

**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)

Café Quote 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

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

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

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

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 Proposed Submission Document deals with Redditch Cross Boundary Development. It is based on the Council's Housing Growth Study which concentrated only on the development needs of Redditch. It is accepted that within the boundaries of Redditch there is only limited capacity to accommodate around 3000 dwellings and there is need to look at land outside the Borough boundary to accommodate further growth to 2030.

However Redditch Cross Boundary Development in the Proposed Submission Document does not properly take into account the wider needs of the region, in particular Birmingham's enlarged housing needs, and nor is there sufficient flexibility in the proposals to allow for additional housing to meet growth in local need should that be required in the longer term within the Plan period.

Redditch has a less than 5 year housing land supply and the housing growth provision underestimates the local need over the plan period. The broad area appraisal in the Housing Growth Development Study on which the proposed cross boundary development policies in the Submission Document are based has assessed a large number of areas around the fringe of the present built up area of Redditch and concentrated attention on the North West side of the town.

In particular it is our concern that the Study too quickly dismissed possible additional development land north west of Redditch in Area 4, where there is further opportunity to increase housing provision or set aside further land for development in the long term.

Such further release of land in that area would have only limited impacts on landscape, agricultural land, and the Green Belt. The Policy approach appears to rely solely on meeting the minimum of local need while ignoring additional housing need identified in the WMRSS Phase 2 Panel Report with a necessary buffer of land for the future housing needs of Redditch and the wider regional need for additional housing, some of which will need to be located outside of the West Midlands conurbation.

While the identification of Foxlydiate and Brockhill appears to have merit in broad terms, more land in those area should be identified to address the above matters, and also on the south side of the town.

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)

Further land in Foxlydiate and Brockhill should be removed from the Green Belt for future housing needs and allocated either for development within the plan period and/ or as areas of development restraint for longer term housing needs. These areas have been identified as having the least disadvantages for development and additional provision of such housing land will give Redditch a buffer of residential land suitable for development in the longer term

**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       | YES                      |

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

**We wish to explain why the positive inclusion of suitable, deliverable and available land in the Foxlydiate area would allow for increased development to meet longer term housing needs for Redditch and the wider area.**

|           |  |                        |
|-----------|--|------------------------|
| Signature |  | Date: 11 November 2013 |
|-----------|--|------------------------|

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Café Quote Ltd

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

|               |                 |                 |
|---------------|-----------------|-----------------|
| Page: 45      | Paragraph:      | Policy: RCBD1.1 |
| Policies Map: | Other document: |                 |

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①

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②

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XB008/13 → in Redditch Neqs

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