



**REGULATION 22 OF THE TOWN AND  
COUNTRY PLANNING (ENVIRONMENTAL  
IMPACT ASSESSMENT) REGULATIONS  
2011 (AS AMENDED 2015)**

**COVER REPORT AND SUMMARY:  
PROVISION OF FURTHER INFORMATION  
IN RESPONSE TO REQUEST FROM PINS  
DATED 22<sup>ND</sup> APRIL 2020 IN RESPECT OF  
APPEAL REF APP/P1805/W/20/3245111**

***OUTLINE PLANNING APPLICATION  
16/1132 FOR SITE A (LAND OFF  
WHITFORD ROAD) PROVISION OF UP TO  
490 DWELLINGS, CLASS A1 RETAIL LOCAL  
SHOP (UP TO 400 SQM), TWO NEW  
PRIORITY ACCESSES ONTO WHITFORD  
ROAD, PUBLIC OPEN SPACE,  
LANDSCAPING AND SUSTAINABLE URBAN  
DRAINAGE,***

***AND SITE B (LAND OFF ALBERT ROAD)  
DEMOLITION OF GREYHOUND PUBLIC  
HOUSE, PROVISION OF UP TO 15  
DWELLINGS, NEW PRIORITY ACCESS ONTO  
ALBERT ROAD, LANDSCAPING AND  
SUSTAINABLE DRAINAGE***

**ON LAND AT  
LAND OFF WHITFORD ROAD (BROM3),  
BROMSGROVE, WORCESTERSHIRE**

**ON BEHALF OF JOINT APPLICANTS**

**CATESBY ESTATES LTD AND**

**MILLER HOMES LTD**

**May 2020**

**OUR REF: PF/8885**

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2. Updated photo record to ES Volume 2 Appendix 14.2 – Aspect Landscape and Planning Ltd
3. Addendum to ES Volume 1 Chapter 15 Noise - RSK
4. New appendices to ES Volume 2 Appendix 15.1 – Day Time Noise Contour Map and 15.2 Night Time Noise Contour Map - RSK – Noise Impact Assessment
5. New ES Volume 2 Chapter 13 (Hydrology and Drainage) – Appendix 13.2 RSK
6. Addendum to ES Volume 1 Chapter 16 (Socio Economics) Framptons

## 1.0 INTRODUCTION

### *Introduction*

- 1.1 This 'Regulation 22 submission' relates to 'further information' as defined in Section 22(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended in 2015). The submission is made in respect of the Environmental Statement (ES) accompanying Planning Application reference 16/1132. The proposed development (in summary described as Whitford Road, Bromsgrove), to which the planning application relates, is summarised below:

*OUTLINE PLANNING APPLICATION 16/1132 FOR SITE A (LAND OFF WHITFORD ROAD) PROVISION OF UP TO 490 DWELLINGS, CLASS A1 RETAIL LOCAL SHOP (UP TO 400 SQM), TWO NEW PRIORITY ACCESSES ONTO WHITFORD ROAD, PUBLIC OPEN SPACE, LANDSCAPING AND SUSTAINABLE URBAN DRAINAGE, AND SITE B (LAND OFF ALBERT ROAD) DEMOLITION OF GREYHOUND PUBLIC HOUSE, PROVISION OF UP TO 15 DWELLINGS, NEW PRIORITY ACCESS ONTO ALBERT ROAD, LANDSCAPING AND SUSTAINABLE DRAINAGE*

- 1.2 The submission is made under Regulation 22 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended 2015) on the basis that Regulation 76 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 confirms that the 2011 Regulations continue to apply where an applicant has submitted an environmental statement prior to the commencement of the 2017 Regulations. This situation applies in respect of planning application 16/1132.

1.3 Planning application 11/1162 is currently the subject of an appeal against non-determination (ref APP/P1805/W/20/3245111). On 22<sup>nd</sup> April 2020, the Planning Inspectorate (PINS) notified the appellants that:

*Following examination of the ES, the Secretary of State notifies you by this letter, pursuant to Regulation 22 of the 2011 EIA Regulations, that, to comply with Schedule 4 of those regulations (Information for inclusion in environmental statements) the appellant is required to provide the following further information:*

- An updated Landscape and Visual Impact Assessment to take into account changes which may have occurred in the receiving environment since the original assessment (including the assessment of cumulative effects with other development);*
- A description of the extent to which application of the updated climate change allowances published in the Planning Practice Guidance are likely to affect the findings in the Flood Risk Assessment;*
- Updated baseline noise surveys (or justification to explain why the original data remains valid). It is noted that the noise assessment has been updated but this is based upon data collected during 2017;*
- An update of the socio-economic assessment taking into account changes to the local demographics, and capacity of local services and infrastructure (or justification to explain why the original data remains valid).;*
- The ES states that the Proposed Development would commence in 2017 and be completed by 2023. This should be revisited and updated to take into account the implications this may have for the future baseline scenarios and*

*the assessment of cumulative effects, (or justification should be provided to explain that the anticipated future baseline would remain unaffected); and*

- *A revised non-technical summary (NTS) incorporating all of the elements referred to above.*

1.4 This Regulation 22 submission is therefore a formal submission of the ‘further information’ in response to the Regulation 22 request for further information made by PINS. Accordingly, in accordance with of Regulation 22(2) this submission of ‘further information’ will be subject to the Regulation 22 consultation procedures as stipulated therein.

1.5 This report:

- introduces the ‘further information’ that is now submitted in respect of planning application 16/1132; and
- concludes with a non-technical summary of the additional information.

1.6 The report is structured as follows:

- Section 2 provides a summary of the Whitford Road application and provides the context for this Regulation 22 further information having regard to the relevant environmental information;
- Section 3 summarises the further information for the ES relevant to the planning application;
- Section 4 provides a non-technical summary and conclusions.

## 2.0 OUTLINE PLANNING APPLICATION 16/1132 – ES CONTEXT

### *Introduction*

2.1 The National Planning Policy Guidance (NPPG) provides direction on how a Local Planning Authority should ask for additional information in respect of Planning Applications that are submitted with an Environmental Statement. As planning application 16/1132 falls to be considered under the EIA Regulations 2011 (as amended) in the context of Regulation 76(2)(a) of the EIA Regulations 2017, reference has been made to the previous version of NPPG. Paragraph: 047 Reference ID: 4-047-20140306, the NPPG provided:

*“The local planning authority should check that the submitted Environmental Statement contains all of the information specified in Part II of Schedule 4 to the Regulations and the relevant information set out in Part I of that Schedule.*

*If the local planning authority considers that further information is required, they should ask the applicant to provide it (regulation 22). All information provided must be publicised and consulted on. Requests for further information should be limited to the “main” or “significant” environmental effects to which a development is likely to give rise and must be on relevant matters set out in schedule 4. The local planning authority, the Secretary of State or an Inspector may also require an applicant or appellant to produce evidence to verify and/or clarify any information in the Environmental Statement.*

*Additional information of a substantive nature submitted voluntarily by an applicant must be treated in the same way as information required by the local planning authority (see the definition of “any other information” in regulation 2(1)).*

*The 16 weeks time limit for determination of the Environmental Impact Assessment application continues to run while any correspondence about the adequacy of the information in an Environmental Statement is taking place.”*

- 2.2 In May 2019 the applicants provided the Council with a submission that comprised ‘any other information’ submitted voluntarily by the Applicant.

***Whitford Road Planning Application 16/1132***

- 2.3 On 30th November 2016, Catesby Estates and Miller Homes (the Applicants) submitted a planning application (16/1132) to Bromsgrove District Council (BDC) proposing development of new homes, a local shop and Open space on the western edge of Bromsgrove. An Environmental Impact Assessment (EIA) carried out by the Applicants has examined the potential effects that may occur in connection with its development. The findings of the EIA are reported in a document called an Environmental Assessment (ES).
- 2.4 The Council undertook a formal consultation exercise in respect of planning application 16/1132. This resulted in a number of responses from stakeholders which have been reviewed and taken into account.

2.5 It was necessary to provide an addendum to the ES to clarify queries raised by stakeholders following receipt of formal consultation responses to the originally submitted material and to provide additional information where necessary. These matters relate primarily to transport matters following receipt of additional traffic modelling data. It has been necessary to revise the air quality model to suit. As the Local Plan was now adopted the planning policy section was updated. The ES was therefore updated to take account of these changes. The November 2016 ES (as originally submitted) was superseded by the January 2018 ES. The complete Environmental Statement, as amended, was submitted to BDC. New information contained in the 2018 ES that is different from the November 2016 ES was identified by red coloured underlined text.

2.6 In May 2019 the Applicants made a voluntary submission of ‘any other information’ in respect of the ES in the form of a Regulation 22 Cover Report and Summary. This information related to ‘any other information’ relating to the following matters:

1. Addendum to ES Volume 1 Chapter 8 Transport
2. New ES Volume 2 Appendix 8.3 - WSP Transport Technical Note 4 – Stand Alone Assessment
3. New ES Volume 2 Appendix 8.4 - WSP Transport Technical Note 5 – Cumulative Assessment
4. Addendum to ES Volume 1 Chapter 9 Air Quality
5. New ES Volume 2 Appendix 9.1 - RSK – Air Quality Impact Assessment Addendum
6. Addendum to ES Volume 1 Chapter 15 Noise



7. New ES Volume 2 Appendix 15.1 - RSK – Noise Impact Assessment

8. New ES Volume 2 Appendix 11.2 – fpcr – Ecology Walkover Survey Report

2.7 The May 2019 Regulation 22 Cover Report and Summary introduced the ‘any other information’ that has been submitted since January 2018 in respect of planning application 16/1132; and concluded with a non-technical summary of the additional information.

2.8 A similar format is also followed in this current Regulation 22 Submission of ‘further information’.

2.9 **It is important to note that the ES relates solely to Site A (Land off Whitford Road) and all subsequent references to the 'Site' in the ES relate to Site A as shown on Figures 1.1 and 1.2.**

2.10 Although the proposals for Site B (Land off Albert Road) are included within outline application 16/1132, they are not assessed within the ES as the proposals do not give rise to any significant environmental effects. A separate suite of documents is provided to the Local Planning Authority to allow it to determine the Site B part of the application. These documents are referenced in the Planning Statement that accompanies the application.

2.11 For Site A - Land off Whitford Road, outline planning permission is sought for up to 490 dwellings, together with class A1 retail local shop (up to 400 sqm), two new priority accesses onto Whitford Road, public open space, landscaping, and

sustainable urban drainage. Planning application 16/1132 in respect of Site A is therefore accompanied by a freestanding Environmental Statement (ES) January 2018, as well as Non-ES material supporting the planning application, for example the Design and Access Statement

### **Other Issues Arising from Consultation Comments Received**

2.12 A number of issues have been raised in the form of representations and consultation responses from members of the public, neighbouring properties and businesses to the development proposals.

2.13 The Environmental Impact Assessment undertaken of the development proposals has been robust and carried out fully in accordance with the relevant EIA regulations. The objective of an EIA is to identify the “likely significant effects” of a proposed development. The assessment undertaken identifies that there are potential effects on a number of sensitive receptors, but with the incorporation of the suggested mitigation measures available, these would ensure that these effects would not be significant.

2.14 The provision of mitigation as outlined in the ES to deal with residual concerns surrounding matters such as transport, air quality, noise and ecology during both the construction and occupation phases can all be controlled via appropriately worded planning conditions attached to the grant of any subsequent planning permission – this is normal practice. It is also notable that no formal technical consultees have raised any objections to the proposals to date.

2.15 The design parameters and other operational assumptions have been used in order that a “realistic worst-case” has been assessed. The scope of the assessments undertaken was agreed with the local planning authority as set out in the EIA Scoping Opinion.

2.16 The applicants continue to liaise directly with those neighbouring properties and businesses and other interest groups that may potentially be most affected by the development proposals to seek to overcome their concerns.

2.17 This submission is made in response to the request from PINS dated 22<sup>nd</sup> April 2020 as noted above.

### 3.0 SUMMARY OF THE FURTHER INFORMATION

3.1 The 'further information' comprises as requested by PINS in respect of:

- further information on:
  - *Updated Landscape and Visual Impact Assessment to take into account changes which may have occurred in the receiving environment since the original assessment (including the assessment of cumulative effects with other development);*
  - *A description of the extent to which application of the updated climate change allowances published in the Planning Practice Guidance are likely to affect the findings in the Flood Risk Assessment;*
  - *Updated baseline noise surveys (or justification to explain why the original data remains valid). It is noted that the noise assessment has been updated but this is based upon data collected during 2017;*
  - *An update of the socio-economic assessment taking into account changes to the local demographics, and capacity of local services and infrastructure (or justification to explain why the original data remains valid).;*
  - *Proposed development programme taking the implications this may have for the future baseline scenarios and the assessment of cumulative effects, (or justification should be provided to explain that the anticipated future baseline would remain unaffected); and*
  - *A revised non-technical summary (NTS) incorporating all of the elements referred to above.*

- addendum Environmental Statement (ES) chapters, appendices and notes updated  
(as summarised in the Table below):

<b>Additional Work Undertaken</b>	<b>Implication to ES</b>
<p><b><u>Landscape and Visual Impact</u></b></p> <p>The ES Landscape and Visual Assessment Chapter 14 has been reviewed to determine whether the conclusions reached are still applicable.</p> <p>It is necessary to provide new text and Tables as a consequence of this work.</p> <p>However, the overall conclusions remain unchanged.</p>	<p>A technical Note has been produced providing an updated Photo Record contained within Appendix 14.2 of the ES.</p> <p>The Technical Note also updates any superseded or out of date published planning policy or documentation in Chapter 14 (Landscape and Visual Assessment) of the ES.</p>
<p><b><u>Noise</u></b></p> <p>The ES Noise Chapter 15 has been reviewed to determine whether the conclusions reached are still applicable.</p> <p>It is necessary to provide new text and Tables as a consequence of this work.</p> <p>However, the overall conclusions remain unchanged.</p>	<p>Addendum to Chapter 15 (Noise) of Volume 1 of the ES in the form of an updated Chapter.</p> <p>New appendices to the ES Chapter 15 as contained within Volume 2 of the ES.</p> <p>The new appendices are:</p> <p>Appendix 15.1 – Day Time Noise Contour Map</p>

	<p>Appendix 15.2 – Night Time Noise Contour Map</p>
<p><b><u>Hydrology and Drainage</u></b></p> <p>The ES Chapter 13 (Hydrology and Drainage) has been reviewed to describe the extent to which application of the updated climate change allowances in NPPG are likely to affect the findings in the Flood Risk assessment.</p> <p>It is necessary to provide a new Appendix 13.2 as a consequence of this work.</p> <p>However, the overall conclusions of the ES remain unchanged.</p>	<p>New Chapter 13 (Hydrology and Drainage) Volume 2 Appendix 13.2 of the ES in the form of an updated Appendix.</p>
<p><b><u>Socio-Economics</u></b></p> <p>The ES Socio economic Chapter 16 has been reviewed to determine whether the conclusions reached are still applicable.</p> <p>It is necessary to provide new text and Tables as a consequence of this work.</p> <p>However, the overall conclusions remain unchanged</p>	<p>Addendum to Chapter 16 (Socio economics) of Volume 1 of the ES in the form of an updated Chapter.</p>

## **Landscape and Visual Impact**

3.2 Aspect Landscape Planning Ltd have been instructed by the appellants to review the submitted Landscape and Visual Chapter (LVC) for the development at Whitford Road, Bromsgrove.

3.3 In light of the age of the submitted LVC it has been deemed appropriate to review this material to ensure that a no significant changes have occurred since the original submission. While there are not any anticipated changes to the application, there is a need to ensure that the application submission is up-to-date. The Technical Note attached as part of this submission carries out a review of the below;

- Further site visit and updated Photo Record contained within Appendix 14.2 of the ES.
- Updates to any superseded or out of date published planning policy or documentation; and
- A review of the submitted LVC and LVIA assessment.

3.4 As noted in the Technical Report both national and local planning policy have changed, however, they do not result in any increase in value and sensitivity of the site. The site is not subject to any qualitative landscape designations.

3.5 The conclusions within the LVC state that it is considered that the application site and receiving environment have the capacity to accommodate the proposals. The proposals will not result in significant harm to the landscape character or visual environment. As

such, it is considered that the proposed development can be integrated in this location and is supportable from a landscape and visual perspective.

- 3.6 Therefore overall, it is considered that the assessment and conclusions stated within the Landscape and Visual Chapter are in line with the updated national and local planning policy and that the effects stated within the LVC remain.

### **Hydrology and Drainage**

- 3.7 The effects of the construction and operational phases of the Proposed Development have been assessed in relation to Hydrology and Drainage in an updated ES Volume 2 Appendix 13.2. This Appendix demonstrates that the Proposed Development can be delivered without significant adverse effects, and the Parameters Assessment Plan can accommodate the provision for drainage of surface water. Consideration has also been given to the provision of foul water infrastructure to the Proposed Development. The assessment was based on the findings of the related Flood Risk Assessment.
- 3.8 The ES Volume 2 Appendix 13.2 report takes into account the recommendations of the NPPF and its associated Planning Practice Guidance. It confirms that the whole site is located within Flood Zone 1 and is acceptable in all other respects as to flood risk, such that this does not present a constraint to site development.
- 3.9 The Drainage Strategy demonstrates that the site can sustainably manage surface water arising from the development up to the 1 in 100 year +40% climate change storm event, with an 8% allowance for Urban Creep. The proposed attenuation basins and swale will



provide a suitable level of surface water treatment, prior to a restricted discharge from the site.

3.10 The FRA has been reviewed in the context of NPPF Objectives. It is concluded that:

- The proposed development will not be affected by current or future flooding from any source.
- The development will not increase flood risk elsewhere.
- The measures proposed to deal with the effects and risks are appropriate.
- The exception test is not required for this assessment as the whole development site is located within Flood Zone 1 and has a vulnerability classification of “more vulnerable”.
- Other sources of flooding have also been assessed and it has been found that there will be no increase in risk of flooding from land, groundwater, canals, reservoirs or sewers as a result of this development.
- There are no anticipated negative impacts associated with the proposed development. Positive social, economic and environmental impacts will result from the proposed development provided mitigation measures outlined in Section 6 of new Appendix 1.2 are adhered to.
- The FRA was prepared in line with the requirements of the NPPF.

3.8 The review of the Drainage Strategy concludes:

- The proposed on-site drainage strategy will be suitable to attenuate flows up to and including the 1 in 100+40% Climate Change rainfall event.
- Surface water discharge from the site is proposed to be limited to the greenfield runoff rate of 4.4 l/s/ha.

- Surface water for all events up to the 1 in 30 year (excluding highways) is to be disposed of via soakaways. Over and above this surface water attenuation will be provided within two attenuation basins located in the north east corner of the site.
- A swale is proposed to convey surface water flows and provide an additional stage of surface water treatment prior to discharge from the site.
- A surface water outfall is proposed to the Battlefield Brook located to the north of the site.
- The onsite sewers may be offered to Severn Trent Water for adoption under a Section 104 agreement.
- A foul water connection into the existing public sewerage network will be subject to Section 106 approval from Severn Trent Water.
- A connection into the Battlefield Brook may require consent from the Environment Agency.

3.11 In relation to Hydrology and Drainage there is not considered to be a cumulative effect of future development in addition to the Application Site.

3.12 A beneficial effect results from the reduced application of agricultural fertilisers and pesticides which under pre-development conditions may have entered the water environment. The introduction of new surface water drainage features as a result of the proposed drainage strategy results in a minor beneficial residual effect of minor significance.

### **Noise**

3.13 RSK Environment Ltd (RSK) was appointed by the appellants to undertake a review of d ES Chapter 16 in response to the PINS Regulation 22 request, it should be noted that the impact assessment of the proposed development is based on the incorporation of the road traffic noise data for the built (2021) development scenario and not the baseline data obtained in 2017. By adopting this approach, the assessment uses the most stringent interpretation of the input parameters to inform the assessment of operational impacts on existing and proposed (development) receptors. An updated baseline survey would therefore have no bearing on the outcomes of the previous and the updated Chapter 16 which is attached.

3.14 A revised version of the ES Chapter related to noise and vibration has been prepared, inclusive of the most recent traffic count data, planning policies/guidance, and one which offers further clarity on the Regulation 22 request.

3.15 The assessment utilises new noise propagation modelling using the revised traffic counts, to re-assess the site suitability (based on the 2021 development scenario) and changes in road traffic noise (short and long-term).

3.16 The assessment indicates that the residual effect of construction noise is considered to be temporary, and of minor adverse significance, assuming appropriate mitigation measures are incorporated.

3.17 Operational noise impacts, inclusive of road traffic noise and potential fixed plant are negligible and not significant in the long-term. A marginal exceedance in the short term

for road traffic noise impacts is calculated along three adjacent roads resulting in a minor adverse impact.

3.18 Based on mitigation imbedded within the design, particularly through the use of high specification double glazed windows and supplementary ventilation systems, the criteria for internal noise levels (within BS 8233: 2014 and WHO) of the proposed residential dwellings would be met.

3.19 The cumulative impact of the development in terms of noise is restricted to the impact of changing road traffic levels. Road traffic noise levels provided by the appointed traffic consultant have included the development plus further committed developments in the area, namely Perryfields. The assessment has been undertaken in accordance with the criteria outlined in DMRB.

### **Socio Economics**

3.20 A review and update has been undertaken by Framptons of Chapter 16 Socio-Economics of the Environmental Statement (January 2018) (ES) that accompanied the planning application for up to 490 dwellings, Class A1 retail shop (up to 400 square metres), two new priority junctions, public open space, landscaping and sustainable drainage at **Site A** (Land off Whitford Road): and, the Demolition of Greyhound Inn Public House, provision of up to 15 dwellings, new priority access onto Albert Road, provision for a new roundabout, landscaping and sustainable drainage; at **Site B** (Land off Albert Road).

- 3.21 This review and update is in response to a Regulation 22 of the 2011 EIA Regulation request from the Planning Inspector in pursuant of the submitted appeal reference APP/P1805/W/20/3245111.
- 3.22 The assessment in the January 2018 ES Chapter identified the following likely significant effects associated with the Proposed Development; effect on the demographics of the local area; effect of the proposed retail element of the Proposed Development; effect on the provision of education and health services. It is considered that the key areas considered in the assessment remain valid, with no other social or economic areas that would give rise to likely significant effects identified.
- 3.23 The January 2018 Chapter 16 Socio-economic effects concluded that there would be a **short to medium term, temporary, negligible** effect on population, housing, healthcare, open space and education during the construction phases of the Proposed Development.
- 3.24 The January 2018 Chapter 16 Socio-economic effects concluded that there would be a **major beneficial effect** on the demographic profile of the local area; a **minor beneficial effect** on the provision of employment opportunities; and, a **negligible effect on** existing local GP and dental surgery services; on the post construction phase of the Proposed Development.
- 3.25 This review has not identified any material changes to the baseline that would contradict this conclusion. The assessed of effects remain valid. The following sections set out the reasons for this conclusion

## Methodology

3.26 The review has included the following tasks; review of the key areas considered within the chapter to identify any other areas associated with socio-economics that could give rise to significant environmental effects; review of the baseline conditions; review of the likely significant impacts and mitigation identified; and, review of any residual effects.

3.27 The following sources of information have been used:

- Office for National Statistics (“ONS”);
- Official Labour Market Statistics (“NOMIS”);
- Bromsgrove District Council Annual Monitoring Report 2018/2019 (“AMR”);
- NHS Choices;
- Worcestershire Spring School Census 2019;
- Worcestershire Schools Capacity Collection 2018;
- Worcestershire Education Planning Obligations 2019

## **BASELINE CONDITIONS**

### Demographics, Housing Need and Economic Activity

3.28 The 2018 sub national population projections were published in January 2020. The projections show at 2018 the population of Bromsgrove was 98,662 (all ages) an increase of 4% from the 2013 ONS mid-year estimates (Source AMR 2014 and included in the January 2018 Chapter 16 Socio-economic).

3.29 The population of Bromsgrove is likely to increase, for all ages, by 16% to 114,463 by 2039. The ONS- 2018 based population projections show an increase in the population

projection at 2039, of 6,263 (5%) above the ONS-2014 based population projections (included in the January 2018 Chapter 16 Socio-economic).

**Table 16.1** Population, Household and Economically Active Statistics

Area	Total Pop.	Economically Active		Total Households	Households With no. cars		Average H'hold Size
		No.	%		No.	%	
Whitford Ward	4,840	2,696	55.3	1,953	248	12.7	2.48
Bromsgrove	93,400 98700	48,664 49,000	52.1 49	38,290	4,771	12.5	2.43
West Midlands	5,455,200 5,900,800	2,778,859 2,838,066	50.9 48	2,294,909	566,621	24.7	2.37
England	52,234,000 55,977,178	38,881,374 31,935,008	74.4 78	22,063,368	5,691,251	25.8	2.36

Source: Office of National Statistics, National Census 2011, elements in red Nomis 2018/2019

3.30 Table 16.1 Population, Household and Economically Active Statistics – has been updated to include the latest employment figures (NOMIS 2018-2019). The job density was 0.98 for Bromsgrove, 0.81 for the west midlands and 0.86 for Great Britain (NOMIS 2018-2019).

3.31 The Bromsgrove Annual Monitoring Report 2018/2019 (AMR) updated the employment land position within the District. The Local Plan includes 28ha of employment land to be readily available up until 2030. The AMR reported that 7.16ha of employment land has been delivered since 2011, which equates to 25.4% of the District's total employment land requirement. 0.30ha of employment land was completed on allocated employment sites in 2018/2019, and 0.13ha of employment land completed on previously developed land. All completions this monitoring year were in B1 use.

3.32 **Table 16.2** Population Age Structure (March 2011) has been updated to include any changes to the local population included in the ONS-2018 based population projections published in January 2020. The breakdown in the population age ranges remains similar for the ONS-2018 based population and the ONS-2014 based

population, which was used in the socio-economic assessment of the environmental effects of the development in the January 2018 chapter update.

**Table 16.2** Population Age Structure (March 2011) (Red text update to include ONS-2018 based population projections)

Age Group	Whitford Ward		Bromsgrove District 2018		West Midlands 2018		England 2018	
	Count	%	Count	%	Count	%	Count	%
Aged 0 – 19	1,148	23.8	21,023 21,758	22 22	1,391,931 1,435,631	24.9 24.3	12,712,275 13,241,287	24 23.7
Aged 20 – 44	1,457	30.1	26,570 26,811	28.3 27.2	1,853,840 1,889,125	33.1 32.0	18,190,473 18,224,242	34.3 32.6
Aged 45 – 64	1,445	29.8	26,909 27,925	28.7 28.3	1,410,101 1,486,765	25.2 25.2	13,449,179 14,332,396	25.4 25.6
Aged 65 +	790	16.3	19,135 22,168	20.5 22.4	945,975 1,089,236	16.9 18.5	8,660,529 10,179,253	16.4 18.2

3.33 Over the specific build period of the development (2022-2029) the working age population (20-64) will increase by 3%, those of the State Pension age will increase by 11% (development period hatched). In summary, over the build period, the population of Bromsgrove will increase by 5%.

**Table 16.1.1** ONS-2018 based Population Projection Bromsgrove District (New Table not included in the January 2018 Chapter 16 Socio-economic)



ONS 2018 -based Population Projection Bromsgrove District					
Age range	2018	2022	2029	2039	% Increase (2018-2039)
0-19	21,758	22,889	24,136	24,600	13.1
20-64	54,736	56,161	57,835	60,465	10.5
65-90+	22,168	23,343	26,014	29,697	34.0
All ages	98,662	102,393	107,985	114,463	16.02

3.19 **Table 16.3** Tenure of Households at 2011 – remains valid (latest information available). **Table 16.4** Accommodation Type – remains valid (latest information available)

3.20 The housing requirement over the plan period remains the same as described in the January 2018 Chapter 16 Socio-economic. In December 2019 the District demonstrated a shortfall of housing delivery of 603 units, giving a housing land supply of 3.45 years (Source AMR December 2019).

3.21 There have been 565 affordable houses completed since 2011/2012 (Source AMR December 2019). Table 16.1.2 below shows the affordable housing delivery over the last 8 years

**Table 16.1.2** Affordable Housing Delivery (new table)

	11/12	12/13	13/14	14/15		15/16	16/17	17/18	18/19	Total
<b>Affordable Housing Completions</b>	157	50	30	12		166	36	78	36	565

*Open Space*

3.21 **Table 16.5** – Provision of Open Space across Bromsgrove District – remains valid (latest information available). **Table 16.6** – Recommended Local Standards of Provision of Open Space within Bromsgrove - remains valid (latest information available).

Education

3.22 **Table 16.7** – Education Provision locally has been updated to reflect changes to capacity and numbers of children on the school roll, referenced from the most up to date information from January 2018 when the social and economic chapter was last updated.

**Table 16.7** – Education Provision

No	Level	School Name	NOR	Capacity	Surplus / Deficit
1	Primary	Bromsgrove Preparatory (Private)	-	-	-
2		Charford First School	<del>434</del> 424	450	<del>+16</del> +26
3		Dodford First School	<del>61</del> 71	75	<del>+14</del> +4
4		Finstall First School	<del>300</del> 301	296	<del>-4</del> -5
5		Meadows First School	<del>300</del> 302	300	0 -2
6		Millfield First School	<del>238</del> 288	<del>221</del> 300	<del>+17</del> +12
7		St. Peter's Catholic First School	<del>269</del> 275	300	<del>+31</del> +25
8		Sidemoor First School	<del>294</del> 285	300	<del>+6</del> +15
<b>Total Surplus / Deficit of Places at Primary School level @ Jan-2013 @ Jan. 2019</b>					<b><del>+46</del> +75</b>
1	Secondary	Aston Fields Middle School	<del>597</del> 585	600	<del>+3</del> +15
2		Bromsgrove School (Private)	-	-	-
3		Bigby Hall School (Special Needs)	-	-	-
4		Catshill Middle School	<del>285</del> 307	<del>360</del> 480	<del>+75</del> +173
5		Chadgrove School (Private)	-	-	-

6		North Bromsgrove High School	762 816	1,041	+279 +225
7		Parkside Middle School	490 558	480 520	-12 -38
8		South Bromsgrove Community High School	1,348 1331	1,294 1309	-54 -22
9		St. John's CofE Middle School	648 640	600	-48 -40
<b>Total Surplus / Deficit of Places at Secondary School level @ Jan. 2013 @ Jan. 2019</b>					<b>+242 +313</b>

Source: Worcestershire County Council Spring School Census 2019 and Worcestershire School Capacity Survey 2018

3.24 The commentary included in the Worcestershire School Capacity Survey 2018 stated that, after several years of growth, the birth rate in Worcestershire is expected to stabilize, and that the number of children in Primary and First schools across Worcestershire is expected to maintain between 44,000 and 45,000. It acknowledged that additional expansion will be required in response to large housing allocation.

3.25 In terms of the higher primary school numbers, and areas with a three-tier system (Primary, Middle and Senior), children are now reaching secondary school transfer age. It is anticipated that there is capacity to accommodate the first wave of higher cohort of pupils, additional capacity will be required in the longer term. Worcestershire County Council (WCC) have been working with Secondary and High schools to support higher number, with anticipated further expensing of schools in the future.

#### Health Provision

3.26 There has been no change to the primary care service for the residents of Bromsgrove which are predominantly served by The Princess of Wales Community Hospital Minor Injuries Unit (MIU), which includes a Minor Burns Unit and an Inpatient Mental Health Services unit. The nearest Accident and Emergency Unit is located at the Alexandra Hospital in Redditch, although minor injuries including broken bones can be treated at The Princess of Wales Community Hospital's MIU.

3.27 **Table 16.8** List of GP Surgeries within 7 miles of the Assessment site has been updated to include any changes to health provision capacity since January 2018 when the social and economic chapter was last updated.

**Table 16.8** List of GP Surgeries within 7 miles of the Assessment

GP Surgery	Distance from the Assessment Site	No. of GP on Registered	No. of Patients on Roll	No. of GP's required to serve patients on Roll based on NHS average of 1,800 persons per GP
New Road Surgery	1.5 miles	<del>7</del> 8	<del>12,715</del> 13070	<del>7.0</del> 7.26 (rounded to 7)
Davenal House Surgery	1.6 miles	9	<del>8,810</del> -8858	4.9 (rounded to 5)
St. Johns Surgery	1.7 miles	<del>7</del> 8	<del>12,374</del> 14479	<del>6.9</del> 8.04 (rounded to 8)
Churchfield Surgery	1.7 miles	8	<del>13,511</del> 12876	<del>6.9</del> 7.15 (rounded to 7)
Stoke Prior Surgery	2.7 miles	<del>9</del> 10	<del>8,810</del> 8858	<del>7.5</del> 4.92 (rounded to 5)
Catsfield Village Surgery	3.0 miles	4	5,098	2.8 (rounded to 3)
Wychbold Surgery	4.0 miles	12	<del>12,374</del> 14479	<del>6.8</del> 8.04 (rounded to 8)
The Surgery, Hemming way	4.7 miles	4	<del>3,341</del> 3540	1.9 (rounded to 2)
Barnt Green Surgery	5.9 miles	5	<del>6,678</del> 6800	3.7 (rounded to 4)
The Glebeland Surgery	6.0 miles	2	<del>4,439</del> 4914	2.73 (rounded to 3)
The Corbett Medical Practice	6.3 miles	10	<del>12,258</del> 13176	<del>6.8</del> 7.32 (rounded to 7)
Salters Medical Practice	6.4 miles	8	<del>9,476</del> 8901	<del>5.26</del> 4.94 (rounded to 5)
The Spa Medical Practice	6.4 miles	8	<del>8,937</del> 9914	<del>5.0</del> 5.50 (rounded to 5)

3.28 **Table 16.9** List of Dental Surgeries within 7 miles of the Assessment Site below has been updated to include any changes to the provision of dental services capacity since January 2018 when the social and economic chapter was last updated.

**Table 16.9** List of Dental Surgeries within 7 miles of the Assessment Site

Dental Surgery	Distance from the Assessment Site	Accepting New NHS Patients	Accepting New Private Patients

Quality Orthodontics	1.2 miles	No	Yes
Mr G D Stokes & J C Williams & Associates	1.4 miles	No	No
College Road Dental Practice	1.5 miles	No	No
Parkside Dental Practice	1.7 miles	Yes	No
LHDP Lansdown DP	1.7 miles	Yes	No
New Road Dental Practice	1.8 miles	<del>Yes</del> No	Yes
Damani Dental Surgery	1.9 miles	<del>Yes</del> No	<del>Yes</del> No
Catshill Dental Surgery	2.9 miles	<del>Yes</del> No	Yes
Fairfield Dental Surgery	2.9 miles	<del>No</del> Yes	No
Barnt Green Dental	2.9miles	Yes	No
Mr A M Williams & Associates	5.7 miles	Yes	Yes
Eachway Dental Practice	5.8 miles	<del>Yes</del> No	Yes
Mr E M Rowley	6.0 miles	Yes	Yes
Greenwood Dental Practice	6.3 miles	No	No
Mr C Leung	6.4 miles	Yes	Yes
Mr Moodley Webheath Dental	6.4 miles	Yes	Yes

## IMPACTS

### Construction

- 3.29 The assessment in the January 2018 Chapter 16 Socio-Economic Chapter identified the economic benefits of the development as a likely significant impact of the Proposed Development. No further likely significant effects of the Proposed Development during the construction phase has been identified in this review.
- 3.30 The latest figures (NOMIS 2018) showed that there were 3,000 people employed in the construction section. This is slightly less than the 3,273 (2011 Census figure) used in the assessment undertaken in the January 2018 ES Chapter. The economic benefits of the development proposal derived from the Government's New Homes Bonus would be in the order of £5 million paid over 6 years.

3.31 The January 2018 Chapter 16 Socio-economic identified a **short to medium term, temporary, negligible** effect on population, housing, healthcare, open space and education during the construction phases of the Proposed Development. The assessed effect remains valid.

#### Post Construction

3.32 The assessment in the January 2018 ES Chapter 16 Socio-economic identified the following impacts, post construction; impact on the demographic of the local area; impact of the proposed retail element of the Proposed Development; impact on the provision of education and health services.

3.33 The January 2018 Chapter 16 Socio-economic identified that the Proposed Development would increase the population of Whitford and Bromsgrove by 1,215 people and that: *'Whilst a large proportion of the people that will choose to live at the Assessment Site will be new to the town a significant number will choose to move from other parts of the town including a considerable number of people from newly formed households from the existing population'*.

3.34 The January 2018 Chapter 16 Socio-economic concluded that residents attracted to live within the Assessment Site will have a **major beneficial effect** on the demographic profile of the local area. This review has not identified any material changes to the baseline that would contradict this conclusion. The assessed effect remains.

3.35 The January 2018 Chapter 16 Socio-economic concluded *'It is considered that unless changes in current trends occur, the proposed development will have a long term, permanent, negligible effect on the provision of education locally'*. This review has not identified any material changes to the baseline that would contradict this conclusion. The assessed effect remains valid.

3.36 The January 2018 Chapter 16 Socio-economic identified at **Table 16.11** – Retail Employment Density, the potential jobs created by the local centre and concluded

that this will have a **minor beneficial effect** on the provision of employment opportunities and the demographic profile of the area. This review has not identified any material changes to the baseline that would contradict this conclusion. The assessed effect remains valid.

- 3.37 The January 2018 Chapter 16 Socio-economic concluded that there is sufficient GP and dental service capacity within existing services to absorb the development proposal and concluded that, the Proposed Development will have a **negligible effect on** existing local GP and dental surgery services. This review has not identified any material changes to the baseline that would contradict this conclusion. The assessed effect remains valid.

#### **MITIGATION AND MONITORING**

- 3.38 Construction – the 2018 Socio-Economic Chapter concluded that no mitigation is required. This assessment remains valid.
- 3.39 Post Construction: the 2018 Socio-Economic Chapter concluded that no mitigation is required. This assessment remains valid.

#### **RESIDUAL IMPACTS**

- 3.40 Construction – the 2018 Socio Economic Chapter concluded that residual effects are considered to be **negligible to minor beneficial**. This assessment remains valid.
- 3.41 Post Construction - The 2018 Socio-Economic Chapter concluded that residual effects are considered to be **negligible to minor beneficial**. The January 2018 Chapter further stated that should any trend changes indicate an adverse impact on education provision, mitigation by appropriate financial contributions, secured through an Agreement entered into under Section 106 of the Town and Country Planning Act 1990, will lead to a **negligible** residual impact. This assessment remains valid.

#### **Development Programme**

3.42 In March 2020, the appellants agreed with the suggestion advanced by Bromsgrove Council for an amended trajectory as shown below. This assumed that outline planning permission would be obtained in autumn 2020 following the conclusion of the appeal process in July 2020 in line with the then bespoke programme, with 490 coming from the main site and a further 15 from Site B.

- 20/21 – 0
- 21/22 – 50
- 22/23 – 120
- 23/24 – 120
- 24/25 – 120
- 25/26 - 95

3.43 On the basis that the appeal site and the Perryfields allocation are both currently unconsented it is considered that the amended trajectory will not affect or have implications for the future baseline scenarios and the assessment of cumulative effects.

3.44 All of the information introduced here to update the Whitford Road application (16/1132) has been prepared in consultation with the relevant statutory consultees, and each has been provided with this additional information as it was completed. We are not aware that any statutory consultee has lodged, or intends to lodge, an objection to the Whitford Road application on any matter addressed by the information covered here or by any other part of the Environmental Statement or information submitted in support of the development proposals.



3.45 We believe that each statutory consultee is content that the Environmental Impact Assessment (EIA) of the Whitford Road proposals is robust and that its overall findings are sound.

## 4.0 NON-TECHNICAL SUMMARY AND CONCLUSIONS

4.1 In response to a request from PINS on 22<sup>nd</sup> April 2020, the appellants have undertaken a review of the ES to address the following matters. The responses are presented in a tabular format using non-technical terminology.

- An updated Landscape and Visual Impact Assessment to take into account changes which may have occurred in the receiving environment since the original assessment (including the assessment of cumulative effects with other development);
- A description of the extent to which application of the updated climate change allowances published in the Planning Practice Guidance are likely to affect the findings in the Flood Risk Assessment;
- Updated baseline noise surveys (or justification to explain why the original data remains valid). It is noted that the noise assessment has been updated but this is based upon data collected during 2017;
- An update of the socio-economic assessment taking into account changes to the local demographics, and capacity of local services and infrastructure (or justification to explain why the original data remains valid)
- The ES states that the Proposed Development would commence in 2017 and be completed by 2023. This should be revisited and updated to take into account the implications this may have for the future baseline scenarios and the assessment of cumulative effects, (or justification should be provided to explain that the anticipated future baseline would remain unaffected); and
- A revised non-technical summary (NTS) incorporating all of the elements referred to above.

Additional Work Undertaken	Implication to ES
<p><b><u>Landscape and Visual Impact</u></b></p> <p>The ES Landscape and Visual Assessment Chapter 14 has been reviewed to determine whether the conclusions reached are still applicable.</p> <p>It is necessary to provide new text and Tables as a consequence of this work.</p> <p>However, the overall conclusions remain unchanged.</p>	<p>A technical Note has been produced providing an updated Photo Record contained within Appendix 14.2 of the ES.</p> <p>The Technical Note also updates any superseded or out of date published planning policy or documentation in Chapter 14 (Landscape and Visual Assessment) of the ES.</p>
<p><b><u>Noise</u></b></p> <p>The ES Noise Chapter 15 has been reviewed to determine whether the conclusions reached are still.</p> <p>It is necessary to provide new text and Tables as a consequence of this work.</p> <p>However, the overall conclusions remain unchanged.</p>	<p>Addendum to Chapter 15 (Noise) of Volume 1 of the ES in the form of an updated Chapter.</p> <p>New appendices to the ES Chapter 15 as contained within Volume 2 of the ES.</p> <p>The new appendices are:</p> <p>Appendix 15.1 – Day Time Noise Contour Map</p> <p>Appendix 15.2 – Night Time Noise Contour Map</p>

<p><b><u>Hydrology and Drainage</u></b></p> <p>The ES Chapter 13 (Hydrology and Drainage) has been reviewed to describe the extent to which application of the updated climate change allowances in NPPG are likely to affect the findings in the Flood Risk assessment.</p> <p>It is necessary to provide a new Appendix 13.2 as a consequence of this work.</p> <p>However, the overall conclusions of the ES remain unchanged.</p>	<p>New Chapter 13 (Hydrology and Drainage) Volume 2 Appendix 13.2 of the ES in the form of an updated Appendix.</p>
<p><b><u>Socio-Economics</u></b></p> <p>The ES Socio economic Chapter 16 has been reviewed to determine whether the conclusions reached are still applicable.</p> <p>It is necessary to provide new text and Tables as a consequence of this work.</p> <p>However, the overall conclusions remain unchanged</p>	<p>Addendum to Chapter 16 (Socio economics) of Volume 1 of the ES in the form of an updated Chapter identifying changes and new data.</p>
<p><b><u>Development Programme</u></b></p> <p>In March 2020, the appellants agreed with the suggestion advanced by Bromsgrove Council for an amended trajectory as shown below. This assumed that outline planning permission would be obtained in</p>	<p>None</p>

<p>autumn 2020 following the conclusion of the appeal process in July 2020 in line with the then bespoke programme, with 490 coming from the main site and a further 15 from Site B.</p> <p>On the basis that the appeal site and the Perryfields allocation are both currently un-consented it is considered that the amended trajectory will not affect or have implications for the future baseline scenarios and the assessment of cumulative effects.</p>	
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4.2 No new or different likely significant environmental effects have been identified through the submission of this information and the conclusions of the ES remain unchanged.

4.3 The ‘further information’ and points of clarification that have been addressed in this submission demonstrate that the proposal is deliverable and do not give rise to significant issues in relation to the determination of the planning application. It is therefore concluded that the proposal will not give rise to any unacceptable environmental effects and that the potential benefits of the scheme are such that they clearly outweigh any negative harm that might result from the proposed development. Planning permission for this allocated site should accordingly be granted without delay.