

Part B (see Note 1 and Note 8 para 4.2)**Please use a separate Part B form for each representation you wish to make**

Name or Organisation (see Note 8 para 4.1)

PJ Planning

1. To which part of the BDP does this representation relate?

Page: 23-25	Paragraph:	Policy: BDP4
Policies Map:	Other document:	

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

4. Please set out what change(s) you consider necessary to make the BDP legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BDP legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

5. Do you consider the BDP is sound? (see Note 3)

Yes: No: Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	<input checked="" type="checkbox"/>
(2) Effective (see Note 5)	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input checked="" type="checkbox"/>
(4) Positively prepared (see Note 7)	<input type="checkbox"/>

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Please see supporting representation statement

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

Please see supporting representation statement

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? **Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

Please see supporting representation statement

Signature

Date: 8th November 2013

Bromsgrove District Council
District Plan Proposed Submission Document

Representations On Behalf of Bournville Village Trust

November 2013



**5 St Paul's Terrace
82 Northwood Street
Birmingham B3 1TH**



DATE ISSUED

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REPORT REFERENCE

BROMSGROVE DISTRICT PLAN SUBMISSION - REPS

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1. The Representation

- 1.1 PJ Planning, a West Midlands based planning consultancy have been instructed by Bournville Village Trust (BVT), to submit representations to Bromsgrove District Council's (the 'local planning authority') Bromsgrove District Plan 2011-2030 Proposed Submission Version (the District Plan).
- 1.2 PJ Planning has reviewed the local planning authorities evidence base, against the draft plan policies and national policy, taking into account the tests for soundness an inspector must take into account when examining the District Plan. This statement, together with the attached form, will form the basis for our representation.

2. Relevant Policy From Emerging District Plan

- 2.1 Section 8 of the Bromsgrove District Plan contains policies for the district. Paragraph 8.1 lists the key policies that "identifies the growth needs for the district". These advocate a green belt review of the plan and sets the criteria by which this review will be achieved.
- 2.2 Policy BDP3 sets out future housing and employment growth for Bromsgrove District and, states that 7,000 dwellings would be provided within the plan period, of which 2,400 would be delivered through a Green Belt Review. The table in this policy states that 4,600 dwellings would be delivered outside the green belt between 2011 and 2023, by which time the Green Belt Review would have been completed, and the additional 2,400 dwellings be delivered on land allocated through this between 2023 and 2030.
- 2.3 Policy BDP4 sets out the role of Green Belt within Bromsgrove District. Paragraph 8.28 states that the urgent need for an up to date District Plan is a key factor in "progressing a plan that identifies sufficient land to deliver 4,600 of the 7,000 requirement by approximately 2023



without altering Green Belt boundaries”, and “acknowledges the remaining 2,400 homes cannot be delivered without altering Green Belt boundaries”.

2.4 The paragraph states that a Green Belt review would be carried out “in advance” of 2023, which will provide the land necessary to deliver the remaining 2,400 homes in the latter part of the plan period, as well as addressing the longer term development needs of the area. The four key points of the Green Belt review are also outlined.

2.5 Point 2 of Policy BDP4 (Green Belt) states:

A Local Plan Review including a full Review of the Green Belt will be undertaken in advance of 2023 to identify:

- a) Sufficient land in sustainable locations to deliver approximately 2,400 homes in the period 2023-2030 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 and adjacent authorities based on the latest evidence; and*
- c) Land to help deliver the objectively assessed housing requirements of the West Midlands conurbation within the current plan period i.e. up to 2030.*

2.6 Policy BDP5 discusses Bromsgrove’s Strategic Site Allocations. Paragraph 8.40 states that there is a need to secure sites for 5,562 dwellings to come forward by 2030, and that it is deemed necessary to “allocate sites without delay”. Paragraph 8.41 states that there are two separate groups to allocations, including the three Bromsgrove Town Expansion sites in one group, and other development sites in the other, which are primarily smaller sites within the wider Bromsgrove District.



3. Is Policy BDP4 in conformity with the NPPF?

3.1 Paragraph 14 of the NPPF states that, in terms of plan making and decision making, local planning authorities should apply a *'presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.'*

3.2 It goes on to state that, in terms of plan making, this means that:

Local plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change....

There is, thus an onus on the local planning authority to show, in this case, that the local authority can meet long and short term objectively assessed needs, and adapt to possible rapid change, by carrying out the Green Belt Review mid way through the plan period.

3.3 Paragraph 47 of the NPPF states that local authorities should identify and update a supply of specific deliverable sites to maintain a five year housing supply. It then states that local authorities should:

identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;

3.4 Footnote 12 to Paragraph 47 of the NPPF states that for sites to be considered deliverable, they:

should be in a suitable location for housing development, and there should be a reasonable prospect that the site is available, and could be viably developed at the point envisaged.

3.5 This means that the local authority should already be considering sites for the period 2023-2030, and identifying specific, deliverable sites for part of this period. Land inside the Green Belt, by its designation is not considered suitable for housing, and therefore, no land inside the



Green Belt should be considered as “deliverable” until a Green Belt review is carried out. Whilst the local authority have identified “Green Belt Potential” sites in it’s SHLAA, none of these can be deemed to be deliverable at this time.

- 3.6** By simply stating that development for the second half of the plan period will be directed by the results of the “Green Belt Review”, no specific, deliverable sites can be identified, nor can there be any certainty in identifying potential broad locations of growth. For these reasons, the current proposed housing levels and timetable of delivery is contrary to paragraph 47 of the NPPF.
- 4 . Is It Reasonable To Expect Housing Targets Would Be Met With A Green Belt Review Late In The Plan Period?**
- 4.1** The plan period for the District Plan is split into two stages, namely 2011-2023, and 2023-2030. The local authority submit that sufficient housing can be provided in the first part of the plan period by making use of the development in the three Town Expansion sites, as well as allocations in villages in the district.
- 4.2** Paragraph 8.41 states that the three Bromsgrove Town Expansion sites will all need to come forward to maximise delivery before the Green Belt Review is carried out. However, a number of issues have been identified concerning the Town Expansion sites by consultees, and although the local authority believes that these can be addressed by policy BDP5, there is a possibility that schemes within these areas may be delayed due to issues encountered when planning applications are submitted. There is also the risk that the level of development on these sites be less than expected in the early part of the plan period.
- 4.3** Paragraph 8.13 states that until the Green Belt review has been carried out “it is considered desirable” that village boundary envelopes would



remain unchanged. Approximately 90% of Bromsgrove is in Green Belt, with settlement boundaries almost always adjoining Green Belt Land, and therefore, only infill developments can take place within villages until the Green Belt review has been conducted.

- 4.4 In light of these two points, by not conducting a Green Belt Review in conjunction with the District Plan, in the event of slow uptake on allocated sites, there is essentially no opportunity for other potentially sustainable sites else to come forward earlier on in the plan period. This method of plan making has the potential to dramatically affect the local authorities continued five year housing supply.
- 4.5 At present, there is no certainty about the number of dwellings that could indeed be provided by a Green Belt review, yet a figure of 2,400 dwellings is listed within the District Plan as being achievable. Whilst it can be argued that potential Green Belt sites are not suitable for development now, in the event that development can not be provided in the locations proposed in phase I of the plan, the local authority would be obliged to support applications in sustainable locations elsewhere to meet their housing requirements.
- 4.6 Therefore, there are reasonable grounds to doubt the overall deliverability of housing during the plan period, and the ability to maintain a continuous supply of deliverable housing before a Green Belt review has been conducted.

5. Other Considerations

- 5.1 As well as housing for the second phase of the plan period, the emerging plan also states that fallback employment land, as well as Gypsy / Traveller land would be provided through the Green Belt review.
- 5.2 In much the same way that allocated housing sites may be met with issues, or low uptake, the same principle applies here, which would



limit the potential for ensuring targets are met in this area. This would impact on the ability to meet the overall strategic objectives of the District Plan.

6. Changes necessary to make Policy BDP4 Sound

- 6.1 In order to make Policy BDP4 sound, a Green Belt review should be completed as part of the evidence base to support the plan making process, and related housing policies updated in light of this. Policy BDP4 should then reflect remaining Green Belt land.
- 6.2 This will ensure that the District Plan meets the full, objectively assessed needs for both market and affordable housing within Bromsgrove District, bringing the policy into line with paragraph 47 of the NPPF, and meeting the tests for soundness.

Wil Vincent
November 2013