

West Midlands Joint Committee

WMJC Secretariat

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Stephen Hughes - Secretary



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11 November 2013

The Strategic Planning Team
Planning and Regeneration
The Council House
Burcot Lane
Bromsgrove
Worcestershire
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Dear Sir/Madam

Bromsgrove District Council – Proposed Submission Local Plan 2011 - 30

Thank you for the opportunity to comment on the above document.

The West Midlands Joint Committee (WMJC) was established by the seven District Councils of the County of West Midlands on 24 July 1985. The Constitution of the WMJC has been updated to reflect changes in law primarily brought about by the Local Government Act 2000. In terms of its functions, the WMJC is responsible for co-ordination and joint action on issues of mutual interest, which include strategic planning and the Duty to Cooperate.

General

As Bromsgrove District Council is aware, work being taken forward through the GBSLEP suggests that there is an emerging shortfall in housing provision in Birmingham City Council's administrative area of around 30,000, which potentially has implications for neighbouring local planning authorities. The GBSLEP has recently commissioned a Strategic Housing Needs Study to examine this further and the four Black Country Authorities have also expressed an interest in being participants. Until the outcome of this work is available, it is not possible to determine the extent of any specific housing shortfall which any neighbouring local planning authority could be requested to accommodate.

Scale and Location of Growth

The broad approach set out in the Bromsgrove Proposed Submission Local Plan is supported. The strategic land allocations to meet Bromsgrove's requirements are

either former Areas of Development Restraint, which have been identified as potential locations to meet future needs and / or have planning consent.

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The housing requirement set out in the plan broadly aligns with the 2008 based household projections and the Policy BDP4 acknowledges the emerging issue in terms of potentially having to accommodate further growth from the conurbation, dependent upon the outcome of the aforementioned study. In response to this, the plan commits to a review of Green Belt *'in advance of 2023'*. Whilst conceivably this could occur at any point before 2023, it is suggested that the date of any review is determined by available evidence, including the outcome of the GBSLEP Strategic Housing Needs Study. It is requested that the policy is amended to reflect this.

Elsewhere, Policy BDP4 states that the scope of any Green Belt review should be led by the approach set out in the Plan's settlement hierarchy. As it is acknowledged that any Green Belt review may have to meet further needs of the conurbation, it is suggested that this may be overly prescriptive. It is requested that this reference to the established settlement hierarchy in Policy BDP4 is removed.

Elsewhere, the Plan proposes to meet some of Redditch's development need that cannot be accommodated within its boundaries and this is welcomed.

For the avoidance of doubt, it is considered that these matters can be addressed through minor amendments to the Plan prior to submission for examination and that they raise no strategic process matters via the Duty to Cooperate.

Other issues

The ongoing commitment to working with Birmingham City Council with regard to the redevelopment of Longbridge is supported. Similarly, the references in the Plan that support improved accessibility between Bromsgrove and the conurbation, particularly through enhanced rail capacity are welcomed.

If you have any queries please direct them to Andy Donnelly (0121) 675 3853 andrew.donnelly@birmingham.gov.uk in the first instance.

Yours sincerely

