



## 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 Contact details on Part A will not be published.**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>Miller Strategic Land, Persimmon Homes South Midlands and Southern &amp; Regional Developments</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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BORLP4 does this representation relate?

Page: <b>Whole Plan</b>	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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes:	No: X
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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)	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 page numbering and poor choice of colour scheme that means the plan must be printed in colour 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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes: X	No:
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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)

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.*

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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	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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BORLP4 does this representation relate?

Page: 20	Paragraph:	Policy: <b>Objectives</b>
Policies Map:	Other document:	

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

2. Do you consider the BORLP4 is legally compliant? (see Note 2)

Yes: X	No:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes: X	No:
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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)

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.*

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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 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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BORLP4 does this representation relate?

Page: 21	Paragraph:	Policy: <b>Key Diagram</b>
Policies Map:	Other document:	

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

2. Do you consider the BORLP4 is legally compliant? (see Note 2)

Yes: X	No:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes:	No: X
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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)

**Omission of a Strategic Site at Brockhill West.**

**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.**

**This objection to the omission of Brockhill West as a strategic site is also the subject of separate statement relating to both the BRLP4 and Bromsgrove District Plan (BDP).**

**The proposed level of housing provision for Redditch overall is considered inadequate and there are also compelling objections to the full extent of the Foxlydiate urban extension proposal in the BDP in respect of both suitability and delivery in the Plan period.**

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**)

**Brockhill West should be introduced as a strategic site in the BRLP4 and on a cross-boundary basis with adjoining land in Bromsgrove District as proposed in principle in the Revised Preferred Redditch Plan in 2011.**

*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	
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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BORLP4 does this representation relate?

Page: 25-26	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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes: In part	No:
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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)

The early delivery of Strategic Sites is supported 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**)

N/A

***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	
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Yes, I wish to participate at the oral examination	
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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: *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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes:	No: In part
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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 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**)

**Inclusion of a cross-reference to a new strategic site at Brockhill West.**

***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	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: *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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands:  
Brockhill West

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:
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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes:	No: X
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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.

It is noted that under the current Plan strategy of providing at least 6,400 homes at Redditch, there is no prospect of delivering the number of required affordable homes in the area. Consideration should therefore be given to whether a higher overall requirement would be 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**)

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.

This reflects the additional capacity at Brockhill West and conforms with the NPPF objective of seeking significantly to boost the supply of housing. It is noted the reference in the Bromsgrove Plan is for a minimum level of provision in the District to meet the needs of Redditch and a consistent approach is merited.

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

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

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

Signature: *E 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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BORLP4 does this representation relate?

Page: 30	Paragraph:	Policy: 6 Affordable Housing
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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes:	No: X
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Do you consider the BORLP4 is **unsound** because it is not:

(1) Justified (see Note 4)	X
(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 evidence that 30% of qualifying housing developments as affordable housing will be viable is not robust and does not take account of potential significant development costs which arise from other Local Plan policies for example Policy 4 (Worcestershire Extra Care Housing Strategy, Policy 11 Green Infrastructure Concept Statements on Strategic Sites, Policy 12 Open Space Provision SPD, Policy 15 Climate Change, Policy 18 Strategic Urban Drainage systems, Policy 19 sustainable transport, Policy 20 Accessibility standards, Policy 39 Green Infrastructure and Policy 40 Design (especially criteria (vi) and (viii).

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 6 should be amended to a lower affordable housing requirement to reflect the conclusions of a revised viability appraisal which takes account of additional development costs.

**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	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)

This merits oral examination but can be considered centrally through the Home Builders Federation.

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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes: X	No:
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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)

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 January 2011. At that stage the land was proposed for 150 dwellings and 2.5ha of employment. If fully developed for housing the available land can deliver between 200 and 250 dwellings in the plan period.  
The land is recognised as developable on page 228 of the Housing Growth Development Study January 2013.

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**)

No change is sought under this representation.  
However, under separate representations, the objectors are seeking the removal of Brockhill West from the Green Belt for residential development with safeguarded land up to the boundary shown on the Plan at Appendix 3 in the attached report.

**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	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)

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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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BORLP4 does this representation relate?

Page: 39	Paragraph:	Policy: 11 Green Infrastructure
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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes:	No: X
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Do you consider the BORLP4 is **unsound** because it is not:

(1) Justified (see Note 4)	X
(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)

**Miller Strategic Land, Southern & Regional Developments and Persimmon Homes note the intention of the Council to produce Green Infrastructure Concept Statements for Strategic Sites. It is a concern that these will not be the subject of scrutiny yet are intended to have the status of development plan policy through the Strategic Site Policies. This would apply to Brockhill West were the site to be included in the BRLP4.**

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**)

Green Infrastructure Concept Statements for Strategic Sites should only be introduced if they are subject to scrutiny prior to adoption.  
References should only be made to the GICs in the supporting text as guidelines.

**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 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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BORLP4 does this representation relate?

Page: 45	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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes:	No: X
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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)

Policy 15 (iii) is unnecessary as the issue 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 would be assisted by the proposed development at Brockhill West which is a particularly sustainable location for residential led development. The introduction of Brockhill West would promote sustainable development in a way which could reduce car dependence given its high level of accessibility and potential for integration with the Redditch Urban Area including public transport.**

*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 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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes:	No: No
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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)	
(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 supporting text should refer to the proposed delivery of a Brockhill West District Centre associated with an additional Strategic Site, recognising that the District Centre would be located within adjoining land in Bromsgrove District as part of a cross-boundary proposal.

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 supporting text should include a sentence referring to the proposed delivery of a Brockhill West District Centre in the adjoining Bromsgrove District area as part of a mixed use cross-boundary allocation in that location.**

***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	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)

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Signature: <i>C M Sackett</i>	Date: <i>11.11.13</i>
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**Part B (see Note 1 and Note 8 para 4.2)**

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

Name or Organisation (see Note 8 para 4.1)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
---

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)

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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
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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)

**Miller Strategic Land, Southern & Regional Developments and Persimmon Homes object to the omission of a Strategic Site at Brockhill West on a cross-boundary basis with adjoining land in Bromsgrove District.**

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**)

**Inclusion of Strategic Site at Brockhill West.  
See separate 'omission' objection.**

***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	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)

Miller Strategic Land, Southern & Regional Developments and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BORLP4 does this representation relate?

Page: <b>Omission</b>	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:
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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)

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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)

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes:	No: X
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Do you consider the BORLP4 is **unsound** because it is not:

(1) Justified (see Note 4)	X
(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)

**Miller Strategic Land, Southern & Regional Developments and Persimmon Homes object to the omission of a Strategic Site at Brockhill West on a cross-boundary basis with adjoining land in Bromsgrove District. A separate document has been submitted with this representation addressing the comparative suitability, availability and achievability of the Brockhill West site with the full extent of the Foxlydiate proposal in the Bromsgrove District Plan.**  
**The inclusion of this readily deliverable site will add to the immediate 5 year housing land supply and assist in addressing the current position in respect of shortfall in provision.**

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 inclusion of a Strategic Site at Brockhill West.**  
**See separate document.**

*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	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*