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

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. To which part of the	BDP does this representation relate	?
Pogo:	Paragraph:	Policy: BDP 2
Page: Policies Map:	Other document:	
ocument, for example	does not relate to a specific part of the the Sustainability Appraisal, please BDP is legally compliant? (see Note	
Yes:□	No:□	
regard to the issue(s) y	you have identified above. You will n . It will be helpful if you are able to pu	o make the BDP legally compliant, having eed to say why this change will make the ut forward your suggested revised wording
regard to the issue(s) y	you have identified above. You will n . It will be helpful if you are able to po lease be as precise as possible. (Cor	eed to say why this change will make the
egard to the issue(s) y DP legally compliant. f any policy or text. P see Note 8 para 4.3)	you have identified above. You will n . It will be helpful if you are able to po lease be as precise as possible. (Cor	eed to say why this change will make th ut forward your suggested revised wordi

2 of 42

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

6. Please give details of why you consider the 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 definition of permissible development in the settlement hierarchy renders the plan ineffective. The reason for this is that in relation to the two upper tier settlement types the phrase "Residential development of a scale proportional to the sustainability of the settlement" that appears in Table 2, which is linked to the policy, lacks sufficient precision. It is ineffective as a policy tool - to be effective policies need to be robust instruments of the determination of applications.

74/1

In the writer's view a useful test in any policy is whether for monitoring purposes there is a read measuring tool available directly from the wording used in the policiy. The phrase 'a scale proportional to the sustainability of the settlement is not helpful to this. This feature renders the policy inconsistent with national policy which seeks a meaningful monitoring as an integrated extension of the policies.

The foregoing also is indicative of a lack of positive preparation.

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)

ewrite the policy to take into acco	unt the above comments.	

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

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

No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	□X

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

To participate in the dialogue which the Inspector will have regard to in assessing the Plan.	

Signature	Date:11/11/2013
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Please use a separate Part B form for each representation you wish to make

Billingham and Kite Ltd.	
To which part of the B	DP does this representation relate?
Page:	Paragraph: Policy: BDP 3
Policies Map:	Other document:
ocument, for example to	es not relate to a specific part of the document, or it relates to a different he Sustainability Appraisal, please make this clear in your response.
. Do you consider the B	BDP is legally compliant? (see Note 2)
Yes:□	No:□X
ossible. If you wish to s	why you consider the BDP is not legally compliant. Please be as precise as support the legal compliance of the BDP, please also use this box to set out on a separate sheet /expand box if necessary)
There is a failure to take into account needed to be taken of	account National Policy to an extent that it amount to a failure of the legal duty in relation to the of national policy.
regard to the issue(s) you	hange(s) you consider necessary to make the BDP legally compliant, having but have identified above. You will need to say why this change will make the to will be helpful if you are able to put forward your suggested revised wording ase be as precise as possible. (Continue on a separate sheet /expand box if necessary)
	dly in accordance with the observations as set out in the representations on this policy.
5. Do you consider the B	BDP is sound? (see Note 3)
Vee-	No:□X

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

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 heart of this objection has two strands.

Firstly there is reliance by the Council on the Worcestershire Strategic Housing Market Assessment 2012. This has been found to be flawed by the Inspector conducting the South Worcestershire Core Strategy for reasons which suggest the estimates of housing need are inadequate owing to assumptions which are not well founded.

Secondly inappropriate regard is paid to the needs to accommodate flows of households from adjacent authorities, particularly Birmingham. The Plan acknowledges an emerging need for substantial additional housing to meet Birmingham's housing requirements which that authority cannot meet within its own boundary. The figure is presently reported to be of the order of 30,000 households over Birmingham's plan period. The plan fails to make express provision for the migration which will ensue from the shortage within Birmingham.

Having regard to the fact that 90% of housing transactions involve the second hand housing market, such households as cannot meet their needs in Birmingham will seek to migrate whether express provision is made elsewhere or not. A failure to take this migratory force into account will have knock on effect on the achievement of a sustainable pattern of development unless it is properly planned for. Census and other data sources facilitate robust prediction of likely destinations of the unmet pressures for Birmingham households, and having regard to this it is quite appropriate to seek to make the necessary provision now.

In addition to these key matters any resultant calculation of five year supply needs should in the first instance be set at five years plus 20% of the balance as the Council have shown (through appeal decisions over a period of time) that they have not been able to be relied upon to deliver the required housing need to meet long established national policy requirements.

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)

Regrettably I think the Council must be asked to revisit the housing numbers entirely afresh. It is likely (having regard to the advanced stage of the Greater Birmingham and Solihul LEP housing work) that this can be completed within a reasonable time, and it is suggested the Local Plan process be held in abeyance to enable this to take place.

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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		o, I do not wish to participate at the oral examination
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s		necessary. (Continue on a separate sheet /expand box if necessory participate in the dialogue which the Inspector will have

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Yes:□

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

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Policy: BDP 4 Page: Paragraph: 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:□X 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 failure to properly address housing need (as set out in the response to policy BDP 3 renders the Green Belt policy non compliant also. 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) Revisit the Housing Figures and redraw Green Belt boundaries now to secure the required level of housing for the entire plan period 5. Do you consider the BDP is sound? (see Note 3)

No:□X

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74/3

(1) Justified (see Note 4)	□X
(2) Effective (see Note 5)	
(3) Consistent with national policy (see Note 6)	□X
(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)

The failure to make provision for objectively assessed housing need means that the Green Belt policy cannot be considered sound. The essential feature of Green Belt policy is its permanence, and the Plan needs to address securing green Belt boundaries that will endure. Provision needs to be made to alter the Green Belt boundaries now and land to the north of Hagley and to the east of the A38 adjoining Bromsgrove should be take out of the Green Belt as part of this Local Plan process.

Much of the detailed assessment required for amending the Green Belt boundary was undertaken as part of the approval process for the Bromsgrove Local Plan 2004 and this work can be revisited by the Council in taking matters forward

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)

Revise the Green Belt boundaries to meet the requirements of making policy BDP 3 sound and legally compliant.

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

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

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

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)

To participate in the dialogue which the Inspector will have regard to in assessing the Plan.

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Signature:	Date:11/11/2013

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

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Paragraph: 8.66 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)

No:□X

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

Yes:□

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(4) Listified (see Note 4)		
(1) Justified (see Note 4)		
(2) Effective (see Note 5) (3) Consistent with national policy (see Note 6)		
(4) Positively prepared (see Note 7)		
(4) Positively prepared (see Note 1)		
 Please give details of why you consider the BDI you wish to support the soundness of the BDP, ple Continue on a separate sheet /expand box if necessary) 	ease also	use this box to set out your comments.
The paragraph refers to 38 dwellings being deliven has been submitted for 24 dwellings. The remain for well in excess of that stated - probably about paragraph should make clear that the quantum is	ning land 25 - 28 d	n the Hagley strategic site has capacity wellings depending on design. The
7. Please set out what change(s) you consider ne the test you have identified at 6 above. You will ne sound. It will be helpful if you are able to put forwatext. Please be as precise as possible. (Continue on para 4.3)	eed to say ard vour s	why this change will make the BDP uggested revised wording of any policy or
Alter the content of the paragraph to reflect the a	above con	nments.
Please note your representation should cover su information necessary to support/justify the represent normally be a subsequent opportunity to make representation at publication stage.	sentation	and the suggested change(s), as there will
After this stage, further submissions v Inspector, based on the matters and is	will be o	nly at the request of the e/she identifies for examination.
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part of the examination? Please note the Inspect adopt to hear those who have indicated that they 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	ination examination in examination	articipate at the oral part of the
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Please use a separate Part B form for each representation you wish to make

Billingham and Kite Ltd	1.	
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Policies Map:	Other document:	
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Yes:□	No:□X	(
ossible. If you wish to		egally compliant. Please be as precise as BDP, please also use this box to set out sary)
For reasons which are set of housing need in breach of pro-	ut in response to policy BDP 3 there is insuff roper interpretation of Government Policy	ficient land allocations to meet objectively assessed
regard to the issue(s) you BDP legally compliant. I of any policy or text. Ple (see Note 8 para 4.3)	ou have identified above. You will not will be helpful if you are able to purase be as precise as possible. (Con	o make the BDP legally compliant, having eed to say why this change will make the at forward your suggested revised wording tinue on a separate sheet /expand box if necessary
Undertake the review of	of housing need as set out in respon	se to BDP 3
5. Do you consider the 5	200 :	
	RIP IS SOUTH / ISSO NOTO SI	
Ves:	BDP is sound? (see Note 3)	

11 of 42 10/11/2013

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

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)

nsufficient housing to the west.	ng land has beer	allocated and pr	ovision within Br	romsgrove is too he	eavily weighted

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 ar Bromsgrove.	and is considered appr nd allocated for housin If further land is need msgrove should be lar	g in preference to ded then it is subm	some of the land on itted the first port of	the western side of	of

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

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No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	□X

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

To participate in the dialogue which the Inspector will have regard to in assessing the Plan.	

Date:11/11/2013	
	Date:11/11/2013

Yes:

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

Billingham and Kite	Ltd.	
		2012
 To which part of th 	e BDP does this representation rela	ate?
Page:	Paragraph:	Policy: BDP 5B
Policies Map:	Other document:	1 0109, 22, 22
document, for examp		f the document, or it relates to a different use make this clear in your response.
Yes:□	No:	□X
possible. If you wish to your comments. (Cont	to support the legal compliance of ti inue on a separate sheet /expand box if nec	ot legally compliant. Please be as precise as the BDP, please also use this box to set out tessary) sufficient land allocations to meet objectively assessed
regard to the issue(s) BDP legally complian	you have identified above. You will tt. It will be helpful if you are able to Please be as precise as possible. (0	y to make the BDP legally compliant, having I need to say why this change will make the put forward your suggested revised wording Continue on a separate sheet /expand box if necessary)
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No:□X

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

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)

sufficient housing land has been allocated.	

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)

Allocate further land at Hagley to the north of the set development on the southern part of the settlement. station and village facilities.	tlement in or Land to the	der to counter to north is well re	palance the lated to the rail

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

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No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	□X

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

cipate in the dialogue which the Inspector will have regard to in assessing the	Plan

Signature	Date:11/11/2013
-	

Yes:

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

Billingham and Kite L	td.	
1. To which part of the	BDP does this representation relat	ee?
Page:	Paragraph:	Policy: BDP 6
Policies Map:	Other document:	
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Yes:□	No:	X
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10/11/2013

No:□X

(1) Justified (see Note 4)	$\square X$						
(2) Effective (see Note 5)	⊤□x	1					
(3) Consistent with national policy (see Note 6)	□Х	1					
(4) Positively prepared (see Note 7)							
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he test you have identified at 6 above. You will ne cound. It will be helpful if you are able to put forwa	rd your	ay wny tni	d revi	inge w ised w	ordina	of any po	olicy or
ext. Please be as precise as possible. (Continue on para 4.3) Redraft the policy to ensure compliance with legi-	a separat	suggeste e sheet /exp	pand bo	ox if nec	cessary) (see Not	e 8
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Signature:

Date:11/11/2013

Yes:□

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

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Policy: BDP 7 Paragraph: Page: Other document: Policies Map: 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)

74/8

No:□X

Do you consider the B	DP is unsound	because it is not:
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(1) Justified (see Note 4)	□X
(2) Effective (see Note 5)	□X
(3) Consistent with national policy (see Note 6)	
(4) Positively prepared (see Note 7)	

6. Please give details of why you consider the 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 failure to take justify the assertions with	account of the operations of the housing market and insufficient evidence to in the policy.

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)

Either delete the policy or revise substantially after taking into account fully the operational flows of households through the housing market.				

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

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

No, I do not wish to participate at the oral examination	
Yes, I wish to participate at the oral examination	□X

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)

participate in the dialogue which the Inspector will have regard to in assessing the F

Signature	Date:11/11/2013	
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Yes:□

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

	d	
1. To which part of the I	BDP does this representation relate	?
Page:	Paragraph:	Policy: BDP 8
Policies Map:	Other document:	
document, for example	pes not relate to a specific part of the Sustainability Appraisal, please BDP is legally compliant? (see Note	
Yes:□	No:□X	(
possible. If you wish to		egally compliant. Please be as precise as BDP, please also use this box to set out eary)
Continues to a parameter con	nmunity. Consideration of this has not been	property discontances.
regard to the issue(s) yo BDP legally compliant. I	ou have identified above. You will no t will be helpful if you are able to pu	o make the BDP legally compliant, having eed to say why this change will make the it forward your suggested revised wording tinue on a separate sheet /expand box if necessary)
regard to the issue(s) you BDP legally compliant. I of any policy or text. Ple (see Note 8 para 4.3) Revisit the policy to as	ou have identified above. You will not will be helpful if you are able to purase be as precise as possible. (Con	eed to say why this change will make the at forward your suggested revised wording tinue on a separate sheet /expand box if necessary) ce the delivery of affordable housing on

No:□X

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(1) Justified (see Note 4)

on site provision can be required.

(a) Fig. ((Note F)		
(2) Effective (see Note 5)	$\square X$	
(3) Consistent with national policy (see Note 6)	□X	
(4) Positively prepared (see Note 7)	□X	
 Please give details of why you consider the BDF ou wish to support the soundness of the BDP, ple Continue on a separate sheet /expand box if necessary) 	o is unso	ound. Please be as precise as possible. If ouse this box to set out your comments.
Whilst flawed as to total quantity the SHMA has shousing needs. Aside from the first five years of deal with backlog is calculated the SHMA considerable with 80% market housing. This fundamits reasoned justification.	their studers some	dy period where the dimensions of need to e 20% of delivery should be affordable
	cassan	to make the BDP sound, having regard to

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)

To participate in the dialogue which the Inspector will have regard to in assessing the Plan.		
	Date:11/11/2013	
Signature	Date: 11/11/2010	

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

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Paragraph: Policy: BDP 10 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)

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

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

Yes:□

74/10

No:□X

(1) Justified (see Note 4)	□X	7
(2) Effective (see Note 5)		7
(3) Consistent with national policy (see Note 6)		1
(4) Positively prepared (see Note 7)		
S. Please give details of why you consider the BDF you wish to support the soundness of the BDP, ple Continue on a separate sheet /expand box if necessary) There is a well established non duplication princione piece of legislation is designed with a particular not trespass upon that area. The Building Regulationing, and it is considered inappropriate and in the latest also also inappropriate for policy to refer to essame rigours of public involvement as the planning the same rigours of public involvement as the same rigours of public involvement as the p	iple which all ar matter ations an efficient atternal stang process	ch operates in public administration. Where er in mind other legisaltive avenues should ddress matters of wheelchair access within the for planning policy to seek to duplicate this. estandards where these are not subject to the ess, and which may change through time. If
there is content of the Lifetime Homes code whice applications, and which is not addressed by the Elembraced by policy should be set out together with within the context of the principles of proportional states.	h is mat Building ith the re	erial to the consideration of planning Regulations, then the criteria to be
7. Please set out what change(s) you consider neather test you have identified at 6 above. You will ne sound. It will be helpful if you are able to put forwatext. Please be as precise as possible. (Continue on para 4.3) Delete reference to Lifetime Homes requirements	eed to sa ard your a separat	ay why this change will make the BDP suggested revised wording of any policy or e sheet /expand box if necessary) (see Note 8
Please note your representation should cover suc information necessary to support/justify the represent normally be a subsequent opportunity to make representation at publication stage. After this stage, further submissions was inspector, based on the matters and is	entation further	and the suggested change(s), as there will representations based on the original only at the request of the
8. If your representation is seeking a change, do y part of the examination? Please note the Inspects adopt to hear those who have indicated that they examination.	ou cons	sider it necessary to participate at the oral etermine the most appropriate procedure to
No, I do not wish to participate at the oral examin Yes, I wish to participate at the oral examination		
9. If you wish to participate at the oral part of the 6 be necessary. (Continue on a separate sheet /expand box		
To participate in the dialogue which the Inspecto	r will ha	ve regard to in assessing the Plan.
Signature	Date	11/11/2013

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

Billingham and Kite L	td.	
. To which part of the	BDP does this representation relation	9?
Page:	Paragraph:	Policy: BDP 12
Policies Map:	Other document:	
locument, for example	does not relate to a specific part of the Sustainability Appraisal, pleas BDP is legally compliant? (see No	he document, or it relates to a different e make this clear in your response. te 2)
Yes:□	No:	
		ssary)
		isary)
egard to the issue(s) y BDP legally compliant. of any policy or text. Pl	you have identified above. You will It will be helpful if you are able to p	to make the BDP legally compliant, having need to say why this change will make the ut forward your suggested revised wording
egard to the issue(s) y BDP legally compliant. of any policy or text. Pl	you have identified above. You will It will be helpful if you are able to p	to make the BDP legally compliant, having need to say why this change will make the ut forward your suggested revised wording
regard to the issue(s) y BDP legally compliant.	you have identified above. You will It will be helpful if you are able to p	to make the BDP legally compliant, having need to say why this change will make the ut forward your suggested revised wording
egard to the issue(s) y BDP legally compliant. of any policy or text. Pl	you have identified above. You will It will be helpful if you are able to p	to make the BDP legally compliant, having need to say why this change will make the ut forward your suggested revised wording
egard to the issue(s) y BDP legally compliant. of any policy or text. Pl	you have identified above. You will It will be helpful if you are able to p	to make the BDP legally compliant, having need to say why this change will make the ut forward your suggested revised wording ntinue on a separate sheet /expand box if necessary
egard to the issue(s) y BDP legally compliant. of any policy or text. Pl	you have identified above. You will It will be helpful if you are able to p	to make the BDP legally compliant, having need to say why this change will make the ut forward your suggested revised wording
egard to the issue(s) y BDP legally compliant. of any policy or text. Pl	you have identified above. You will It will be helpful if you are able to p	to make the BDP legally compliant, having need to say why this change will make the ut forward your suggested revised wording

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

Yes:□

No:□X

(1) Justified (see Note 4)	□Х	٦
(2) Effective (see Note 5)		-
(3) Consistent with national policy (see Note 6)	1= -	1
(4) Positively prepared (see Note 7)		7
Please give details of why you consider the BDF ou wish to support the soundness of the BDP, ple Continue on a separate sheet /expand box if necessary) It is considered that the policy needs to be set with the policy need	thin the	context of Section 122 of the Community
Infrastructure Regulations 2010. Without this the when there is a risk of the legislation being bread be formulated at the outset within the constraints embrace ambiguity and then need to be challeng underpinning the operation of the policy.	hed. It i	is considered important that policy should rather than having a policy which may
7. Please set out what change(s) you consider ned the test you have identified at 6 above. You will ne sound. It will be helpful if you are able to put forwatext. Please be as precise as possible. (Continue on para 4.3)	ed to sa	ay why this change will make the BDP suggested revised wording of any policy or
Insert a phrase to reflect the content of Section 1 2010.		
Please note your representation should cover suc information necessary to support/justify the represent not normally be a subsequent opportunity to make representation at publication stage. After this stage, further submissions we	sentation further	n and the suggested change(s), as there will r representations based on the original only at the request of the
Inspector, based on the matters and is	sues l	he/she identifies for examination.
8. If your representation is seeking a change, do y part of the examination? Please note the Inspector adopt to hear those who have indicated that they examination.	or will de	etermine the most appropriate procedure to
No, I do not wish to participate at the oral examin	nation	
Yes, I wish to participate at the oral examination		
9. If you wish to participate at the oral part of the e be necessary. (Continue on a separate sheet /expand box	examina if necess	ation, please outline why you consider this to
To participate in the dialogue which the Inspecto	r will ha	ave regard to in assessing the Plan.
Signature	Date	2:11/11/2013
Signature		

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

Billingham and Kite Ltd	i	
	BDP does this representation relate	2
. To which part of the B	DF does this representation relate	
Page:	Paragraph:	Policy: BDP 16
Policies Map:	Other document:	
document, for example t	pes not relate to a specific part of the Sustainability Appraisal, please BDP is legally compliant? (see Not	he document, or it relates to a different make this clear in your response.
	No:□	
Yes:	No.L	^
The policy as drafted engage documents in a manner which status it is considered essen	ch render them effectively part of the Develor tial that the content be subject to the same	e Delivery Plan giving effect to policies of those opment Plan. However to achieve development plan scope of public involvement as a Development Plan is in the manner tabled is at worst 'ultra vires' and at
C Please set out what o	hange(e) you consider necessary	to make the BDP legally compliant, having
egard to the issue(s) yo	ou have identified above. You will r t will be helpful if you are able to p	need to say why this change will make the ut forward your suggested revised wording ntinue on a separate sheet /expand box if necessary)
Remove reference to t	hese documents within the policy.	
i. Do you consider the l	BDP is sound? (see Note 3)	

(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)

The policy should make it clear that there is a specific relationship required in law between infrastructure contributions that may be sought and the development under consideration. Section 122 of the Community Infrastructure Levy Regulations 2010 sets these out and the policy should make it clear that its scope is limited by this legislation.

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)

Amend the policy to acknowledge the legal limitations to action that may be available in any particular case.

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	$\Box X$

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

To participate in the dialogue which the Inspe	ector will have regard to in assessing the Plan.

Signature	Date:11/11/2013	
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Please use a separate Part B form for each representation you wish to make

Billingham and Kite Ltd.	
1. To which part of the BDI	P does this representation relate?
Page:	Paragraph: Policy: BDP 19
Policies Map:	Other document:
document, for example the	s not relate to a specific part of the document, or it relates to a different Sustainability Appraisal, please make this clear in your response. P is legally compliant? (see Note 2)
Yes:□	No:□
	oport the legal compliance of the BDP, please also use this box to set out in a separate sheet /expand box if necessary)
regard to the issue(s) you li BDP legally compliant. It w of any policy or text. Pleas	inge(s) you consider necessary to make the BDP legally compliant, having have identified above. You will need to say why this change will make the vill be helpful if you are able to put forward your suggested revised wording the beas precise as possible. (Continue on a separate sheet /expand box if necessary)
regard to the issue(s) you li BDP legally compliant. It w of any policy or text. Pleas	have identified above. You will need to say why this change will make the iill be helpful if you are able to put forward your suggested revised wordin
regard to the issue(s) you because to the issue(s) you because the BDP legally compliant. It was	have identified above. You will need to say why this change will make the iill be helpful if you are able to put forward your suggested revised wordin
regard to the issue(s) you li BDP legally compliant. It w of any policy or text. Pleas	have identified above. You will need to say why this change will make the vill be helpful if you are able to put forward your suggested revised wording the beas precise as possible. (Continue on a separate sheet /expand box if necessary)

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

(1) Justified (see Note 4)	□X	-
(2) Effective (see Note 5)	□X	-
Consistent with national policy (see Note 6) Positively prepared (see Note 7)		-
(4) Positively prepared (see Note 1)		_
Please give details of why you consider the BDF ou wish to support the soundness of the BDP, ple ontinue on a separate sheet /expand box if necessary)	is uns ase als	ound. Please be as precise as possible. If o use this box to set out your comments.
The policy as drafted appears to be generally too could be addressed in an SPD which is referred to c), (d) and (e) are unreasonable in either address Regulations or embracing documents not subject Development Plan process.	o in the sing ma	policy. In particular it is considered items (itters more properly left to the Building
. Please set out what change(s) you consider ned ne test you have identified at 6 above. You will ne ound. It will be helpful if you are able to put forwa ext. Please be as precise as possible. (Continue on	ed to sard your	ay why this change will make the BDP suggested revised wording of any policy or
Revise to say that good design will be sought in a will be delivered in the SPD referred to.		
Revise to say that good design will be sought in a will be delivered in the SPD referred to. Please note your representation should cover such formation necessary to support/justify the representation normally be a subsequent opportunity to make representation at publication stage. After this stage, further submissions was inspector, based on the matters and is sent of the examination? Please note the Inspector adopt to hear those who have indicated that they examination.	coinctly sentation further sues in concorn will de wish to	all the information, evidence and supporting and the suggested change(s), as there will representations based on the original only at the request of the he/she identifies for examination. sider it necessary to participate at the oral part of the
Revise to say that good design will be sought in a will be delivered in the SPD referred to. Please note your representation should cover such formation necessary to support/justify the represent normally be a subsequent opportunity to make expresentation at publication stage. After this stage, further submissions was inspector, based on the matters and is sent of the examination? Please note the Inspector adopt to hear those who have indicated that they include the sent in the sent to the s	coinctly sentation courselves further sues for will de wish to mation	all the information, evidence and supporting in and the suggested change(s), as there will representations based on the original only at the request of the he/she identifies for examination.
Revise to say that good design will be sought in a will be delivered in the SPD referred to. Please note your representation should cover such formation necessary to support/justify the representation necessary to support/justify the representation at publication stage. After this stage, further submissions was personal processed on the matters and is a lift your representation is seeking a change, do you and of the examination? Please note the Inspector of the examination. No, I do not wish to participate at the oral examination. If you wish to participate at the oral examination.	coinctly sentation examina	all the information, evidence and supporting in and the suggested change(s), as there will representations based on the original only at the request of the he/she identifies for examination. sider it necessary to participate at the oral etermine the most appropriate procedure to participate at the oral part of the
Revise to say that good design will be sought in a will be delivered in the SPD referred to. Please note your representation should cover such formation necessary to support/justify the representation normally be a subsequent opportunity to make representation at publication stage. After this stage, further submissions we haspector, based on the matters and is search of the examination? Please note the Inspected adopt to hear those who have indicated that they examination. No, I do not wish to participate at the oral examination.	coinctly sentation or will be sues in action examination	all the information, evidence and supporting in and the suggested change(s), as there will representations based on the original only at the request of the he/she identifies for examination. sider it necessary to participate at the oral etermine the most appropriate procedure to participate at the oral part of the

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

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Policy: BDP 21 Page: Paragraph: Other document: Policies Map: 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) No:□ 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)

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

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

Yes:□

No:□X

74/14

200 1 200 1 (N-1- 4)	□X	1
(1) Justified (see Note 4)		1
(2) Effective (see Note 5) (3) Consistent with national policy (see Note 6)		1
(4) Positively prepared (see Note 7)	1 -	-
(4) Positively prepared (see Note 1)	1	_
. Please give details of why you consider the BDF ou wish to support the soundness of the BDP, ple Continue on a separate sheet /expand box if necessary)	ease als	use this box to set out your comments.
Paragraph (a) appears to imply that new develop high nature conservation value. No justification is	ment sh s availa	ould include the creation of core areas of ble for such a blanket obligation.
7. Please set out what change(s) you consider ned the test you have identified at 6 above. You will ne sound. It will be helpful if you are able to put forwatext. Please be as precise as possible. (Continue on para 4.3)	ed to sa	suggested revised wording of any policy or
Change paragraph (a) accordingly		
onango paragraph (-) assessmo)		
Please note your representation should cover suc information necessary to support/justify the represent not normally be a subsequent opportunity to make representation at publication stage.	sentatio	n and the suggested change(s), as there will
	dii ba	only at the request of the
After this stage, further submissions winspector, based on the matters and is	sues	ne/she identifies for examination.
o is		sider it necessary to participate at the oral
8. If your representation is seeking a change, do your representation? <i>Please note the Inspect</i>	or will d	etermine the most appropriate procedure to
adopt to hear those who have indicated that they	wish to	participate at the oral part of the
examination.		
N-11-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-1-	notion	
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 obe necessary. (Continue on a separate sheet /expand box	examina if necess	tion, please outline why you consider this to ary)
To participate in the dialogue which the Inspector	r will ha	ve regard to in assessing the Plan.
Signature:	Date	:11/11/2013
Oignature.		

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

Yes:□

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

Billingham and Kite L	d.
	BDP does this representation relate?
Page:	Paragraph: Policy: BDP 22
Policies Map:	Other document:
document, for example	pes not relate to a specific part of the document, or it relates to a different the Sustainability Appraisal, please make this clear in your response. BDP is legally compliant? (see Note 2)
Yes:□	No:□X
possible. If you wish to	f why you consider the BDP is not legally compliant. Please be as precise as support the legal compliance of the BDP, please also use this box to set out e on a separate sheet /expand box if necessary)
regard to the issue(s) y BDP legally compliant. of any policy or text. PI	change(s) you consider necessary to make the BDP legally compliant, having but have identified above. You will need to say why this change will make the it will be helpful if you are able to put forward your suggested revised wording ease be as precise as possible. (Continue on a separate sheet /expand box if necessary
regard to the issue(s) y BDP legally compliant. of any policy or text. PI (see Note 8 para 4.3)	ou have identified above. You will need to say why this change will make the it will be helpful if you are able to put forward your suggested revised wording

No:□X

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(1) Justified (see Note 4)							
(2) Effective (see Note 5)							
(3) Consistent with national policy (see Note 6)	□X						
(4) Positively prepared (see Note 7)	□Х						
 Please give details of why you consider the BDF ou wish to support the soundness of the BDP, ple Continue on a separate sheet /expand box if necessary) 	ease al	so use	this i	oox to	set out	your com	nents.
The policy as drafted goes beyond the scope of e appropriate in the NPPF and as such embraces a the development industry.	energy a lack o	efficier f positi	ive pr	neasur repara	es cons tion in e	idered as erecting ob	stacles to
Diagon and out what change (c) Vall consider ne					Daning	having re	dard to
7. Please set out what change(s) you consider new he test you have identified at 6 above. You will new sound. It will be helpful if you are able to put forwat ext. Please be as precise as possible. (Continue on para 4.3) Amend policy to delete matters which are control	eed to s ard you a separa	ay why sugge te sheet	y this ested t/expa	revise nd box	ge will need word	nake the B ing of any ary) (see N	policy or
the test you have identified at 6 above. You will necound. It will be helpful if you are able to put forwatest. Please be as precise as possible. (Continue on para 4.3) Amend policy to delete matters which are control of the policy the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to	eed to sard your a separa	all the	y this ested lexpa	revise nd box visage	ge will ned word if necessated by the	e NPPF	policy or ote 8
the test you have identified at 6 above. You will ne sound. It will be helpful if you are able to put forwatext. Please be as precise as possible. (Continue on para 4.3) Amend policy to delete matters which are control Please note your representation should cover successful and precessary to support/justify the representation.	eed to sard your a separa	all the	y this ested to leave the see en	revised and box avisage armation and the re-	ge will need word if necessaled by the need the character of the control of the c	e NPPF ance and son the original of the	policy or ote 8
the test you have identified at 6 above. You will not sound. It will be helpful if you are able to put forward. Please be as precise as possible. (Continue on para 4.3) Amend policy to delete matters which are control of the policy the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to delete matters which are control of the policy to	eed to surd you a separa separ	all the an and representation only he/sh	y this ested to lexible the second to the se	revised not box revised not bo	n, evidented character for to parts appropriate approp	e NPPF ance and son the originate at a priate process.	upporting there will inal
he test you have identified at 6 above. You will not sound. It will be helpful if you are able to put forward ext. Please be as precise as possible. (Continue on para 4.3) Amend policy to delete matters which are control information necessary to support/justify the representation normally be a subsequent opportunity to make representation at publication stage. After this stage, further submissions will inspector, based on the matters and is part of the examination? Please note the Inspective adopt to hear those who have indicated that they	eed to sard you a separa separ	all the an and representation only he/sh	y this ested to lexible the second to the se	revised not box revised not bo	n, evidented character for to parts appropriate to parts appropriate to parts appropriate to parts appropriate app	e NPPF ance and son the originate at a priate process.	upporting there will inal

Signature: Date:11/11/2013

To participate in the dialogue which the Inspector will have regard to in assessing the Plan.

Yes:□

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

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Paragraph: Policy: BDP 23 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) No:□X 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) A requirement (para (e)) for engagement with STWA appears to be ultra vires. The Water Acts provide the legislative requirements, including the requisitioning procedures, for the supply of water and sewerage services and planning policy should not seek to duplicate or circumvent this legislative context. 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) Delete paragraph (e) 5. Do you consider the BDP is sound? (see Note 3)

No:□X

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74/16

Do you consider the BDP is unsound because it is	s not:	
(1) Justified (see Note 4)	□X	7
(2) Effective (see Note 5)		
(3) Consistent with national policy (see Note 6)	□X	7
(4) Positively prepared (see Note 7)	□X	
6. Please give details of why you consider the BDF you wish to support the soundness of the BDP, ple (Continue on a separate sheet /expand box if necessary)	ease als	o use this box to set out your comments.
I have misgivings about embracing parts of the C operation the Code allows an overall balancing of policy in a Statutory Development Plan on one is operational sensitivity of the Code.	f one fa sue with	ctor against another, and to concentrate nin that Code fails to take account of the
In relation to (g) not every site is a suitable candibe sensitive to this.	date for	SUDS application and the policy needs to
On item (d) this embraces matters which would be paragraph is considered superfluous.	e addre	ssed in a Flood Risk Assessment, and the
the test you have identified at 6 above. You will no sound. It will be helpful if you are able to put forwatext. Please be as precise as possible. (Continue on para 4.3) Amend the policy to accommodate the observation	ard your a separa	suggested revised wording of any policy or the sheet /expand box if necessary) (see Note 8
Please note your representation should cover sur information necessary to support/justify the represent not normally be a subsequent opportunity to make representation at publication stage.	sentatio	n and the suggested change(s), as there will
After this stage, further submissions was Inspector, based on the matters and is	vill be	only at the request of the he/she identifies for examination.
8. If your representation is seeking a change, do y part of the examination? <i>Please note</i> the Inspect adopt to hear those who have indicated that they examination.	or will a	etermine the most appropriate procedure to
No, I do not wish to participate at the oral exami	nation	
Yes, I wish to participate at the oral examination		□X
9. If you wish to participate at the oral part of the obe necessary. (Continue on a separate sheet /expand box	examina if necess	ation, please outline why you consider this to
To participate in the dialogue which the Inspector	r will ha	eve regard to in assessing the Plan.
	I Date	44/44/2042
Signature:	Date	:11/11/2013

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

Yes:□

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

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Policy: BDP 25 Paragraph: 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) No:□ 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)

No:□X

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74/17

Do vo	u consider	the	BDP is	unsound	because	it	s not:
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Please give details of why you consider the BDF, ple continue on a separate sheet /expand box if necessary) It is considered that the effectiveness of the plan by policy paragraph 25.1 which fails to recognise set out in the table cannot be delivered or adherence the test you have identified at 6 above. You will necessary	in delive that the ed to.	to make the BDP sound, having regard to ay why this change will make the BDP suggested revised wording of any policy or
(4) Positively prepared (see Note 7) Please give details of why you consider the BDF ou wish to support the soundness of the BDP, ple continue on a separate sheet /expand box if necessary) It is considered that the effectiveness of the plan by policy paragraph 25.1 which fails to recognise set out in the table cannot be delivered or adhere the test you have identified at 6 above. You will necessary the test you have identified at 6 above. You will necessary the plan and it will be helpful if you are able to put forward.	P is unsered as a large and the large and the large and the large and the large are a larg	to make the BDP sound, having regard to ay why this change will make the BDP suggested revised wording of any policy or
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7. Please set out what change(s) you consider ned the test you have identified at 6 above. You will necessary to be helpful if you are able to put forwater. Please be as precise as possible. (Continue on	eed to sa	suggested revised wording of any policy or
para 4.3)		
Please note your representation should cover suinformation necessary to support/justify the represent normally be a subsequent opportunity to make	sentatio	n and the suggested change(s), as there will
representation at publication stage.		24.000
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8. If your representation is seeking a change, do your representation? Please note the Inspect adopt to hear those who have indicated that they examination.	or will d	etermine the most appropriate procedure to
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Yes, I wish to participate at the oral examination		□X
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To participate in the dialogue which the Inspector	or will ha	ve regard to in assessing the Plan.

Yes:

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

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Policy: Page:118 (Implentation and Paragraph: Monitoring Other document: Policies Map: 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)

No:□X

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74/18

Doy	/ou	consider	the	BDP	is	unsound	because	it is	not:
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Do you consider the BDP is unsound because it is	s not:	
(1) Justified (see Note 4)	To	7
(2) Effective (see Note 5)	□X	1
(3) Consistent with national policy (see Note 6)	□X	
(4) Positively prepared (see Note 7)	□X	
 Please give details of why you consider the BDF rou wish to support the soundness of the BDP, ple Continue on a separate sheet /expand box if necessary) 	o is uns ease als	ound. Please be as precise as possible. If o use this box to set out your comments.
The Implementation chapter does not embrace a which should commit the Council to a monitoring	policy r program	egarding implementation and monitoring nme.
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with steps necessary to achieve the delivery of the	ie key c	omponents of the ordinary for the press.
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8. If your representation is seeking a change, do your representation? Please note the Inspect adopt to hear those who have indicated that they examination.	or will a	etermine the most appropriate procedure to
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Yes, I wish to participate at the oral examination		
9. If you wish to participate at the oral part of the obe necessary. (Continue on a separate sheet /expand box	examina of necess	ation, please outline why you consider this to eary)
To participate in the dialogue which the Inspector	or will ha	ave regard to in assessing the Plan.
Signature:	Date	e:11/11/2013

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

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Page:137 Housing Trajectory 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:□ 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)

No:□X

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

Yes:

10/11/2013

(1) Justified (see Note 4)		
(2) Effective (see Note 5)	□X	-
(3) Consistent with national policy (see Note 6)	□X	-
(4) Positively prepared (see Note 7)		-
(4) Positively prepared (see Note 7)	Lan	
. Please give details of why you consider the BDP ou wish to support the soundness of the BDP, ple Continue on a separate sheet /expand box if necessary)	ase als	o use this box to set out your comments.
The housing trajectory does not reflect the quantit Representations have been made to relevant poli if accepted the Housing Trajectory needs to be all	cies re	garding the amount of housing required and
7. Please set out what change(s) you consider neothe test you have identified at 6 above. You will ne sound. It will be helpful if you are able to put forware. Please be as precise as possible. (Continue on a para 4.3)	ed to s	suggested revised wording of any policy or
Please note your representation should cover such	ccinctly	all the information, evidence and supporting
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information necessary to support/justify the represent normally be a subsequent opportunity to make representation at publication stage. After this stage, further submissions with the stage on the matters and is the stage.	further	on and the suggested change(s), as there will representations based on the original only at the request of the he/she identifies for examination.
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Please use a separate Part B form for each representation you wish to make

Name or Organisation (see Note 8 para 4.1) Billingham and Kite Ltd. 1. To which part of the BDP does this representation relate? Policy: Page: Key Diagram Paragraph: Other document: Policies Map: 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) No:□ 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)

No:□X

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

Yes:

(A) Large d (and Note 4)	□X	٦
(1) Justified (see Note 4) (2) Effective (see Note 5)		-
(3) Consistent with national policy (see Note 6)	□X	-
(4) Positively prepared (see Note 7)		1
(4) Positively prepared (see Note 7)		_
 Please give details of why you consider the BD you wish to support the soundness of the BDP, ple Continue on a separate sheet /expand box if necessary) 	P is uns ease als	ound. Please be as precise as possible. If o use this box to set out your comments.
Alterations to the key diagram are necessary to f the additional housing that is considered necessary	flow from ary.	representations made elsewhere to secure
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7. Please set out what change(s) you consider ne the test you have identified at 6 above. You will no sound. It will be helpful if you are able to put forwatext. Please be as precise as possible. (Continue on para 4.3) Alter the Key diagram to secure comliance with	eed to sa ard your n a separat	suggested revised wording of any policy or e sheet /expand box if necessary) (see Note 8
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No, I do not wish to participate at the oral exami		
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