

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)

Kevin Cook

1. To which part of the BORLP4 does this representation relate?

| | | |
|---------------|--|----------------------|
| Page: | Paragraph: | Policy: Localism Act |
| Policies Map: | Other document: Statement of Community Involvement | |

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 BORLP4 is legally compliant? (see Note 2)

Yes: No: X

3. Please give details of why you consider the BORLP4 is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Redditch Borough Council has a duty under the Localism Act and its own "Statement of Community Involvement" to consult with Community Stakeholders about its emerging development plans. It states:

1.3.1 The Council is committed to enabling any interested person, group or organisation to become involved in planning within the Borough, regardless of their personal circumstances.

4.4.5 The Borough Council also recognises that certain LDD's may affect specific individuals or interest groups that have not previously been involved in the local planning process and are not contained on the Council's databases. These are known as **Community Stakeholders** and in such cases, the Borough will seek to identify these individuals and organisations and make opportunities available for them to become involved.

To date we are not aware and have not been provided by the Council any contacts with any residents in Mappleborough Green, its elected representatives at Mappleborough Green Parish Council or other community stakeholders in the village of Mappleborough Green.

Representatives from Mappleborough Green Residents Association met planning officers at Redditch Borough Council on the 26th October 2013 to discuss this situation and to investigate why consultation with stakeholders had not been extended to the Parish Council and residents of Mappleborough Green. They were subsequently notified by Council officers that the consultation period for the Parish Council would be extended to the 4th December 2013. **On what grounds does the Council believe that this action is legally justifiable to only one party?**

This is an inappropriate response in order to try and justify/mitigate the Council's total failure to comply with the requirements of its "Statement of Community Involvement" and its Statutory obligation to carry out consultation with those local communities directly affected by its proposals in the "emerging Local Plan No.4"

We therefore consider that the Council has no legal justification to proceed with the existing timetable for consultation on its emerging local plan no.4. and that its stated consultation process and timetable is unlawful.

4. Please set out what change(s) you consider necessary to make the BORLP4 legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BORLP4 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)**

The Council should discontinue with its current timetable and consultation process and ensure that it has complied with the relevant Acts on Localism and its duty to consult with Community Stakeholders.

The Council on satisfying these requirements should then seek to introduce a new timetable for consultation that fully reflects that it has not involved or provided any of its stated policies on delivering information, workshops, public meetings or presentations to Community Stakeholders in Mappleborough Green, only once this has been provided will the Council be able to demonstrate that it has satisfied the requirements of its own consultation policies and is in accordance with the legal requirements of the Town and Country Planning Act.

5. Do you consider the BORLP4 is sound? **(see Note 3)**

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|------|-----|
| Yes: | No: |
|------|-----|

Do you consider the BORLP4 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 BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

7. Please set out what change(s) you consider necessary to make the BORLP4 sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BORLP4 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)**

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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.**

| | |
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| 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)

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| Signature:  | Date: 7 th November 2013 |
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Name or Organisation (see Note 8 para 4.1)

Kevin Cook

1. To which part of the BORLP4 does this representation relate?

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|---------------|---|---------|
| Page: | Paragraph: | Policy: |
| Policies Map: | Other document: Review of the A435 ADR and Adjoining Land | |

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 BORLP4 is legally compliant? (see Note 2)

Yes: No:

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5. Do you consider the BORLP4 is sound? (see Note 3)

Yes: No: X

Do you consider the BORLP4 is **unsound** because it is not:

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

6. Please give details of why you consider the BORLP4 is unsound. Please be as precise as possible. If you wish to support the soundness of the BORLP4, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

Contained within the document "Review of the A435 ADR and Adjoining Land" there is a plan that relates to development area 3. Within this suggested plan there is a site known as Broadacres Farm upon which it is suggested it could be used for "Limited residential development".

It is described in the document to be of a lower density than areas 1 and 2 due to its close proximity to the village of Mappleborough Green. This can be interpreted to be a measure to try to mitigate the impact on Mappleborough Green as the review states that: " The separate identity of Mappleborough Green should not be compromised. Suitable buffering will be required between proposed development and the existing settlement of Mappleborough Green".

Whilst this may be possible to achieve around a small residential development, it is a completely different matter when it comes to protecting that identity on a potential industrial development site that is immediately adjacent to the Broadacres farm site and stretches along the A435 adjacent to residential settlement on the eastern side of the A435. This proposal does not seem to be at all coherent across the proposed uses as the potential impacts could be very significant.

Furthermore; Worcestershire County highways has stated that any access to the proposed development of the Broadacres Farm site should be via the A435. This stretch of highway on a series of S bends is notorious for accidents, some fatal, which cannot have been taken into consideration properly by the highways Authority and therefore makes this proposal unsound on two counts:

One: the impacts on the settlement of Mappleborough Green from low density housing and directly adjacent employment uses on 7.78ha are totally incompatible and not sound in there assertion.

Two: access onto the A435 for any development in this area is likely to exacerbate already well known problems of safety on that stretch of road, and has not been properly modelled.

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That an alternative site be considered to achieve the growth requirements in less sensitive areas. With particular reference to the 7.78ha of employment land that could be accommodated elsewhere using existing sites that could have been considered under the duty to cooperate with adjoining authorities.

In order to accommodate Redditch's employment growth needs sites have been identified within Bromsgrove and Stratford on Avon districts. They are namely the Ravensbank ADR and the Winyates Green Triangle.

The need for development for employment growth identified within the A435 ADR could have been accommodated to the North of the existing Ravensbank development with access being available

from Acanthus Road, similar to that proposed from Hedra road into the Ravensbank ADR. I attach a plan of an alternative site (hatched in blue) that could easily accommodate the 7.78ha of employment land proposed in the A435 ADR.

I consider this plan to be unsound because this site has not been properly considered. Although it lies within the Green belt this is not a sufficient reason to discount it without considering the following points:

Study into the future growth implications of Redditch – Second Stage Report (WYG 2, January 2009)

This study reviewed both land within Redditch Borough boundaries and land adjacent to Redditch within Bromsgrove and Stratford-on-Avon Districts in order to identify a preferred location for cross-boundary development to meet the development targets set for Redditch. The study concluded that the three ADRs within Redditch were less preferable for development than some Green Belt land adjacent to Redditch but located in Bromsgrove district. These findings therefore identified more of Redditch's development to be accommodated in Bromsgrove District than prescribed in the WMRSS Phase Two review. However, as detailed in the introduction to this document, this argument was not accepted by the RSS Inspectors; in order to meet the development targets prescribed in the Panel Report, it is necessary to utilise the three ADRs in Redditch Borough.

The Government has revoked all RSS which could have provided the opportunity for Redditch to explore this option with Bromsgrove as the RSS panel report could have been re-visited but was chosen not to be.

Furthermore national Planning Policy requires Development Plans to be able to deal with changing circumstances: *"Plans should be able to show how they will handle contingencies: it may not always be possible to have maximum certainty about the deliverability of the strategy. In these cases the core strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use. Authorities should not necessarily rely on a review of the plan as a means of handling uncertainty."* (PPS12 para 4.46)

The development of this site would have no impact on any residential development.

The site is extremely well served for public transport and main highway network access.

Existing infrastructure for employment uses B1, B2, B8 are very well provided, which would reduce costs to developers and local authorities.

It would mitigate entirely the additional load onto the A435 in sensitive areas already suffering from the de-trunkation of the A435 and the removal of the bypass scheme.

The use of this site would also remove the possible contention of boundary issues as Redditch consider the district and County boundary along the A435 ADR to be "arbitrary" in relation to development along the A435 ADR which may not be supported by Stratford upon Avon DC.

Stratford DC have not declared any of the land designated as white land within its district boundary along the A435 ADR for development in its own development plan as yet.

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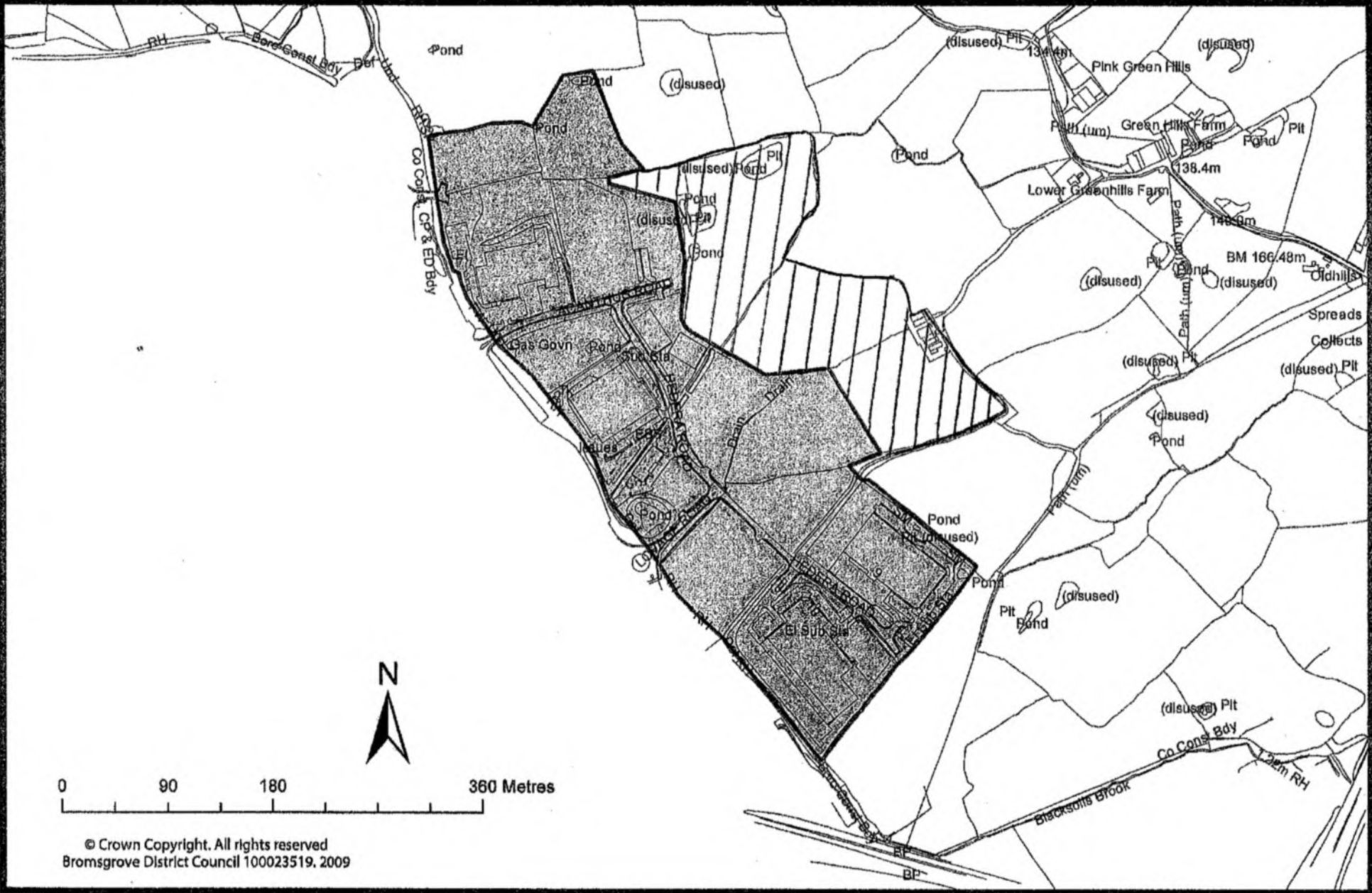
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| Signature:  | Date: 7 th November 2013 |
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Ravensbank Business Park



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