

Borough of Redditch Local Plan No.4 Proposed Submission Document

Representation Form

Please return by 5pm on Monday 11th November 2013

Redditch Borough Council is asking for representations on its Proposed Submission version of the Borough of Redditch Local Plan No.4 (BORLP4), which outlines the strategic planning policy framework for guiding development in the Borough up to 2030. It comprises a long-term spatial vision and strategic objectives, a spatial strategy, core policies, strategic and non-strategic site allocations, and a monitoring and implementation framework. The Plan also includes a copy of the Redditch Cross Boundary Development policy (Appendix 1), which appears in the Bromsgrove District Plan as Policy RCBD1.

Whether or not you have been involved in any of the earlier stages of the plan making process, there is still the opportunity to be involved by commenting on the legal compliance or soundness of the Plan. Any representations should be made using this Form and **returned by 5pm on Monday 11**th **November 2013** to:

Development Plans Team Redditch Borough Council Walter Stranz Square Redditch Worcs B98 8AH

Or emailed to: devplans@redditchbc.gov.uk

Please complete a separate form for each representation you wish to make

This form has two parts:

Part A: Personal Details

• You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.

Part B: Your representations

- Please complete Part B of this form for each representation you wish to make.
- You do not need to complete Part A more than once, but please ensure you state your name or organisation as applicable at the top of each Part B form you submit.
- Please refer to the attached Guidance Notes on making representations so that they address issues of legal compliance and/or soundness.

Please note that when representations are submitted Part B of the form will be published and therefore cannot be treated as confidential. Contact details on Part A will not be published.

Part A (see Note 8)

How we will use your details:

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 1998. It will be used only for the preparation of local development documents or any subsequent statutory replacement. However, your name and representation will be made publicly available when displaying and reporting the outcome of the consultation stage, and cannot be treated as confidential. Other details including your address and signature will be treated as confidential.

Personal Details	Agent's Details (if applicable)
Title:	Title: Mr
First Name:	First Name: Mark
Last Name:	Last Name: Sackett
Job Title: (if applicable)	Job Title: Senior Director (if applicable)
Organisation: Persimmon Homes South Midlands	Organisation: RPS Planning & Development (if applicable)
Address 1: C/O Agent	Address 1: Highfield House
Address 2:	Address 2: 5 Ridgeway
Address 3:	Address 3: Quinton Business Park
Address 4:	Address 4: Birmingham
Postcode:	Postcode: B32 1AF
Telephone No:	Telephone No: 0121 213 5500
Email address:	Email address: mark.sackett@rpsgroup.com

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Please	tick the boxes below if you wish to be notified at any of the following Local Plan stages:
$\Box X$	that the BORLP4 has been submitted for independent examination
$\Box X$	the publication of the recommendations of the person appointed to carry out an independent
	examination of the BORLP4
$\Box X$	the adoption of the BORLP4

If the notification address is different to that stated above, please specify here:

Your details will remain on our database and will be used to inform you of future Policy Planning matters and procedures following the adoption of BORLP4. If at any point in time you wish to be removed from the database, please contact us and we will remove your information.

Please use a separate Part B form for each representation you wish to make

Name or Organisation (see Note 8 para 4.1)

Persimmon Homes South Midlar	nds		
1. To which part of the BORLP4 d	oes this represent	ation relate?	
Page: Whole Plan	Paragraph:		Policy:
Policies Map:	Other document:		,-
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3. Please give details of why you as possible. If you wish to support set out your comments. (Continue o	the legal complia	nce of the BORL	P4, please also use this box to
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5. Do you consider the BORLP4 is	s sound? (see Not	te 3)	
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Do you consider the BORLP4 is u (1) Justified (see Note 4) (2) Effective (see Note 5) (3) Consistent with national police (4) Positively prepared (see Note	y (see Note 6) e 7)	X	
6. Please give details of why you of you wish to support the soundness.			Please be as precise as possible. se this box to set out your

Lack of paragraph numbering and choice of colour scheme that means the plan must be printed in colour in order to be legible.

comments. (Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider nect to the test you have identified at 6 above. You will r BORLP4 sound. It will be helpful if you are able to policy or text. Please be as precise as possible. (Co Note 8 para 4.3)	need to say why this change will make the out forward your suggested revised wording of any
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Signature: <i>CM Sackett</i>	Date: 11, 11, 13

Name or Organisation (s	see Note 8 para 4.1)	
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Page: 5	Paragraph: 2 and 3	Policy: Duty to Co-operate
Policies Map:	Other document:	1. oney. Buty to do operate
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2. Do you consider the E	BORLP4 is legally compliant? (see No	ote 2)
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•	BORLP4 is sound? (see Note 3)	
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Do v	ou consider the	BORLP4 is	unsound	because it is no	ot:
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(1) Justified (see Note 4)	
(2) Effective (see Note 5)	
(3) Consistent with national policy (see Note 6)	
(4) Positively prepared (see Note 7)	

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Commitment to review the Plan to deal with Birmingham related development is welcomed. This requires a similar approach from Bromsgrove District as Redditch's role in the wider GBSLEP area is likely to have cross-boundary implications for Bromsgrove District.

Cross-boundary approach with Bromsgrove District Council in this Plan is supported in principle as compliant with the Duty to Co-operate.

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard
to the test you have identified at 6 above. You will need to say why this change will make the
BORLP4 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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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	Χ
Yes, I wish to participate at the oral examination	

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)	

Signature: CM Sackett Date: 11, 11, 13

Please use a separate Part B form for each representation you wish to make

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Persimmon Homes South Midla	nds	
1. To which part of the BORLP4	does this representatio	n relate?
Page: 20	Paragraph:	Policy: Objectives
Policies Map:	Other document:	,
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Do you consider the BORLP4 is **unsound** because it is not:

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

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)				
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7. Please set out what change(s) you consider nece to the test you have identified at 6 above. You will r BORLP4 sound. It will be helpful if you are able to policy or text. Please be as precise as possible. (Co Note 8 para 4.3)	need to say why this change will make the but forward your suggested revised wording of any			
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Signature: @ M Sackett	Date: 11.11.13			

Yes: In part

Please use a separate Part B form for each representation you wish to make

Name or Organisation (see Note 8 para 4.1) Persimmon Homes South Midlands 1. To which part of the BORLP4 does this representation relate? Page: 21 Paragraph: Key Diagram 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 BORLP4 is legally compliant? (see Note 2) Yes: X No: 3. Please give details of why you consider the BORLP4 is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary) 4. Please set out what change(s) you consider necessary to make the BORLP4 legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BORLP4 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 BORLP4 is sound? (see Note 3)

Do you consider th	ne BORLP4 is	unsound	because	it is	not:

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

(4) Positively prepared (see Note 7)
6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)
Key Diagram is supported in respect of the Brockhill East Strategic Site
7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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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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)
Signature: CM Sackett Date: 11.11.13

Name or Organisat	ion (see Note 8 para 4.1)	

Persimmon Homes South Midlar	nds	
1. To which part of the BORLP4 d	loes this representation relat	e?
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Do you consider the BORLP4 is **unsound** because it is not:

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

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Omission of a Strategic Site at Brockhill West.

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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 separate joint representation with Miller Strategic Land and Southern & Regional Developments. Brockhill West is an entirely appropriate location for residential development which was recently identified as part of Redditch Borough's 5 Year Land Supply despite being within the Green Belt.

Land at Brockhill West should be shown as a Strategic Site for at least 200 dwellings in Redditch Borough as part of a wider cross-boundary allocation.

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	
Yes, I wish to participate at the oral examination	Χ

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)

This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

Signature: <i>CM</i> Sackett	Date: 11, 11, 13

Please use a separate Part B form for each representation you wish to make

4.1)

Persimmon Homes Sout	h Midlands	
1. To which part of the BC	ORLP4 does this representation re	elate?
Page: 25-26	Paragraph:	Policy: 3 Development Strategy and associated paragraphs
Policies Map:	Other document:	
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Do you consider the BORLP4 is **unsound** because it is not:

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

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	ncluding Brockhill East where the first phase is already ructure delivery is recognised and should be planned
to the test you have identified at 6 above. You BORLP4 sound. It will be helpful if you are able	r necessary to make the BORLP4 sound, having regard will need to say why this change will make the e to put forward your suggested revised wording of any e. (Continue on a separate sheet /expand box if necessary) (see
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Signature: <i>CM</i> Sackett	Date: 11, 11, 13

Please use a separate Part B form for each representation you wish to make

Persimmon Homes South Midlan	nds	
1. To which part of the BORLP4 d	oes this representation relate?	
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Policies Map:	Other document:	
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Yes:	No: In part.	

Do you consider the BORLP4 is **unsound** because it is not:

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

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Although support the early delivery of Strategic Sites, these should also include a strategic site at Brockhill West to which a cross-reference should be made in Policy 3

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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 separate joint representation with Miller Strategic Land and Southern & Regional Developments. A strategic site at Brockhill West should also be included.

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	Χ
Yes , I wish to participate at the oral examination	

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

The change sought is consequential to the omission of Brockhill West as a strategic site allocation.

Signature: *CM Sackett* Date: 11.11.13

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Name of Organisation (See Note o para 4.1)	Name or Organisation (see Note 8	para 4.1)	
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Persimmon Homes South Midlan	ids	
1. To which part of the BORLP4 d	oes this representation i	elate?
Page: 26	Paragraph:	Policy: 4 Housing Provision
Policies Map:	Other document:	
	nability Appraisal, pleas	he document, or it relates to a different e make this clear in your response. Note 2)
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The capacity of Redditch Borough is concluded to be some 3,200 dwellings as land at Brockhill West is suitable for residential development within the Borough as evidenced by the land's inclusion for 150 dwellings within the Borough's Five Year Housing Land Supply

statement in 2012 (p27 refers).

Brockhill West is a suitable cross-boundary location for housing growth at a scale of at least 200 dwellings in Redditch Borough and up to 900 dwellings in Bromsgrove District. It provides a suitable alternative overall of approximately 1,100 dwellings to the full extent of the Foxlydiate proposal in Bromsgrove District of 2,800 dwellings where delivery within the Plan period is not realistic and Green Belt impacts preclude the ability to demonstrate exceptional circumstances. There is potential for additional housing development on the western edge of the Brockhill East proposal in Bromsgrove District to include further deliverable land if it is concluded the Foxlydiate proposal west of Redditch, proposed in the Bromsgrove District Plan (BDP), is unsound from either its unsuitability and/or its deliverability at the required scale. The Brockhill (East) Strategic Site in Bromsgrove District in the BDP is assessed by Persimmon as having a capacity of about 700 dwellings.

The objectively assessed need for Redditch is considered to be greater than 6,400 dwellings. Accordingly, the cross-boundary element in Bromsgrove District should be set at a minimum level of 3,200 plus the required increase above 6,400 dwellings to meet the objectively assessed level of need. The basis for this objection rests on the Worcestershire SHMA Monitoring Report 2011/12 dated June 2013 which suggests the range for Redditch is between 6,235 and 9,724 dwellings between 2011 and 2030. In this context, the 6,400 proposed housing requirement is at the lower end of the range and not the middle as indicated in the Plan.

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There is a justification for increasing the Redditch Borough Requirement to <u>at least 3,200</u> dwellings and revisiting the minimum cross boundary requirement in Bromsgrove District to 3,200 dwellings plus the necessary increase overall to meet the correctly assessed objective housing need.

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Yes , I wish to participate at the oral examination	Х

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This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

Signature: <i>CM Sackett</i>	Date: 11.11.13

(4) Positively prepared (see Note 7)

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Name or Organisation	(see Note &	oara 4.1)			
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Persimmon Homes South Midlands			
To which part of the BORLP4 does this representation relate?			
Page: 34	Paragraph: Policy: 8 Green Belt		Policy: 8 Green Belt
Policies Map:	Other document:		· ,
If your representation does not rel document, for example the Sustain 2. Do you consider the BORLP4 is	ate to a specific panability Appraisal, p	lease make this	
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3. Please give details of why you cas possible. If you wish to support set out your comments. (Continue or	consider the BORLI	P4 is not legally ce of the BORL	P4, please also use this box to
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5. Do you consider the BORLP4 is	s sound? (see Note	e 3)	
Yes: X		No:	
Do you consider the BORLP4 is u (1) Justified (see Note 4) (2) Effective (see Note 5) (3) Consistent with national polic		is not:	

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)
The policy is noted and no objection is made. However, exceptional circumstances are concluded to exist to justify the removal of the Brockhill West area from the Green Belt for residential development as proposed in the Revised Preferred Option version of the Plan in 2010.
7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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)
Under other representations it is necessary to remove the Brockhill West area from the Green Belt for residential development and, on a cross-boundary basis, allocate further land for development in Bromsgrove District and also identify safeguarded land areas for potential longer term development needs beyond the Plan period.
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? <i>Please note</i> 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 X Yes, I wish to participate at the oral examination
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)
Signature: CM Sackett Date: 11.11.13

Name or Organisation (see Note 8 para 4.1)		
1. To which part of the DO	DDI D4 do oo thio representation	a valata?
1. To which part of the BC	ORLP4 does this representation	n relate?
Page:	Paragraph:	Policy: 15 Climate Change
Policies Map:	Other document:	
		f the document, or it relates to a different use make this clear in your response.
2. Do you consider the BO	ORLP4 is legally compliant? (se	ee Note 2)
Yes: X	No:	
as possible. If you wish to		is not legally compliant. Please be as precise of the BORLP4, please also use this box to box if necessary)
having regard to the issue make the BORLP4 legally	e(s) you have identified above. compliant. It will be helpful if yolicy or text. Please be as preci	ry to make the BORLP4 legally compliant, You will need to say why this change will you are able to put forward your suggested se as possible. (Continue on a separate sheet
5.0	20104' 107 N . O	
5. Do you consider the Bo	ORLP4 is sound? (see Note 3)	
Yes:	No:	X
Do you consider the BOR	LP4 is unsound because it is	not:
(1) Justified (see Note 4		
(2) Effective (see Note 5		
(3) Consistent with natio		_
(4) Positively prepared (see Note /)	

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Policy 15 (iii) is unnecessary as the issues is adequately addressed in criteria (iv) and (v).

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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)

Policy 15 (iii) should be deleted as the issue is adequately addressed in criteria (iv) and (v) which should be renumbered. This will avoid unnecessary debate over what criterion (iii) is intended to achieve.

The policy objective will be assisted by the proposed development at Brockhill East which is a particularly sustainable location for mixed use development. The introduction of Brockhill West would similarly promote sustainable development in a way which could reduce car dependence.

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	X
Yes, I wish to participate at the oral examination	
9. If you wish to participate at the oral part of the examinate necessary. (Continue on a separate sheet /expand box if necess	
Signature: <i>CM Sackett</i> Date	

Please use a separate Part B form for each representation you wish to make

	Name or Organisation ((see Note 8 para 4.1)	
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Persimmon Homes South Midlands			
1. To which part of the BORLP4 d	oes this representation relate?		
Page: 58-59	Paragraph: penultimate paragraph on page 59	Policy: 20 Requirements for New Development	
Policies Map:	Other document:		
	ate to a specific part of the docume nability Appraisal, please make this slegally compliant? (see Note 2)		
Yes: X	No:		
as possible. If you wish to support	3. Please give details of why you consider the BORLP4 is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)		
4. Please set out what change(s) you consider necessary to make the BORLP4 legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BORLP4 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 BORLP4 is sound? (see Note 3)			
Yes:	No: X		
	·		

Do you consider the BORLP4 is **unsound** because it is not:

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

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)
The experience of RPS and Persimmon Homes is that excessive charges are made which are not commensurate with the costs that could reasonably be incurred at Brockhill East, having regard to previous use of the model for Brockhill East Phase 1 in respect of cumulative assessment.
7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) (see Note 8 para 4.3)
An additional sentence should be added to the penultimate paragraph on page 59 which states that "The Borough Council's expectation is that Worcestershire County Council's charging regime for use of its models will be reasonable".
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? <i>Please note</i> the <i>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.</i>
No, I do not wish to participate at the oral examination X
Yes, I wish to participate at the oral examination
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)

Date: 11, 11, 13

Signature: *CM* Sackett

Name or Organisation (see Note 8 para 4.1)	
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Persimmon Homes South Midlands		
1. To which part of the BORLP4 does this representation relate?		
Page: 69	Paragraph:	Policy: 26 Office Development
Policies Map:	Other document:	
	tainability Appraisal, pleas	the document, or it relates to a different e make this clear in your response.
Yes: X	No:	
	ort the legal compliance of	not legally compliant. Please be as precise the BORLP4, please also use this box to ex if necessary)
having regard to the issue(s) you make the BORLP4 legally com	ou have identified above. Y pliant. It will be helpful if yo r text. Please be as precise	to make the BORLP4 legally compliant, ou will need to say why this change will u are able to put forward your suggested as possible. (Continue on a separate sheet
5. Do you consider the BORLP	4 is sound? (see Note 3)	
Yes: X	No:	
(1) Justified (see Note 4) (2) Effective (see Note 5) (3) Consistent with national portion (4) Positively prepared (see Note 5)	plicy (see Note 6)	ot:

comments. (Continue on a separate sheet /expand box in	BORLP4 is unsound. Please be as precise as possible. RLP4, please also use this box to set out your if necessary)
	ability of the IN67 employment allocation area for office cap on the scale of office uses within the site in either
to the test you have identified at 6 above. You v BORLP4 sound. It will be helpful if you are able	necessary to make the BORLP4 sound, having regard will need to say why this change will make the to put forward your suggested revised wording of any. (Continue on a separate sheet /expand box if necessary) (see
information necessary to support/justify the represent normally be a subsequent opportunity to mare representation at publication stage. After this stage, further submissions inspector, based on the matters and 8. If your representation is seeking a change, depart of the examination? Please note the Inspector.	issues he/she identifies for examination. o you consider it necessary to participate at the oral ector will determine the most appropriate procedure to
	y wish to participate at the oral part of the
examination. No, I do not wish to participate at the oral exam	mination X
No, I do not wish to participate at the oral examination. Yes, I wish to participate at the oral examination. 9. If you wish to participate at the oral part of the	mination X on e examination, please outline why you consider this to
No, I do not wish to participate at the oral examination. Yes, I wish to participate at the oral examination. 9. If you wish to participate at the oral part of the	mination X on e examination, please outline why you consider this to
Yes, I wish to participate at the oral examination	mination X on e examination, please outline why you consider this to

Name or Organisation (see Note	8 para 4.1)	
To which part of the BORLP4 of	does this representation relate?	
1. To which part of the BOTTEL 4 C	does this representation relate:	
Page: 77-78	Paragraph:	Policy: 30 Town Centre and Retail Hierarchy
Policies Map:	Other document:	
	late to a specific part of the docum inability Appraisal, please make the slegally compliant? (see Note 2)	
Yes: X	No:	
as possible. If you wish to suppor	consider the BORLP4 is not legally the legal compliance of the BORI on a separate sheet /expand box if necessal	P4, please also use this box to
having regard to the issue(s) you make the BORLP4 legally compliant.	you consider necessary to make t have identified above. You will ne ant. It will be helpful if you are able ext. Please be as precise as possil para 4.3)	ed to say why this change will to put forward your suggested
5. Do you consider the BORLP4 i	s sound? (see Note 3)	
Yes:	No: X	
Do you consider the BORLP4 is to (1) Justified (see Note 4) (2) Effective (see Note 5) (3) Consistent with national police	No No No No	
(4) Positively prepared (see Not	e 7)	

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible.
If you wish to support the soundness of the BORLP4, please also use this box to set out your
comments. (Continue on a separate sheet /expand box if necessary)

Policy 30 should include the proposed new District Centre at Brockhill East in Tier 2 of the hierarchy for consistency with Policy 46. The supporting text for Policy 30 should include a sentence explaining the addition of the Brockhill East District Centre to the existing list of centres in Tier 2.

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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)

Policy 30 should include the proposed new District Centre at Brockhill East in Tier 2 of the hierarchy for consistency with Policy 46. The supporting text for Policy 30 should include a sentence explaining the addition of the Brockhill East District Centre to the existing list of centres in Tier 2.

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	Χ	
Yes, I wish to participate at the oral examination		

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)

Does not require a hearing.		

Signature: CM Sackett Date: 11, 11, 13

Please use a separate Part B form for each representation you wish to make

	Name or	Organisation	(see Note 8	3 para 4.1)
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Do you consider the BORLP4 is **unsound** because it is not:

(3) Consistent with national policy (see Note 6)

(4) Positively prepared (see Note 7)

(1) Justified (see Note 4) (2) Effective (see Note 5)

Persimmon Homes South Midlar	nds	
1. To which part of the BORLP4 o	does this representation re	late?
Page: 112-117	Paragraph:	Policy: 46 Strategic Sites Brockhill East
Policies Map:	Other document:	
If your representation does not re document, for example the Susta 2. Do you consider the BORLP4 i	inability Appraisal, please	• •
Yes: X	No:	
	t the legal compliance of t	ot legally compliant. Please be as precise ne BORLP4, please also use this box to if necessary)
having regard to the issue(s) you make the BORLP4 legally compliant	have identified above. You ant. It will be helpful if you ext. Please be as precise a	o make the BORLP4 legally compliant, u will need to say why this change will are able to put forward your suggested as possible. (Continue on a separate sheet
5. Do you consider the BORLP4 i	s sound? (see Note 3)	
Yes: In part.	No:	

Signature: CM Sackett	Date: 11, 11, 13			
Persimmon and RPS wish to appear at the Examination in support of the proposal at Brockhill East and if the Local Planning Authority and the Inspector consider there is merit in evidence on deliverability of the site being before the Examination Hearing.				
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)				
No, I do not wish to participate at the oral examinationYes, I wish to participate at the oral examinationX				
8. If your representation is seeking a change, do you part of the examination? <i>Please note</i> the Inspector adopt to hear those who have indicated that they we examination.	r will determine the most appropriate procedure to vish to participate at the oral part of the			
After this stage, further submissions we inspector, based on the matters and iss				
Please note your representation should cover succinformation necessary to support/justify the represent not normally be a subsequent opportunity to make representation at publication stage.	entation and the suggested change(s), as there will			
7. Please set out what change(s) you consider necto the test you have identified at 6 above. You will a BORLP4 sound. It will be helpful if you are able to policy or text. Please be as precise as possible. (Col Note 8 para 4.3)	need to say why this change will make the put forward your suggested revised wording of any			
Persimmon Homes strongly support the principle providing for homes, employment land, recreation and land for a First School. The proposal is support deliverability, where the first phase of development permission has been passed on land east of the robligation.	orted by extensive evidence on suitability and not not is well advanced and a resolution to grant			
6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)				

Please use a separate Part B form for each representation you wish to make

Name or Organisation (see Note 8 para 4.1)

Davidana and Harria and Carotta Middle	l -			
Persimmon Homes South Midlands				
1. To which part of the BORLP4 of	does this represer	ntation relate?		
Page: 112-117	Paragraph:		Policy: 46 Strategic Sites Brockhill East	
Policies Map:	Other document	t:		
If your representation does not re document, for example the Susta 2. Do you consider the BORLP4 i	inability Appraisal	, please make this		
Yes: X		No:		
as possible. If you wish to support the legal compliance of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary) 4. Please set out what change(s) you consider necessary to make the BORLP4 legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BORLP4 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 BORLP4 is sound? (see Note 3)				
Yes:		No: In part		
Do you consider the BORLP4 is unsound because it is not:				
(1) Justified (see Note 4)		Х		
(2) Effective (see Note 5)		X		
(3) Consistent with national police	cy (see Note 6)			
(4) Positively prepared (see Not				
				

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Persimmon Homes has concerns over the detailed wording of parts of the policy and supporting text which require modification to be found sound in respect of effective delivery of the proposal and being the most appropriate spatial planning approach having regard to the alternatives and NPPF advice on sustainable development.

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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)

Significant changes are sought to Criteria (v), (xvi) and (xvii).

Criterion (v) should be amended to recognise that the proposal will provide the land for and contribute towards the delivery of First School accommodation on the site including a contribution towards the provision of community use within the school, potentially in conjunction with the relocation of an existing First School serving this area resourced by Worcestershire County Council.

Criterion (xvi) should be qualified on the basis that if parts of the strategic site come forward as separate phases each element makes a proportionate contribution towards the delivery of the Weights Lane link road as part of a comprehensive delivery strategy. This approach was followed with the Persimmon Homes Phase 1 site.

Criterion (xvii) should be modified to allow for the development to be brought forward on a phased basis through a series of separate planning applications where each proposal assessed both the impact of the proposal and the cumulative impact of the comprehensive development. The latter should include the adjoining land proposed for development in the Bromsgrove District Plan.

Criterion (xiv) should logically also include the Red Ditch as this is one of the principal receiving water courses of water running off from the development.

There is a typographic error in Criterion (vii) which should state 'site's' in line 3. There is no justification for an impact assessment of the proposed Brockhill East District Centre on other District Centres on the basis that the reasoned justification has already concluded in the second paragraph that " an appropriate location should be determined in Brockhill East for a District Centre which is needed in north Redditch, in the Brockhill area". On this basis the need for the District Centre has already been established. District Centres have local convenience shopping at their core. Accordingly the last sentence of the second paragraph of the reasoned justification should be deleted.

The text relating to school provision should refer to the potential for relocation of the existing Holyoakes Fields First School for which a site is sought and a contribution towards additional classrooms and potential community use of the building and recreation elements. This needs amendment to the third paragraph of the reasoned justification as the full provision of the First School is not justified by the Brockhill East development alone. There should also be recognition that the Phase 1 scheme and land east of the railway have and will secure contributions towards the delivery of First School accommodation in the area. Persimmon and RPS remain concerned that the Policy makes reference to a document that has not been subject to scrutiny, i.e. the Green Infrastructure Concept Statement (which has been in preparation for several years yet no draft has ever been published for comment). The principle of providing strategic Green Infrastructure through the comprehensive masterplanning of the area has been accepted by Persimmon from the outset of all development at Brockhill since the late 1980s. The third paragraph on page 116 should appropriately include the Red Ditch as one of the listed water courses.

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	
Yes, I wish to participate at the oral examination	Χ

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)

This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

Signature: <i>CM Sackett</i>	Date: 11.11.13

Please use a separate Part B form for each representation you wish to make

Persimmon Homes South Midlands		
To which part of the BORLP4 does this	representation relate	
Page: 118	Paragraph:	Policy:
Policies Map: Indicative Vision Map for Brockhill East Strategic Site	Other document:	1 . 3.10).
If your representation does not relate to a document, for example the Sustainability		
2. Do you consider the BORLP4 is legally	compliant? (see Note	2)
Yes: X	No:	
3. Please give details of why you consider as possible. If you wish to support the lega set out your comments. (Continue on a separa	al compliance of the B	ORLP4, please also use this box to
4. Please set out what change(s) you conshaving regard to the issue(s) you have ide make the BORLP4 legally compliant. It wil revised wording of any policy or text. Plea /expand box if necessary) (see Note 8 para 4.3	entified above. You wil Il be helpful if you are se be as precise as po	I need to say why this change will able to put forward your suggested
5. Do you consider the BORLP4 is sound? Yes:	? (see Note 3)	
	<u> </u>	
Do you consider the BORLP4 is unsound		
(1) Justified (see Note 4)	X	
(2) Effective (see Note 5)	X	
(3) Consistent with national policy (see Note 7)	lote 6)	
6. Please give details of why you consider	the BORLP4 is unso	und. Please be as precise as possible.

If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Although the Indicative Vision Map is intended to be diagrammatic, as it is based on an Ordnance Survey base it is capable of interpretation differently from the practical development of the site which has been assessed in the evidence base.

Particular concerns relate to the alignment of the 'link road' which suggests a new crossing

point of the railway (whereas the existing under-bridge on Weights Lane is appropriate and available); the green space in the central north of the site is too extensive (far more extensive than site assessments have concluded is necessary or appropriate); a suitable green linear route along the Red Ditch at the south of the site is omitted; secondary road links including those to serve the adjoining land in Bromsgrove District could be appropriately shown; the roundabout sought to act as a potential connection for a future Bordesley Bypass could be shown. A key to explain the annotations could be included to assist interpretation. RPS will adduce a revised Indicative Vision Map which addresses these concerns.

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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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RPS will adduce a revised Indicative Vision Map which addresses these concerns.

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	
Yes, I wish to participate at the oral examination	Χ

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)

This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

Signature: *CM Sackett* Date: 11, 11, 13

Persimmon Homes South Midla	ands		
1. To which part of the BORLP4	does this representation	relate?	
Page:	Paragraph:	Policy:	
Policies Map: Policies Map	Other document:		
	ainability Appraisal, pleas	the document, or it relates to a different se make this clear in your response.	
Yes: X	No:		
as possible. If you wish to suppo set out your comments. (Continue 4. Please set out what change(s) having regard to the issue(s) you make the BORLP4 legally complete.	rt the legal compliance of on a separate sheet /expand book of a separate sheet /expand book of you consider necessary have identified above. You iant. It will be helpful if you text. Please be as precise	s not legally compliant. Please be as precise the BORLP4, please also use this box to ox if necessary) To make the BORLP4 legally compliant, you will need to say why this change will but are able to put forward your suggested e as possible. (Continue on a separate sheet	ie .
5. Do you consider the BORLP4 Yes: Do you consider the BORLP4 is	No: X		
(1) Justified (see Note 4) (2) Effective (see Note 5) (3) Consistent with national poli (4) Positively prepared (see No			

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

The Brockhill East Strategic Site should not contain a Primarily Open Space (POS) designation over land within the site. Part of the POS area is already developed with 14 homes and the 7.3m wide access road off the Hewell Road roundabout. The remainder of the POS in the Red Ditch valley will be formally secured as public access open space through the development of the site in conjunction with infrastructure provision which is expected to include access road construction along its periphery and the construction of attenuation areas for surface water run off. The masterplan led approach to the Strategic Site will ensure a high level of connected green infrastructure but this should not be predetermined on the Policies Map with a potential consequence that Policy 13 on Primarily Open Space may restrict the most appropriate form of development through the masterplanning of the area. The disposition of the housing and POS areas within the Brockhill East Strategic Site on the Policies Plan could mislead the user of the Plan in thinking that the committed community woodland area in the west of the site could be used for housing.

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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 Primarily Open Space designation within the Brockhill East Strategic Site should be removed.

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	Χ

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)

This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

Signature: *CM Sackett* Date: 11.11.13

Please use a separate Part B form for each representation you wish to make

ne or Organisation (see Note 8 para 4.1

Persimmon Homes South Midla	nds		
1. To which part of the BORLP4 of	does this representation	on relate?	
Page:	Paragraph:	Policy:	
Policies Map: Policies Map	Other document:		
	inability Appraisal, ple	of the document, or it relates to a different ease make this clear in your response. See Note 2)	
Yes: X	No	D:	
	t the legal compliance	4 is not legally compliant. Please be as precise of the BORLP4, please also use this box to d box if necessary)	
having regard to the issue(s) you make the BORLP4 legally compli	have identified above ant. It will be helpful if ext. Please be as pred	ary to make the BORLP4 legally compliant, e. You will need to say why this change will f you are able to put forward your suggested cise as possible. (Continue on a separate sheet	
5. Do you consider the BORLP4 i	s sound? (see Note 3	3)	
Yes:	No	o: X	
	1.10		

Do you consider the BORLP4 is **unsound** because it is not:

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

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Persimmon Homes objects to the omission of a Strategic Site at Brockhill West on a cross-boundary basis with adjoining land in Bromsgrove District.

A separate joint objection with Miller Strategic Land and Southern & Regional Developments has been made in this respect.

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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 Proposals Map should show a new Strategic Site at Brockhill West in conjunction with a new site specific policy.

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	Χ

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)

This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

Signature: CM Sackett Date: 11.11.13