

**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)

**CPBigwood Ltd**

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

Page:	2 to 5	Paragraph:	1.1 to 1.27	Policy:	Introduction and Context
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:

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)

**On behalf of our Clients, Mr S Jones and Mr J Matthews, we have enclosed a Background Housing and Housing Land Review Statement in respect of their two sites, one fronting Birmingham Road, Alvechurch and one in Groveley Lane, Longbridge, Birmingham, setting out representations in respect of housing and housing-related policies in the Bromsgrove Local Plan and which is attached.**

**Whilst we believe that Bromsgrove DC have provided a good summation of the policy framework to its District Plan, we consider that it fails in terms of 'Compliance' on one fundamental principle: the Duty to Co-operate (DTC).**

**Attendance at the recent Examination Hearings for the South Worcestershire Development Plan and the re-opened Solihull Metropolitan Borough Council Local Plan saw lengthy debate on the fact that Birmingham City Council had not, at the time of those Examinations, had its Development Plan approved for consultation by its Cabinet on the 21<sup>st</sup> October. The lack of information on the housing numbers required by Birmingham CC led to very serious debates on 'Duty to Co-operate Compliance' in respect of those development plans which posed considerable concerns for those Independent Inspectors.**

**Until the housing shortfall in Birmingham's administrative district has been determined and agreed none of the authorities adjoining Birmingham's administrative boundary can properly, justifiably or positively plan for the Birmingham housing shortfalls that must be addressed to inform their Development Plans and the work undertaken as part of the GBSLEP.**

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)

**To ensure legal compliance, Bromsgrove DC must have meaningful discussion with Birmingham CC on housing provision which cannot happen until Birmingham has formally agreed those numbers. If full DTC compliance does not take place, then we believe a similar scenario to the South Worcestershire and Solihull Independent Examinations will be evidenced at the Independent Examination of the Bromsgrove District Plan if Birmingham CC's housing numbers are not properly identified and addressed positively.**

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

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

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

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

**We set out above in 3 above reasons why the DBP is unsound in compliance terms. If the compliance issues are not addressed then the Bromsgrove Development Plan must be found to be 'unsound' as Birmingham CC's housing shortfall numbers have not been taken into account as part of the Duty to Co-operate.**

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)

**Given our submission that Bromsgrove DC requires substantial additional housing land provision to meet the expected need, the present Local Plan housing figures need amendment and there needs to be consequential land allocations.**

**In addition those settlements that are capable of accommodating additional housing growth, such as at Alvechurch, without unreasonably compromising the sound planning of the area should be identified and provision made accordingly.**

**We consider that additional landholdings on the boundary of the Bromsgrove and Birmingham administrative areas should be identified and brought forward for release to fulfil Bromsgrove's duty to assist in the provision of overspill housing from Birmingham CC housing.**

*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 checked="" type="checkbox"/>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

**Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers.**

Signature:



Date: 11<sup>th</sup> 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)

CPBigwood Ltd

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

Page:	6 to 10	Paragraph:	2.1 to 2.31	Policy:	District Profile
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:

3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

The Local Plan fails to plan positively for future growth and for the Elderly within the Plan period.

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)

The Plan should be amended accordingly in line with our submissions in paragraph 6 below.

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

Yes:

No:

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

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

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We have reviewed the Social Characteristics contained within the BDP, particularly the demographics related to the Elderly, allied specifically to the significant projected increase of the 65+ age group in the Plan period to 2030. We have noted the provision of housing 'suitable for the Elderly', identified at Key Challenge 4, and are pleased to see the provision of policy BDP10: Homes for the Elderly. However we record that in our view the Plan does not identify sufficient provision within it to accommodate the substantial need in housing terms to meet this very considerable need. Frankly the Plan needs to identify strategic releases and

not just rely upon the vague possibility that the "market" ie national house builders etc will provide such accommodation in bringing their strategic housing schemes forward. The identification of land for Continuing Care Retirement Communities and market provision for the Elderly under both Use Classes C2 and C3 respectively should be identified both in numbers and locations to meet this unquestionable high need in the Plan period. In addition we must question if sufficient housing will be delivered to mitigate against the substantial increase in that age range, especially those Elderly who are in need of care.

As identified at the South Worcestershire Local Plan Hearing the Borough needs to make provision for both C2 and C3 housing to cover the wide spectrum of requirements for the Elderly.

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 Plan needs to be amended to take account of our submissions in paragraph 6 above.

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Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly

Signature:



Date: 11<sup>th</sup> 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)

CPBigwood Ltd

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

Page:	11 to 13	Paragraph:	3.1 and 4.12 to 4.13	Policy:	Key Challenges and Vision
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:

3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

**The Key Challenges do not properly identify the range of scenarios for growth albeit that in paragraph 3.1 3) it does state that the Plan should meet the growth needs without adequately or properly defining what those are. Generally we accept the Key Challenges but must record here that those Key Challenges have not reasonably and soundly been met in the production of this Local Plan, hence our representations.**

**In terms of the Vision, in reading paragraphs 4.1 to 4.13 it must be concluded that that was an aspirant Vision and more reflects hope than it does positive planned growth to meet those aspirations and the Key Challenges and therefore the Plan falls and is not therefore sound.**

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)

**The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.**

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

Yes:

No:

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

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Generally we embrace the Vision for Bromsgrove District as provided in the BDP in terms of sustainability and economic development, subject to our comments in 3 above. However aspirations must be seen in policy terms to be provided and hence deliverable within the Plan period. This is particularly so in terms of the provision of a Policy for the Elderly enabling those Elderly to age in place in a safe environment with their friends particularly in the larger, sustainable settlements. However, it is acknowledged nationally that funding for that government initiative is severely limited and the private sector is having to provide substantially more provision for the Elderly in terms of Continuing Care Retirement Communities, Extra-Care provision, Independent Living and Sheltered Housing. Further, some Elderly housing provision will have to be Affordable and thereby by rent rather than by purchase. There is a failing in the Plan in not properly addressing these very important issues at this time based upon the very considerable need identified by BDC.

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 Plan needs to be amended to take account of our submissions in paragraph 3 above and 6 below.

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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)

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly.

Signature:  Date: 11<sup>th</sup> 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)

CPBigwood Ltd

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

Page:	14	Paragraph:	5.1	Policy:	Strategic Objectives
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:

3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

**The Strategic Objectives do not include the need for a more appropriate review of housing provision within the District as a whole. Whilst focusing new development in sustainable locations on the edge of Bromsgrove might be appropriate in part, the Objectives need to focus on all settlements that can properly accommodate reasonable growth. There is no focus on the hierarchy of settlements for the growth which there should be. Strategically Objective SO4 really does not go far enough in covering all requirements necessary for this District within the Plan period. Again, Objective SO5 gives very little detail whatsoever to the aspirations of the Council as to the types of new businesses that it might wish and where those are to be accommodated.**

**As a whole the Strategic Objectives are not translated properly and appropriately into the policies that have now been proposed for the District in this Local Plan and it can be said that some of those Strategic Objectives cannot be met in part in a number of cases.**

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Yes:

No:

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

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x



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7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)

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No, I do not wish to participate at the oral examination	<input type="checkbox"/>
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Signature:  Date: 11<sup>th</sup> 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)

CPBigwood Ltd

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

Page:	17	Paragraph:		Policy:	<b>BDP1: Sustainable Development Principles</b>
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: x

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)

**There is no shadow of doubt that Bromsgrove will have to provide substantial additional housing land and it will need to look at the boundary with Birmingham City Council, and land in sustainable villages such as Alvechurch that can be released without demonstrable harm. This is particularly so in the case of proper housing provision for the Elderly where sustainable parcels of land are important in the context of access and facilities.**

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)

**The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.**

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

Yes:

No: x

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

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(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
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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)

**We have reviewed the principles of Policy BDP1: Sustainable Development Principles. However, given that BDC will require substantial additional housing, these sustainable principles may need revision to properly reflect the NPPF as it appears that some of the sub policies are not NPPF-compliant.**

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 Plan needs to be amended to take account of our submissions in paragraph 3 above and 6 below.**

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Signature

Date: 11<sup>th</sup> 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)

CPBigwood Ltd

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

Page:	18 - 20	Paragraph:	8.9 – 8.17 and Table 2	Policy:	BDP: Settlement Hierarchy
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: x

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**Generally we accept the basis of the settlement hierarchy in Police BDP2 except for the fact that BDC should be making provision for housing to accommodate the necessary housing needs of Birmingham beyond its boundary and therefore Policy BDP2 should be amended with a new sub clause to include the provision of new housing and employment land around the southern boundary of the City of Birmingham within Bromsgrove's administrative area.**

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**The Plan is unsound because Bromsgrove have not properly reflected cross boundary issues with the City of Birmingham or taken account of any need that is clearly required by Birmingham for additional housing growth in the Bromsgrove District to satisfy that acknowledged substantial housing need by the City of Birmingham.**

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)

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Date: 11<sup>th</sup> November 2013

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Name or Organisation (see Note 8 para 4.1)

**CPBigwood Ltd**

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

Page:	21	Paragraph:	8.1 to 8.27	Policy:	<b>BDP3: Future Housing and Employment Growth</b>
Policies Map:		Other document:			

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

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

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

**We would refer to our Background Housing Statement and our contention that under Policy BDP3 future housing growth is substantially under-provided for the District within the Plan period for the reasons given in that Statement. In addition we have reserved the position to present a further Background Housing Statement once our sub-consultants have reported back relative to the most likely household formation for the District within the Plan period, the effect of the economic upturn, the under-provision of employment land and the consequential need to balance, as far as possible, housing land and employment land proposals, the likely need to accommodate some of the Birmingham City Council housing need within this District, and the need to properly provide for the Elderly as a consequence of the demographics for the District and the under-provision of affordable housing.**

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)

**The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.**

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

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

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

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

**We have referred within this submission to the lack of proper housing provision at the right level for the District as a whole consequent upon the proper demographics, and an economic policy of stimulation for the District as a whole in line with present government advice and in line with the proposals that were evident in Draft Core Strategy 2 and its related policies. For all of these reasons, as referred to in our Background Statement, the Plan has not been positively prepared, cannot be properly justified and is not effective because it has not been based upon proper, effective joint working on cross boundary strategic priorities. We are not assured that Bromsgrove have carried out effective and proper consultations on the Duty To Co-Operate.**

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 Plan needs to be amended to take account of our submissions in paragraph 3 above and 6 below.**

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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

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

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

**Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly.**

Signature



Date: 11<sup>th</sup> 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)

CPBigwood Ltd

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

Page:	23	Paragraph:	8.28 to 8.39	Policy:	BDP4: Green Belt
Policies Map:		Other document:			

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

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

Yes:

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)

**We have made a number of submissions in respect of other Policies and in particular those Policies relating to housing, employment, provision for the Elderly, rural renaissance, etc. The consequences of those submissions will require amendments to the Green Belt Policy. Therefore the physical boundary of the Green Belt, as indicated on the Policies Map, will need amendment.**

**In terms of the submissions made in respect of the expected higher requirements for new housing and employment land, we would submit that the present Local Plan is not sound at this point in time because a proper and reasonable Green Belt Review has not taken place. It is irresponsible to indicate that that Green Belt Review should not commence until 2023 when it is already known that the City of Birmingham will require housing and employment land in Bromsgrove to meet their known targets. Frankly the present Plan should be declared unsound and the Green Belt Review started immediately.**

**Finally it needs to be acknowledged that provision for the Elderly, both C2 and C3, may need to be accommodated adjoining the major settlements in Bromsgrove and there ought to be a sub-Policy allowing that to happen, subject to justification of the demographic need.**

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)

**The Plan should be amended accordingly in line with our submissions in paragraph 3 above and 6 below.**

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

Yes:

No:

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

(1) Justified (see Note 4)



(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

**We have set out in 3 above the basis of our submissions. Consequent upon those housing and employment submissions the Green Belt boundary, as presently shown, cannot be acceptable and the Plan is therefore unsound as such. The basis of the Green Belt Policy in BDP 4 needs consequential amendments as in 3 above and we have set out the reasons why, in our view, it is not sound. Firstly it has not been properly and objectively assessed in terms of the development needs and neither is it consistent with achieving sustainable development to have a Green Belt Policy in the form set out in BDP 4. Neither is BDP 4 justified because the Plan is not founded upon a proper robust and credible evidence base and neither were there proper and reasonable alternatives with a credible strategy. Therefore the implications of BDP 4 require substantial amendments to the Plan to provide the necessary development and opportunities to fulfil the economic requirements of the District as required by present government strategy and by the policies of the LEP and GBSLEP. The Plan is therefore 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)

**The Plan needs to be amended to take account of our submissions in paragraph 3 above and 6 below.**

*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	x

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)

**Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which could be released for development, mostly identified throughout the emerging Development Plan process.**

Signature: 

Date: 11<sup>th</sup> 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)

CPBigwood Ltd

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

Page:	32-34	Paragraph:		Policy:	BDP5 B) Other Development Sites
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:

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)

**It is considered that this paragraph is not legally compliant as at least one of the housing allocations has been developed and the plots sold.**

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)

**To avoid misunderstanding this policy should be re-worded to state that the site(s) in question is no longer available.**

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

Yes:

No:

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

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

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

**Paragraph 8.62 and Table 3 cannot meet tests (1), (2) and (4) above as the housing units have been completed and sold. The policy should be amended to reflect this.**

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)

**Paragraph 8.62 should reflect that this parcel of land has been fully constructed and its housing allocation is not therefore available.**

*Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*


**After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.**

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

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

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

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Signature: 	Date: 11 <sup>th</sup> 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)

CPBigwood Ltd

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

Page:	48 - 49	Paragraph:	8.87 to 8.97	Policy:	BDP7 Housing Mix and Density
Policies Map:		Other document:			

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

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

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

**This Policy does not refer to market demand or the requirements of the market. It should do so. BDC can only reasonably identify need through its housing waiting list. These waiting lists are notoriously inaccurate. Market demand is wider and more encompassing. Whilst BDC may wish to concentrate on 2 / 3 bedroom dwellings to accommodate some of the Elderly provision, there is a considerable need for 4 / 5 bedroom dwellings and in at least one large settlement some single bed dwellings. Both the market demand and need changes over time, sometimes year by year. This Policy is too prescriptive and each case must properly be dealt with on the merits of the application and the location of the site at that time. There is no reference in Policy BDP 7 to a requirement for housing for the Elderly in need of care. Some of this will be 1 bedroom and some of it will be 3 bedroom, the third bedroom as a visitor bedroom. Neither does this Policy include any form of institutional, Class C2, provision by reference.**

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)

**To avoid misunderstanding, this Policy should be re-worded to include reference to the submissions in 3 above.**

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

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

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

**The Policy is not soundly based or in line with NPPF / present government advice based upon the submissions above.**

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 changes identified above will provide a more robust, credible and proper base for this Local 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.*


**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	
Yes, I wish to participate at the oral examination	x

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)

**Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which should be released for development, and they believe that it would be most appropriate to make a presentation orally.**

Signature: 

Date: 11<sup>th</sup> 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)

**CPBigwood Ltd**

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

Page:	<b>50 – 52</b>	Paragraph:	<b>Policy itself</b>	Policy:	<b>BDP8 Affordable Housing</b>
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:

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)

**Policy BDP 8.5 should be removed from this Policy and inserted into Policy BDP10: Homes for the Elderly, where it is more appropriate. The wording does not refer to the heading on this Policy!!**

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)

**Delete sub-Policy BDP 8.5**

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

Yes:  No:

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

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

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

**See justification in 3 above.**

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)

Delete sub-Policy BDP 8.5 as it is not appropriate and therefore no sound.

*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	
Yes, I wish to participate at the oral examination	x

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)

Our attendance is necessary as our Clients have several landholdings in Bromsgrove's administrative area which should be released for development, and they believe that it would be most appropriate to make a presentation orally.

Signature:



Date: 11<sup>th</sup> 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)

CPBigwood Ltd

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

Page:	55 and 56	Paragraph:	8.119 to 8.128	Policy:	BDP10: Homes for the Elderly
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:

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 support the thrust of this Policy. In BDP 10.3 there needs to be amended to include the wording, "nursing homes", "residential homes for the Elderly" and "sheltered housing", all of which provide accommodation for the Elderly to meet the required substantial need. Most often Elderly housing is provided by Specialist housing providers and BDC must include a reference to the provision of such accommodation on the edge of the larger settlements where those settlements have tight Green Belt boundaries and where provision for the Elderly could be made sustainably and without undue harm to the Green Belt..**

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)

**Policy BDP 10.3 needs consequential amendment in line with 3 above.**

**Policy BDP 4: Green Belt needs consequential amendment to provide for sites for the Elderly on the edge of the larger settlements presently in the Green Belt.**

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

Yes:

No:

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

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)



**We have reviewed Bromsgrove's Policy for the Elderly, the demographic statistics which underpin this Policy and the need for a 'dramatic change in house building in the District' to provide alternate forms of housing provision for the Elderly. This should be applauded.**

**However there are circumstances in which the Elderly will require more specialised housing that includes the provision of care. CCRCs have been instrumental in providing a range of housing choices from 'entry level' care requirements to specialist units within those villages for Alzheimer / Dementia-related illnesses where there is a requirement for the housing units to be of a larger size overall to cater for the equipment which may be required to dispense the care requirement.**

**In providing CCRC villages it should be borne in mind that in addition to the specialist level of housing, those villages additionally fulfil primary / tertiary employment needs as care is on a 1:1 basis. The minimum 60/70-bed care home element of a CCRC can provide 70-100 jobs which is not insubstantial therefore fulfilling social and economic development in a sustainable settlement such as Alvechurch.**

**Policy BDP 10 needs consequential amendment based upon 3 above and our submission above.**

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)

**Consequential amendments to the details of Policy BDP10 and Policy BDP 4: Green Belts.**

*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	
Yes, I wish to participate at the oral examination	x

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)

**Our attendance is necessary as our various Clients have landholdings in Bromsgrove's administrative area which should be released for development, mostly identified through the SHLAA process. These landholdings will be of vital importance in bringing forward sufficient land in the Plan period to 2030 to enable Bromsgrove to deliver its housing numbers and housing for the Elderly as well as related Affordable housing.**

Signature: CPBigwood

Date: 11<sup>th</sup> 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)

**CPBigwood Ltd**

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

Page:	108 to 111	Paragraph:	8.303 to 8.321	Policy:	<b>BDP 23: Water Management</b>
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:

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 would request a review of this Policy, particularly in terms of the effect of some of the sub-Policies under BDC 23.1 and their effect upon small businesses and small development schemes where the consequential, financial and economic impacts of those requirements would be considerable and might in fact render the project unviable.**

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)

**We would request reconsideration of this Policy in the light of our submissions in 3 above. As the country has only recently started to grow economically imposition of some of these requirements will be unacceptable.**

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

Yes:  No:

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

(1) Justified (see Note 4)	x
(2) Effective (see Note 5)	x
(3) Consistent with national policy (see Note 6)	x
(4) Positively prepared (see Note 7)	x

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

**For the reasons set out in 3 and 4 above we would request reconsideration and revision where necessary to provide assurance to the business community and our Clients.**

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)

**Please see 6 above and our submissions in 3 and 4 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 checked="" type="checkbox"/>

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

**Based upon our submissions above it may not be necessary to orally examine Policy BDP 23 depending upon the consequential revisions after review.**

Signature:



Date: 11<sup>th</sup> November 2013



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## BROMSGROVE LOCAL PLAN PROPOSED SUBMISSION VERSION

## BACKGROUND STATEMENT HOUSING AND HOUSING LAND PROVISION

2011-2030

Regulated by RICS

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## 1. BACKGROUND

- 1.1. On behalf of our Clients, Mr S Jones and Mr J Matthews, we submit this Housing Statement in respect of their two landholdings referred to as BDC151 and BDC226 in the Bromsgrove SHLAA, being Land fronting Birmingham Road, Alvechurch and Land fronting Groveley Lane, Longbridge, Birmingham respectively.
- 1.2. In terms of housing provision, the focus of attention is really contained in paragraph 8.19 with the statement by Bromsgrove District Council (BDC) of "... *In determining the potential housing requirement for the District, a range of scenarios were tested with the most realistic being migration-led and employment-constrained scenarios which identified a net dwelling requirement ... 6,780 respectively.*" "... *On this basis a housing target of 7,000 was proposed for the 19 year Plan period.*"
- 1.3. This shows BDC adopting a very restricted and constrained proposal, effectively housing-led.
- 1.4. It is noted in paragraph 8.20 that BDC must maintain a 5-year supply of housing land and that they will "initially" seek to maintain a buffer of 5% in addition to the 5-year land supply. Subsequent paragraphs under Policy BDP3: Future Housing and Employment Growth sets out a breakdown of the housing target as in paragraph 8.22. However it is noted in the Plan that some 2,400 homes remain to be identified, to be delivered within the Plan period in order to meet the housing target of 7,000 homes by 2030. It is clear that BDC can only achieve their full housing target by a release of Green Belt land through a full Green Belt review which is alluded to in the Plan as being between 2023 and 2030.
- 1.5. We note from Chapter 4 of the Plan where it explains the Vision of BDC that it wishes effectively to continue the "status quo" of the District during the Plan period. There is no reference to new growth initiatives but there is reference in paragraph 4.6 that BDC "... *will have achieved more balanced housing market and be continuing to deliver the required level of housing growth to meet local needs ...*" in the next 15 to 20 years.
- 1.6. What is clear from the Plan is that there appears to have been no modeling undertaken through proper alternative scenarios of the District for the Plan period. Certainly it is not recorded and this is unlike the South Worcestershire Development Plan. In effect this is a protectionist Local Plan reflecting more on the need to protect the Green Belt rather than properly reflect the proper employment needs of the District through the existing businesses and the need to attract new businesses or properly addressing the very substantial need for housing accommodation for the Elderly as shown through the demographics for the District over the next 20 years. These demographics show a very considerable rise in the need for specialist and non-specialist residential accommodation for the Elderly and provision must be made in the Development Plan policies to accommodate this.
- 1.7. The Inspector's Preliminary Findings in the South Worcestershire Development Plan are particularly important in the context of the Bromsgrove Local Plan, in requiring those authorities to look again at the basic provision for housing, taking into account proper and reasonable modeling for a robust strategy that is appropriate for that area. Whilst BDC have taken a very simplistic view for their housing need, ie their 7,000 dwellings, the underpinning basis for their reasoning in achieving that figure does not appear sound and reasonable in the context of proper Development Plan policies.
- 1.8. In our view BDC need to make provision for a very substantially increased figure well above the 7,000 dwelling level at this time irrespective of the overspill needs of the City of Birmingham which will be quantified in due course.

- 1.9. In our view the Plan as submitted cannot possibly meet the objectively assessed development and infrastructure requirements because the authority have not undertaken a rigorous and proper objective assessment. In addition BDC have not positively and properly prepared their Plan because it is not consistent with achieving proper and reasonable sustainable development to meet the long-term needs of the District and its inhabitants.
- 1.10. In terms of justification the Plan cannot possibly be said to be founded on a robust and credible evidence base and even their outdated base has causes for concern. There is no proper economic modeling and neither is there any proper housing and population modeling. South Worcestershire had modeling for both of these albeit that they were found to be gravely wanting by the Inspector in his Initial Recommendations. Most importantly we see very little proper reasoned approach by BDC to formulating the most appropriate strategy from a series of alternatives. Where are the alternatives? Where is the justification for choice from these?
- 1.11. In terms of effectiveness, there is no reasoned justification for "deliverability of the Plan" but of course because BDC have adopted a minimalist approach they are bound to deliver this strategy by default but that does nothing to underpin a proper and reasonable future for the District as a whole.
- 1.12. From discussions at the Solihull, Lichfield and South Worcestershire Local Plan Hearings the Duty To Co-Operate goes hand-in-hand with the need for effective joint working across boundaries to identify strategic priorities for those concerned. We raise at this time substantial doubts on both counts of failing the Duty To Co-Operate but also failing to work on cross boundary issues. BDC should be asked to provide proper statements clearly identifying where they have started to co-operate and with whom, and when they started the cross boundary working, particularly in the case of the City of Birmingham and its requirement for very substantial housing provision outside its boundary.
- 1.13. We reserve the right to submit an additional Housing and Housing Land Review Statement following further detailed analysis of the background documents by our consultants.

November 2013