

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)

Tertia Latham-Marr

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

Page:22	Paragraph:BDP3.1	Policy:BDP1 Development Targets
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)

The BDP is not compliant as it fails to meet the identified housing requirement. It is noted that a full Green Belt review is required in order to meet the housing requirement. This review should be undertaken and sufficient housing land identified to demonstrate that the BDP can meet its assessed housing requirement in a sustainable manner prior to the adoption of the Local Plan.

Paragraph 83 of the National Planning Policy Framework states that 'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.' Failure to undertake a necessary Green Belt boundary review as part of Local Plan adoption process is contrary to the NPPF. Stating an intention to undertake a review prior to the adoption of the Local Plan is recognition of this failure to comply.

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)

A full Green Belt review should be undertaken prior to the adoption of the BDP. As a result of this review sufficient land should be identified to meet the total housing requirement for the total plan period, for the plan to be robust and valid.

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

Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
-------------------------------	---

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 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 is unsound as it has not been positively prepared. The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, in accordance with the NPPF. However this plan fails to meet its assessed housing requirement in a positive and sustainable manner.

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)

A full Green Belt review is required in order to identify sufficient land to meet the 2400 dwelling shortfall during the plan period, in a positive and sustainable manner.

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.

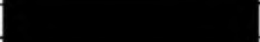
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

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: 	Date: 8/11/2013
--	-----------------

66/2

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)

Tertia Latham-Marr

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

Page:25	Paragraph:	Policy:BDP4 Policy 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: 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)

The BDP is not complaint as it refers to a future Green Belt review. Paragraph 83 of the National Planning Policy Framework states that 'Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.' Failure to undertake a necessary Green Belt boundary review as part of Local Plan preparation process, and prior to adoption of the Plan, is contrary to the NPPF.

The BDP recognises a need for a further Local Plan Review in paragraph BDP4.2, thus recognising that this plan is not robust or comprehensive as a document. It should not be adopted until it is a comprehensive and robust document that identifies sufficient land to meet the assessed needs of the Borough.

BDP4.4 does not allow for any windfall development in the Green Belt. Previously developed sites in sustainable locations in the Green Belt could provide needed housing land within the Borough. The BDP acknowledges that 90% of the Borough is designated as Green Belt, more flexibility needs to be allowed to consider the redevelopment of Green Belt brownfield sites that could become redundant during the plan period. Allocation of such sites as Major Developed Sites in the Green Belt would assist in this.

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)

A full Green Belt review should be undertaken prior to the adoption of the BDP. As a result of this review sufficient land should be identified to meet the total housing requirement for the plan period, so doing would ensure that the document is robust and valid and not reliant on a future Local Plan Review.

Paragraph BDP4.4 should acknowledge the redevelopment potential of brownfield Green Belt sites in sustainable locations and the contribution these could make to meeting the housing requirement. The potential conversion of commercial buildings, in the Green Belt, to residential use should also be recognised in accordance with the thrust of Central Government planning policy. Allocation of larger previously developed sites in the Green belt would provide additional clarity of their redevelopment potential.

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

Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
-------------------------------	---

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 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 is unsound as it has not been positively prepared. The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, in accordance with the NPPF. However this plan fails to meet its assessed housing requirement in a positive and sustainable manner. This plan currently recognises that it has failed to meet the Councils own assessed housing requirement and that a future Local Plan Review, and a full Review of the Green Belt, is required prior to the end of this plan period (ie in 2023).

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)

A full Green Belt review is required in order to identify sufficient land to meet the 2400 dwelling shortfall during the plan period, in a positive and sustainable manner.

Paragraph BDP4.4 should acknowledge the redevelopment potential of brownfield Green Belt sites in sustainable locations and the contribution these could make to meeting the housing requirement. The potential conversion of commercial buildings, in the Green Belt, to residential use should also be recognised. Larger previously developed sites in the Green Belt should be allocated as Major Developed Sites, and their redevelopment potential for residential or commercial purposes should be recognised.

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: 	Date: 8/11/2013
--	-----------------