

**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)

RPS Planning &amp; Development on behalf of Messrs Wild, Johnson, McIntyre and Fisher

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

Page:	Paragraph:	Policy:BDP2 – Settlement Hierarchy
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 checked="" 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)

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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. (see Note 8 para 4.3)

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

### 1.1 Settlement Hierarchy

1.1.1 RPS Planning & Development (RPS) is retained by Messrs Wild, Johnson, McIntyre and Fisher to present representations to the BDP and the proposed Settlement Hierarchy in relation to their specific land interests at land east of Callow Hill Road, Alvechurch to the north of the settlement Location Plan attached.

1.1.2 The Settlement Hierarchy identified through Policy BDP2 is recognised as an appropriate approach in principle by classifying settlements by the level of services they provide. It is accepted that development should also be in accordance with a spatial strategy based on sustainable development principles. Further support is given to the identification of Alvechurch as a Large Settlement within the Hierarchy.

1.1.3 Concerns are raised however in regard to the reference to the requirement for a Green Belt Review to be undertaken to identify new development opportunities through the expansion of settlement boundaries. This is especially pertinent for Alvechurch given that two of the three Development Sites allocated at the village through the BDP have already been granted consent with the new Middle School and Library complex already built and 27 dwellings have been approved to the east of Birmingham under the planning reference 11/0677. Whilst the remaining development site to the west of Birmingham Road is currently under consideration for residential development of 25 dwellings through application 13/0026. Therefore, there are no remaining development site opportunities to be brought forward within Alvechurch once the BDP is adopted. This is despite the requirement for Bromsgrove District Council to take into account cross-boundary housing requirements of neighbouring authorities, for which larger settlements such as Alvechurch would be ideal for and therefore need further residential development sites to be allocated.

1.1.4 Given the situation at Alvechurch and the resulting failure of the BDP to appropriately identify sites to deliver housing and employment requirements for the plan period through a Green Belt Review, the plan must be found unsound.

### 1.2 Green Belt Review

1.2.1 The focus of Messrs Wild, Johnson, McIntyre and Fisher's concerns in relation to the proposed Settlement Hierarchy and overall development strategy is in relation to the necessity to undertake a Green Belt Review through the BDP. Such a review is required before the adoption of the BDP to identify a robust strategic approach to the delivery of development which would allow new 'areas of development restraint' or safeguarded land sites to be identified as the next stage of land allocations and releases from the Green Belt, in order to meet the needs of the Borough and rural communities such as Alvechurch up to 2030, similar to the approach taken by the 2004 Local Plan.

1.2.2 The allocation of new greenfield development sites within the identified settlement hierarchy is considered to be a robust approach to delivering development, which will result in amendments to the settlement boundaries and expansion of larger settlements such as Alvechurch to ensure that the required level of development can be accommodated. For such allocations to take place a Green Belt Review must be undertaken so that sites in addition to the 'Areas of Development restraint' identified by the 2004 Local Plan are proposed in order to ensure an adequate supply of housing development sites within the settlement hierarchy are

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provided.

- 1.2.3 The proposed deferment of the review of the Green Belt until later in the Plan period is entirely inconsistent with the approach advised by the NPPF, specifically NPPF paragraph 157 which advises that Local Plans should *'allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate'*. Furthermore, the preparation of a Local Plan is the most appropriate time to review the Green Belt as Green Belt boundaries are intended to have permanence in the long term to endure beyond the Plan period *"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy - When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."* (NPPF Paragraphs 83 and 84). The proposed submission version of the BDP fails to do this and therefore fails in identifying a development strategy in accordance with the principles of national guidance and will be ineffective in delivering the required quantum of development opportunities.
- 1.2.4 In conclusion, the Bromsgrove District Plan is unsound because of its deferment of the Green Belt review, which is inconsistent with the NPPF and fails to ensure that the proposed settlement hierarchy and development site approach will deliver the required level of housing over the plan period. The failure to undertake a review of Green Belt boundaries ahead of the BDP adoption means that there is a procedure or form of assessment missing from the development plan process, which means that the resulting development plan is unjustified and will fail to deliver the levels of housing required. This is demonstrated by the fact that the last Green Belt review occurred through the last Local Plan (2004), which identified that the settlement boundary of Alvehcurch could be revised without any detriment to the purposes of the Green Belt.
- 1.2.5 The only way to make the BDP compliant is for the Council to undertake a Green Belt review as part of the evidence base so that appropriate settlement boundaries can be altered in accordance with the proposed settlement hierarchy prior to submission of the Plan for examination. The intention of Bromsgrove Council to commence an immediate review of the Green Belt as soon as the BDP is adopted is demonstration of the necessity of the study to be undertaken in order to deliver the strategy approach proposed.

### 1.3 Housing Delivery

- 1.3.1 The Bromsgrove District Plan 2011 - 2030 proposes 7,000 dwellings in Policy BDP3 – Future Housing & Employment Growth, of which 4,600 dwellings to be delivered between the period 2011 – 2023 are outside the Green Belt and 2,400 dwellings in the period 2023 – 2030 are to be identified following a Green Belt review. The dwellings proposed within the Green Belt are recognised as being required to satisfy the Borough's housing requirement but their location and distribution are not identified in any way through the Proposed Submission Version of the BDP. RPS considers that without a Green Belt Review the surety of delivering the 2,400 dwellings within the Green Belt at the larger settlements is not guaranteed.
- 1.3.2 Furthermore, in the Council's document titled "5 Year Housing Land Supply in Bromsgrove" dated 1<sup>st</sup> April 2013, the Council identifies a 5.83 year land supply of deliverable sites as required by Paragraph 47 of the NPPF. Notwithstanding the Council's justification of the

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windfall allowance used, little scrutiny has been given to the deliverability of consented schemes that are relied upon. Recent appeal decisions such as the Dudley Road case at Honeybourne (APP/H1840/A/12/2171339) have maintained that some level of non-delivery should be expected when determining housing land supply to provide a robust and scrutinised development scenario. In the Honeybourne case the Inspector considered that a discount of 10% was reasonable to account for delayed or non-delivery of consented sites over the five year period. RPS would maintain that this discount should also be applied to the SHLAA sites as their delivery is also dependent upon the market, overcoming typical delivery constraints as well as additional factors identified in the SHLAA such as relocation of businesses.

1.3.3 Therefore, the Council's calculation of housing supply should take account of such a factor and suitably discount the housing levels recorded. By adopting this level of scrutiny the 5 year housing land supply would not be reduced to below the requirement but the level of surplus currently identified would be reduced significantly. However, the Council's housing supply calculations have also not taken into account any level of undersupply from 2011 to the adoption of the plan. The resultant shortfall must be attributed within the housing supply calculations and should not simply be dealt with through the identification of commitments, especially when no target figure exists for this period of time and the 386 commitments identified do not reflect the annual level of housing delivery expected post plan adoption. Instead therefore, this period of time should be attributed the same annual rate of housing delivery, which identifies a shortfall provision of 392 dwellings. The recently published National Planning Practice Guidance website recommends this approach to dealing with historic under provision, whether limited to a few years or extended periods of time. Taken this shortfall into account with the requirement to apply a 10% delivery discount, the calculated 5 year land supply would fall short at 4.54years.

1.3.4 Using this up to date methodology it is evident that the identified housing land supply would provide less than the required five years supply. The only solution to identifying sufficient development opportunities and ensuring the plan will deliver the level of growth required will be to undertake a full review of the Green Belt around larger settlement and identify new 'safeguarded land' sites to ensure the areas of development can be released during the later stages of the plan and a comprehensive, long-term approach to delivering development in sustainable locations can be achieved. Accordingly the current BDP does not provide an adequate level of housing to be allocated over the whole of the plan period so fails in being effective in meeting the identified housing needs of the Borough. This is especially important given that the BDP currently accepts that 2,400 houses will need to be allocated within the Green Belt, the implications of this housing land supply review means that the level of housing to be delivered in the Green Belt is likely to increase, with no surety of there being appropriate sites and therefore delivery of the development.

#### 1.4 Soundness

1.4.1 The BDP is unsound as the current approach to site allocations within the proposed settlement hierarchy fails to identify a long term strategic approach to development across the Borough, that will be ineffective in delivering the necessary quantum of development sites and sustain the 5 year housing land supply over the plan period. The BDP does not correspond with national policy contained in the NPPF which requires Green Belt reviews to be undertaken to inform any strategic approach proposed through a development plan (NPPF paragraph 83 - 84).

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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)

## 1.5 Necessary Changes

- 1.5.1 The Bromsgrove District Plan is unsound because of its deferment of the Green Belt review, which is inconsistent with the NPPF and fails to ensure that the proposed settlement hierarchy and development site approach will deliver the required level of housing over the plan period. The only way to make the BDP compliant is for the Council to undertake a Green Belt review as part of the evidence base so that appropriate settlement boundaries can be altered in accordance with the proposed settlement hierarchy prior to submission of the Plan for examination.
- 1.5.2 Through such a Green Belt Review new development sites can be identified to act as safeguarded land development opportunities toward the latter period of the plan, as well as appropriately review the settlement boundaries of all applicable settlements to fulfil the strategic function of the development plan. For example, there would be opportunity for the settlement boundary of Alvechurch to be examined and appropriate areas released from Green Belt allocation for immediate and future development through the identification of development sites and safeguarded land, as advised by NPPF (paragraph 58).
- 1.5.3 The Bromsgrove District Plan is based upon an incorrect calculation of the housing supply due to its failure to take into account the historic shortfall and provision and the necessity to apply a discount to take into account development failures or delays to delivery. Appropriate changes to the level of housing supply should be made and, as a result, the level of initial housing delivery will need to be increased, which will mean that the delay in undertaking a Green Belt review will have serious implications in respect of the identification of sufficient development sites and proposal of allocations through the plan. This approach would be inconsistent with the NPPF and fails to ensure that the proposed development strategy will deliver the required level of housing over the plan period. The only way to make the BDP compliant is for the Council to review their housing supply calculations and apply a rate for the under-provision of planning consents as well as additional provision for meeting the shortfall of housing since 2011 when the plan is intended to start from whilst undertaking a full Green Belt Review as part of the evidence base for the submission version instead of delaying this process until after the plan is adopted.
- 1.5.4 In terms of additional development and future safeguarded land sites for Alvechurch, the land east of Callow Hill Lane is an example of the existence of a suitable site that has little or no Green Belt function due to its relationship to the raised section of the M42 motorway. As identified by the attached plan the location of this promoted site is closely related to the existing proposed development sites at Alvechurch, especially the proposed housing allocation 'west of Birmingham Road'. The allocation of the promoted East of Callow Hill Road site could contribute toward the longer-term development needs of Alvechurch that could be timetabled for delivery much later in the plan period or beyond. The appropriate time to consider the potential of sites such as the land east of Callow Hill Lane to contribute toward housing targets, is during a Green Belt review that the Council has failed to undertake for the BDP to be sound.
- 1.5.5 Map 2 – Alvechurch should be suitably revised to include the allocation of additional development sites and Safeguarded land sites to identify a long-term strategy for the settlement. The land East of Callow Hill Road should be suitably allocated for development so that the route of the M42 motorway acts as the limiting boundary to development in the

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northern area of Alvechurch, as recognised by the previous Local Plan's 'Areas of Development Restraint' and the now proposed allocations at Alvechurch.

1.5.6 Through each updated settlement map the BDP would provide a long-term strategic approach to the delivery of development through the identified settlement hierarchy and the necessary releases from the Green Belt. If further releases of the Green Belt are necessary in the future this can be secured through a review of the development plan in accordance with the advice of the NPPF, but after a longer time period than is currently proposed by the Council.


**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

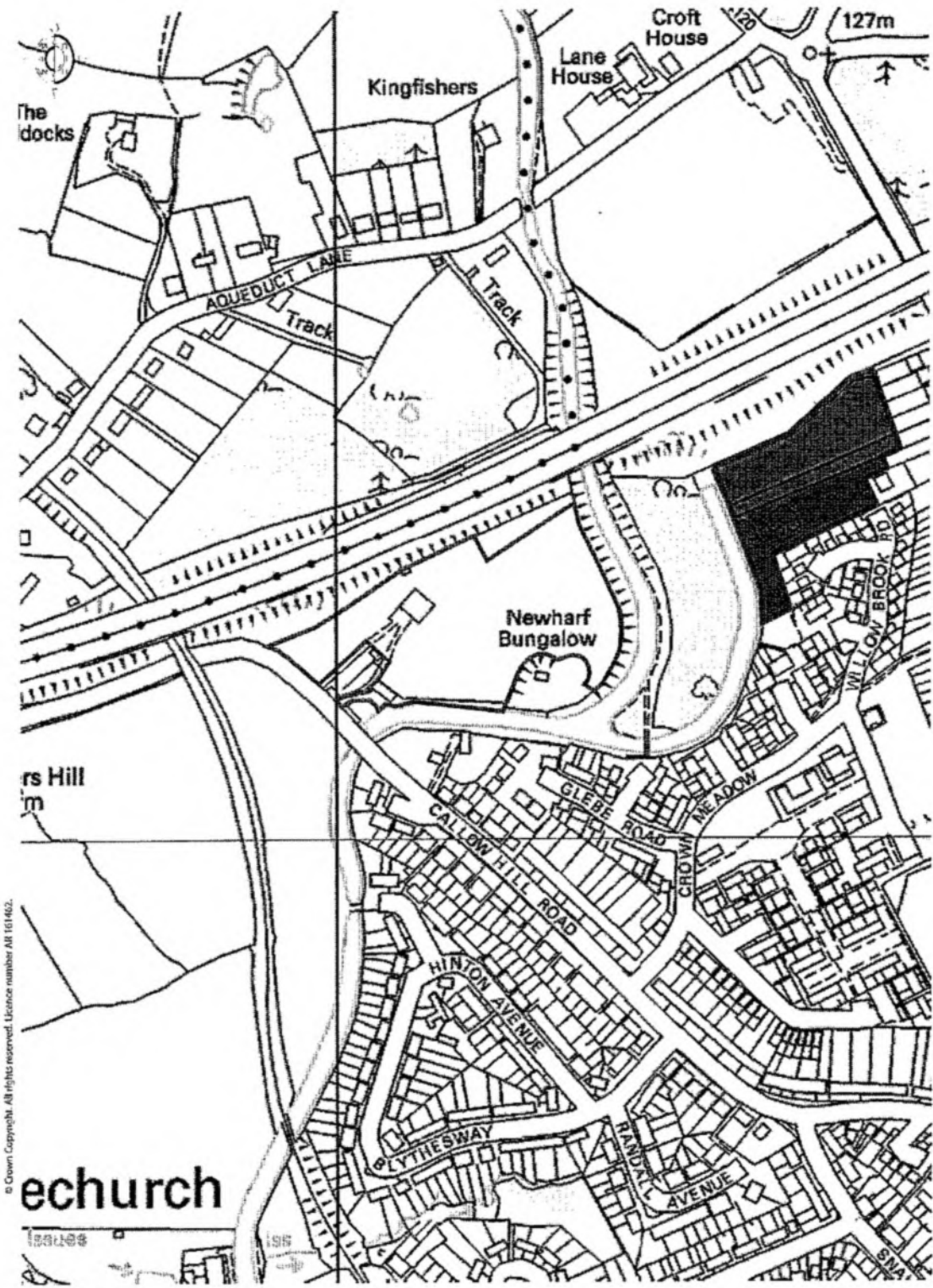
8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? **Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

No, I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

Participation at the examination is considered necessary at this stage given the importance of ensuring that the Council undertakes to provide additional housing sites to meet the needs of neighbouring authorities as well as the necessity of undertaking a Green Belt Review prior to the adoption of the BDP. Having the ability to scrutinise the Council's justification of delaying the Green Belt Review and underestimating the housing levels required at the oral examination is appropriate justification for participation.

Signature 	Date: 11/11/13
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**echurch**

SCALE: 1:5000 @ A4

- Promoted Site East of Callow Hill Road
- Proposed Residential Development Site 'West of Birmingham Road'

<p>REF: JBB8105                  CLIENT: Land Consortium                  DATE: November 2013                  STATUS: Final</p>	<p>CHECKED BY: KE                  DATE CHECKED: 11/11/13                  REVISION: 00                  PREPARED BY: JP</p>	<p><b>RPS</b>                  Highfield House, 5 Ridgeway, Quinton Business Park, Birmingham, B32 1AF                  T: 0121 213 5500 F: 0121 213 5502 W: www.rpsgroup.com</p>
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**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)

RPS Planning & Development on behalf of Messrs Wild, Johnson, McIntyre and Fisher

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

Page:	Paragraph:8.13	Policy:BDP2 – Settlement Hierarchy
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 checked="" 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)

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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. (see Note 8 para 4.3)

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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:

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

## **1.6 Green Belt Review**

1.6.1 RPS Planning & Development (RPS) is retained by Messrs Wild, Johnson, McIntyre and Fisher to present representations to the BDP and the proposed deferral of a Green Belt Review until after the BDP has been adopted.

1.6.2 There is considerable concern in regard to the repeated references to the requirement for a Green Belt Review to be undertaken to identify new development opportunities through the expansion of settlement boundaries – but that no such review has taken place to inform the production of the BDP. This is especially pertinent for Alvechurch given that two of the three Development Sites allocated at the village through the BDP have already been granted consent with the new Middle School and Library complex already built and 27 dwellings have been approved to the east of Birmingham under the planning reference 11/0672. Whilst the remaining development site to the west of Birmingham Road is currently under consideration for residential development of 25 dwellings through application 13/0026. Therefore there are no remaining development site opportunities to be brought forward within Alvechurch once the BDP is adopted. Given the situation at Alvechurch and the resulting failure of the BDP to appropriately identify sites to deliver housing and employment requirements for the plan period through a Green Belt Review the plan must be found unsound as it will not be effective in delivering a strategic approach and securing the level of development proposed.

1.6.3 The focus of Messrs Wild, Johnson, McIntyre and Fisher's concerns in relation to the proposed Settlement Hierarchy and overall development strategy, is in relation to the necessity to undertake a Green Belt Review through the BDP. Such a review is required before the adoption of the BDP to identify a robust strategic approach to the delivery of development which would allow new 'areas of development restraint' or safeguarded land sites to be identified as the next stage of land allocations and releases from the Green Belt, in order to meet the needs of the Borough and rural communities such as Alvechurch up to 2030, similar to the approach taken by the 2004 Local Plan and therefore a Green Belt review should take place before the BDP is adopted.

1.6.4 The allocation of new greenfield development sites within the identified settlement hierarchy is considered to be a robust approach to delivering development, which will result in amendments to the settlement boundaries and expansion of larger settlements such as Alvechurch to ensure that the required level of development can be accommodated. For such allocations to take place a Green Belt Review must be undertaken so that sites in addition to the 'Areas of Development restraint' identified by the 2004 Local Plan are proposed in order to ensure an adequate supply of housing development sites within the settlement hierarchy are provided.

1.6.5 However, the BDP currently proposes 7,000 dwellings through Policy BDP3 – Future Housing & Employment Growth, of which 4,600 dwellings to be delivered between the period 2011 – 2023 are outside the Green Belt and 2,400 dwellings in the period 2023 – 2030 are to be identified following a Green Belt review. The dwellings proposed within the Green Belt are recognised as being required to satisfy the Borough's housing requirement but their location and distribution are not identified in any way through the Proposed Submission Version of the BDP. RPS considers that without a Green Belt Review the surety of delivering the 2,400 dwellings within the Green Belt at the larger settlements is not guaranteed.

1.6.6 Furthermore, in the Council's document titled "5 Year Housing Land Supply in Bromsgrove"

dated 1<sup>st</sup> April 2013, the Council identifies a 5.83 year land supply of deliverable sites as required by Paragraph 47 of the NPPF. Notwithstanding the Council's justification of the windfall allowance used, little scrutiny has been given to the deliverability of consented schemes that are relied upon. Recent appeal decisions such as the Dudley Road case at Honeybourne (APP/H1840/A/12/2171339) have maintained that some level of non-delivery should be expected when determining housing land supply to provide a robust and scrutinised development scenario. In the Honeybourne case the Inspector considered that a discount of 10% was reasonable to account for delayed or non-delivery of consented sites over the five year period. RPS would maintain that this discount should also be applied to the SHLAA sites as their delivery is also dependent upon the market, overcoming typical delivery constraints as well as additional factors identified in the SHLAA such as relocation of businesses.

- 1.6.7 Therefore, the Council's calculation of housing supply should take account of such a factor and suitably discount the housing levels recorded. By adopting this level of scrutiny the 5 year housing land supply would not be reduced to below the requirement but the level of surplus currently identified would be reduced significantly. However, the Council's housing supply calculations have also not taken into account any level of undersupply from 2011 to the adoption of the plan. The resultant shortfall must be attributed within the housing supply calculations and should not simply be dealt with through the identification of commitments, especially when no target figure exists for this period of time and the 386 commitments identified do not reflect the annual level of housing delivery expected post plan adoption. Instead therefore, this period of time should be attributed the same annual rate of housing delivery, which identifies a shortfall provision of 392 dwellings. The recently published National Planning Practice Guidance website recommends this approach to dealing with historic under provision, whether limited to a few years or extended periods of time. Taken this shortfall into account with the requirement to apply a 10% delivery discount, the calculated 5 year land supply would fall short at 4.54years.
- 1.6.8 Using this up to date methodology it is evident that the identified housing land supply would provide less than the required five years supply. The only solution to identifying sufficient development opportunities and ensuring the plan will deliver the level of growth required will be to undertake a full review of the Green Belt around larger settlement and identify new 'safeguarded land' sites to ensure the areas of development can be released during the later stages of the plan and a comprehensive, long-term approach to delivering development in sustainable locations can be achieved. Accordingly the current BDP does not provide an adequate level of housing to be allocated over the whole of the plan period so fails in being effective in meeting the identified housing needs of the Borough. This is especially important given that the BDP currently accepts that 2,400 houses will need to be allocated within the Green Belt, the implications of this housing land supply review means that the level of housing to be delivered in the Green Belt is likely to increase, with no surety of there being appropriate sites and therefore delivery of the development. This is an important factor when considering the distribution of development within the settlement hierarchy and the recognised lack of capacity within existing settlement boundaries.
- 1.6.9 Currently, paragraph 8.13 identifies that it is 'desirable' for settlement boundaries to remain unchanged until a Green Belt Review is undertaken, supporting the RPS contention that the proposed strategy will not be effective in identifying sufficient development sites until a full review of the green belt is undertaken. The larger settlement of Alvechurch can be used to demonstrate the ineffectiveness of the proposed BDP in securing housing development, whereby the allocated development sites have already been granted consent for development before the BDP is adopted and therefore there are no other opportunities for development at Alvechurch until a Green Belt review is undertaken or the BDP reviewed. Currently Alvechurch has no available development opportunities within its settlement boundary and

therefore any additional residential need cannot be met at this settlement, despite its suitability and capacity to accommodate growth. The Council's SHLAA report is demonstration of this and acceptance that to accommodate development over and above that granted consent, its settlement boundaries will have to be modified through a Green Belt Review. As a larger settlement Alvechurch is not able to accommodate 100% affordable or 'exception' schemes within the Green Belt and must rely upon the development of its allocated sites to provide affordable homes. However, as the sites allocated at the settlement will have already been granted consent before the BDP is adopted, this does not leave any other opportunity to deliver affordable homes for the parish or cross-boundary needs of Birmingham within the plan period or until a Green Belt Review can be undertaken.

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1.6.10 The proposed deferment of the review of the Green Belt until later in the Plan period is entirely inconsistent with the approach advised by the NPPF, specifically NPPF paragraph 157 which advises that Local Plans should *'allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate'*. Furthermore, the preparation of a Local Plan is the most appropriate time to review the Green Belt as Green Belt boundaries are intended to have permanence in the long term in order to endure beyond the Plan period (NPPF Paragraphs 83 and 84). The proposed submission version of the BDP fails to do this and therefore fails in identifying a development strategy in accordance with the principles of national guidance and will be ineffective in delivering the required quantum of development opportunities.

1.6.11 In conclusion the Bromsgrove District Plan is unsound because of its deferment of the Green Belt review, which is inconsistent with the NPPF and fails to ensure that the proposed settlement hierarchy and development site approach will deliver the required level of housing over the plan period. The only way to make the BDP compliant is for the Council to undertake a Green Belt review as part of the evidence base so that appropriate settlement boundaries can be altered in accordance with the proposed settlement hierarchy prior to submission of the Plan for examination. The intention of Bromsgrove Council to commence an immediate review of the Green Belt as soon as the BDP is adopted is demonstration of the necessity of the study to be undertaken in order to deliver the strategy approach proposed.

## 1.7 Soundness

1.7.1 The BDP is unsound as the current approach to site allocations within the proposed settlement hierarchy fails to identify a long term strategic approach to development across the Borough, that will be ineffective in delivering the necessary quantum of development sites and sustain the 5 year housing land supply over the plan period. The BDP and does not correspond with national policy contained in the NPPF that requires Green Belt reviews to be undertaken to inform any strategic approach proposed through a development plan (NPPF paragraph 83 - 84).

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)**

## 1.8 Necessary Changes

1.8.1 The Bromsgrove District Plan is unsound because of its deferment of the Green Belt review,



which is inconsistent with the NPPF and fails to ensure that the proposed settlement hierarchy and development site approach will deliver the required level of housing over the plan period. The only way to make the BDP compliant is for the Council to undertake a Green Belt review as part of the evidence base so that appropriate settlement boundaries can be altered in accordance with the proposed settlement hierarchy prior to submission of the Plan for examination.

- 1.8.2 Through such a Green Belt Review new development sites can be identified to act as safeguarded land development opportunities toward the later period of the plan as well as appropriately review the settlement boundaries of all applicable settlements to fulfil the strategic function of the development plan. For example, there would be opportunity for the settlement boundary of Alvechurch to be examined and appropriate areas released from Green Belt allocation for immediate and future development through the identification of development sites and safeguarded land, as advised by NPPF paragraph 58.
- 1.8.3 The Bromsgrove District Plan is also based upon an incorrect calculation of the housing supply due to its failure to take into account the historic shortfall and provision and the necessity to apply a discount to take into account development failures or delays to delivery. Appropriate changes to the level of housing supply should be made and, as a result, the level of initial housing delivery will need to be increased, which will mean that the delay in undertaking a Green Belt review will have serious implications in respect of the identification of sufficient development sites and proposal of allocations through the plan. This approach would be inconsistent with the NPPF and fails to ensure that the proposed development strategy will deliver the required level of housing over the plan period. The only way to make the BDP compliant is for the Council to review their housing supply calculations and apply a rate for the under-provision of planning consents as well as additional provision for meeting the shortfall of housing since 2011 when the plan is intended to start from whilst undertaking a full Green Belt Review as part of the evidence base for the submission version instead of delaying this process until after the plan is adopted.
- 1.8.4 In terms of future safeguarded land sites for Alvechurch the land west of Callow Hill Lane is an example of the existence of a suitable site that has little or no Green Belt function due to its relationship to the raised section of the M42 motorway. The allocation of this site as an additional development site of future safeguarded land would contribute toward the longer-term development needs of Alvechurch that could be timetabled for delivery much later in the plan period or beyond. Its location must also be considered to be acceptable given its relationship to the currently proposed site west of Birmingham Road, and the fact that the M42 raised carriageway will act as a prominent and permanent northern edge to the settlement's limits.
- 1.8.5 Paragraph 8.13 should then be amended to refer to the results of the Green Belt Review as informing the plan's evidence base and introduce the concept of 'safeguarded land' site at larger settlements. Such sites would propose the removal of site from the Green belt toward the later years of the plan or as part of a longer term strategy, such as providing for cross boundary development requirements. As a result, the settlement maps included within the BDP would be suitably amended to identify a long term strategy for each settlement, including the necessary releases from the Green Belt.


8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? **Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

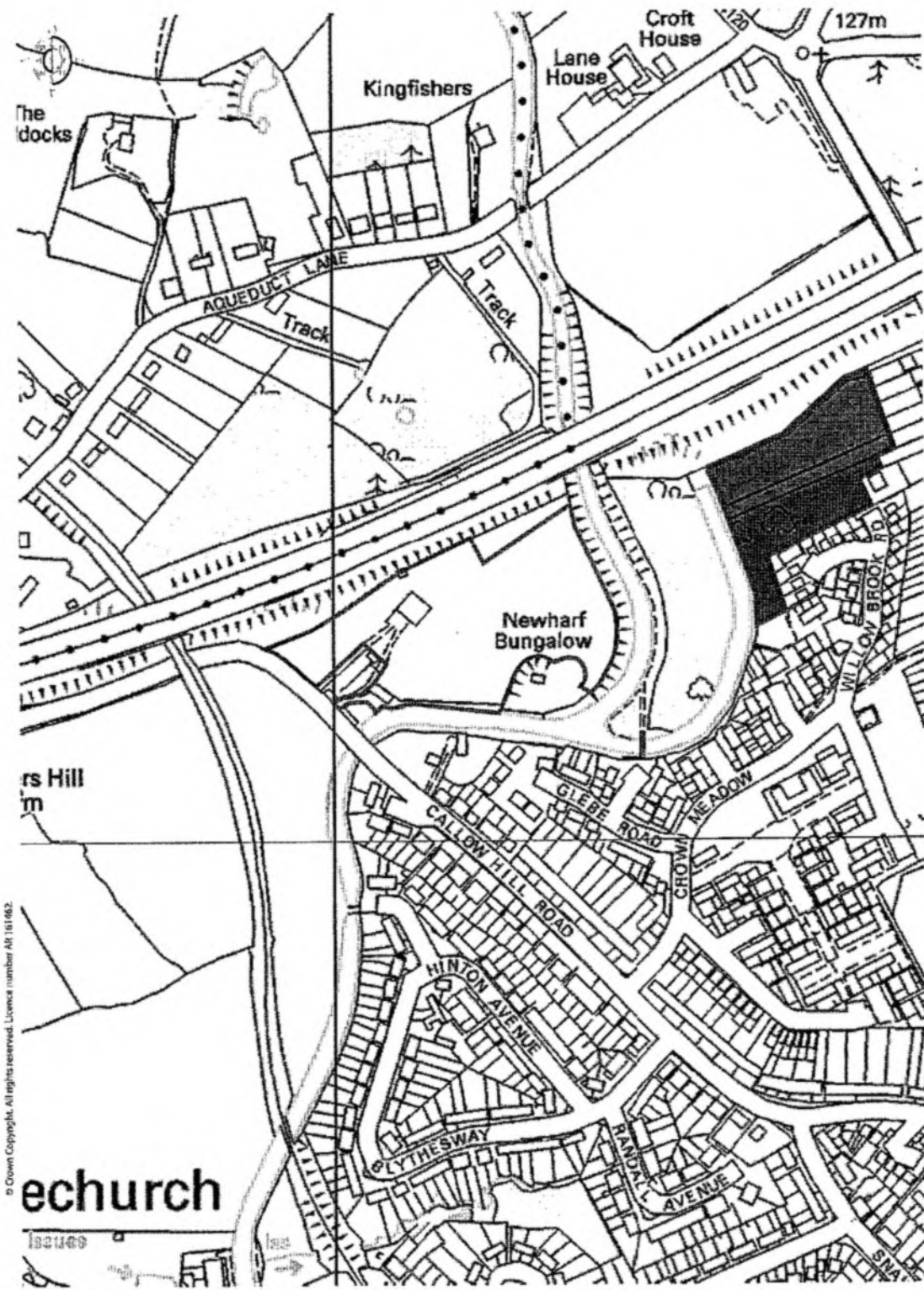


No, I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

Participation at the examination is considered necessary at this stage given the importance of ensuring that the Council undertakes to provide additional housing sites to meet the needs of neighbouring authorities as well as the necessity of undertaking a Green Belt Review prior to the adoption of the BDP. Having the ability to scrutinise the Council's justification of delaying the Green Belt Review and underestimating the housing levels required at the oral examination is appropriate justification for participation.

Signature  Date: 11/11/13




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**echurch**

SCALE: 1:5000 @ A4

- Promoted Site East of Callow Hill Road
- Proposed Residential Development Site 'West of Birmingham Road'

REF: JB88105	CHECKED BY: KE	 Highfield House, 5 Ridgeway, Quinton Business Park, Birmingham, B32 1AF T: 0121 213 5500 F: 0121 213 5502 W: www.rpsgroup.com
CLIENT: Land Consortium	DATE CHECKED: 11/11/13	
DATE: November 2013	REVISION: 00	
STATUS: Final	PREPARED BY: JP	

**Part B**

Please use a separate Part B form for each representation you wish to make

Name or Organisation (see Note 8 para 4.1)

RPS Planning & Development on behalf of Messrs Wild, Johnson, McIntyre and Fisher

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

Page:	Paragraph:	Policy:BDP4 – Green Belt
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 checked="" 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)

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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. (see Note 8 para 4.3)

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

consistently throughout the plan and not just an initial spike in house building as the BDP is adopted. To ensure this, the introduction of safeguarded land sites could be identified as recommended by the NPPF, which could identify an approach to Green Belt release beyond the plan period as well as identifying possible releases toward the end of the plan when all other development sites at a settlement have been realised. This approach would be consistent with the advice of the NPPF in terms of supporting sustainable development and would help the BDP to adopt a positively prepared approach.

1.12.3 The Bromsgrove District Plan is also based upon an incorrect calculation of the housing supply due to its failure to take into account the historic shortfall and provision and the necessity to apply a discount to take into account development failures or delays to delivery. Appropriate changes to the level of housing supply should be made and, as a result, the level of initial housing delivery will need to be increased, which will mean that the delay in undertaking a Green Belt review will have serious implications in respect of the identification of sufficient development sites and proposal of allocations through the plan. This approach is inconsistent with the NPPF and fails to ensure that the proposed development strategy will deliver the required level of housing over the plan period. The only way to make the BDP compliant is for the Council to review their housing supply calculations and apply a rate for the under-provision of planning consents as well as additional provision for meeting the shortfall of housing since 2011 when the plan is intended to start from whilst undertaking a full Green Belt Review as part of the evidence base for the submission version instead of delaying this process until after the plan is adopted.

1.12.4 In terms of additional development it is apparent that the scale of housing to be delivered through the BDP needs to increase and as the BDP already recognises that 2,400 houses will need to be allocated in the Green Belt, RPS considers that the level of development to be proposed in the Green Belt will increase significantly above this level. As such the requirement for a full review of the Green Belt and the available capacity of larger settlements to expand is required to inform the strategic approach of allocations.

1.12.5 In terms of additional development and future safeguarded land sites for Alvechurch, the land east of Callow Hill Lane is an example of the existence of a suitable site that has little or no Green Belt function due to its relationship to the raised section of the M42 motorway. As identified by the attached plan the location of this promoted site is closely related to the existing proposed development sites at Alvechurch, especially the proposed housing allocation 'west of Birmingham Road'. The allocation of the promoted East of Callow Hill Road site could contribute toward the longer-term development needs of Alvechurch that could be timetabled for delivery much later in the plan period or beyond. The appropriate time to consider the potential of sites such as the land east of Callow Hill Lane to contribute toward housing targets, is during a Green Belt review that the Council has failed to undertake for the BDP to be sound.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? **Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

No, I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>



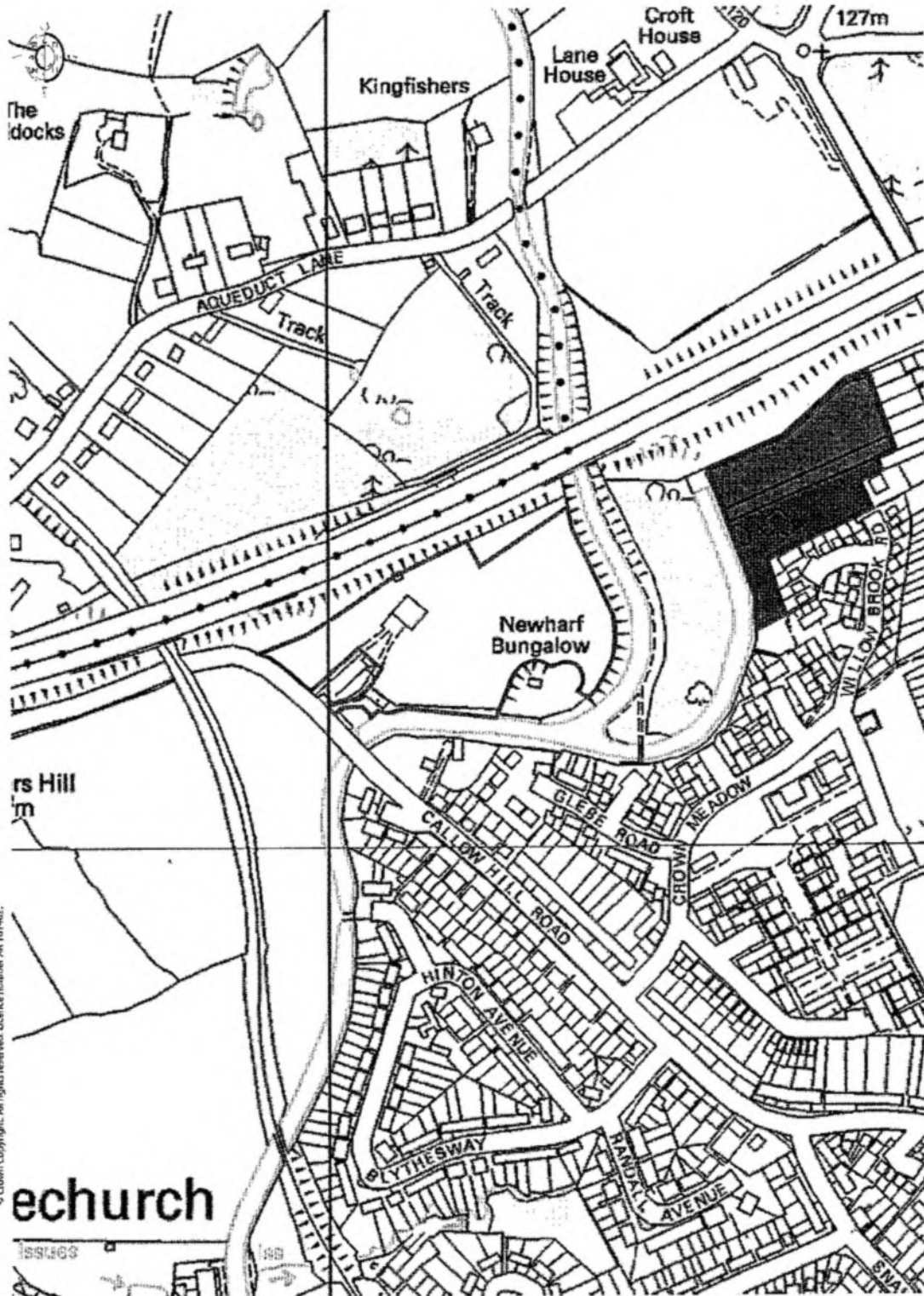
9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

Participation at the examination is considered necessary at this stage given the importance of ensuring that the Council undertakes to provide additional housing sites to meet the needs of neighbouring authorities as well as the necessity of undertaking a Green Belt Review prior to the adoption of the BDP. Having the ability to scrutinise the Council's justification of delaying the Green Belt Review and underestimating the housing levels required at the oral examination is appropriate justification for participation.

Signature



Date: 11/11/13



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SCALE: 1:5000 @ A4

- Promoted Site East of Callow Hill Road
- Proposed Residential Development Site 'West of Birmingham Road'

<p>REF: JBB8105                  CLIENT: Land Consortium                  DATE: November 2013                  STATUS: Final</p>	<p>CHECKED BY: KE                  DATE CHECKED: 11/11/13                  REVISION: 00                  PREPARED BY: JP</p>	<p><b>RPS</b>                  Highfield House, 5 Ridgeway, Quinton Business Park, Birmingham, B32 1AF                  T: 0121 213 5500 F: 0121 213 5502 W: www.rpsgroup.com</p>
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**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)

RPS Planning & Development on behalf of Messrs Wild, Johnson, McIntyre and Fisher

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

Page:	Paragraph:	Policy:BDP3 – Future Housing
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 checked="" 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)

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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. (see Note 8 para 4.3)

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

#### **1.16 Future Housing Requirements**

1.16.1 RPS Planning & Development (RPS) is retained by Messrs Wild, Johnson, McIntyre and Fisher to present representations to the BDP in relation to the level of future housing proposed through the plan.

1.16.2 The Bromsgrove District Plan 2011 - 2030 proposes 7,000 dwellings in Policy BDP3 – Future Housing & Employment Growth, of which 4,600 dwellings to be delivered between the period 2011 – 2023 are outside the Green Belt and 2,400 dwellings in the period 2023 – 2030 are to be identified following a Green Belt review. The dwellings proposed within the Green Belt are recognised as being required to satisfy the Borough's housing requirement but their location and distribution are not identified in any way through the Proposed Submission Version of the BDP.

1.16.3 In the document titled "5 Year Housing Land Supply in Bromsgrove" dated 1<sup>st</sup> April 2013, the Council identifies a 5.83 year land supply of deliverable sites as required by Paragraph 47 of the NPPF. Notwithstanding the Council's justification of the windfall allowance used, little scrutiny has been given to the deliverability of consented schemes that are relied upon. Recent appeal decisions such as the Dudley Road case at Honeybourne (APP/H1840/A/12/2171339) have maintained that some level of non-delivery should be expected when determining housing land supply to provide a robust and scrutinised development scenario. In the Honeybourne case the Inspector considered that a discount of 10% was reasonable to account for delayed or non-delivery of consented sites over the five year period. RPS would maintain that this discount should also be applied to the SHLAA sites as their delivery is also dependent upon the market, overcoming typical delivery constraints as well as additional factors identified in the SHLAA such as relocation of businesses.

1.16.4 Therefore, the Council's calculation of housing supply should take account of such a factor and suitably discount the housing levels recorded. By adopting this level of scrutiny the 5 year housing land supply would not be reduced to below the requirement but the level of surplus currently identified would be reduced significantly. In addition, the Council's housing supply calculations have not taken into account any level of undersupply from 2011 to the adoption of the plan. The resultant shortfall must be attributed within the housing supply calculations and should not simply be dealt with through the identification of commitments, especially when no target figure exists for this period of time and the 386 commitments identified do not reflect the annual level of housing delivery expected post plan adoption. Instead therefore, this period of time should be attributed the same annual rate of housing delivery, which identifies a shortfall provision of 392 dwellings. The recently published National Planning Practice Guidance website recommends this approach to dealing with historic under provision, whether limited to a few years or extended periods of time. Taken this shortfall into account with the requirement to apply a 10% delivery discount, the calculated 5 year land supply would fall short at 4.54 years.

1.16.5 Using the most up to date methodology it is evident that the identified housing land supply would provide less than the required five years supply. The only solution to identifying sufficient development opportunities and ensuring the plan will deliver the level of growth required will be to undertake a full review of the Green Belt around larger settlement and identify new 'safeguarded land' sites to ensure the areas of development can be released during the later stages of the plan and a comprehensive, long-term approach to delivering development in sustainable locations can be achieved. Accordingly the Plan does not provide



an adequate level of housing to be allocated over the whole of the plan period and fails to be effective in meeting the identified housing needs of the Borough.

### 1.17 Soundness

1.17.1 The BDP is unsound as the current approach to calculating the proposed level of housing supply is not based upon the most up to date methodology and does not take into account sufficient scrutiny as advised by national planning guidance. Without the inclusion of such scrutiny the resulting plan will be unsound in delivering a suitable level of housing supply and as a result will be ineffective. The BDP does not correspond with national policy contained in the NPPF that requires a 5 year housing land supply to be maintained and that Green Belt reviews should be undertaken to inform any strategic approach proposed through a development plan (NPPF paragraph 83 - 84).

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)

### 1.18 Necessary Changes

1.18.1 The Bromsgrove District Plan is unsound because of its incorrect calculation of the housing supply due to its failure to take into account the historic shortfall and provision and the necessity to apply a discount to take into account development failures or delays to delivery. Appropriate changes to the level of housing supply should be made and, as a result, the level of initial housing delivery will need to be increased, which will mean that the delay in undertaking a Green Belt review will have serious implications in respect of the identification of sufficient development sites and proposal of allocations through the plan. This approach would be inconsistent with the NPPF and fails to ensure that the proposed development strategy will deliver the required level of housing over the plan period. The only way to make the BDP compliant is for the Council to review their housing supply calculations and apply a rate for the under-provision of planning consents as well as additional provision for meeting the shortfall of housing since 2011 when the plan is intended to start from whilst undertaking a full Green Belt Review as part of the evidence base for the submission version instead of delaying this process until after the plan is adopted.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

Participation at the examination is considered necessary at this stage given the importance of ensuring that the Council undertakes to provide additional housing sites to meet the needs of neighbouring authorities as well as the necessity of undertaking a Green Belt Review prior to the adoption of the BDP. Having the ability to scrutinise the Council's justification of delaying the Green Belt Review and underestimating the housing levels required at the oral examination is appropriate justification for participation.

Signature:



Date: 11/11/13

**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)

RPS Planning &amp; Development on behalf of Messrs Wild, Johnson, McIntyre and Fisher

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

Page:	Paragraph:8.25	Policy:BDP3 – Future Housing
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 checked="" 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)

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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. (see Note 8 para 4.3)

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

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments.

### **1.13 Cross Boundary Provision**

1.13.1 RPS Planning & Development (RPS) is retained by Messrs Wild, Johnson, McIntyre and Fisher to present representations to the BDP in relation to the level of future housing proposed through the plan.

1.13.2 The Bromsgrove District Plan 2011 - 2030 proposes 7,000 dwellings in Policy BDP3 – Future Housing & Employment Growth, of which 4,600 dwellings to be delivered between the period 2011 – 2023 are outside the Green Belt and 2,400 dwellings in the period 2023 – 2030 are to be identified following a Green Belt review. In addition 3,400 dwellings are proposed by the BDP to provide for some of the housing need in Redditch, as set out by Policy RCBD1 – Redditch Cross Boundary Development.

1.13.3 However, it is evident that the BDP does not consider any other cross-boundary requirements, which is especially relevant when considering the relationship to and the housing needs of Birmingham City Council (BCC). Indeed BCC's assessed need for housing has identified a requirement of up to 105,000 dwellings as being required by 2031, although only 43,000 dwellings can be accommodated within the city area. Therefore BCC is dependent upon the NPPF's cross-boundary provision requirement and will be reliant upon the neighbouring authorities of Coventry City, Lichfield DC, Solihull MBC, Kidderminster DC and Bromsgrove DC to accommodate the excess. Currently the BDP as prepared references this issue but does not provide for any cross-boundary delivery for Birmingham.

1.13.4 RPS believes that the failure for the BDP to make any cross-boundary provision for Birmingham is linked to the delay of the Green Belt Review, which would be necessary to release further sites for development in the areas that could contribute toward BCC's need, such as Alvechurch.

### **1.14 Soundness**

1.14.1 As such, RPS believes that the BDP is unsound as the current version applies no level of cross-boundary provision for BCC despite acknowledgements that it is an issue. The cross-boundary provision of housing can only be dealt with through strategic development plan such as the BDP and the failure to address this issue at the current stage renders the submitted plan as ineffective in identifying the development requirements to be delivered, contrary to the advice of the NPPF [paragraphs 181 – 182] and will therefore be unable to propose a positive approach to development delivery.

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)**

### **1.15 Necessary Changes**

1.15.1 The Bromsgrove District Plan is unsound because it fails to appropriately take into account the requirements of cross-boundary provision of housing, particularly in respect of BCC's identified housing shortfall. To provide a robust strategic approach through the BDP the needs of neighbouring authorities must be taken into account when identifying the level of

new housing to be delivered and considering the location of new housing sites. Accordingly the needs of other authorities in addition to Redditch BC must be considered and to inform the resulting housing need analysis and additional site allocation a full Green Belt review must be undertaken prior to the adoption of the BDP.


1.15.2 In terms of the identification of new sites to meet some of BCC's housing shortfall, the larger settlement of Alvechurch has site opportunities that could contribute toward meeting this housing need, such as land off Callow Hill Road as shown on the attached plan. Such sites should either be specifically identified as meeting BCC's housing needs or recognised as safeguarded land sites that could be removed from the Green Belt to satisfy the cross-boundary housing need as and when required.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? **Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.**

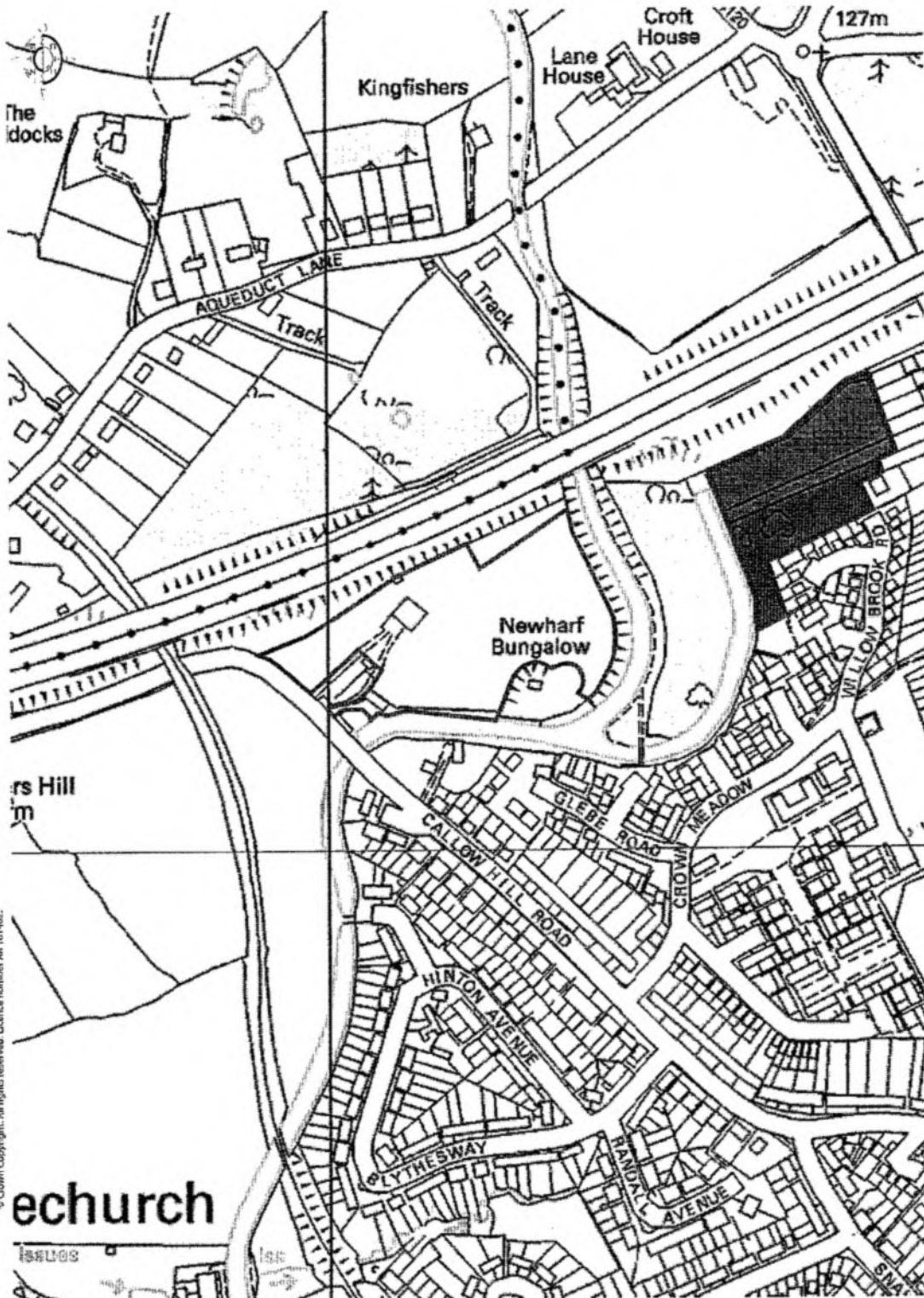
No, I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

Participation at the examination is considered necessary at this stage given the importance of ensuring that the Council undertakes to provide additional housing sites to meet the needs of neighbouring authorities as well as the necessity of undertaking a Green Belt Review prior to the adoption of the BDP. Having the ability to scrutinise the Council's justification of delaying the Green Belt Review and underestimating the housing levels required at the oral examination is appropriate justification for participation.

Signature:  Date: 11/11/13






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**Church**

SCALE: 1:5000 @ A4

- Promoted Site East of Callow Hill Road
- Proposed Residential Development Site 'West of Birmingham Road'

REF: JBB8105 CLIENT: Land Consortium DATE: November 2013 STATUS: Final	CHECKED BY: KE DATE CHECKED: 11/11/13 REVISION: 00 PREPARED BY: JP	 Highfield House, 5 Ridgeway, Quinton Business Park, Birmingham, B32 1AF T: 0121 213 5500 F: 0121 213 5502 W: www.rpsgroup.com
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