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BROMSGROVE LOCAL PLAN PROPOSED SUBMISSION VERSION

BACKGROUND STATEMENT TAYLOR TRUSTEES

2011-2030

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RTPI
mediation of space - making of place



1. BACKGROUND

- 1.1. In April 2011 we produced representations on the Bromsgrove District Council LDF Draft Core Strategy 2 Policies and we have attached a copy of that document to the present representations.
- 1.2. That is an important background document referring firstly to our Clients strategically located parcel of land at the Maypole, Birmingham fronting the A435 Hollywood by-pass and Alcester Road South, to its site area of 25.4 hectares (approximately 63 acres), the present activities on the land and the fact that it is so strategically placed, directly on the edge of Birmingham adjoining a District shopping centre and at the end of the most actively used bus route in Europe.
- 1.3. Quite properly that statement indicates that the Trustees have been working, with the planning authorities, and principally with the City of Birmingham, over the last 30 years to seek the release of the land for business use in the form of a business park.
- 1.4. Given the Trustees history, you will see from that statement that they wished to provide a business park for "green engineering industries involved in high technology and innovative production" as a science and research park for "follow-on accommodation". The establishment of this business park, including science and research, would be carried out in consultation and involvement with the Universities of Birmingham and Aston, as well as the University of Warwick but with a direct link to the University of Aston's Science Park. This was to make sure that provision on this land was complementary to all that those Universities were providing but as a facility for the next stage of development of those embryo businesses.
- 1.5. It was not necessarily expected that the science and research park would occupy all of the landholding. The residue of the land was expected to have buildings related to a normal business park. In addition there would be surrounding landscaping.
- 1.6. Since the submission of that document in 2011 we have had further discussions with the City of Birmingham and their planning team, involved in South Birmingham with their link to the City's Forward Planning team currently producing the submission draft of the City's Local Plan. We are aware that the City have been looking to provide further housing and employment provision on their southern boundary but also looking beyond that boundary into Bromsgrove because of the cross boundary links required now through Development Plan guidance and also through the Duty To Co-Operate with adjoining authorities.
- 1.7. The only matter that has changed is the City's consideration for the provision of additional housing on and over the City's administrative boundary in Bromsgrove to provide housing. As such, there is sufficient land within the Taylor Trustees landholding at the Maypole to provide an element of housing by doing so a mixed development on that landholding.
- 1.8. It is clear from the City's report to the most recent Cabinet on the emerging Development Plan, prior to submission, that their proposal for a small Park and Ride facility on our Clients Maypole land is still live and one that they would still wish to pursue. A previous Planning Appeal by the City for that use on our Clients subject land was dismissed in the 1990s simply because the City had not carried out a thorough study of alternative sites within the southern part of the City boundary for such a use. In our view our Clients landholding is the most obvious parcel of land, apart from the fact that it is directly at the end of the bus route linking the City centre and within relatively easy distance of a local railway station connecting to New Street station in Birmingham.

- 1.9. Therefore, in summary, we have sought to release this parcel of land for important employment and related uses, principally to assist the City in proper and reasonable employment provision albeit that it is on the boundary between the two local authorities. Not unnaturally there will be course be some benefits for employment provision within Bromsgrove and a real benefit in reducing commuting where appropriate.
- 1.10. It is therefore with very considerable disappointment that we have to record that BDC have not taken into account previous submissions or the long history of consultations and representations on Development Plans to seek the release of this parcel of land for all the economic and related benefits that would ensue.
- 1.11. We must record our disappointment that our Clients have not been directly consulted by BDC on their proposals relative to the preparation of the Employment Land Review either in 2008 or 2012 and therefore not had any input into their future proposals. In our view this is a grave failing in the Bromsgrove Local Plan for failing again to take this proposal seriously. We doubt that there were any consultations with the LEP over the benefits of releasing this parcel of land for BDC and particularly in consultation with the City of Birmingham.
- 1.12. Whilst on its own this substantial failure might not be sufficient for the present Bromsgrove Local Plan to be declared unsound and not properly prepared, we suspect that there are other businesses and proposals within the Bromsgrove District that have not been properly consulted or their proposals not fully taken into account in the present Local Plan submission.
- 1.13. We must therefore we would say that the present Local Plan has not been positively prepared through objective assessment or in the light of achieving sustainability and neither is the Plan effective because it will not be delivering appropriate employment in the right location and further that there have not been and recorded effective joint working on cross boundary strategic priorities such as employment benefit of both the City of Birmingham principally but also Bromsgrove District Council.



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BROMSGROVE LOCAL PLAN PROPOSED SUBMISSION VERSION

BACKGROUND STATEMENT EMPLOYMENT AND EMPLOYMENT LAND PROVISION

2011-2030

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mediation of space - making of place



1. BACKGROUND

- 1.1. The focus of attention is really contained in paragraph 8.19 with the statement by Bromsgrove District Council (BDC) of "... *In determining the potential housing requirement for the District, a range of scenarios were tested with the most realistic being migration-led and employment-constrained scenarios which identified a net dwelling requirement ... 6,780 respectively.*" "... *On this basis a housing target of 7,000 was proposed for the 19 year Plan period.*"
- 1.2. This shows BDC adopting a very restricted and constrained proposal, effectively housing-led, but with significant effect upon a restricted employment land provision.
- 1.3. The Vision for BDC in Chapter 4 gives no indication of any growth proposal for employment other than a reference in paragraph 4.6 that BDC hope that in the next 15 to 20 years they will achieve a more balanced housing market but again, that has no reference back to balancing out employment growth with housing provision. From the Vision one concludes that BDC are adopting a "status quo" scenario.
- 1.4. Paragraph 8.24 records an Employment Land Review completed in June 2009 and then updated in 2012. That records a minimum requirement forecast for employment land of 19.9 hectares for the period 2010 to 2030. This was the absolute minimum and BDC decided that they would adopt 28 hectares effectively only being 8 additional hectares for the 20 year Plan period.
- 1.5. This approach by BDC of a minimal increase in employment land provision is based upon a report originally from 2009, a very low point in the economic cycle and updated in 2012 before there were any realistic signs of a change in the economic cycle or any indication of an upturn.
- 1.6. Firstly the Employment Land Review, its findings, and more particularly BDC's reliance upon it is fatally flawed. There has been no proper economic or housing modeling for the whole of the Plan period. There is no consistency of approach with the South Worcestershire Development Plan and its authorities who have adopted an economic recovery-led approach. In effect this shows BDC in its role as an "ostrich burying its head in the sand" not wanting to acknowledge that it needs to carry out proper up to date surveys, consistent with the present economic recovery forecasts and to model those for an important District on the edge of a major conurbation.
- 1.7. Secondly, it does not appear that the authority has properly and reasonably canvassed the existing businesses in its District to ascertain at this point in time, ie 2013, what their economic prospects are, what future development and land requirements they need and the overall impact that such growth might have on the District as a whole.
- 1.8. The provision of 28 hectares of land over a 20 year period gives a little less than 1.5 hectares per year which is substantially out of kilter with the existing population, the proposed restricted increase in housing, and thereby population, in the Plan period and does not acknowledge the economic position of the District and its existing relationship with the conurbation.
- 1.9. Whilst there is reference in the opening pages of the Plan, page 4, to the Local Enterprise Partnership there is nothing in the proposed Submission Version to any joint working between them or to any background reports or studies that would inform the economic base or the economic future for BDC for the Plan period. We know that the LEP has consulted numerous businesses. These businesses have assisted the LEP in having a better understanding of the employment needs of the BDC District and we had assumed that that business information had been fed through to the Local Plan in setting

an appropriate strategy based upon their requirements. Without properly accommodating future requirements you are in effect likely to sterilize proper economic growth where it is required in this Plan period. In our view these future proposals are considerable over the Plan period and the consequential employment generation is significant for the District.

- 1.10. There therefore is yet another major failing with the BDC Plan in not properly accommodating the existing businesses and their potential growth. In addition there seems to be no statistical base underpinning the provision of the future 28 hectares of employment growth. However in reading the document some of this intended growth, ie that shown on Map 8 entitled Ravensbank Expansion Site, sits as you can see directly adjoining Redditch so that its catchment area and benefits of that land sit far more appropriately with Redditch BC (RBC) than it does for Bromsgrove and to some extent the Redditch overspill proposals for housing are effectively, in part, balanced out by the 10.3 hectares of future employment land. As such therefore, realistically the majority or all of the 10.3 hectares ought to be deducted from the BDC future allocation of 28 hectares.
- 1.11. On this basis BDC are simply providing the absolute minimum future employment provision that they have identified. Whilst there appears to be a very small element of future employment at Hagley identified on Map 5, there is nothing else in the Plan that gives any other indication of where the 16 to 18 hectares might be found in the District. There is no Strategic employment provision identified.
- 1.12. One has to conclude from this very initial review of the BDC Plan that the District have not made proper provision for employment for their District for the future. This is most particularly based upon an outdated review, not taking into account the 2013 economic changes and government-initiated advice on economic prospects, not reflecting on their important location adjoining the conurbation and not properly linking in properly constituted joint studies with the Local Enterprise Partnership, its review of the District's employment and the proper future requirements of those employers and businesses for what is a most important Plan period for the next 20 years where there is now a known rise in economic prospects, business growth, employment growth and a requirement to take into account the in-migration of new businesses based principally upon the excellent motorway network and the strategic position of Bromsgrove in the West Midlands conurbation.
- 1.13. In our view the Plan as submitted cannot possibly meet the objectively assessed development and infrastructure requirements because the authority have not undertaken a rigorous and proper objective assessment. In addition BDC have not positively and properly prepared their Plan because it is not consistent with achieving proper and reasonable sustainable development to meet the long-term needs of the District and its inhabitants.
- 1.14. In terms of justification the Plan cannot possibly be said to be founded on a robust and credible evidence base and even their outdated base has causes for concern. There is no proper economic modeling and neither is there any proper housing and population modeling. South Worcestershire had modeling for both of these albeit that they were found to be gravely wanting by the Inspector in his Initial Recommendations. Most importantly we see very little proper reasoned approach by BDC to formulating the most appropriate strategy from a series of alternatives. Where are the alternatives? Where is the justification for choice from these?
- 1.15. In terms of effectiveness, there is no reasoned justification for "deliverability of the Plan" but of course because BDC have adopted a minimalist and "ostrich-like" approach they

are bound to deliver this strategy by default but that does nothing to underpin a proper and reasonable economic future for the District as a whole.

- 1.16. From discussions at the Solihull, Lichfield and South Worcestershire Local Plan Hearings the Duty To Co-Operate goes hand-in-hand with the need for effective joint working across boundaries to identify strategic priorities for those concerned. We raise at this time substantial doubts on both counts of failing the Duty To Co-Operate but also failing to work on cross boundary issues. BDC should be asked to provide proper statements clearly identifying where they have started to co-operate and with whom, and when they started the cross boundary working, particularly in the case of the City of Birmingham and its requirement for very substantial housing provision outside its boundary.
- 1.17. We reserve the right to submit an additional Employment Review Statement following further detailed analysis of the background documents by our consultants.



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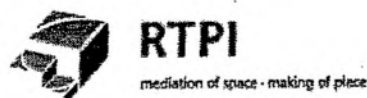
BROMSGROVE LOCAL PLAN PROPOSED SUBMISSION VERSION

BACKGROUND STATEMENT HOUSING AND HOUSING LAND PROVISION

2011-2030

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1. BACKGROUND

- 1.1. On behalf of our Clients, the Taylor Trustees, we submit this Housing Statement in respect of their landholding referred to as BDC228 in the Bromsgrove SHLAA, being Land fronting the A435 Hollywood by-pass, Druids Lane and Crabmill Lane, Maypole, Birmingham. In addition this Statement will refer in part to the Taylor Trustees larger parcel of land fronting the A435 Hollywood by-pass and Alcester Road, Maypole, Birmingham., Maypole, Birmingham.
- 1.2. The focus of attention is really contained in paragraph 8.19 with the statement by Bromsgrove District Council (BDC) of "... *In determining the potential housing requirement for the District, a range of scenarios were tested with the most realistic being migration-led and employment-constrained scenarios which identified a net dwelling requirement ... 6,780 respectively.*" "... *On this basis a housing target of 7,000 was proposed for the 19 year Plan period.*"
- 1.3. This shows BDC adopting a very restricted and constrained proposal, effectively housing-led.
- 1.4. It is noted in paragraph 8.20 that BDC must maintain a 5-year supply of housing land and that they will "initially" seek to maintain a buffer of 5% in addition to the 5-year land supply. Subsequent paragraphs under Policy BDP3: Future Housing and Employment Growth sets out a breakdown of the housing target as in paragraph 8.22. However it is noted in the Plan that some 2,400 homes remain to be identified, to be delivered within the Plan period in order to meet the housing target of 7,000 homes by 2030. It is clear that BDC can only achieve their full housing target by a release of Green Belt land through a full Green Belt review which is alluded to in the Plan as being between 2023 and 2030.
- 1.5. We note from Chapter 4 of the Plan where it explains the Vision of BDC that it wishes effectively to continue the "status quo" of the District during the Plan period. There is no reference to new growth initiatives but there is reference in paragraph 4.6 that BDC "... *will have achieved more balanced housing market and be continuing to deliver the required level of housing growth to meet local needs ...*" in the next 15 to 20 years.
- 1.6. What is clear from the Plan is that there appears to have been no modeling undertaken through proper alternative scenarios of the District for the Plan period. Certainly it is not recorded and this is unlike the South Worcestershire Development Plan. In effect this is a protectionist Local Plan reflecting more on the need to protect the Green Belt rather than properly reflect the proper employment needs of the District through the existing businesses and the need to attract new businesses or properly addressing the very substantial need for housing accommodation for the Elderly as shown through the demographics for the District over the next 20 years. These demographics show a very considerable rise in the need for specialist and non-specialist residential accommodation for the Elderly and provision must be made in the Development Plan policies to accommodate this.
- 1.7. The Inspector's Preliminary Findings in the South Worcestershire Development Plan are particularly important in the context of the Bromsgrove Local Plan, in requiring those authorities to look again at the basic provision for housing, taking into account proper and reasonable modeling for a robust strategy that is appropriate for that area. Whilst BDC have taken a very simplistic view for their housing need, ie their 7,000 dwellings, the underpinning basis for their reasoning in achieving that figure does not appear sound and reasonable in the context of proper Development Plan policies.

- 1.8. In our view BDC need to make provision for a very substantially increased figure well above the 7,000 dwelling level at this time irrespective of the overspill needs of the City of Birmingham which will be quantified in due course.
- 1.9. In our view the Plan as submitted cannot possibly meet the objectively assessed development and infrastructure requirements because the authority have not undertaken a rigorous and proper objective assessment. In addition BDC have not positively and properly prepared their Plan because it is not consistent with achieving proper and reasonable sustainable development to meet the long-term needs of the District and its inhabitants.
- 1.10. In terms of justification the Plan cannot possibly be said to be founded on a robust and credible evidence base and even their outdated base has causes for concern. There is no proper economic modeling and neither is there any proper housing and population modeling. South Worcestershire had modeling for both of these albeit that they were found to be gravely wanting by the Inspector in his Initial Recommendations. Most importantly we see very little proper reasoned approach by BDC to formulating the most appropriate strategy from a series of alternatives. Where are the alternatives? Where is the justification for choice from these?
- 1.11. In terms of effectiveness, there is no reasoned justification for "deliverability of the Plan" but of course because BDC have adopted a minimalist approach they are bound to deliver this strategy by default but that does nothing to underpin a proper and reasonable future for the District as a whole.
- 1.12. From discussions at the Solihull, Lichfield and South Worcestershire Local Plan Hearings the Duty To Co-Operate goes hand-in-hand with the need for effective joint working across boundaries to identify strategic priorities for those concerned. We raise at this time substantial doubts on both counts of failing the Duty To Co-Operate but also failing to work on cross boundary issues. BDC should be asked to provide proper statements clearly identifying where they have started to co-operate and with whom, and when they started the cross boundary working, particularly in the case of the City of Birmingham and its requirement for very substantial housing provision outside its boundary.
- 1.13. We reserve the right to submit an additional Housing and Housing Land Review Statement following further detailed analysis of the background documents by our consultants.



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**REPRESENTATIONS
BY THE TAYLOR TRUSTEES
IN RESPECT OF THE**

**BROMSGROVE DISTRICT COUNCIL
LDF DRAFT CORE STRATEGY 2
POLICIES**

**Bigwood Associates Ltd
Town Planning and Development Consultants**

COMMERCIAL & RESIDENTIAL AGENCY, PROPERTY MANAGEMENT, VALUATIONS, AUCTIONS
AGRICULTURAL, PROFESSIONAL CONSULTANCY, BUILDING, SURVEYING, DEVELOPMENT & PLANNING

1. BACKGROUND

- 1.1. The Taylor Trustees own approximately 25.4 hectares (approximately 63 acres) bounded by the A435 Hollywood by-pass and the Alcester Road South, known as the Maypole, Birmingham. The present Trust have owned this parcel of land for over 25 years. The farmland is tenanted and principally used for pasture. Access is off Alcester Road South via a driveway that leads to the Blind House Farm complex.
- 1.2. The Taylor family history of involvement in Birmingham is founded on the button manufacturing business they had in the Jewellery Quarter at the time of the Industrial Revolution where there were important links with Murdoch, Boulton and Watt in modernising and mechanising the various industries. John Taylor (1710-1775) was at the forefront of Birmingham's history establishing in the 1750s the city's first recognisable factory employing over 500 people. In 1765 John Taylor approached his friend and fellow Quaker Sampson Lloyd, the latter a successful Birmingham ironmaster, and together they founded Taylor & Lloyds, the city's first bank and today trading as Lloyds Bank. The aim was to support fledgling businesses in Birmingham. On Taylor's death in 1775 Aris's Birmingham Gazette, the city's first newspaper, recognised the importance of John Taylor to the emergence of Birmingham as a foremost manufacturing town. It praised him as "a man to whose extraordinary Ingenuity and indefatigable Diligence, the Trade and Manufactures of this Town are much indebted for their Increase and Estimacion".
- 1.3. Given the history of the Trustees and their connection to the Industrial Revolution they have resolved that they would wish this parcel of land to be used to provide opportunities for the establishment of engineering industries involved in high technology and particularly those following the "green technology route". This then would be consistent with the history related to the present date.
- 1.4. The ethos of the proposal is therefore to provide a Science and Research Park for hi-tech green engineering businesses in a parkland setting framed round a central

facilities hub unit offering a range of accommodation from "start-up" units to "follow-on" accommodation to allow new businesses to commence operation and the expansion of those already in an infant state.

- 1.5. The proposal will have as its operational base a Joint Venture between the owners and the Universities of Birmingham, Aston with its Science Park, and the University of Warwick with its engineering department together with a supporting developer.
- 1.6. All three Universities have substantial Post Graduate research and the proposal would seek joint working relationships with the Universities to progress business opportunities related to that engineering technology with the clear national and international trade benefits that would ensue. It is envisaged that many of the units will actually have manufacturing facilities with them as well as the Science and Research function. The proposal would not in any way be advanced to conflict with or upset the present operational functions of the three Universities and their on-site Science Park units.
- 1.7. Owing to the fact that this strategic parcel of land sits right on the edge of the City of Birmingham boundary, with its nearly 1,000,000 population, it is technically within the boundary of the Bromsgrove District Council administrative area, hence the reason for submitting representations on this draft Core Strategy.
- 1.8. The Coalition Government have established the requirement for cross-boundary co-operation through the provision of Local Enterprise Partnerships and the City of Birmingham have an LEP both with Bromsgrove District Council as well as the Metropolitan Borough of Solihull.
- 1.9. We are not convinced that the draft Core Strategy Vision has been sufficiently wide ranging to seek to achieve a better balance between future Employment provision and housing, the need to provide more Employment land and the need to provide more sustainable development to seek to restrict the high out-commuting from Bromsgrove District to the conurbation for work. It is our view that there is not sufficient data

background collected by Bromsgrove District or the analysis to support the proposals made by the district Council in respect of Employment provision because of the lack of a wide ranging evidence base now required by the Government as set out below.

- 1.10. Recent Ministerial Statements and the Government's Proposals for Growth for the economy underpin the above proposals by the Taylor Trustees and are therefore in line with the Government's national and strategic strategy.
- 1.11. The Government's strategy is not enshrined in the draft Core Strategy of Bromsgrove District Council and for that and related reasons the Core Strategy is therefore unsound and deficient at this time, requiring substantial amendment, re-drafting and re-issuing as a consultation document. This particular point is a Legal submission by the Taylor Trustees that the present draft of the Core Strategy is, in our view, open to Legal Challenge because of the Government's recently indicated strategy generally referred to above but where the details are vitally important in respect of the formulation and final drafting of this very important Policy document.

2. REASONS FOR SUBMISSION OF REPRESENTATIONS TO THE CORE STRATEGY

- 2.1. The representations are based upon the proposal to provide a Science and Research Park for "green engineering", effectively a niche business park with relating facilities and hob and where, at the present time, the land lies in an area of allocated Green Belt but directly on the edge of the built-up area of the City of Birmingham at the Maypole.
- 2.2. The representations are intended to assist and provide a positive policy base from which the proposals can then proceed and be implemented through an appropriate planning permission.

3. REPRESENTATIONS

3.1. Background

3.2. Whilst it is acknowledged that the number of unemployed in Bromsgrove is lower than the West Midlands average, that number has increased significantly since the source data of April 2009 to March 2010 was compiled and is now nearer to the West Midlands average which makes the case even more important for adding to the employment base of the district overall where that is opportune and where that increase in employment levels could be significant through the provision of a sub-regional and niche business park.

3.3. The City of Birmingham, with its nearly 1,000,000 population, is substantially deficient in its southern quadrant of business parks and employment areas to support the huge population that exists in this area effectively from and including Kings Heath out to the Maypole and the related side districts off the A435.

3.4. The A435 is a principal feed from the City to the M42 and the direct link thereby to the M40, Oxford and West London.

3.5. To have a niche business park on the A435 in the position that is proposed takes advantage of the road trunk route as well as consolidating a "sustainable" style and form of development for the benefit of both the city of Birmingham and Bromsgrove and serving the southern quadrant of Birmingham.

3.6. Chapter 3 – Key Challenges

3.7. Bullet points 3 and 7. This should reflect the need for an informed "Vision" for the district, as referred to above, which does not appear to be there to any significant extent. For instance, there has been little survey data of existing businesses within the district over the last year looking at their vision, their needs and likely expansion within the Plan period. This is an important piece of data that appears to be missing,

particularly at a time when the economy nationally appears to be on the turn and some niche businesses are experiencing significant upturn. We would suggest that this bullet point should be re-drafted to read "Responding to the vision and needs of ...".

- 3.8. 8th bullet point. This bullet point recognises the substantial benefit both regionally, nationally and internationally from Bromsgrove diversifying its local economy and providing a better base of new "... hi-technology industries, green industries ...". Our proposal above fully meets and endorses the thrust and challenge adopted by Bromsgrove. In addition we raise the point as referred to above, about the lack of positive data on the future vision of the existing major employers in the district. There should have been recognition to support and diversify those existing employers as well as, and importantly, providing the opportunity for new hi-technology and green industries to diversify and stimulate the economy, particularly at this poor economic time. This key challenge bullet point could really have benefited from a brief number of examples, eg green engineering, Science and Technology businesses, other related green manufacturing businesses as well as more purist Science Research where there is an application for major business opportunities related both to employers within the Bromsgrove district but perhaps more importantly to those major employers within the City's boundaries that are not yet supported.
- 3.9. In terms of the 9th bullet point, this comes back to the need for a vision for a wide ranging employment base and a stimulus from the Borough for those existing employers, and particularly the major employers, in attracting and training both school and college leavers but perhaps more importantly providing opportunities for Graduates / Post Graduates to move into commerce and industry to continue and provide technological improvement and proficiency.
- 3.10. **Strategic Objectives**
- 3.11. **SO5.** Again, this objective lacks vision and the support from existing data relative to the existing businesses with a view to focusing on provision of new businesses in the

District. In addition, because of the cross-boundary arrangements and the L.E.P., Bromsgrove should have worked with Birmingham to have looked at issues from within the Birmingham boundary that could not reasonably have been addressed because of the tight local government boundary and most particularly because of the lack of appropriate Business Parks within the southern quarter of the City of Birmingham. This is therefore a major deficiency within the Core Strategy based upon a lack of positive data and a lack of a proper long term vision. Our Clients fully support the wording of the Strategic Objective SO5 with the addition that it should reflect the requirement for Science-based Research and Development within a niche Business Park supported by the Universities mentioned above.

- 3.12. There does not appear to be a Strategic Objective dealing with the need for high quality buildings in the commercial and industrial sector. This is now a prime requirement of the Coalition Government and it goes hand in hand with the need for both sustainable developments and sustainable buildings with low carbon footprints.

3.13. Core Policies

3.14. Core Policy 1 – Future Development

- 3.15. There is reference in Table 1 to the provision of a further 28 hectares of Employment land in the time period 2006-2026. Firstly this Core Policy should have and does not record how many hectares have already been provided in the 2006-2010 time period thus leaving a residue to be provided. This is a major omission and for this reason alone this Policy is not sound. In addition we see no data supporting the figure of 28 hectares or any rationale for this. Bromsgrove is a very large and diverse District, vitally on the edge of the conurbation, with immediate and direct links to Birmingham and Redditch and with the recent feature of the Local Enterprise Partnership with Birmingham and Solihull focusing on new growth. There is to our mind no technical support data to say that Bromsgrove have consulted with Birmingham on cross-boundary issues and the need for Birmingham to have a new Business Park on the edge

of its Local Authority boundary to enhance and support the population in the southern quarter of the City.

- 3.16. Therefore, in our view, the gross total of 28 hectares is unrealistic for this District, it is not sufficient, and the figure should be circa 75 hectares. Only by having this level of provision can the two Authorities of Bromsgrove and Birmingham realistically co-operate in providing a balanced approach to both Local Authority areas and their requirements in the Plan period of up to 2026. It is not unreasonable for Bromsgrove to have this level because it is assisting the City of Birmingham and there is precedent at Longbridge for an increase in provision where new housing is to be provided in Bromsgrove's district to support the Longbridge redevelopment scheme. This is therefore a direct parallel of that approved and committed policy framework.
- 3.17. Again, the Policy does not focus on "sustainable employment provision". It should have done so because it is well documented and acknowledged that Bromsgrove has very substantial out-commuting to the conurbation and therefore new "sustainable employment provision" within its District boundaries, based upon sustaining, enhancing and expanding existing in-situ industries / employers would have a far greater impact and would be better in sustainability terms than is set out in this draft Policy at this time.
- 3.18. For all these reasons above, and others, Core Policy 1 and its target are fatally flawed and therefore unsound in Planning Policy terms both in terms of the lack of positive data, the lack of positive collection of data, the lack of an appropriate vision and the lack of cross-boundary liaison, none of which is reflected in this policy and supports the submission of the Policy being "unsound".
- 3.19. On a subsidiary issue under this Policy, it would have been far better to have divided this key Policy in two, one relating to Housing and the other relating to Employment, with a proper reasoned justification for this proposal. There is virtually no reasoned

justification and certainly no strategic indications of where the provision ought to take place

3.20. Core Policy 3 Development Principles

3.21. For reasons set out in our representations on Core Policy 1, Core Policy 3 ought to reflect the "development principles" for the enhancement and expansion of economic development based principally but not solely on existing industries / employers but to meet the thrust of the strategy for new hi-technology and knowledge-based industries, particularly those "green industries" and those relating to a more sustainable world environment. We see nothing in Core Policy 3 that reflects the Bromsgrove Council priorities of CO1 Regeneration, Priority Economic Redevelopment or reference to the sustainability principle and the sustainability appraisal or the cross-boundary requirements to look at population, provision for Employment where this is lacking. This Policy should have consequential wording amendments as indicated above to be an effective policy for the Plan period.

3.22. Core Policy 4A Bromsgrove Town Expansion Sites Policy

3.23. We note from this Core Policy that provision will be made for 5 hectares of Employment land in and around Bromsgrove town, principally in relation to site BROM2. If this is the case how are Bromsgrove District going to provide the other 23 hectares of land under Core Policy 1 when there is no guarantee that either the rest of the BROM sites or "other development sites" will actually provide employment. This is particularly the case when looking at Table 3 the majority of the employment provision, other than Bromsgrove Town BROM 3 will be the Ravensbank expansion site directly adjoining Redditch District's boundary and with little benefit realistically for Bromsgrove itself, albeit some cross-boundary benefit. Even with this there still will be a need for circa 13 hectares but again no Vision for the District, no Vision and assistance to assistance major employers and a real lack of data and strategy within these Core Policies. Finally BROM 3 mentioned above is strategically on the south-western edge

of Bromsgrove adjoining the M5 unrelated to the M5 which runs along its western boundary with extremely poor access to that motorway and the M42 and really lacking major road infrastructure to connect it. Not a place for strategic major employment.

3.24. We have focused here only on the Bromsgrove Town Expansion Sites policy but clearly there is a Visionary need to look at supporting strategic Employment sites for the benefit of the whole district for the reasons given above and in particular, the provision that we are suggesting at the Maypole details of which are set out above.

3.25. Core Policy 11 – New Employment Development

3.26. Whilst it is accepted and acknowledged that Bromsgrove will support the Regional Spatial Strategy's "Central Technology Belt" from Birmingham City centre, and its Universities, out to Bromsgrove and then to Malvern it does not acknowledge the existence of the Coventry-Solihull-Warwick Technology Belt or its boundaries with Bromsgrove District Council.

3.27. The A435 Birmingham-Alcester/Evesham sits on the edge of, and is included within, that Coventry-Solihull-Warwick Technology Belt through its A435/M42/M5 link to Warwick University and through the M42/A45 to Coventry.

3.28. The production of the draft Core Strategy for Bromsgrove District offers the Vision and the opportunity to enhance that RSS strategy, not yet abandoned, by providing appropriate new employment development at key locations within its District relative to that Belt and zone such as at the Maypole with the consequential huge benefits for Birmingham and the southern quarter of that City. The acknowledgement and benefit of that Technology Belt would allow new development on the edge of that Belt and the Birmingham City boundary and could lead to consequential growth in employment, training and widening of skills.

3.29. In our view, Core Policy 11 has not looked at the existing data either from the existing major employers in Bromsgrove or those in the southern quarter of Birmingham and

there has been no cross-boundary recognition of the need to provide that evidence data base to properly inform the Core Strategy for its policies. For that reason the District has not sought to apply an appropriate vision, particularly for a Plan period that has another 15 years to run. Had it done so, it would have produced a new Core Policy aimed at the Coventry-Solihull-Warwick Technology Belt widening, if necessary, to include the A435 trunk road corridor. Again, the Policy is not sound because it has lacked proper planning vision, lacked spatial awareness through lack of proper data and communication with major employers in Bromsgrove and Birmingham requesting their vision. In addition, it has not sought, which it should, to provide sufficient data from its strategic decision to look for hi-technology and knowledge-based industries to inform itself on the true level of demand required relative to the need and for that reason we believe that Bromsgrove have under-provided for the employment target for the District within the Plan period which we have submitted should be 75 hectares. Therefore, we maintain Objections to Core Policy 11 because it is unsound for the above reasons.

3.30. Core Policy 13 Rural Regeneration

3.31. We refer to our representations on the other Core Policies relative to employment provision above and there is nothing in this Policy to support the provision of strategic new employment areas within the district to meet the Core Policy strategy for new employment in the hi-technology and knowledge-based industry areas. This Policy needs to be restructured to properly allow new sustainable development based upon their vision and needs for the rest of the Plan period. Again there is no vision in this Policy and no back-up from appropriate data and as such those wishing to effect new major businesses in the Rural Areas will technically fall foul of this Core Policy and be refused planning permission. This cannot be right in the context of the District that has set out its key objective to retain, sustain and expand its employment base with sustainable new development and an objective to reduce travel to work outside its District boundary. Essentially the District have failed to take account of existing

employment and the provision of new employment within their District related to a proper and informed vision for the future of the District based upon their key objectives. For this reason this Policy needs substantial amendment and not just for existing major employers but also to take account of the likely provision of strategic new employment sites within the Rural Areas with the key objective of regeneration. Again new sustainable strategic employment sites will all foul of Core Policy 13 on the submission of a planning application and should not simply have to rely upon "very special circumstances" when one of the key objectives of the District is an expansion and widening of the employment base.

3.32. Core Policy 14 Sustainable Transport

3.33. We believe that at the start of that Policy there ought to be an additional bullet point supporting the provision of new transport links, as well as "Park and Ride" facilities relative to the A435 in order to support and enhance provision for the population of the southern quarter of Birmingham within and beyond the end of the Plan period. For this reason we would support a new Core Policy specifically aimed to support the City of Birmingham for the provision of a new "Park and Ride" facility at the Maypole, as previously supported by the Secretary of State in the Appeal Decision on this land.

3.34. Land at the Maypole and its development as part of any planning application package could show and demonstrate that there are real benefits for sustainability of development and buildings by appropriately providing a sustainable transport solution on the edge of Birmingham and the A435 trunk road to the M42 and the M40.

3.35. Core Policy 22 Green Belt


3.36. There should be a positive recognition in this Green Belt Policy that strategic allocations of new employment land to facilitate the strategic and Key Objectives of the Core Strategy for new development for hi-technology and knowledge-based industries, such as that proposed for the land at the Maypole, should be allowed in line

with the Coalition Government's commitment to growth in the economy and the need, where proven, to take allocated Green Belt land for demonstrable needs.

- 3.37. Therefore, the provision of new strategic employment sites should, as of right, be excluded from the Green Belt when designated and allocated under the appropriate Development Plan Documents but that this particular Policy, Core Policy 22, should allow for that consequential adjustment.

4. CONCLUSION

- 4.1. We submit that for the above reasons and justification set out above, that there are significant elements of the draft Core Policy that are unsound and we suspect capable of successful Challenge, that the draft Core Strategy should be reviewed, a wider evidence base undertaken and a new draft Core Strategy issued for consultation in line with the Coalition Government's recent Ministerial Statements, the Budget Statement and the national Policy of Growth



April 2011

5. Do you consider the BDP is sound? (see Note 3)

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

(1) Justified (see Note 4)	<input checked="" type="checkbox"/>
(2) Effective (see Note 5)	<input 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. (Continue on a separate sheet /expand box if necessary)

We set out above in 3 above reasons why the DBP is unsound in compliance terms. If the compliance issues are not addressed then the Bromsgrove Development Plan must be found to be 'unsound' as Birmingham CC's housing shortfall numbers have not been taken into account as part of the Duty to Co-operate.

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)

Given our submission that Bromsgrove DC requires substantial additional housing land provision to meet the expected need, the present Local Plan housing figures need amendment and there needs to be consequential land allocations.

In addition those settlements that are capable of accommodating additional housing growth, such as at Alvechurch, without unreasonably compromising the sound planning of the area should be identified and provision made accordingly.

We consider that additional landholdings on the boundary of the Bromsgrove and Birmingham administrative areas should be identified and brought forward for release to fulfil Bromsgrove's duty to assist in the provision of overspill housing from Birmingham CC housing.

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 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)

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)

CPBigwood Ltd

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

Page:	2 to 5	Paragraph:	1.1 to 1.27	Policy:	Introduction and Context
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes:	No:x
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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)

On behalf of our Clients, Taylor Trustees who own two parcels of land at the Maypole, Birmingham, details of which are set out on the attached three Statements together with, our representations in respect of employment and employment land; housing and housing-related policies in the Bromsgrove Local Plan and which are attached.

Whilst we believe that Bromsgrove DC have provided a good summation of the policy framework to its District Plan, we consider that it falls in terms of 'Compliance' on one fundamental principle: the Duty To Co-operate (DTC).


Attendance at the recent Examination Hearings for the South Worcestershire Development Plan and the re-opened Solihull Metropolitan Borough Council Local Plan saw lengthy debate on the fact that Birmingham City Council had not, at the time of those Examinations, had its Development Plan approved for consultation by its Cabinet on the 21st October. The lack of information on the housing numbers required by Birmingham CC led to very serious debates on 'Duty to Co-operate Compliance' in respect of those development plans which posed considerable concerns for those Independent Inspectors.

Until the housing shortfall in Birmingham's administrative district has been determined and agreed none of the authorities adjoining Birmingham's administrative boundary can properly, justifiably or positively plan for the Birmingham housing shortfalls that must be addressed to inform their Development Plans and the work undertaken as part of the GBSLEP.

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)

To ensure legal compliance, Bromsgrove DC must have meaningful discussion with Birmingham CC on housing provision which cannot happen until Birmingham has formally agreed those numbers. If full DTC compliance does not take place, then we believe a similar scenario to the South Worcestershire and Solihull Independent Examinations will be evidenced at the Independent Examination of the Bromsgrove District Plan if Birmingham CC's housing numbers are not properly identified and addressed positively.

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers.

Signature: 

Date: 11th November 2013

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)

CPBigwood Ltd

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

Page:	6 to 10	Paragraph:	2.1 to 2.31	Policy:	District Profile
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 checked="" 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)

The Local Plan fails to plan positively for future growth both of the District and also particularly for the expansion of Birmingham beyond its boundaries to accommodate proper employment and housing growth as we now know it requires within the Plan period.

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)

The Plan should be amended accordingly in line with our submissions in paragraph 3 above.

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)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

We have reviewed the Social Characteristics contained within the BDP, particularly the demographics related to the Elderly, allied specifically to the significant projected increase of the 65+ age group in the Plan period to 2030. We have noted the provision of housing 'suitable for the Elderly', identified at Key Challenge 4, and are pleased to see the provision of policy BDP10: Homes for the Elderly. However we record that in our view the Plan does not identify sufficient provision within it to accommodate the substantial need in housing terms

to meet this very considerable need. Frankly the Plan needs to identify strategic releases and not just rely upon the vague possibility that the "market" ie national house builders etc will provide such accommodation in bringing their strategic housing schemes forward. The identification of land for Continuing Care Retirement Communities and market provision for the Elderly under both Use Classes C2 and C3 respectively should be identified both in numbers and locations to meet this unquestionable high need in the Plan period. In addition we must question if sufficient housing will be delivered to mitigate against the substantial increase in that age range, especially those Elderly who are in need of care.

As identified at the South Worcestershire Local Plan Hearing the Borough needs to make provision for both C2 and C3 housing to cover the wide spectrum of requirements for the Elderly.

In addition the District Profile does not properly look at the requirements of businesses either on the edge of Birmingham or within the Bromsgrove District as to their requirements for consolidation, extension or expansion within the Plan period. There is nothing to indicate that a proper review of the District has been undertaken in the preparation of this Plan, as required.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

The Plan needs to be amended to take account of our submissions in paragraph 3, 4 and 6 above.

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 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)

Our attendance is necessary as our Clients have landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly

Signature:



Date: 11th November 2013

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)

CPBigwood Ltd

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

Page:	11 to 13	Paragraph:	3.1 and 4.12 to 4.13	Policy:	Key Challenges and Vision
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

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)

The Key Challenges do not properly identify the range of scenarios for growth albeit that in paragraph 3.1 3) it does state that the Plan should meet the growth needs without adequately or properly defining what those are. Generally we accept the Key Challenges but must record here that those Key Challenges have not reasonably and soundly been met in the production of this Local Plan, hence our representations.

In terms of the Vision, in reading paragraphs 4.1 to 4.13 it must be concluded that that was an aspirant Vision and more reflects hope than it does positive planned growth to meet those aspirations and the Key Challenges and therefore the Plan fails and is not therefore sound.

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)

The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.

5. Do you consider the BDP is sound? (see Note 3)

Yes: No:

Do you consider the BDP is unsound because it is not:

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

Generally we embrace the Vision for Bromsgrove District as provided in the BDP in terms of sustainability and economic development, subject to our comments in 3 above. However aspirations must be seen in policy terms to be provided and hence deliverable within the Plan period. This is particularly so in terms of the provision of a Policy for the Elderly enabling those Elderly to age in place in a safe environment with their friends particularly in the larger, sustainable settlements. However, it is acknowledged nationally that funding for that government initiative is severely limited and the private sector is having to provide substantially more provision for the Elderly in terms of Continuing Care Retirement Communities, Extra-Care provision, Independent Living and Sheltered Housing. Further, some Elderly housing provision will have to be Affordable and thereby by rent rather than by purchase. There is a failing in the Plan in not properly addressing these very important issues at this time based upon the very considerable need identified by BDC.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

The Plan needs to be amended to take account of our submissions in paragraph 3 above and 6 below.

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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)

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly.

Signature

Date: 11th November 2013

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)

CPBigwood Ltd

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

Page:	14	Paragraph:	5.1	Policy:	Strategic Objectives
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

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)

The Strategic Objectives do not include the need for a more appropriate review of housing provision within the District as a whole. Whilst focusing new development in sustainable locations on the edge of Bromsgrove might be appropriate in part, the Objectives need to focus on all settlements that can properly accommodate reasonable growth. There is no focus on the hierarchy of settlements for the growth which there should be. Strategically Objective SO4 really does not go far enough in covering all requirements necessary for this District within the Plan period. Again, Objective SO5 gives very little detail whatsoever to the aspirations of the Council as to the types of new businesses that it might wish and where those are to be accommodated.

As a whole the Strategic Objectives are not translated properly and appropriately into the policies that have now been proposed for the District in this Local Plan and it can be said that some of those Strategic Objectives cannot be met in part in a number of cases.

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)

The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.

5. Do you consider the BDP is sound? (see Note 3)

Yes: No:

Do you consider the BDP is unsound because it is not:

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

Generally we embrace the Vision for Bromsgrove District as provided in the BDP in terms of sustainability and economic development, subject to our comments in 3 above. However aspirations must be seen in policy terms to be provided and hence deliverable within the Plan period. This is particularly so in terms of the provision of a Policy for the Elderly enabling those Elderly to age in place in a safe environment with their friends particularly in the larger, sustainable settlements. However, it is acknowledged nationally that funding for that government initiative is severely limited and the private sector is having to provide substantially more provision for the Elderly in terms of Continuing Care Retirement Communities, Extra-Care provision, Independent Living and Sheltered Housing. Further, some Elderly housing provision will have to be Affordable and thereby by rent rather than by purchase. There is a failing in the Plan in not properly addressing these very important issues at this time based upon the very considerable need identified by BDC.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

The Plan needs to be amended to take account of our submissions in paragraph 3 above and 6 below.

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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)

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly.

Signature: 

Date: 11th November 2013

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)

CPBigwood Ltd

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

Page:	17	Paragraph:		Policy:	BDP1: Sustainable Development Principles
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

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)

There is no shadow of doubt that Bromsgrove will have to provide substantial additional housing land and it will need to look at the boundary with Birmingham City Council, and land in sustainable villages such as Alvechurch that can be released without demonstrable harm. This is particularly so in the case of proper housing provision for the Elderly where sustainable parcels of land are important in the context of access and facilities.

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)

The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.

5. Do you consider the BDP is sound? (see Note 3)

Yes: No:

Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

We have reviewed the principles of Policy BDP1: Sustainable Development Principles. However, given that BDC will require substantial additional housing, these sustainable principles may need revision to properly reflect the NPPF as it appears that some of the sub policies are not NPPF-compliant.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

The Plan needs to be amended to take account of our submissions in paragraph 3 above and 6 below.

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 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)

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly

Signature

Date: 11th November 2013

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)

CPBigwood Ltd

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

Page:	18 - 20	Paragraph:	8.9 - 8.17 and Table 2	Policy:	BDP: 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:

No:

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)

Generally we accept the basis of the settlement hierarchy in Police BDP2 except for the fact that BDC should be making provision for housing to accommodate the necessary housing needs of Birmingham beyond its boundary and therefore Policy BDP2 should be amended with a new sub clause to include the provision of new housing and employment land around the southern boundary of the City of Birmingham within Bromsgrove's administrative area.

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)

The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.

5. Do you consider the BDP is sound? (see Note 3)

Yes:

No:

Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

The Plan is unsound because Bromsgrove have not properly reflected cross boundary issues with the City of Birmingham or taken account of any need that is clearly required by Birmingham for additional housing growth in the Bromsgrove District to satisfy that acknowledged substantial housing need by the City of Birmingham.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

The Plan needs to be amended to take account of our submissions in paragraph 3 above and 6 below.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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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)

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly

Signature:



Date: 11th November 2013

Part B (see Note 1 and Note 3 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)

CPBigwood Ltd

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

Page:	21	Paragraph:	8.1 to 8.27	Policy:	BDP3: Future Housing and Employment Growth
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

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)

We would refer to our Background Housing Statement and our contention that under Policy BDP3 future housing growth is substantially under-provided for the District within the Plan period for the reasons given in that Statement. In addition we have reserved the position to present a further Background Housing Statement once our sub consultants have reported back relative to the most likely household formation for the District within the Plan period, the effect of the economic upturn, the under-provision of employment land and the consequential need to balance, as far as possible, housing land and employment land proposals, the likely need to accommodate some of the Birmingham City Council housing need within this District, and the need to properly provide for the Elderly as a consequence of the demographics for the District and the under-provision of affordable housing.

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)

The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.

5. Do you consider the BDP is sound? (see Note 3)

Yes: No:

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 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. (Continue on a separate sheet /expand box if necessary)

We have referred within this submission to the lack of proper housing provision at the right level for the District as a whole consequent upon the proper demographics, and an economic policy of stimulation for the District as a whole in line with present government advice and in line with the proposals that were evident in Draft Core Strategy 2 and its related policies. For all of these reasons, as referred to in our Background Statement, the Plan has not been positively prepared, cannot be properly justified and is not effective because it has not been based upon proper, effective joint working on cross boundary strategic priorities. We are not assured that Bromsgrove have carried out effective and proper consultations on the Duty To Co-Operate.

Most importantly this base Policy has not been properly and objectively prepared, has not been the subject of properly thought out alternative scenarios and a consequential selection of an appropriate strategy, which should be based upon the government's policy for economic growth through stimulation of the economy and thereby businesses. For our Clients there appears to be no cross boundary consultation notwithstanding our Clients long history of representations to bring their main parcel of land forward for employment. The attached Background and Background Employment Statement confirm their history of representations. The present Plan has not taken account of representations on the LDF Draft Core Strategy 2 and its positive employment growth policy. This Background Employment Policy takes no account therefor of government advice, the actions and proposals of the Worcestershire LEP and the Greater Birmingham and Solihull LEP, the unequivocal need for substantial additional employment land within the District and most particularly, land to serve southern quadrant of the City of Birmingham such as our Clients landholding at the Maypole.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

The Plan needs to be amended to take account of our submissions in paragraph 3, 4 and 6 above.

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 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)

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout

the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove and Birmingham to deliver appropriate employment provision as well as housing.

Signature:



Date: 11th November 2013

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)

CPBigwood Ltd

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

Page:	23	Paragraph:	8.28 to 8.39	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 type="checkbox"/>	No: <input checked="" 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)

We have made a number of submissions in respect of other Policies and in particular those Policies relating to housing, employment, provision for the Elderly, rural renaissance, etc. The consequences of those submissions will require amendments to the Green Belt Policy. Therefore the physical boundary of the Green Belt, as indicated on the Policies Map, will need amendment.

In terms of the submissions made in respect of the expected higher requirements for new housing and employment land, we would submit that the present Local Plan is not sound at this point in time because a proper and reasonable Green Belt Review has not taken place. It is irresponsible to indicate that that Green Belt Review should not commence until 2023 when it is already known that the City of Birmingham will require housing and employment land in Bromsgrove to meet their known targets. Frankly the present Plan should be declared unsound and the Green Belt Review started immediately.

Consequential on our submissions on employment sub-Policy BDP4.4 needs to be amended to allow for consolidation, expansion and extension to existing commercial operations in the Green Belt and very particularly for those accepted major County employers. This would include major farm complexes where they have a commercial operation. There needs to be amendment to take account of new employment for the City of Birmingham beyond their boundary that would support them.

Finally it needs to be acknowledged that provision for the Elderly, both C2 and C3, may need to be accommodated adjoining the Birmingham / Bromsgrove boundary and there ought to be a sub-Policy allowing that to happen, subject to justification of the demographic need.

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)

The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.

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)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

We have set out in 3 above the basis of our submissions. Consequent upon those housing and employment submissions the Green Belt boundary, as presently shown, cannot be acceptable and the Plan is therefore unsound as such. The basis of the Green Belt Policy in BDP 4 needs consequential amendments as in 3 above and we have set out the reasons why, in our view, it is not sound. Firstly it has not been properly and objectively assessed in terms of the development needs and neither is it consistent with achieving sustainable development to have a Green Belt Policy in the form set out in BDP 4. Neither is BDP 4 justified because the Plan is not founded upon a proper robust and credible evidence base and neither were there proper and reasonable alternatives with a credible strategy. Therefore the implications of BDP 4 require substantial amendments to the Plan to provide the necessary development and opportunities to fulfil the economic requirements of the District as required by present government strategy and by the policies of the LEP and GBSLEP. The Plan is therefore unsound.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

The Plan needs to be amended to take account of our submissions in paragraph 3, 4 and 6 above.

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 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)

Our attendance is necessary as our Clients have landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process.

Signature:



Date: 11th November 2013

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)

CPBigwood Ltd

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

Page:	48 - 49	Paragraph:	8.87 to 8.97	Policy:	BDP7 Housing Mix and Density
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

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)

This Policy does not refer to market demand or the requirements of the market. It should do so. BDC can only reasonably identify need through its housing waiting list. These waiting lists are notoriously inaccurate. Market demand is wider and more encompassing. Whilst BDC may wish to concentrate on 2 / 3 bedroom dwellings to accommodate some of the Elderly provision, there is a considerable need for 4 / 5 bedroom dwellings and in at least one large settlement some single bed dwellings. Both the market demand and need changes over time, sometimes year by year. This Policy is too prescriptive and each case must properly be dealt with on the merits of the application and the location of the site at that time. There is no reference in Policy BDP 7 to a requirement for housing for the Elderly in need of care. Some of this will be 1 bedroom and some of it will be 3 bedroom, the third bedroom as a visitor bedroom. Neither does this Policy include any form of institutional, Class C2, provision by reference.

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)

To avoid misunderstanding, this Policy should be re-worded to include reference to the submissions in 3 above.

5. Do you consider the BDP is sound? (see Note 3)

Yes: No:

Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

The Policy is not soundly based or in line with NPPF / present government advice based upon the submissions above.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

The changes identified above will provide a more robust, credible and proper base for this Local Plan.

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	
Yes, I wish to participate at the oral examination	x

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)

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which should be released for development, and they believe that it would be most appropriate to make a presentation orally.

Signature:



Date: 11th November 2013

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)

CPBigwood Ltd

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

Page:	50 – 52	Paragraph:	Policy itself	Policy:	BDP8 Affordable 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: No:

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)

Policy BDP 8.5 should be removed from this Policy and inserted into Policy BDP10: Homes for the Elderly, where it is more appropriate. The wording does not refer to the heading on this Policy!!

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)

Delete sub-Policy BDP 8.5

5. Do you consider the BDP is sound? (see Note 3)

Yes: No:

Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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 justification in 3 above.

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)

Delete sub-Policy BDP 8.5 as it is not appropriate and therefore no sound.

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	
Yes, I wish to participate at the oral examination	x

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)

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which should be released for development, and they believe that it would be most appropriate to make a presentation orally.

Signature:



Date: 11th November 2013

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)

CPBigwood Ltd

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

Page:	55 and 56	Paragraph:	8.119 to 8.128	Policy:	BDP10: Homes for the Elderly
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

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)

We support the thrust of this Policy. In BDP 10.3 there needs to be amended to include the wording, "nursing homes", "residential homes for the Elderly" and "sheltered housing", all of which provide accommodation for the Elderly to meet the required substantial need. Most often Elderly housing is provided by Specialist housing providers and BDC must include a reference to the provision of such accommodation on the edge of the larger settlements where those settlements have tight Green Belt boundaries and where provision for the Elderly could be made sustainably and without undue harm to the Green Belt..

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)

Policy BDP 10.3 needs consequential amendment in line with 3 above.

Policy BDP 4: Green Belt needs consequential amendment to provide for sites for the Elderly on the edge of the larger settlements presently in the Green Belt.

5. Do you consider the BDP is sound? (see Note 3)

Yes: No:

Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

We have reviewed Bromsgrove's Policy for the Elderly, the demographic statistics which underpin this Policy and the need for a 'dramatic change in house building in the District' to provide alternate forms of housing provision for the Elderly. This should be applauded.

However there are circumstances in which the Elderly will require more specialised housing that includes the provision of care. CCRCs have been instrumental in providing a range of housing choices from 'entry level' care requirements to specialist units within those villages for Alzheimer / Dementia-related illnesses where there is a requirement for the housing units to be of a larger size overall to cater for the equipment which may be required to dispense the care requirement.

In providing CCRC villages it should be borne in mind that in addition to the specialist level of housing, those villages additionally fulfil primary / tertiary employment needs as care is on a 1:1 basis. The minimum 60/70-bed care home element of a CCRC can provide 70-100 jobs which is not insubstantial therefore fulfilling social and economic development in a sustainable settlement such as Alvechurch.

Policy BDP 10 needs consequential amendment based upon 3 above and our submission above.

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)

Consequential amendments to the details of Policy BDP10 and Policy BDP 4: Green Belts.

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	
Yes, I wish to participate at the oral examination	x

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)

Our attendance is necessary as our various Clients have landholdings in Bromsgrove's administrative area which should be released for development, mostly identified through the SHLAA process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly as well as related Affordable housing.

Signature

Date: 11th November 2013

Part B (see Note 1 and Note 3 para 4.2)

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

Name or Organisation (see Note 3 para 4.1)

CPBigwood Ltd

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

Page:	60 to 62	Paragraph:	8.140 to 8.153	Policy:	BDP13: New Employment Development
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

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)

Our Background Statement on Employment and Employment Land should be read in conjunction with our representations on this Policy, BDP 13.

As referred to, Draft Core Strategy 2 contained a much more positive Policy for the encouragement of new employment and we do not know why BDC did not continue this positive approach.

With the proposals for GBSLEP – the Spatial Plan for Recovery and Growth being promoted through the Region - this Local Plan is fundamentally out of step both with the LEP and the government's acknowledged stance on economic recovery related to appropriate Development Plan proposals and Policies aimed at stimulating economic recovery. This Plan is fundamentally out of step with these acknowledged documents and advice and does not reflect properly and positively the known national economic recovery trends now seen.

In fact, the Plan as a whole does not acknowledge any economic upturn or any reasonable approach to meeting the needs of this recovery over the whole length of the Plan period. The BDP does not meet the approach of the South Worcestershire Development Plan where that Plan focuses its approach on economic recovery and these are adjoining authorities. Clearly the Duty To Co-Operate has not meant any joint working and any cross boundary consultations on a credible sub-Regional strategy.

For all of these reasons the current BDP cannot be said to have been robustly and creditably prepared against an appropriate strategy where proper alternatives have not been considered. It is not consistent with its surrounding neighbouring local planning authorities. Any objective assessment or development and Infrastructure requirements would point towards a very substantial increase in employment land provision, positive provision for existing major employers and particularly those in Green Belt locations that have been the subject of the stringent Green Belt constraints of that Policy. Fundamentally BDC have not reasonably and properly consulted with the businesses in Bromsgrove and sought to make proper and appropriate provision for their future both within and beyond the Plan period.

Finally, without an appropriate growth strategy new businesses which need to be attracted into the District will not be able to do so because of the lack of serviced land and accommodation and this cannot possibly meet the government's current strategy for proper sustainable economic growth and recovery.

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)

Policy BDP 13: New Employment Development needs substantial amendment based upon a new credible and robust assessment of proper needs over the Plan period based upon alternative scenarios and the adoption of a proper and reasonable strategy for growth and recovery. Without this fundamental revision to the Plan it cannot possibly be said to be sound at the present time and in our opinion does not meet any of the 3 tests of soundness, ie positively prepared, justified or effective at this time.

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)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

We have set out our submissions in 3 and 4 above which cover the request under this paragraph 6.

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)

We have set out in 4 above the necessary changes required to this Policy and the employment section of this Plan in order for the Plan to be deemed sound.

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 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)

It is most important for our Clients that they be represented at the oral examination to explain or add to their submissions contained in the Background Employment Statement and in these representations because the employment section of the BDP is not sound at this time and needs very substantial amendment.

Signature:



Date: 11th November 2013

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 of Organisation (see Note 8 para 4.1)

CPBigwood Ltd

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

Page:	63 to 64	Paragraph:	8.153 to 8.159	Policy:	BDP 14: Designated Employment
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

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)

Our representations on this Policy should be read in conjunction with our Background Statement on Employment and also our submissions under BDP 13 herewith.

As such, this Policy should be amended to take proper and reasonable account of those substantial businesses in the District and particularly those large employers where the premises lie in the Green Belt and where they all need proper Policy support under this District Plan to allow for consolidation, extension and expansion to properly facilitate their future in compliance with the government's advice on provision for economic recovery in line with the LEP and the GBSLEP apart from the NPPF where there needs to be compliance.

In addition there should be a link between BDP 14 and BDP 13 to allow for large employment allocations to be provided next to existing major employers, particularly where the existing business lies in the Green Belt and that expansion land will need to be taken out of the Green Belt.

Further proper and reasonable provision needs to be made in conjunction with the City of Birmingham to accommodate new employment development adjoining the City boundary, supporting the City's demographic need / expansion and the very considerable need for supporting employment to fulfil provision for South Birmingham.

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)

In conjunction with our representation on BDP 13, substantial amendments need to be made to the employment section of the BDP based upon all of our submissions and representations on the Local Plan at this time. Therefore, we do not believe that the BDP is legally compliant.

5. Do you consider the BDP is sound? (see Note 3)

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

(1) Justified (see Note 4)	<input checked="" type="checkbox"/>
(2) Effective (see Note 5)	<input 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. (Continue on a separate sheet /expand box if necessary)

Based upon our representations above, our representations on BDP 13 as well, the BDP cannot be seen to have been objectively assessed in development and infrastructure terms, it has not been based upon a robust and credible evidence base, which at this time is out of date, and has not been based upon alternative scenarios and a credible strategy which themselves should have been based on the NPPF, present government policies on economic recovery and appropriate growth and in line with the LEP and the GBSLEP as well as being consistent with the neighbouring local planning authorities strategies.

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)

A fundamental change to the Plan should take place based upon all of our submissions on the employment policies consequent upon our replies in paragraphs 3, 4 and 6 above.

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.

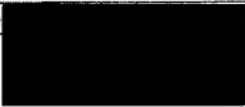
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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 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)

It is vitally important that our various Clients take part in the oral examination for the employment and employment land provision policies of the District Plan to explain and add to their submissions to benefit consideration of the details of this Plan and its soundness.

Signature 	Date: 11 th November 2013
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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)

CPBigwood Ltd

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

Page:	108 to 111	Paragraph:	8.303 to 8.321	Policy:	BDP 23: Water Management
Policies Map:		Other document:			

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? (see Note 2)

Yes: No:

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)

We would request a review of this Policy, particularly in terms of the effect of some of the sub-Policies under BDC 23.1 and their effect upon small businesses and small development schemes where the consequential, financial and economic impacts of those requirements would be considerable and might in fact render the project unviable.

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)

We would request reconsideration of this Policy in the light of our submissions in 3 above. As the country has only recently started to grow economically imposition of some of these requirements will be unacceptable.

5. Do you consider the BDP is sound? (see Note 3)

Yes: No:

Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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)

For the reasons set out in 3 and 4 above we would request reconsideration and revision where necessary to provide assurance to the business community and our Clients.

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)

Please see 6 above and our submissions in 3 and 4 above.

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 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)

Based upon our submissions above it may not be necessary to orally examine Policy BDP 23 depending upon the consequential revisions after review.

Signature: 

Date: 11th November 2013

PSL Research Ltd

**Housing requirements in
Bromsgrove**

Review of evidence base

Philip Leather

November 2013

1 PSL Research Ltd was commissioned in November 2013 by CPBigwood Chartered Surveyors Ltd to review the evidence base supporting Policy BDP5 relating to future housing provision in the Bromsgrove District Plan. According to the Plan, this policy was based largely on the findings of the 2012 Worcestershire Strategic Housing Market Review (WSHMA). WSHMA was recently heavily criticised by the Inspector in the Stage 1 EIP for the South Worcestershire Development Plan and we were tasked with assessing the implications of these criticisms for Bromsgrove.

Background

2 The area administered by Bromsgrove Council includes the major settlement of Bromsgrove and other smaller settlements such as Wythall, Hagley, Rubery, Alvechurch, Barnt Green and Catshill. Importantly however, the district is located adjacent to the major urban centres of Birmingham, Solihull and Dudley and is strongly influenced by their economies and by housing demand arising from this source. In 2011 over 15,000 people commuted daily from Bromsgrove into Birmingham, Sandwell, Dudley and Solihull. The district also receives a substantial level of in migration from adjacent areas of the conurbation. Accordingly the process of planning for housing must take this into account.

Bromsgrove District Plan

3 The Bromsgrove District Plan policy BDP5 proposes a housing target of 7,000 new homes over the period 2011-2030 to meet the needs of the district. Sites for approximately 4,600 homes are set out in the Plan (para 8.22). The remaining 2,400 homes will be accommodated on sites to be identified as part of a future review of Green Belt Land in the district which will be completed 'in advance of 2023' (para 8.28). An additional 3,400 homes will be provided on land within the district but adjoining Redditch to contribute to meeting the needs of that district. The Plan acknowledges that it may also be necessary in the future for Bromsgrove to assist the City of Birmingham in meeting its housing requirements through the release of land for housing, but as the scale of assistance needed is not yet apparent, the Plan suggests that this issue will be dealt with at a later stage through a Green Belt Review (para 8.25).

The evidence base for housing: WSHMA

4 The target of 7,000 homes to meet the needs of Bromsgrove over the period 2011-2030 is derived from the 2012 Worcestershire Strategic Housing Market Assessment (WSHMA)¹. This study was commissioned by the six Worcestershire district local authorities to provide up to date evidence on the housing stock in their areas, the housing market, and the future requirements for market housing, affordable housing and the needs of specific groups of people.

¹ GVA Grimley and Edge Analytics (2012) *Worcestershire Strategic Housing Market Assessment 2012*, available at http://www.swdevelopmentplan.org/?page_id=3602.

5 The future requirement for housing was examined through five Core and two Sensitivity Scenarios of housing requirements each based on different approaches and assumptions. Core Scenarios 1-3 were based on assumptions relating to demographic factors – future population growth, migration to and from other areas, and rates of household formation. The Scenarios were derived from ONS 2008-based Sub-National Population Projections and Department for Communities and Local Government (DCLG) household projections. Core Scenario 3 suggested a requirement for 6,980 additional dwellings (370 per annum) in Bromsgrove over the 2011-2030 period² after taking account of completions from 2006-2011. Policy BDP5 rounds these estimates to 7,000.

6 Core Scenario 4 and Sensitivity Scenario 2 were derived differently. Core Scenario 4 was based on forecast employment growth in Worcestershire. By applying assumptions about the proportion of the population who will be of working age in the future and who will be economically active (working or available for work), the scenario derived the population and number of households required to supply the necessary labour force in Worcestershire, and from this obtained the number of additional dwellings required to accommodate the resulting in-migrants. Sensitivity Scenario 2 was a variant which assumed that in the future, more people aged 60 and over would participate in the labour force. This reduced the new dwelling requirement by some 20% over that suggested by Core Scenario 4. After taking account of completions, Sensitivity Scenario 2 suggested a requirement for 6,780 additional dwellings (360 per annum) in Bromsgrove over the 2011-2030 period.

7 On the basis of the estimates from Core Scenario 3 and Sensitivity Scenario 2, policy BDP5 proposes a requirement for 7,000 additional dwellings to meet the housing requirements of Bromsgrove over the 2011-2030 period.

Flaws in the WSHMA

8 The problem with this approach is that there are a number of serious weaknesses in the WSHMA which undermine its usefulness as the basis for estimates of future dwelling requirements in Bromsgrove. Hence the housing evidence base for the plan is not robust.

9 these problems were identified by objectors, they have been highlighted and officially confirmed in the recent Inspector's report on the South Worcester Development Plan EIP Stage 1³. On the basis of these flaws, the Inspector has required the three Councils who prepared the South Worcestershire Plan to completely rework the WSHMA findings. The Inspector makes it clear that a much higher level of housing is likely to be required – in other words the WSHMA underestimates future housing requirements. **The most important criticisms made by the SWDP Inspector apply equally to the estimates prepared for**

² See *Worcestershire Strategic Housing Market Assessment Appendix 2 – Bromsgrove SHMA Overview Report*, Figure 3.13 p 37.

³ *Stage 1 of the Examination of the South Worcestershire Development Plan, Inspector's Interim Conclusions on the Stage 1 Matters*, available at <http://www.swdevelopmentplan.org>.

Bromsgrove, and suggest the need for a similar increase in future housing provision. The main flaws in the WSHMA and policy BDP5 are as follows.

10 **Firstly**, in Core Scenario 3 the WSHMA authors adjusted DCLG's official household projections downwards by assuming a lower rate of household formation. This was based on evidence from Council Tax records. The Inspector concluded that this approach was flawed because it introduced errors into the household projections, since Council Tax records are based on dwellings rather than households (paras 10-11 of his report). The adjustment made also assumed that reduced rates of household formation during the 2007-11 economic and financial crises in the UK would persist through to 2030, resulting in a likely under-estimate of dwelling requirements.

11 **Secondly**, the WSHMA assumed lower rates of migration than ONS projected forward to 2030. This assumption was derived from a single year of migration data relating to 2008-09 when circumstances in the housing market and labour markets were highly unusual as a result of the mortgage famine, falling house prices and economic uncertainty. It is most unlikely that these circumstances will persist until 2030. The processes which have driven migration into the area over several decades are likely to resume as soon as the market recovers. This compounds the extent to which Core Scenario 3 under-estimates future housing requirements.

12 **Thirdly**, the Inspector strongly criticised the employment projection used as the basis for both Core Scenario 4 and Sensitivity Scenario 2, which were produced in 2009 for Advantage West Midlands. These now outdated projections suggested a reduction in employment over the 2010-2020 period, whereas all other more recent projections presented to the EIP suggested increases. There was also an unexplained anomaly in the projection relating to agricultural employment. The Inspector has required the Councils to produce updated forecasts based on more up-to-date assumptions about economic recovery and employment growth. This will lead to a significant increase in the demand for labour and hence in the requirement for new dwellings. This criticism applies equally to Core Scenario 4 as applied in Bromsgrove as the same outdated forecast was used. Given the importance attached by government to the encouragement of economic growth and the prominence of economic growth objectives in the BDP, this is a very serious weakness. Effectively, by failing to provide housing on the scale required, the BDP will create labour shortages in Bromsgrove (thus potentially deterring employers from expanding or locating there), or will create higher and more unsustainable levels of commuting from adjacent areas. Both of these are undesirable outcomes.

13 **Fourthly**, the South Worcestershire Inspector found 'a lack of convincing evidence to support the assumed increases in older people's economic participation rates' which provide the basis for Sensitivity Scenario 2 and lead to a large reduction in future housing requirements (see para 11 of his report). By assuming that many more old people would remain in employment beyond retirement age, Sensitivity Scenario 2 reduces the need for

inward migration into Bromsgrove to take up employment, and hence the need for new housing. At the Inspector's request, the WSHMA authors have recently produced further scenarios based on alternative assumptions about future participation by older people in the labour force⁴. All of these produced much lower estimates of labour force participation by older people, and hence increased the requirement for future housing. Again this applies equally to Sensitivity Scenario 2 as applied in Bromsgrove.

14 The South Worcestershire Inspector did not specify a figure for future housing requirements after these flaws in the SWHMA had been taken into account, other than that 'the objectively-assessed housing need figure for the Plan period is likely to be substantially higher' (para 49). Some alternative estimates referred to in the Inspector's report suggested an increase of 25% or more over the Plan proposal. **In Bromsgrove, this would suggest an increase in the housing requirement to approximately 9,000 additional dwellings. Deriving a more exact figure would need further work, as specified by the SWDP Inspector. It would be sensible for Bromsgrove to commission this work as part of the revisions to WSHMA to meet the Inspector's requirements. This is a matter for the planning authority to address.**

15 As the three local authorities in South Worcestershire have been required to produce alternative estimates of housing requirements taking account of the flaws identified by the Inspector, it is essential that these adjustments are applied across the remainder of the county including Bromsgrove, since the same weaknesses apply there. The weaknesses identified by the South Worcestershire Inspector show beyond doubt that the WSHMA does not provide a sound evidence base for the level of housing provision set out in BDP5.

16 **Rather they show clearly that BDP5 will significantly fail to provide sufficient housing to meet future requirements.** It is of particular concern that this level of under-provision is likely to impact adversely on the economic growth of the district. If economic growth is achieved on the scale envisaged, the shortage of housing will place further pressure on house prices and private rents, squeezing out lower income households and leading to labour shortages and increased commuting. This might in turn discourage employers and undermine the economic growth objectives of the plan. There seems little point in proceeding further with policy BDP5 until the findings of WSHMA are reviewed and revised.

Land supply

17 BDP5 makes it clear that insufficient land has been identified in the district to meet the assumed requirement for 7,000 additional dwellings, to say nothing of the further increase in requirements which a review of WSHMA will inevitably identify. The Plan proposes a review of the Green Belt as the only way to identify additional supply but

⁴ These can be found in the online Documents Library of the SWDP EIP website.

indicates that this will be completed 'prior to 2023' (BDP3.1). At the very latest, the Council would need to have completed this study, identified sites, and brought the Plan through the Review process by 2018 in order to maintain a five year supply of land after that date (together with a buffer). As changes to Green Belt status are likely to be controversial and to require careful consideration and wide consultation, a long timescale is likely to be required for the Review Process. This suggests that the Green Belt Review process should commence at the earliest possible date. There seems no reason to delay this review. Rather, the review would give an early indication of the extent to which it will be feasible to make amendments to Green Belt to meet Bromsgrove's requirements and the potential future requirements arising from the inability of the City of Birmingham to provide for its future needs within its boundaries, as well as a range of needs beyond 2030.

The duty to cooperate with Birmingham

18 As the Green Belt review proceeds, it is likely that the requirements arising from the duty to cooperate with Birmingham will emerge and these can then inform the review. The extent to which housing requirements in Birmingham will need to be met in Bromsgrove is not yet clear. In evidence to the South Worcestershire enquiry, Birmingham City Council indicated that they anticipated that assistance from authorities in Worcestershire would be required, but that the majority of demand would fall on areas adjacent to the conurbation. This suggests that a significant level of demand will fall to be met in areas in Bromsgrove.

Housing for older people

19 Policy BDP10 refers to the impact of the ageing process on the requirement for housing for older people in the district over the 2011-2030 period. ONS 2010-based sub-national population projections show an increase of 78% (from 9,100 to 16,200) in the number of people aged 75 or over in Bromsgrove between 2011 and 2030, and of 129% (from 2,700 to 6,200) in the number of people aged 85 and over. The *increase* in those aged 75 or more amounts to at least 4,700 households, or *two thirds of all new housing proposed under BDP5*.

20 The Plan's response to this is a 'dramatic change in house building in the District towards providing many more two bed homes' (para 8.123), although it is not clear what the evidence is to support the assertion that this is the type of housing demanded by older people. But at the same time the Plan proposes 'the provision of housing for the elderly and for people with special needs, where appropriate *whilst avoiding an undue concentration in any location*' (policy BDP10.1, our emphasis). Given that older peoples' requirements represent such a high proportion of overall needs, and that 45% of proposed new sites for housing fall within the town of Bromsgrove itself, it will not be practical to avoid concentrations of housing for older people without the identification of a much wider range of sites across the plan area. In addition to Bromsgrove, sites for both general housing and specialised forms of provision for older people are needed in all of the significant

settlements across the district. Rather than relying on the market to bring forward sites, the Council should be actively looking for appropriate sites and for providers. If these are not identified, it will become increasingly difficult for older people seeking specialised housing, or those looking to downsize to more manageable accommodation, to find housing in the community in which they live. Many, probably most, older people seeking to move to more appropriate housing look to move locally so as to maintain their links to friends, relatives and support networks. This again supports the case for an early review of Green Belt.

21 This is not only an issue for older people, but also one which impacts on Bromsgrove's economic future. Providing adequate housing for older people and supporting moves to more appropriate housing will release dwellings for younger people seeking to move into the area to take up employment.

Conclusions

22 A number of serious weaknesses in the methodology of the Worcestershire SHMA have been officially recognised in the Inspector's report on the Stage 1 EIP for the South Worcestershire Development Plan. The Worcestershire SHMA was used as the chief evidence base for the housing provision target in Policy BDP5 in the Bromsgrove District Plan Proposed Submission Version and several significant components of the SHMA criticised by the Inspector apply equally to Bromsgrove. It is thus essential for Policy BDP5 to be revised to take account of these points before Public Enquiry. The changes required to WSMHA will result in an increase in the level of future housing requirements across the whole county, including in Bromsgrove. The precise level of increase cannot be determined without significant further work, but are likely to be substantial, increasing the required provision in BDP5 from 7,000 to 9,000.

23 Other features of BDP5 raise concerns. In particular, there is a need to institute a review of Green Belt immediately in order to identify sites required for housing development in the second half of the plan period and to avoid a shortfall.

24 The shortfall of provision in BDP5 also has implications for BDP10 relating to housing for older people. ONS population projections and assumptions relating to household size suggest an increase of 4,700 in the number of households living in the district over the 2011-30 period representing about two thirds of all new housing proposed under BDP5. The concentration of new housing in sites in Bromsgrove proposed under BDP5 will limit the Council's ability to support the provision of specialised accommodation for older people across the district in the diversity of locations where it is required. A revision to this policy is therefore required permitting the use of additional sites for older people's housing in a much larger number of settlements in the area in order to meet local need.

