



## Borough of Redditch Local Plan No.4 Proposed Submission Document

### Representation Form

**Please return by 5pm on Monday 11<sup>th</sup> 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<sup>th</sup> November 2013** to:

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

Or emailed to: [devplans@redditchbc.gov.uk](mailto: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 Contact details on Part A will not be published.**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.

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

### ***Notification Request:***

Please tick the boxes below if you wish to be notified at any of the following Local Plan stages:

- ☒ that the BORLP4 has been submitted for independent examination
- ☒ the publication of the recommendations of the person appointed to carry out an independent examination of the BORLP4
- ☒ 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.

**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)

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page: Whole Plan	Paragraph:	Policy:
Policies Map:	Other document:	

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

2. Do you consider the 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)

Yes:	No: X
------	-------

Do you consider the BORLP4 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)	
(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)

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

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**)

Introduce paragraph numbering throughout and use colour scheme which allows legible monochrome printing of general text pages for clarity and ease of reference.

**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	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: *C M Sackett*

Date: *11.11.13*

**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)

--

1. To which part of the BORLP4 does this representation relate?

Page: 5	Paragraph: 2 and 3	Policy: Duty to Co-operate
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)

Yes: X	No:
--------	-----

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

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

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**)

**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	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: *C M Sackett*

Date: *11.11.13*

**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)

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page: 20	Paragraph:	Policy: 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 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)

Yes: X	No:
--------	-----

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

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

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)

Identified objectives are appropriate.

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**)

**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	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: *C M Sackett*

Date: *11.11.13*



**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)

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)

Yes: In part	No:
--------------	-----

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

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

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**)

**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	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: *C M Sackett*

Date: *11.11.13*

**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**)

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**)

Yes:	No: In part
------	-------------

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

(1) Justified ( <b>see Note 4</b> )	X
(2) Effective ( <b>see Note 5</b> )	X
(3) Consistent with national policy ( <b>see Note 6</b> )	
(4) Positively prepared ( <b>see Note 7</b> )	

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.

**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)

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

Signature: *C M Sackett*

Date: *11.11.13*

**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)**

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page: 25-26	Paragraph:	Policy: 3 Development Strategy and associated paragraphs
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)**

Yes: In part.	No:
---------------	-----

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

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

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)

Support the early delivery of Strategic Sites including Brockhill East where the first phase is already under construction. The importance of infrastructure delivery is recognised and should be planned on the basis of equitable contributions.

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**)

**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	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: *C M Sackett*

Date: *11.11.13*

**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)**

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page: 25	Paragraph:	Policy: 3 Development Strategy
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)**

Yes:	No: In part.
------	--------------

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

(1) Justified <b>(see Note 4)</b>	X
(2) Effective <b>(see Note 5)</b>	X
(3) Consistent with national policy <b>(see Note 6)</b>	
(4) Positively prepared <b>(see Note 7)</b>	

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.

**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	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)

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

Signature: *CM Sackett*

Date: *11.11.13*



**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)

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page: 26	Paragraph:	Policy: 4 Housing Provision
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)

Yes:	No: X
------	-------

Do you consider the BORLP4 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)	
(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 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.

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**)

**There is a justification for increasing the Redditch Borough Requirement to at least 3,200 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.**

***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)

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

Signature: *C M Sackett*

Date: *11.11.13*

**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**)

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page: 34	Paragraph:	Policy: 8 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 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**)

Yes: X	No:
--------	-----

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

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

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.

**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	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: *C M Sackett*

Date: *11.11.13*

**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)**

--

1. To which part of the BORLP4 does this representation relate?

Page:	Paragraph:	Policy: 15 Climate Change
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)**

Yes:	No: X
------	-------

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

(1) Justified <b>(see Note 4)</b>	X
(2) Effective <b>(see Note 5)</b>	X
(3) Consistent with national policy <b>(see Note 6)</b>	
(4) Positively prepared <b>(see Note 7)</b>	

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.*

**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	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: *C M Sackett*

Date: *11.11.13*

**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**)

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page: 58-59	Paragraph: penultimate paragraph on page 59	Policy: 20 Requirements for New Development
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**)

Yes:

No: X

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

(1) Justified ( <b>see Note 4</b> )	X
(2) Effective ( <b>see Note 5</b> )	
(3) Consistent with national policy ( <b>see Note 6</b> )	
(4) Positively prepared ( <b>see Note 7</b> )	

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.

**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	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*



**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**)

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:	

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**)

Yes: X	No:
--------	-----

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

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

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 26 is supported as recognising the suitability of the IN67 employment allocation area for office uses. It is welcomed that there is no proposed cap on the scale of office uses within the site in either Policy 26 or Policy 46.

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**)

**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	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: *C M Sackett*

Date: *11.11.13*

## 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)

--

1. To which part of the BORLP4 does this representation relate?

Page: 77-78	Paragraph:	Policy: 30 Town Centre and Retail 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 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)

Yes:	No: X
------	-------

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

(1) Justified (see Note 4)	No
(2) Effective (see Note 5)	
(3) Consistent with national policy (see Note 6)	No
(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)

**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.*

***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	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)

Does not require a hearing.

Signature: *C M Sackett*

Date: *11.11.13*

**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)**

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page: 112-117	Paragraph:	Policy: 46 Strategic Sites Brockhill East
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)**

Yes: In part.	No:
---------------	-----

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

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

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 strongly support the principle of the selection of Brockhill East as a strategic site providing for homes, employment land, recreational areas and facilities and a new District Centre and land for a First School. The proposal is supported by extensive evidence on suitability and deliverability, where the first phase of development is well advanced and a resolution to grant permission has been passed on land east of the railway subject to completion of a S106 Planning Obligation.

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**)

**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)

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.

Signature: *C M Sackett*

Date: *11.11.13*

## 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)

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page: 112-117	Paragraph:	Policy: 46 Strategic Sites Brockhill East
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)

Yes:	No: In part
------	-------------

Do you consider the BORLP4 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)	
(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 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.

**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)

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

Signature: *C M Sackett*

Date: *11.11.13*



**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)

Persimmon Homes South Midlands

1. 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:	

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)

Yes:

No: X

Do you consider the BORLP4 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)	
(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 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**)

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 has adduced a revised Indicative Vision Map which addresses these concerns.

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.*

**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)

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

Signature: *C M Sackett*

Date: *11.11.13*

**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**)

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page:	Paragraph:	Policy:
Policies Map: <b>Policies Map</b>	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**)

Yes:	No: X
------	-------

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

(1) Justified ( <b>see Note 4</b> )	X
(2) Effective ( <b>see Note 5</b> )	X
(3) Consistent with national policy ( <b>see Note 6</b> )	
(4) Positively prepared ( <b>see Note 7</b> )	

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	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)

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

Signature: *C M Sackett*

Date: *11.11.13*

**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**)

Persimmon Homes South Midlands

1. To which part of the BORLP4 does this representation relate?

Page:	Paragraph:	Policy:
Policies Map: 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**)

Yes:	No: X
------	-------

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

(1) Justified ( <b>see Note 4</b> )	X
(2) Effective ( <b>see Note 5</b> )	
(3) Consistent with national policy ( <b>see Note 6</b> )	
(4) Positively prepared ( <b>see Note 7</b> )	

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	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)

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

Signature: *CM Sackett*

Date: *11.11.13*