

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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 9	Paragraph: 2.20	Policy:
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"/> NO
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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)

We do not accept that the Plan is legally compliant, but this objection is not challenging that.

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)

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

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

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)		<input type="checkbox"/>
(4) Positively prepared (see Note 7)	not	<input type="checkbox"/>

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This paragraph adopts the County Council's Landscape Character Assessment. This is a valuable piece of work, classifying differing historical rural settlement patterns. Unfortunately, it does not provide a very useful plan-making tool, as it makes no judgments as to what kinds of landscape are the most valuable and so should be the most protected. This is partly the result of a map by its nature being horizontal. The landscape impact of a given development depends also on the vertical aspects. "A city set on a hill cannot be hidden". It is in the nature of things that development high up a hillside is visible from a much greater distance than development on a plain.

The old Local Plan designates the Clent and Lickey Hills as a Landscape Protection Area. This designation serves to strengthen that as Green Belt. This is important in the context where the Plan provides for a Green Belt Review. The LPA designation serves to emphasise the importance of this area. The LPA designation may be an old one. But it was presumably drawn based on evidence. Whatever that evidence was, it is likely to continue to be valid, because there has been no change in the morphology of the district. The present designation providing some Landscape Protection for the Clent and Lickey Hills should be retained.

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)

Insert new paragraph:

2.20A: In the west of the district, the Clent and Lickey Hills form a landscape barrier between the conurbations of Birmingham and the Black Country to the north and the countryside of the district to the south. These hills are largely within the district, and like most of the rest of the District's countryside are designated as Green Belt.

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

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Date: 11 November 2013

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

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

Page: 9	Paragraph: 2.22	Policy:
Policies Map:	Other document:	

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- The two registered parks (those of Hagley Hall and Hewell Grange) should be named.
- The Chartist settlement is certainly important, but the last half of the last sentence seems an exaggerated claim. This may be someone's opinion; if so, an academic citation for this is needed. However, it would be better to omit it.

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See 6

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

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

Page: 10	Paragraph:	Policy: 2.24
Policies Map:	Other document:	

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

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

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This is inaccurate. The Landscape Character Assessment made no attempt to consider built-up areas, merely classifying them "urban areas", which is their landscape type. The second sentence of the paragraph is thus unsupported by evidence. Where development has been piecemeal, historic boundaries have frequently been preserved within the urban environment. This is likely to apply as much to Hagley as to Bromsgrove.

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Amend text to reflect these comments

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

Page: 10	Paragraph: 2.27	Policy:
Policies Map:	Other document:	

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

Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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The text needs to be expanded to provide more detail on car ownership.

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

Page: 10	Paragraph:	Policy:2.28
Policies Map:	Other document:	

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This paragraph is inaccurate. It refers to the whole district, not just Bromsgrove. Birmingham is not the only commuter destination. Bromsgrove, throughout the Plan should mean Bromsgrove Town, not Bromsgrove District.

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Amend the final sentence:

Due to the District's close proximity to the West Midlands conurbation, many inhabitants ~~in~~ Bromsgrove of the District commute to work in Birmingham, the Black Country and Solihull.

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

Page: 10	Paragraph:	Policy: 2.29
Policies Map:	Other document:	

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Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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We do not believe the accuracy (or perhaps relevance) of the final two sentences. No one in their right mind would prefer to drive through the town instead of using the motorways. They would not even use the Bromsgrove bypass, unless the motorway was closed and it was unavoidable. The comments are accurate on the rare occasions when the motorway is blocked or closed, but the congestion caused by diverting traffic off is not an issue that can readily be resolved by any policy that is reasonably capable of delivery.

Furthermore, this is not the only place where motorway closures cause severe congestion. Closure between M5 junctions 3 and 4 causes severe congestion in Hagley.

There are certainly congestion issues around Bromsgrove; A38 immediately south of M42 J1 is extremely congested. However that traffic is largely local traffic going to or from the motorways on inadequate roads. Furthermore, the only available route from the western parts of Bromsgrove to the motorways is through the town.

The problem of congestion within the town is partly due to the lack of a link between the Stourbridge and Birmingham Roads except close to the centre. The Plan should (somewhere) be proposing the completion of a link road from near the northern end of Perryfields Road to Lickey End. It is noticeable that the Perryfields ADR is the only one in respect of which there has been no planning application. The first section of a potential link road has been built, but the rest is needed to open up this ADR and make it attractive to developers. In accordance with Policy BDP4, a review of the Green Belt boundary has to be undertaken to meet the District's development needs for the 2020s. The area between Bromsgrove, Lickey End and M42 ought to be a prime candidate for release. This will also require the completion of such a link road. This should provide an opportunity for relieving congestion within the town.

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Delete penultimate sentence

Alternatively, amend to penultimate sentence:

Furthermore, if there is a problem with traffic flows on the motorways in the vicinity of Bromsgrove, traffic tends to divert through along the A38, causing localised congestion and air quality issues at certain times.

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Page: 10	Paragraph:	Policy: 2.30
Policies Map:	Other document:	

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This paragraph is not positively prepared. It should be saying that the district does not need an airport because it is well connected to Birmingham Airport.

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The paragraph should be saying that the district does not need an airport because it is well connected to Birmingham Airport. What conference and employment facilities exist there is irrelevant to the plan and does not need to be mentioned.

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

Page:	Paragraph:	Policy:3.5
Policies Map:	Other document:	

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We do not accept that the Plan is legally compliant, but this objection is not challenging that.

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)

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

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

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<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)

CPRE as a matter of principle supports the reduction in the need to commute as desirable. Nevertheless, "Stemming outward commuting" in the commuter belt is unachievable. It may be achievable in the immediate vicinity of Bromsgrove. The strategy of the Plan seems to be to convert Bromsgrove into a self-sufficient island. This is impracticable in an area heavily under the shadow of the conurbations. Indeed, the prosperity of most of the district (except perhaps in Bromsgrove and Catshill) suggests that the objective is actually counterproductive and will do harm to most of the district. Except in relation to the narrow Central Zone around Bromsgrove, the objective is unsound.

This could only be achieved if large amounts of employment development in the commuter belt, other half of the district, but these are areas of very low unemployment, where the ability to commute into the conurbations is their main *raison d'être*. Any such development would inevitably be in the Green Belt and incompatible with its purposes and contrary to the detailed policies in the Plan.

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)

The challenge should be limited to Bromsgrove town and areas immediately adjacent to it.

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.

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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.**

No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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)

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Signature

Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 12	Paragraph: 4.1	Policy:
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"/> NO
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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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5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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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 type="checkbox"/>
(3) Consistent with national policy (see Note 6)		<input type="checkbox"/>
(4) Positively prepared (see Note 7)	not	<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)

The purpose of this paragraph is unclear and waffles. If the Bromsgrove Partnership is correctly described in its own annual report, it is incorrectly described in the Plan. That report lists the partners as a series of governmental and quasi-governmental organisations, without any "private, voluntary or community organisations". Of the Board members, BDHT and North-east Worcestershire College may technically independent of government;

only the business representative possibly comes into the description “private” and there seems to be no voluntary-sector involvement at all, unless it is some charity that is largely dependent on being financed from public funds.

Since Bromsgrove is within both the Greater Birmingham and Solihull LEP and the Worcestershire LEP, a statement as to which LEP is meant.

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)**

The paragraph might be amended to read:

4.1 The vision for Bromsgrove expressed in the Bromsgrove District Plan needs to support the vision ~~that has been established by~~ of the Bromsgrove Partnership.

“We will make Bromsgrove District the place to live, do business and to visit.”

~~This~~ The Bromsgrove Partnership is a consortium of local authorities and other mainly public sector bodies covering the Bromsgrove Area. ~~brings together different organisations from the public, private, voluntary and community sectors. Instead of each organisation working separately in isolation, the Bromsgrove Partnership provides a forum for local organisations to come together and address issues that are important to those living, working and visiting Bromsgrove District in a more effective and cohesive way. Bromsgrove Partnership’s vision for the District is:~~

The vision also needs to be consistent with the vision of the relevant Local Enterprise Partnership (LEP). ~~Embracing the key messages of the LEP visions and incorporating the challenges previously identified, the following vision for the Bromsgrove District Plan has been derived:~~

Quote the LEP vision statement(s).

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.

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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.

No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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)

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Signature:



Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 12	Paragraph:	Policy: 4.6
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"/> NO
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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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5. Do you consider the BDP is sound? (see Note 3)

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

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<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)

This is a plan to try to convert Bromsgrove District into a self-sufficient island. Commuting into the conurbation is the principle economic basis of the rural part of the district; indeed all of it except Bromsgrove itself, Catshill, and perhaps Stoke Prior. Accordingly, balance is

unachievable for the district as a whole.

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)

The paragraph would probably become satisfactory if it referred in line 1 to "Bromsgrove" rather than to "the District".

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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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Signature:



Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 15	Paragraph:	Policy: 7
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"/> NO
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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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5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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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 type="checkbox"/>
(3) Consistent with national policy (see Note 6)		<input type="checkbox"/>
(4) Positively prepared (see Note 7)	not	<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)

This section should not merely be incorporating the key diagram, but also the Proposals Map. This is a matter of good drafting.

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)

Amend text to include a reference to the Proposals Map

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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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)

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Signature: 

Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 18	Paragraph: 8.9	Policy:
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"/> NO
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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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5. Do you consider the BDP is sound? (see Note 3)

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

(1) Justified (see Note 4)	not	<input 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)	not	<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)

Paragraph 8.9 is correct as far as it goes, but it is factually inaccurate in so far as it implies that the town is the main local shopping centre for the whole district. The relative remoteness of Bromsgrove from parts of the district means that residents of those areas are at least as likely to do their main shopping in towns beyond the district boundary.

The former WMRSS classified the main retail centres in four tiers, but Bromsgrove was not in any of these tiers; thus being a tier 5 non-strategic retail centre. The Plan appears to be attempting to elevate Bromsgrove Town to a status that is unachievable. So far as it is unachievable a policy is inevitably unsound.

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)**

Insert after first sentence:

However those parts of the district that are remote from Bromsgrove Town tend to look to towns beyond the district boundary for services not available locally.

Amend four lines from the end to:

... Bromsgrove Town ~~providing~~ able to provide most of the services. ...

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.

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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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Signature

Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 21-22	Paragraph: 8.20 AND	Policy: 3.3
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 type="checkbox"/> NO
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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)

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

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

(1) Justified (see Note 4)	not	<input 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)	not	<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)

Paragraph 8.20 (page 21) and Policy BDP3.3 (page 22)

This is not positively prepared. It should not be necessary to repeat NPPF's requirements. The paper on Delivery Performance makes clear that over the long term the District has a good record of delivery, apart from the recent period when the housing market closed down following the Credit Crunch and during the latter part of the Housing Moratorium. That Moratorium was the consequence of a period of gross over-delivery. Accordingly there should be no need to refer to the possibility of a 20% buffer.

If the Inspector at the Examination disagrees, he can require the reverse change to be made.

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)

Remove all reference to a 20% buffer

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.

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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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Signature

Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 43-46	Paragraph:	Policy: RCBD1
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"/>	NO
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Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	NO
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Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	not	<input type="checkbox"/>
(4) Positively prepared (see Note 7)		<input type="checkbox"/>

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Principles

CPRE deplors any need to roll back the boundaries of the Green Belt, but accepts that in the long term, this is probably unavoidable. Nevertheless, as a matter of principle, land that is currently designated as Green Belt should still be the last choice for where intensive development should take place. Accordingly, the Plan should be structured, so that all sequentially preferable sites, even difficult ones, should be used up before development of current Green Belt is allowed.

SHLAA Failure

We consider that Redditch has not been inventive enough in identifying sites in its SHLAA. Urban green spaces ought to be sequentially preferable to any use of the Green Belt whatsoever. There are considerable areas designated as Private Open Space, which could have and should have been considered for use before encroaching on the Bromsgrove Green Belt. The SHLAA should not only be considering sites offered to the Council by developers, but be looking for potential sites itself. The current attitude of their owners may make them less deliverable than those offered by developers, but such attitudes are not necessarily permanent ones. Even if not suitable for inclusion in a 5-year supply, they may be suitable for the 15-year supply.

The Director of Planning for both Bromsgrove and Redditch Councils has stated that Bromsgrove had employed a senior planner to examine the Redditch SHLAA before accepting Redditch's request. As she has a conflict of interest (being Director for both councils), that planner reported to the Bromsgrove Strategic Planning Manager, as was wholly appropriate in the circumstances. Dr King, as the local CPRE group chairman asked to be pointed to a web-link to the report by the senior planner, which ought anyway to be part of the Evidence Base of both Councils, but what he was provided with related to the search as to what land outside Redditch.

Because Bromsgrove and Redditch have been conducting consultations at the same time, we do not have the time and resources to provide detailed criticism as to what sites in Redditch ought to have been included in its SHLAA, but will seek to do so in time for the Examination, or rather when evidence needed for it is required to be filed.

Comparison with Bromsgrove

The Bromsgrove SHLAA has identified capacity from urban sites and what was Safeguarded Land (then called Areas of Development Restraint – ADR) to provide approximately 4600 of its 7000 house target to 2030. This is estimated to be enough to last until 2023. Accordingly, a Green Belt Review is proposed to be undertaken in time to provide capacity for the period 2023-30 and probably beyond. Bromsgrove thus has a 10-year supply. It is accordingly inappropriate for Bromsgrove to anticipate the result of its review, or at least to do so more than absolutely necessary, by caving in completely to Redditch's demands.

NPPF provides a duty to cooperate; it does not require Bromsgrove to roll over, belly up, to any request made of it. A suggestion that large scale development is required in the Green Belt is a very serious matter indeed. We see no reason why the Bromsgrove Plan should place Redditch in any better position than Bromsgrove. There is also a cooperation request (though less formal) from Birmingham, which is also liable to require land to be released from the Green Belt. We of course deplore that possibility, but accept that it may be necessary, unless housing targets are reduced. Accordingly, the appropriate strategy is for (at most) a limited release of land now, perhaps to make up Redditch's land supply to 6-8 years (at worst 10 years). This will mean that all options can be considered in the course of the full Green Belt Review on Bromsgrove, which regrettably appears to be a longer term necessity.

Bromsgrove should set its policy so as to encourage Redditch to use up urban capacity

before developing what is currently Green Belt. Accordingly, the excess over (perhaps) a 6-8 year land supply should not be fully released immediately. If released at all, it should become Safeguarded Land; at worst, a substantial part of it should be Safeguarded Land, rather than immediately a potential development site. This is necessary to protect the rest of the Green Belt. It will be recalled that the former WMRSS was restrictive of development beyond conurbations (called by it Major Urban Areas – MUA).

We appreciate that NPPF advises against frequent revisions of Green Belt boundaries. However, the short-term needs of Redditch can properly be regarded as an exceptional circumstance allowing a modest revision, in advance of the full review. It may be that the full review will reach the same conclusions, but equally, it might not.

Site selection priority

If land has to be released from the Green Belt at this stage, we would prefer it to be Site 2 (as shown on Map 10). Whether fortuitously or by design, the north-western boundary of this appears once to have been the county boundary between Worcestershire and Warwickshire, until the Warwickshire part of the ancient parish of Tardebigge (now the civil parish of Tutnall and Cobley) was restored to Worcestershire in the 19th century. The physical geography of the area is such that development in that area will have limited impact on the Green Belt elsewhere.

If that is insufficient, the rectangle of land (the Foxlydiate Rectangle) immediately west of Foxlydiate should be the next to be selected. This has robust boundaries, with Cur Lane on the south or southwest and a bridleway on the northwest. The corner of this Foxlydiate Rectangle is at SP008673. The Worcestershire Landscape Character Assessment classifies the whole of Site 1 as Principle Timbered Farmlands, but we would question that because the land to the northwest consists of a few large fields, and has a high classification as agricultural land, whereas the rectangle consists of smaller closes.

If the remainder of Site 1 cannot remain part of the Green Belt, it should initially become Safeguarded Land, so that it will be impossible for an isolated suburb to be developed on the part of Site 1 to the northwest of the Foxlydiate Rectangle, due to the Foxlydiate Rectangle not being developed first.

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)**

Ideally, this policy should be deleted.

Assuming that is not possible, RCBD1 should identify only a portion of the land subject to it in the draft, applying the site selection priority set out above. The rest of the land should preferably remain as Green Belt, though liable to be considered as part of the general Green Belt Review, or at worst become Safeguarded Land.

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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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Signature 	Date: 11 November 2013
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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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page:	Paragraph:	Policy:
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"/> NO
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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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5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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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)	not	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)		<input type="checkbox"/>
(4) Positively prepared (see Note 7)	not	<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)

The refusal in paragraph 8.30 to provide any targets for individual settlements is likely to mean that there is no incentive for villages to identify land to become safeguarded. This is likely to mean that the NIMBY tendency will result in little (or at least not enough) being identified.

If a settlement is given a target of 150 houses, there can be a local consultation as to which SHLAA or other sites might be released for 150. If there is no such target, local NIMBY opinion might decide on a target of 50 or even nil, so that a top-down target of another 100 might have to be imposed, contrary to the principle of Neighbourhood Planning. Conversely, if the settlement was given a target of 150, it would be highly inappropriate for the District subsequently to decide the target should be 350: that would also be an unprincipled deviation from the principle of Localism.

It is appreciated that this is to anticipate the outcome of the Green Belt Review, but we do not see how robust Neighbourhood Plans can be prepared, with the objective of meeting the long term development needs of the District unless there are some targets at a neighbourhood level. These might perhaps be provisional ones, explicitly subject to amendment by SPD, following consultation on how the 2400 house sites should be distributed. Alternatively, the distribution needs to be the subject of an early Issues and Options consultation. The place to provide for that will be in a new LDS, but an amended 8.30 probably needs to anticipate this. Without this the Plan is unsound.

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)**

- Provide an interim split of the target between settlements, if only in general terms, but explicitly subject to amendment as soon as a consultation has been held on this.
- Provide for an early consultation on how the 2400 deficit should be split.

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Signature



Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 25	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: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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(1) Justified (see Note 4)	<input type="checkbox"/>
(2) Effective (see Note 5)	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input type="checkbox"/>
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CPRE deplores any loss of land currently designated as Green Belt to intensive development, but recognises that the development land supply situation in the District renders a review of the Green Belt unavoidable.

Strategy

Policy BDP 4.1 should not end "as per BDP4.2", but "except so far as land may be released from the Green Belt, in accordance with BDP 4.2-4.3, either by making it Safeguarded Land or land immediately available for development.

Some of the land, both for the 2020s and the 2030s needs initially to become Safeguarded Land. The Plan accordingly needs to lay down a requirement for a review of Safeguarded Land, so that there is a formal planned release, perhaps every three years, so that there is always a 5-8 year supply of available land. This is in the spirit of the NPPF requirement that each council should have a five-year supply, with a buffer.

The past procedure on Safeguarded Land (hitherto known as Areas of Development Restraint) has not been operated as intended when the 2004 Local Plan was being formulated. What should have happened is that when the Council lost an appeal in 2009, overturning the housing moratorium, it should immediately have conducted a Review, as laid down in the Local Plan and decided what parts of the ADRs should then be released to provide the required land supply. The failure to do that meant that the development process has been developer-led, rather than plan-led, with the Council only able to react. It was advised that it had to grant planning consent for ADRs, when it ought to have been beyond the powers of the Planning Committee to grant planning permission for unreleased ADRs, without a Review being undertaken.

To be sound, the Plan needs to contain provisions as to the status of future Safeguarded Land and a mechanism for its release. This is particularly necessary in the case of the Redditch Expansion Areas (Policy RCBD1) to ensure that Redditch makes good use of its urban capacity.

Green Belt development

The list of types of development that may not be inappropriate in the Green Belt is unsatisfactory thus unsound.

- BDP4.4b: Sporting facilities ought to be required not to affect the openness of the Green Belt. The present policy would allow the provision of a large sports stadium, because it would be for outdoor sport and recreation, despite adversely affecting the openness. This is intended to clarify the policy, not change it. Without a change, there is a risk that the policy will be unclear and provide a pretext for applications for inappropriate development. By doing so, the Policy is unsound. Because substantially all the rural parts of the district are Green Belt, there is no need to have separate policies for "rural areas" and "Green Belt".

Example: The Rugby Stadium near M5 J6 shows what should not happen in the Green Belt. This is of course not in the District, but it is in the Green Belt and has adversely affected its openness. Some slight rephrasing is needed to make clear that the requirement for preserving openness applies generally, not merely to 'other purposes'.

- BDP4.4c relates to existing buildings. A policy on this is certainly necessary, but the proper place for this is in BDP15.

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)

Amend BDP4.4 as follows:

Appropriate facilities for outdoor sport and outdoor recreation, for cemeteries, and for other uses of land ~~which~~ where those facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land in it.

Delete BDP4.4c AND add this text (or something to the same effect) to BDP15.

Add (new)

BDP4.5 The policies on alterations to existing buildings are set out in Policy BDP15.

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Date: 11 November 2013

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

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Name or Organisation (see Note 8 para 4.1)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 26-42	Paragraph:	Policy: BDP5 - introductory
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:

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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Yes:

No: NO

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

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<input type="checkbox"/>
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We wish to see the principle of Safeguarded Land brought into the Plan. We are not suggesting that this should apply to the Perryfields site or the Whitford site (the latter subject of a current planning application). We consider that the way in which planning consent has been granted in respect of what were ADRs has not have happened (see Dr King's Housing Policy History paper). This was despite some 2000 objections to particular sites in response to DCS2, and objections to individual planning applications on an equally unusually high scale, often several hundred per application. Nevertheless, this is history and what has been done cannot readily be undone. On the other hand, we are concerned to see that the past is not repeated in the future. With hindsight the procedure for releasing ADR land was probably too longwinded. However, we consider that the Plan will be unsound unless the principle of Safeguarded Land is established in the Plan. This can then be adopted by a Supplementary Plan giving effect to the results of the Green Belt Review without it being necessary to define what Safeguarded Land is and how it should be released.

Apart from the Perryfields and Whitford ADRs, the following ADR land still has no planning consent:

- Frankley ADR. We understand there is a question about whether this is in fact deliverable, due to restrictive covenants.
- Hagley ADR (part), with a capacity for perhaps 18 houses.
- Ravensbank employment ADR.

BDC is required to have a five-year land supply. The recent planning consents mean that it has that. By making all the former ADRs immediately available to get planning consent and be developed, BDP gives the district something like a 10-year supply, including the Perryfields and Whitford sites. This is considerably in excess of what is required for a 5-year supply. The 15-year supply requirement can properly be dealt with by having Safeguarded Land. It is suggested that the remaining ADR sites (listed in the preceding paragraph) should be (re)designated as Safeguarded Land, with the Plan laying down a clear and uncomplicated mechanism for their release.

BDC produces an Annual Monitoring Report. At the time when that is laid before the full Council, the Council should each year consider its land supply situation and whether (and if so what) land should be released. This would then be followed by one public consultation and an Examination, enabling the Release Plan to be adopted within 6 months to a year. This will mean that there will be a steady managed release of land for development. We are now at the end of the second period in the last two decades, when the process has become developer-led: the period 1998-2003, after the first Local Plan Inquiry rejected the Plan until the Council had to adopt a housing moratorium; and the second in the aftermath of the abandonment of the moratorium. That must not be allowed to happen again.

We are not suggesting that the Perryfields and Whitford ADR sites should become Safeguarded Land, because we believe that they are suitable for development and fail to understand why Perryfields has not hitherto come forward for development. We support the policy of the former WMRSS that development should mainly be in market and larger towns (and above in the settlement hierarchy) and the Council's view that Bromsgrove is the only town in the district.

In the past Council policy was that when it had reached a 5-year housing land supply, it would consider what should happen subsequently. We cannot locate our source on that, but it ought to be a matter of principle anyway. The papers cited in paragraphs 8.20 and 8.21 indicate that Bromsgrove has over the longer term a good record of housing land delivery, compared to targets and that it has now approximately reached a 5-year supply. This is

accordingly an appropriate time to consider re-designating the remaining ADR sites as Safeguarded Land.

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)**

There should be a separate policy providing an uncomplicated mechanism, by which Safeguarded Land can be released reasonably expeditiously when it is needed.

The remaining ADRs (except Perryfields and Whitford) should be (re)designated as Safeguarded Land.

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Signature: 

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Name or Organisation (see Note 8 para 4.1)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 29	Paragraph:	Policy: BDP5A.4
Policies Map:	Other document:	

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

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(2) Effective (see Note 5)	not	<input type="checkbox"/>
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The local centre should also be able to accommodate small offices generally, not merely shop-type offices, also small medical facilities (such as dentists and physiotherapists); a doctors' surgery that may be needed. A target of 1300 dwellings suggests a population approaching 5000, which in turn suggests a medical practice with four doctors. The community facilities will probably need to include a community hall or church or both. The viability of a local centre is enhanced by as many of these uses as possible clustering together, as a person needing to visit one will find it easy also to use others. This can probably best be achieved by means of a cross-reference to the (new) policy on Local Centres: that policy directly relates to Village Centres, but it would be appropriate to apply it here.

It is also important to ensure that the Centre is actually built, unlike what happened on the Oakalls development in the early 2000s.

It is far from clear why the Local Centre shown on the Master Plan for the Oakalls was never built. Somehow, the negotiations over this between the main developer (Gallaghers) and a specialist developer of local centres broke down. The reasons for this were said to be commercially confidential.

It will be necessary that the continuation of housing development should be conditional on the provision of the local centre. If the local centre is not delivered at an appropriate stage in the house-building, there must be a sanction, such as development ceasing until the centre is provided. This may be that detailed planning approval will not be granted for a subsequent phase until progress has been made with the local centre.

Due to its size and the likelihood of it being in multiple ownerships, it is probably desirable that the Perryfields site should be the subject of a separate Plan, which (after examination) would be adopted as a SPD. Policy BDP5A.4 should require this. This may slightly delay the development of this site, but with planning consent granted for almost all other available sites, there is a risk that development will take place faster than intended by the Plan leading to a land-supply gap at the end of this decade or the beginning of the next, due to the headlong spurt in granting planning consent for large sites in the last couple of years. Delaying the development of the Perryfields is thus perhaps not a bad idea. It is to be hoped that this will prevent another cycle of boom and bust in the District's Housing Land Supply.

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)

Add:

The Council will prepare a separate Plan (to be adopted as a SPD) to provide more detail on the development of the Perryfields site.

Some conditionality must be imposed to ensure that the Local Centre is actually delivered.

The text could be simplified by referring to a Local Centre of the type described in Policy BDP18, rather than setting out in detail here what a Local Centre should contain.

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Name or Organisation (see Note 8 para 4.1)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 46-47	Paragraph:	Policy: BDP6
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: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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Do you consider the BDP is **unsound** because it is not:

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(2) Effective (see Note 5)	Potentially not effective	<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)

This policy is fine in principle. However, it will be difficult to determine whether the Plan is or is not sound, unless at least a draft CIL document is available before the Plan is examined. It may be necessary for this to be a draft that still has to be subject to fuller

consultation.

The work on Community Infrastructure appears so far only to have referred to Transport Infrastructure. However CIL is supposed to be about much more than that: it is in the name. There has been no assessment of the needs of particular communities. The comparatively deprived Central Area of Bromsgrove and Catshill should be able to attract funding much more easily due to its deprivation, than the prosperous areas of the commuter belt. The argument is that these are prosperous areas, and they can raise funding themselves, but there is no funding mechanism for doing that, other than philanthropy or charitable giving. Even prosperous communities should not be expected to have to rely on such means (rather than CIL) to meet their infrastructure deficits. The policy should require the needs of each community to be objectively assessed and to be prioritised across the district according to local needs, not comparative deprivation. The Plan provides for a supplementary CIL document.

The Plan needs to provide more detail on how this will be prepared. It was evident in recent planning applications in Hagley that the Council had no plan as to what new or replacement community facilities (such as halls) were needed and no mechanism for delivering these.

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)

The policy is merely enabling a further plan to be prepared. We are thus suggesting no changes.

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.

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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.

No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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)

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Signature

Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 48-9	Paragraph:	Policy: BDP7
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"/>	NO
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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)

We do not accept that the Plan is legally compliant, but this objection is not challenging that.

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)

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

Yes: <input type="checkbox"/>	No: <input type="checkbox"/>	NO
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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 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)

We support this policy. However there does not seem to be any mechanism for ensuring that it is in fact delivered. This has been supposed to be part of the emerging policy for some years, but BDC has hitherto not succeeded in applying its emerging DCS2 policy in this area. The policy should be amended to invoke specific targets based on data in SHMA. History shows that developers want to build a lot of 4 and 5 bedroom houses, because they are more profitable. However such larger houses are mainly needed for those moving out from the conurbations, not to meet the needs of the indigenous people of the district. This should be monitored, so that the Council can impose a moratorium on 4 and 5 bedroom houses (perhaps limited to specific areas) if the mere existence of the policy fails to produce results.

We wonder whether there should not be targets for homes for the elderly, including single-storey bungalows, as part of the general housing mix, to encourage those with an "empty nest" to downsize and free up larger homes for those who need them.

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)**

Add:

BDP7.3 The Council will monitor delivery by house size and will if necessary impose targets by a SPD, either for the whole district or particular areas of it.

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.


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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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Date: 11 November 2013

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

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Name or Organisation (see Note 8 para 4.1)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page:	Paragraph:	Policy:
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"/>	NO
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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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5. Do you consider the BDP is sound? (see Note 3)

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

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<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)

(1) In policy BDP8.1, The distinction between smaller brownfield sites of up to 200 houses (up to 30% affordable) and others (40%) is unjustified and hence unsound. Some brownfield sites are more expensive to develop, due to the need for site remediation in advance of development. The cost of this will vary considerably from site to site.

The requirement should be the same in all cases, but Policy BDP8.2 should not be limited to the exceptional. BDC should always be willing to negotiate a lower figure whenever that can be justified by the developer on grounds of viability.

- (2) The use of the phrase "up to" introduces vagueness into the policy. Up to 40 should cover anything in the range 1-40. The use of "up to" where "nearly" (or "almost") is meant is unfortunately common among journalists (as according with their practice of "simplify and exaggerate"), but it is no place in a planning policy document, where precision is necessary.
- (3) In BDP8.3 the tenure mix is required to take account of local needs, the housing mix in the local area, and the impact on viability. However, the Plan provides no mechanism for ascertaining what tenure mix is appropriate to a particular area. This may come from a Neighbourhood Plan, but (if there is none) a housing needs survey will be needed, using a procedure similar to that outlined in Policy BDP9.
- (4) With declining bus services, the provision of affordable housing in some areas may be unviable to any person without a car. In any such case, off-site affordable housing provision, in settlements with good public transport may be preferable.

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)

As indicated under 6

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.

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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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)

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Signature



Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 54	Paragraph:	Policy: BDP9
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"/> NO
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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)

We do not accept that the Plan is legally compliant, but this objection is not challenging that.

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)

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

Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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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 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)

Policy BDP9 fails (and ought) to provide that housing built under the policy should be allocated in accordance with the Council's Rural Housing Criteria. These criteria were developed in connection with a Rural Exception housing scheme at Belbroughton. Such housing is built to meet the needs of the village in question, and should be primarily used to meet those needs, not of housing list applicants generally. This is not intended to rule out the amendment of the Council's present Criteria, if expedient.

Policy BDP9.4 is welcome, but the possibility of allowing affordable housing in a hamlet other than the small villages listed in Policy BDP3.7 (such as Portway or Tardebigge) should not be completely ruled out, but this should be allowed only exceptionally. This is necessary because there are some portions of the district that are so rural that there are not even small villages.

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)**

Link the policy to the Council's Rural Housing Criteria.

Add BDP9.3 iii Exceptionally, in or adjoining a hamlet, being one not listed in Policy BDP3.

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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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)

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Date: 11 November 2013

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

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Name or Organisation (see Note 8 para 4.1)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 55-56	Paragraph:	Policy: BDP10
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"/> NO
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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)

We do not accept that the Plan is legally compliant, but this objection is not challenging that.

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

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

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)		<input type="checkbox"/>
(4) Positively prepared (see Note 7)	not	<input type="checkbox"/>

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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 57	Paragraph:	Policy: BDP11
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"/>	NO
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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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5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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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)	not	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	not	<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)

Policy BDP11 is appropriate, but is insufficiently flexible. The GTAA for Wyre Forest District identified a significant deficit that needed to be met within the next few years. Despite its title BDP11 makes no provision as to how the needs of Travelling Showpeople (which are different from other Travellers) would be dealt with.

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)

The policy should provide a mechanism for BDC to react to the findings of the next GTAA, by identifying sites that may be required, if necessary by a Supplementary Plan to be adopted in advance of the completion of the Green Belt Review.

The reference to "a full Green Belt Review" should be to the Green Belt Review provided for in Policy BDP4.

A small but urgent deficit could be met by applying the same principles as in Policy BDP9, with "Travellers' pitches or Travelling Showmen's sites" substituted for "affordable housing". It should not be necessary to repeat the detailed provisions in this policy, merely to make a cross-reference to the principles of BDP9.

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.


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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 66	Paragraph: 8.164	Policy:
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"/> NO
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Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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(1) Justified (see Note 4)		<input type="checkbox"/>
(2) Effective (see Note 5)	not	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	not	<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)

The problem exists that the need to conform to BDP will have the effect of stifling initiative locally that ought to be supported through Neighbourhood Plans. There should accordingly be an exception, enabling a Neighbourhood Plan to alter the boundary of the Green Belt in its area, if this is to meet a demonstrable local need in its area. This issue is mentioned due to an objection made by Churchill and Blakedown PC to a Wyre Forest Plan.

Conversely, if a Neighbourhood Plan identifies a need for (say) 50 houses in its area during the Plan Period, it should not be open to BDC to come along later and say, "Thank you very much, but we want 150." If BDC considered that 50 was an inadequate number, it should have objected to the Neighbourhood Plan when it came up for Examination. It must be born in mind that a Neighbourhood Plan has to pass a local referendum, and will therefore have greater democratic legitimacy than any district-wide Plan.

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)

Amend 4th line for the end to read:

... local affordable housing needs; or general housing needs, identified as necessary by a Neighbourhood Plan.

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.

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Name or Organisation (see Note 8 para 4.1)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 67	Paragraph:	Policy: BDP15
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"/> NO
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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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5. Do you consider the BDP is sound? (see Note 3)

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

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<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)

BDP15.1c: This policy is less precise than the Local Plan policy that it replaces. That rest

seemed to operate well. It will be recalled that there was an application concerning redundant chicken sheds at Portway some months ago, wooden buildings with a base and part of the walls of concrete. The buildings should be required to be:

of substantial construction and capable of conversion without substantial reconstruction or structural alteration.

The examples given are appropriate, but the underlying principle should be more clearly set out.

Policy BDP15.1h is not clear: is this about the reuse of agriculture-related brownfield land? Or does it permit infill within farmsteads? If the latter it is unacceptable; if the former the policy seems to add little to BDP15.1c. Even if this does add something to BDP15.1c, it would be better to combine them into a single policy. This paragraph (being uncertain in its meaning) is presumably unsound; alternatively it is not legally compliant as void for uncertainty.

Policy BDP 15.2 may deal with the objections raised to Policy BDP15.1, but the Local Plan provisions on the subject (its policy C27) need to be explicitly preserved until the proposed new SPD is adopted. Appendix IV needs to explain more precisely how this transitional provision is to be applied, pending the adoption of a SPD on the subject.

Policy BDP4.4c (which concerns extensions to property in the Green Belt) ought properly to be part of this policy (not BDP4), as a matter of consistency.

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

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)

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Signature: 

Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page: 88-89	Paragraph:	Policy: BDP18
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"/>	NO
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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)

We do not accept that the Plan is legally compliant, but this objection is not challenging that.

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)

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

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

(1) Justified (see Note 4)	not	<input type="checkbox"/>
(2) Effective (see Note 5)	not	<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)

Policy BDP18 is generally welcome. However:

- Small scale medical facilities (such as dentists, chiropodists, and physiotherapists), which are technically not retail or office uses, should normally also be located within or adjoining village centres. Their presence helps to reinforce the vitality of the centre.
- The requirement that the shopping area should not be extended is over-restrictive. Extension of the area should be permissible, if a no site within the designated area can be found, but subject to a sequential site search test. Any extension should be immediately adjacent to the existing shopping area. Any new shop in such a location should be of a size comparable with existing shops, for example not exceeding a certain area. Wyre Forest District has recently adopted a maximum of 280 m², which I understand to be a threshold used in the Sunday Trading legislation.
- The possibility of single “corner shop” general stores elsewhere should also not be ruled out, but:
 - Again, a maximum size (such as 280 m²) will be needed, so that this does not become a pretext for creating out-of-centre retail warehouses.
 - A threshold minimum distance from the edge of a local centre (such as 800 metres) is probably desirable.
 - It may be necessary that there should be a condition that they should be general (not specialised) retailers.

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)

Changes are required as outlined in 6 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 type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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)

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Signature



Date: 11 November 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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page:	Paragraph: 8.254	Policy: Table 6
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"/> NO
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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)

We do not accept that the Plan is legally compliant, but this objection is not challenging that.

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)

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

Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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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)	not	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)		<input type="checkbox"/>
(4) Positively prepared (see Note 7)	not	<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)

After all the effort put in by volunteers in preparing Village Design Statements (some of which have been adopted as SPDs) and Parish Plans (none of which have been). Having not been adopted the latter bear little weight, but their existence should nevertheless be mentioned.

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)**

The tool kit should additionally require compliance with any adopted Village Design Statement (unless obsolete) and regard to be had to any Parish Plan (whether or not adopted, unless obsolete).

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.


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No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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)

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Signature 	Date: 11 November 2013
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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)

Campaign to Protect Rural England (Worcestershire Branch)

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

Page:	Paragraph:	Policy: Appendix IV
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"/> NO
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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)

We do not accept that the Plan is legally compliant, but this objection is not challenging that generally. However, the nature of how old Local Plan policies partial revoked or partially superseded is unclear, even whether these are the same or different. This potentially produces uncertainty, which is liable to render provisions void. Plans are (or ought to be) certain.

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)

See 6 & 7 below.

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

Yes: <input type="checkbox"/>	No: <input type="checkbox"/> NO
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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)	not	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)		<input type="checkbox"/>

(4) Positively prepared (see Note 7)	not	<input type="checkbox"/>
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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)

With the vast majority of the Local Plan superseded, either by BDP or by their not having been kept in 2007, it would be useful for the appendix also to list (with their text) the modest number of older policies that remain in force. This will increase the legibility of the Plan. This is particularly important where an older policy is stated to be *partly* superseded: in that case its continuing applicability needs to be expressed. Since the plan anticipates that certain new SPDs will be prepared, it would be useful if the Appendix could indicate how it is proposed that the surviving elements are to be replaced.

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)

For each policy that is only partially revoked or superseded, Appendix IV should explain the relationship between the new and old policies. For example:
 Local Plan Policy will remain in force (so far as it is consistent with Policies BDP1, BDP4, BDP15, BDP16 and BDP19) until the Council adopts a new SPD on rural buildings.

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.

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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.*

No, I do not wish to participate at the oral examination	<input type="checkbox"/>	
Yes, I wish to participate at the oral examination	<input type="checkbox"/>	YES

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)

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Signature:



Date: 11 November 2013