

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

Page: 74 - 75	Paragraph: 8.202 – 8.206	Policy: BDP17 Town Centre Regeneration
Policies Map:	Other document:	

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

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

Yes: <input type="checkbox"/>	No: <input type="checkbox"/>
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3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

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

(1) Justified (see Note 4)	<input checked="" type="checkbox"/>
(2) Effective (see Note 5)	<input 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)

**Save the High Street** - the difficulties being experienced in the retail sector are well rehearsed and it is vital that Members of the Council understand the irreversible long term changes that are taking place. There is a high vacancy rate in Bromsgrove town centre and the reason is not the underlying level of rents which have already fallen by over 30%, it is about demand. Very simply, the demand is less than the supply.

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The draft Development Plan makes reference to "many national retailers who would like to locate to Bromsgrove" and the need to respond by providing larger premises. Professionally I have some experience in the retail market and this is illusory. Policy making must not interfere with common sense and the real world.

Many second tier towns are now supported by a growing catalogue of discount stores. Bromsgrove is no exception. The presence of these retailers creates a charmless down market shopping environment and drives away the more affluent shoppers who are the people that really are needed for a sustainable future. Furthermore providing larger premises on fringe sites will contribute absolutely nothing to the current retail core which is where the focus should be. I am genuinely concerned that bad policy making will destroy the High Street.

Bromsgrove can survive where others might not but some of the fundamental issues which must be addressed are as follows:-

1) The retail core has already contracted and it will continue to do so if new peripheral and edge of town developments are permitted. The consent given to Sainsbury's for a new supermarket so close to the High Street is a disaster and in particular it will damage the fortunes of smaller independent businesses which the Council say are so important to Bromsgrove. Its impact cannot be underestimated.

2) One of Bromsgrove's biggest assets is its relatively large middle class population and to ignore this would be tragic. These are the very people who must be attracted back into the centre, in turn encouraging the resurgence of high quality independent retailers. Bromsgrove should be capable of supporting a small number of decent national retailers but inflated ego's dreaming of something more significant is pure fantasy. A high street crammed full of discount stores, charities and coffee shops is not the answer.

3) Out of town and edge of town shopping is successful because it is accessible and parking is free. This is not rocket science and Bromsgrove and other similar towns must learn from this if they are to survive. The town centre undoubtedly requires improved security, lighting and street furniture but what will really bring people back is quick and easy access to the shops – perhaps some form of restricted traffic access.

4) On a national level rates are a real issue. These are too high and must reduce if a new generation of independent retailers is to flourish. Private landlords have already taken the pain by reducing rents dramatically and the government must do the same.

The current policies on retailing in the town centre are and out of date. "Regeneration" is a word that has been used in the draft Development Plan but unless the policies are reviewed to reflect current and future shopping habits we will all be sad witnesses to decline and degradation.

I urge you to open your eyes, walk down the High Street, and consider these comments before it is too late.

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

*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: 21/10/2013
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