

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)

Lickey and Blackwell Parish Council

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

Page: 23	Paragraph:	Policy:BDP 4 Green Belt
Policies Map:	Other document:	

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

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

Yes: <input checked="" 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)

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)

A full Green Belt Review needs to be undertaken if the Plan is to be agreed as it stands. An alternative way forward would be to publish the Plan up to 2023 only and to continue to work on it, to have a Green Belt Review and full consultation and to publish the second part of the Plan in approx 5 to 8 years time.

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

Whilst wishing to see a Plan finalised (it is already 2 years into its time span) it is unsound in that it is undeliverable as it stands because it does not offer sufficient development sites but merely suggest that these will be forthcoming as a result of a Green Belt review. This is a cart before the horse situation.

The District Plan commits Bromsgrove to housing and employment land policies without being able to offer a complete list of sites beyond 2023. It acknowledges that there are only sufficient sites to satisfy housing numbers until 2023 and that a Green Belt review will be needed in order to find sufficient safeguarded sites to meet its target to 2030. It is therefore an incomplete plan and would be more honest if it either ended at 2023 or were not published until a full Green Belt Review had been completed.

On the other hand, the advantage of not identifying all sites at the beginning of the Plan's period is that it avoids a repetition of the overbuild followed by moratorium, which created so many problems during the life of the previous District Plan.

One area where Green Belt has been identified as development land is the huge area (approx 2,700 dwellings) at Foxlydiate /Webheath/Bentley). It is inconsistent that this area, which has had no Green Belt Review, should be chosen for development whilst it is still in Green Belt. This site is particularly contentious because there will undoubtedly be an impact on visual amenity(BDP 1.4) This is not an objection at this stage to the choice of site (this has already been done) so much as a suggestion that the District Plan does not comply with one of its own policies and is therefore unsound.

It is further undeliverable because it cannot fulfil its aspirations for an adequate public transport service throughout the district. Worcestershire County Council is seeking to make a £3m reduction in bus subsidies, which would render the Bromsgrove bus service totally inadequate in many areas, leaving some villages with no public transport service at all. This tragedy came after the BDP was submitted for this final consultation but its ability to deliver on BDP 16 is now seriously in doubt.

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)

An immediate Green Belt review would find the missing sites and enable the Plan to be finalised as a complete Plan with sufficient land until 2030.

If this were done, it would be deliverable BUT care would need to be taken that too many of the proposed dwellings were not delivered in the first part of the Plan's time span.

Bromsgrove District Council needs to find an urgent solution to the probable loss of bus services in the area and, if possible, include it in the Plan before it is presented to the Secretary of State. If this cannot be done, an explanation of its bus policies must be included.

If the Plan is not delayed until a Green Belt Review has identified the sites required until 2030 it would be better to publish the Plan in two stages, the first expiring in 2023. Given that the Green Belt Review will have been completed by approx 2018/19 there will be time to then complete part 2 of the

Plan, which will propose the development required between 2023 and 2030 and beyond.

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

My position as secretary of CPRE Bromsgrove and Wyre Forest has allowed me to study closely the Plan and all the documents leading to its publication. I know the sites earmarked for development and the policies which led to their choice. I shall however be speaking as a local parish councillor who is secretary of a Neighbourhood Plan group. I want to show that, whilst the number of dwellings deemed necessary by the Plan can be delivered by 2030, it is not sound to produce a Plan, which cannot identify sufficient sites at the point of publication.

Signature



Date: 27 October 2013