

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)

Harris Lamb Planning Consultancy (HLPCF) on behalf of Birmingham Property Group (BPG)

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

Page: 4	Paragraph:	Policy:
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: <input type="checkbox"/>	No: <input type="checkbox"/>
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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: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
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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 checked="" type="checkbox"/>

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Under the Duty to Co-operate section on page 4 of the draft plan it is confirmed that the District Council have worked collaboratively with Redditch Borough Council and Stratford-on-Avon District Council in order to help meet Redditch Borough's growth requirements. This approach is fully supported, however, there is also significant pressure for Bromsgrove District Council to proactively work with Birmingham to meet its clearly established growth requirements, however, the draft plan does not reflect this in any way.

The Bromsgrove District will need to assist Birmingham in meeting its identified 33,000 dwelling shortfall. The plan has not been prepared to allow it to assist in meeting this requirement. It is quite clear that Bromsgrove District Council will be a key partner with Birmingham City Council in meeting the City's housing and employment requirements. However, the plan is not able to respond to this satisfactorily. It is not flexible enough to adapt to 'rapid change' (NPPF paragraph 14) and respond to the evidence that is being published on addressing Birmingham City's housing shortfall. In the early part of 2014 a document will be produced by the LEP that will provide further guidance on housing and employment growth across the LEP area including addressing housing delivery. This will have clear implications for Bromsgrove District, however, it is not clear how the plan will be able to respond to this document.

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)

Consultation on the draft BDP is premature. It is clear that Birmingham City Council will have to rely upon its neighbouring authority areas to help meet its significant overflow requirements. There is a wealth of evidence on this matter. In the early part of the new year the LEP will produce its strategic growth document that will provide a clear indication of where housing should go. It is our view that the emerging Bromsgrove Plan will have to be reviewed in the light of this document and its policies updated accordingly. That being the case, further consultation will be required on the plan before it is submitted.

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 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)

At the present time no decision has been made as to whether it is appropriate for HLPC to appear at the forthcoming examination on behalf of BPG. We would, however, like to reserve the opportunity to attend the examination.

Signature: 	Date: 11/11/13
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Part B (see Note 1 and Note 8 para 4.2)

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Name or Organisation (see Note 8 para 4.1)

Harris Lamb Planning Consultancy (HLPC) on behalf of Birmingham Property Group (BPG)

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

Page:	Paragraph:	Policy: BDP3
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:

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Policy BDP3 advises that prior to 2023 a full Green Belt review will have been completed. It is, necessary for a Green Belt review to be undertaken now in order to help meet Birmingham City's growth requirements.

Birmingham City has produced a SHLAA that indicates that the capacity of sites and the potential timing for their release. Set out below is a table that compares the Birmingham SHLAA's identified housing capacity with the City's annualised housing requirement. The shortfall against the annual housing requirement is identified.

	Housing Supply (SHLAA)	Annualised Requirement (based on provision of 84,000 dwellings)	Shortfall based on provision of 84,000 dwellings
Years 0-5	9,502	21,000	11,498
Years 6-10	15,954	21,000	5,046
Years 10 +	16,046	42,000	25,959

It is, therefore, quite clear that there is insufficient capacity within Birmingham City for the Council to be able to demonstrate a five year supply of deliverable sites against its emerging requirement. This is a requirement of NPPF paragraph 47. Indeed, the shortfall amounts to in excess of 11,000 dwellings. This clearly indicates that the neighbouring authorities will be required to work with Birmingham City Council in the short term to help meet its growth requirements.

It is noted that Bromsgrove District Council proactively undertook a Green Belt review of land around Redditch once it became apparent that Redditch was unable to meet its own growth requirements within its administrative boundary. Exactly the same set of circumstances exist in Birmingham City, however, the Bromsgrove District Plan does not react in a positive fashion to assist Birmingham City Council in meeting its growth requirements. It is evident that work needs to be undertaken in the short term given the timing of release of Birmingham's identified sources of housing supply.

Whilst it is appreciated that Bromsgrove Council were not the only local authority that are required to meet Birmingham City's growth requirements one of the key factors that will need to be considered is a comparison between suitability of various options for growth around the Birmingham administrative area. In the case of Bromsgrove District this would include an assessment of the suitability of releasing the land from the Green Belt immediately adjacent to Birmingham City. Without this information it is not possible to properly assess the role Bromsgrove Council can play in helping Birmingham meet its emerging housing requirements.

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)

The text of policy BDP3 will be revised. Paragraph 3.1 should be amended to advise that a Green Belt review will be undertaken with immediate effect in order for the District to identify the most appropriate sites that can be released in order to help meet Birmingham City's growth requirements.

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.


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No, I do not wish to participate at the oral examination	<input type="checkbox"/>
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At the present time no decision has been made as to whether it is appropriate for HLPC to appear at the forthcoming examination on behalf of BPG. We would, however, like to reserve the opportunity to attend the examination.

Signature: 	Date: 15/11/13
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Name or Organisation (see Note 8 para 4.1)

Harris Lamb Planning Consultancy (HLPC) on behalf of Birmingham Property Group (BPG)

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

Page:	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)

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Policy BDP4 repeats the statement in policy BDP3 that a Green Belt review will be undertaken in advance of 2023. For the reasons identified in response to policy BDP3 this is inappropriate.

It is noted that part 'B' of the policy advises that the Green Belt Review will be undertaken in order to safeguard land for the period 2030 to 2040 to meet the development needs of Bromsgrove and adjoining authorities based upon the latest evidence. Existing evidence confirms that the Green Belt review is required now as confirmed by the HLPC representations to Policy BDP3, that identify the timing of the release of Birmingham's housing sites.

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Policy BDP4 should be reviewed on the same basis as BDP3. Reference should be made to an immediate Green Belt review in order to identify the suitability of land to help meet Birmingham City's growth requirements.

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Signature



Date:

6/3/13

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Name or Organisation (see Note 8 para 4.1)

Harris Lamb Planning Consultancy (HLPC) on behalf of Birmingham Property Group (BPG)

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

Page:	Paragraph:	Policy: RCBD1.1
Policies Map:	Other document:	

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It is noted that the supporting text to policy RCBD1 advises that the Worcestershire SHMA identifies that Redditch's housing requirement up to 2030 should be 6,380 dwellings. The Redditch SHLAA indicates that Redditch Borough only has capacity to accommodate approximately 3,000 dwellings within its own boundary, leaving a shortfall of around 3,400 dwellings. Therefore Bromsgrove District Council and Redditch Borough Council have worked together in accordance with the duty to co-operate to find preferred locations to accommodate the shortfall. This approach is fully supported.

Exactly the same situation occurs in respect of Birmingham City. There is clear evidence to suggest that Birmingham City Council cannot meet its own growth requirements. This information has been available for some time. However, Bromsgrove District Council have not sought to proactively identify the suitability of land in Bromsgrove to meet Birmingham's growth requirements in the same way that this exercise has been completed for Redditch. There is no consistency in approach and it is highly questionable whether the Council's stance meets the requirements of the duty to co-operate.

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Signature		Date: 1/3/16
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Policy BDP3 sets out the housing target for Bromsgrove and confirms the level of development expected to take place in Redditch. The housing requirement for both authorities has been established by the South Worcestershire SHMA. The South Worcestershire Development Plan Stage 1 examination has recently been concluded. The Inspectors Interim Conclusions have identified a number of flaws with the SHMA's methodology. The SHMA is not considered to provide a robust assessment of housing need. As such the SHMA requires updating. This has direct implications for Bromsgrove and Redditch. A SHMA update is required to inform both plans emerging housing requirements.

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An update to the SHMA is required to ensure that the emerging Local Plan's housing target is robust.

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