

The Strategic Planning Team
Planning and Regeneration
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19481/A3/RC/ac

11th November 2013

Dear Sir or Madam,

**REPRESENTATIONS TO THE PROPOSED SUBMISSION BROMSGROVE DISTRICT PLAN
CONSULTATION (NOVEMBER 2013)**

Barton Willmore is instructed by Taylor Wimpey UK Ltd to submit representations to Bromsgrove District Council in response to the Proposed Submission consultation (November 2013). Taylor Wimpey UK Ltd have land interests at Alvechurch and an appropriate SHLAA submission has also been submitted to allow the consideration of this Site in the planning policy process.

Taylor Wimpey UK Ltd are committed to the development of sustainable sites in Bromsgrove to ensure that the Council can meet their full objectively assessed housing needs over the Plan period.

We respond to individual policies contained within the document below:

BDP 2: Settlement Hierarchy

We fully support the acknowledgement that Alvechurch forms one of the most sustainable locations for growth as one of six large settlements for which proportionate residential development is appropriate. In order to provide clarity to both developers and members of the public and to form an effective strategy it is considered that Policy BDP 2 should include the hierarchy as set out in Table 2 of the supporting text. Furthermore, the Policy should seek to apportion growth in a proportionate and sustainable manner across at least the large settlements as identified in the settlement hierarchy.

BDP 3: Future Housing and Employment development

It is apparent from both the policy and supporting text that Bromsgrove cannot meet the objectively assessed housing need over the Plan period without reviewing the Green Belt boundaries. Given this position, it is not considered that a sound District Plan can be progressed without carrying out a Green Belt review to find at least an additional 2,400 dwellings. The Council is essentially seeking to progress a District Plan which only meets ten years worth of the objectively assessed housing



needs which is not compliant with guidance in the NPPF, which states in paragraph 157 that *'crucially Local Plans should... be drawn up over an appropriate time scale, preferably a 15-year time Horizon'*. *It is not considered that the Plan would be legally compliant in its current guise.*

In addition, as is acknowledged in paragraph 8.25, *'Birmingham City Council may require assistance in achieving their housing target'*. This position has continued to evolve and it is now clear that Birmingham will be reliant on neighbouring authorities to assist in meeting their housing need.

By carrying out a Green Belt review at this time the Council will be in a position to respond in a flexible manner as the precise level of assistance to be provided to Birmingham City Council becomes clear. In the context of the Duty to Cooperate (NPPF, Para. 178) the Council should be working collaboratively with other bodies to ensure that strategic priorities across local boundaries can be met. The Council can be in a much more prepared position to respond to the emerging needs of Birmingham by assessing the sustainability and deliverability of all land across the District, including the Green Belt.

BDP 4: Green Belt

3 As per our response to BDP 3, given the District's own housing need and the known emerging need from Birmingham it is necessary to carry out a full review of the Green Belt in advance of adopting the Bromsgrove District Plan.

BDP 7: Housing Mix and Density

4 We welcome that a large mix of dwelling types will be required on 'large sites', although it is considered appropriate to define the level that the Council are referring to in terms of 'large sites'.

BDP 8: Affordable Housing

5 We welcome the acknowledgement that the level of provision on sites will be negotiable on a site-by-site basis. However, the use of the word 'may' in paragraph BDP 8.2 is not consistent with the NPPF. Paragraph 173 of the NPPF states that development should *'not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened'*.

Therefore, where the applicant can fully demonstrate that the required target cannot be achieved the Council must renegotiate the requirement in the context of this and other S106 requirements.

BDP 8.5 states that 'all homes should be built to Lifetime Homes Standards'. Given that this is contained within the affordable housing policy it is assumed that this relates only to the affordable housing provision, however, this should be made clear in the policy. In addition, it should be considered further whether it is appropriate that all affordable housing is built to this standard due to the impact on internal design not being appropriate for all end users and a requirement at any one time for only a proportion of housing to be suitable for elderly residents.

We trust that the above representations will assist you in progressing the District Plan and would be grateful if you could give consideration to our comments and continue to advise us of progress on the Local Plan. In the meantime if you have any queries, please do not hesitate to contact either Kathryn Ventham or myself.

Yours sincerely,

