



11th November 2013

The Strategic Planning Team,
Planning and Regeneration,
The Council House,
Burcot Lane,
Bromsgrove,
Worcestershire,
B60 1AA

Dear Sir/ Madam

BROMSGROVE DISTRICT PLAN - Proposed Submission Version 2011-2030

At the outset of this response the City Council wishes to place on record its view that collaboration between the respective Councils in recent years has been both intense and fruitful and there is every reason to believe this will continue to be the case.

This collaboration includes the adoption of a cross-boundary Area Action Plan for Longbridge prepared in the aftermath of the collapse of MG Rover.

Currently, both Councils are working jointly with the seven other local authorities in the GBSLEP in the preparation of an innovative strategic spatial plan for the GBSLEP area which will help inform the future scale and pattern of future growth, setting a context for the review of local plans where this is found to be necessary and

appropriate. As an integral part of the work on the spatial plan all nine local authorities within the GBSLEP have commissioned a Strategic Housing Needs Study which will look at growth over the next 20 years.

The City Council first notified adjoining authorities of an emerging housing shortfall in Birmingham in August 2012 and has been working hard to ensure this issue is shared with our neighbours and that a collaborative solution be sought. The joint working that is taking place is directed to achieving this outcome and until this is completed the City Council has not been able to determine the extent of any specific housing shortfall which it could request be taken forward by Bromsgrove (or for that matter any other local authority) in their Local Plan. The evidence base underpinning the emerging Birmingham Development Plan suggests, however, that the overall housing shortfall in Birmingham is likely to be around 30,000 dwellings in the period up to 2031. The City Council's reading of Government policy is that collaborative working is the way in which these matters should be addressed and the engagement should be continuous and on-going. This is the approach being taken within the GBSLEP but in a way which does not delay progress on taking forward emerging plans to adoption.

The City Council is also mindful of the progress being made between Bromsgrove and Redditch Councils to resolve the longstanding issue of housing growth to meet Redditch's needs that cannot be met within Redditch's administrative area.

Against this context the City Council would wish to express its support for the broad approach taken in relation to scale and pattern of growth included in the plan and more specifically has the following observations:

Duty to Cooperate

Paras 1.13 to 1.16

The City Councils supports the summary of extensive discussions held with Bromsgrove District Council under the Duty to Co-operate. The reference to, and Bromsgrove's full commitment to participation on the GBSLEP Housing Needs Study is especially welcome.

Local Enterprise Partnership

Paras 1.17 to 1.20



The City Council supports the reference to Bromsgrove's membership of the GBSLEP and the importance of the commitment to the visions, aims and objectives of the LEP.

Policy BDP3 Policy Future Housing and Employment Growth

The City Council supports the overall levels of growth for both housing and employment subject to its observations in relation to the Green Belt Review which are covered in substance under Policy BDP4. The level of housing proposed is broadly consistent with the 2008-based household projections and until such time as the GBSLEP Strategic Housing Study is completed there is no basis for an alternative figure. Given the scale of the emerging housing shortfall in Birmingham, however, there are likely to be pressures for further housing development within Bromsgrove during the plan period.

Policy BDP2 Policy Settlement Hierarchy Policy

The city council supports this policy subject to the suggested deletion of sub para BDP 2.6 since this unnecessarily constrains and pre-empts the Green Belt Review and would, for example, preclude the provision of a Sustainable Urban Extension of Birmingham as a means to address the emerging housing shortfall as currently drafted.

Policy BDP4 Policy Green Belt

The City Council supports the proposed Green Belt Review in respect of the potential housing shortfall emerging in Birmingham but wishes to propose two minor changes:

1. The first is to replace under BDP4.2 "advance of 2023" by "to reflect the outcome of the GBSLEP Strategic Housing Needs Study" This change is suggested since the GBSLEP Strategic Needs Study will establish the extent and timescales affecting future housing needs.

2. In relation to BDP4.2 the City Council suggests that the words "follow the approach in BDP2 Settlement Hierarchy and" should be deleted for consistency with the City Council's suggested amendment above to Policy BDP2.6.

Development Sites

The City Council is of the view that the definition of individual sites is a matter for the District Council to determine but welcomes the commitment to carry forward the proposals as set out in the Longbridge Area Action Plan which includes specific provision towards helping to meet Birmingham's housing needs.

Possible Future Direction of Growth

The City Council wishes to notify Bromsgrove District Council of land in its ownership within Bromsgrove's administrative area and to request that the proposed Green Belt Review should take full account of the potential of this land which is of a scale that could enable the provision of a Sustainable Urban Extension should the GBSLEP Strategic Housing Needs Study conclude that further land for housing to meet Birmingham's needs is required in Bromsgrove District.

Sustainable Travel

The City Councils supports the extensive references in the plan to improvement of sustainable travel and in particular upgraded rail connections with Birmingham.

Yours faithfully

