


B061



Subject: Bromsgrove District Plan Proposed Submission Version 2011-2030 Representations re Cofton Hackett
Attachments: Part A.pdf; Policy BDP Page 25.pdf; Para 1.14.pdf; Para 3.1.pdf; Para 5.1.pdf; Para 8.31.pdf; Policy BDP3.pdf; Policy BDP4.pdf; Policy BDP10 & Para 8.127.pdf

Dear team

I attach representations in connection with the 'Bromsgrove District Plan Proposed Submission Version 2011-2030' on behalf of our client Brierley Properties Ltd .


They are:-

- Part A
- Paragraph 1.14
- Paragraph 3.1
- Paragraph 5.1
- Paragraph 8.31
- Policy BDP3
- Policy BDP4
- Policy BDP4 Page 25
- Policy BDP10 & Paragraph 8.127

Miranda Rogers would be pleased to discuss them with you should it be helpful.

Please could you confirm receipt of this email.

Regards



Stansgate Planning is the trading name of Stansgate Planning Consultants Limited registered in England and Wales Registration Number 08010392

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)

Brierley Properties Ltd

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

Page: 25	Paragraph:	Policy: BDP4
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)

[Empty box for response to question 3]

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)

[Empty box for response to question 4]

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

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

There is significant evidence within the Plan regarding the need to provide accommodation for the aging population and Policy BDP10 supports the erection of housing specifically for the elderly. Paragraph 8.127 indicates that there was a desire from developers to provide some of this accommodation outside defined settlements but that this was rejected on the basis that it would be contrary to the Green Belt policies. This has led to Policy BDP4.4 which does not allow the development of care facilities for the elderly within the Green Belt. Given the level of need this is not justified and thus is unsound.

The NPPF does not generally permit accommodation to meet the needs of the elderly in the Green Belt (although an argument of 'very special circumstances' could be put forward). However policies which are fully justified, even where they do not accord with the NPPF, are acceptable. In this case, given the significant need arising from an aging population, the limited amount of space available within existing settlements to provide appropriate accommodation, and the amount of the District washed over by the Green Belt (noting also the tight boundaries drawn around inset villages), Policy BDP4.4 should contain a further form of appropriate development which would permit the provision of accommodation of the elderly in Green Belt location (close to existing settlements) where it is to meet identified needs. This would allow the development of purpose built 'villages' for the elderly which are now seen as a positive manner in which to meet the needs of the aging population, and which cannot otherwise be accommodated.

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)

Policy BDP.4 should include an additional exception "the development of housing designed specifically to meet the needs of older residents where there is an identified need".

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 checked="" type="checkbox"/>
Yes, I wish to participate at the oral examination	<input 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)

Signature:



Date:

11/11/13

Part B (see Note 1 and Note 8 para 4.2)**Please use a separate Part B form for each representation you wish to make**

Name or Organisation (see Note 8 para 4.1)

Brierley Properties Ltd

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

Page: 4	Paragraph: 1.14	Policy:
Policies Map:	Other document:	

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

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

Yes: 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)

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

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

Yes: 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)	<input type="checkbox"/>
(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)

Paragraph 1.14 refers to the Duty to Co-operate between Bromsgrove District and Birmingham City Councils. Whilst the paragraph states that there have been discussions between the two authorities, and that these discussions are continuing, the Bromsgrove Plan does not seem to acknowledge the latest position in Birmingham City. This is also apparent from reading the separate Duty to Co-operate document which is referred to in paragraph 1.16.

The latest information coming from Birmingham City Council is that of their overall requirement for 70,000 houses in their Plan period they can only accommodate in the region of 43,000. The remainder will have to be accommodated in the surrounding districts. Whilst the Bromsgrove Plan indicates it may make provision this is not sufficient at this point in time and may well leave Birmingham unable to meet its housing needs, even in the earlier part of the Plan period.

In the light of this the Bromsgrove Plan is not sound because it is not:
Justified – The failure to make appropriate provision to meet the needs arising from Birmingham City is not the correct strategy. The correct strategy would be to make at least some provision at this point in time;
Effective – The Plan does not contain a coherent strategy for dealing with the housing needs arising from Birmingham City. It does not indicate how the additional housing needs will be met within the District boundaries;
Positively Prepared – The Plan does not meet the unmet requirements from the neighbouring authority of Birmingham City.

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 Bromsgrove Plan should accept that it is going to have to accommodate additional housing to meet the needs arising from within the Birmingham City area. It should specify how it intends to meet those needs, recognising that the provision is most likely to be on Green Belt land to the north of the District. It would be appropriate to identify the most likely areas for allocation, although it is recognised that this may best be undertaken as part of a separate Green Belt Review.


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 checked="" type="checkbox"/>
Yes, I wish to participate at the oral examination	<input 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)

Signature:  Date: 11/11/13

Part B (see Note 1 and Note 8 para 4.2)**Please use a separate Part B form for each representation you wish to make**

Name or Organisation (see Note 8 para 4.1)

Brierley Properties Ltd

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

Page: 11	Paragraph: 3.1	Policy:
Policies Map:	Other document:	

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

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

Yes: X

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)

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

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

Yes: X

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

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Items 3 and 4 are particularly important and we are pleased to see that the Council is recognising the need to meet the housing needs of the District for the whole of the Plan period, and also to ensure that the housing is provided meets the needs of the entire population, with particular reference to housing for the elderly. Notwithstanding this we remain concerned that the Plan fails to meet either of these key challenges. Further details of this are set out in separate comments.

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 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 checked="" type="checkbox"/>
Yes, I wish to participate at the oral examination	<input 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)

Signature:  Date: 11/11/13

Part B (see Note 1 and Note 8 para 4.2)

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

Name or Organisation (see Note 8 para 4.1)

Brierley Properties Ltd

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

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

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

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

Yes: 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)

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

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

Yes: 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 type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input type="checkbox"/>
(4) Positively prepared (see Note 7)	<input type="checkbox"/>

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Strategic objective S04, to provide a range of housing types to meet the needs of the local population including housing for the elderly, is strongly supported. Failure to meet the needs of all, and more particularly the needs of the older population, will result in many of the other objectives being left unmet.

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 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 checked="" type="checkbox"/>
Yes, I wish to participate at the oral examination	<input 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)

Signature:



Date:

11/11/13

Part B (see Note 1 and Note 8 para 4.2)**Please use a separate Part B form for each representation you wish to make**

Name or Organisation (see Note 8 para 4.1)

Brierley Properties Ltd

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

Page: 24	Paragraph: 8.31	Policy:
Policies Map:	Other document:	

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

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

Yes: X	No: <input type="checkbox"/>
--------	------------------------------

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)

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

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

Yes: X	No: <input type="checkbox"/>
--------	------------------------------

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

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

We support the recognition in this paragraph that any housing needs arising from the Birmingham City Area will need to be met on the northern edge of the District, and that this can only be accommodated following a Green Belt Review. We further support the recognition that that Green Belt review should consider all land along the northern boundary of the District where it adjoins the West Midlands conurbation. It would be inappropriate at this point in time, in advance of a full and comprehensive review, to discount any specific areas.

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 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 checked="" type="checkbox"/>
Yes, I wish to participate at the oral examination	<input 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)

Signature:



Date:

10/11/15

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)

Brierley Properties Ltd

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

Page: 22	Paragraph:	Policy: BDP3
Policies Map:	Other document:	

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

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

Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
--	------------------------------

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)

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

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

Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
-------------------------------	---

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

(1) Justified (see Note 4)	X
(2) Effective (see Note 5)	<input type="checkbox"/>
(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 Bromsgrove Development Plan has been drafted on the premise that it is acceptable to provide sufficient housing land to meet identified housing needs for only part of the Plan period. This may be a good way to get the Development Plan adopted, but it does not adequately meet the needs of the District either now or in the future. The Plan is unsound because it is not:

Justified – There is no evidence to explain why it is acceptable to meet housing needs for what will effectively be a period of considerably less than 10 years following the adoption of the Plan. Failure to meet the full housing needs of the District, and particularly those of the more rural areas (inevitably a result of not changing Green Belt boundaries at the current time), will mean there is no certainty and, perhaps more importantly, insufficient housing to accommodate residents. This will have a detrimental impact on the economy and on the sustainability of the more rural parts of the District (because it is those rural areas which will not be able to accommodate new housing until after 2023)

Consistent with National Policy – Paragraph 157 of the National Planning Policy Framework requires Local Plans to be drawn up over an appropriate time scale, preferably a 15 year time horizon to take account of longer term requirements. The Bromsgrove Plan will provide housing for less than 10 years, which is contrary to the NPPF.

Positively Prepared – The Plan does not meet the objectively assessed development and infrastructure requirements of Bromsgrove District. The housing requirements are only met to 2023, a clear failing. The Plan similarly does not meet the development needs emerging from Birmingham City.

However if the Inspector should conclude it is appropriate to make allocations only to meet the housing needs until 2023 we support the recognition that the additional housing requirement can only be met through a review of the Green Belt, which is to be complete by 2023.

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)

Allocations should be made to meet the housing requirement for the whole Plan period. This would require a full review of the Green Belt and the making of further site allocations. Additional rounds of consultation would be necessary, giving the opportunity firstly for new sites to be put forward for development and secondly to seek comments on those sites preferred by the Council for development.

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 checked="" type="checkbox"/>
Yes, I wish to participate at the oral examination	<input 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)

Signature		Date:	11/11/13
-----------	--	-------	----------

Part B (see Note 1 and Note 8 para 4.2)**Please use a separate Part B form for each representation you wish to make**

Name or Organisation (see Note 8 para 4.1)

Brierley Properties Ltd

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

Page: 25	Paragraph:	Policy: BDP4
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)

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

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

Yes: 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 type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input type="checkbox"/>
(4) Positively prepared (see Note 7)	<input type="checkbox"/>

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

We have made comments in respect of Policy BDP3 that we find the proposal to allocate only sufficient housing land to meet the identified needs of the District to 2023 unsound. We similarly find the proposal to undertake the Green Belt review following the completion of the current Local Plan to be unsound. Notwithstanding this, should the Inspector conclude that the approach is acceptable, we then find Policy BDP4.2 to be sound.

The Council is correct to recognise that the Green Belt review will be needed not only to meet the housing needs of the Bromsgrove Area to 2030, but also to consider the longer term needs of the District and to meet the needs arising from the West Midlands conurbation (and particularly Birmingham City Council). Failure to do this would mean a second Green Belt review in the near future and would not provide the enduring boundaries expected by national Green Belt policy.

In addition we support Policy BDP4.3, that housing allocations will follow the approach taken in Policy BDP2. However in making this comment the Council must be aware that there may be a need for more major allocations to some of the smaller settlements in the north of the District to accommodate the overspill from the West Midlands conurbation, and more particularly the anticipated needs from Birmingham City Council. This may well be a more sustainable approach than to extend larger settlements, depending upon the level of need, and thus should not be discounted. We would also comment that the new boundaries for the Green Belt around the smaller settlements should not be unduly restricted. They should be drawn to allow the expansion of those settlements to meet existing and future needs of the settlement, for both market and affordable housing, and thus to provide ongoing support for the existing services and facilities.

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 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 checked="" type="checkbox"/>
--	-------------------------------------

Yes, I wish to participate at the oral examination

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)

Signature:



Date: 11/11/13

Part B (see Note 1 and Note 8 para 4.2)

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

Name or Organisation (see Note 8 para 4.1)

Brierley Properties Ltd

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

Page: 56	Paragraph: 8.127	Policy: BDP10
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)

[Empty box for details of non-compliance]

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)

[Empty box for suggested changes]

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

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Paragraph 8.127 states that consideration has been given to allowing the development of facilities for the elderly in the Green Belt but that this has been discounted because it would be contrary to Green Belt policy. We have made representations in respect of Policy BDP4 Green Belt that this is not justified because it will not allow an appropriate amount of housing to be provided to meet the specific needs of the elderly. In particular it will not allow for the development sites outside the defined settlements, the 'care villages', which are now popular and a very good way of meeting the identified needs, as there is no land available outside the defined settlements which is not designated as Green Belt and which is large enough to accommodate such a development. As such the policy to prevent such developments in the Green Belt is not justified.

The most appropriate way to overcome this problem is for Policy BDP4 to be amended to allow development in the Green Belt, as our separate representations explain. Policy BDP10 should be amended to provide support to such development in the Green Belt where it is necessary.

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)

Policy BDP.10 should be amended to recognise that housing to meet the needs of the elderly will have to be provided in the Green Belt.

The last line of paragraph 8.127 should be deleted.

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	X
Yes, I wish to participate at the oral examination	<input 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)

[Empty rectangular box]

Signature:



Date: 11/11/13