

FORM 1

NOTICE OF DELEGATION OF DECISION TO CABINET MEMBER BY STRONG LEADER

Section 15(4) of the Local Government Act 2000, the senior executive member may discharge any of the functions that are the responsibility of the Cabinet or may arrange for them to be discharged by another member of the Cabinet or Officer. On 1st December 2010, the Council adopted the Strong Leader Model for Corporate Governance 2011 as required under Part 3 of The Local Government and Public Involvement in Health Act 2007 (The 2007 Act).

I, Cllr Graham Ballinger, as Strong Leader, delegate the decision Bromsgrove Local Plan Review Update and Call for Sites Consultation as detailed in the Forward Plan to the Cabinet Member detailed below:

Cabinet Member for Economic Regeneration, Planning & Capital Investments: Cllr Fran Oborski MBE

Dated: 8th November 2019



Signed:

Leader of the Council

FORM 2

NOTICE OF DECISION OF CABINET MEMBER

Pursuant Section 15(4) of the Local Government Act 2000, as amended by section 63 of the Local Government and Public Involvement in Health Act 2007, the senior executive member may discharge any of the functions that are the responsibility of the Cabinet or may arrange for them to be discharged by another member of the Cabinet or Officer. On 1st December 2010, the Council adopted the Strong Leader Model for Corporate Governance 2011 as required under Part 3 of The Local Government and Public Involvement in Health Act 2007 (The 2007 Act).

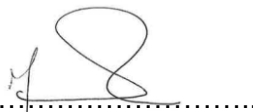
In accordance with the authority delegated to *me / by the Leader* (delete as appropriate), I have made the following decision:

Subject	Decision	Reason for decision	Date for Decision to be taken
Bromsgrove District Council Plan Review Update and Call for Sites Consultation	To agree the consultation comments to be submitted to Bromsgrove District Council in response to their Local Plan Review Update and Call for Sites Consultation.	As a neighbouring local authority, Wyre Forest District Council has been invited by Bromsgrove District Council to comment on the Plan Review Update and Call for Sites Consultation.	8 th November 2019

I confirm that the appropriate statutory officer consultation has taken place with regard to this decision.

Dated: 8th November 2019

Signed:



Councillor Fran Oborski MBE

Cabinet Member for Economic Regeneration, Planning & Capital Investments

WYRE FOREST DISTRICT COUNCIL

Strong Leader Report

Bromsgrove District Council Plan Review Update and Call for Sites Consultation

OPEN	
DIRECTOR:	Corporate Director: Economic Prosperity & Place
CONTACT OFFICER:	Daniel Atiyah
APPENDICES:	Wyre Forest District Council response to the Bromsgrove District Council Plan Review Update and Call for Sites Consultation

1. PURPOSE OF REPORT

- 1.1 To agree the consultation comments to be submitted to Bromsgrove District Council in response to their Local Plan Review Update and Call for Sites Consultation.

2. RECOMMENDATION

The Cabinet Member is asked to DECIDE that:

The consultation comments in Appendix 1 are approved.

3. BACKGROUND

- 3.1 Bromsgrove District Council is in the process of reviewing the Bromsgrove District Plan. The adopted plan did not allocate enough housing land in locations not covered by Green Belt designation. The review is required to ensure that at the very least the full housing requirement for Bromsgrove District up to 2030 can be delivered.
- 3.2 The purpose of this consultation is to identify the key strategic issues which will help guide the Bromsgrove District Plan Review and outline the next steps towards developing a preferred spatial strategy and accompanying policies for the plan period.

- 3.3 There are two documents that have been considered for response. One is the Green Belt Purposes Document, which is a strategic assessment of the Bromsgrove Green Belt against the NPPF Green Belt purposes. The second is the Employment Land Need Analysis which has developed a series of employment land need scenarios.
- 3.4 As Bromsgrove District Council is a neighbouring local authority, Wyre Forest District Council has been invited to respond to the Plan Review Update and Call for Sites Consultation. This is to comply with Duty to Co-operate.
- 3.5 Wyre Forest District has strong linkages with Bromsgrove District in terms of employment, transport, water management and economic development.

4. KEY ISSUES

- 4.1 The policy specific comments are set out in the consultation response in Appendix 1.
- 4.2 The key issues include the following:
- The Greater Birmingham and Black County Housing Market Area and the potential allocation of houses in Bromsgrove District to assist in meeting the shortfall.
 - The potential of higher employment land allocation within Bromsgrove District due to the district's good transportation links and central sustainable location to both Birmingham and the Black Country.
 - The importance of the role of the Green Belt in safeguarding and preventing the towns of Bromsgrove and Kidderminster from merging.

5. FINANCIAL IMPLICATIONS

- 5.1 There are no financial implications arising from this report.

6. LEGAL AND POLICY IMPLICATIONS

- 6.1 The Council will aim to enter into Duty to Co-operate discussions with a view to completing a Statement of Common Ground.

7. EQUALITY IMPACT NEEDS ASSESSMENT

7.1 Not applicable.

8. RISK MANAGEMENT

8.1 The Council is at risk of not influencing the Bromsgrove District Council Plan if it fails to engage with consultations such as this.

9. CONCLUSION

9.1 As a neighbouring local authority, Wyre Forest District Council has been invited by Bromsgrove District Council to comment on the Plan Review Update and Call for Sites Consultation. Appendix 1 sets out WFDC's response.

10. CONSULTEES

10.1 Corporate Leadership Team.

11. BACKGROUND PAPER

11.1 Bromsgrove District Plan Review Issues and Options Consultation Document

<https://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/bromsgrove-district-plan-review.aspx>

11.2 Adopted Bromsgrove District Plan 2011-2030

<http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/the-bromsgrove-district-plan-2011-30/adopted-bdp.aspx>

12. APPENDIX 1

12.1 Wyre Forest District Council Response to the Bromsgrove District Council Plan Review Update and Call for Sites Consultation

Wyre Forest District Council Response to the Bromsgrove District Council Plan Review Update and Call for Sites Consultation

1) Wyre Forest District Council (WFDC) welcomes the opportunity to discuss Bromsgrove District Council (BDC) Plan Review Update and Call for Sites Consultation.

2) WFDC acknowledges the Bromsgrove District Council Employment Land Need Analysis. The currently adopted Bromsgrove District Local Plan identified 28 hectares of employment required up to 2030. WFDC referred to this employment land requirement in the previous 2018 consultation period. The WFDC representation has now been acknowledged in the BDC representations and officer response document on page 65 (Ref SI6, URN 29) in that *'An employment land needs assessment will inform the employment development proposals such as land allocations which are included in the Plan Review'*.

3) The Employment Land Need Analysis has three different employment land scenarios. The hybrid Labour Demand Scenario recommends an additional 8 hectares of employment land from 2018-2040. The population based projections suggest a minimum need of 1 hectare of employment land from 2018-2040. The aspirational growth scenario has a much higher projection of an additional 90 hectares of employment land from 2018-2040. It is concluded that a full Employment Land Review will be required to provide a detailed assessment of land and premises in Bromsgrove District.

4) Therefore the scenarios discussed do at present appear to be quite wide ranging. It is requested that the Full Employment Land Review clarifies the amount of employment land required. It is WFDC view that given Bromsgrove's central location, access to both M5 and M42 junctions and with the electrification of the rail line to Birmingham New Street, an allocation greater than the current 28 hectares of employment land is required and the current provision needs to be significantly increased. This is also discussed within the Issues and Options document (2018) in that *'M42 is an economic advantage which could be better used to supply chains feeding the West Midlands manufacturing economy.'*¹

5) It is noted that both the Employment Land Availability Assessment from Birmingham City Council (2018) and the West Midlands Industrial Strategy² (2019) identify a shortfall of available employment land. The industrial strategy quotes that the *'West Midlands Land Commission concluded that the 'shortfall of land for employment space is at least as pressing as the shortage of land for new homes, and possibly more so'*.

6) Bromsgrove has strong linkages to Birmingham and the greater West Midlands conurbation. In the West Midlands Functional Economic Market Area Study (2015) Bromsgrove has the 7th highest work out flow to Birmingham in the region of 9,996 per day³. This represents approximately 40% of all work outflows in the district⁴. Additionally Bromsgrove also has linkages to the Black Country with a combined 3,227 work out flow to Sandwell and Dudley authority areas. Bromsgrove is also part of

¹ Bromsgrove District Council Issues and Options (2018) p36

² <https://www.gov.uk/government/publications/west-midlands-local-industrial-strategy/west-midlands-local-industrial-strategy>

³ West Midlands Functional Economic Market Area Study (2015) Headline Findings p9

⁴ <https://www.nomisweb.co.uk/census/2011/WU03UK/chart/1132462331>

the Travel to Work Area as defined by the ONS as part of Birmingham rather than Worcester and Kidderminster. These are considered areas in which residents both live and commute to work⁵.

7) By offering high skilled employment in the district this could assist in reducing the discrepancy in earnings for Bromsgrove residents (£34,500 pa) to Bromsgrove employees (£25,800 pa)⁶. This could also reduce commuting out of the district for employment and will promote sustainable development, and additionally could also lower carbon emissions. Taken from the 2011 ONS data 70% of Bromsgrove residents commute out of the district for employment⁷. This is a staggering proportion of residents commuting out of the district for employment opportunities and must be having a negative impact on the transport network in neighbouring local authority areas.

8) Further to this it is recognised that Bromsgrove residents access regularly the retail and leisure facilities within WFDC. This includes retail within Kidderminster, the Severn Valley Railway, West Midlands Safari Park, the historic town centres of Stourport and Bewdley, and the Wyre Forest. It is also recognised that there is already a cross boundary transportation impact on schooling such as Chaddesley Corbett School, Winterfold House and Kidderminster College. Any proposed developments close to WFDC boundaries will undoubtedly have a cumulative impact on traffic within the district.

9) Road traffic passes through WFDC en route to other destinations, such as Shropshire, Herefordshire and mid Wales. Any transport evidence produced by Bromsgrove will need to consider this issue. Additionally any proposed developments within BDC could affect traffic levels on the A450, Mustow Green Island (A450 / A448), and Black Bridge (A449 / A450). Traffic from Hagley will be using the A450 to travel through WFDC to South Worcestershire and beyond. This will need to be assessed as part of the BDC transport modelling work. WFDC will also request BDC to assess any impact on Kidderminster and Blakedown railway stations.

10) WFDC would request an early consultation on this as part of Duty to Cooperate. It is also expected that BDC will work with both WFDC and Worcestershire County Council on transportation and school capacity levels through the Duty to Cooperate process. It is assumed that the current BDC Infrastructure Delivery Plan of 2013 will be reviewed and updated as part of the ongoing BDC plan review.

11) WFDC welcomes the Green Belt Purposes Document. This is to consider how the land that makes up the Bromsgrove Green Belt is currently fulfilling its purposes as Green Belt and to assess potential development sites against the NPPF purposes of the Green Belt. Three different purposes have been considered in the document; these are: 1- to check the unrestricted sprawl of large built up areas, 2- to prevent neighbouring towns merging into one another and 3- to assist in safeguarding the countryside from encroachment. They are all rated from No Contribution, Weak, Moderate, or Strong.

12) There are also two additional green belt purposes as outlined in the NPPF which have not been selected for review. One is to preserve the setting and special character of historic towns. It is

⁵ <https://ons.maps.arcgis.com/apps/MapSeries/index.html?appid=397ccae5d5c7472e87cf0ca766386cc2>

⁶ Bromsgrove District Council Issues and Options (2018) p34

⁷ Bromsgrove District Council Employment Land Need Analysis (2019) p16

considered that there is a considerable amount of development located between the historic core of Bromsgrove Conservation Area and the Green Belt so this purpose has little relevance for this document. The second purpose not selected is to assist in urban regeneration by encouraging the recycling of derelict and other urban land. It has been concluded that it will be difficult to establish the role of one specific land parcel within BDC over another in assisting urban regeneration, or to attribute specific evidence to this.

13) WFDC would query this methodology as the historic town purpose is used in both the WFDC's Green Belt Strategic Analysis (2016), and also within the SWDP's Green Belt Assessment Strategic Assessment of Green Belt Purposes (2018). This is consistent with the NPPF as outlined in paragraph 134.

14) The parcels adjacent to WFDC are listed in the below table. The details are taken from the appendix documents. All the parcels below contain land that is within WFDC. The appendix documents do not make this clear; the district boundary should be marked clearly on the maps and illustrated on the map legend to avoid any confusion. WFDC would like to remind BDC that land that is located within WFDC cannot be released from the Green Belt in a BDC Local Plan review. It is requested that this is amended for clarity.

Ref	Parcel	Size (ha)	Purpose 1	Purpose 2	Purpose 3
NW1	West of Hagley	410	Strong	Strong	Strong
NW2	South West of Hagley	70	No Contribution	Strong	Strong
NW3	SSW of Hagley	136	No Contribution	Strong	Strong
NW4	South of Hagley	573	No Contribution	Moderate	Moderate
W2	Dodford	1822	Strong	Moderate	Moderate

15) Parcels NW2, 3 and 4 are classified as no contribution to restricting the sprawl of large built up areas as they are not located near built up areas. Parcel W2 has only been classified as moderate for both safeguarding towns from merging and in assisting the safeguarding of the countryside from encroachment. The appendix document comments that the *'land parcel constitutes nearly half of the gap between Bromsgrove Town and Kidderminster Town and therefore constitutes the majority of the gap'*⁸. It is therefore requested that parcel W2 should be classified as strong for this purpose of preventing neighbouring towns from merging into one another.

16) Parts of the settlement of Chaddesley Corbett are within this W2 parcel. A conservation area of 7.7 hectares is located around the village. WFDC feels that it is important to maintain the character of Chaddesley Corbett as this is a tightly packed settlement with a definite beginning and end, set in open countryside. Additionally a neighbourhood plan was adopted in 2014 for the parish.

⁸ Bromsgrove District Council Appendix 3 Green Belt Parcel Proformas (2019) p5

17) It is recognised that a more detailed Green Belt assessment will be produced at a later date. Green belt release in Bromsgrove District will be required in order to fulfil housing need in the plan period, and WFDC are supportive of this approach. It is also recognised that Bromsgrove District Council is part of the greater Birmingham and Black Country Housing Market Area. The BHMA Strategic Growth study⁹ (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. This report also specifically lists the areas between Birmingham and Bromsgrove as potential areas for development. Additionally the Black Country Authorities currently has a projected 350 ha shortfall of employment land for the plan period 2014-2036¹⁰.

18) Due to the strong linkages BDC has to both the Birmingham and Black Country areas, cross boundary growth in Bromsgrove for housing and employment must be considered within this plan review update to help with the shortfall across the Birmingham and Black Country areas. Indeed this has already been committed to in the BDC adopted Local Plan (2017) in section BDP3 Future Housing and Employment Growth.

19) Wyre Forest District Council will welcome discussions with BDC through the duty to cooperate process to understand how Bromsgrove District will be helping to meet this shortfall along with addressing employment land need. WFDC will expect to see suitable robust transport evidence to establish any traffic impact on Wyre Forest District from proposed developments and where necessary a mitigation strategy.

⁹ Greater Birmingham HMA Strategic Growth Study (2018) p16

¹⁰ Black Country Urban Capacity Review (2018) p16