

11 November 2013
BDP Representations Covering Letter 11.11.13

savills

Strategic Planning
Planning and Regeneration
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

By email only

Dear Sir / Madam

BROMSGROVE DISTRICT PLAN PROPOSED SUBMISSION CONSULTATION

Please find attached completed representations forms submitted on behalf of Taylor Wimpey in response to consultation on the Bromsgrove District Plan Proposed Submission Document. The progress on the preparation of the Plan is welcomed, and the identification of Perryfields Road (BROM2) within Policy BDP5A Bromsgrove Town Expansion Sites is fully supported as a logical site for development to meet the identified growth needs of the District.

Bromsgrove town is the main centre of population within the district and offers a range of jobs, services, facilities and sustainable transport links. The proposed urban extensions to the west of the town represent the most sustainable location for growth in the District, with sites available on land that has been purposefully excluded from the green Belt to allow for the expansion of the town to meet its future growth needs.

Because of its size, location, accessibility and opportunities for linkages into the existing built up area, the Perryfields site has the ability to deliver mixed-use development with a range of significant benefits including jobs, affordable housing, specialist housing (extra care and care homes) transport infrastructure, public transport, drainage improvements, community and recreation facilities, public open space, paths and footpaths, play areas, and nature conservation enhancement and management.

A report setting out a strategy for the phased development of land to the north west of Bromsgrove at Perryfields Road *Perryfields – A sustainable Urban Extension to Bromsgrove* (April 2011) was submitted in support of our previous representations on the Draft Core Strategy 2. The report sets out a framework for the delivery of the site and provides a summary of the environmental and technical investigations that have been undertaken to date, highlighting that there are no technical or environmental constraints that would compromise the successful development of the site as a sustainable mixed use urban extension.

Since then, significant progress has been made in taking forward the proposals for Perryfields. The preparation of an outline planning application and accompanying Environmental Statement is underway and formal pre-application discussions are taking place with Bromsgrove District Council planning officers.

In summary, the site represents a highly sustainable, viable, well located and deliverable opportunity for a mixed use urban extension to meet identified housing, employment and community needs.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Adventis Plc. Chartered Surveyors. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD





Yours sincerely



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)

Savills

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

Page:	Paragraph: 3.1	Policy:
Policies Map:	Other document:	

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

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

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

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: <input checked="" type="checkbox"/>	No: <input 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 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 key challenges set out at paragraph 3.1 are generally supported, in particular the 3rd and 4th bullet points which recognise the need to ensure an adequate supply of appropriate housing and

employment land, and achieve a balanced population structure and housing market.

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

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


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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 

Date: 7th November 2013

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)

Savills

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

Page: 12	Paragraph: 4.5 4.6	Policy:
Policies Map:	Other document:	

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

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

Yes: No:

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

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

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

Yes: No:

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

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

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

The recognition within the spatial vision for Bromsgrove of the need to achieve a more balanced housing market and to deliver the required level of new housing growth to meet local needs is supported.

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

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


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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 	Date: 7th November 2013
--	-------------------------

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)

Savills

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

Page: 12	Paragraph: 4.7	Policy:
Policies Map:	Other document:	

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

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

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

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: <input type="checkbox"/>	No: <input 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 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 establishment of sustainable urban extensions to the north and west of Bromsgrove town as an integral part of the spatial vision for the area is fully supported. Land at Perryfields Road is central to delivering this aspect of the spatial vision.

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

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


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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 	Date: 7 th November 2013
--	-------------------------------------

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)

Savills

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

Page: 14	Paragraph: 5.1	Policy:
Policies Map:	Other document:	

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

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

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

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: <input checked="" type="checkbox"/>	No: <input 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 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)

Strategic Objective SO2 seeks to focus new development in sustainable locations such as on the edge of Bromsgrove town in the first instance. This objective is supported; Bromsgrove town is the main centre of population within the district and offers a range of jobs, services, facilities and sustainable transport links. Urban extensions to the west and north of the town represent the most sustainable location for growth in the District, with sites available on land that has been purposefully excluded from the green Belt to allow for the expansion of the town to meet its future growth needs.

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

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


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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 	Date: 7 th November 2013
--	-------------------------------------

Part B (see Note 1 and Note 8 para 4.2)

57/5

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

Name or Organisation (see Note 8 para 4.1)

Savills

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

Page: 15	Paragraph: Key Diagram	Policy:
Policies Map:	Other document:	

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

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

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

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: <input checked="" type="checkbox"/>	No: <input 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 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)

<p>The identification of land to the north west of Bromsgrove at Perryfields Road as a Development Site is fully supported. The site represents a highly sustainable and deliverable opportunity for a mixed-use urban extension which is available early in the LDF period.</p>
--

Because of its size, location, accessibility and opportunities for linkages into the existing built up area, the site has the ability to deliver mixed-use development with a range of significant benefits including jobs, affordable housing, specialist housing (extra care and care homes) transport infrastructure, public transport, drainage improvements, community and recreation facilities, public open space, paths and footpaths, play areas, and nature conservation enhancement and management.

A report setting out a strategy for the phased development of land to the north west of Bromsgrove at Perryfields Road *Perryfields – A sustainable Urban Extension to Bromsgrove* (April 2011) has been submitted in support of our previous representations on the Draft Core Strategy 2. The report sets out a framework for the delivery of the site and provides a summary of the environmental and technical investigations that have been undertaken to date, highlighting that there are no technical or environmental constraints that would compromise the successful development of the site as a sustainable mixed use urban extension.

Since then, significant progress has been made in taking forward the proposals for Perryfields. The preparation of an outline planning application and accompanying Environmental Statement is underway and formal pre-application discussions are taking place with Bromsgrove District Council planning officers.

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

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


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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 	Date: 7 th November 2013
--	-------------------------------------

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)

Savills

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

Page: 17	Paragraph:	Policy: BDP1
Policies Map:	Other document:	

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

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

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

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: <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 checked="" type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input checked="" type="checkbox"/>
(4) Positively prepared (see Note 7)	<input type="checkbox"/>

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

The inclusion of a policy in the plan to indicate how the presumption in favour of sustainable development is fully supported. However the list of issues set out in section BDP1.4 are covered elsewhere in the plan and in the NPPF; this section of the policy is unnecessary as it does not provide any further assistance to the decision maker.

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 Policy BDP1 to reflect the model policy recommended by the Planning Inspectorate as follows:

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

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

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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: [REDACTED]	Date: 7 th November 2013
---	-------------------------------------

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)

Savills

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

Page:	Paragraph:	Policy: BDP2
Policies Map:	Other document:	

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

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

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

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)

[Empty box for details of non-compliance]

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)

[Empty box for suggested changes]

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

Yes: <input checked="" type="checkbox"/>	No: <input 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 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 inclusion of Expansion Sites around Bromsgrove Town at point BDP2.2 of the Settlement Hierarchy is supported. Bromsgrove town is the main centre of population within the district and offers a range of jobs, services, facilities and sustainable transport links. The expansion sites to the west and north of the town represent the most sustainable locations available to meet future growth needs; immediate release of these sites for development is required in order to meet identified housing needs.

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

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


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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 	Date: 7 th November 2013
--	-------------------------------------

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)

Savills

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

Page:	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: <input type="checkbox"/>	No: <input type="checkbox"/>
-------------------------------	------------------------------

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: <input checked="" type="checkbox"/>	No: <input 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 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)

<p>The identification of the Bromsgrove Town Expansion Sites for immediate release in BDP3.2 is supported.</p> <p>The inclusion of the Bromsgrove Expansion Sites within the target of 4,600 dwellings on land outside the Green Belt is supported.</p>

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

--

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


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

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

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

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

<p>Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.</p>
--

Signature: 	Date: 7 th November 2013
--	-------------------------------------

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)

Savills

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

Page:	Paragraph:	Policy: BDP5A
Policies Map:	Other document:	

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

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

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

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

--

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

--

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

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

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

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

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

<p>The identification of Perryfields Road as Town Expansion Site (BROM2) is fully supported as a logical site to select through the LDF process for development to meet the identified growth needs of the District. Bromsgrove town is the main centre of population within the district and offers a range of jobs, services, facilities and sustainable transport links. Urban extensions to the west and north of the town represent the most sustainable location for growth in the District, with sites available on</p>
--

land that has been purposefully excluded from the green Belt to allow for the expansion of the town to meet its future growth needs.

Because of its size, location, accessibility and opportunities for linkages into the existing built up area, the Perryfields site has the ability to deliver mixed-use development with a range of significant benefits including jobs, affordable housing, specialist housing (extra care and care homes) transport infrastructure, public transport, drainage improvements, community and recreation facilities, public open space, paths and footpaths, play areas, and nature conservation enhancement and management.

A report setting out a strategy for the phased development of land to the north west of Bromsgrove at Perryfields Road *Perryfields – A sustainable Urban Extension to Bromsgrove* (April 2011) has been submitted in support of our previous representations on the Draft Core Strategy 2. The report sets out a framework for the delivery of the site and provides a summary of the environmental and technical investigations that have been undertaken to date, highlighting that there are no technical or environmental constraints that would compromise the successful development of the site as a sustainable mixed use urban extension.

Since then, significant progress has been made in taking forward the proposals for Perryfields. The preparation of an outline planning application and accompanying Environmental Statement is underway and formal pre-application discussions are taking place with Bromsgrove District Council planning officers.

In summary, the site represents a highly sustainable, viable, well located and deliverable opportunity for a mixed use urban extension to meet identified housing, employment and community needs.

Each aspect of Core Policy 4A) has been considered in turn and comments are set out below.

BDP5A.3 BROM2 (Perryfields Road) will contain a minimum of 1300 dwellings, 5 hectares of local employment land (office and/or light industry), a local centre and community facilities.

The accompanying *Perryfields - a Sustainable Urban Extension for Bromsgrove* document submitted in support of these representations sets out a development framework concept plan that illustrates how these uses can be accommodated on the site. Around 42 hectares of land is shown for residential, community facilities and a local centre, with 5 hectares of land for employment uses. Areas of public open space and formal sports pitches are also proposed.

Ongoing work on the Framework Concept Plan and supporting technical studies being undertaken to inform the outline planning application and supporting Environmental Statement have confirmed that the site can accommodate of at least 1,300 homes in a mix of sizes and tenures, along with employment, local centre and community facilities.

BDP5A.4 A local centre should also be provided on BROM2 that provides a mix of retail and other A class uses. The local centre should be located adjacent to Sidemoor First School, include sufficient parking to cater for its own needs and also the school at busy times and amenity green space should also be provided.

The local centre will create a public square close to the new Sidemoor First School and nursery, around which local shops and services will front. Combining these uses alongside the school encourages linked trips, enhances viability of the local centre and thereby establishing vitality at the core of the development.

BDP5A.5 The community facilities should consist of a community hall, large equipped play areas, sports pitches and an allotment site. There is a specific requirement for adult football pitches adjacent to the King George V playing fields and associated infrastructure including access, parking and changing facilities should also be provided.

The emerging proposals for the Perryfields development have identified an area of land to the north west of the King George V playing fields for the provision of equipped play, sports pitches and accompanying facilities, and allotments. It is anticipated that a community hall will be located with the local centre.

BDP5A.7 It is required that:

a) The residential development reflects the local need of a high proportion of 2 and 3 bedroom properties and contains up to 40% affordable housing (which should include an appropriate mix of

social rent, affordable rent and intermediate housing);

The proposals for Perryfields have the potential to make a significant contribution to meeting the identified needs of the District for open market and affordable housing, and the mix of house types and tenures will reflect this.

The Affordable Housing Viability Study undertaken for Bromsgrove District Council by Level Ltd highlights the viability considerations that need to be taken into account with strategic sites, and notes at paragraph 9.26 that delivery of 30% affordable housing is unlikely to be achieved on BROM2 with their 'middle' market performance scenario. ←

A flexible approach to affordable housing provision is therefore required to take account of viability considerations, and the inclusion of the wording 'up to ...' is welcomed. This section of Policy BDP5A should also acknowledge that the recent Bromsgrove District Housing Trust Development at Perryfields Road has already delivered a proportion of the affordable housing provision for the Perryfields site. ←

b) To address the housing needs of the elderly all dwellings should seek to achieve Lifetime Home Standards and BROM2 should contain an 'extra care' type facility of approximately 200 units;

The emerging Framework Concept Plan for Perryfields includes the provision of an extra care facility.

c) An overall transport strategy will be developed that maximises opportunities for walking and cycling making full use of the Sustrans route No. 5 (in BROM2) and Monarch's Way (adjacent to BROM3);

The proposed urban extension at Perryfields (BROM2) presents numerous opportunities to encourage modal shift through the creation of effective linkages into the existing built up area for pedestrians, cyclists, and bus users. New residents and employees of the site will be encouraged to choose alternative modes of transport, other than the private car, by integrating convenient and direct pedestrian, cycle and bus links into the existing urban area. There is a good network of existing footways and cycleways in the local area providing opportunities for access to public transport, local shops, and other facilities within Bromsgrove. The town centre, with its range of facilities and amenities, is situated within 2km of the site's primary access points and is therefore in line with the requirements of Planning Policy Guidance 13: Transport.

Walking

Pedestrian access will be provided at frequent key points in order to maximise the use of existing footpath and footway links. Pedestrian needs will also be considered at all vehicular access points to ensure that final designs enable travel choice.

In order to deliver safe and comfortable walking conditions within the site and to the wider area, the proposed development will:

- Ensure that local amenities are accessible to pedestrians from the development, thereby reducing the need to travel by car.
- Provide well-connected pedestrian networks to ensure the permeability of the site for pedestrians. This should involve providing clear and direct links for pedestrians to facilities within the site and to existing footpaths in the adjacent Bromsgrove urban area.
- Prioritise pedestrian safety through the provision of, for example, street lighting, wide, safe pavements and good street design.
- Ensure that design takes into account the needs of those with impaired mobility.

Cycling

National Cycle Route 5 intersects the site and provides connections to Bromsgrove town centre to the east and Catshill to the north. This offers significant opportunities for facilitating and encouraging cycling to key destinations where facilities such as schools, shops, employment and leisure opportunities are found.

Measures to promote cycling and to maximise the visibility and attractiveness of this route will be incorporated into the site design, including:

- Coordinating cycle routes as appropriate with the pedestrian networks outlined above.
- Providing an improved route for National Cycle Network 5 through the development which will include the provision of off-road facilities.
- Providing on-site direction signing with distances and cycle times to Bromsgrove town centre and other destinations.
- Road layout designed to help ensure a safe environment for cyclists.
- The provision of adequate cycle parking/storage within the new development.

d) Significant improvements in passenger transport will be required including integrated and regular bus services connecting the new and existing residential areas to the railway station, with the Town Centre as the focal point of the network. In particular, a regular service should be routed through BROM2 and into the residential area of Sidemoor which would provide benefits for the wider community;

Accessibility from the Perryfields site to public transport is good, with bus services travelling along Kidderminster Road, Stourbridge Road and within the existing residential areas to the east. All services provide good access into the town centre.

There are good opportunities to divert existing bus services and the linear nature of the development lends itself well to a high quality, high frequency, orbital service being provided along Perryfields Road which would link to key facilities and amenities in the local area. The advantage of this type of service along Perryfields Road is that all of the proposed development would be located within 400 metres of a bus service and the services can maintain a high frequency as the need to access numerous locations is avoided.

The viability of extending, diverting and increasing the frequency of these existing routes and services is currently being discussed with Worcestershire County Council and it is understood that operators are keen to provide services within the development area. Further consideration in conjunction with Worcestershire County Council is also being given to the layout of bus services across Bromsgrove to help improve accessibility to the train station.

It will be important to ensure appropriate infrastructure is provided to enable safe access and egress from buses and to encourage use of these services. Facilities should include bus priority links, bus shelters, raised kerbs and easily accessible real-time information, so that trip planning is simple and this should include information about routes, clear signing along routes, and clear up to date information at public transport stops.

e) It will be necessary to manage the cumulative traffic impact generated by the new developments following the implementation of measures which maximise the use of walk, cycle and passenger transport modes. All proposals must be subject to appropriate appraisal in consultation with Worcestershire County Council and consistent with LTP3 policies and design standards. Full consideration must be made of the impact on the wider transport network, including that managed by the Highways Agency;

The main vehicular access to and from the Perryfields site is currently provided by Perryfields Road and via its junctions with Kidderminster Road to the south and Stourbridge Road to the north. On line and off line improvements to the geometry and alignment of Perryfields Road will be undertaken to ensure appropriate carriageway widths are provided along with new footways and cycleways.

In addition to improvements along the length of Perryfields Road, new junction arrangements will be provided on Kidderminster Road and Stourbridge Road. Design work is being undertaken in respect of the access road and access points and this will be further informed by the town-wide transport modelling which is being undertaken by Worcestershire County Council Transport team and is being used to inform detailed and extensive Transport Assessment and Travel Plan documents. The work completed to date confirms deliverable highways access solutions are available.

f) Noise and air pollution emanating from the M5 and M42 will need to be addressed ensuring that sensitive land uses and the AQMA at junction 1 of the M42 are not unduly impacted upon;

An assessment of the noise levels affecting the proposed Perryfields development site has been undertaken to establish the master planning constraints resulting from the existing noise climate. Within the site, less noise-sensitive uses, such as employment development, will be located on the parts of the site closer to the M5 and M42 motorways in order to provide noise attenuation and separation for more noise-sensitive uses, such as schools and dwellings. Appropriate noise mitigation measures will be incorporated commensurate with the level of noise, this will include appropriate window design with acoustic ventilation, careful orientation of gardens, and a bund along the western edge of the site.

Background NO₂ concentrations at and around the Perryfields site are low. However an Air Quality Management Area has been declared for NO₂ at Junction 1 on the M42. Future air quality is likely to improve due to the implementation of pollution control measures, such as the introduction of cleaner vehicles, and background monitoring in Bromsgrove shows a decreasing trend in annual mean NO₂ concentrations.

Development at the site is unlikely to adversely affect air quality at the AQMA. However, traffic generated by development is likely to increase on local roads, including those in the town centre. Further investigation to determine the potential effect of the development proposals on local air quality is being undertaken as part of the Environmental Impact Assessment for the planning application.

g) All development must be of a high quality and locally distinctive to Bromsgrove, thereby enhancing the existing character and qualities that contribute to the town's identity and create a coherent sense of place. There should be a continuous network of streets creating a permeable layout and the use of continuous building lines to help define streets;

The *Perryfields – a Sustainable Urban Extension for Bromsgrove* document sets out a development framework concept for the site which provides a unique opportunity to achieve a comprehensive and logical extension to the existing Bromsgrove settlement pattern, and ongoing work on the outline application is taking this forward

Through the delivery of a range of complementary uses and a new and distinctive landscape structure, development at Perryfields will support the creation of a new vibrant and sustainable community. Drawing on the existing landscape context, uses and movement routes, the concept seamlessly 'knits' into its immediate context and brings a series of new and enhanced local facilities, movement routes and a significant strategic landscape structure.

The proposed strategic landscape concept for the site provides the overarching structuring element for the proposal, and will provide a sense of containment for both the development and the wider settlement edge of Bromsgrove. A strategic green corridor 'wraps' around the western edge of the development and provides a significant visual buffer between the development and the M5/ M42 and the wider countryside beyond. Within the development a series of green infrastructure corridors will be created. These corridors will fulfil a range of ecological, hydrological and recreational functions as well as providing visual enhancement and distinctive character to the development. The landscape strategy will reinforce the existing ecological and landscape assets of the site and surrounding area.

Within the landscape structure, the concept creates two distinct development areas. To the northeast a smaller more organic area is formed adjacent to Stourbridge Road. The structure of this area has been informed by the underlying topography, the creation of a series of connecting movement routes and the relationship to the proposed strategic landscape structure to the north. This area will be predominantly residential.

To the south west a larger more formally gridded development area is proposed. Again responding to the adjacent residential development areas of Sidemoor and the existing Sidemoor First School. As well as the formation of a series of linked pedestrian and cycle routes towards Bromsgrove town centre, a mix of residential, employment and local centre mixed uses are proposed.

The local centre will form a new heart within the development. Instinctively located adjacent to the new Sidemoor First School and nursery the local centre will create a public square around which a small element of retail, community hall, extra care facility and employment uses will front. Combining these uses alongside the school encourages linked trips, enhances viability of the local centre and thereby establishing vitality at the core of the development.

To the south west of the local centre a linear strategic employment area is proposed. The position of the employment uses alongside the M5 offers some noise attenuation function for the rest of the development as well as providing new employment opportunities in the area.

A new and extensive network of linked pedestrian and cycle routes are proposed within and through the site. Many routes are extensions of existing pedestrian routes which connect Bromsgrove town centre, and existing residential areas with the open countryside beyond the site. A grid of new routes (including leisure routes) will be formed. These will intersect with existing footpath and cycle routes and provide extensive permeability, particularly to the proposed local centre and employment areas. The route of the existing Housman Trail will be retained and enhanced, with parts of the route located on a new greenway through the site.

A main spine road is proposed through the site to link the two development areas together and to connect the development with the wider movement networks on Stourbridge Road and Kidderminster Road. The alignment of this route will be varied through the development to provide access to the mix of uses proposed in the site as well as naturally traffic calming the route. The alignment of parts of this route will follow the existing Perryfields Road, with some adjustments, and other parts of the existing road will be down graded providing local access to existing and proposed residential development, or part of a pedestrian and cycle greenway route.

h) The development will need to reflect the topography of the sites, with built form avoiding the prominent ridgelines on both BROM1 and BROM3;

See comment in relation to BDP5A.7(j).

i) The sites will have an overall strategy for green infrastructure (incorporating SuDS and blue infrastructure) that maximises opportunities for biodiversity and recreation throughout, creating a green corridor around the Battlefield Brook (BROM2) and in the case of BROM3, links to Sanders Park;

A framework of open space, green infrastructure linkages and habitat areas for nature conservation will be created and managed to meet Worcestershire County Council's stated objectives for biodiversity and Bromsgrove District Council's emerging Local Plan policies.

The on-site green infrastructure framework will be considered along side the objectives of Worcestershire's Sub-Regional Green Infrastructure Strategy. Consultation on a green infrastructure strategy for the site is ongoing as part of the pre-application process.

The proposed green infrastructure corridors will fulfil a range of functions, in line with the aspirations of the 'Bromsgrove Green Infrastructure Baseline Report', including:

- Biodiversity enhancement and protection of features of biodiversity interest, such as the Battlefield Brook;
- Protection and enhancement of landscape fabric of greater interest, with no net loss of the hedgerow resource;
- Protection of historic landscape features identified as being of interest, namely the trackway following the alignment of the Sustrans cycling route;
- Supporting sustainable movement patterns to encourage active lifestyles (as described in Transport Proposals above);
- Incorporation of the Battlefield Brook and associated floodplain;
- Incorporation of sustainable surface water management features (known as SuDS); and,
- Provision of a comprehensive scheme of publicly accessible open space, including opportunities for both formal and informal recreation.

j) Important biodiversity habitats and landscape features should be retained and enhanced with any mitigation provided where necessary. There should be no net loss of hedgerow resource within the sites. Full account should be taken of protected and notable species (e.g badgers, reptiles, water

voles and bats);

Landscape Character and Fabric

A baseline landscape and visual appraisal for the site has been undertaken and confirms that the site does not form part of, nor is near to, any designated landscape. The site lies within the Principal Settled Farmlands Landscape Character Type, a medium scale agricultural landscape, with field parcels defined by hedgerows. The landscape within the site has experienced substantial change in character, particularly in the latter half of the 20th century with the construction of the adjacent M5. The site is much more urbanised and has seen its landscape fabric much denuded in recent decades. As a result, the site is not considered particularly sensitive to change, and it has landscape capacity to accommodate the proposed development. It will be important however to protect, integrate and where possible enhance, the landscape fabric which does remain, particularly that which is characteristic of the Landscape Type.

Opportunities for the retention or enhancement of landscape fabric that have been identified include:

- Sustrans route 5 appears to follow a historic trackway for part of its route within the site. There is currently little vegetation associated with this trackway; development offers the opportunity to enhance the landscaping associated with this route through the provision of hedgerows and tree planting;
- The double hedgerow associated with a right of way which connects to the Sustrans route also appears to follow the alignment of a historic trackway and has the potential to be integrated into a green corridor;
- Battlefield Brook in the northern part of the site and its associated vegetation;
- There is potential for enhancement of the landscaping associated with Perryfields Road to provide a landscape corridor opportunity. Other structural planting will be located to reinforce existing or historic field boundaries or landscape features, where possible, in order to retain the existing landscape pattern; making the landscape history of the site 'readable'.

Existing urban areas in Bromsgrove are frequently characterised by mature street tree planting which creates a wooded setting to residential areas; the proposed development will aim to reflect this townscape character.

Tree planting within the primary streets and open spaces of the proposed development will help to integrate development into its setting over the longer term. This will also provide shelter, and in the summer it will deliver shade and natural cooling, assisting adaptation to climate change.

Ecology and Biodiversity

An Ecological Appraisal of the site was completed by Halcrow during December 2003. This has been updated by EDP during 2009 through a walkover survey, desk study and hedgerow survey. Subsequently, full detailed surveys, completed at the appropriate time of year, have been undertaken for potential habitat and species constraints from 2010 to 2013. In addition, consultation has been undertaken with Natural England and the local Records Centre.

A significant and detailed ecological evidence base is therefore available to demonstrate that the site has no "in principle" ecological constraints and that any ecological constraints that have been identified can be overcome through detailed design and the delivery of measures to avoid, protect, mitigate or compensate.

The site is not covered by any statutory or non-statutory ecology designations, and is considered to be sufficiently distant from any such designations for the proposed development to have no significant impacts. This is consistent with the findings of the "*The Desktop Site Analysis of the Potential Strategic Sites*" prepared as part of the evidence base for the Bromsgrove Core Strategy. This concludes that such designations are "*unlikely to be a constraint to development*".

The site comprises a mix of agricultural, horticultural and amenity uses. Generally, the site has limited habitats of value in their own right. The features of greater value include:

- The Battlefield Brook, due to its linear nature and potential as a wildlife corridor; and

- The hedgerow network. A detailed assessment has been undertaken to identify the hedgerows which would be considered 'important' under the Hedgerow Regulations 1997. Approximately 20% of the hedgerows within the site qualify as ecologically important. In addition to their inherent value, the hedgerows have the potential to support notable/protected species.

In relation to Array Fruit Farm, this has been confirmed as a commercial orchard and is described as an "*Intensively Managed Orchard*" in the Worcestershire Habitat Inventory; as confirmed by the local Records Centre. It is therefore not considered a "*Traditional Orchard*" in the context of the Worcestershire Biodiversity Action Plan. This has been supported by preliminary grassland and invertebrate surveys which were completed during 2010.

None of the other habitats are considered notable in their own right; however some do have potential to support protected and/or notable species including potentially suitable habitat for water vole, otters, bats, badgers, amphibians, reptiles and breeding birds.

Further detailed protected species surveys have been undertaken since 2010 in relation to: bat roosting and foraging; otters; water voles; breeding birds; reptiles, and; badgers. No significant constraints to development have been identified in relation to protected species, however two active badger setts have been identified on parts of the site. The setts and their connections with suitable foraging habitats will be taken into account in the Framework Concept Plan and the emerging outline application.

Ecological considerations that will influence the design and layout include:

- Avoid a net loss of hedgerow resource within the site, retain ecologically important hedgerows, and enhance the diversity, structure and connectivity of the hedgerow resource within the site as part of the site's Green Infrastructure.

- Provide sufficient buffering to the stream corridor to preserve and enhance the habitat.

- The need to retain habitat opportunities for badgers known to be present within part of the site; and

- The need, potentially, to protect opportunities for reptiles and bats in line with the legal protection that they are provided and any local or national Biodiversity Action Plan objectives.

The proposed development will seek to comprehensively address opportunities for habitat creation and management, including:

- The provision of new wetland habitat associated with the sustainable drainage strategy for the site;

- The provision of a net gain in hedgerow resource;

- The future management of retained and created habitats to deliver ecological gain.

The extent of strategic open space proposed and its location on site, means that there is a genuine opportunity to deliver enhanced overall net biodiversity gains as a result of the development proposal.

k) Flood risk from the Battlefield Brook on BROM2 and BROM3 should be addressed through flood management measures to protect and enhance the District's watercourses and enable development appropriate to the flood risk; and surface water run off must be managed to prevent flooding on and around all of the sites through the use of SuDS15. In accordance with the objectives of the Water Framework Directive, development should ideally enhance, or at least not worsen, water quality;

Fluvial Flood Risk

The Environment Agency flood maps show the majority of the site is at low risk of fluvial flooding and is therefore located in Flood Zone 1. In Flood Zone 1 all land uses are acceptable and developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond through the layout and form of the development, and the appropriate application of Sustainable Urban Drainage.

The Environment Agency flood maps also show there is an area of Flood Zone 2 and Flood Zone 3 associated with Battlefield Brook which is contained within the northern part of the site. The majority

of any flooding occurs on the northern side of the watercourse. In line with Environment Agency advice vulnerable development will not be located in areas with a high risk of flooding and appropriate buffers will be maintained along the bank of the watercourse. Detailed flood risk modelling is being undertaken as part of the outline application and Environmental Statement.

Where necessary improvements to any structures/culverts will be provided as part of the development should this be considered necessary to limit flood risk and any new culverts or structures proposed as part of the new development will be carefully designed to satisfy the requirements of the Environment Agency.

Surface Water Drainage

Percolation testing has been completed across the site a mix of infiltration, storage and attenuation measures will be required on site. The topography of the site generally falls to the south although the topography to the north falls towards Battlefield Brook with the topography to the south falling towards the existing residential areas to the east.

The surface water drainage strategy prepared to date shows a series of attenuation ponds will be provided in various locations and serving different land parcels. The drainage strategy has been designed to discharge surface water to existing watercourses which includes Battlefield Brook and an additional unnamed smaller watercourse located to the south.

Discharge rates from the proposed development will be restricted to provide a significant betterment over existing Greenfield run-off rates. The land use framework for the site provides sufficient space for Sustainable Drainage techniques to be incorporated.

l) Sewerage capacity issues will be satisfactorily addressed in Bromsgrove Town through engagement with both Severn Trent Water Ltd and the Environment Agency;

Engagement with Severn Trent Water Ltd and the Environment Agency is taking place to inform the outline application and Environmental Statement and the work to date has indicated that this can be satisfactorily addressed.

m) The developments should seek to incorporate zero or low carbon energy generation technologies e.g Combined heat and power, ground source heat pumps and/or solar power; and

The site's orientation and topography will be used where possible to assist in achieving the delivery of an energy efficient layout. Energy efficient design, including measures such as renewable energy and on-site energy generation, will be incorporated into the scheme in accordance with the Code for Sustainable Homes.

Whilst the overall intentions of criterion this aspect of the policy are supported, this criterion is an unnecessary repetition of policies that are already included elsewhere in the Plan as well as in national planning guidance, and matters relating to energy efficiency and low/zero carbon energy generation are covered by building regulations.

n) Financial contributions for infrastructure provision will be required as detailed in BDP6 Infrastructure Contributions.

This criterion is an unnecessary repetition of Policy BDP6 that is already included elsewhere in the Plan.

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)**

Criterion a) of BDP5A.7 should clarify that affordable housing provision for Perryfields (BROM2) will take account of the recent BDHT affordable housing development.

For BROM2, affordable housing provision includes the recently completed BDHT scheme of 158

affordable homes at Perryfields Road.

Criteria m) and n) are considered unnecessary as they are a repetition of policies that are already included elsewhere in the Plan as well as in national planning guidance, and matters relating to energy efficiency and low/zero carbon energy generation are covered by building regulations. Criterion m) and n) should therefore be deleted from Policy BDP5A.

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


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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 	Date: 7 th November 2013
--	-------------------------------------

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)

Savills

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

Page:	Paragraph:	Policy: BDP6 Infrastructure Contributions
Policies Map:	Other document:	

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

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

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

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

--

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

--

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

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

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

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

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

In establishing the proposed rates for the Community Infrastructure Levy, it will be important to ensure that economic viability is taken into consideration and that there sound evidence in relation to the infrastructure costs included in the charging schedule. Further information is required to fully understand the cumulative impact of all the existing and proposed standards on the implementation of the plan.

In particular it is unclear how requirements for District wide transport improvements have been established and how these will be delivered. Further detail is provided in our letter to the Council dated 8th August 2013, which identified a clear gap in the information about how the methodology which has been outlined in the 'Bromsgrove Development Plan – Transport Network Analysis and Mitigation Report' is translated to the extensive list of highway and sustainability improvements totalling approximately £49m (Appendix D). We are still of the view the evidence base document does not clearly identify how these mitigation measures have been derived and whether they are all required to deliver growth.

In order to avoid double counting, any measures to be provided as site specific improvements directly related to the strategic sites should not form part of CIL. We also feel that more clarity is required on how the measures would be incorporated into any contribution requirement.

In the case of the strategic development sites such as Perryfields, there are significant advantages in securing the necessary infrastructure provision through a section 106 agreement rather than CIL, as this provides a much greater degree of certainty over timing and delivery.

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)**

Policy BDP6 should recognise the need for viability to be taken into account in setting CIL requirements.

Further information is required to understand the level of contributions that will be sought and to avoid double counting.

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


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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 

Date: 7th November 2013

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)

Savills

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

Page:	Paragraph:	Policy: BDP7
Policies Map:	Other document:	

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

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

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

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: <input checked="" type="checkbox"/>	No: <input 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)

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 acceptance that a wider mix of dwelling types will be required on larger sites is supported.

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

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

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

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

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

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)

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature:



Date: 7th November 2013

duplicates
of
57/11

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)

Savills

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

Page:	Paragraph:	Policy: BDP7
Policies Map:	Other document:	

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

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

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

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

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

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

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

The acceptance that a wider mix of dwelling types will be required on larger sites is supported.

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

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

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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 

Date: 7th November 2013

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)

Savills

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

Page:	Paragraph:	Policy: BDP8
Policies Map:	Other document:	

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

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

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

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

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

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

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

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

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

(4) Positively prepared (see Note 7)	<input type="checkbox"/>
--------------------------------------	--------------------------

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

BDP8.1 seeks housing provision of up to 40% affordable housing on greenfield sites or any site accommodating 200 or more dwellings. The Affordable Housing Viability Study undertaken for Bromsgrove District Council by Levvel Ltd highlights the difficulties in securing affordable housing provision of 40% on strategic sites in the current economic conditions. A requirement of 30% would be a more realistic yet ambitious target.

BDP8.2 States that '*In exceptional circumstances where the applicant can fully demonstrate that the required target cannot be achieved the Council may negotiate a lower provision.*' The findings of the Affordable Housing Viability Study indicate that the circumstances where the proposed affordable housing targets cannot be met will not be exceptional. A more flexible approach to viability consideration is therefore required as set out below.

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 single overall target of 30% affordable housing provision would be a more appropriate policy response given the evidence base provided by the Affordable Housing Viability Study.

BDD8.2 should be amended as follows:

'~~In exceptional circumstances~~ Where the applicant can fully demonstrate that the required target cannot be achieved the Council ~~may~~will negotiate a lower provision.

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


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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 	Date: 7 th November 2013
--	-------------------------------------

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)

Savills

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

Page:	Paragraph:	Policy: BDP19
Policies Map:	Other document:	

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

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

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

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

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

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

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

The overall intentions of this policy is supported in principle, however certain aspects of this policy are an unnecessary repetition of other policies within the Plan or national planning guidance. Levels of building sustainability in relation to the Code for Sustainable homes are set nationally by building regulations.

In line with BDP19, the proposed Bromsgrove Town Expansion Site at Perryfields (BROM2) will deliver a high quality design. Further details on the proposed approach and the measures that will be incorporated into the scheme to secure a high quality design are provided in our response to BDP5A and in the *Perryfields – a sustainable urban extension for Bromsgrove* document.

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

Delete criteria c), d) and e).

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	✓

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)

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature: 	Date: 7 th November 2013
--	-------------------------------------

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)

Savills

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

Page:	Paragraph:	Policy: BDP23
Policies Map:	Other document:	

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

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

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

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

--

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

--

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

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

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

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

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

The overall intentions of this policy is supported in principle, however certain aspects of this policy are an unnecessary repetition of other policies within the Plan or national planning guidance. Levels of building sustainability in relation to the Code for Sustainable homes are set nationally by building regulations.

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)

Delete criteria b).

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

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

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

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

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

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature:

[Redacted Signature]

Date: 7th November 2013

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)

Savills

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

Page:	Paragraph:	Policy: BDP24
Policies Map:	Other document:	

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

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

Yes: No:

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

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

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

Yes: No: Do you consider the BDP is **unsound** because it is not:

(1) Justified (see Note 4)	<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)

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)

In line with Policy BDP24, the proposed Bromsgrove Town Expansion Site at Perryfields (BROM2) will incorporate a multi-functional framework of open space, green infrastructure linkages and habitat areas for nature conservation.

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

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

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

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

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

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)

Savills is representing Taylor Wimpey in relation to its strategic landholdings at Perryfields Road, Bromsgrove. Perryfield Road is identified as Bromsgrove Town Expansion Site BROM2, it is the largest of the Town Expansion sites and is critical to the delivery of the Bromsgrove Development Plan.

Signature:

Date: 7th November 2013