

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)

Personal objection

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

Page: 7	Paragraph: 2.8	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)

I do not accept that the Plan is legally compliant, but this objection is not challenging that.

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 type="checkbox"/> NO
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Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)		<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)		<input 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)

See accompanying paper 'Economic Structure of Bromsgrove District'

I have prepared objections that will be made by CPRE and Hagley Parish Council. One or both of these will cite that document. The purpose of this objection is to place that document before BDC as a free-standing 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)**

I support the changes that are being suggested by Hagley Parish Council.

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"/>	YES

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 objection raised relates to a substantial matter that is likely to require fuller exploration at the Examination

Signature:

Date:

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)

Personal objection

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

Page: 32-42	Paragraph:	Policy: BDP5B
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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5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	not	<input 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)

See accompanying paper 'A history of Bromsgrove Housing Supply policy'

I have prepared objections that will be made by CPRE and Hagley Parish Council. One or both of these will cite that document. The purpose of this objection is to place that document before BDC as a free-standing document.

My objection is essentially that some of the Development sites in policy BDP5B should have gone forward as Safeguarded Land, even if this only relates to a small amount of land, in order that the principle of having Safeguarded Land and an uncomplicated mechanism for its release can be included in BDP

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)

I support the changes that are being suggested by Hagley Parish Council.

My proposed changes are explained in the implications section of 'A history of Bromsgrove Housing Supply policy'

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.

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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"/>	YES

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 objection raised relates to a substantial matter that is likely to require fuller exploration at the Examination

Signature



Date: 9 November 2013

The Economic Structure of Bromsgrove District

Peter King, Ph.D.

Paragraph 2.8 of Bromsgrove District Plan picks up a fundamental issue in the economy of the district. However it completely misses the point, by failing to provide any analysis of areas below the whole District level. In consequence, large parts of the Plan are potentially unsound.

The whole Plan has a bias that Bromsgrove town is the centre of the District (which is correct) and that the whole District ought to look to the town as its core. This is not the case at present and any policy seeking to impose that is unsound, or at least impracticable. In a district comprising large rural areas under the shadow of a major conurbation, it is inevitable and unavoidable that a significant proportion of the population will commute into the conurbation. The District would be much poorer if that were not happening.

The result is that the District comprises two rather different communities:

- Urban commuters. They have high salaries; are largely owner-occupiers, often in houses with 4 or 5 bedrooms; and live large commuter villages of the District – Wythall, Alvechurch, Barnt Green and Hagley, also in rural areas and not the fringes of Bromsgrove.
- The large market town of Bromsgrove, together with Catshill and Stoke Prior; perhaps also Rubery. These have significant areas of former council housing (now transferred to BDHT or sold). Employment in these was formerly provided by the salt industry at Stoke Prior (long defunct) and the motor industry, associated with the defunct Austin-Rover works at Longbridge.

Such simplification is inevitably less than the whole truth: exceptions will inevitably be found, but several datasets indicate that there is a large element of truth to it. Under measure after measure, Charford, Sidemoor and Catshill come out as disadvantaged, and Wythall, Alvechurch, Barnt Green and Hagley as the reverse of this.

Travel to work data

The distinction is demonstrated by Travel to Work data from the 2001 census. I cite that because I have not seen any compilation from the 2011 census and do not have the resources (or time) to compile that. The data was compiled as part of the research for WMRSS, but was in the end not used, probably because it did not offer a simple solution on the basis of what policy could be formulated. A draft Travel-to-work (TTW) area classification was prepared, but (to my mind) shows signs of the areas having been defined to meet politicians' wishes as to what they wanted it to show, rather than what the data actually showed. In particular an area west of Bromsgrove (including for Hagley) was placed in a Kidderminster TTW area, when the data actually showed that Dudley and Birmingham were far more significant destinations.

In connection with the consultation on DCS2, I (on behalf of CPRE) attempted to use this data to draw up a potentially robust policy on housing distribution in the district. This was part of an argument for a much lower housing target than in the current SHMA. That proposal was not accepted by the Council.

On the abolition of WMRA and other regional structures by the present government and the revocation of WMRSS, the data collected for WMRSS was explicitly preserved. That data is now some years old, and some of it derives from the 2001 census. It of course all predates

the 2011 census. Nevertheless, it remains valid data, which BDC ought to have used in preparing BDP, unless they had more up-to-date data to replace it. As far as I can determine they do not have more recent replacement data.

The TTW research appears in *Study into the Identification and Use of Local Housing Market Areas for the Development of the Regional Spatial Strategy: Report of Initial Findings* and its *Annex Two: Mapping analysis of travel to work: patterns and areas of influence*. Towards the end of this there were a series of maps showing the proportion of economically active people who travelled to work in particular places (see Table 1).

Table 1: Summary of Local Housing Market Area data

Destination	Proportion	Residential areas
	30%-50%	Barnt Green and Rubery
Birmingham	20%-30%	Uffdown ward (Romsley etc), Alvechurch, Wythall
	10%-20%	The rest of district except parts of Bromsgrove town
Bromsgrove	30%-50%	Bromsgrove town and Catshill
	10%-20%	Woodvale ward (Fairfield etc.) and Stoke Prior
Dudley	20%-30%	Hagley
	10%-20%	Furlongs ward (Clent, Belbroughton, etc.)
Redditch	10%-20%	Alvechurch and rural areas in east of District
Sandwell	10%-20%	Uffdown ward (Romsley etc.)
Solihull	10%-20%	Wythall

Source: WMRA website, accessed during DCS2 consultation. The source was compiled from ONS data from 2001 census.

The table (above) shows all the places to which 10% or more of the population commute. Despite their proximity to the district boundary, neither Kidderminster nor Droitwich feature. The maps in the annexes provide yellow colouring showing many parts of the district in a 0-10% zone for many towns, but this is too low to be useful as a planning tool. With separate data for the four Black Country boroughs (and no published tabulation of the full data), it is difficult to aggregate these, but Dudley and Sandwell are significant in the west of the District. Redditch is significant for Alvechurch and Solihull for Wythall, both in the east of the District. The dominance of Birmingham is especially noteworthy: it is significant everywhere (except parts of Bromsgrove town), and very significant in the northern centre of the District. The destinations for many parts of the district are thus diverse, but most of the district has a strong TTW focus beyond the boundaries of the district.

ACORN data

In contrast, the economic zone of Bromsgrove is very tight area, little bigger than the town together with Catshill. The same picture emerges from ACORN [A Classification of Residential Neighbourhoods] data, which appears in the census information section of the County Council's website (see Table 2). This gives percentages by ward and the Census Lower Super Output Area. I have taken this and applied 2011 population figures to it to produce table 2. In this I have separated the data for Bromsgrove and Catshill ("the Central Area") from that for the rest of the district ("the Rest"). The contrast is very marked. In the Rest, 90% of the population is either classified as Wealthy Achievers or Comfortably Off, but

in the Central Area it is only 65%. At the end of the scale, 30% of the Central Area's people are of Moderate Means or Hard Pressed, but only 6% of the Rest.

MSOA number	Area	Population	Wealthy Achievers	Urban Prosperity	Comfortably Off	Moderate Means	Hard Pressed	Unclassified
1-2	Hagley & West	13688	10004	441	2596	67	244	339
3	Rubery	6634	636	95	5051	432	378	41
4-5	Wythall	11656	5525	77	4748	733	421	148
6&8	Barnt Green and around	13203	9753	158	2827	34	189	242
9	Alvechurch	6371	3035	36	2758	290	177	76
14	Stoke and Rural	7830	4881	60	1389	78	574	851
		59382	33834	867	19369	1633	1983	1697
	% of area's people		57%	1.5%	33%	2.8%	3.3%	2.9%
	% of district people	64%	78%	52%	61%	36%	21%	74%
7	Catshill	5877	1599	40	1620	755	1793	71
10-13	Bromsgrove	28182	8219	758	10862	2111	5716	516
		34059	9818	798	12482	2867	7509	588
	% of area's people		29%	2.3%	37%	8.4%	22%	1.7%
	% of district people	36%	22%	48%	39%	64%	79%	26%
	District Total	93441	43652	1665	31851	4500	9492	2285

Source: Worcestershire County Council census data webpages with LSOA data combined to provide MSOA data.

Broms-grove	MSOA	Population	Index	range
12	Stoney Hill	6901	3.50	2.6 - 4.6
1	Hagley	6268	3.86	2.4 - 6.5
6	Barnt Green	6013	4.57	1.7 - 8
8	Marlbrook	7177	6.83	3.9 - 12
4	Hollywood	5947	9.07	3 - 17.1
5	Wythall	5735	9.44	5.2 - 15.3
14	Stoke & Rural	7887	9.48	2.8 - 14.3
2	Rural west	7256	9.74	6.5 - 13.9
3	Rubery	6502	11.45	7.3 - 14.8
9	Alvechurch	6574	11.52	7.4 - 14.9
10	Sidemoor	6695	14.30	4.8 - 29.3
11	Bromsgrove W	6793	14.72	8.1 - 20.5
7	Catshill	5824	15.78	9.9 - 24.4
13	Charford	8160	20.70	11.3 - 30.1

Source: Data for each LSOA from DCLG website. The index is a weighted average (by population) of the Index of Multiple deprivation for the constituent LSOAs of each MSOA.

Multiple Deprivation Index

I am told that BDC has preferred the Index of Multiple Deprivation 2010 (which is mostly based on 2008 data). Table 3 sets out this data, arranged in order of deprivation by the census Middle Super Output Areas (MSOA). As in the ACORN data, three of the Bromsgrove MSOAs and Catshill are the most deprived. Digging down into the underlying data indicates that there are two quite different kinds of deprivation, which the index has combined. One is the classic urban deprivation: poor income, low skills, and higher unemployment. The other is a kind of rural deprivation, but it seems perverse to describe the areas in question as “deprived”, when they are in fact highly prosperous areas, largely inhabited by well-off commuters.

- House prices are high, because these areas are so attractive to them. Certainly, this means that houses are less affordable to a person on average income, but the majority of residents have above average income and can afford those houses.
- Access to services is certainly poorer, but that is typical of rural areas. However, with the high level of car ownership, access in terms of travelling time (as opposed to distance) is not necessarily worse than in the areas with the classic urban deprivation.

I have not found it possible to illustrate this with a table, because of the difficulty of finding a robust means of combining the factors used to create the index. For the factors just mentioned the ‘worst’ areas are the Rural West, Alvechurch, Marlbrook and Stoke and Rural, with the worst LSOAs being small villages: Rowney Green and Beoley, and Tardebigge on one factor; and Clent and Bell End, and Staple Hill on another. These suffer from rural deprivation, not classic poverty. However on factor after factor (except those just mentioned) Catshill, Sidemoor, and Charford come out as the worst, followed often by Rubery, Hollywood, and Bromsgrove West.

MSOA		Claimants Aug-13	Economically Active	Percentage
6	Barnt Green	31	3561	0.9%
2	Rural west	47	4464	1.1%
12	Stoney Hill	47	4300	1.1%
5	Wythall	38	3435	1.1%
14	Stoke & Rural	63	5593	1.1%
8	Marlbrook	53	4588	1.2%
1	Hagley	42	3570	1.2%
9	Alvechurch	53	3813	1.4%
4	Hollywood	63	3495	1.8%
3	Rubery	90	4064	2.2%
11	Bromsgrove West	112	3933	2.8%
7	Catshill	109	3709	2.9%
10	Sidemoor	127	4279	3.0%
13	Charford	225	5041	4.5%
		1100	57845	1.9%
Data given as "<5" is treated as being 3.				
Source: ONS				

Unemployment

This is further illustrated by Job Seekers Allowance data for August 2013, shown in Table 4. Once again the three worst MSOAs are Catshill, Sidemoor and Charford. These and Bromsgrove West all have over 2.5% unemployment, with 4.5% for Charford. In contrast, Stoney Hill (in east Bromsgrove), the rural areas and most of the large villages (seven MSOAs out of fourteen in the District) have 1.2% unemployment or less.

Discussion

It is thus very clear that the economic and social characteristics of the Central Area and of the Rest are very different from each other. This has been recognised to some extent in past planning policy, in the imposition of a Green Belt and excluding from it, Bromsgrove and six large villages the Green Belt: Hagley, Catshill, Rubery, Barnt Green, Alvechurch, and Wythall.

Bromsgrove town is an irrelevance to much of the district. The east of the District is likely to shop in Solihull or Redditch and the west in Kidderminster, Stourbridge, Halesowen (all historically Worcestershire market towns) or at the Merry Hill Centre; likewise, dramatic arts and other areas of leisure. It is possible that Rubery and Barnt Green may look to Bromsgrove, rather than Birmingham for leisure, but I suspect that the requisite research has not been undertaken.

Paragraph 2.8 of Bromsgrove District Plan thus identifies a major issue. However, by not going on to provide some more analysis of the underlying problem and its sources, paragraph 2.8 is unsound. Since this is a fundamental premise for the Plan, it follows that the soundness of the rest of the Plan must be questionable. The objectives set out in the latter part of that paragraph are certainly desirable. However, they constitute a plan for the regeneration of Bromsgrove town, which is certainly a laudable objective. They do not represent a Plan for the District as a whole.

The objective of reducing out-of-district commuting is perhaps a laudable one in theory, but it is impracticable: Bromsgrove town is largely an irrelevance to much of the Rest, where the dominant source of employment is beyond the district boundaries. This could only be changed by providing large amounts of employment in the Other Large Settlements. That could only be achieved by large scale development in the Green Belt. This would require a review of the Green Belt boundaries, an option that is rightly ruled out by the Plan.

Indeed the objective is discouraging out-of-district commuting could be counterproductive. The evidence assembled in this paper indicates that commuting is the main source of prosperity in the district. Accordingly, the Plan should seek to encourage commuting into the conurbation and be looking to remove barriers to such commuting. There seems to be a correlation: the deprived MSOAs include significant parts of the wards which are outside the 10-20% commuting zone for Birmingham; conversely, the most prosperous MSOAs are those where commuting out of the district, mostly to neighbouring conurbations is most prevalent. This should hardly be a surprise in an area so much under the shadow of the conurbations of the West Midlands County.

Conclusion

If development can resolve deprivation issues, the focus for it should on the deprived MSOAs: Charford, Catshill, and Sidemoor; also Bromsgrove West. The policy of the now abolished WMRSS was that development should be focused on Market Towns and "Other Larger Settlements". Bromsgrove falls into the latter category, but the District contains no (other) Market Towns meeting the WMRSS definition.

The grant of planning applications for most of the ADRs without the completion of the Local Plan Review (required by the Local Plan) has begged the question of which the ADRs should be released for development. By the time the Plan is adopted, it is likely that only a site for 18 houses at Hagley and the Frankley ADR will remain of the housing ADRs outside Bromsgrove. Accordingly the main thrust of the Plan as to where further development should take place is not unsound. However that conclusion is the result of the interplay between an unsound Draft Core Strategy and development pressure, not the result of sound reasoning. The Plan is thus fundamentally unsound and requires major amendment during its Examination to remove its unsound aspects and set the agenda for the development of future planning policy.

Sources and methods

Several of the tables are compilations of data from the sources cited, rather than direct quotations. The author submitted a paper on housing strategy in response to the Consultation on DCS2. This was dismissed in part on the grounds that the District Council's officers did not recognise the data. In one case, this referred to a quinquennial summary of house-building data that the District Council had itself provided under a Freedom of Information Request, to carry back data collected from the Council's Annual Monitoring Report. Dismissing data because the officers do not recognise it is an unscientific practice, smacking of a prejudice against the truth. It is not feasible to set out the full computations in a report of this kind, though the author has been careful to describe the procedure used. Any person having doubt as to the veracity of the data presented in this report will be provided with a copy of the underlying computational file promptly upon this being requested from the author, so that he (or she) can check the calculations. The author has done his best to present the various datasets as impartially as he can. His object has been to avoid any criticism that this paper is partial, rather than dispassionate.

Author

The author of this paper is Dr Peter King. He is a retired solicitor. His doctorate is in Economic History. He is Lead Councillor for Planning for Hagley Parish Council, and has been for over a decade. His first involvement with Strategic Planning was attending two sessions of the Examination in Public of the Worcestershire County Structure Plan in about 1998. He is also a Vice-chairman of the Worcestershire Branch of the Campaign to Protect Rural England, as well as Chairman of its Bromsgrove and Wyre Forest Group.

A history of Bromsgrove Housing Supply policy

Dr Peter King

The question of when and whether Areas of Development Restraint should be released for development should have been one for the Examination. This was the subject of the vast majority of the objections to DCS2. Since this was clearly a highly controversial matter, BDC ought to have held back from granting planning consent on these sites. However, since BDC by its actions has ridden roughshod over the objections, and thus begged the question raised by the objections, it is now pointless to object to this policy. This may have been the result of *force majeure*, following the loss of Planning Appeals on the grounds that the District did not have a 5-year housing supply. The Council ought at that point to have conducted a rapid review, with the object of releasing sufficient land. It ought to have been possible to do this quickly, without awaiting progress on the Core Strategy (now Bromsgrove District Plan).

It is too late to change what has now happened. Nevertheless, there ought to be lessons to be learned from the course of events. This is to ensure that past mistakes are not repeated. This goes back to a period before either the present Strategic Planning Manager or the present Director of Planning were with the Council. Having been involved with planning for some 15 years, I have observed the course of events and it is worth setting out their history.

History

The old Local Plan contained a mechanism for the release of Safeguarded Land (then known as Areas of Development Restraint – ADRs). Before the formal adoption of the old Local Plan in 2004, it had already been necessary to impose a moratorium on new market housing (by SPG11 effective from 14 July 2003). :

- In about 1998, the Local Plan was rejected after an Inquiry, because it did not provide a 15-year land supply. BDC was relying in windfalls to provide the deficit, perhaps with ADRs left over from a previous process. There followed a Green Belt review, which identified further ADRs, leading to a further Inquiry and the adoption of the Plan in 2004. The Head of Local Plans stated that BDC had proceeded with the old Local Plan (despite its expiry date having passed), so as to complete the identification of the ADRs. In the preceding period, no sooner had he identified land, as suitable to be an ADR, than a planning application was made for it. This was no doubt the cause of the over-supply
- I understand this arose from the then local chairman of CPRE writing to the then Head of Local Plans suggesting that BDC was granting a rather large number of planning approvals. He concluded that BDC was rapidly approaching its housing target to 2006.
- When the moratorium initially was proposed, it was thus expected that it would last a couple of years. However, by the time it was adopted, a torrent of applications had been submitted that had to be determined according to the pre-moratorium rules. These applications provided a land supply sufficient to meet the district target to 2011 (or more).
- WMRSS brought in a slightly higher target, but the moratorium was still needed and remained in force. The 2011 target was passed not only in terms of land supply, but of houses built during 2007.
- The moratorium was never formally repealed, but was abandoned in 2009, when BDC lost a planning appeal, because it no longer had a five-year land supply.

- What ought to have happened then was that BDC should have conducted a rapid review of its housing land supply situation and have adopted a Plan releasing some or all of its ADRs. This could have been quite a brief document (perhaps on the scale of SPD11), but should have gone through an Examination process and have been adopted by the full council in 2010 (or at worst 2011). The questions for the Examination would have been:
 - How much land needs to be released: some of the ADRs or all of them?
 - If not all, what should be the split between the town and the village ADRs?
 - Which ADRs should be released to meet the identified target?
- Since the questions would be quite brief, the process ought not to be a long-winded one.
- In practice, the council in 2011 found itself with barely two years' housing land supply. At this point it lost an appeal on an ADR site in Hagley. This opened a floodgate of applications on ADR sites, leading to almost all now having planning consent.
- As chairman of the local CPRE group, I wrote periodically to the Council about this:
 - While the moratorium was still in force, I suggested that the Council should be preparing a replacement of SPD11 to govern what should happen to meet the housing target after 2011 (which under the then current WMRSS was a low one).
 - After the moratorium was abandoned, I suggested that there ought to be a resolution of the full council releasing some ADR land; it did not appreciate that the review would need an Examination.
 - I also complained at planning permission for ADRs being granted when the Local Plan said that they were still "as protected as Green Belt", because no Review had taken place. I asked what resolution had released them and was told that the resolution to consult on DCS2 had done so. However that was a resolution to consult on what future planning policy should be, and whether to release the ADRs; it did not release them. Nevertheless, the Planning Committee proceeded to grant planning consent as if they were released.
 - At two planning appeals, I put forward the argument that planning consent should not be granted because the ADR was not released. So far as there was any response to this argument at all, it was that the appeal was not the right forum to argue this. However, if it was not, what was? It is too late raise it at the BDP examination, because the grant of planning consent is for practical purposes irrevocable.
- Various people raised the same argument on subsequent planning applications. In response to this the Head of Planning advised the Committee that the Plan had expired and therefore the ADRs were available for development. That is actually an irrational argument:
 - The old Local Plan formally expired in 2001 (though it was not adopted until 2004). The ADRs were protected "during the Plan Period". That must mean "as long as the Plan is in force": if the Plan Period meant until 2001 the policy on ADRs would have been pointless. In fact, BDC proceeded with the completion of the Plan despite its expiry, to provide certainty over ADRs. Accordingly the Council in adopting the plan must have intended the ADRs to be protected; according to current terminology "safeguarded".
 - If the Plan had been adopted as the Local Plan for 2001-2011, her argument might have held water, but the date 2011 does not appear in the Local Plan.

- Perhaps the correct statement was the ADR policy was an obsolete one, which was overridden by NPPF.

With the housing land supply situation left at the end of the moratorium, some ADR land had to be released for development. However, this should have been done in a planned way, rather than by the piecemeal grant of planning consent.

Implications

I am concerned for the future that, if there is no Safeguarded Land and no mechanism laid down in Bromsgrove District Plan for its release, a similar situation will arise in the future. The present position is that the Frankley ADR; land for 18 houses at Hagley; and the Perryfields ADR remain without planning consent; as does the employment-related Ravensbank ADR. At the time of writing, the Whitford ADR has an application pending, which may well be approved.

I would not argue for Perryfields or Whitford to be given Safeguarded Land status. This means that there is very little land that could potentially become Safeguarded Land. The Redditch Expansion Sites are much larger than is needed for the immediate needs of Redditch. It is important that the parts of these where development is least acceptable should become Safeguarded Land, if they have to be taken out of the Green Belt at all. This will apply pressure on Redditch to ensure that urban sites are used up before green-field ones and sites nearer that town are used up before more distant ones.

Furthermore, I assume that the Green Belt Review will result in a supplementary Land Allocations Plan. After the time it has taken to get the District Plan through to adoption, I presume that the Council will not want to produce a complete new Plan on completion of the Green Belt Review. This again makes it desirable that a Safeguarded Land policy should be included in Bromsgrove District Plan.

It may be that the Local Plan mechanism for release of ADR sites was regarded as too cumbersome for it to be practicable for it to be followed. The process for delivering a Local Plan, Core Strategy, or District Plan is certainly long-winded, with its multiple consultation stages. On the other hand, the situation that developed where the Planning Committee were able (indeed perhaps constrained) to grant planning consent for ADRs is also unsatisfactory, since it bypass the release mechanism.

Monitoring the land supply situation is an element of the Council's Annual Monitoring Report. I am therefore suggesting that whenever that shows that the supply of land is too low, a proposal should be put forward for a release of Safeguarded Land. That supplementary Land Allocations draft plan should be followed by a single consultation and an examination. This should enable the Council to adopt a revised Land Allocations Plan before the next Annual Monitoring Report is due.

I am suggesting that the Release should aim to be of about three years' land supply, so that the procedure only needed to be invoked about every 2-4 years. Such planned releases should result in a steady stream of land becoming available, enabling the Council to manage a land supply of at least the 5.25 years (5 years + 5%), often somewhat more.

The experience of conducting a Green Belt Review in 1998-2004 seems to have been a bruising process, leading the Council to shy away from undertaking another for the Core Strategy. However conducting a review of Safeguarded sites should be considerably less onerous.

Bromsgrove District Plan – a list of minor changes desirable:

The following issues do not go to the soundness of the Plan, but will add to its clarity or legibility. These are proposed minor changes, which it is hoped will be uncontroversial. Bromsgrove District Council is invited to adopt these as its own proposed changes to the Bromsgrove District Plan.

BDP1.3b – There may be a typo: “retaining” Green Belt, rather than “remaining”.

8.49: This is unclear as to the location of the proposed allotments. Does this refer to the scheme authorised about 4 years ago to the east of Perryfields Road? If so, that road should be named.

BDP3 – delete text BDP1 from the heading.

BDP3.1 The allusion to the Green Belt Review would be better with a cross-reference to BDP4.2.

8.187’s first sentence does not belong where it appears. It seems to be a conclusion to the introductory section and should become a new paragraph 8.172A.

Paragraph 8.189 is inaccurate. The only navigable waterway in the District is the Birmingham and Worcester Canal; accordingly the network does not merely *include* that canal: it *is* the canal. The canal along the foot of the Clent and Lickey Hills from Stourbridge to Bromsgrove, planned in the 1780s, was never authorised or built. Instead, the B&W Canal was built.

Paragraph 8.190 contains an erroneous semi-colon.

Paragraph 8.249 line 5 should read *effect* not *affect*.

BDP17.8 TC1 C lacks a verb, probably should.

Policy BDP17.17-18: Something has gone wrong with the numbering. The last sentence of 17.17 and 17.18 should respectively become items A and B under 17.17. This is for consistency with the respect of the policy.