

**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)

Homes and Communities Agency

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

Page:	Paragraph:	Policy:
Policies Map:	Other document: Infrastructure Delivery Plan	

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)

n/a

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)

n/a

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

The Homes and Communities Agency (HCA) owns 44ha of land on the northern edge of Bromsgrove, known as Barnsley Hall. The site comprises the remaining undeveloped part of the former Barnsley Hall Hospital site. It is situated between two of the proposed Expansion Sites (BROMS 1 and BROMS 2) and adjacent to both the A38 and M42. The site is currently designated as Green Belt.

#### **Meeting Objectively Assessed Development and Infrastructure Needs**

The Infrastructure Delivery Plan (IDP) has largely focused on the infrastructure needs to deliver the Expansion Sites i.e. the development strategy up to 2023. In line with the wider development strategy the intention is to revise the IDP as part of the Green Belt review which is scheduled for some time before 2023.

The remaining land at Barnsley Hall has the potential to facilitate the delivery of a highway or public transport link which could contribute to a more integrated transport solution for Bromsgrove with the ability to link with the Expansion Sites and potentially help alleviate some of the trips through Bromsgrove town centre. As part of the earlier phases of the redevelopment of the hospital complex a new access road was constructed from the Stourbridge Road around 10 years ago. This was provided both to serve the new development but also as the first phase of a potential link road between Stourbridge Road (A4091) and Birmingham Road (A38).

The HCA believes that the option of creating an infrastructure link with, or through, the Barnsley Hall site should be considered as part of the delivery strategies for the Expansion Sites, as well as to support future growth, to help deliver an integrated strategy for the Plan period. The Agency would support an early review of the Green Belt and associated infrastructure delivery plan, following the adoption of the Plan.

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**)

IDP Appendix A should give more consideration to the infrastructure required to deliver the development required for the full Plan period. Particular consideration should be given to the benefits of using land at Barnsley Hall to help integrate transport infrastructure with the Expansion Sites.

**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	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

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)

The HCA is keen to use public sector land to help support the Government's objectives of delivering sustainable development and to meet the development and infrastructure needs of the District.

Signature:

Date: 11 November 2013

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Name or Organisation (see Note 8 para 4.1)

Homes and Communities Agency

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

Page:	Paragraph:	Policy: BDP3/4
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.

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Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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The Homes and Communities Agency (HCA) owns 44ha of land on the northern edge of Bromsgrove, known as Barnsley Hall. The site comprises the remaining undeveloped part of the former Barnsley Hall Hospital site. It is situated between two of the proposed Expansion Sites (BROMS 1 and BROMS 2) and adjacent to both the A38 and M42. The site is currently designated as Green Belt.

The HCA believes that this site should play an important part in meeting the future development needs of the District during the plan period and the Agency has actively engaged with the plan making process in this regard. The HCA is keen to bring this public sector land site forward for development to help support the Government's objectives of delivering sustainable development and, in particular, significantly increasing the supply and delivery of market and affordable housing.

In this context the HCA is concerned that the Proposed Submission Version of the Plan is not fully effective and believes it could be prepared more positively to make the most of the opportunities at the Barnsley Hall site to help meet the development and infrastructure needs of the District. The principal reasons for this are as follows.

#### Reliance on Green Belt Review by 2023

The Council is seeking to submit a Plan which has identified land to deliver only part of the housing required over the plan period (4,600 of the 7,000 requirement). The Council acknowledges that the remaining 2,400 homes will require alterations to the Green Belt boundaries identified in the Plan. Such an approach is not fully in accordance with the expectations in the NPPF (para. 83) that local planning authorities with Green Belts in their area should identify Green Belt boundaries which are capable of enduring beyond the plan period.

Accepting the premise that sufficient land has been identified for 4,600 homes and that undertaking a Green Belt review at some point prior to 2023 to identify land for the remainder is a justifiable strategy, the HCA's view is that the timetable for the Green Belt review needs to be much more specific. Indeed the HCA believes that in this context a Green Belt review should be undertaken immediately following adoption of the Plan for the following reasons:

- The development strategy up to 2023 is heavily reliant on three strategic Expansion Sites. These sites have yet to all secure planning permission and are still some way off delivering housing to meet local needs.
- Housing completion rates have been slow in Bromsgrove and remain so. The HCA accepts this is in line with national trends, but delivery rates on the three Expansion sites will need to be significantly higher than the average delivery rates for the District as a whole over the last 5 years (approximately 150 homes per annum) in order to achieve the development strategy's housing targets. These sites are unlikely to be delivering much housing prior to 2016 leaving seven years to deliver the forecasted 2,106 homes on these three sites (approximately 300 dwellings per annum), which would seem challenging.
- Without the inclusion of some Green Belt sites during this period the delivery of market and affordable housing is likely to fall well behind the predicted housing trajectory as illustrated in Appendix III of the Plan.

HCA supports the proposed approach to the Green Belt review (paras. 8.29 – 8.31). The HCA notes that the Barnsley Hall site would readily meet the criteria for suitable sites to be released from the Green Belt by being:

- Located in Bromsgrove town which is in line with the settlement hierarchy for growth in the District (BDP2 and para 8.29/30)
- Located adjacent to the M42 and the existing urban area creating the opportunity to create a

- defensible and long term boundary for the Green Belt.(para 8.30)
- Physically close to the proposed Expansion Sites with the potential to integrate uses and infrastructure (para 8.30)

As part of the earlier phases of the redevelopment of the hospital complex a new access road was constructed from the Stourbridge Road around 10 years ago. This was provided both to serve the new development but also as the first phase of a potential link road between Stourbridge Road (A4091) and Birmingham Road (A38). The remaining land at Barnsley Hall has the potential to facilitate the delivery of a highway or public transport link which could contribute to a more integrated transport solution for Bromsgrove with the ability to link with the Expansion Sites and help alleviate some of the trips through Bromsgrove town centre. This adds further weight to the importance of an early Green Belt review and ensuring the option of creating an infrastructure link is considered as part of the delivery strategies for the Expansion Sites.

#### **Meeting Objectively Assessed Development and Infrastructure Needs**

The HCA notes the recent decision by the Inspector examining the South Worcestershire Development Plan. The Inspector has concluded that the population and housing projections should be higher because:

*"...the modelling and analysis in the February 2012 SHMA do not provide a reliable basis for identifying the level of housing need in South Worcestershire over the Plan period".*

The Inspector has asked the Councils to undertake further modelling and analysis in order to derive an objective assessment of housing need over the Plan period. The Councils were also advised that once the housing requirement has been established, the Councils will need to consider alternative or additional site allocations to those in the submitted Plan.

The Bromsgrove District Plan draws on the same SHMA as evidence underpinning the development strategy. The shortcomings identified by the Inspector in the South Worcestershire Development Plan examination are likely to apply to Bromsgrove (and Redditch) too. This would suggest that further sites are likely to be required to meet development and infrastructure needs in the District than are currently being planned for.

The outcome of the South Worcestershire Examination should be considered alongside the expected requirement to meet some of the housing needs from the Birmingham conurbation in the northern parts of the District which is acknowledged in the Plan (para 8.31). Both these factors add further weight to the need for an early review of the Green Belt.

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BDP4 should be amended to provide a more specific timetable for the Green Belt review. Reference should be made to commencing the Green Belt review immediately following the adoption of the Plan.

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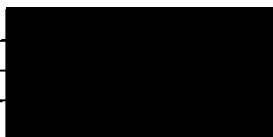
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Signature:



Date: 11 November 2013