Planning and Regeneration
Strategic Planning

Bromsgrove District Council
www.bromsgrove.gov.uk

Bromsgrove
District Plan

Regulation Section 22 (1)(c)(v) Report

Summary of Issues Raised to the Proposed Submission Version of the Bromsgrove District Plan

February 2014

Regulation Section 22 (1) (c) (v) Report

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Contents

Appendices

1. Introduction

1.1 Bromsgrove District Council will submit the Bromsgrove District Plan (BDP) to the Secretary of State on 28 February 2014.

1.2 The BDP has been prepared in accordance with adopted Statement of Community Involvement and the Town and Country Planning (Local Development) (England) Regulations 2012 (SI 767/2012) and the 2004 Act (as amended). Stages prior to the commencement of the 2012 Regulations were prepared in accordance with legislation pertaining at that time.

1.3 This statement has been prepared in accordance with Regulation 22 (1) (c) (v) of the Town and Country Planning (Local Development) (England) Regulations 2012. This Statement sets out details of the publication of the BDP. This includes how the publication was undertaken, how many representations were received and the main issues that were raised.

1.4 Regulation 22 (1) (c) also requires a statement setting out the representations made at the Regulation 19 stage. This requirement is met by the Consultation Statement (September 2013) which was published alongside the Proposed Submission Version of the BDP on September 30th.

2. Publication under Regulation 19 of the 2012 Regulations

2.1 The Proposed Submission version of the BDP was approved at a Full Council meeting on 25th September 2012 for publication. There was a 6 six week representation period held between 30th September and 15th November 2013.

2.2 Notification of the publication was sent by post to over 2,800 bodies and individuals on the Council database including all the extant specific and general consultation bodies listed in Appendix A of the Consultation Statement (September 2013). This set out how copies of the relevant documentation, submission forms and explanatory notes could be accessed and how to submit representations. The letter also stated the deadline for the submission of representations. A copy of the text in the letter to the consultees is provided at Appendix 1.

2.3 A notice was placed in the Bromsgrove and Redditch Standard on 4th October 2013 setting out the Statement of Representations Procedure (Appendix 2). The contents of the notice were also placed on the council's website. The notice also highlighted that Planning Officers were available to provide guidance on how to complete Representation Forms at The Council House and/or Customer Service Centre during the following dates/times:

- Monday to Friday (30th Sept -11th Nov): 9am to 5pm (Main Reception)
- Tuesday (1st Oct, Conference Room): 4pm to 8pm and
- Thursday (17th Oct and 31st Oct, Committee Room): 4pm to 8pm
- Saturday (5th Oct, 19th Oct, and 2nd Nov): 9.00am to 11.30am (Customer Service Centre/Dolphin Centre)

2.4 Officers were also available at Redditch Town Hall during the following dates/times:

- Monday to Friday (30th Sept -11th Nov): 10am to 4pm (Main Reception)
- Tuesday (8th Oct, 22nd Oct, and 5th Nov): 4pm to 8pm (Committee Rooms)
- Saturday (12th Oct, 17th Oct and 31st Oct): 9.00am to 11.30am (Committee Rooms)

2.5 Copies of the Proposed Submission Document, and other supporting material were placed on deposit at the Council House, Customer Service Centre and the following local libraries:

- Alvechurch
- Bromsgrove
- Catshill

- Hagley
- Rubery; and
- Wythall

2.6 Representation forms and guidance notes for their completion were also made available in the locations listed above. All of the relevant documents were published on the Council website.

3. The Representations

3.1 The Number of Representations Received

3.2 145 bodies or individuals made representations (Appendix 3). Of the 145 representors, 685 separate representations (or individual comments) were made. Some representors did not use the representation forms and some of these representors tended not to indicate whether they considered the Proposed Submission Document to be legally compliant, sound, or if they wished to attend the Examination Hearings.

3.3 The Nature of the representations

3.4 The 145 Representors

3.5 Although it is difficult to categorise the responses, the following breakdown gives a general indication of the profile of those submitting representations.

- 51 representors were individuals
- 6 representors were community groups.
- 49 representors were developers, landowners and businesses.
- 18 representors were statutory agencies.
- 9 representors were Parish Councils.
- 11 representors were interest groups/organisations.

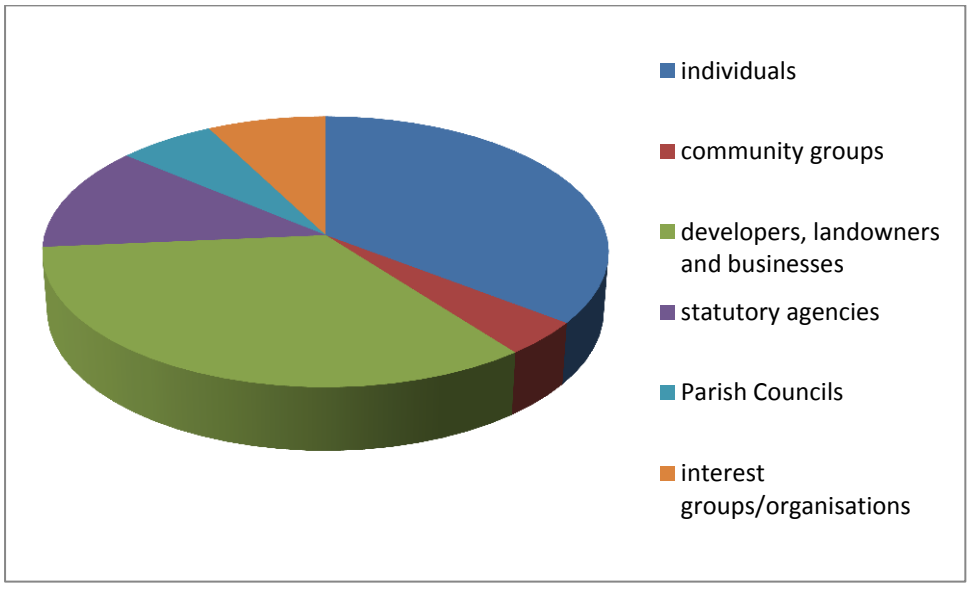

Chart 1: Profile of representors

3.6 58 (40%) representors indicated they wish to participate at the hearing sessions of the Examination.

3.7 Legal Compliance

3.8 Of the 686 individual representations:

- 209 representations stated that they found the Plan to be legally compliant.
- 160 representations stated that they did not find the Plan to be legally compliant.
- 317 did not state whether they considered the Plan legally compliant or not.

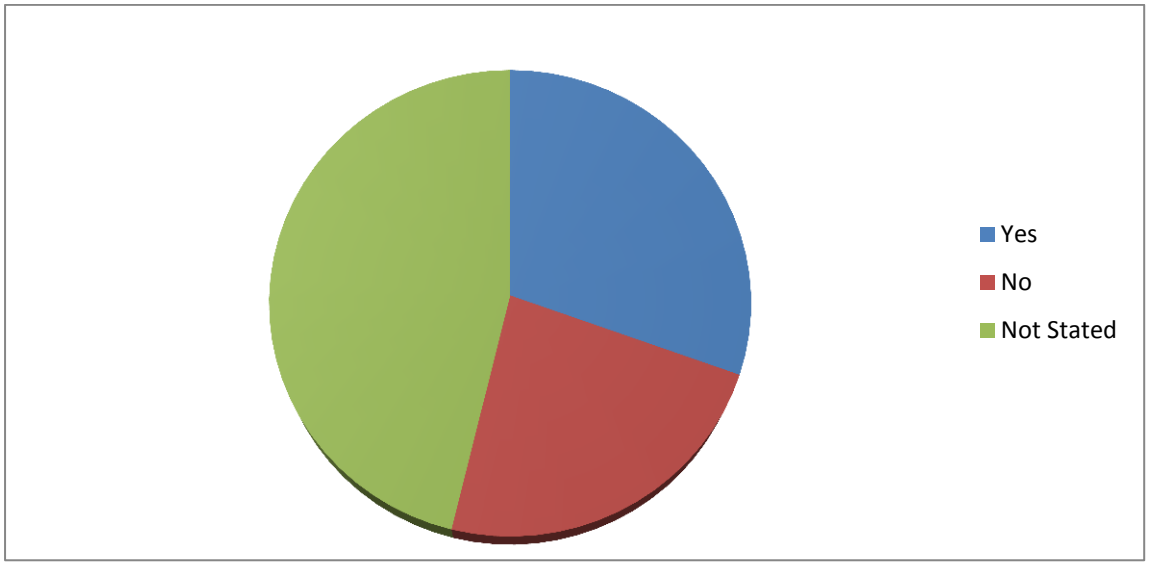

Chart 2: Is the Plan Legally Compliant?

3.9 Test of Soundness

3.10 Of the 686 individual representations:

- 92 representations stated that they considered the Plan sound.
- 451 representations stated that they considered the Plan unsound.
- 143 representations did not state whether they considered the Plan sound or not.

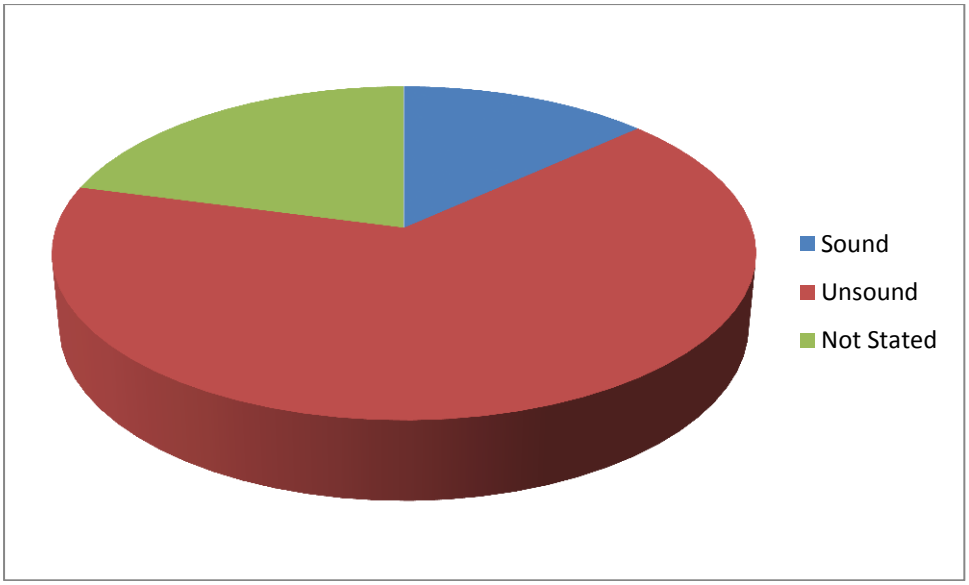

Chart 3: Is the plan sound?

3.11 Break down of the Test of Soundness

3.12 Of the 686 individual representations that considered the Plan unsound:

- 347 found the Plan content to be **not** Justified.
- 305 found the Plan content to be **not** Effective.
- 255 found the Plan content to be **not** Consistent with national policy.
- 253 found the Plan content to be **not** Positively prepared.

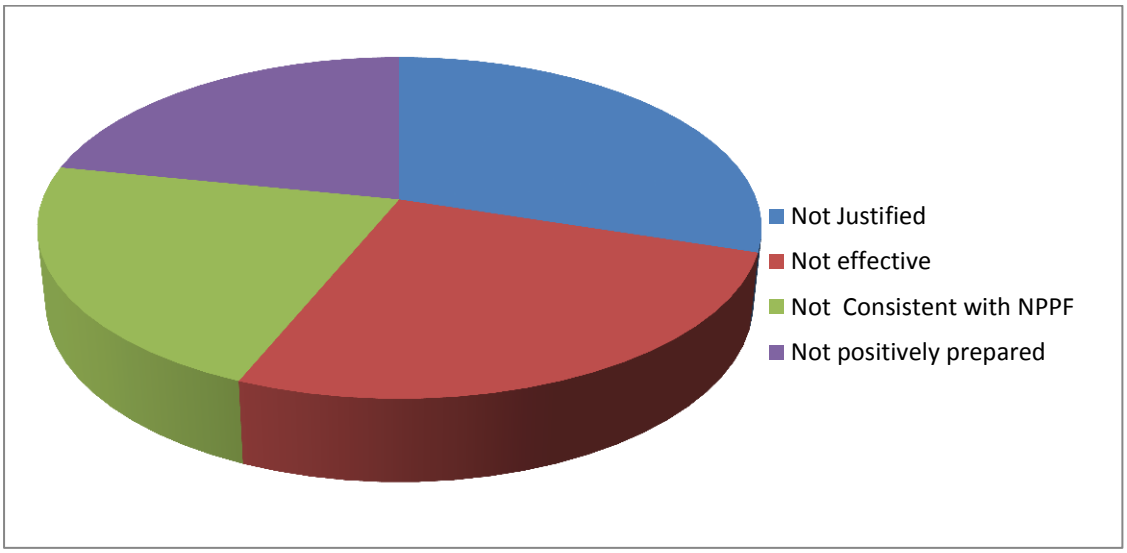

Chart 4: Why is the Plan unsound?

3.13 The Main Issues Raised in the Representations

3.14 The summaries below indicate the main issues raised in the representations. These do not attempt to cover all the issues raised, or the detailed comments made. Copies of representations are available to view in full separately, or via the following link: www.bromsgrove.gov.uk/bdp

Key Challenges

- There is no need for new employment in large settlements as unemployment is low
- Key challenge 3 doesn't reference the challenge of unmet housing needs
- Support for key challenges 3 and 4 but concerns the plan will fail to deliver them
- Stemming outward commuting in the commuter belt is unachievable

The Vision

- General support for the contents of the vision
- Inadequate reference to the provision of development needs over the plan period
- Vision is misleading as it states that the Green Belt will remain unchanged
- The BDP is not capable of delivering the vision, in particular ensuring 'all sections of society will have been provided with access to homes, jobs and services.'
- Paragraphs 4.6 and 4.7 seek to make Bromsgrove a self-sufficient island

Strategic Objectives

- General support for the strategic objectives
- Concerns that the objectives have not been sufficiently reflected within policies
- Objectives do not reflect the need for an immediate review of housing requirements

BDP 1 Sustainable Development Principles

- Some felt the policy should be simplified to reflect the model policy whilst others felt further detail could be added to address issues of water quality, geodiveristy and agricultural land quality.
- The policy should be amended to reflect a higher need for housing.

BDP 2 Settlement Hierarchy

- Add a 4th tier to the hierarchy to include suitable existing countryside locations
- Provide evidence for the list of suitable development for each settlement type.

- Remove settlement boundaries for villages in the Green Belt

BDP 3 Future Housing and Employment Development

Scale of Housing Provision:

- Housing target is too low
- Further housing is needed to address affordability issues
- The Worcestershire SHMA has a number of shortcomings and further work should be undertaken now
- A full Green Belt Review should be undertaken now to identify sites for the whole plan period.
- The Plan should address the housing shortfall in Birmingham. Under the Duty to co-operate the District Council should work with Birmingham City Council to identify the scale of growth that could be provided in Bromsgrove District and identify appropriate sites.
- The approach to addressing unmet needs in Redditch is supported.

Supply:

- A 20% buffer should be applied rather than 5% to cater for past under-delivery
- 10% discount should be applied to allow for non-implemented planning permissions
- The approach to windfalls is not fully justified and unsound

Employment:

- Target is too low to deliver economic growth and meet LEP objectives
- The continued allocation of an undeliverable site is not supported
- Target could be reduced to 25ha

BDP 4 Green Belt

- A full Green Belt Review should be undertaken now to identify sites for the whole plan period.
- Greater growth should be supported in small settlements
- Ad-hoc changes to the Green Belt prior to a full review is not supported
- Policy should support the redevelopment of sustainable brownfield sites in the Green Belt
- New ADR sites should be identified
- There should be a greater emphasis on maintaining the openness of the Green Belt.
- Further details should be provided about the Green Belt Review including targets for individual settlements
- There should be reference to an immediate Local Plan Review and not just Green Belt Review

BDP 5A) Bromsgrove Town Expansion Sites

- The loss of high quality agricultural land is not justified
- Flexible approach to affordable housing provision is required
- Points m) and n) are unnecessary and should be deleted
- The term ‘high proportion’ needs clarification
- References to source protection zones and the status of ground water body needs to be included
- Development to the west of the town takes no account of proposed railway improvements
- Allocate further strategic sites to the east of the town
- Identify maximum floor space requirements for new retail development
- Reference to emergency services infrastructure is required

BDP 5B) Other Development Sites

- Insufficient sites to meet need meaning additional sites should be identified
- Clarification needed that part of Hagley site falls within Clent parish
- Ravensbank should be expanded to further meet employment needs of Redditch
- Ravensbank is within close proximity of listed buildings
- Hagley site is in close proximity to historic assets

Omission Sites:

- Barnsley Hall Site, Bromsgrove
- Land east of Swan Street/Redditch Road, Alvechurch
- Norton Farm, Bromsgrove (an additional 1.63ha)
- Kingswood Grange, Druids Heath
- The Elms, Worcester Road, Rock Hill
- Shaw Lane, Stoke Prior
- Land at Maypole, fronting A435 and Alcester Road South
- Birmingham Road, Alvechurch
- Groveley Lane, Longbridge
- Stourbridge Road, Catshill
- Woodrow Lane, Catshill
- Part of Wythall Green Business Park, Middle Lane
- Billy Lane, Barnt Green
- Stoke Court Farm, Bromsgrove
- Land adjoining 25 and rear of 47 St Godwalds Road
- Ryefields Farm, Shaw Lane, Stoke Prior
- Bleakhouse Farm, Station Road, Wythall (an additional 6.9ha)
- Hillcrest Mobile Home Park, Wythall
- Crabmill Lane, Maypole

- Norton Lane, Wythall
- Hinton Fields, Catshill
- Land East of Callow Hill Road, Alvechurch
- Station Road, Wythall
- Rear of 115 Wildmoor Lane, Catshill

RCBD1 Redditch Cross Boundary Development

Through the Borough of Redditch Local Plan No.4 (BORLP4), Redditch Borough Council is unable to identify sufficient land within its administrative boundary to meet its objectively assessed housing need. Resolving this issue has been dealt with jointly by Redditch and Bromsgrove Council's through the allocation of Bromsgrove District land adjacent to the Redditch Borough boundary. Policy RCBD1 – Redditch Cross Boundary Development, forms part of the Bromsgrove District Plan and is included for information in BORLP4 at Appendix 1. For the purpose of this reporting process and subsequent Examination, Representations relating specifically to Policy RBCD1 were given separate Representor and Representation numbers prefixed 'XB' and are detailed in Appendix 3 of this document. The summary of Representations has been complied jointly by RBC and BDC and reflects a comprehensive list of all the issues received during the Representation Period and is set out below:

- Key issues should be considered prior to allocations such as transport strategies, GI Strategy and Management Plan, Sewer Capacity, drainage impacts, impact on protected species, archaeology and health provision.
- Provision of these sites for Redditch questioned when Bromsgrove cannot meet its own housing need.
- Concern about what stage the school gets implemented in Site 1, if phased later pupils may be forced to travel considerable distances
- Should not discourage 'rat-running', it should be prevented
- Democratic process flawed
- No consultation with Studley Parish Council
- Evidence base omission of West Midlands Local Transport Plan
- Redditch Eastern Gateway Economic Impact Study (June 2013) - factually incorrect. P.50 states access from Far Moor Lane not lane off A435
- Difficult to consider the responses made by the Councils to the previous representations
- There is no mutual benefit to Bromsgrove District
- Pressure from Birmingham may mean further loss of Green Belt contributing to further unacceptable loss of Green Belt
- Duty to Cooperate has been used unreasonably to require over 50% of the Redditch housing requirement in Bromsgrove
- No methodology for the scoring of sustainability appraisal was published
- No independent review of the SA scoring or responses to objections
- Implied that an evidenced argument could impact on the Council's proposals, but planners abdicate responsibility to the Planning Inspector rather than address issues

- Inconsistent to allocate these Green Belt sites considering what is said in Bromsgrove's housing options document about Green Belt.
- Inconsistent with Green Belt criteria in the NPPF
- Redditch Green Belt study (Jan 2013) doesn't consider Site 1
- Jobs need to balance the people, rather than becoming a dormitory housing area.
- WCC Transport consultants have a conflict of interest
- RBC Exec papers not available in time for deputations or questions to be put forward
- Reassurance sought of appropriate flood mitigation downstream of Redditch
- Brockhill East should be allocated for 700 not 600 dwellings
- Policy should identify safeguarded land for beyond the plan period
- The words 'up to' should be deleted in relation to the 40% affordable housing target
- 'Minimum' of 3,400 not appropriate, when 6,400 is 'approximate'

HOUSING GROWTH DEVELOPMENT STUDY

- Flawed analysis / inconsistent approach to analysis of sites in the study and SA
- Highways evidence/information insufficient for analysis of sites
- Highways information received at a later stage undermines the chosen sites
- Concerns about motorway links have not been considered
- Analysis has not taken into account the impact of other new housing proposals in Bromsgrove
- Support concept that Redditch needs cannot be fully met and acknowledge need for cross boundary development
- Deliverability of the sites
- Land ownership issues
- Study makes incorrect and misleading statements about the assessment and suitability of Webheath ADR for development
- Planning Statement to support policy RCBD1 does not include funding commitments to the school
- Consultation with WCC Highways started too late
- No CIL in place to support delivery of infrastructure
- View of residents not taken in to account properly
- Concerns regarding infrastructure delivery and funding
- Bromsgrove policy has not been applied (Bromsgrove town sitting in a bowl and maintaining that it should not spill over that bowl), but under duty to cooperate it is supposed to be a two way negotiation.
- Redditch SHLAA should be reconsidered to identify additional land and increase densities
- Objection to Area 5 not being proposed for development
    - Heritage issues should be challenged
    - Question whether the case for re-opening the investigation into Site 5 being used for housing being re-opened as promised
    - Mitigation could be provided
- Support for development at Brockhill (Site 2)

    - There is scope for housing on the site
- Objection to development at Brockhill (Site 2)
    - No reassurance for open space to be adopted given previous history at Brockhill
- Objection to development at Foxlydiate (Site 1)
    - Pollution issues
    - Flooding / water drainage issues and effects on the Bow Brook corridor
    - Site is not deliverable in 5 year period because of sewage issues
    - Costly site to develop
    - The Bow Brook Study should be taken into consideration
    - Impact on the aquifer / water quality issues
    - Sewerage disposal will require pumping
    - Costs associated with the consequences of flooding to existing properties
    - There are refuse sites on the land
    - The masterplan does not provide enough detail / not adequate to determine delivery
    - Other sites for development are more appropriate
    - No alternative sites have been proposed if the site cannot be delivered
    - Requires major road infrastructure to provide access to the site
    - Access to the site would require link to the PRN which would be contrary to Policy 19 (v)
    - The Transport and Highways evidence to support the site does not provide factual evidence and relies on assumptions. No detail on engineering works necessary
    - Highway safety issues
    - Impact on the country lane network
    - Significant impact on the historic environment
    - Biodiversity impacts
    - No response from officers about the impact of Site 1 on The Saltway
    - People with reduced incomes need good access to employment
    - There will be disruption to residents until 2030
    - Loss of green belt
    - Capacity at nearby schools is not known
    - No evidence of topography and historic geography of the site
    - RBC has not demonstrated that all other development options/ alternatives have been considered
    - Water Source Protection Zones within the site
    - Severn Trent comments ignored with respect to sewage
    - Contrary to NPPF paragraphs 7, 95 and 197
    - A recent planning application was refused in May 2013 for development on Webheath ADR on transport grounds
    - 2,800 dwellings is not deliverable or viable in the period to 2030
    - Reduce capacity and allocate land at Bodeseley or Brockhill West
    - Site 1 should be expanded further

- Bordesley is a better option than Webheath and Foxlydiate/Support for Bordesley (Area 8):
    - Flood risk and zones and flood defences worse at Webheath/Foxlydiate rather than Bordesley

    - Difficult foul drainage and wastewater drainage being unsustainable at Webheath/Foxlydiate rather than Bordesley
    - Surface water run-off significant and unsafe on Webheath/Foxlydiate rather than Bordesley
    - Cheaper for water/ sewage treatment
    - Source protection zones at Foxlydiate
    - Impact on climate change
    - Highways distance to motorways and access to major routes better at Bordesley rather than Webheath/Foxlydiate
    - Distance to hospital and impact of joint service review worse at Webheath/Foxlydiate rather than Bordesley
    - Distance to recycling facilities and waste disposal site worse at Webheath/Foxlydiate rather than Bordesley
    - Distance from Redditch town centre/railway station worse at Webheath/Foxlydiate rather than Bordesley
    - Accessibility better to schools, local shops, leisure facilities at Bordesley rather than Webheath/Foxlydiate
    - Public transport better at Bordesley rather than Webheath/Foxlydiate
    - Rail link from Alvechurch to Redditch is being upgraded
    - Distance to employment sites better at Bordesley rather than Webheath/Foxlydiate
    - Lack of local employment
    - Visual sensitivity greater at Webheath/Foxlydiate rather than Bordesley
    - Size of development greater than 3km at Webheath/Foxlydiate rather than Bordesley
    - Green belt impact worse at Webheath/Foxlydiate rather than Bordesley
    - Green belt gap to Alvechurch still remains at Bordesley, but would be lost with merging of Webheath and Foxlydiate
    - Damage to wildlife habitats
    - Green Infrastructure impacts worse at Webheath/Foxlydiate rather than Bordesley
    - School infrastructure provision worse at Webheath/Foxlydiate rather than Bordesley
    - Provision of bypass can be delivered with Bordesley
    - Electricity providers preference is for sites east of the River Arrow
    - Foxlydiate site has the best agricultural land
    - If 40% are affordable, distance to Redditch is a key issue favouring Bordesley
    - Bordesley would not put so much pressure on the A38 and Slideslow roundabout
    - Bordesley has existing highway capacity unike Webheath/Foxlydiate
    - Has direct access to M42
- Not taken account of reports from Severn Trent Water stating their preference for Bordesley site rather than Webheath and Foxlydiate.
- There are several sites considered in the Broad Area Appraisal that should have been considered in the Focussed Area Appraisal.
- There is scope for development within Areas 5 and 6.
- Public transport is required on all sites so it isn't a determining factor in site selection. Bespoke service is required on all sites.
- Criteria used is too limited and lacking imagination

- Redditch golf courses should be relocated in Bromsgrove Green Belt so that housing is closer to Redditch Town Centre
- Development Study May 2013 by Bentley Pauncefoot Parish Council (BAAG?) clearly shows that Bordesley is a better option than Foxlydiate

CONSULTATION

- Consultation responses from the LPA on the Housing Growth Development Study did not adequately address concerns raised by residents
- No leaflets sent to all residents
- Lack of choice about proposed development locations during consultations. Bromsgrove officers admitted that they had chosen not to consult on more than two options. By not consulting on a range the process is contrary to Bromsgrove's SCI
- Advertising is poor
- Drop in sessions were poorly advertised, had to ask for events to be held where development is proposed
- Planners are biased and subject to Council influence
- Too much consultation material and not enough time to respond
- Not everyone is able to view documents online and not enough printed copies were available

Omission Sites:

- Brockhill West
- Bordesley Farm

BDP 6 Infrastructure Contributions

- Concerns that viability may impact on delivery
- A definition of infrastructure is needed
- The policy should be about more than just transport
- Green Infrastructure should be eligible for CIL

BDP 7 Housing Mix and Density

- 'Focus on' delivering 2 and 3 bedroom dwellings is ambiguous and inflexible
- Policy should reflect the need to build to meet market demands
- There is a need for bungalows and low cost market housing
- The term 'large sites' should be defined

BDP 8 Affordable Housing

- Support for the words 'up to 40%' as it provides flexibility
- Objection to the use of 'up to' as it will reduce affordable housing delivery
- The reference to Lifetime Homes is inconsistent with BDP10

- Clarification needed over the amount of affordable housing to be provided over the plan period
- Some of the assumptions used in the Affordable Housing Viability Assessment are not robust
- 30% is a more realistic target
- Affordable housing need has been over-estimated

BDP 9 Rural Exception Sites

- Support for the inclusion of BDP9 and the reference to cross subsidy
- In exceptional circumstances housing should be allowed in rural hamlets other than the small settlements listed in Policy BDP3.7 e.g. Portway and Tardebigge

BDP 10 Homes for the Elderly

- Support for policy addressing this issue
- Policy should mention need for bungalows, low cost market housing and the need for provision of elderly accommodation in Green Belt locations

BDP 11 Accommodation for Gypsies,Travellers and Showpeople

- The safeguarding of existing sites in appropriate locations is supported
- The policy is inflexible and should have a mechanism to react to the findings of the GTAA
- The needs of travelling showpeople are not addressed

BDP 12 Sustainable Communities

- Support in general for policy on this issue
- Greater detail in the supporting text to clarify West Mercia Police's remit is not confined to the provision of an emergency service
- The policy is inappropriate when applied to the emergency services
- Policy should be set within the context of S122 of the CIL Regulations
- A definition of community facilities is needed

BDP 13 New Employment Development

- Supported as employment policies mirror employment led development strategy of SWDP
- Policy is out of step with LEP and government stance on economic recovery and is not an appropriate growth strategy
- Should be provision for the expansion of existing major businesses

BDP 14 Designated Employment

- Support for the protection of employment sites
- Should be amended to take account of substantial businesses in the Green Belt that wish to grow
- Not based on credible evidence and not in line with LEPs.

BDP 15 Rural Renaissance

- The underlying principles for conversion should be more clearly set out
- The conversions element fails to take account of the changes of use that can now occur without the need for planning permission.

BDP 16 Sustainable Transport

- General support for the policy on sustainable transport matters
- Greater recognition needed for the role of new and expanded park and ride schemes at railway stations
- Need to reference West Midlands Local Transport Plan and the role of Centro
- Policy is undermined by cuts made by the County Council to the funding of public transport

- **BDP 17 Town Centre Regeneration**
- Intention to regenerate the town centre is supported
- Lack of guidance on the location of evening/night-time economy uses and how the negative side effects will be managed
- Car parking prices in the town centre are unreasonable
- The policy is overly long and convoluted
- Undertake further flood risk assessments on Town Centre sites

BDP 18 Local Centres

- Policy is overly restrictive in terms of preventing the expansion of shopping areas
- Small scale medical facilities should be supported in these areas e.g. dentists, chiropodists etc

BDP 19 High Quality Design

- Reference should be made to Village Design Statements and Parish Plans
- Clause c) is repetitive and duplicates clause a)
- The Housing Standards Review intends to phase out the Code for Sustainable Homes and therefore all references should be deleted
- References to best practice guidance are unnecessary
- Objectives of Secured by Design and Building for Life can be incompatible

- No justification to make Building for Life mandatory
- The requirements of the policy need to be viability tested
- Policy provides too much detail which would be more appropriate in an SPD

BDP 20 Managing the Historic Environment

- Policy is too prescriptive and provides no distinction between designated and non-designated assets
- Reference to declaring new conservation areas is superfluous
- BDP20.12 and BDP20.19 are unnecessary
- BDP20.10 is too restrictive

BDP 21 Natural Environment

- Policy goes beyond NPPF requirements and should be modified
- No justification for new developments to create core areas of high nature conservation value
- Reference to the protection of ancient trees is needed

BDP 22 Climate Change

- General support for the policy
- Amend to make it clear that it is for developers to determine the mitigation from carbon emissions (allowable solutions)
- Clear cross-reference with BDP23 is needed
- Criteria b) and f) conflict recent Government Consultation on Allowable Solutions

BDP 23 Water Management

- Overall intentions of the policy are supported
- Costs associated with the policy may render projects unviable for small businesses
- No justification for accelerated code level in the Code for Sustainable Homes
- Planning policy should not duplicate the legislative requirements of the Water Acts

BDP 24 Green Infrastructure

- Support for the policy and holistic approach to GI across the county
- References to GI concept plans and statements are welcomed

BDP 25 Health and Well Being

- General thrust of the policy is welcomed
- Evidence in the Open Space, Sport and Recreation Study is out of date
- Playing pitch strategy has not been completed
- Proportionate assessment of built sporting provision is needed

Sustainability Appraisal

- Assessment of the Ravensbank site should be amended to reflect the proximity to Gorcott Hall (Grade II*)
- Assessment of the Hagley site should be amended to reflect the proximity of Hagley Hall and its associated Historic Park which are both grade I listed.
- Greater reference to the presence of Source Protection Zones and groundwater quality is required in relation to the assessment of Policy RCBD1
- Greater detail on the presence of Source Protection Zones and ground water quality is required in relation to the assessment of the Perryfields Road site

Habitat Regulations Assessment

- Support for the conclusion that the BDP would not result in any significant effects on European sites, alone or in combination with other plans and projects.

Appendix 1: Letter to consultees

Bromsgrove District Council
www.bromsgrove.gov.uk

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e-mail: strategicplanning@
bromsgroveandredditch.gov.uk

Dear Sir / Madam

30th September 2013

Bromsgrove District Plan 2011-2030 Proposed Submission Document

Bromsgrove District Council has published its proposed submission version of the Bromsgrove District Plan 2011-2030. This plan which was previously called the Core Strategy sets out how the Council wishes to see the district develop up to 2030. This version of the plan follows on from a number of previous versions which have been the subject of public consultation in recent years. Included in the plan are the locations for new housing and employment development, a strategy for regeneration of the Town Centre, which all sit alongside policies which protect the valuable natural and historic environment across the District.

We are now inviting representations to be submitted to the Council on the soundness of this plan. The plan and all its supporting evidence along with full details on how to make responses on soundness can be accessed via our website at www.bromsgrove.gov.uk/bdp further details on the representations period and how to get involved can be seen on the reverse of this letter. **The representation period runs from the 30th September to the 11th November 2013.**

This Representation Period aligns with the Borough of Redditch Local Plan No. 4 Representation Period in relation to Redditch-related housing development located in Bromsgrove District. The Redditch Cross Boundary Development policy appears in the Bromsgrove District Plan 2011 – 2030 as Policy RCBD1 and in the Borough of Redditch Local Plan No.4 as Appendix 1. If you wish to make representations relating to this specific matter, you can respond to either Council, as these particular representations will be dealt with jointly. The format of your representation should follow the same guidelines and use the same response forms as all other representations.

Should you require any assistance with making representations please contact us using the details provided overleaf and we will be more than happy to help with any queries.

Yours Faithfully

Mike Dunphy
Strategic Planning Manager
Bromsgrove District Council

Appendix 2: Regulation 19 Advertisement

Bromsgrove District Council **Planning and Regeneration**

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED) THE TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012 REGULATION 19: PUBLICATION OF A LOCAL PLAN

Statement of Representations Procedure

Title of document:
Bromsgrove District Plan 2011-2030 Proposed Submission Version

Subject matter and area covered:
Bromsgrove District Council has published its Proposed Submission version of the Bromsgrove District Plan for formal representations prior to its submission to the Government for independent examination.

The Bromsgrove District Plan Proposed Submission document outlines the strategic planning policy framework for guiding development in the District up to 2030. It comprises a long-term vision and strategic objectives, a development strategy, key policies, strategic site allocations and a monitoring and implementation statement.

Period within which representations must be made:
Representations in relation to the 'legal compliance' and 'soundness' of the BDP Proposed Submission document can be made over a six-week period, starting on Monday 30th September 2013. Representations must arrive no later than 5.00pm on Monday 11th November 2013.

How to submit representations:
Representations should be made using the prescribed form.

By post: **The Strategic Planning Team**
Planning and Regeneration
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

By email: **strategicplanning@bromsgrove.gov.uk**

By Fax: **01527 881313**

Planning Officers will be available to provide guidance on how to complete Representation Forms at The Council House and/or Customer Service Centre during the following dates/times:

- Monday to Friday (30th Sept -11th Nov): 9am to 5pm (Main Reception)
- Tuesday (1st Oct, Conference Room): 4pm to 8pm and Thursday (17th Oct and 31st Oct, Committee Room): 4pm to 8pm
- Saturday (5th Oct, 19th Oct, and 2nd Nov): 9.00am to 11.30am (Customer Service Centre/Dolphin Centre)

Officers will also be available at Redditch Town Hall during the following dates/times:

- Monday to Friday (30th Sept -11th Nov): 10am to 4pm (Main Reception)
- Tuesday (8th Oct, 22nd Oct, and 5th Nov): 4pm to 8pm (Committee Rooms)
- Saturday (12th Oct, 17th Oct and 31st Oct): 9.00am to 11.30am (Committee Rooms)

Notification request:
Representations may be accompanied by a request to be notified at a specified address for any of the following:

(i) that the BDP has been submitted for independent examination

(ii) the publication of the recommendations of the person appointed to carry out an independent examination of the BDP

(iii) the adoption of the BDP

Statement of Fact
The BDP Proposed Submission document, the Representation Form and Guidance Notes, together with the Sustainability Appraisal Report, Statement of Consultation and relevant supporting background documents are available to view, download and comment on from Monday 30th September 2013 at **http://www.bromsgrove.gov.uk/bdp.**

Paper copies of all the documents are available for inspection at:

Bromsgrove District Council,
The Council House, Burcot Lane, Bromsgrove, B60 1AA.

Opening Hours: Monday to Friday 9.00am to 5.00pm

A paper copy of the BDP Proposed Submission document is also available for inspection during normal opening hours at:

- **Bromsgrove District Council Customer Service Centre, Dolphin Centre, School Drive**
- **Alvechurch Library**
- **Bromsgrove Library**
- **Wythall Library**
- **Catshill Library**
- **Hagley Library**
- **Rubery Library**

Paper copies of the Representation Form and accompanying Guidance Notes are also available at all of the above locations during the six-week representation period.

Bromsgrove District Council
www.bromsgrove.gov.uk

Appendix 3: List of Representors

Respondent No.	Name	Company/Organisation
B001		Charles Church Developments
B002		Homes and Communities Agency
B003	Mr Arnold	
B004	Mr MacLachlan	Barnt Green Parish Council
B005		Kler Group
B006		Taylor Wimpey
B007		Gallagher Estates
B008		The Church Commisioners for England
B009	Mr Farrell	Belbroughton Parish Council
B010	Ms Dyson	Bentley Pauncefoot Parish Council
B011		Seafield Pedigrees
B012	Mr Stapleton	
B013		Taylor Trustees
B014		Oakland International
B015		Mr J Matthews and Mr S Jones
B016	Mr Nazir	Birmingham City Council
B017	Ms Brookes	
B018	Ms Burnett	Canal and River Trust
B019		Bovis Homes
B020	Ms Davies	Centro
B021	Mr Harrison	The Coal Authority
B022	Dr King	CPRE
B023	Ms Stone	Dodford with Grafton Parish Council
B024		Royal Mail
B025		Phoenix Life Limited
B026	Mr Yates	Trustees of the Yates Trust
B027		Telstar Ltd
B028	Reynolds Family	
B029		Catesby Estates Ltd & Miller Homes Ltd

B030		Stoke Prior Development Ltd
B031	Mr Gerner	
B032		Gallagher Estates
B033	Mr Griffin	Pineview Parks Ltd
B034		Hagley Parish Council
B035		Birmingham Property Group
B036	Mrs Green	Home Builders Federation
B037	Mrs Harrald	Hereford & Worcestershire Earth Heritage Trust
B038	Dr Hotham	
B039		Bellway Homes (west Midlands) & Bloor Homes Western
B040	Mr Hutchins	
B041	Mr Hurst	
B042	Dr King	
B043	Mrs King	Lickey & Blackwell Parish Council
B044	Mr Yarwood	National Federation of Gypsy Liaison Groups
B045	Mr Latif	
B046		Cawdor Capital
B047		Wm Morrison Supermarkets plc
B048		St Francis Group
B049		RPD Management
B050		One Property Group UK Ltd
B051		St Modwen Developments Ltd
B052		Bournville Village Trust
B053		Henry Woldrige
B054	Mrs Harrison	
B055	Mr May	Rowney Green Association (Residents' Association)
B056		Wild, Johnson, McIntyre and Fisher
B057	Mrs Milward	Taylor Wimpey UK Limited
B058	Mrs Shephard	

B059	Mr Barlow	Solihull Metropolitan Borough Council
B060	Mr Berry	Sport England
B061		Brierley Properties Ltd
B062	Mr Davies	South Worcestershire Councils
B063	Mr Leather & Others	CJH Land Limited
B064		Bromsgrove District Housing Trust
B065	Ms Freeman	The Theatres Trust
B066	Mrs Latham-Marr	
B067		Piper Homes
B068	Mr Hughes	West Midlands Joint Committee
B069	Mr Williams	
B070	Mr Hunter	Worcester, Birmingham & Droitwich Canals Society
B071	Mr Bloomfield	Worcestershire Wildlife Trust
B072	Mr Horovitz	Worcestershire County Council
B073	Mr Milward	Woodland Trust
B074		Billingham and Kite Ltd
B075	Ms Dunn	Wyre Forest District Council
B076	Ms Cleaver	Wythall Residents Association
B077	Mr Tomlinson	Heyford Developments Ltd
B078	Mr Torkildsen	English heritage
B079	Mr Tyas	Environment Agency
B080	Mr Somers	Gladman Developments
B081	Mr Taylor	Highways Agency
B082	Mrs Fleming	Natural England
B083		Gallagher Estates
B084		Gallagher Estates
B085		Stoford Ltd and Gorcott Trust
B086		Café Quote

B087		West Midland HARP Consortium
B088	Mr Morgan	West Mercia Police and Hereford & Worcester Fire and Rescue Service
B090		Telstar Limited
B091	Mrs Mullet	Clent Parish Council
B092		Miller Strategic Land Southern and Regional Developments and Persimmon Homes South Midlands
B093		Persimmon Homes South Midlands (Brockhill East)
B094	Mr Cook	
XB001	Mr Tomlinson	Heyford Developments
XB002	Mr Tyas	Environment Agency
XB003	Mr Somers	Gladman Developments
XB004	Mr Taylor	Highways Agency
XB005	Mrs Fleming	Natural England
XB006		Gallagher Estates
XB007		Gallagher Estates
XB008		Café Quote
XB009		West Midland HARP Consortium
XB010		Bentley Area Action Group
XB011	Mr Whitworth	
XB012	Mr Porteous	
XB013	Mr Whittaker	
XB014		Miller Strategic land Southern and Regional Developments and Persimmon Homes South Midlands
XB015		Persimmom Homes South Midlands (Brockhill East)
XB016	Dr King	CPRE

XB017		Telstar Limited
XB018	Mrs Campbell	
XB019	Mr Morgan	West Mercia Police and Hereford & Worcester Fire and Rescue Service
XB020		Webheath Action Group
XB021	Mrs Duggan	South Worcestershire Development Plan
XB022	Mr Boss	
XB023	Mr Rose	
XB024	Mrs Bradnick	Saleway Parish Council
XB025	Mrs Mortimer	
XB026	Mrs Stevens	BAAG
XB027	Mr Stevens	BAAG
XB028	Mr Matthews	
XB029	Mr Adamson	
XB030	Ms Coffey	Severn Trent Water Ltd
XB031	Mr Taylor	Highways Agency
XB032	Mrs Spence	
XB033	Mr Moss	
XB034	Mr Harrop	
XB035	Mrs Hampshire	
XB036	Mrs Frost	
XB037	Mrs Every	
XB038	Mr Cotterill	
XB039		Café Quote Ltd
XB040	Ms Stuart	
XB041	Mr Manley	
XB042	Mr Griffiths	
XB043	Mrs Griffiths	
XB044	Mrs Bourne	
XB045	Mr Bourne	
XB046	Ms Crawford	Crowle Parish Council
XB047	Mr Hopkins	
XB048	Mr	

	Moberley	
XB049	Mr Bush	
XB050	Mr Haigh	
XB051	Mrs Morgan	
XB052	Mr Barber	
XB053	Mr Stevens	
XB054	Mr Boss	
XB055	Mr Keevil	
XB056	Mr Horovitz	Worcestershire County Council
XB057	Mr Heron	
XB058	Mr Keatley	
XB059	Mrs Rowley	
XB060	Mrs Jewell	
XB061	Mr Stratton	
XB062	Dr Carter	
XB063	Mr Warby	
XB064	Mr Bedford-Smith	

We will consider reasonable requests to provide this document in accessible formats such as **large print, Braille, Moon, audio CD or tape or on computer CD**

"Need help with English?" Contact Worcestershire HUB, Bromsgrove 01527 881288

'Potrzebujesz pomocy z angielskim?' Skontaktuj się z Worcestershire HUB, Bromsgrove, tel.: 01527 881288

"İngilizce için yardıma ihtiyacınız var mı?" 01527 881288 numarayı arayıp Worcestershire HUB, Bromsgrove ile irtibata geçin

"ইংরাজির জন্য সাহায্য চাই ?" 01527 881288 নম্বরে উস্টাশায়ার হাব [HUB] ব্রমস্‌গ্রুভ [Bromsgrove]-এ টেলিফোন করুন

''ਅੰਗਰੇਜ਼ੀ ਵਿਚ ਮੱਦਦ ਚਾਹੁੰਦੇ ਹੋ?'' ਵੁਰਸੈਸਟਰਸ਼ਾਇਰ ਹੱਬ [HUB] ਨੂੰ ਬਰੋਮਸਗ੍ਰੋ [Bromsgrove] ਵਿਖੇ 01527 881288 'ਤੇ ਟੈਲੀਫੋਨ ਕਰੋ

"انگریزی میں مدد چاہتے ہیں؟" ورسیسٹر شائر ہب [HUB]، برومزگرو [Bromsgrove] میں 01527 881288 پر رابطہ کریں

Bromsgrove
District Council
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