

**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)

Parkwood Consultancy Services Limited

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

Page:	Paragraph:	Policy:BDP1/3
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 checked="" 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)

The BDP fails woefully to meet the absolute requirements, set out in the NPPF, to assess housing needs based on up to date assessments of housing growth and needs. The total requirement is based upon historic data that was used for the RSS Review and as such is out of date. Recent case law has made it clear that LPAs are required to undertake and maintain up to date assessments of housing needs and not to rely upon historic data.

It is considered that Bromsgrove's simplistic reliance upon the assessment of housing needs that was used in support of the RSS is wholly wrong and fails to identify the true level of housing needs across the District – in addition to those of surrounding LPA areas.

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)

It is considered that the Development Target ought to be re-evaluated. It is considered that the requirement for Bromsgrove ought to be raised to 9,000 dwellings and to be set as a minimum. In addition it is considered that the suggestion that the Greenbelt will not be required until 2023 is both unrealistic and misleading. That assumes that all Greenfield sites are developed to their full extent and without any delay. This is unfeasible on both counts. Accordingly the Policy should confirm that there will be a maximum of 4,600 dwellings outside the Greenbelt and that a Greenbelt Review will be undertaken immediately and as a matter of urgency.

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

It fails to make adequate assessment of and provision for housing needs.
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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 3 and 4 above.
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*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.**

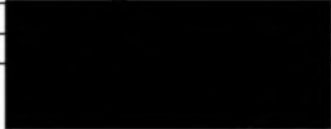
8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? *Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

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)

The issues are critical to the effectiveness of the Local Plan.

Signature:



Date:8/11/13

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

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Name or Organisation (see Note 8 para 4.1)

Parkwood Consultancy Services Limited

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

Page:	Paragraph:	Policy:BDP2/4
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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Yes:  No:

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The Plan, by being so locationally restrictive, will fail to both provide for the gross needs of the District and also the widespread needs of local communities. Furthermore this will result in new housing being forced to locations that are unsuitable and which are unsustainable in the truest sense (in terms of broader community needs).

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The opportunity for further development in rural areas should be acknowledged and set out in both policies. The NPPF requires LPAs to make provision for needs across all areas and sectors of the community – including rural areas. Policy BDP2 does not allow for such needs to be properly met and should not be restricted to Rural Exception sites on the periphery of existing settlements. Instead the policy should allow for suitable sites on the edge of existing settlements to be brought forward particularly where this would result in an attractive development capable of delivering clear gains and bringing forward suitable family housing to help sustain smaller communities.

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

Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
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It does not allow for the proper provision of housing to meet the needs of the whole District in a sustainable form.
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