e 095

[redacted]

Sent: 11 November 2013 15:50
To: BDC strategic planning
Cc: Clare Lucey/GBR/DTZ
Subject: Bromsgrove District Council Proposed Submission Document - Representations on behalf of Phoenix Life Ltd
Attachments: PLL Part A form.pdf; PLL 2 3.pdf; PLL 8 69.pdf; PLL BDP3.pdf; PLL BDP5B.pdf; PLL policies map.pdf; PLL representations.pdf

Dear sir/madam,

Please find attached representations to the Bromsgrove District Council Proposed Submission Document on behalf of Phoenix Life Limited.

In accordance with the instruction I attach a completed copy of Part A together with completed Part B forms for each part of the Plan which my client is seeking amendments to satisfy their objection.

Each completed part B form refers to a supporting document, which is also attached 'PLL representations'. This sets out the comprehensive objection of my client and provides a clear explanation of each amendments sought.

I'd be very grateful if you could confirm receipt of the objection and that the objections have been duly made.

Kind Regards

[redacted]

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Do you consider the BDP 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 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)

Please see supporting document

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 Policies Map should be amended to reflect the objection.

Please see supporting document (section 6)

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

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

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

No, I do not wish to participate at the oral examination	☐
Yes, I wish to participate at the oral examination	✓

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)

Please see supporting document

Signature: [redacted]	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)**

Phoenix Life Ltd

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

Page:	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:☐	No:☐

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

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)**

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

Yes:☐	No:✓

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

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

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Please see supporting document

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Policy should be amended to include the objection site.

Please see supporting document (section 6)

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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Please see supporting document

Signature: [redacted]	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)**

Phoenix Life Ltd

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

Page: 34	Paragraph:	Policy: BDP5B
Policies Map:	Other document:	

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

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

Yes:☐	No:☐

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

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

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Please see supporting document

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Policy BDP should be amended.

Please see supporting document (section 6)

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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Please see supporting document

Signature: [redacted]	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)**

Phoenix Life Ltd

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

Page: 22	Paragraph:	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:☐	No:☐

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

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

Yes:☐	No:✓

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)**

Phoenix Life Ltd

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

Page: 33	Paragraph: 8.69	Policy:
Policies Map:	Other document:	

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

Yes:☐	No:✓

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

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

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Please see supporting document

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Policy BDP2 (2.3) should be amended

Please see supporting document (section 6)

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Yes, I wish to participate at the oral examination	✓

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Please see supporting document

Signature: [redacted]	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)**

Phoenix Life Ltd

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

Page: 19	Paragraph:	Policy: 2.3
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.

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

Yes:☐	No:✓

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DTZ
a UGL company

Bromsgrove Local Plan
Representations on behalf of

Phoenix Life Limited

November 2013

DTZ, a UGL company
1 Colmore Row
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Job No/Ref: 130KDR00

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Appendices

1	Site Plan

1 Introduction

The Site

1.1 The site that is the subject of this objection forms part of the Wythall Green Business Park (formerly known as Britannic Business Park), located off Middle Lane, Wythall. The Business Park is situated approximately 3 km south of the Maypole roundabout and Birmingham urban boundary, and 2.5 km north of Junction 3 of the M42/A435.

1.2 The Business Park is bounded by Middle Lane to the east, Birmingham Museum of Transport and St Mary's Caravan Park and Caravan Club site to the south, and open farm land to the north and west. There is public footpath along the western boundary of the site.

1.3 Wythall Green Business Park covers a total area of 11.8 ha. The northern part of the Business Park has been developed for modern high quality headquarters office space and is owned by the objector. To the south east of the Business Park is a separate office building (Boundary House) with road frontage onto Middle Lane which is fully occupied. There is a substantial landscaped open space centrally located within the Business Park.

1.4 The southern part of the site is the "objection site". It extends to approximately 3.8 ha and is accessed from an internal road within the business park. A plan identifying the subject site and its access is attached at appendix 1.

Adopted and proposed development plan allocation

1.5 The adopted Local Plan identifies the Wythall Green Business Park site as an existing employment site under Policy E6. The adopted Local Plan states that the District Council will seek to prevent an incursion of residential and other incompatible land uses into areas predominantly devoted to commercial/employment activities. In considering proposals for other development, account will be taken of the availability of land for employment uses, and of the compatibility of the proposed use with the use of adjacent land for employment purposes:

> *"In areas where employment uses predominate, the district council will not allow residential or other land uses in locations where they could be adversely affected by noise, smell, or traffic or for reasons of health or safety. The availability of employment land will also be a factor taken into account'* (policy E6).

1.6 The Wythall Business Park site remains an identified employment site within the Bromsgrove District Plan Proposed Submission Version on the Key Diagram. Policy BDP3 identifies an employment land requirement of 28 hectares over the plan period. Policy BDP14 relates to designated employment land and safeguards existing employment areas subject to applicants demonstrating the following:

I. The proposal would not have an adverse impact upon the quality and quantity of employment land within the local area; and

II. There would be a net improvement in amenity (e.g. redevelopment of 'non conforming' uses close to residential areas); and

III. The site has been actively marketed for employment uses for a minimum period of 12 months for which full and detailed evidence must be provided or where an informed assessment has been made as to the sustainability of the site/ premises to contribute to the employment land portfolio within the District; or

IV. *The new use would result in a significant improvement to the environment, to access and highway arrangements, or sustainable travel patterns which outweighs the loss of employment land; and*

V. *The site/premises are not viable for an employment use or mixed use that includes an appropriate level of employment.*

1.7 The objection site has been evaluated against the above criteria. It is concluded that the continuing allocation of the entire Wythall Green Business Park is not justified having regard to policy contained with the National Planning Policy Framework and renders the draft BDP unsound.

Site Planning History

1.8 The Wythall Business Park Site has an extensive planning history, relating to its former use as a car depot for Autocar and then Lada/Proton and then the development of Wythall Green Business Park (formerly Britannic Business Park).

1.9 The Outline Planning Permission for Wythall Green Business Park was granted in November 1991 (ref. B19091) to provide 65,031 sq m of B1 office business space across a site extending to a total of 17 ha. Reserved Matters Approval was granted for road layout and landscaping (ref. B/1993/0089) and Reserved Matters Approval was granted for landscaping, surface water drainage and engineering works (ref. B/1993/0292) in April 1998 and May 1993 respectively. In November 1993 Reserved Matters Approval was granted for the development of 23,495 sq m of the permitted 65,031 sq m B1 office space (ref. B/1993/0649). This part of the development has been implemented and comprises the existing Wythall Business Park.

1.10 Two detailed planning permission were granted for the provision of sports facilities on the site - sports pavilion, crèche and computer suite (ref. B/1995/0224), and tennis court and service track (ref. B/1996/0510).

1.11 The site owner has sought to maintain an extant Outline Planning Permission for the remaining undeveloped land (including the objection site) in order to ensure the site remains as attractive as possible to the market. The extant Outline Planning Permission is for up to 22,495 sq m of B1 office accommodation within the Wythall Green Business Park site (ref. B/1998/0987). The Outline Planning permission has been renewed a number of times:

- B/1998/0987 approved 16 May 2000
- Renewal of outline consent B/1998/0987 (ref. B/2003/0229, approved 11 December 2003)
- Renewal of outline consent B/2003/0229 (ref. B/2006/0146, approved 5 April 2006)
- Renewal of outline consent B/2006/0146 with all matters reserved apart from access (ref./2009/0136, approved 22 May 2009).
- An extension of time for implementation of this application was approved subject to a revised S106 agreement in August 2012.

1.12 No development has taken place at the Wythall Green Business Park site since 1996 and despite site marketing there has been no commercial development interest in the objection site.

Purpose of representations

1.13 Phoenix Life Limited (and its predecessor companies) has owned the Wythall Green site for over 20 years. Having developed the site as its own headquarters (then Britannic Assurance headquarters) the owners have sought to deliver the development of the remaining land on the Business Park. It is evident that a solely

commercial development on the remaining site is not attractive to the market and is not viable as evidenced by a development gap of almost two decades. Therefore, the best use of the land is not being maximised and an alternative approach to achieving sustainable development and the best use of previously developed land is required.

1.14 These representations propose the objection site, which forms only part of the remaining undeveloped land, should be allocated for residential development. The rest of the site would remain an employment allocation. It would introduce an appropriate and sustainable mix of uses within the business park site. It is considered this is the most appropriate approach to maximising the use of previously developed land and delivering residential and commercial development in a sustainable location.

1.15 The objection site will provide sufficient land to attract national house builder interest and genuinely be deliverable. It is also detached from the existing commercial uses by an internal road and substantial landscaping. It also adjoins land to the south which includes residential development.

Subject site Assessment

Criteria	Comment
Location	The site is previously developed land in a sustainable location adjoining commercial, residential and leisure uses.
Green Belt	The site is not within the Green Belt and development of the proposed use would not impact on the openness of the Green Belt.
Accessibility	The site has excellent accessibility to the highway network. It is located 2.4km from Wythall Railway Station. Bus stop within 500 metres of the site.
Sustainability	The mix of uses would be both complementary and sustainable and would ensure the re-use of previously developed land.
Topography	The site is broadly level and capable of accommodating residential development
Viability	Residential development on the site is viable
Phasing	Residential development is likely to take place in a single phase owning to size and layout.
Conformity with Strategic Policy	Housing development will assist in meeting the strategic housing requirements for the District and would not impact on the delivery of the District's employment development requirements.
Rights of Way	A right of way runs adjacent to the site and will not be affected by the development
Infrastructure Capacity (highways)	There is sufficient capacity on the highway network to accommodate the proposed development. This would be tested in detail through a planning application
Infrastructure capacity (services)	There are nearby schools, shops and services 1.1km from the site at Wythall and 2.6 km from the site at Hollywood.
Compatibility with adjoining uses	None of the adjoining uses (office, museum, residential and leisure) are incompatible with residential development
Availability – land ownership issues	The land is available now and within a single ownership
Delivery	The site can be delivered within 5 years

2 Is the BDP Justified

2.1 The BDP Guidance Note states that in order for the BDP to be **justified** the Plan should be the most appropriate strategy, when considered against the reasonable alternatives. The Plan should be based on a proportionate, robust and credible evidence base.

2.2 PLL do not consider the Plan's evidence base is robust or credible in relation to the identification of land to deliver the housing and employment requirements of the District over the Plan Period up to 2030.

2.3 PLL considers the policies below are not justified and require amendment in order that they meet the tests of soundness. The changes are summarised below and explained within the examination of the Plan's evidence base within this section.

- Policy BDP2 – Settlement Hierarchy Policy – the policy should be flexible to encourage redevelopment of previously developed land outside of the Green Belt.

- BDP3 – Future Housing and Employment Growth – the policy should identify additional land for housing in order meet the requirements of the District up to 2023, as the assumptions on housing delivery are unrealistic. The policy should also resist the re-allocation of land for employment use where there is no realistic prospect of it being delivered over the plan period.

Employment Land Evidence Base

2.4 The most recent employment land evidence base is the Bromsgrove District Employment Land Review 2012 produced by Drivers Jonas Deloitte (DJD).

2.5 The 2012 Review concludes that a minimum of 19.9 hectares of land above that in current occupation is required in the District to accommodate the forecast growth in employment floorspace in the area up to 2030. It recommends that a greater amount of land is required to allow for choice and churn in the market place. Policy BDP3 establishes a target of 28 hectares, i.e. a land allocation 40% over the minimum requirement to allow for choice and churn.

2.6 It is assumed that the target of 28 hectares has been arrived by following the recommendations of the evidence base, which conclude inter alia:

> *"With the exception of a very limited number of sites ranked as 'moderate' the 2012 study does not recommend releasing or de-allocating existing Local Plan employment allocations sites ranked as best, good and moderate."*

2.7 The evidence base identifies Wythall Green Business Park as a large site in the Rural East part of the District. In evaluating the site it is not always clear how DJD differentiate between the existing office floorspace and the remaining development land including the objection site. It recognises that the quality of the existing portfolio [existing office space] is good and set within attractive landscaping with good access to car parking. However, paragraph 6.102 notes that "the vacant part of the site has been available for a number of years" [20 years]. It states that "there is no apparent marketing of the site", although the site is being marketed actively and no contact was made by DJD with the site owners. It recognises that the owner [PLL] has attempted to maintain an outline planning permission on the site and interprets this as the site owner as being supportive of employment uses, which, of course, PLL has been to date. The concluding remarks on the remaining land are

that it notes that the interest from potential occupiers is more limited due to the fact there has been no take up of this land for the last 20 years.

2.8 PLL has actively marketed the business park site and has remained committed to completing the development of the business park. However, ultimately this approach has not been successful and the position is unlikely to change unless the approach to completing the business park site changes. PLL considers this is compelling evidence that the undeveloped land is not attractive to the market. This is partially acknowledged by the evidence base. However, inconsistent with this recognition the site is awarded a high score for market attractiveness (see below).

Sub Area	Site	Market Attractiveness	Sustainability	Economic Policy	Classification
Rural East	Wythall Green Business Park	3-4	1-2	2	Good

2.9 The result of this is that the site is given an overall rating of 'good' rather than the appropriate rating of 'moderate' (see below).

Sub Area	Site	Market Attractiveness	Sustainability	Economic Policy	Classification
Rural East	Wythall Green Business Park	2	1-2	2	Moderate

2.10 PLL consider the entire undeveloped site should be classified as 'moderate' and that it is entirely appropriate to identify an element of the site, i.e. the objection site (comprising approximately 3.8 hectares), as being a 'limited exception for de-allocation' as recommended in the 2012 study.

Housing

2.11 The most recent housing evidence base is the Strategic Housing Land Availability Assessment (SHLAA, 2013) and Worcestershire Strategic Housing Market Assessment (SHMA, 2012). This evidence underpins the Council's proposed housing land supply to deliver 4,600 homes by 2023 with the remaining land identified following a comprehensive Green Belt Review. The source of the housing land supply is summarised below:

- Housing completions since 2011 – 386 homes
- Commitments with planning permission - 1,052 homes
- 3 Bromsgrove expansion sites – 2,106 homes
- Development sites (previously areas of development restraint) – 179 homes
- 'Other' sites (land with some potential for housing development) – 421 homes
- Windfall allowance – 480 homes

2.12 PLL consider it is important to acknowledge the reliability of the 2012 SHMA has recently been questioned by the Inspector's Interim Conclusions of the Examination of the South Worcestershire Development Plan in a letter dated 28th October 2013. The Inspector asked the joint Council's to undertake further modelling and analysis in order to derive an objective assessment of housing need over the Plan period. As Bromsgrove

District Council is using the same report as part of its evidence base, the same criticism in relation to the BDP's robustness must be valid.

2.13 PLL considers the delivery of 4,600 homes on the above sites is unrealistic and further provision must be identified in order to the Plan to be credible and robust. Whilst it is reasonable to include commitments in full, it is unrealistic for the three Bromsgrove expansion sites to be delivered by 2023. This would require a delivery rate of 210 homes per year on these sites alone, which is a level only achieved across the entire district once in the past 5 years (see below). Furthermore, it is not realistic to assume 421 homes will be delivered on sites, which include those with previous planning refusals.

	2008/09	2009/10	2010/11	2011/12	2012/13
Total completions	159	72	122	256	130

2.14 Finally, it is not considered realistic to assume 480 homes will be delivered on windfall sites given the substantial constraint on land availability as a result of over 90% of the District being Green Belt. The likely reality is that the level of windfall housing will reduce significantly as realistic housing development sites outside of the Green Belt diminish.

Summary

2.15 The plan is not the most appropriate strategy when considered against reasonable alternatives. An amendment to Policies BDP2 and BDP3 is required in order that the District can meet its objectively assessed housing and employment requirements. The proposed amendments are set out in section six of this report.

3 Is the BDP Effective?

3.1 The BDP Guidance note states that in order to be **Effective** the BDP should be:

- Deliverable over its identified time period
- Based on effective joint working on cross-boundary strategic priorities.
- Flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals.

3.2 The proposed employment allocation at the Wythall Business Park site is not deliverable in its entirety within the plan period as evidenced within section two above. The undeveloped land on the site has remained undeveloped for over twenty years despite maintaining an extant planning permission and marketing the site.

3.3 The District's housing requirement is not going to be delivered within the time period identified, i.e. up to 2023, as insufficient land is allocated to allow sufficient flexibility if market or physical constraints restrict development of those sites identified. There is also a significant risk in assuming sites within the supply that have previous planning application refusals, as well as relying on a substantial element of windfall provision in a District constrained by Green Belt.

3.4 PLL does not consider the plan is sufficiently flexible to deal with changing circumstances. In order to be effective the Plan must identify further land for housing development and take a pragmatic approach towards identifying genuinely deliverable employment land.

3.5 PLL proposes the objection site should be identified for housing land development, which would introduce an appropriate and sustainable mix of uses within the business park. The allocation will make the Plan effective in providing flexibility that will genuinely deliver much need housing land. It will also maximise the re-use of previously developed land.

4 Is the BDP consistent with National Policy?

4.1 The BDP Guidance note states that the BDP should be **Consistent with National Policy.** PLL does not consider that the BDP is not consistent with National Policy for the following reasons (see section 2 for explanation):

- The plan does not identify sufficient land to meet the housing needs of the District for 15 years and indeed, the land identified is unlikely to deliver housing sufficient to meet the requirements of the next ten years (paragraph 47).

- The plan fails to avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of the site being used for that purpose (paragraph 22).

4.2 In order to be consistent with national planning policy the Plan should identify further land for housing development including the objection site and apply a pragmatic approach to the reallocation of employment land that has remained vacant for a significant length of time, specifically the objection site.

5 Is the BDP Positively Prepared

5.1 The BDP Guidance note states that in order to be **Positively Prepared** the BDP should be:

- Prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

5.2 The proposed strategy does not seek to meet the objectively assessed housing and employment development requirements of Bromsgrove throughout the Local Plan period.

5.3 In relation to housing, it does not allocate sufficient land to ensure the delivery of the District's housing requirements for the Plan period and in particular for the next 10 years. A more flexible strategy must be adopted if the BDP is to be considered positively prepared. The allocation of the objection site would assist in ensuring the BDP is positively prepared.

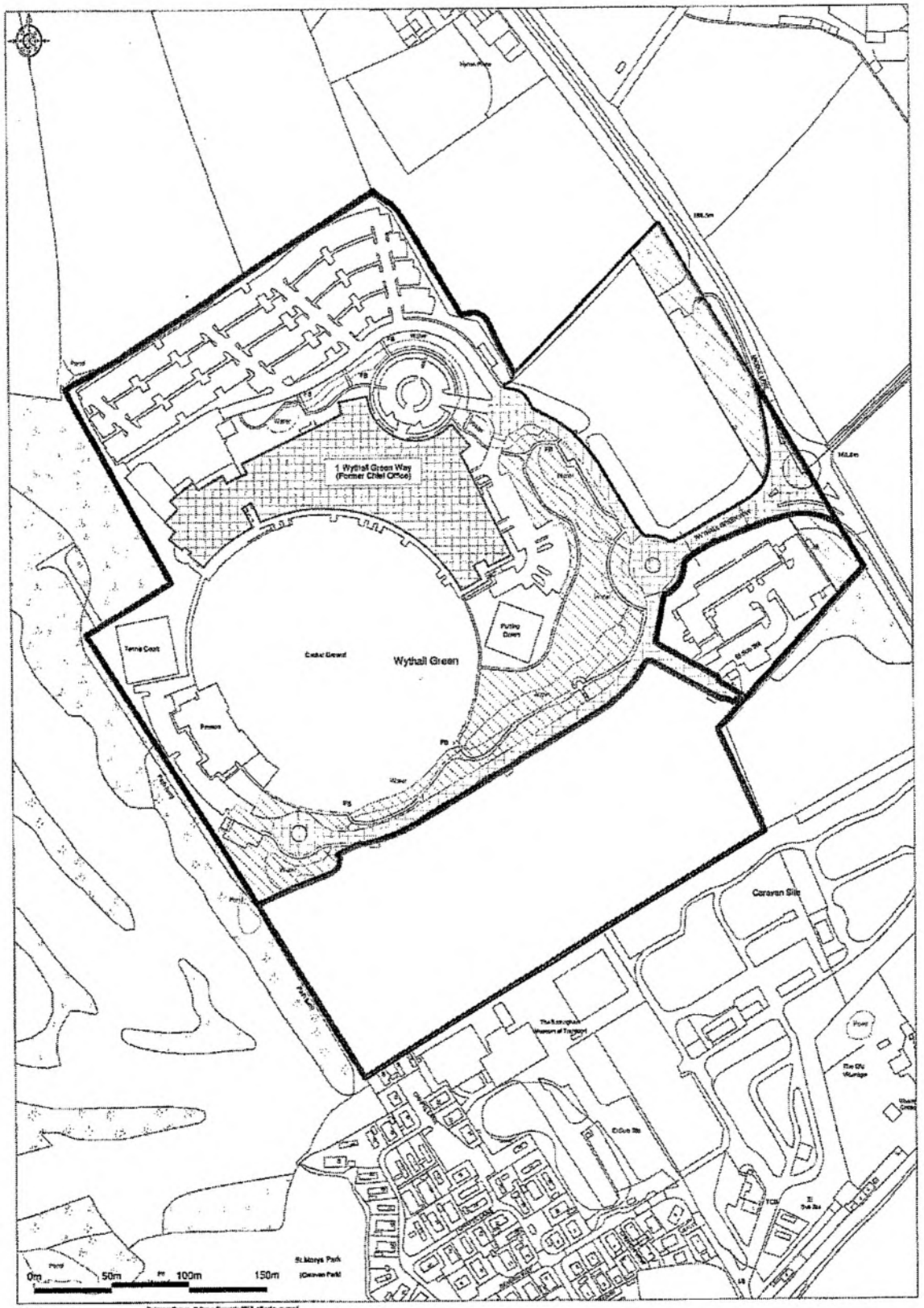
5.4 In relation to employment the BDP identifies a 40% 'buffer' of employment land over the minimum land requirement, which includes reallocation of employment sites that have not been delivered despite being allocated for a significant period of time. The objective assessment of the Wythall Green business park site demonstrates that delivery of employment land across the whole site will not be achieved. In order to be positively prepared the objection site should be allocated for residential development in order to introduce an appropriate and sustainable mix of uses within the business park and maximise the re-use of previously developed land.

6 Proposed Changes to Address Representations

6.1 In order for the BDP to meet the tests of soundness the following amendments are proposed:

- Amendment to the key diagram to identify residential allocation to the south of the retained employment allocation at Wythall Green Business Park.
- BDP2.3 amended to read "development sites in or adjacent to large settlements and on previously developed land outside of the Green Belt"
- The objection site to form part of the 'supply' of housing land under category of 'other sites'. The anticipated capacity of the site is approximately 120 homes (assuming approximately 30 dwellings per hectare). Other sites total to increase by 120 to 541.
- Policy BDP3 amended to include an increased target for the period 2011-2023 reflecting the capacity of the objection site. The employment land allocation in hectares should be amended from 28ha to 25ha.
- Explanation of the proposed allocation described within 'other development sites' section in Wythall at paragraph 8.69.
- Policy 5B to identify the objection site with an accompanying plan (see appendix 1). It should defined the site area (3.8 hectares approximately), that it is suitable for housing with a potential capacity of 120 homes.

Appendix 1 – Objection Site Plan



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