



**Bromsgrove**  
**District Council**  
[www.bromsgrove.gov.uk](http://www.bromsgrove.gov.uk)

## **Bromsgrove District Council Proposed Submission Document**

### **Representation Form**

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

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

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**. Representation forms are available on the Council's website [www.bromsgrove.gov.uk/bdp](http://www.bromsgrove.gov.uk/bdp) and can be submitted via the following.

- **By Email:** [strategicplanning@bromsgrove.gov.uk](mailto:strategicplanning@bromsgrove.gov.uk)
- **By Fax:** 01527 881313
- **By Post:** Strategic Planning  
Planning and Regeneration  
Bromsgrove District Council  
Burcot Lane  
Bromsgrove  
Worcs. B60 1AA
- **In Person:** The Council House or Customer Service Centre (Dolphin Centre)

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, Southern &amp; Regional Developments and 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 Plan stages:

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

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 Strategic Planning matters and procedures following the adoption of BDP. 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 and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BDP 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 BDP is legally compliant? (see Note 2)

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

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

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

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

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

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

The use of paragraph numbering throughout is commended.

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

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

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

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

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

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

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 and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BDP does this representation relate?

Page: 4	Paragraph: 1.13-1.16 Duty to Co-operate	Policy:
Policies Map:	Other document:	

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

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

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

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

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

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

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

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

**There should be a commitment to review the Plan to deal with Birmingham related development if required. The approach should be similar to that proposed for Redditch Borough and recognise that the cross-boundary implications for Redditch to meet Birmingham's unmet needs within the wider GBSLEP area is likely to have local cross-boundary implications for Bromsgrove District as well as the direct relationship between Birmingham and Bromsgrove District.**

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

**Paragraph 1.15 should be more explicit about the outcome of the cross-boundary joint working between Bromsgrove and Redditch Councils in respect of the need for strategic site allocations to meet Redditch-related development needs in Bromsgrove District on the edge of the Redditch urban area.**

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

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

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

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

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 and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BDP does this representation relate?

Page: 11	Paragraph: 3 Key Challenges	Policy:
Policies Map:	Other document:	

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

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

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

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

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

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

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

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

There is a need for the key challenges to refer to meeting cross-boundary needs relating to Redditch in the plan period and beyond.

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

There is a need for the key challenges to refer to meeting cross-boundary needs relating to Redditch in the plan period and beyond.

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

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

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

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

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

This does not require oral evidence.

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 and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BDP does this representation relate?

Page: 12-13	Paragraph: 4 Vision	Policy:
Policies Map:	Other document:	

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

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

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

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

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

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

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

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

The Vision should also recognise the need to work collaboratively with Redditch Borough Council to ensure the development needs of this neighbouring authority are addressed sustainably.

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

The Vision should also recognise the need to work collaboratively with Redditch Borough Council to ensure the development needs of this neighbouring authority are addressed sustainably.

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

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

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

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

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

This does not require oral evidence.

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 and Persimmon Homes South Midlands: Brockhill West

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

Page: 15	Paragraph: 7 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 BDP is legally compliant? (see Note 2)

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

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

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

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

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

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

**1. The Key Diagram should address the issue of strategic Areas of Development Restraint for potential developments beyond the Plan Period as required by NPPF paragraphs 83 to 85. Land west of the Brockhill East Strategic Site bounded by Weights Lane and Butlers Hill Wood to the north and Cladshill Wood to the west is considered suitable as an ADR to address potential further development needs related to Redditch, recognising that the principle of Redditch's needs being met on a cross-boundary basis has been accepted through the Proposed Submission Version of the Bromsgrove District Plan.**

**2. The identified area of the Brockhill East Strategic Site within Bromsgrove District has a capacity of about 700dw taking account of the assessed constraints. This justifies amending the indicated site capacity from 600 to 700 dwellings. In the event of**

the need to compensate for undeliverable housing capacity at Foxlydiate in the Plan period to 2030, having regard also to the suitability of allocating land at Brockhill West for development, consideration should be given to extending the western boundary of the allocated Brockhill East strategic site to include additional land. There a clear and defensible boundary adjacent to the fishing ponds which is a suitable alternative to ensure the delivery of at additional dwellings in this location. In this scenario, the extent of the ADR land referred to at (1) above can be adjusted to be contiguous with the boundary of the allocated site.

3. Miller Strategic Land, Southern & Regional Developments and Persimmon Homes object to the omission of a Strategic Site at Brockhill West (see separate joint representation with Miller Strategic Land and Southern & Regional Developments) for up to some 1,100 dwellings including about 900 dwellings in Bromsgrove District. Brockhill West is an entirely appropriate location for cross-boundary residential development. The part in Redditch Borough was recently identified as part of the Borough's 5 Year Land Supply despite being within the Green Belt. The Brockhill West land is a suitable and deliverable alternative to the inappropriate extent of the Foxlydiate Strategic Site proposal of 2,800 dwellings which is concluded to conflict with Green Belt policy in the NPPF and is concluded not to be capable of full delivery by 2030. The evidence presented on heritage grounds for excluding land at Brockhill West has been rebutted in previous submissions and is concluded to be an unsound basis for rejecting an otherwise most appropriate option in terms of sustainability appraisal. In terms of housing trajectory delivery, land at Brockhill West in Bromsgrove District is capable of early release in parallel with on-going development at Brockhill East in Redditch Borough, where the Bromsgrove part of the strategic site is expected to follow later in the plan period.

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

Brockhill West should be added as a strategic site; an ADR should be shown at Brockhill north of Brockhill West and west of the 'Brockhill' Strategic Site (Site 2); and the Foxlydiate Strategic Site should be reduced in extent so it does not extend south of Cur Lane and the western boundary is as shown on the plan at Appendix 3 in the separate report accompanying duly made representations on behalf of Miller, SRD and Persimmon.

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

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

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

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

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

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 and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BDP does this representation relate?

Page: 19	Paragraph:	Policy: BDP2 Settlement Hierarchy
Policies Map:	Other document:	

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

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

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

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

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

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

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

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

**The policy fails to refer to meeting Redditch related housing needs on a cross-boundary basis in the first list of locations from BDP2.1- 2.4. There should be a cross-reference to Policy RCB1.1 Redditch Cross Boundary Development.**

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

**There should be a cross-reference to Policy RCB1.1 Redditch Cross Boundary Development.**

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

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

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

This does not require oral evidence as it relates to appropriate cross-referencing and internal consistency.

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 and Persimmon Homes South Midlands: Brockhill West

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

Page:21-22	Paragraph: 8.18-8.24	Policy: BDP3 Future Housing and Employment Growth
Policies Map:	Other document:	

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

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

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

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

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

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

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

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

**The Plan states clearly that the objectively assessed need to meet Bromsgrove District's housing requirement is just below 7,000 dwellings in the plan period between 2011 and 2030. This excludes cross-boundary provision at Redditch. The Plan however has failed to demonstrate how the full objectively assessed needs will be delivered through identified sources of supply, such that there will be a shortfall of some 2,400 dwellings which will be dependent upon a future review of the Plan in turn dependent on a Green Belt review exercise. This is concluded to be at odds with the NPPF which requires at paragraph 47 bullet**

1 that sites which are critical to the delivery of the housing strategy (i.e. to deliver 7,000 homes by 2030) are identified in the Plan. It is considered unsound to defer decisions on some 34% of the required housing delivery in a Plan period to a review of the plan. In separate representations, Persimmon Homes with Miller Strategic Land and Southern Regional Developments identify the comparative merits of land at Brockhill West contributing up to some 900 dwellings on the edge of Redditch within Bromsgrove District, contributing towards the identified overall requirement for Redditch Borough. The principle of addressing Birmingham related growth through a plan review is accepted as the evidence base for Bromsgrove's potential share of unmet future need in Birmingham has not yet been identified and the approach can be same for Bromsgrove as other 'shire districts' around Birmingham (for example Lichfield in the same GBSLEP area) where Local Plan Examination inspectors have accepted that an early review will be appropriate.

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

**The comparative merits of land at Brockhill West contributing up to some 900 dwellings on the edge of Redditch within Bromsgrove District, contributing towards the identified overall requirement for Redditch Borough should be identified. Brockhill West should be a Strategic Site in the plan.**

**A new policy allocating the site is required.**

***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.

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

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

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

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 and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BDP does this representation relate?

Page: 22	Paragraph: 8.25	Policy: BDP3
Policies Map:	Other document:	

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

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

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

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

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

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

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

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

**Miller, SRD and Persimmon support the recognition of the need for collaborative joint cross-boundary working between Redditch Borough and Bromsgrove District Councils to address the needs of Redditch Borough as identified in paragraph 8.25 and the right column of the table in Policy BDP3.**

**Land at Brockhill East can contribute effectively some 700 dwellings towards the delivery of required homes in Bromsgrove District on the edge of Redditch.**

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

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

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

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

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

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 and Persimmon Homes South Midlands: Brockhill West

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

Page: 23-25	Paragraph:	Policy: BDP4 Green Belt
Policies Map:	Other document:	

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

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

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

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

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

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

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

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

**The Bromsgrove District Plan should not be dependent upon a future Green Belt Review to deliver the District's housing requirement. It is noted that a Green Belt review has been undertaken for peripheral growth at Redditch to meet fully identified needs in the period to 2030 which is commended. However, under NPPF paragraphs 83 to 85 regard must be given to future potential development needs such that boundaries do not need to be reviewed again at the end of the plan period. It is noted that the District Council intends to identify safeguarded land (or Areas of Development Restraint (ADRs)) for Bromsgrove District's needs as part of the Green Belt Review process. It is illogical and inconsistent that the review already undertaken at Redditch has not addressed the need for ADR designation. The reasons given for the omission of ADRs at Redditch in paragraph 8.32 are not a credible justification for concluding there will be no need to review Green Belt boundaries for**

development beyond 2030 on the periphery of Redditch. Redditch Town Centre regeneration cannot be expected to deliver extensive new housing areas and the redevelopment of areas of the New Town are not expected to result in significantly higher densities and may result in lower density development in the future requiring further peripheral expansion. In the event that the deferral of the Green Belt Review is found sound, contrary to RPS's views, the scope of the review should include consideration of safeguarded land/ADRs on the edge of Redditch.

The District Council will be aware that a Green Belt Review exercise has been undertaken by RPS and FPCR on the periphery of Redditch which was reported in December 2009. This was supplied to both Redditch Borough and Bromsgrove District Councils and is contended to be a robust assessment of areas against the former PPG2 and now NPPF Green Belt purposes and in accordance with policy on boundary definition.

It is noted that consultation feedback is recorded at paragraph 8.37 in terms that "the Council should do the Green Belt review now to ensure sufficient land is available for new development". The counter view that Green Belt should be protected is not a valid reason for not undertaking the review as the objective needs evidence only allows the conclusion that allocation of land for development within the Green Belt is required. No reason is given for not undertaking the review prior to the publication of the Proposed Submission Version of the Plan.

The safeguarding of land also should take account of the potential outcome of the current exercise of assessing Birmingham related needs where Redditch as a former New Town has many attributes which make it an appropriate location for addressing part of the unmet need in Birmingham, albeit in the context of cross-boundary growth into Bromsgrove District.

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

**Green Belt review across the wider District must be undertaken sooner in order to fully identify the housing need to 2030.**

**At Redditch the Green Belt review has failed to identify safeguarded land in accordance with NPPF. Land at Brockhill West should be removed from the Green Belt for a strategic allocation and land north of Brockhill West and west of Brockhill (East) should be safeguarded for potential longer term development needs beyond 2030.**

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

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

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

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

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

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Signature: *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 and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BDP does this representation relate?

Page: 43-46	Paragraph:	Policy: RCBD1 Redditch Cross Boundary 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 BDP is legally compliant? (see Note 2)

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

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

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

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

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

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

The principle of meeting cross boundary development on the periphery of Redditch to meet Redditch-related needs is strongly supported. It is agreed that exceptional circumstances exist to review the Green Belt boundary for this scale of development and also for safeguarding further land. However, as explained in a separate objection the exceptional circumstances are not considered to exist in respect of the full extent of the Foxlydiate proposal.

As presented in a separate representation, Miller, SRD and Persimmon do not fully agree with the selected sites to meet the cross-boundary growth needs and challenges the robustness of the evidence base in this context.

The use of 'Brockhill' rather than 'Brockhill East' is inappropriate as there is scope for potential confusion. The adjoining land in Redditch Borough forming the Strategic Site allocation in the Borough of Redditch Local Plan No.4 refers to the site as 'Brockhill East'.

Separate representations seek the addition of a new cross-boundary Strategic Site at 'Brockhill West'.

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

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

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

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

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 and Persimmon Homes South Midlands: Brockhill West

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

Page: 43-46	Paragraph:	Policy: RCBD1 Redditch Cross Boundary 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 BDP is legally compliant? (see Note 2)

Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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5. Do you consider the BDP is sound? (see Note 3)

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

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

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

**Objection is made to the omission of a strategic allocation at Brockhill West for some 900 dwellings in Policy RCBD1 as a suitable and deliverable alternative to the southern (south of Cur Lane) and north-western elements of the Foxlydiate Site 1 proposal.**  
**The Foxlydiate site should be reduced to approximately 1,600 dwellings. The 1,200 dwellings reduction from 2,800 can be accommodated appropriately through Brockhill West on a cross-boundary basis of some 1,100 dwellings (including at least some 200 dw in Redditch Borough) together with the increased actual capacity of the Brockhill (East) strategic site in Bromsgrove of about 700 dwellings (rather than the 600 identified in the BDP).**  
**There is also potential for further dwellings on the western boundary of the Brockhill (East)**

strategic site for additional provision to meet a higher strategic requirement. The scale of proposed cross-boundary development at some 3,400 dwellings is noted. However, it is considered that the objectively assessed needs for Redditch are higher than 6,400 homes for reasons that the updated Worcestershire SHMA concluded the range for Redditch was between 6,235 and 9,724 dwellings. RPS does not accept that selecting a figure close to the bottom of the range accords with national policy ambitions to boost significantly the supply of housing. The provision of some 200 to 250 dwellings at Brockhill West in Redditch Borough will reduce the strategic requirement as currently proposed on a cross-boundary basis in Bromsgrove District. However, the increase in overall requirement above the 6,400 currently proposed overall requirement will need to be accommodated in cross-boundary locations in Bromsgrove District.

The Brockhill West land in Redditch Borough formed part of the Borough Council's five year land supply to the extent of 150 dwellings in 2012 in conjunction then with an expectation part of the site would be used for employment.

The full case for the objection is set out in a separate joint statement report on behalf of Persimmon Homes, Miller Strategic Land and Southern & Regional Developments.

The objection to Foxlydiate centres on unsuitability and lack of deliverability.

RCBD1.9(I): Affordable housing needs in Redditch Borough and viability assessment have justified a target of 30%. A consistent approach should be followed between the cross-boundary elements at Redditch. There should be a consequential change to Policy BDP8 accordingly for Redditch related development.

RCBD1.9(II): This criterion should allow for phased applications and Transport Assessments being produced, albeit recognising that the cumulative impacts will need to be assessed as part of the process. The principle should be that each phased scheme should make a fair and equitable contribution towards required transport and other infrastructure (as applied to the Phase 1 Brockhill East application in Redditch Borough).

RCBD1.9(III): The expectation at Criterion (III) that all dwellings will be located within 250m of a bus stop is noted.

It is noted that the summary of consultation does not identify where community preference was expressed for Redditch related growth.

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

Land at Brockhill West should be allocated as a Strategic Site and 'Brockhill' be renamed 'Brockhill East'

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

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

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

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 and Persimmon Homes South Midlands: Brockhill West
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1. To which part of the BDP does this representation relate?

Page: 96-100	Paragraph:	Policy: BDP20 Managing the Historic Environment
Policies Map:	Other document:	

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

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

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

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

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

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

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

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

**Part BDP20.3 is not consistent with NPPF policy on built environment. Other parts of the Policy adequately address heritage issues and the need to conserve heritage in accordance with the NPPF.**

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

Part BDP20.3 should be deleted.

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

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

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

Signature: *CM Sackett*

Date: *11.11.13*