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

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, Oakland International Ltd, we have enclosed a Background Business Statement and an Employment Statement.

For the reasons set out in these documents and the representations to the Policies set out herewith, we do not believe that the District Plan is legally compliant because it is not sound, as required, neither have Bromsgrove DC complied with the legal Duty to Co-Operate and neither has the Plan properly reflected either the Worcestershire LEP or the Greater Birmingham and Solihull LEP within its formulation, as required.

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)**

Please see further representations on the relevant Policies herewith.

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

Yes:☐	No:x

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 and later in the representations enclosed herewith the BDP is 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)**

Consequential changes based upon 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	☐
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 landholdings in Bromsgrove's administrative area are vitally important to protect along with their proposals for expansion and as a result based upon the further representations to the related Policies it is important that they appear to provide further information and justification of their submissions contained herewith to preserve their existing business and make appropriate provision for future consolidation, extension and expansion both within their existing landholding and on the adjoining landholdings within the Plan period.

Signature: [redacted]	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: ☐	No: x

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 employment land and growth within the Plan period based upon the existing District Profile and the required future economic growth.

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 paragraphs 3 above and 6 below.

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

Yes: ☐	No: x

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 noted that the District Plan gives very little factual information on the existing businesses within the District, their present trading and their prospects / proposals for future growth within the Plan period. There are major County businesses within this District where there must be a requirement to provide for their future growth in order both to retain that existing business and also allow it proper growth with all the consequential benefits that would flow from that. The profile lacks that in-depth consideration and any proper input to

the assessment of growth needed to comply with the government's requirement to plan for future growth and prosperity given the indication that we are entering a better economic cycle nationally.

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 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 exam ination.*

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 landholdings in Bromsgrove's administrative area are vitally important to protect along with their proposals for expansion and as a result based upon the further representations to the related Policies it is important that they appear to provide further information and justification of their submissions contained herewith to preserve their existing business and make appropriate provision for future consolidation, extension and expansion both within their existing landholding and on the adjoining landholdings within the Plan period.

Signature [redacted]	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:x

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:x

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 must embrace the limited Vision for Bromsgrove District as provided in the BDP in terms of sustainability and economic development. However this Vision is severely limited in extent, is not based upon credible alternatives for future prosperity or a proper and rational strategy as required by present government advice, requiring a proper economic basis for growth and prosperity for the District throughout the whole Plan period and reflected through the Worcestershire LEP and the Greater Birmingham and Solihull LEP growth scenarios.

As reflected in the attached Statements and the various submissions on the related Policies herewith, the failure to have a proper Vision for growth and prosperity underlies the basic reason why the Bromsgrove District Plan must, in almost all cases related to employment and employment land provision, be found to be unsound at this time.

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	☐
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 landholdings in Bromsgrove's administrative area are vitally important to protect along with their proposals for expansion and as a result based upon the further representations to the related Policies it is important that they appear to provide further information and justification of their submissions contained herewith to preserve their existing business and make appropriate provision for future consolidation, extension and expansion both within their existing landholding and on the adjoining landholdings within the Plan period.

Signature: [redacted]	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:x

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)

Given our submissions that the Vision for the District in this Plan is unsound for the reasons given, it therefore follows that the Strategic Objectives need to be re-written to accord with a proper and objective strategy for economic growth.

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. More importantly, unless the Strategic Objectives underpin a proper, revised economic growth vision the Plan will continue to be unsound.

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:☐	No:x

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. As recorded in 3 and 6 above the Strategic Objectives need to be properly reviewed consistent with a revised Vision and proposals for proper and reasonable economic growth within the District as a whole.

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	☐
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 landholdings in Bromsgrove's administrative area are vitally important to protect along with their proposals for expansion and as a result based upon the further representations to the related Policies it is important that they appear to provide further information and justification of their submissions contained herewith to preserve their existing business and make appropriate provision for future consolidation, extension and expansion both within their existing landholding and on the adjoining landholdings within the Plan period.

Signature: [redacted]	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:	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:x

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 Business and Employment Statements attached herewith and our contention that under Policy BDP3 future housing and employment growth is substantially under-provided for the District within the Plan period for the reasons given in those Statements. There is a correlation between housing and employment growth in that most planning authorities in Development Plan making wish to try to seek comparability between two uses and their growth.

In addition we have reserved the position to present a further Employment Growth Statement once our sub consultants have reported back to us, 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.

What is clear is that the employment strategy is wrongly formulated at this time and in our view there needs to be substantial additional employment land provision to take account of the government's policy for economic growth and recovery. In addition, Bromsgrove should have policies that support the policies and intentions of their adjoining local planning authorities because they are out of synchronisation with the presently submitted District Plan.

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:☐	No:X

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

(1) Justified **(see Note 4)**	☐
(2) Effective **(see Note 5)**	X
(3) Consistent with national policy **(see Note 6)**	☐
(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 basic substantial under-provision of employment and future employment land provision at this particular time in all the circumstances for all the submissions made in these representations and the attached statements mean that the Plan, as submitted, is 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.

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 landholdings in Bromsgrove's administrative area are vitally important to protect along with their proposals for expansion and as a result based upon the further representations to the related Policies it is important that they appear to provide further information and justification of their submissions contained herewith to preserve their existing business and make appropriate provision for future consolidation, extension and expansion both within their existing landholding and on the adjoining landholdings within the Plan period.

Signature: [redacted]	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:☐	No:X

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 there should be amendments to allow for consolidation, expansion and extension to existing commercial operations in the Green Belt and very particularly for those as accepted major County employers. This is particularly the case for our Clients, Oakland International Ltd.

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:☐	No:X

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	☐
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 landholdings in Bromsgrove's administrative area are vitally important to protect along with their proposals for expansion and as a result based upon the further representations to the related Policies it is important that they appear to provide further information and justification of their submissions contained herewith to preserve their existing business and make appropriate provision for future consolidation, extension and expansion both within their existing landholding and on the adjoining landholdings within the Plan period.

Signature: [redacted]	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:	**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:x

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 creditable 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:☐	No:x

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	☐
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)

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: [redacted]	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:	**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:x

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:☐	No:x

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)

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	☐
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)

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: [redacted]	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:	**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:x

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:x

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	☐
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)

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

Signature: [redacted]	Date: **11th November 2013**

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BROMSGROVE LOCAL PLAN
PROPOSED SUBMISSION VERSION

BACKGROUND BUSINESS STATEMENT
OAKLAND INTERNATIONAL LTD

2011-2030

1. BACKGROUND

1.1. Oakland International Ltd are a British domiciled European company, started in 1998, operating principally in the food industry presently providing temperature controlled food storage facilities on their site at Beoley. This includes ambient, chilled and cold storage, the latter being for perishable goods. They are located fronting Seafield Lane, Beoley, Redditch, B98 9DP. Opposite their frontage are Attwells Ltd at Seafield Farm, Seafield Lane, B98. At the present time they employ 213 full-time employees and they are looking to expand those numbers to about 350 within the next two years. There is of course considerable secondary and tertiary employment generated by Oakland International.

1.2. The above statement was set out in the submitted representations that we made on behalf of Oakland in April 2011 in respect of BDC's LDF Draft Core Strategy 2 Policies and a copy of that statement is annexed to the present representations.

1.3. In the Appeal Decision (APP/P1805/A/13/2196035), a copy of which is annexed to these representations, the Planning Inspector recorded the following statement:

"Oakland International is a successful 'case consolidation' and distribution business. It offers a 'consolidation' service to several small and local food producers an manufacturers combining their products on pallets for distribution by large articulated vehicles. The business does not operate its own haulage fleet, but provides storage, handling and organizational services between mainly local producers and the fleets of HGVs operated by supermarket chains, retailers and others, thereby providing cost and efficiency savings within the distribution network while reducing road miles and road traffic. It has grown (not quite) from a poultry shed in the late 1990's to a complex of large warehouses, 'chiller units' and a cold store providing some 12,600m^2 of floor space, employing 180 people and achieving an annual turnover of about £24m. It lies in the Green Belt amidst the hedged fields and small scattered woods of Worcestershire."

1.4. We have reproduced the above information because it is vital background material about the company, its operations and the base upon which it makes its proposals for future growth both on its existing site and on the adjoining land.

1.5. It is vitally important to note that the Oakland remain committed to the scheme outlined in the statement and information contained in our representations to the LDF Draft Core Strategy 2. However, the detailed statement, together with the attached Masterplan, were not taken into account whatsoever in the production of the present Bromsgrove Local Plan.

1.6. On this point alone, where you have a major employer in Bromsgrove (currently employing 213 staff), the Local Plan must be shown to be unsound because of its failure to consult properly with its major businesses and reflect that in a proper and sound Development Plan.

1.7. We note that the Inspector, in paragraph 8 of the above referred to Appeal Decision, reflects upon both the preparation of a new Local Plan but also the major proposal by Oakland to "... *create a food science and research business park entailing a substantial expansion of Oakland International, together with provision for food processing operations and research (involving links to local Universities and Colleges).*".

1.8. That proposal on adjoining land required the removal of land from the Green Belt and, as recorded by the Inspector, "... *the possibility of establishing up to 100,000 sq m of office, processing, distribution and research units employing some 2,000 people and served by*

new access directly onto the A435; a proposal strongly supported by the Worcestershire LEP".

1.9. The Inspector properly records that *"... along with the outcome of the joint consultation ..."* this *"... will need to be resolved as the Local Plan emerges;".*

1.10. We must therefore record our disbelief on behalf of our Clients that BDC have failed throughout the preparation of this Local Plan to acknowledge our Clients, their business, their business aspirations or their future proposals. This is an absolutely major failing and goes to the very heart of Development Plan preparation and the need for proper consultation, proper consideration, formulating proper strategies, working within current government guidelines and particularly at a time when central government is promoting Economic growth in order to re-stimulate the economy and you find BDC taking no proper account of its businesses, of its LEP or of their unequivocal support for this major employer, business and wealth generator in its area.

1.11. The above referred to Inspector's Report is vitally supportive in his paragraph 18 for the company and its role. He reflects upon the likely increase from the Appeal proposal of another 30 full-time jobs as well as job security for the existing workforce. There is very considerable support in paragraph 21 in particularly noting the close working relationship between Oakland and the LEP.

1.12. The Inspector records most importantly in paragraph 21 as follows *"... the business is also described as innovative and as one of the key employers within the County.".* So, not just the District but the County as a whole. He goes on *"... the crucial role of the firm in the local economy and in the local labour market is thus confirmed, so that (in accordance with the Framework) the proposal should warrant support.".* Frankly, extremely high praise indeed and BDC were aware of all of that information but frankly gave it no credence whatsoever.

1.13. Finally, we would draw your attention to paragraph 22 where the Inspector records substantial business attributes for the company's various policies and where he finds those to be exemplary and yet, still, BDC do not acknowledge Oakland or their future.

2. SUMMARY

2.1. We have set out in some detail above this vitally important background material, most of which has been provided by a government Inspector after consideration of submissions at a Planning Appeal hearing and is therefore a matter of public record.

2.2. In the context of an emerging Development Plan, given all the government advice in the preparation of those documents, all the advice in the NPPF, the current economic advice and stance by central government, it is frankly unbelievable that BDC have not seen fit to assist this major County business.

2.3. It leaves you to conclude that if this is the case for Oakland International at their important level then there must have been failure to properly consult all other businesses in their District or to have proper, positive and meaningful discussions with the LEP to input their advice and proposals in this Local Plan preparation.

2.4. It is not surprising therefore that we must conclude that there has been a very substantial failure in the preparation of this Local Plan, that it has not been objectively prepared and cannot therefore be sound at this time as required by town planning legislation.

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BROMSGROVE LOCAL PLAN
PROPOSED SUBMISSION VERSION

BACKGROUND STATEMENT
EMPLOYMENT AND EMPLOYMENT LAND PROVISION

2011-2030

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 and in particular our Clients, Oakland International Ltd. We know that they have taken an active part in the LEP drawing specific attention to their major business at Beoley, its development to date and its

proposals for the future. These future proposals are considerable over the Plan period and the consequential employment generation is significant for the District both in primary employment but also in the secondary and tertiary employment and wealth benefits for the District which would flow.

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. With regard to Policy BDP13: New Employment Development, we make the following comments.

1.12. In terms of Table 4, as such, they are the absolute minima needed to merely accommodate current and forecast activity.

1.13. In reality, a much larger amount of land will need to be made available to allow for losses of exisiting employment sites to other uses during the plan period as well as to ensure a balanced portfolio of employment land in terms of sufficient choice of available sites and locations over the period up to 2030.

1.14. The figures generated by the forecasts also exclude any requirement to meet the needs of Redditch residents and specifically exclude the 30 ha of land identified in the currently adopted Local Plan (referred to in section 3.52 of that report).

1.15. 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.

1.16. 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.

1.17. 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.

1.18. 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?

1.19. 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.

1.20. 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.

1.21. We reserve the right to submit an additional Employment Review Statement following further detailed analysis of the background documents by our consultants.

[redacted]

November 2013