B019

Our Ref: IMG/csw
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11 November 2013

Dear Sirs

**Bromsgrove District Local Plan**
**Consultation on Proposed Submission – November 2013**

Carter Jonas LLP acts on behalf of Bovis Homes who are promoting for development two parcels of land located on the western and northern edge of Catshill. These sites will be referred to as:

- Land at Stourbridge Road; and
- Land at Woodrow Lane.

Bovis Homes are one of the UK's leading house builders with company offices in Warwickshire. They are committed to contributing towards sustainable communities - blending tradition with innovation.

Accompanying this representation is a promotion document for the two sites, which outlines the need for new housing in Bromsgrove District, and in particular at Catshill, with specific reference to the availability and deliverability of land west of Stourbridge Road and east of Woodrow Lane.

***Land at Stourbridge Road***

The site is 8 hectares in size, located to the west of Catshill, bounded on its western elevation by the M5. It is currently in agricultural use and comprises several fields. Existing residential development (Westfields) adjoins the eastern boundary in addition to Christ Church Cemetery. Access to the site can be provided off Stourbridge Road.

***Land at Woodrow Lane***

Located to the north of Catshill, the site extends to approximately 5 hectares in size, comprising agricultural grazing and arable land. Woodrow Lane adjoins the western boundary with existing

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access points. The southern and eastern boundaries are backed on to by residential development, with the Hilton Hotel to the south east.

Our representations to the Proposed Submission District Plan are set out below. To assist the Council, we have transposed these representations onto the Council's standard response form.

**Proposed Settlement Hierarchy**

Draft Policy BDP2 sets out the proposed Settlement Hierarchy for the delivery of housing in Bromsgrove District. This identifies three categories of settlement. The 'Main Town' which is Bromsgrove; 'Larger Settlements, which includes Catshill (one of six settlements); and 'Small Settlements', a total of fifteen.

BDP2.3 confirms that the Council will partly meet their housing requirement by identifying sites in or adjacent to the large settlements, including Catshill. We are in general support of this approach as it correctly recognises the strengths of Catshill as a sustainable location for accommodating future development needs.

The Settlement Hierarchy Topic Paper identifies that Catshill has one of the largest populations of the 'Larger Settlements'. It also recognises that the physical proximity of Catshill to Bromsgrove is a significant benefit, with regular transport links providing excellent access to the higher order services and employment opportunities available in Bromsgrove.

Within the Larger Settlements tier of the Settlement Hierarchy, Catshill should be a main focus for accommodating future development needs.

**Housing Need**

Draft Policy BDP3 sets out the level of housing provision to be delivered in Bromsgrove District Council in the period 2011 - 2030. The supporting text explains that the requirement has been based on the findings of the Worcestershire Strategic Housing Market Assessment 2012 (SHMA). The Proposed Submission District Plan reports that the SHMA identifies a net dwelling requirement of between 6,780 and 6,980, based on employment constrained and migration-led scenarios respectively.

As is always the case with SHMA documents, there will be significant debate at the District Plan Examination over the assumptions used in the SHMA, and whether the outputs are robust.

The Council states that it is committed to significantly increasing the supply of housing to meet need and demand. On this basis a housing target of 7,000 (368 dwellings per annum) is proposed. This is only 20 dwellings higher than the top end of the 'requirement' reported in the District Plan (migration led-scenario). We would query whether this represents a '*commitment to significantly increase the supply of housing*'. A higher target would demonstrate a greater commitment.

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The current position is considered to be too cautious and contrary to the requirements of the NPPF (paragraph 27), which states that:

"Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances".

**Housing Supply**

Since the start of the Plan period (2011-2013) the Council's Housing Land Availability Assessment (April 2013) has so far delivered an annual housing rate of 193 dwellings per annum. This leaves a residual housing requirement over the remaining Plan period (2014-2030) of 6,614 dwellings. With the inclusion of a 5% buffer, this equates to a 5-year requirement of 2,043 dwellings or 409 dwellings per annum. This is more than double the current rate of delivery.

Using this rate, the Council has identified a 5.83 years supply of deliverable housing from 2013-2018. This is a total of 2,394 dwellings based on several sources of supply, including commitments, identified SHLAA capacity and a windfall allowance.

- *Commitments*

These total 1,052 dwellings, 99 of which are under construction. The most recent SHLAA (July 2013) assumes that every site with planning permission will be delivered within the next 5 years, with no discounts applied. The SHLAA includes 5 sites with a capacity of in excess of 80 dwellings (this includes sites of 80, 88, 175, 178 and 181 dwellings).

We have significant concerns whether this high delivery rate will be achieved. We also note that the 178 dwelling site (Council ref: 12/0912) at Bleak House Farm, Wythall has not actually been granted planning permission according to the Council's website. Therefore this should not be included as a commitment.

- *SHLAA Capacity*

The Council has identified a supply of 1,212 dwellings from SHLAA sites. This includes a large proportion of sites where planning permission has yet to be granted. It also anticipates a high delivery rate, with several sites expected to deliver 200+ dwellings over the next 5 year period.

This figure is overly optimistic and relies on a delivery rate significantly greater than that evidenced in recent years. Indeed, it is noted that the Council does not expect any delivery from these sites in the next two years – requiring all 1,212 dwellings to be delivered over a 3-year period.

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- *Windfall Allowance*

  An allowance of 30 dwellings per annum has been used in calculating the windfall supply. This figures has been justified on past windfall rates as set out in the Council's '5-year housing land supply' (April 2013). These sites have come forward during a period of time when land available for housing (e.g. greenfield allocations) has been restricted. Considering that the Council has identified a much increased supply of available sites (SHLAA, commitments, etc) there can be no certainty that the contribution from windfall sites will remain as high. The allowance for windfalls should therefore be reduced.

In combination with the concerns over whether the housing requirement for Bromsgrove District should be increased, we are concerned that there will be a disparity between housing need and housing delivery.

**Review of Green Belt Boundary**

Adding further weight to the above concerns is the approach of draft Policy BDP4 in dealing with the essential need to undertake a Green Belt boundary review. Draft Policy BDP3.1 states that this review will take place prior to 2023, which is well over halfway through the Plan period. As sites in the Green Belt will play a fundamental role in achieving the District's housing requirement, it is essential to positively plan for this. Paragraph 47 of the NPPF requires local planning authorities to:

"use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this (NPPF) framework, including identifying key site which are critical to the delivery of the housing strategy over the Plan period".

The failure to assess and identify sites in the Green Belt is in clear conflict with this fundamental requirement. As a minimum, the Green Belt review should be brought forward to the early stages of the Plan period, with work commencing immediately after adoption of the District Plan.

BDP4.2 b) refers to the requirement to safeguard land to meet the development needs of 'Bromsgrove and adjacent authorities'. It is not clear whether this should actually refer to Bromsgrove District (and not just Bromsgrove itself).

**Existing Allocation to the North of Catshill**

Development is currently underway on land north of Church Road, Catshill. This follows the granting of detailed planning permission for residential development of up to 80 dwellings in 2012. The site is identified in the current Local Plan as an 'Area of Development Restraint'. These are sites located in the Green Belt that were identified to provide the necessary flexibility and certainty required to meet the longer-term development needs in the District.

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In recommending that the site should be included in the Local Plan, the Inspector recognised that the M5 motorway was a 'defensible boundary' and 'effectively severed the objection site from the wider Green Belt beyond, causing it to form nothing more than a wedge of open space dominated by urban influences on all side and suffering from urban fringe problems such as trespass and fly tipping'.

There are clear similarities between the Inspector's comments and the land west of Stourbridge Road.

**Affordable Housing**

Draft policy BDP8 sets an affordable housing threshold of 10 or more dwellings or sites equal or greater than 0.4 hectares. Where this threshold is exceeded there is a requirement for 40% affordable housing on greenfield sites. This is a blanket requirement throughout the District.

The concern is that the combination of a high affordable housing requirement and lack of allocated housing sites will significantly impact on the delivery of affordable housing in the Larger Settlements such as Catshill. This issue is further exacerbated by draft Policy BDB9, which does not allow rural exception sites on the edge of Larger Settlements. The reason given for this approach is that sufficient affordable housing will be delivered through the proposed site allocations. For Catshill, planning permission has already been granted on the allocated site at Church Road, which will deliver 32 affordable dwellings.

Having reviewed the most recent SHLAA (July 2013) there are no other sites that would accord with planning policy (both existing and as proposed in the draft Plan) that have the capacity to deliver 10+ dwellings. This could potentially result in no further affordable housing being delivered until the Green Belt boundary review, which may not take place until as late as 2023. This is an additional reason to undertake the Green Belt review now.

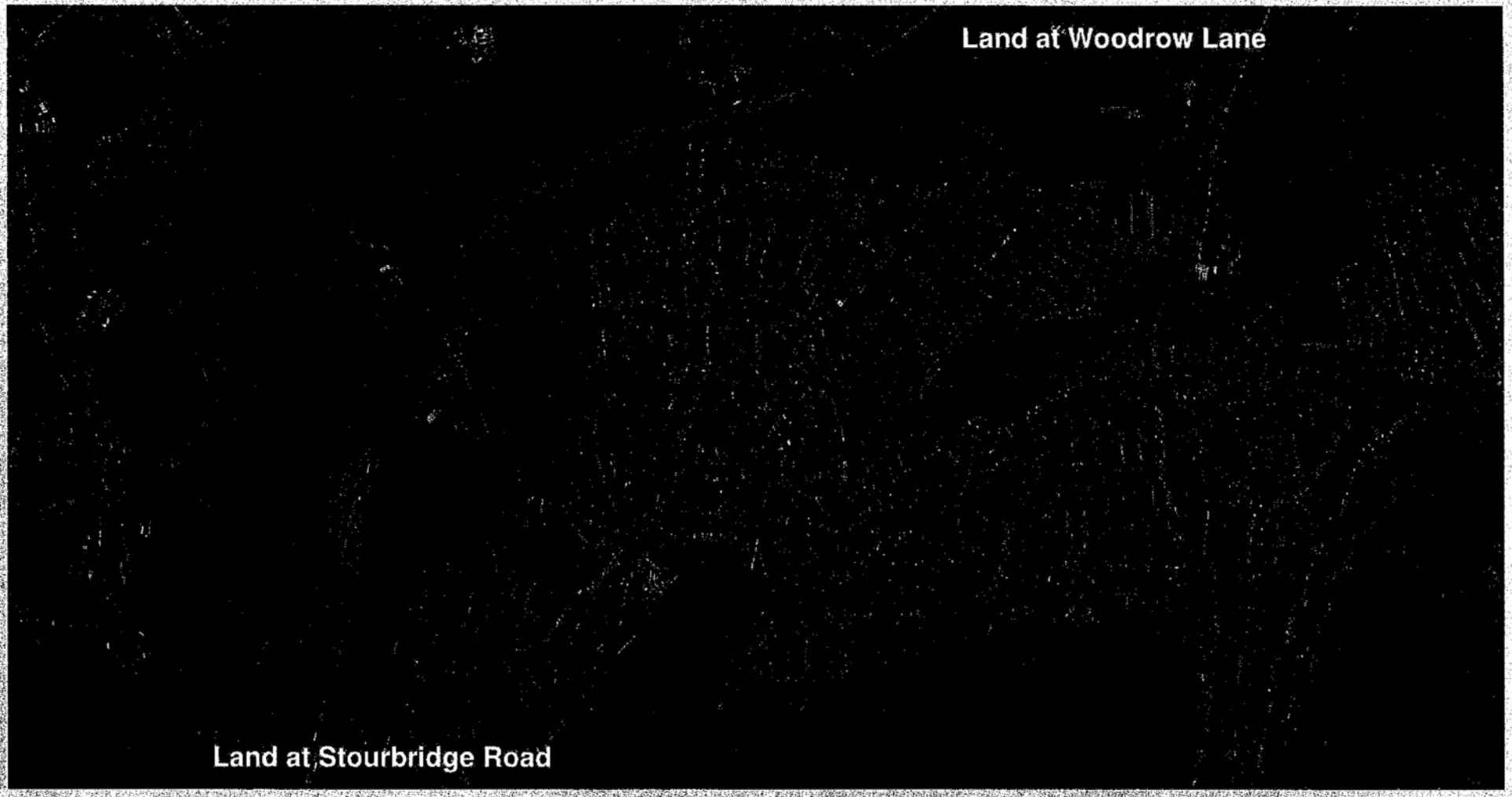
We trust the above comments on the Proposed Submission District Plan are clear. Please do let us know if you have any queries.

Kind regards

Yours faithfully

[redacted]

Encs.




# Delivering New Housing in Catshill

On behalf of
Bovis Homes
November 2013

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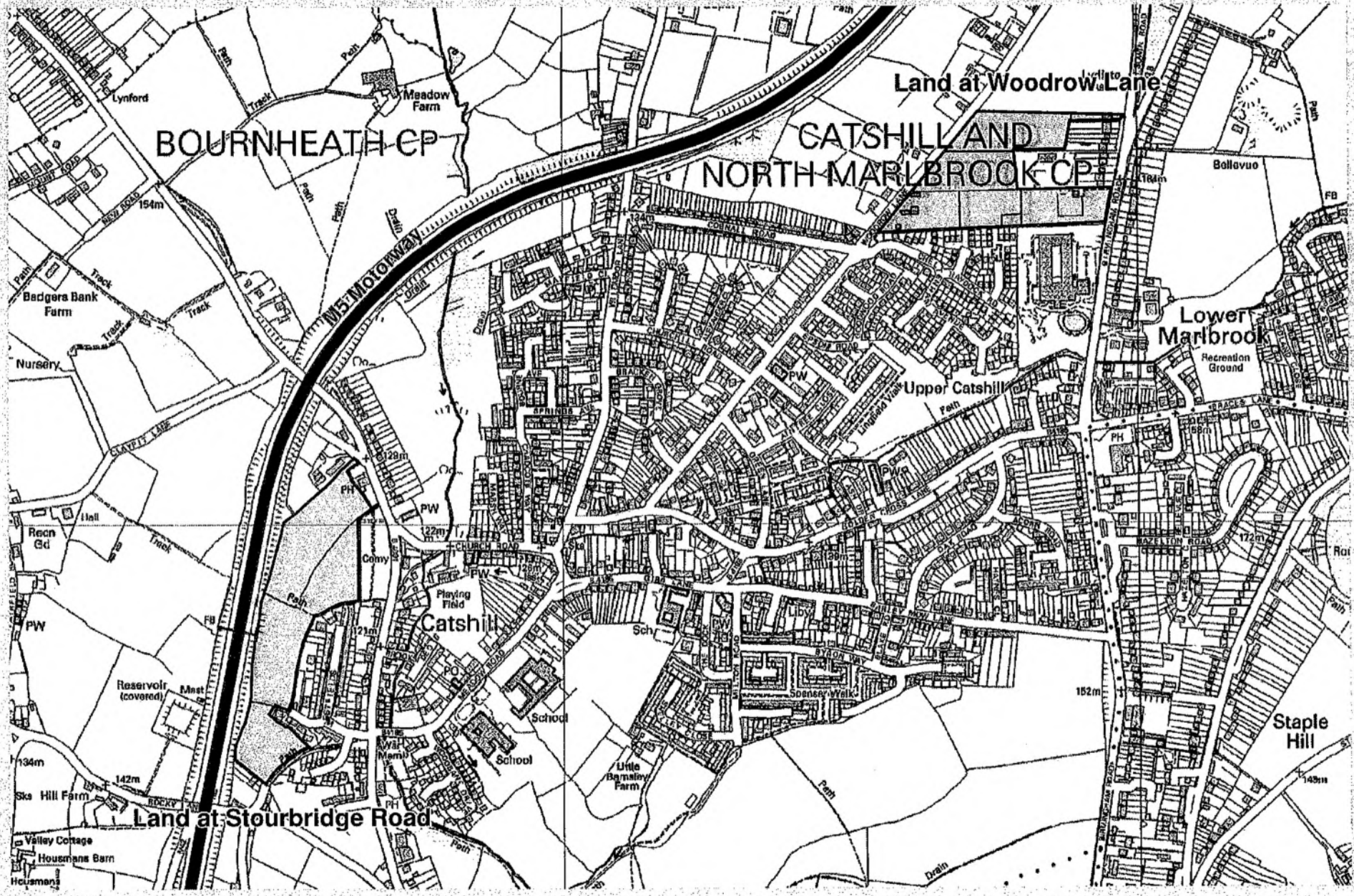
Land at Woodrow Lane
BOURNHEATH CP
CATSHILL AND
NORTH MARLBROOK CP
M5 Motorway
Lynford
Meadow Farm
Badgers Bank Farm
Nursery
Bellevue
Lower Marlbrook
Recreation Ground
Upper Catshill
Catshill
Playing Field
School
Reservoir (covered)
Hill Farm
Land at Stourbridge Road
Valley Cottage
Housmans Barn
Little Bamsley Farm
Staple Hill

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- Constraints
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# 1. INTRODUCTION

## Purpose and Scope

1.1 This document has been prepared on behalf of our client, Bovis Homes. The purpose of the document is to outline the need for new housing in Bromsgrove District, and in particular at Catshill, with specific reference to the development potential of land west of Stourbridge Road and land east of Woodrow Lane.

1.2 The first section of this document sets out the planning policy context. It addresses the need for a review of the Green Belt boundary around Catshill, to ensure that the town has the capacity to accommodate future development needs. Section 2 outlines the range of services and facilities available to the residents of Catshill, and the excellent local and regional transport links - demonstrating that Catshill is a sustainable development location.

1.3 Section 3 provides an analysis of both sites and the surrounding area, with a particular focus on the opportunities and constraints associated with the sites. Section 4 provides a short summary and conclusions.

1.4 It is proposed to set in motion a process whereby we engage with the Local Planning Authority, the Parish Council and local community to deliver development that meets the aspirations of the local community and provides much needed new housing.

## The Need for More Homes

1.5 For many years there have been insufficient new homes built to meet the country's needs. The recent recession and delays in the plan making process have resulted in a decline in the number of new homes being built.

1.6 Local planning authorities are now required to objectively assess the level of housing need in their area, and look to Plan to meet this need through the preparation of Local Plans.

1.7 Bromsgrove District Council is currently producing its District Plan, which will set out how the development needs of the Borough will be met in the period up to 2030. The Proposed Submission Plan proposes a housing target of 7,000 dwellings to be delivered between 2011- 2030 (368 dwellings per annum).

1.8 Bromsgrove District Council must also work with Birmingham and Redditch Councils, to assess whether some of the housing needs of these adjoining authorities has to be accommodated in Bromsgrove District.

1.9 The Proposed Submission Plan currently suggests that about 4,600 new homes can be delivered without the need to release land from the Green Belt. These 4,600 new homes will be accommodated on sites within the existing urban areas and on a few identified 'expansion sites'. However, to deliver the proposed 7,000 new dwellings in the period to 2013, the Council accepts that land will need to be released from the Green Belt.

1.10 The District Council have committed to undertake a full review of the Green Belt boundary following adoption of the District Plan. Whilst this commitment is to be welcomed, we strongly believe that the Council should be reviewing the Green Belt boundary as part of the current District Plan process.

1.11 At whatever stage the Council reviews the Green Belt boundary - full consideration should be given to the potential for Green Belt land releases at Catshill, in light of the services and facilities available, excellent transport links and availability and deliverability of land west of Stourbridge Road and east of Woodrow Lane.

# National Planning Policy

1.12 In March 2012, the Government published the National Planning Policy Framework (NPPF). At the heart of the NPPF is a presumption in favour of sustainable development. The Framework states that local planning authorities should positively seek opportunities to meet the development needs of their area and significantly boost the supply of new homes.

1.13 Local planning authorities need to prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities to identify how these housing needs will be met.

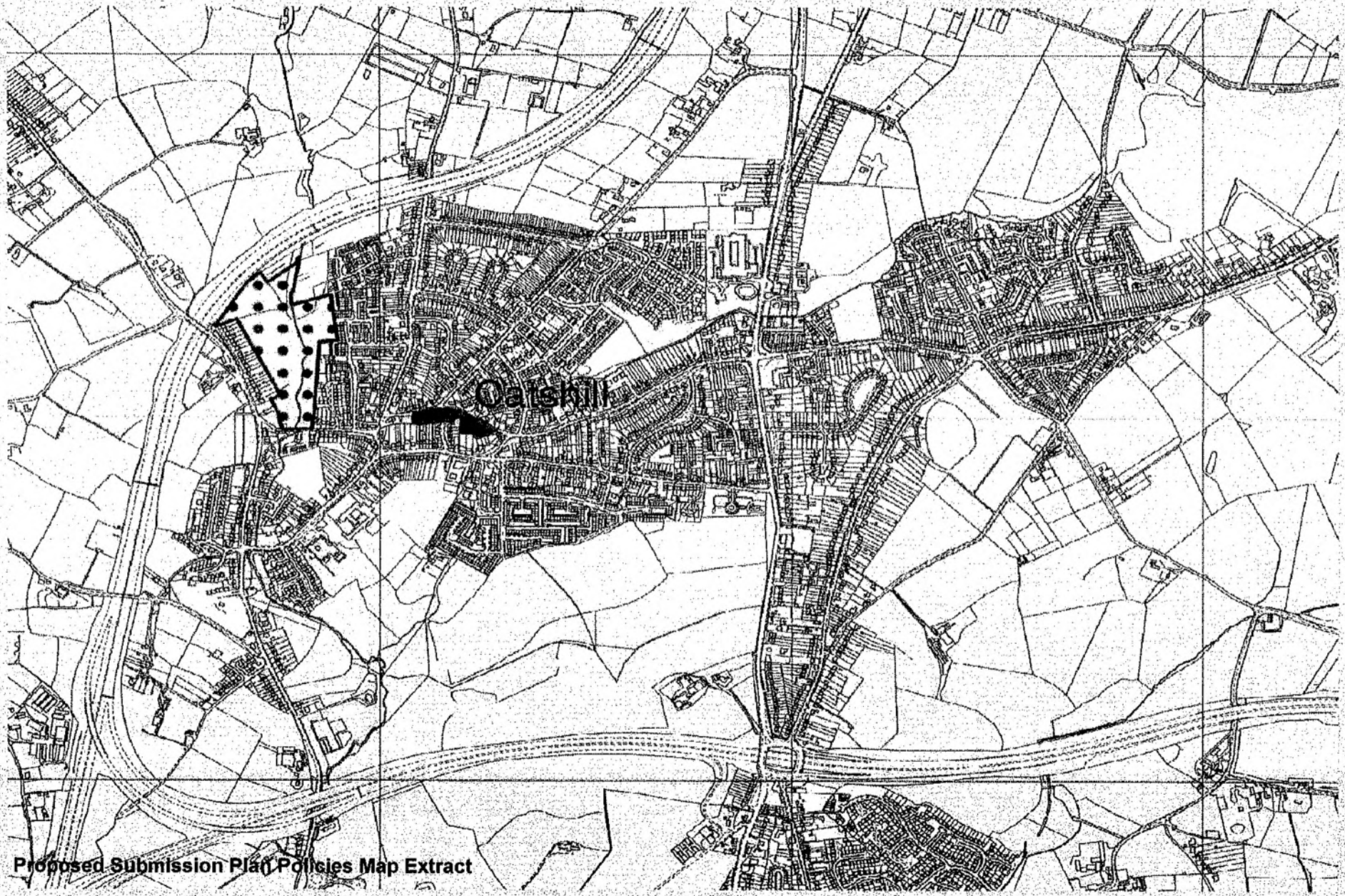
1.14 The NPPF identifies the five key purposes of the Green Belt:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

1.15 Although the NPPF attaches great importance to protecting the Green Belt, this protection needs to be balanced against the need for new homes and other forms of development. The NPPF is clear that when reviewing Green Belt boundaries, local authorities should take account of the need to promote sustainable patterns of development. Importantly, when defining Green Belt boundaries, the NPPF advises that Local Planning Authorities should satisfy themselves that the boundary will not need to be altered at the end of the District Plan period.

1.16 Green Belt boundaries should be clearly defined using physical features that are readily recognisable and likely to be permanent.

1.17 We agree with the Council that land needs to be released from the Green Belt, but in light of national policy, urge that the Green Belt boundary review is not deferred. The District Plan should be progressed with a defined Green Belt boundary that is capable of enduring beyond the Plan period (i.e. beyond 2030).



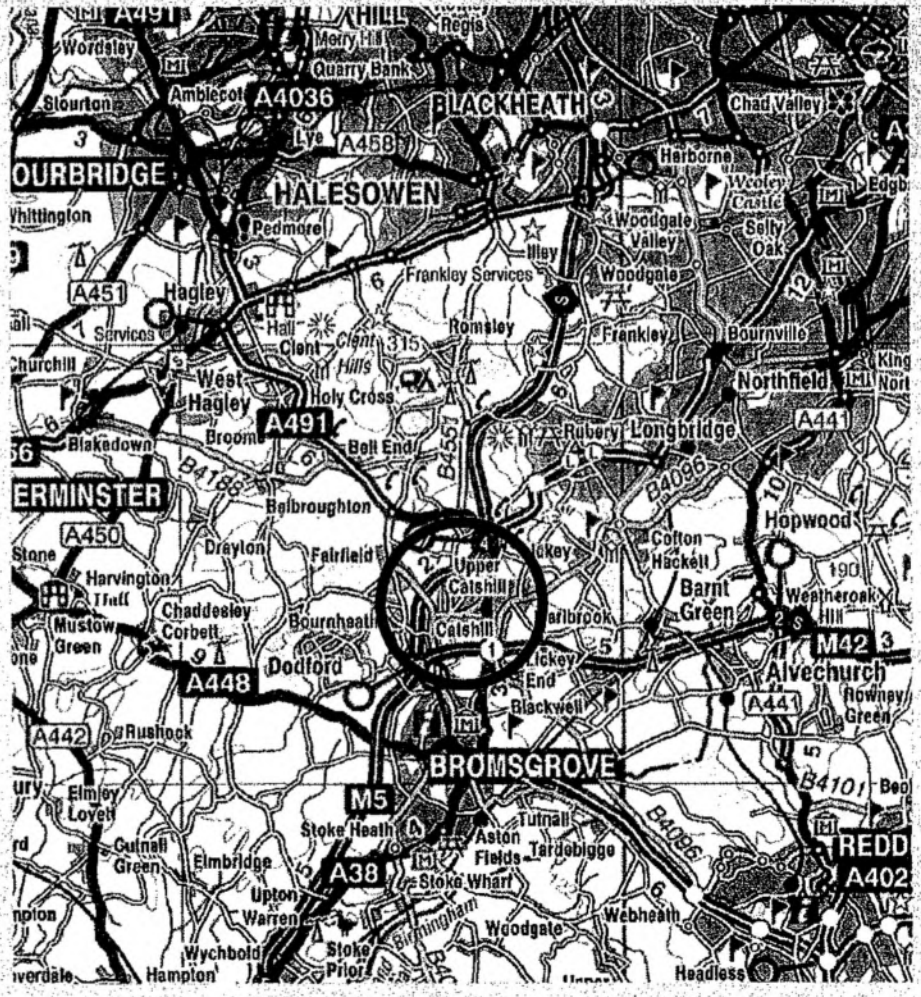

Proposed Submission Plan Policies Map Extract

# 2. CATSHILL

## Catshill - A Sustainable Development Location

2.1 Catshill is one of the largest settlements in the District, with a population of over 8,500 (including Marlbrook). Catshill is located approximately 2.5 miles to the north of Bromsgrove and 10 miles south west of Birmingham. It forms part of greater Bromsgrove town, accessed from both Stourbridge Road and the A38/ Birmingham Road.

2.2 Catshill is recognised by the Council as a sustainable location for accommodating future development. Whilst there are some opportunities for accommodating new housing development within the built-up area of Catshill, the Council will need to consider the role that greenfield sites, adjacent to the settlement, can play in meeting future development needs.

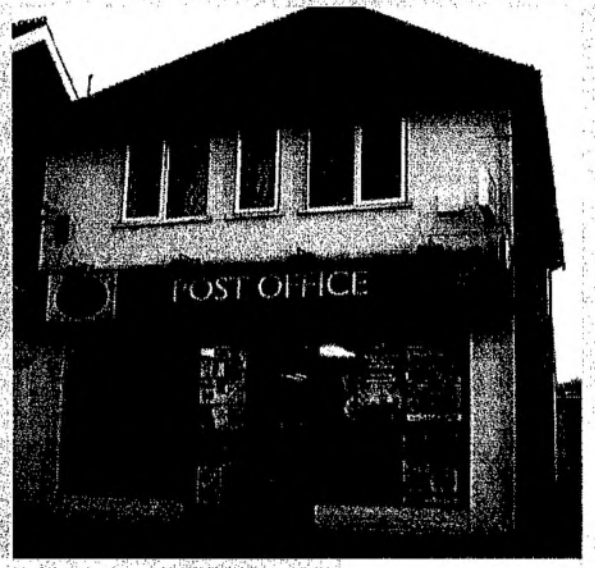


## Services and Facilities

2.3 Catshill has a wide range of services and facilities including a village hall, post office, public houses, library, dentist, doctor's surgery as well as a first and middle school. The majority of facilities are situated on Meadow Road and Woodrow Lane. There is a shopping area along Golden Cross Lane with a range of convenience stores, café, takeaways and pharmacy. There are various places of worship, recreational and play areas.

2.4 Additional development at Catshill will help to deliver new facilities and services, whilst helping to support existing community infrastructure.

2.5 As outlined below, the residents of Catshill also have good access to the higher order services available in Bromsgrove.




## Access and Connections

2.6 Catshill is situated in close proximity to both the M5 motorway, which runs to the west and north of Catshill, and the M42 motorway to the south. Junctions to the north and south of Catshill provide strong connections to Worcester and Birmingham and further south-west, south-east and north.

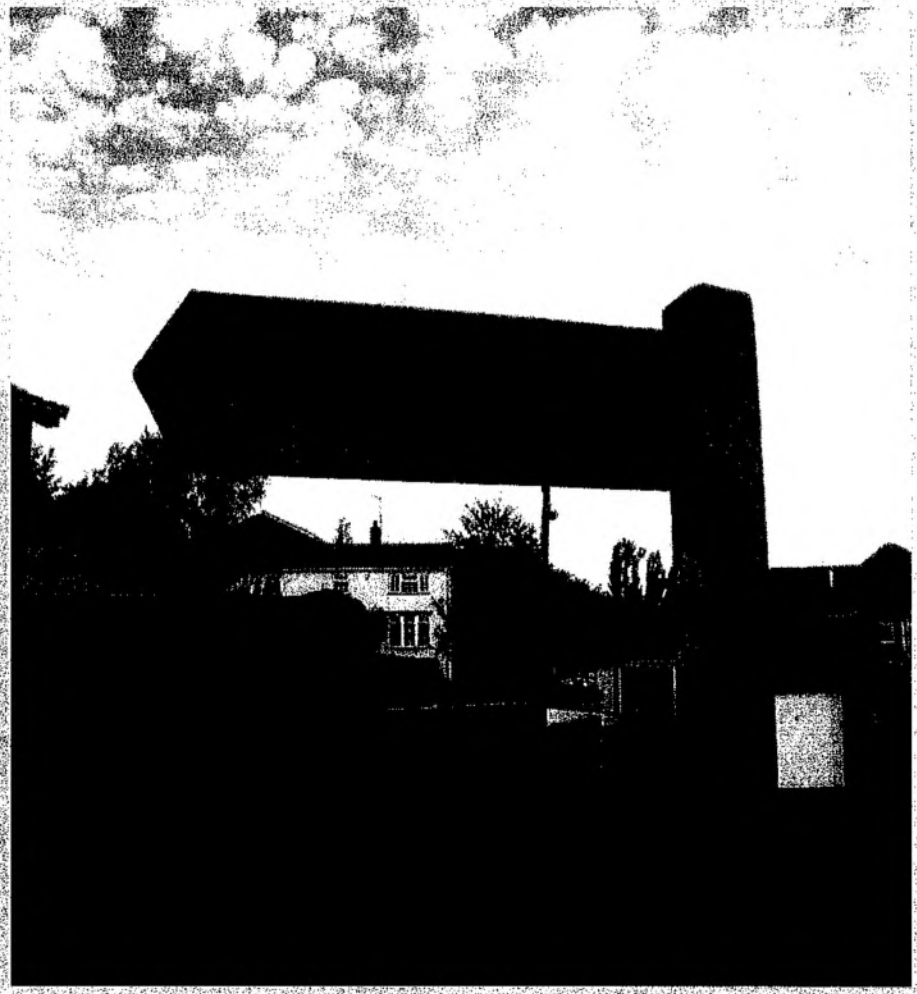
2.7 Bus: Catshill is served by a number of bus services, with regular connections to Bromsgrove and the Birmingham conurbation, Worcester and Droitwich. These connections are far more frequent than the rail connections between Bromsgrove and Birmingham.

2.8 Train: The nearest railway stations are at Bromsgrove and Barnt Green approximately 2.5 miles from Catshill, with connections to Birmingham, Hereford and Redditch.

2.9 Cycle: National Cycle Route No. 5 (West Midlands Cycle Route) runs through Catshill, along Woodrow Lane and connects to the B4091 Stourbridge Road by Milton Road. This route provides connections to Bromsgrove, Redditch and Birmingham. Bromsgrove town centre and station are less than a 15 minute cycle ride from both sites.

2.10 Walking: The services and facilities of Catshill are within an acceptable walking distance from both sites. There are a number of public rights of way, including links to surrounding areas such as Bournheath and Fairfield to the west.


First



# 3. SITE ASSESSMENTS

## Land West of Stourbridge Road

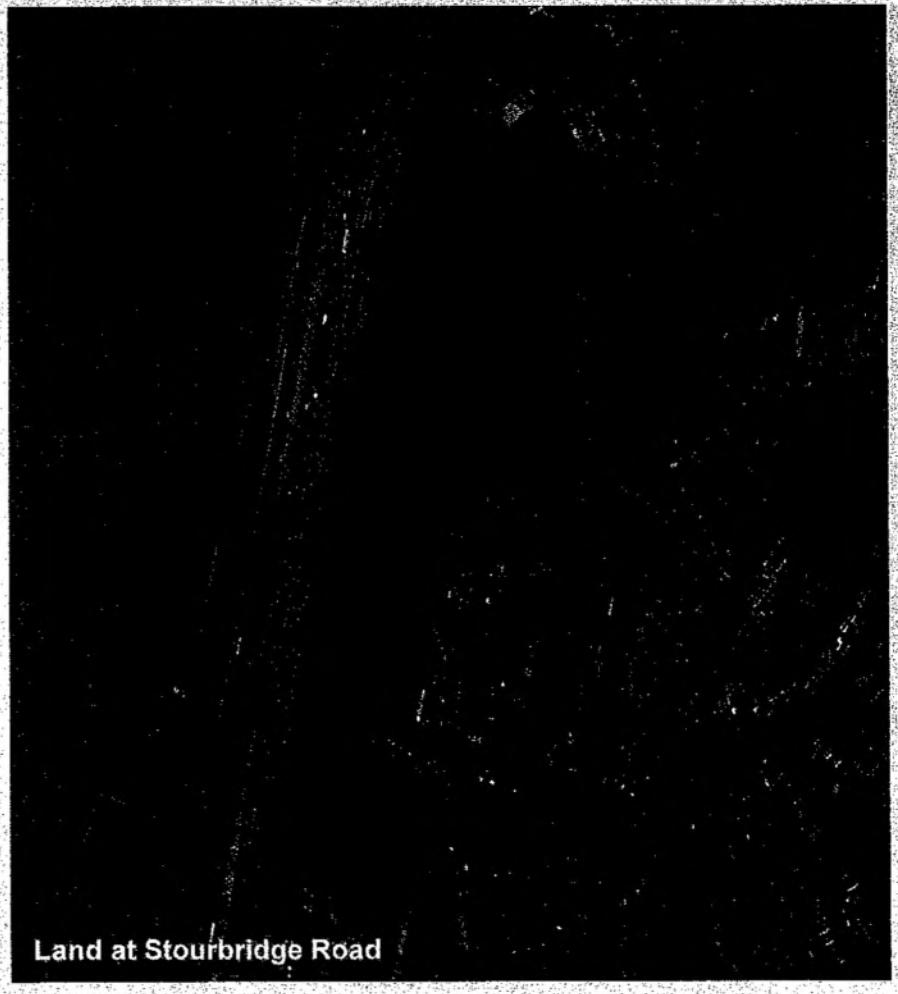
3.1 The site is situated to the west of Catshill and comprises several fields extending to approximately 8 hectares. The site is bound by the M5 motorway to the west, existing residential development (known as Westfields) and Christ Church Cemetery, to the east.

3.2 The land slopes from the south to its highest point towards the middle of the site, before sloping down again to the north. The southern-most field joins with the boundary of the M5, whilst the northern part of the site is separated from it by a further agricultural field. The land is not currently accessible to the public, and there are limited views into much of the site.

3.3 A public footpath runs through the middle of the site which connects to the village of Bourneheath, via a footbridge across the M5 motorway.

3.4 Access into the site will be taken off Stourbridge Road.

3.5 Bovis Homes are committed to working with the District Council, Parish Council and local community to deliver a sustainable urban extension on land off Stourbridge Road.



Land at Stourbridge Road

# Constraints

3.6 There are several constraints that will influence the form and location of development on land off Stourbridge Road:

- The impact upon the character of the countryside and setting of the town needs to be taken into account, including views from certain vantage points and public footpaths.
- The existing trees and mature hedgerows should be protected and retained where possible.
- Traffic noise associated with the M5 motorway to the west of the site is likely to require mitigation through attenuation measures.
- The setting of the Grade II listed Christ Church on the opposite side of Stourbridge Road should be protected.

# Opportunities

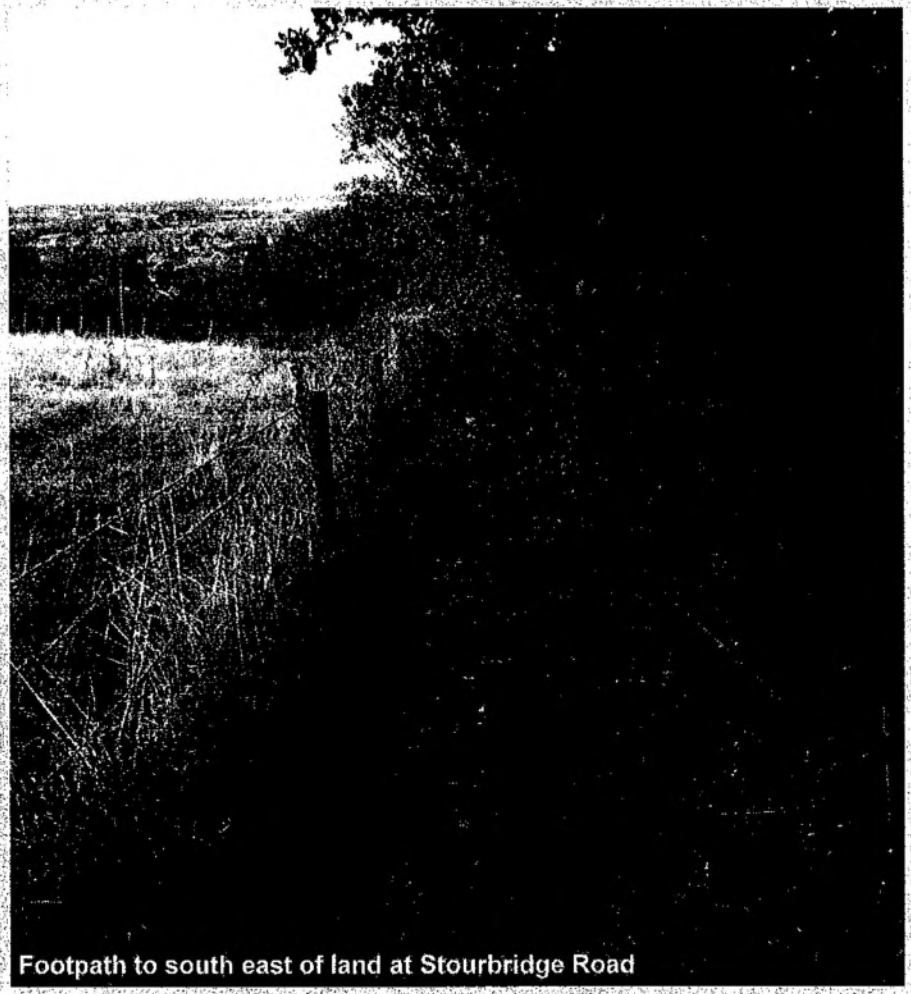
3.7 There are also a number of opportunities associated with the Stourbridge Road land:

- Scope to significantly boost the supply of new homes, including affordable housing, in a sustainable location without harming the wider countryside.
- Opportunity to introduce a defensible Green Belt boundary.
- Maximise opportunities for walking and cycling, by linking the development into existing networks, provide new/ improved links.
- Provide funding towards local community infrastructure, including education, health and transport provision.
- Maximise the environmental sustainability of the site through on-site renewables.
- Delivery of new areas of publically accessible open space.

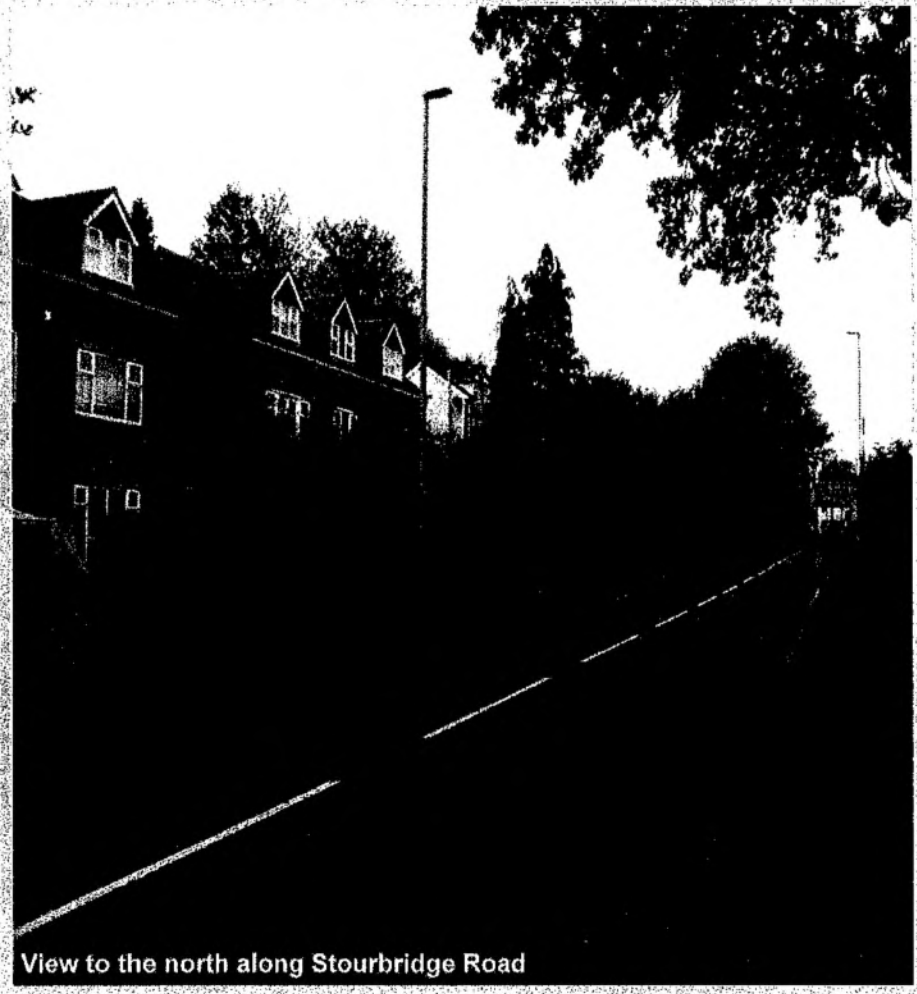
# Green Belt Assessment

3.8 The land off Stourbridge Road does not fulfil a strong Green Belt function:

- **To check the unrestricted sprawl of large built-up areas** - the M5 motorway provides a firm and defensible Green Belt boundary to the west of Catshill.
- **To prevent neighbouring towns merging into one another** - development of the land off Stourbridge Road would not result in towns merging with one another.
- **To assist in safeguarding the countryside from encroachment** – whilst much of the land is not currently visible or accessible, the nearby housing and M5 motorway having a strong urbanising influence.
- **To preserve the setting and special character of historic towns** - development of the land off Stourbridge Road would not affect the setting or special character of any nearby historic towns.
- **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land** – the Council's Monitoring Report demonstrates that urban sites have been coming forward, but the Strategic Housing Land Availability Assessment indicates insufficient urban housing sites are available to meet future development needs.



Footpath to south east of land at Stourbridge Road



View to the north along Stourbridge Road

# Land East of Woodrow Lane

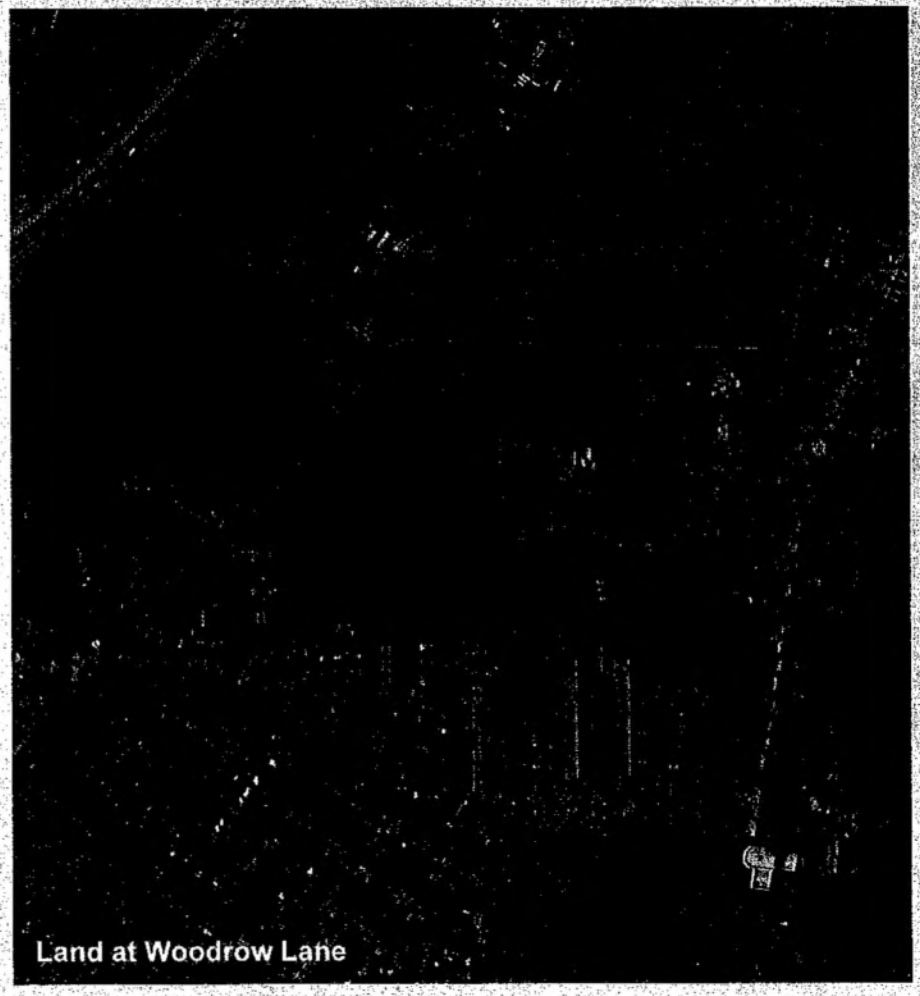
3.9 The site is situated to the north of Catshill and is approximately 5 hectares in size. It comprises land used for grazing and arable farming. The site is bound by a large field to the north, Woodrow Lane to the west, the rear boundaries of houses fronting Birmingham Road / the Hilton Hotel to the south-east, and by residential development to the south.

3.10 The topography of the land slopes to the south-west, from a gentle ridge. The site is divided into three sections, defined by hedgerow boundaries.

3.11 The land is not currently accessible to the public, and views into the site are restricted from the east, south and west.

3.12 There are two existing access points to the site from Woodrow Lane to the west.

3.13 Bovis Homes are committed to working with the District Council, Parish Council and local community to deliver a sustainable urban extension on land off Woodrow Lane.



Land at Woodrow Lane

# Constraints

3.14 There are a number of constraints that will influence the form and location of development on land at Woodrow Lane:

- The impact upon the character of the setting of the town needs to be taken into account, particularly in terms of views from the north.
- Need to protect the amenity of adjoining residential properties to the east and south.
- Need to protect and retain existing trees and mature hedgerows where possible (and include additional planting).

# Opportunities

3.15 There are also a number of opportunities associated with the Woodrow Lane site:

- Scope to significantly boost the supply of new homes, including affordable housing, in a sustainable location.
- Opportunity to introduce a defensible Green Belt boundary to the north and respond positively to the adjoining countryside, and to create an attractive frontage with Woodrow Lane.
- Maximise opportunities for walking and cycling, by linking the development into existing networks, provide new / improved links.
- Provide funding towards local community infrastructure, including education, health and transport provision.
- Maximise the environmental sustainability of the site through on-site renewables.
- Delivery of new areas of publically accessible open space.

# Green Belt Assessment

3.16 The land off Woodrow Lane does not fulfil a strong Green Belt function:

- **To check the unrestricted sprawl of large built-up areas** – Woodrow Lane to the west and Birmingham Road to the east would provide a firmer and more defensible Green Belt boundary to the north of Catshill.
- **To prevent neighbouring towns merging into one another** - development of the land off Woodrow Lane would not result in towns merging with one another.
- **To assist in safeguarding the countryside from encroachment** – the nearby housing, hotel and roads having a strong urbanising influence on the land.
- **To preserve the setting and special character of historic towns** - development of the land off Woodrow Lane would not affect the setting or special character of any nearby historic towns.
- **To assist in urban regeneration, by encouraging the recycling of derelict and other urban land** – the Council's Monitoring Report demonstrates that urban sites have been coming forward, but the Strategic Housing Land Availability Assessment indicates insufficient urban housing sites are available to meet future development needs.

View looking east across site from Woodrow Lane

# 4. SUMMARY AND CONCLUSIONS

4.1 Catshill is one of the largest settlements in Bromsgrove District, with a wide range of services and facilities and excellent transport links. It should therefore be a focus for new housing development over the Plan period.

4.2 With limited opportunities for further development within the built-up area, the District Council has committed to undertaking a review of the Green Belt boundary (following adoption of the District Plan). Whilst this commitment is to be welcomed, we strongly believe that the Council should be reviewing the Green Belt boundary as part of the current District Plan process. This review should give full consideration to the potential for Green Belt land releases at Catshill, on land west of Stourbridge Road and east of Woodrow Lane.

4.3 Both sites are available and deliverable. Furthermore, it is considered that neither the land west of Stourbridge Road or land east of Woodrow Lane fulfil a strong Green Belt function.

4.4 Both sites offer the opportunity to:

- Boost the supply of new homes in a sustainable location, with limited harm to the wider countryside;
- Deliver new facilities and services, whilst supporting existing community infrastructure;
- Improve pedestrian and cyclist facilities and public transport services;
- Incorporate high standards of sustainable building design and construction and promote energy and resource efficiency; and
- Define a strong and defensible Green Belt boundary.

4.5 Bovis Homes is committed to working with Bromsgrove District Council, the Parish Council and the local community to deliver sustainable urban extensions at Catshill with associated benefits.

## 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)**

| |
|---|
| Bovis Homes |

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

| | | |
|---|---|---|
| Page: | Paragraph: | Policy: **BDP2** |
| 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)

| |
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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)** | ☑ |
| (2) Effective **(see Note 5)** | ☐ |
| (3) Consistent with national policy **(see Note 6)** | ☐ |
| (4) Positively prepared **(see Note 7)** | ☐ |

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)

**Proposed Settlement Hierarchy**

Draft Policy BDP2 sets out the proposed Settlement Hierarchy for the delivery of housing in Bromsgrove District. This identifies three categories of settlement. The 'Main Town' which is Bromsgrove; 'Larger Settlements', which includes Catshill (one of six settlements); and 'Small Settlements', a total of fifteen.

BDP2.3 confirms that the Council will partly meet their housing requirement by identifying sites in or adjacent to the large settlements, including Catshill. We generally support this approach as it recognises the strengths of Catshill as a sustainable location for accommodating future development needs.

The Settlement Hierarchy Topic Paper identifies that Catshill has one of the largest populations of the 'Larger Settlements'. It also recognises that the physical proximity of Catshill to Bromsgrove is a significant benefit, with regular transport links providing excellent access to the higher order services and employment opportunities available in Bromsgrove.

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)**

Within the Larger Settlements tier of the Settlement Hierarchy, Catshill should be a main focus for accommodating future development needs.

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

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| **No,** I do not wish to participate at the oral examination | ☐ |
| **Yes,** I wish to participate at the oral examination | ☑ |

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Carter Jonas would like to participate in the Examination Hearing sessions relating to the Development Strategy / Settlement Hierarchy for Bromsgrove District (draft Policy BDP2) and the proposed housing land requirement for the area and the related approach to delivery (draft Policies BDP3 and BDP4). Our involvement will hopefully assist in ensuring the Bromsgrove District Plan is sound.

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| Signature: [redacted] | Date:11/11/2013 |

**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)**

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| Bovis Homes |

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

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|---|---|---|
| Page: | 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:☑ | 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)

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

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

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.
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**Housing Supply**

Draft Policy BDP3 sets out the level of housing provision to be delivered in Bromsgrove District in the period 2011 - 2030. The supporting text explains that the requirement has been based on the findings of the Worcestershire Strategic Housing Market Assessment 2012 (SHMA). The Proposed Submission District Plan reports that the SHMA identifies a net dwelling requirement of between 6,780 and 6,980, based on employment constrained and migration-led scenarios respectively.

As is always the case with SHMA documents, there will be significant debate at the District Plan Examination over the assumptions used in the SHMA, and whether the outputs are robust.

The Council states that it is committed to significantly increasing the supply of housing to meet need and demand. On this basis a housing target of 7,000 (368 dwellings per annum) is proposed. This is only 20 dwellings higher than the top end of the 'requirement' reported in the District Plan (migration led-scenario). We would query whether this represents a '*commitment to significantly increase the supply of housing*'. A higher target would demonstrate a greater commitment.

The current position is considered to be too cautious and contrary to the requirements of the NPPF (paragraph 27), which states that:

"Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances".

**Housing Need**

Since the start of the Plan period (2011-2013) the Council's Housing Land Availability Assessment (April 2013) has so far delivered an annual housing rate of 193 dwellings per annum. This leaves a residual housing requirement over the remaining Plan period (2014-2030) of 6,614 dwellings. With the inclusion of a 5% buffer, this equates to a 5-year requirement of 2,043 dwellings or 409 dwellings per annum. This is more than double the current rate of delivery.

Using this rate, the Council has identified a 5.83 years supply of deliverable housing from 2013-2018. This is a total of 2,394 dwellings based on several sources of supply, including commitments, identified SHLAA capacity and a windfall allowance.

- *Commitments*

These total 1,052 dwellings, 99 of which are under construction. The most recent SHLAA (July 2013) assumes that every site with planning permission will be delivered within the next 5 years, with no discount applied. The SHLAA includes 5 sites with a capacity of in excess of 80 dwellings (this includes sites of 80, 88, 175, 178 and 181 dwellings).

We have significant concerns whether this high delivery rate will be achieved.
We also note that the 178 dwelling site (Council ref: 12/0912) at Bleak House Farm, Wythall has not actually been granted planning permission according to the Council's website. Therefore this should not be included as a commitment.

- *SHLAA Capacity*

The Council has identified a supply of 1,212 dwellings from SHLAA sites. This includes a large proportion of sites where planning permission has yet to be granted. It also anticipates

a high delivery rate, with several sites expected to deliver 200+ dwellings over the next 5 year period.

This figure is overly optimistic and relies on a delivery rate significantly greater than that evidenced in recent years. Indeed, it is noted that the Council does not expect any delivery from these sites in the next two years – requiring all 1,212 dwellings to be delivered over a 3-year period.

- *Windfall Allowance*

An allowance of 30 dwellings per annum has been used in calculating the windfall supply. This figures has been justified on past windfall rates as set out in the Council's '5-year housing land supply' (April 2013). These sites have come forward during a period of time when land available for housing (e.g. greenfield allocations) has been restricted. Considering that the Council has identified a much increased supply of available sites (SHLAA, commitments, etc) there can be no certainty that the contribution from windfall sites will remain as high. The allowance for windfalls should therefore be reduced.

In combination with the concerns over whether the housing requirement for Bromsgrove District should be increased, we are concerned that there will be a disparity between housing need and housing delivery.

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

See above.

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| **No**, I do not wish to participate at the oral examination | ☐ |
| **Yes**, I wish to participate at the oral examination | ☑ |

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| Carter Jonas would like to participate in the Examination Hearing sessions relating to the Development Strategy / Settlement Hierarchy for Bromsgrove District (draft Policy BDP2) and the proposed housing land requirement for the area and the related approach to delivery (draft Policies BDP3 and BDP4). Our involvement will hopefully assist in ensuring the Bromsgrove District Plan is sound. |

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|---|---|
| Signature [redacted] | Date: 11/11/2013 |

**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)**

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|---|
| Bovis Homes |

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

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| Page: | 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)

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

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

| | |
|---|---|
| Yes:☐ | No:☑ |

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

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

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)

**Review of Green Belt Boundary**

We have concerns with the approach of draft Policy BDP4 in dealing with the essential need to undertake a Green Belt boundary review. Draft Policy BDP3.1 states that this review will take place prior to 2023, which is well over halfway through the Plan period. As sites in the Green Belt will play a fundamental role in achieving the District's housing requirement, it is essential to positively plan for this. Paragraph 47 of the NPPF requires local planning authorities to:

"use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this (NPPF) framework, including identifying key site which are critical to the delivery of the housing strategy over the Plan period".

The failure to assess and identify sites in the Green Belt is in clear conflict with this fundamental requirement. As a minimum, the Green Belt review should be brought forward to the early stages of the Plan period, with work commencing immediately after adoption of the District Plan.

BDP4.2 b) refers to the requirement to safeguard land to meet the development needs of 'Bromsgrove and adjacent authorities'. It is not clear whether this should actually refer to Bromsgrove District (and not just Bromsgrove itself).

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| Signature: [redacted] | Date:11/11/2013 |

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

Name or Organisation **(see Note 8 para 4.1)**

| |
|---|
| Bovis Homes |

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

| | | |
|---|---|---|
| Page: | Paragraph: | Policy: **BDP8** |
| 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.

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**Affordable Housing**

Draft policy BDP8 sets an affordable housing threshold of 10 or more dwellings or sites equal or greater than 0.4 hectares. Where this threshold is exceeded there is a requirement for 40% affordable housing on greenfield sites. This is a blanket requirement throughout the District.

The concern is that the combination of a high affordable housing requirement and lack of allocated housing sites will significantly impact on the delivery of affordable housing in the Larger Settlements such as Catshill. This issue is further exacerbated by draft Policy BDB9, which does not allow rural exception sites on the edge of Larger Settlements. The reason given for this approach is that sufficient affordable housing will be delivered through the proposed site allocations. For Catshill, planning permission has already been granted on the allocated site at Church Road, which will deliver 32 affordable dwellings.

Having reviewed the most recent SHLAA (July 2013) there are no other sites that would accord with planning policy (both existing and as proposed in the draft Plan) that have the capacity to deliver 10+ dwellings. This could potentially result in no further affordable housing being delivered until the Green Belt boundary review, which may not take place until as late as 2023. This is an additional reason to undertake the Green Belt review now.

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)**

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| **No**, I do not wish to participate at the oral examination | ☑ |
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