residential development of a scale proportional to the sustainability of the settlement</del></p> <p><del>Hotels/guest houses</del></p> <p><del>Employment</del></p> <p><del>Leisure/culture i.e. churches, health centres, libraries, public halls etc</del></p> <p><del>Major services</del></p> <p><del>Convenience A1 retail (to meet needs of the specific village)</del></p> <p><del>Local services</del></p> <p><del>Residential development of a scale proportional to the sustainability of the settlement</del></p> <p><del>Small scale business/office development</del></p> <p><del>Leisure/culture i.e. churches, health centres, libraries, public halls etc</del></p> <p><del>Housing to meet local needs (through rural exception sites in appropriate</del></p>

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			circumstances). Where a proposed site is within the boundaries of a settlement, which is not in the Green Belt, a local need for housing would not need to be justified Local services Small scale rural employment in appropriate circumstances. More limited local services for example, local convenience shop/post office or public house
MM12	20	BDP2 Table 2 – Small settlement	Small 'Settlement' <sup>10</sup> (population circa 50-2500) <del>10. Villages highlighted in blue are subject to a village envelope</del>
MM13	21	BDP3 8.19	The Worcestershire Strategic Housing Market Assessment 2012 (SHMA) analyses the current housing market and assesses future demand and need for housing within each local authority across the County. In determining the potential housing requirement for the District a range of scenarios were tested with the most realistic being a migration led and employment constrained scenarios which identified a net dwelling requirement for the period 2011-2030 of 6,980 and 6,780 respectively. <i>However to ensure the evidence is robust and up to date further demographic forecasts have been completed. Based on the demographic scenarios run, it is considered that the figure of 6,648 would represent the Objectively Assessed housing need and a figure of 7,000 over the period 2011-2030 meets the full housing requirement of the District. The Council is committed to significantly increasing the supply of housing to meet need and demand. On this basis a housing target of 7,000 is proposed for the 19 year plan period.</i>
MM14	21	BDP3 8.21	The NPPF highlights that windfalls can now be included in 5 year land supply calculations where there is compelling evidence that windfalls have consistently become available and will continue to do so in the future. A separate paper entitled '5 Year Land Supply in Bromsgrove District' highlights that an allowance of <del>30-40</del> dwellings per annum should be included.
MM15	21	BDP3 8.22	The sites and associated development trajectories identified in the SHLAA highlight that approximately <del>4,600</del> 4,700 homes will be delivered in the period <del>up to 2023</del> over the plan period without development in the Green Belt. This equates to the equivalent of a <del>12-7</del> years supply of land that can be delivered without the need to alter Green Belt boundaries. Previous versions of the SHLAA have indicated that only 4,000 homes could be developed on non-Green Belt land. This increase of <del>600</del> 700 is primarily due to the inclusion of a windfall allowance. The breakdown of the types of sites contributing to the <del>4,600</del> 4,700 total is detailed in the table below:
MM16	21	BDP3 table	Source of Supply No. of Dwellings Net Completions (2011-136) 1124 <del>386</del>

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			<p>Net Commitments <i>1092 12 1052</i></p> <p>Bromsgrove Expansion Sites <i>1790 2106</i></p> <p>Remaining Development Sites <i>66 479</i></p> <p>Other SHLAA Sites <i>97 421</i></p> <p>Windfall Allowance <i>560 (40 x 14 yrs) 480</i></p> <p>TOTAL: <i>4729 4624</i></p>
MM17	21	Footnote 12 page 21	12 This figure includes the development sites at Selsdon Close (Wythall), St. Godwalds Road (Bromsgrove), Birmingham Road (Alvechurch), Kendall End Road (Barnet Green), Kidderminster Road (Hagley) , and Bleakhouse Farm (Wythall) and Norton Farm (Bromsgrove).
MM18	21	BDP3 8.23	It is clear <del>ly essential</del> that a full Green Belt Review <i>will be required is undertaken</i> following the adoption of this Plan to ensure that land can be identified and allocated <i>via a Local Plan Review</i> to ensure that the remaining <del>2,400</del> <i>2,300</i> homes can be delivered <i>and additional sites then allocated in a Local Plan Review. The timing of this review will be determined by updated evidence such as, the GBSLEP Strategic Housing Needs Study and the monitoring of housing delivery against the Council's projected housing trajectory. This will ensure guarantee</i> that land can be identified and allocated to ensure that the remaining <del>2,400</del> <i>2,300</i> homes can be delivered. This will ensure that the Council is in a position to achieve the housing target of 7,000 by 2030.
MM19	22	BDP 3 Future Housing and Employment Growth table	Dwellings outside Green Belt <del>4600-4700</del> Green Belt Review <del>2400-2300</del>
MM20	22	8.25	As mentioned above the Council has a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities. New housing is considered to be a strategic priority which Redditch Borough Council are unable to fully address within their own administrative boundary and require help immediately to achieve, and then maintain, a 5 year supply of housing land. Land has been identified within Bromsgrove District to deliver 3,400 homes to enable Redditch Borough to achieve their housing target of 6,400. Bromsgrove Council is also aware that Birmingham City Council may require assistance in achieving their housing target. The amount of development required is not yet known <del>but the need for this housing is not immediate</del> . Bromsgrove is also already helping to meet the growth needs of Birmingham with the 700 houses currently being developed on the former MG Rover plant at Longbridge. It is therefore considered that cross-boundary growth in relation to Birmingham is already being partly addressed and can be further addressed through the full Green

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			<i>Belt and Local Plan Review.</i>
MM21	22	BDP3 (table)	Dwellings outside the Green Belt 4,600 2011-2023/30
MM22	22	BDP3.1	<del>It is proposed that prior to 2023 a</del> A full Green Belt Review will <del>have been completed</del> <i>be carried out</i> and further sites will <del>have been</del> <i>be allocated within a Local Plan Review</i> to contribute approximately 2,400 dwellings towards the 7,000 target. <i>The timing of this this review will be determined by updated evidence including the GBSLEP Strategic Housing Needs Study and the monitoring of housing delivery against the Council's projected housing trajectory.</i>
MM23	22	BDP 3.3	The Council will seek to maintain a 5 year supply of deliverable sites plus an additional buffer of 5% moved forward from later in the plan period <del>(or 20% where there has been persistent under delivery of housing).</del>
MM24	23	BDP4 8.28	<del>In advance of 2023, a</del> A Green Belt Review will <i>therefore</i> be undertaken <del>which will remove and then through a review of the Local Plan</del> sufficient land <i>will be removed</i> from the Green Belt to deliver the remaining 2,400 homes in the period <del>up to 2023-2030</del> and address the longer term development needs of Bromsgrove District and adjacent authorities based on the latest evidence at the time. <i>The timing of this review will be determined by updated evidence including the GBSLEP Strategic Housing Needs Study and the monitoring of housing delivery against the Council's projected housing trajectory.</i> The Green Belt Review will take account of: the need to accommodate 2,400 dwellings in the period up to <del>of 2023 to 2030</del>
MM25	23	8.29	<del>The Green Belt Review will follow the approach in the settlement hierarchy (BDP2) for Bromsgrove related growth as follows:</del> <ul style="list-style-type: none"> <li>• <del>Significant growth in Bromsgrove Town</del></li> <li>• <del>Some growth in large settlements</del></li> <li>• <del>Limited opportunities for growth in small settlements</del></li> </ul>
MM26	24	BDP4 8.31	The Green Belt Review will also consider all land along the northern boundary of the District that adjoins the West Midlands conurbation to meet any growth needs arising from the conurbation. At this stage the quantum of development required is not yet known, however the Council is working with the local authorities in the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) under the duty to co-operate to address this issue. <i>The ongoing GBSLEP Strategic Housing Growth Study will provide further evidence to help address this matter.</i>
MM27	24	8.34	<del>The NPPF states that the extension or alteration of a building in the Green Belt is not inappropriate provided that it does not result in disproportionate additions over and above the size of the original building</del> <i>permits proportionate extensions to all building in the Green Belt.</i> In terms of residential dwellings this is interpreted by the Council as extensions up to a maximum increase of 40% of the original dwelling or a maximum total floor space of up to 140m <sup>2</sup> (i.e. the original dwelling plus extension). <i>However, the Council acknowledges that a greater degree of extension may be allowed</i>

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			<del>under Permitted Development rights. Only extensions built before 1st July 1948 (the date of the first modern Planning Acts), should be considered to be part of the original dwelling. For the purpose of calculating the floorspace, only existing curtilage buildings located within 5 metres from the original dwelling house will be treated as forming part of the dwelling. New curtilage buildings located more than 5 metres from the dwelling house will normally be treated as inappropriate development. Any proposed extensions above the identified thresholds will be viewed as inappropriate development and would therefore only be permitted where very special circumstances exist.</del>
MM28	25	BDP4.2	A Local Plan Review including a full Review of the Green Belt will be undertaken <i>accordance with policy BDP3 in advance of 2023</i> to identify...
MM29	25	BDP4.2	a) Sufficient land in sustainable locations to deliver approximately 2,400 homes in the period <i>up to 2023-2030</i> to deliver the objectively assessed housing requirement for Bromsgrove District. b) Safeguarded land for the period 2030-40 to meet the development needs of Bromsgrove <i>District</i> and adjacent authorities based on the latest evidence;
MM30	25	BDP4.2	c) Land to help deliver the objectively assessed housing requirements of the West Midlands conurbation within the current plan period ie. up to 2030. <i>The timing of the Green Belt Review will be determined by updated evidence including the GBSLEP Strategic Housing Needs Study and the monitoring and housing delivery against the Council's projected housing trajectory. The outcomes of the Green Belt Review will then be incorporated into the Local Plan Review.</i>
MM31	25	BDP 4.3	BDP4.3 The Green Belt boundary review will follow <i>sustainable development principles</i> <del>the approach in BDP2 Settlement Hierarchy</del> and take into account <i>up to date</i> evidence and any proposals in Neighbourhood Plans. Where appropriate, settlement boundaries and village envelopes on the Policies Map will be revised to accommodate development.
MM32	25	BDP 4.4 b)	b) Appropriate facilities for outdoor sport, <del>and outdoor recreation, and for cemeteries, and for other uses of land</del> which preserve the openness of the Green Belt and do not conflict with the purposes of including land in it;
MM33	25	BDP4.4 c)	c) Extensions to existing residential dwellings up to a maximum of 40% increase of the original dwelling or increases up to a maximum total floor space of 140m <sup>2</sup> ( <i>'original' dwelling plus extension(s)</i> ) <i>provided that this scale of development has no adverse impact on the openness of the Green Belt;</i>
MM34	25	BDP4.4 e)	e) The replacement of a building of <del>, built with the intention of being permanent,</del> provided the new building is in the same use and should not be materially larger than the <del>original</del> building <i>it replaces</i>
MM35	27	BDP5A 8.51	It is preferable for the three expansion sites to include a small number of large play areas rather than a larger number of small play areas. This will enable a wider range of play equipment to be provided in selected locations that will be easier to maintain. It is however, important that all residents have access to such a facility within a 10 minute walk. The exact amounts of open space required on each site will depend upon the amount and type of



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			<p> dwellings proposed. Whilst the Council would expect the vast majority of provision to be provided on-site, some off-site commuted sums may be appropriate where a better outcome can be achieved through improvement or expansion of existing facilities such as at Sanders Park.</p> <p><i>The Perryfields Green Infrastructure Concept Plan identifies the green infrastructure assets and spatial patterns that give rise to opportunities for a connected and multifunctional green infrastructure network in BROM2. The development principles demonstrate how best practice for the development and management of green and blue infrastructure can be applied on the ground and the Council expects the principles be applied to inform the detailed masterplanning in BROM2.</i></p>
MM36	27	8.52	<p>8.52 The development of these sites would make a significant contribution towards delivering locally identified housing targets. However, it is critical that in order to achieve these targets that new housing addresses local need rather than encouraging further in-migration into the District. Therefore detailed development proposals will need to conform with other policies in the Bromsgrove District Plan that focus on the delivery of 2 and 3 bedroom units and up to 40% affordable housing. Evidence gathered also identifies a need in the District for housing suitable for the elderly and this site provides an opportunity to address this need. <del>Whilst building to Lifetime Home Standards ensures homes are compatible for the elderly</del> There is also a need for more specialised accommodation such as an ‘extra care’ village that offers varying degrees of residential care. It is not only the type and size of dwellings that are important, they must also be of high quality design and be constructed in a sustainable way to maximise energy efficiency, embrace opportunities for renewable energy use and provide good accessibility to existing and/or proposed community facilities.</p>
MM37	28	BDP5A 8.54	<p>The proximity of the motorway means that air and noise quality will be an issue that requires further investigation and mitigation. The sites (particularly BROM 1) are also located near to an Air Quality Management Area (AQMA) at junction 1 of the M42. The design of any new development will need to take the existence of the AQMA into full consideration to avoid any additional adverse impact.</p> <p><i>The three sites have a sensitive hydrogeological setting<sup>15</sup>. They fall within Source Protection Zones 1, 2 and 3 and there are qualitative and quantitative issues associated with the groundwater body and receiving river water body (the Battlefield Brook). BROM3 also has historic landfill<sup>16</sup>. The chemical and quantitative status of the groundwater body is poor under the Water Framework Directive (WFD) and the aquifer below the site is over abstracted which is causing low flows in the Battlefield Brook. Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to controlled waters and address the environmental impact</i></p>

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			<p>associated with over abstraction. For example, to achieve the water quality objective of the WFD, SuDS on the sites may need to provide multiple levels of treatment. To address the quantitative issues with the waterbodies, SuDS should be designed so to maximise recharge to the aquifer and support water levels in the Battlefield Brook. The development principles in the blue infrastructure section of the Perryfields Green Infrastructure Concept Plan are also applicable to BROM3.</p> <p><sup>15</sup>Map of the extent of the Source Protection Zones and location of landfill is available at: <a href="http://maps.environment-agency.gov.uk">http://maps.environment-agency.gov.uk</a></p> <p><sup>16</sup>Map of the sites geology is available at: <a href="http://mapapps.bgs.ac.uk/geologyofbritain/home.html">http://mapapps.bgs.ac.uk/geologyofbritain/home.html</a></p>
MM38	29	BDP5A.2	Of this total allocation BROM1 will include <del>approximately a minimum of</del> 316 dwellings and associated community infrastructure <del>that</del> including public open space with play facilities.
MM39	29	BDP5A.3	BROM2 will contain <del>approximately a minimum of</del> 1300 dwellings, 5 hectares of local employment land (office and/or light industry), a local centre and community facilities.
MM40	29	BDP5A.6	BROM3 will include <del>approximately a minimum of</del> 490 dwellings and associated community infrastructure that should include public open space with play facilities and small scale local retail
MM41	29	BDP5A.7 b)	b) To address the housing needs of the elderly <del>all dwellings should seek to achieve Lifetime Homes' Standards and</del> BROM2 should contain an 'extra care' type facility of approximately 200 units;
MM42	30	BDP5A.7	<p>i) The sites will have an overall strategy for green infrastructure (incorporating SuDS and blue infrastructure) that maximises opportunities for biodiversity and recreation throughout, creating a green corridor around the Battlefield Brook (BROM2) and in the case of BROM3, links to Sanders Park. <i>The Council will expect the Perryfields Green Infrastructure Concept Plan be applied to inform the detailed masterplanning in BROM2;</i></p> <p>j) Important biodiversity habitats and landscape features should be retained and enhanced with any mitigation provided where necessary. There should be no net loss of hedgerow resource within the sites. Full account should be taken of protected and notable species (e.g badgers, reptiles, water voles and bats);</p> <p><i>k) An appropriate assessment of the pollution risks to controlled waters will be produced taking account of any previous contaminative uses on the sites (including the historic landfill) and the risks associated with the proposed uses</i></p> <p><del>k) l) Flood risk from the Battlefield Brook on BROM2 and BROM3 should be managed through measures that work with natural processes to improve the local water environment addressed through flood management measures to</del></p>

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			<p>protect and enhance the District's watercourses and enable development appropriate to the flood risk;</p> <p><i>m) SuDS proposals must provide an appropriate level of treatment to avoid pollution risks to controlled waters, and be designed to achieve the greenfield rate of run-off and support water levels in the Battlefield Brook. and surface water run off must be managed to prevent flooding on and around all of the sites through the use of SuDS. In accordance with the objectives of the Water Framework Directive, development should ideally contribute towards the improvement of, but as a minimum not have a deteriorative effect on, the water bodies associated with the site; enhance, or at least not worsen, water quality</i></p>
MM43	32	BDP5B 8.65	<p>This site is located close to the boundary with Birmingham in the north western sector of the District. The site is approximately 6.66 hectares in area and is currently vacant. Restrictive covenants affect the site which limit both its use and developable area (See map 9). <i>A Flood Risk Assessment will be required to support any planning application proposing the development of this site which reflects the principles and recommendations within the Council's Level 2 Strategic Flood Risk Assessment.</i></p>
MM44	32	BDP5B 8.66	<p><b>Add text to end of paragraph:</b> <i>Any planning application proposing the development of the remainder of this site should be supported by a Flood Risk Assessment which reflects the principles and recommendations for the site within the Council's Level 2 Strategic Flood Risk Assessment.</i></p>
MM45	33	8.67	<p>Ravensbank expansion site; This site is located to the south/east of the existing Ravensbank employment site and is approximately 10 hectares in area, as indicated on map 8. The original employment site caters for Redditch Borough's needs and it is envisaged that this expansion site will provide additional capacity for Redditch's future needs on a similar basis. <i>The site is within the setting of Gorcott Hall, a Grade II* listed building. The Gorcott Hall Setting Assessment (Bromsgrove DC, 2014) has been prepared to inform the principle of development and its future form, and should be applied to ensure the significance of the Hall and its setting is conserved.</i> This site is part of the Redditch Eastern Gateway, a strategic employment site, which is being promoted by the Worcestershire Local Enterprise Partnership</p>
MM46	34	BDP 5B	<p><b>Insert Footnote:</b> <i>To ensure protection of Gorcott Hall's significance, future proposals should be in conformity with Policy BDP20 and informed by an understanding the Hall's setting, mindful of the Gorcott Hall Setting Assessment (Bromsgrove DC, 2014) and English Heritage guidance on setting matters. Historic Environment Good Practice Advice Note 3 (GPA3) The setting of Heritage Assets (Historic England, March 2015) <a href="http://historicengland.org.uk/images-books/publications/gpa3-setting-of-">http://historicengland.org.uk/images-books/publications/gpa3-setting-of-</a></i></p>

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			<i>heritage-assets/</i>
MM47	43	RCBD1.3	Site 1 Foxlydiat is located to the north western side of Redditch within the Parish of Bentley Pauncefoot and will provide opportunities to improve facilities and services in the wider Webheath area. It also offers the opportunity to extend existing bus services and through the provision of facilities within development has the potential to reduce the need to travel. <i>The site has a sensitive hydrogeological setting and the aquifer below the site is over-abstracted. There are Source Protection Zones<sup>23</sup> 1, 2 and 3 located on the site and the historic landfill<sup>24</sup> presents a potential source of contamination. Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to controlled waters and maximise recharge to the underlying aquifer. For example, to achieve the water quality objective of the WFD, SuDS on the site may need to provide multiple levels of treatment to avoid pollution risks. To address the quantitative issues with the groundwater body SuDS should be designed so to maximise recharge to the aquifer.</i>
MM48	45	RCBD1.6	Two mixed use urban extensions are proposed (as shown on Map 10 RCBD1 page 44) across two sites adjacent to Redditch and are appropriate to deliver a minimum of <i>approximately</i> 3400 dwellings and comprehensive provision of associated new infrastructure to meet some of Redditch's housing requirements up to 2030.
MM49	45	RCBD1.7	Site 1 Foxlydiat will include a <del>minimum of</del> <i>approximately</i> 2800 dwellings, a first school and a Local Centre, including associated community infrastructure.
MM50	45	RCBD1.8	Site 2 Brockhill will contain a <del>minimum of</del> <i>approximately</i> 600 dwellings which will integrate with the Strategic Site at Brockhill East, as shown in the Redditch Local Plan No.4 and should integrate well into the existing urban fabric of Redditch.
MM51	45-46	RCBD1.9	II. An overall Transport Assessment will be produced taking <del>into account of</del> <i>the prevailing traffic conditions and the individual and the cumulative and wide-ranging</i> effects of development on transport infrastructure. <i>This will define the mitigation necessary to protect the safety and operation of the road network, including sustainable travel measures and any including new and improved access arrangements. which are in keeping with the structured road hierarchy.</i>  III. Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both Site 1 Foxlydiat and Site 2 Brockhill, with all dwellings to be <del>located within 250m of</del> <i>accessible to the a bus network stop.</i>  VI. Flood risk from the Spring Brook on Site 1 Foxlydiat and the Red Ditch on Site 2 Brockhill East should be managed through measures that work with

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			<p>natural processes to improve the local water environment. <i>A detailed, site specific, Flood Risk Assessment will be required. This should provide a model of the nearby ordinary watercourses to ascertain the design flood extents, including the 1% plus climate change allowances, and determine the developable area of the site. This will inform the sequential approach and the need to include any necessary avoidance or mitigation measures such as the incorporation of open space and green infrastructure within the floodplain regime. Surface water runoff must be managed to prevent flooding on, around and downstream of both sites through the use of Sustainable Drainage Systems (SuDS).</i> <del>Surface water runoff must be managed to prevent flooding on, around and downstream of the both sites through the use of Sustainable Drainage Systems (SuDS).</del> A supporting risk assessment will be provided as SuDS techniques may be limited due to Source Protection Zones within Site 1 Foxlydiate.</p> <p><i>VII. SuDS proposals on Site 1 must provide an appropriate level of treatment to avoid pollution risks to controlled waters, and be designed to achieve the greenfield rate of run-off, maximise recharge to the underlying aquifer and support water levels in the Bow Brook. In accordance with the objectives of the Water Framework Directive, development should ideally contribute towards the improvement of, but as a minimum not have a deteriorative effect on, the water bodies associated with the site.</i></p> <p><i>VIII An appropriate assessment of the pollution risks to controlled waters on Site 1 Foxlydiate will be produced taking account of any previous contaminative uses on the site including the historic landfill, and the risks associated with the proposed uses</i></p> <p><i>VII.IX Proposals for development will need to ensure that sufficient capacity of the sewerage systems for both wastewater collection and treatment is provided through engagement with Severn Trent Water Ltd and the Environment Agency and delivered at the appropriate stage.</i></p> <p><i>X Supporting developments that follow the water conservation hierarchy: Where standards currently exist for a particular non-domestic building type in BREEAM, maximum points should be scored on water and a minimum of 25% water savings for any other development.</i></p> <p><i>VIII. XI. All development must be of a high quality design and locally distinctive to its surrounding rural and urban character; contribute to the areas' identity and create a coherent sense of place; and respect and enhance the setting of any heritage asset. There should be a continuous network of streets and spaces, including the provision of public open spaces, creating a permeable layout with well-defined streets.</i></p>

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			<p><del>IX. XII. In preparing</del> Development proposals <i>should incorporate</i>, provision <del>should be made</del> for any necessary infrastructure <i>to be delivered in parallel with the implementation of new development for the effective delivery of the site.</i></p> <p><del>X. XIII.</del> Any proposals for development on either site must not individually or cumulatively jeopardise the future use of any other part of the site (s) or impede the delivery of the two sustainable communities.</p> <p><i>XIV. To ensure the protection of Heritage Assets, future proposals including development boundaries should be in conformity with Policy BDP20 and informed by an understanding of the Setting of Heritage Assets set out in the most recent Setting Assessment(s) produced, or formally endorsed, by the Council in accordance with current Historic England guidance. Specifically, built development should not take place in the 'no development' areas identified in the Hewell Grange and Lanehouse Farm Setting of Heritage Assets Assessments (both dated December 2015).</i></p>
MM52	47	BDP6	<p><i>BDP6.1</i> Financial contributions towards development and infrastructure provision will be coordinated to ensure that growth in the District is supported by the provision of infrastructure (<i>including Green Infrastructure</i>), services and facilities needed to maintain and improve quality of life and respond to the needs of the local economy. This will be documented in the Infrastructure Delivery Plan.</p> <p><i>BDP6.2</i> Irrespective of size, development will provide, or contribute towards the provision of:</p> <ul style="list-style-type: none"> <li>• Measures to directly mitigate its impact, either geographically or functionally, which will be secured through the use of planning obligations;</li> <li>• Infrastructure, facilities and services required to support growth which will be secured through a Community Infrastructure Levy (CIL)</li> </ul> <p><i>BDP6.3</i> Contributions through CIL will be required once the charging schedule has been through an independent public examination and has been formally adopted by the Council. <i>Prior to this, contributions will be sought on a case by case basis in line with relevant policy and guidance.</i></p>
MM53	49	BDP7.1	<p>Proposals for housing must take account of identified housing needs in terms of the size and type of dwellings. To ensure mixed and vibrant communities are created development proposals need to focus on delivering 2 and 3 bedroom properties. On <del>large</del> schemes of 10 or more dwellings it is accepted that a wider mix of dwelling types <del>will</del> may be required.</p>
MM54	52	BDP8.1	<p><i>BDP8.1</i> Contributions towards affordable housing provision will not be sought from developments of 10 units or less, and which have a maximum combined gross floorspace of 1000 sqm. Where there is a net increase of 11 <del>40</del> or</p>

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			<p>more dwellings or the site is equal to or greater than 0.4 hectares, affordable housing provision will be expected on-site and will be calculated against the net number of new dwellings as follows:</p> <ul style="list-style-type: none"> <li>• Up to 40% affordable housing ( <i>or a higher % if proposed</i>) on greenfield sites or any site accommodating 200 or more dwellings;</li> <li>• Up to 30% affordable housing ( <i>or a higher % if proposed</i>) on brownfield sites accommodating less than 200 dwellings</li> </ul> <p>BDP8.2 In exceptional circumstances where the applicant can fully demonstrate that the required target cannot be achieved the Council may negotiate a lower provision.</p> <p>BDP8.3 The Council will seek to negotiate the mix of affordable housing tenures on individual schemes taking into account local needs, the housing mix in the local area and the impact on viability. A mix of the following tenures will generally be sought: Social rented; Intermediate housing; and Affordable rent</p> <p>BDP8.4 The affordable housing element of developments should focus primarily on the delivery of smaller units. However, there may be locations or changes in market conditions that warrant a different breakdown to deliver a scheme that best meets local needs in relation to the relevant settlement. The precise mix to be provided should be developed through discussions with the Strategic Housing Team.</p> <p><del>BDP8.5 To help meet the needs of the elderly all homes should be built to Lifetime Homes Standards in accordance with BDP10 Homes for the Elderly.</del></p> <p>BDP8.6 To create mixed and balanced communities affordable housing should be distributed throughout new developments and not be visually distinguishable from market housing.</p> <p>BDP8.7 When a development site is brought forward for planning consent on a piecemeal basis i.e. involving a parcel of land for development which is part of a larger site, Bromsgrove District Council will assess 'affordable housing' targets for each part of the site on a pro-rata basis having regard to the overall requirements generated by the whole site.</p>
MM55	53	8.116	<p>The settlement hierarchy (BDP2) <del>sets out the types of uses that are generally acceptable within each tier of the hierarchy.</del> It highlights that rural exception schemes are not appropriate in Bromsgrove Town or large settlements</p>
MM56	56	BDP10 8.125	<p><del>Lifetime Homes Standards are inexpensive, simple features designed to make homes more flexible and functional for all. In order to progressively encourage increased take up in new build projects, Lifetime Homes Standards are a key feature within the Code for Sustainable Homes and currently mandatory at level 6.</del></p>
MM57	56	8.126	<p><del>The Joseph Rowntree Foundation in association with the Habinteg Housing Association (lifetimehomes.org.uk) conducted a national comparative study into the cost of meeting both Building Regulations and Lifetime Home standards. The additional cost of building Lifetime Homes</del></p>

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			ranged from £545 to a maximum of only £1615 per dwelling, depending on the size, layout and specification of the property.
MM58	56	BDP10.2	The Council aims to ensure that older people are able to secure and sustain their independence in a home appropriate to their circumstances and to actively encourage developers to build new homes to the 'Lifetime Homes' standards, so that they can be readily adapted to meet the needs of those with disabilities and the elderly, as well as assisting independent living at home.
MM59	56	BDP10.3	The Council will, through the identification of sites and/or granting of planning consents in sustainable locations, provide for <i>the a wide range of elderly accommodation including the</i> development of residential care homes, close care, 'extra care' and assisted care housing; and in particular Continuing Care Retirement Communities which encompass an integrated range of such provision.
MM60	57	8.129	<del>The 2007 Gypsy and Travellers Accommodation Assessment (GTAA) identified that no additional pitches are required in the Bromsgrove District in the 5 year period between 2008 and 2013. The 2014 Gypsy and Travellers Accommodation Assessment (GTAA) shows that there is no overall shortfall of permanent pitches for Gypsies and Travellers across Worcestershire over the next five years up to 2018/19. Bromsgrove has sufficient capacity to cover identified requirements up to 2018/19. This reflects the historical low levels of demand for accommodation of this nature within the District. The more recent options consultation of the West Midlands RSS Phase 3 Revision highlighted a need of 3 pitches arising in the period up to 2017. Five additional pitches were completed at the Wythall site in 2011. Space for the additional pitches has come from converting the transit site, which has not been used as such for 19 years. The GTAA also identified that there is no need or demand for plots to be provided for travelling showpeople over the five year period 2014/15 to 2018/19</del>
MM61	57	8.130	<del>The needs of gypsies and travellers are also addressed in the County Housing Strategy and a further Gypsy and Travellers Accommodation Assessment has now been commissioned for the period beyond 2013. Whilst, in the short-term it is considered that current needs have been met, the 2014 GTAA indicates a need for permanent pitches after 2019/20. This situation could potentially change in the period up to 2030 once the new GTAA has been completed. Therefore, it will be necessary pertinent to consider whether sites for gypsies and travellers will need to be identified as part of the proposed Local Plan</del> Green Belt Review.
MM62	57	BDP11.3	If additional sites are required land will be identified through a <i>Local Plan</i> <del>full</del> Green Belt Review.
MM63	59	BDP12.2	<b>Add new paragraph:</b> <i>BDP12.3 When applying these tests to specific proposals the Council will have full regard to the specific characteristics, needs, service priorities and</i>



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			<i>objectives of the service and/or organisation concerned.</i>
MM64	67	BDP15.1 k)	Small scale renewable energy projects, <i>excluding wind energy developments</i> , and business to serve the industry
MM65	72	8.194	Transport Statements and Assessments should be fully informed by Guidance on Transport Assessment (DfT, March 2007) and Worcestershire LTP3 Requirements for Transport Assessments and Statements (March 2011) <i>or such relevant updates to these documents.</i>
MM66	73	BDP16.2	<i>Financial</i> contributions from developers will be sought for new development in respect of investment in public transport, pedestrian, cycle and highways infrastructure as detailed by the draft Bromsgrove Infrastructure Delivery Plan in conjunction with policy BDP6 Infrastructure Contributions
MM67	74-75	BDP17 8.201 & 8.202	<p><del>A Retail Capacity Assessment was completed in 2004 which was updated in 2007 and 2010. An update to the 2010 assessment is expected in 2013 to identify the retail needs for Bromsgrove District up to 2030. The most recent assessment will take into consideration new retail stores that had received Planning Consent, including Sainsbury's and Aldi. Key assumptions and data sources underpinning the 2010 update will be revisited in light of the current economic climate.</del></p> <p>The Bromsgrove Town Retail Capacity Assessment will include a household survey to inform the needs assessment; this provides an up-to-date picture of trading patterns. The tested assumptions will provide a forecast of comparison and convenience floorspace capacity in Bromsgrove over 5-year periods (2013, 2018, 2023 and 2028). Recommendations on the level of retail expansion that could be supported and the type and format of floorspace that can be accommodated will be provided. Over the plan period there is likely to be limited need for further convenience retailing floorspace. Whilst limited need, convenience retail development may support the viability of other schemes and may contribute to the regeneration of the town centre. In terms of comparison retail floorspace there is a likely need for additional comparison retail floor space up to 2030.</p> <p><i>A Retail Capacity Assessment was completed in 2004 which was updated in 2007 and 2010. An updated retail study was then published in October 2013 to identify the retail needs for Bromsgrove District to 2030. This assessment took in to consideration new retail stores that had received planning permission, including Sainsbury's and Aldi, the latter of which is complete and trading.</i></p> <p><i>The Bromsgrove Town Retail Capacity Assessment included a household survey to inform the needs assessment; which provided an up-to-date picture of trading patterns. The tested assumptions provided a forecast of comparison and convenience floorspace capacity in Bromsgrove up to 2030. The NPPF makes it clear that the identified need for retail uses should be</i></p>

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			<i>met in full and should not be compromised by limited site availability. As a result of the retail capacity assessment, it was concluded that there will in fact be a slight oversupply of convenience retail up to 2030 and a relatively small requirement for comparison floorspace of some 16,300m<sup>2</sup> (gross). Whilst limited need, convenience retail development may support the viability of other schemes and may contribute to the regeneration of the town centre. The retail assessment also surveyed local centres across Bromsgrove and did not suggest any major qualitative deficiencies and, in any case, most lacked major development opportunities. The study therefore recommended that most new development, particularly comparison goods floorspace, is directed towards Bromsgrove town centre, in order to consolidate its role as a centre which serves residents in the area immediately surrounding it.</i>
MM68	78	BDP17 8.223	The Spadesbourne Brook flowing through the town is an important natural asset. Parts of the Brook are naturalised, including areas between Birmingham Road and School Drive, and at the bus station. However, the majority of the Brook has been re-routed, culverted and effectively relegated to function as a storm drain through the Town Centre, hidden from view, and sometimes covered entirely by access roads to properties. <del>Even in its urban context the brook contains some plant and animal life, and the water quality is good and clear.</del> However it fails to provide any real amenity value for users of the Town Centre and its ability to support a wider variety of plants and animals is reduced by <i>poor water quality and its unnatural form.</i>
MM69	78	8.224	<b>Add new paragraph:</b> <i>Parts of the Town Centre Regeneration Area (including sites TC1, TC9 and TC10) are located in Flood Zone 2 (medium probability) and Flood Zone 3 (high probability) on the Environment Agency's Flood Map which, in this location, is based on a national, generalised mapping technique. This type of modelling does not include the impacts of structures such as culverts and bridges on the flooding regime. As the Spadesbourne Brook is currently impacted by long culverts, crossings and heavily engineered banks at the open sections, a detailed flood risk assessment (including hydraulic modelling) will be required for the delivery of sites within the flood risk areas. Such proposed redevelopment should also provide betterment and take the opportunity to re-establish an open and more natural river course with a simplification of the number of crossings.</i>
MM70	78	8.226	The Historic Market Site Proposals for a mixed use development are currently expected. The development proposals are expected to include shops, restaurants and a 5 screen cinema. <i>As the site is next to the Spadesbourne Brook where flooding is an issue, the design and layout of the development should be informed by a detailed flood risk assessment including hydraulic modelling.</i>
MM71	79	BDP17 8.236	This site functions as part of the Primary Shopping Zone and as such any redevelopment will be required to maintain retail uses on the ground floor, upper floors could be used for both residential and or office accommodation.

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			The route between Market Street and Bus Station into the High Street along Mill Lane is considered one of the key Town Centre gateway areas and as such development in this area should reflect this in the design of the public realm and the buildings that surround it. <i>This site is identified as a long-term redevelopment opportunity post 2031 and its risk of flooding will be assessed in the future strategic flood risk assessment. Should development come forward in this plan period, the design and layout of the development should be informed by a detailed flood risk assessment including hydraulic modelling.</i>
MM72	79	BDP17 8.237	The Council wishes to maintain a substantial element of employment opportunities in and around the Town Centre and as such the focus for any redevelopment of this site should be employment led. It is also acknowledged that flexibility needs to be introduced to enable businesses to operate in challenging economic circumstances such as those we <i>have recently faced</i> . <del>currently face</del> . Adjacent properties to the north, which are currently part of the existing Town Centre zone, may also offer wider opportunities for redevelopment, along with any proposals for the site identified above. <i>This site is identified as a long-term redevelopment opportunity post 2031 and its risk of flooding will be assessed in the future strategic flood risk assessment. Should development come forward in this plan period, the design and layout of the development should be informed by a detailed flood risk assessment including hydraulic modelling.</i>
MM73	81	BDP17.2.1	BDP17.2.1 Bromsgrove District has a likely need for additional comparison floorspace of <i>some 16,300m<sup>2</sup> (gross)</i> and limited need for further convenience floorspace up to 2030. Although where positive effects on the viability of regeneration schemes can be demonstrated, further convenience floorspace may be allowed in such circumstances.
MM74	81	BDP17.2.2	Bromsgrove Town Centre will continue to be the main retail centre of the District with extended Primary and Secondary Shopping Zones being the focus. As such: <ul style="list-style-type: none"> <li>a) A1 Uses will remain the predominant use for ground floor premises in the Primary Shopping Zone in order to maintain the retail vitality and viability of the Primary Shopping Zone and wider Town Centre.</li> <li>b) Other A class uses will be supported throughout the Secondary Shopping Zone. Development outside A Class Uses in Secondary Shopping Zones and will be considered where there is no adverse impact to the retail viability of the Town Centre.</li> <li>c) Retail development will be generally resisted in other areas of the designated Town Centre unless it can be demonstrated that proposals will not have an adverse impact on the viability and vitality of the primary or secondary shopping zones.</li> <li>d) <i>A wide range of appropriate Town Centre uses would be supported at first floor level in the Town Centre such as office, retail and residential.</i></li> </ul>

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			<p>The Council will:</p> <p>d-e) Continue to support markets in the Town Centre and provide for specific facilities within the public realm to ensure that a range of different markets can contribute to the overall vitality of the Town Centre.</p> <p>e-f) Support proposals to deliver high quality housing which provides a mix of unit sizes and tenure, contributing to the districts overall affordable housing provision. This includes retirement living accommodation on Recreation Road; development of vacant premises above shops on and surrounding the High Street; residential development within mixed use schemes.</p> <p>f-g) Continue to support small specialist shops, whilst creating opportunities for new retailers to enter the Town; and seek to offer new opportunities for people to work in the Town by providing an enhanced Town Centre which provides flexible business spaces available to accommodate a wide range of employment uses, as well as dedicated B1 office developments. Existing employment sites will be the focus of new employment developments.</p> <p>g h) Protect and enhance all existing public open spaces within the Town Centre with specific proposals for enhancements on The High Street, The Spadesbourne Brook and The Recreation Ground.</p> <p>h i) Seek to improve the range of the evening economy uses within the Town Centre, to include a mix of entertainment uses for all groups, including sport, leisure and culture, a choice of bars, cafes and restaurants. <i>There will be a focus on achieving a safe, balanced and socially responsible evening economy and therefore proposals must demonstrate that whether on its own or cumulatively with other uses, they do not create an unacceptable impact on neighbouring uses by reason of noise pollution, light pollution or disturbance.</i></p> <p>j) New opportunities for community events will be explored including community focused leisure and cultural development and potential for a new Civic Centre whether stand alone or part of a mixed use scheme.</p>
MM75	84	Table 5	<p>TC4 Parkside Middle School 0.7 <del>Office led</del> <i>Civic Centre</i> with public library and job centre <del>Application pending</del> Full Planning Permission</p> <p>TC9 Mill Lane 0.2 Retail led mixed use Long term opportunity <i>post 2030</i></p> <p>TC10 Worcester Road Employment Area 2.3 Employment led Long term opportunity <i>post 2030</i></p>
MM76	84	BDP17.8 TC1	<p>F. A flood risk assessment will be required to address flood risk from the Spadesbourne Brook and appropriate mitigation implemented where necessary. The watercourse must also be considered as part of the public realm element of any proposals, including provision for enhanced walking and cycling opportunities.</p> <p>I. An appropriate assessment of flood risk must be carried out including the hydraulic modelling of the Spadesbourne Brook through the site.</p>
MM77	85	BDP17.11	The former Parkside Middle School is a Grade II Listed Building and

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		TC4	<p>therefore would have to undergo sympathetic conversion <i>and extension</i> for development potential to be realised. The following development principles will apply:</p> <p>A. <del>Office conversion is considered to be the most suitable use, although other uses may be acceptable.</del> <i>Change of use to Civic Centre, library and job centre with other associated uses.</i></p> <p>B. Full regard to the buildings listed status will be essential for all proposals.</p> <p>C. Development will be required to contribute to the reinstatement of the avenue of lime trees on Market Street.</p>
MM78	87	BDP17.16 TC9	<p>BDP17.16 TC9 Mill Lane</p> <p><i>This site offers a longer term opportunity for retail led mixed use development to be informed by the future Strategic Flood Risk Assessment. It is envisaged that the following development principles will apply subject to the outcome of a flood risk assessment:</i></p> <p>A. At ground floor level A1 retail uses are to be the predominant use. <del>with</del> Upper floors suitable for office and residential uses <del>development.</del> <i>may be considered subject to the provision of safe flood free pedestrian access and egress</i></p> <p>B. The scale of retail development is to be determined although the scope to include larger retail spaces must be considered.</p> <p>C. Proposals must include details of public realm improvement on Mill Lane and the creation of an enhanced public space and would require a development which reflects the role of this space as a 'town square'.</p> <p>D. Spaces to the rear of the current buildings which are adjacent to the Brook must have full regard to the enhanced environment created by the naturalised Spadesbourne Brook.</p> <p><i>E. Development must be made safe without increasing flood risk elsewhere. Opportunities should also be sought through the design and layout for reducing flood risk in the area.</i></p> <p><del>E</del> F. The current pedestrian thoroughfare along Mill Lane will be protected in any development proposals.</p>
MM79	87	BDP17.17 & BDP17.18 TC10	<p><i>This site offers a longer term opportunity for employment based redevelopment to be informed by a future Strategic Flood Risk Assessment. It is envisaged subject to the outcome a flood risk assessment that P</i></p> <p>proposals for new employment uses will be supported within the existing employment allocation. Subject to BDP14 other uses may be acceptable where it can be demonstrated that they support the wider enhancement of the Town Centre and do not compromise the existing retail core of the Town Centre.</p> <p>Any major redevelopment proposals should reflect the linear nature of the Town with active frontages along Worcester Road, although opportunities exist for a wide range and scale of design approaches on other areas of the site. The eastern edge , bounded by the Spadesbourne Brook and Sanders</p>

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			Park must address these features <i>whilst taking the risk of flooding as identified by the strategic flood risk assessment into account</i> and where possible look to use these features as a positive design element. <i>Any development proposals must be made safe without increasing flood risk elsewhere. Opportunities should also be sought through the design and layout for reducing the flood risk in the area.</i>
MM80	89	BDP18.1	Within the areas defined on the Policies Map the District Council will allow proposals for retail development (Class A Uses) at ground floor level and retail, office, <del>or</del> residential use <i>or any other appropriate Town Centre use</i> at upper floor level.
MM81	92	BDP19 8.258	<i>One of the purposes of the planning system is to contribute to the achievement of sustainable development. Using sustainable design and construction techniques ensures that the environmental impacts of buildings are minimised as far as possible. Buildings of all types and sizes have the potential to reduce their impact on the environment, including by minimising their contribution to climate change and by using less resources. This also includes the use of sustainable building materials having regard to sourcing materials in a responsible way and use of materials which have a low embodied impact over their life including extraction, processing, manufacture and recycling. It is well understood that most development damages the natural environment and it is important that the resulting damage to the environment can be minimised. The Code for Sustainable Homes and BREEAM is a are the widely adopted tools for rating and measuring the sustainability performance of domestic and non-domestic buildings. In Bromsgrove, it is tested viable in the Affordable Housing Viability Study to require affordable housing development to meet the Code for Sustainable Homes Level 6, and market housing to meet Code Level 4 now, and to meet Level 6 by 2016. For non-residential development, the Council expects non-domestic development to meet the BREEAM 'very good' standard.</i>
MM82	92	8.261	<b>Design and criminal behaviour</b> 8.261 The reduction of crime, and the fear of crime and anti-social behaviour are identified as important issues for Bromsgrove in the Sustainable Community Strategy. Previous consultations show that most people favour the promotion of designing out crime initiatives. The Council therefore expects all development to <del>adhere to meet the 'Secured by Design' standard, unless it contradicts with</del> principles of good spatial design on site. Good crime prevention/ safety measures are also good counter terrorism protective security. For example, access control, blast resistant glazing and structural design can make unauthorised entry more difficult, and reduce casualties in case of gas explosion. So where relevant and appropriate, the Council will encourage developments in crowded locations, or those expected to become crowded, to take into account the design principles in Crowded Places: The Planning System and Counter- Terrorism and the relevant guidance.
MM83	94	BDP19.1	c) <del>Ensuring residential development achieves the highest standard of</del>

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			<p>Building for Life;</p> <p>d) <del>Ensuring all affordable housing to meet the Code for Sustainable Home Level 6 and all market housing to meet Code Level 4 now and Code Level 6 by 2016, or the equivalent level(s) as set out in the transitional arrangement of the national housing standards or other successor schemes; Encouraging the use of sustainable construction methods and materials;</del></p> <p>e. Ensuring all non-residential developments to meets BREEAM 'very good' standard <i>or other successor guidance</i></p> <p>l). <del>Encouraging</del> <del>Requiring</del> residential developments to provide sufficient functional space for everyday activities, meet people's needs and expectations from their homes, and to enable flexibility and adaptability. <del>through meeting the internal environment standards in Standards and Quality in Development: A good practice guide;</del></p> <p>e). <del>Ensuring developments meet the 'Secured by Design' standard</del> <i>Incorporating opportunities to design against crime and decrease fear of crime;</i></p>
MM84	94	BDP19.1	<p>r. Ensuring development is made suitable for the proposed final use, for instance, in terms of land contamination, <i>and does not create an unacceptable risk to controlled waters (where relevant)</i>. The Council will determine whether reports detailing for example, the site history; <i>a preliminary risk assessment, an appropriate remediation scheme and where appropriate; a site investigation and remediation scheme along with long term monitoring and maintenance proposals</i>, will need to be submitted in support of any planning application. Such reports will be prepared in accordance with best practice guidance.</p>
MM85	99	BDP20.12	<p>The District Council will update the current draft local list of assets <i>heritage list</i> and formally adopt it. It will include all Heritage Assets recognised as being of local importance, including those which are locally distinctive such as nailers cottages, assets associated with the scythe industry and assets associated with the use of the <del>Birmingham Worcester and Worcester</del> <i>Birmingham</i> canal which runs the length of the District, to name but a few.</p>
MM86	99	BDP20.13	<p>BDP20.13 The District Council will support development that:</p> <p>i. <del>Retains locally listed buildings.</del> <i>Heritage Assets on the Local List</i></p> <p>ii. Involves sympathetic alterations and extensions to <del>locally listed buildings</del> <i>Heritage Assets on the Local List</i></p> <p>iii. Does not have a detrimental impact on the setting or context of <del>locally listed buildings.</del> <i>Heritage Assets on the Local List.</i></p>
MM87	99	BDP20.14	<p>In considering applications that directly or indirectly affect <del>locally listed buildings</del> <i>Heritage Assets</i>, a balanced judgement will be applied having regard to the scale of any harm or loss as a result of proposed development and the significance of the <del>locally listed building.</del> <i>Heritage Asset.</i></p>
MM88	103	BDP21.1	<p>BDP 21.1 The Council will seek to achieve better management of</p>

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			<p>Bromsgrove's natural environment by expecting developments to:</p> <p>a) i) Protect <del>and, restore</del>, enhance <del>and create</del> core areas of high nature conservation value (including nationally and locally protected sites and irreplaceable nature resources, such as, sites with geological interest, ancient woodlands and habitats of principle importance). <del>wildlife corridors, stepping stones and buffer zones.</del></p> <p>ii) <i>Protect and create corridors and 'stepping stones'</i></p> <p>iii) <i>Enhance restoration areas</i></p> <p>iv) <i>Protect and create buffer zones- areas that protect core areas, restoration areas and 'stepping stones'</i></p> <p>v) <i>Ensure areas of land surrounding development are managed in a sustainable and wildlife friendly manner</i></p> <p>b) Take appropriate steps to maintain the favourable conservation status of populations of protected species.</p> <p>c) Protect, restore and enhance other features of natural environmental importance, <i>including locally protected sites</i>, in line with local environmental priorities.</p> <p><i>BDP21.2 In determining applications affecting sites of wildlife importance, the Council will apply the hierarchy of designated sites set out in the NPPF and appropriate weight will be given to their importance and contribution to wider ecological networks. Due to the national importance of Sites of Special Scientific Interest (SSSI) proposals likely to have an adverse impact within or outside of a SSSI, either individually or in combination with other developments, will not normally be permitted. An exception will only be made when it can be demonstrated that the benefits of the development clearly outweigh the impact on the site or network of sites.</i></p>
MM89	105	8.290	<p><b>Energy Efficiency in new buildings</b></p> <p><del>8.290 It is the Government's ambition for all new homes to be zero carbon by 2016 and new non-domestic buildings to be zero carbon by 2019/43. The Government's approach to achieve zero carbon home is through revising Part L of the Building Regulations and a new mechanism called 'allowable solutions<sup>44</sup>'. This approach is likely to be adopted by the Government to achieve the zero carbon non-domestic buildings target. To maximise the other benefits of carbon reduction in the District, the Council expects all allowable solutions to be linked with local projects (i.e. within Bromsgrove District) that would bring local benefits before projects outside of the District, then County and Region are considered. To maximise benefits of carbon reduction in the District, the Council expects every effort to be made to use sustainable building techniques and local and low-carbon materials. It is expected that the use of local materials will bring local benefits to the District and surrounding area.</del></p>
MM90	105		<p><del>In Bromsgrove, the viability of meeting the Code for Sustainable Homes standard was tested in the Affordable Housing Viability Study. The study found that it is viable for affordable housing development to meet the Code</del></p>



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			Level 6 by 2013 and for market housing, it is viable to meet Code Level 4 by 2013 and Code Level 6 by 2016.
MM91	105	Footnote 43	<del>43. The Government announced in Budget 2008 its ambition that new non-domestic buildings should be zero carbon from 2019 and seek views on the issue at the "Definition of Zero Carbon Homes and Non-Domestic Buildings: Consultation"</del>
MM92	105	Footnote 44	<del>44. Allowable Solutions is a new concept. The developer will make a payment to an Allowable Solutions provider, who will take the responsibility and liability for ensuring that Allowable Solutions, which may be small, medium or large scale carbon-saving projects, deliver the required emissions reductions. However, Code Level 5 requires the zero carbon target to be reached on site without the use of 'Allowable Solutions'</del>
MM93	106	Paragraph 8.295	8.295 To contribute to the carbon reduction target, the Council will support large scale low/ zero carbon energy generation projects when adverse impacts are addressed satisfactorily. For developments in areas where low carbon/ renewable resources/ opportunities are available and technically feasible, the Council will expect the development to incorporate the relevant technologies, such as photovoltaic and district heating network. Where there is a firm plan on the delivery of a <i>district heating supply</i> , <del>renewable/low carbon energy generation schemes, such as wind harvesting/turbines and combined heat and power or tri-generation</del> , developments nearby will be required to connect to these energy supplies. <i>Wind energy generation schemes, such as wind harvesting/ turbines will be considered against national policy and guidance.</i>
MM94	107	BDP 22 Climate Change	The Council will deliver viable low carbon climate resilient developments through: a. Encouraging development in existing buildings to achieve consequential energy efficiency improvements <del>b. Requiring allowable solutions to be linked with projects within the District in the first instance, followed by the County and then Region</del> b e. Ensuring developments and infrastructure are planned to avoid increased vulnerability to the range of impacts and take advantage of the opportunities arising from climate change, having regard to the intended lifetime of the development. Where developments and infrastructure are brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, c d. Ensuring developments are in locations well-served by public/ sustainable transport, existing local facilities and infrastructure. d e. Ensuring the construction and design of developments as well as future occupants of the developments will follow the energy, waste management hierarchies and other relevant guidance. Where relevant, developments must comply with the Worcestershire Waste Core Strategy. e f. Supporting developments to incorporate zero or low carbon energy generation technologies, especially installations that improve the energy

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			<p>security of developments in the rural areas. Where there is a firm delivery plan of a <i>district heating zero or low carbon energy generation</i> scheme, developments nearby are expected to provide infrastructure/ to connect to the zero/ low carbon energy <i>that</i> scheme.</p> <p>f g. Supporting zero or low carbon energy generation schemes, other than wind energy, when adverse impacts are addressed satisfactorily.</p>
MM95	108	8.306	<p>In terms of residential development, the Environment Agency Report states that getting existing homes retrofitted could reduce/ delay the need for new resource developments. It is tested in the Affordable Housing Viability Assessment that all market housing in the District can achieve Level 454 of the Code for Sustainable Homes by 2013 and Level 655 by 2016 and that affordable housing can achieve Code Level 6 from 2013 onwards.</p>
MM96	109	BDP23 8.309	<p>To ensure flood risk is minimised, the Council expects all developments to take account of flood risk from all sources (which should also include the impact of climate change) and follow the flood risk management hierarchy in PPS25 Development and Flood Risk Practice Guide, that is: 1) Assess; 2) Avoid; 3) Substitute; 4) Control; 5) Mitigate, when planning and designing development.</p> <p><i>Site-specific Flood Risk Assessments (FRAs) and drainage proposals should have regard to the guidance within the Council's Level 2 Strategic Flood Risk Assessment (SFRA) and take account of the effect of climate change on peak river flows and peak rainfall intensity as set out in Table 1 and Table 2 (respectively) of the Government's Climate Change Allowance guidance. This is available at: <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-changeallowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-changeallowances</a></i></p>
MM97	111	BDP 23.1	<p>The Council will deliver safe developments with low environmental impact through:</p> <p>a) Supporting developments that take into account of the Severn River Basin Management Plan and contribute to delivering the Water Framework Directive objectives.</p> <p>b) Supporting developments that follow the water conservation hierarchy. <del>All market housing developments should achieve at least the water category of the Code for Sustainable Homes Level 4 by 2013 and Level 6 after 2016. Affordable housing should at least achieve the water category of Code Level 6 from 2013 onwards.</del> Where standards currently exist for a particular non-domestic building type in BREEAM, maximum points should be scored on water and a minimum of 25% water savings for any other development.</p> <p>c) Ensuring development addresses flood risk from all sources, follows the flood risk management hierarchy when planning and designing development, and does not increase the risk of flooding elsewhere. Where inappropriate developments in areas at risk of flooding are necessary after the sequential test is applied, appropriate designs, materials and escape routes that minimise the risk(s) and loss should be incorporated.</p> <p>d) Requiring all developments to work with the Lead Local Flood Authority and SuDS Approval Body and pay necessary regard to the Local Flood Risk Management Strategy and its evidence.</p>

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			<p>e) Requiring all major developments to engage with Severn Trent Water at the earliest opportunity to ensure that sufficient capacity of the sewerage system (i.e. wastewater collection and treatment) is available to accommodate the development.</p> <p>f) Supporting developments that protect and enhance water quality. This includes ensuring the phasing of development is in line with the completion of the required infrastructure and non-mains drainage will follow the foul drainage hierarchy with appropriate management plans in place.</p> <p>g) Requiring developments to set aside land for Sustainable Drainage Systems (SuDS) and follow the SuDS management train concept. This includes maximising opportunities for restoring watercourses, deculverting, delivering multiple benefits in line with BDC24 Green Infrastructure and ensuring that an appropriate buffer zone is provided between the watercourse and any development.</p>
MM98	135	Appendix II Glossary	<p>Green Belt - Land allocated for a district to prevent urban sprawl by keeping land permanently open. Guidance on Green Belt policy is contained in <i>the NPPF PPG2</i>, and the <i>Policies Map Worcestershire Structure Plan</i> identifies the broad extent of <i>the</i> Green Belt within Bromsgrove District. <del>and the Local Plan defines detailed boundaries of Green Belt land.</del></p>
MM99	135	Appendix II Glossary	<p><b>Add new text:</b> <i>Infrastructure Delivery Plan (IDP) - The IDP is a key component of the evidence base to support the Bromsgrove District Plan. The IDP provides a baseline of the existing infrastructure capacity and needs in the District and highlights the infrastructure requirements to support the predicted growth set out in the Bromsgrove District Plan. The IDP provides a snapshot at the time of publication of the Proposed Submission Bromsgrove District Plan. Over the plan period, new funding opportunities will arise and, equally, infrastructure priorities may change. The IDP will be reviewed on an annual basis subsequent to the Local Plan's adoption to reflect these changes.</i></p>
MM100	138	Appendix IV	<p><b>Before table in Appendix 4 insert the following text:</b> <i>The following table sets out where policies in the Bromsgrove District Local Plan (BDLP) 2004 will be superseded by the Bromsgrove District Plan on adoption. Where terms such as 'partially replaced' and 'partially superseded' are used it simply means parts of BDLP policies were not considered necessary to carry forward as they are either no longer relevant or the level of detail will be addressed in a future Supplementary Planning Document. For clarification, no part of the BDLP will remain extant following the adoption of the Bromsgrove District Plan.</i></p>
MM101	152	Appendix VI	<p>New Supplementary Planning Documents: Design SPD To replace SPG1 Residential Design Guide (<i>to include evening and night-time economy</i>), SPG2 Shopfronts and Advertisements, SPG4 Conversion of rural Buildings and SPG5 Agricultural Buildings Design Guide.</p>