

Our Ref: PF/LS/PF/8762
(Please reply to Banbury office)

11 November 2013

Strategic Planning
Planning and Regeneration
Bromsgrove District Council
Burcot Lane
Bromsgrove
Worcs.
B60 1AA

(by email strategicplanning@bromsgrove.gov.uk)

Dear Sirs

**SUBMISSION TO THE BROMSGROVE DISTRICT COUNCIL PROPOSED
SUBMISSION DOCUMENT
LAND ADJOINING 25 AND REAR OF 47 ST GODWALDS ROAD, FINSTALL
BROMSGROVE**

I enclose representations to the Draft District Plan. These representations are submitted in the form of a single document upon which I have responded to those policies which it is considered to be of relevance to the matters of concern to our client who has land interests in the Borough.

I have included:

- the representations forms;
- a submission report prepared by Framptons; and
- a red line plan identifying the site to which the representation relate.

I look forward to acknowledge of receipt of these representations.

If you have any queries, please contact Louise Steele at Framptons.

Yours faithfully,





Oriel House 42 North Bar Banbury Oxfordshire OX16 0TH Tel: 01295 672310 Fax: 01295 275606

Aylesford House 72 Clarendon Street Leamington Spa Warwickshire CV32 4PE Tel: 01926 831144 Fax: 01926 882939

www.framptons-planning.com

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TOWN AND COUNTRY PLANNING ACT 1990

**SUBMISSION IN RESPONSE TO THE
BROMSGROVE DISTRICT PLAN PROPOSED
SUBMISSION VERSION 2011 - 2030**

**ON LAND ADJOINING 25 AND REAR OF 47
ST GODWALDS ROAD, FINSTALL,
BROMSGROVE**

NOVEMBER 2013

REF: PIP02/PF/8762



1.0 INTRODUCTION

1.1 The owners (the Reynolds family) own the land edged red as shown on the plan attached.

1.2 The owners have participated at previous stage (the Town Centre Area Action Plan) but not at the the Issues and Options Consultation (2005 and 2007); Draft Core Strategy Consultation (2008 and 2011); and Housing Growth Consultation (2013).

1.3 It has been envisaged that the allocation of the land will:

- assist the District's housing need;
- deliver affordable housing;
- improve accessibility and linkages to Finstall/Bromsgrove.

1.4 The Bromsgrove District Plan Proposed Submission Version (November 2013) fails to achieve the above aims. The evidence suggests that the recommended policies fail to adequately respond to the finding of key evidence documentation such as the Strategic Housing Land Availability Assessment (SHLAA) (July 2013) and the Worcestershire Strategic Housing Market Assessment (SHMA) (February 2012). Therefore it is submitted that the documents are not sound. The deficiency in soundness derives from major deficiencies in the evidence base as to the deliverability of key and essential aspects of the plan.

1.5 It is demonstrated through these submissions how the Bromsgrove District Plan Proposed Submission Version could be made sound. It is acknowledged that the submission advocates for the release of land from the Green Belt. In the balance of planning considerations it is submitted the planning advantage lies firmly in releasing land controlled by the owners to enable a comprehensive planned development to achieve and deliver new housing.

2.0 THE ROLE OF THE LOCAL PLAN

2.1 The purpose of the planning system is to contribute to the achievement of sustainable development (National Planning Policy Framework 2012 (NPPF) paragraph 6). For plan making this means that local planning authorities should positively seek opportunities to meet the development needs of the area. Local plans should meet objectively assessed need, with sufficiently flexibility to adapt to rapid change (NPPF paragraph 14).

2.2 One of the core objectives of the NPPF, as set out in paragraph 47, is to *“boost significantly the supply of housing..”*

2.3 In order to achieve this aim, Local Planning Authorities should: *“Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent*



with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.”

- 2.4 The core land-use planning principles require the planning system to ‘proactively’ drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local communities the country needs. As stated in the NPPF (paragraph 17): *“every effort should be made objectively to identify and meet the housing business and other development needs to the area, and respond positively to wider opportunities for growth.”* Plans therefore should take account of market signals and set out a clear strategy for allocating sufficient land which is suitable for development in their area (NPPF paragraph 17).
- 2.5 Furthermore, the NPPF requires Local Planning Authorities to *“ensure that the Local Plan is based on adequate up-to-date evidence and relevant evidence about the economic, social and environmental characteristics and prospects of the area.”*
- 2.6 Our clients wish to ensure that the Draft District Plan fully responds to these principles in the interests of securing a sustainable future for the District. Our clients are concerned that the overarching vision of the Proposed Submission document inadequately makes reference to the provision of development needs that the District requires during the plan period. It is considered that the required



development needs derived from objective assessment can be provided while maintaining and enhancing the heritage and green environment of the District.

- 2.7 On this basis, it is considered that the Draft District Plan fails the tests of soundness identified at paragraph 182 of the NPPF. The plan has not been '*positively prepared*' as it does not meet objectively assessed development requirement. The Plan specifically some of its key objectives are also not deliverable and therefore the strategy fails the tests of needing to be '*effective*'.

Housing Need in the District

- 2.8 The District Draft Plan do not meet the full, objectively assessed needs for market and affordable housing in the housing market area as required by paragraph 47 of the NPPF.
- 2.9 With regard to housing needs, paragraph 159 of the NPPF sets out that Strategic Housing Market Assessments should assess housing requirements based on household and population projections and cater for housing demand and the scale of housing supply necessary to meet it. Importantly, paragraph 173 states that "*Plans should be deliverable*".
- 2.10 Draft policy BDP3 states that the over the Plan period of 2011 to 2030 the Plan will target the delivery 7,000 new dwellings (368 dwellings per annum (dpa)) and 28



hectares of land for employment development to meet a range of types and sizes of site.

2.11 The proposed housing requirement is considered unsound as it is not justified by the evidence or positively prepared.

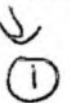
2.12 As part of the evidence base informing the emerging Draft District Plan the Partnership Authorities commissioned GVA Grimley to prepare the South Worcestershire Housing Market Assessment ("SHMA"). The SHMA was published February 2012 and presents 5 Core Scenarios (Scenario 1: 2008-based ONS projections; Scenario 2: natural change; Scenario 3: migration-led; Scenario 4: employment-constrained; and Scenario 5: dwellings-led). For Bromsgrove this results in a housing growth ranging from 108 (scenario 2) dwellings per annum (dpa) to 380 dpa (scenario 4) over the period 2006 to 2030.

2.13 The 2011 Office of National Statistics ("ONS") Census results (first release) – published after the publication of the SHMA – indicate that an additional 4,297 people were living in the South Worcestershire area at the time of the census (March 2011) compared to the 2010-mid year population estimate. The 2010 estimated total population of the South Worcestershire area was 286,046, whereas the 2011 Census records indicated that some 290,343 people were living in the area. The most up-to-date evidence reveals that the number of people living in the South



Worcestershire sub-region is circa. 4,000 below the 2010-mid year population estimates. Crucially, this translates into a requirement for additional housing in the order of circa. 1,667 dwellings (4,000 / 2.4). The above mentioned Core Scenario 3 has been used as the basis for the District Plan target dpa, and this uses the 2009 ONS mid year estimates. It is submitted that the most up-to-date 2011 Census evidence should be acknowledged within the Draft District Plan.

2.12 - 2.17



- 2.14 The fact that the 2011 Census data has not been taken into account means that the Draft District Plan has not been prepared on a strategy which seeks to meet the true extent of the objectively assessed development needs for the South Worcestershire sub-region. The Draft District Plan in its current form is not sound- it fails to provide adequate levels of housing growth for the identified plan period.

- 2.15 Furthermore, in the past 3 years (2010/11, 2011/12, 2012/13) the Borough has delivered only 508 dwellings (as set out in the Tables (not referenced) on page 16 of the Bromsgrove Strategic Housing Land Availability Assessment (July 2013) which shows the target of 368 dpa is not being reached. This equates to a completion rate of 169 dpa, which is some way off the target of 1104 units which should have been delivered if the target of 368 dpa is considered to be credible.

- 2.16 The clear Government priority is for housing delivery to significantly boost the supply of housing including affordable units and that previous delivery rates should



not be used to constrain future requirements. This leaves the Borough already 596 dwellings short of their target for housing delivery early in the plan period.

2.17 Therefore, for the reasons set out above, the proposed plan requirement for 7,000 net dwellings is set too low.

Affordable Housing

2.18 Draft Policy BDP8 (Affordable Housing) indicates at paragraph 8.101 that the need for affordable dwellings for each year over the net five years is 219 dwelling per annum (dpa) Of note there is no reference to the need across the plan period. (3)

2.19 Additional land should be identified which will enable a higher proportion of needed affordable housing to be delivered.

Windfall Sites

2.20 The Strategic Housing Land Availability Assessment (SHLAA) (2013) making an allowance for small sites of 30 dwellings per annum and this source of supply has been factored in for the final 16 years of the plan period to avoid double counting with planning permissions. Therefore there is a strong reliance on small sites 30 dpa for 30 years (480 units over 16 years), which is the equivalent of 6.8 % of the 7,000 new dwellings target.

2.21 The reliance on windfall sites would appear to be contrary to recent advice issued by central government on the National Planning Practice guidance; concerning reliance on windfall amounts. This advice states *“Plan makers should not need to rely on windfall allowance in years 6-15. This is because local planning authorities have the ability to identify board locations on years 6-15, following a degree of flexibility to meet development needs where specific sites cannot be identified.”*

Green Belt Review

2.22 Policy BDP4 (Green Belt) states at paragraph 8.28 that the *“NPPF requires Green belt boundaries to be capable of enduring beyond the plan period and can only be altered in exceptional circumstances of through the preparation or review of the Local Plan. In view of the urgency to have an adopted up to date District Plan, the Council is progressing a plan that identifies sufficient land to deliver 4,600 of the 7,000 requirement by approximately 2023, a Green Belt review will then be undertaken which will remove sufficient land from the Green Belt to deliver the remaining 2,400 homes to the period 2023-2030 and address the longer term development needs of Bromsgrove District and adjacent authorities based on the evidence at the time.”*

2.23 This approach is entirely contrary to the NPPF which states at paragraph 47 that to boost significantly the supply of housing, local planning authorities should: *“use*



their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying keys sites which are critical to the delivery of the housing strategy over the plan period.” [added emphasis] The Proposed Submission Version completely fails to do this as it does not meet the **full need** over the plan period, namely it is 2,400 dwellings short of the target and only plans for dwellings up to year 2023.

2.24 It should be for the local planning authority to show how the need will be met through the Plan. This point was recently considered at the Examination of the South Worcestershire Development Plan, paragraph 57 of the Inspector’s Interim conclusions on the Stage 1 matters (28 October 2011) states that it is not appropriate to rely on a later review of the Plan to meet part of the identified need.

2.25 This approach is also entirely contrary to the NPPF which states at paragraph 47 83 that *“Local planning authorities with Green Belt area should establish Green Belt boundaries in their Local Plan which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances through the preparation or review of the Local Plan.”* [added emphasis]. It is clear therefore that the Proposed Submission Version should at this stage include a review of the Green Belt boundaries, this is required at this stage to meet the need for housing.



Cross Boundary Requirements

2.26 The Proposed Submission Version also fails to adequately take into account of Cross borough requirements Policy BDP4 (Green Belts) states:

“BDP4.2 A Local Plan Review including a full Review of the Green Belt will be undertaken in advance of 2023 to identify:

a) Sufficient land in sustainable locations to deliver approximately 2,400 homes in the period 2023-2030 to deliver the objectively assessed housing requirement for Bromsgrove District.

b) Safeguarded land for the period 2030-40 to meet the development needs of Bromsgrove and adjacent authorities based on the latest evidence ; and

c) Land to help deliver the objectively assessed housing requirements of the West Midlands conurbation within the current plan period i.e. up to 2030.”

2.27 The draft Local Plan therefore fails to adequately examine provision for the District to engage with Birmingham City Council concerning meeting Birmingham’s future housing need. The undertaking of an SHMA, confined to Worcestershire authorities, has not properly worked with neighbouring authorities where housing market areas cross administrative boundaries. Of particular relevance to Bromsgrove is Birmingham.

2.28 The anticipated and significant need for the Birmingham conurbation is well documented in the Birmingham City Council SHMA 2012. Under the heading



'constrained supply' it is stated at para 11.49: "*[BUT] in reality, as we shall see, other planning authorities in the sub-regional housing market area are not planning to provide the necessary land. If they do not, some of the adjustment may still happen through migration, as more people move out of the sub-region and / or fewer people move in. But it is likely that the shortage of housing land would also impact on household formation.*"

2.29 Birmingham City Council (BCC) has stated in the document 'Planning for Birmingham's Growing Population October 2012' that there is a need to plan for around 80,000 new homes in the period between 2011 and 2031.

2.30 The SHMA 2012 for BCC, revised January 2013, identifies an estimated supply shortfall across the housing market area of some 2,000 net new homes per year for the plan period 2011 – 2031 (prior to a Green Belt review - SHMA Para 13.5). Paragraphs 13.7 – 13.8 state: "*Any increase in capacity will reduce the sub-regional supply shortfall estimated earlier. But we expect that a substantial shortfall will remain, because there are limits to the amount of land Birmingham can release consistent with the sustainability principles of the NPPF, and there are also limits to what can be realistically developed by the market within the city's boundaries. Therefore, to meet demand and need in accordance with the Framework in the long term, there should also be a joint study involving Birmingham and adjoining authorities to identify the scale of additional housing provision that should be*



planned for outside Birmingham and to agree a strategy for delivering this. In due course the results of this study should be reflected in individual Development Plans." (emphasis added)

2.31 In view of the geographical relationship of the Draft District Plan area in Birmingham, well served by road/rail corridor and long established socio-economic links, it is almost inevitable that Bromsgrove should, acting responsibly within its duty co-operate to ensure the Local Plan is effective and positively prepared, provide some element of housing provision to meet the needs which cannot be met by Birmingham.. The Proposed Submission Version therefore fails to take adequate account of unmet housing need of the West Midland conurbation up to 2030.

Changes Considered Necessary

2.32 As set out above, the Draft District Plan does not adequately demonstrate why it has not proposed a higher target delivery for dwellings.

2.33 The plan should make provision for additional housing in Bromsgrove, The justification is outlined in previous sections of this statement can be summarised as follows:

- up to date census data indicates additional housing will be required., up to date ONS data should be used;



- Bromsgrove has a record of previous under delivery and effectively has a backlog to catch up on early on in the plan period;
- additional housing in Bromsgrove could help the Birmingham conurbation meet its needs;
- affordable housing need is significant and the Local Plan needs to plan positively to significantly boost supply;
- there is an over reliance on windfall rates currently identified; and
- by committing to a Green Belt review in 2023, there is a chance decision making will be delayed in the first 10 years due to local authorities having a delay mechanism in place. The Green Belt must be reviewed as part of the current consultation.

2.34 The Local Plan should respond to the Government's agenda to create conditions for economic growth over the 19 year period (2011 to 2030). A fundamental requirement of the spatial planning system to provide sufficient land to meet development needs to accommodate potential – and sought after – economic growth. The allocation of suitable land to meet potential household growth will lead to delivery. A risk to economic growth is the undersupply of land to meet housing needs.

2.35 In summary, the figure of 7,000 houses must be considered very modest and well below that which a recovering economy and less fettered housing market as well as

2.22 - 2.35 = ②

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being contrary to the NPPF which seeks to significantly boost housing delivery. Emerging advice and policy would suggest that the Local Plan is failing to meet the challenges set by household increases, pent up demand, the NPPF, the need for affordable housing and population increases.

3.0 THE MERITS OF THE SUBJECT SITE

- 3.1 It is submitted that the release of the land is necessary in order to deliver sufficient housing with the District.
- 3.2 The area of land proposed for release from the Green Belt is shown on the plan attached. The land is available, suitable and achievable for housing to form a sustainable development as advocated by the NPPF.
- 3.3 The land is located on the eastern side of St Godwalds Road to the rear of a row of existing properties.
- 3.4 The site comprises the southern portion of a larger site that has been identified in the SHLAA (July 2013) as a Green Belt Potential Site (BCD79).
- 3.5 The site is in family ownership. It would therefore be well positioned to contribute to developer contributions that are proven to be necessary to offset the impact of development.



- 3.6 The site is well related to the existing small settlement area of Bromsgrove. The is located on the eastern side of St Godwalds Road Lane to the rear of existing properties that front onto the road. At present the site is used for the storage of agricultural implements and contactors equipment. There are a number of informal unattractive buildings on the site. The site can be developed in a viable manner; it does not have significant development costs associated with it such as contamination or noise mitigation.
- 3.7 The site is located within the designated Green Belt, however it is in a highly sustainable location being only 250 metres from Bromsgrove Station and less than 400 metres from the services and facilities of Fininstall. It is also located close to three schools (South Bromsgrove Community School, Rigby Hall School and Aston Field Middle School) and two parks (Aston Fields and Fininstall park), and located close to the Bromsgrove Cricket, hockey and tennis club.
- 3.8 The site is well defined with strong defensible boundaries and abuts existing development along St Godwalds Road.
- 3.9 The site is not within or adjacent to conservation area and does not contain any listed building. There are no other statutory designations associated with this site.
- 3.10 Overall it is considered that the site is considered to be in a sustainable location within a number of facilities within a reasonable walking distance.

- 3.11 It is envisaged that the site could forward for a modest residential development to meet the stated objective of supplying significant housing. New linkages could be created to integrate the proposal into the settlement, which will have a knock on impact of making the settlement more sustainable.
- 3.12 It is submitted that the need to identify additional land for housing development in a sustainable locations amounts to 'exceptional circumstances' that justify the release of this land form the Green Belt (NPPF paragraphs 83, 87 and 88). The site is sustainable in terms of its access to the local centre services and other indicators of sustainability.
- 3.13 The five purposes of the Green Belt are:-
- to check the unrestricted sprawl of large built up areas;
 - to prevent neighboring town from merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration by encouraging the recycling of derelict and other urban land (NPPF paragraph 80).
- 3.14 The release of land of the Green Belt will not lead to the unrestrictive sprawl of a large built up area. The development of the site land will not adversely impact upon the setting of Bromsgrove.

3.15 It is acknowledged that the release of land would necessarily result in the encroachment of hitherto undeveloped countryside that is in agricultural use. However, the site is currently used the storage of agricultural implements and contactors equipment. There are a number of informal unattractive buildings on the site. The development of the site would improve the visual amenity of the area. By allocating the site a defensible long term barrier will be created to the east and south, to complement the transition from settlement to Green Belt and open countryside which will result in a viable development.

3.16 One consideration in the context of this land is whether development at the site would cause neighbouring towns to merge into one another. It is submitted that in reality the release of the site would not result in the actuality or in perception that settlements would merge. There would remain a clear open tract of land to east and south, creating a defensible boundary.

3.17 In conclusion, it is submitted that the release of the land would not harm the underlying purposes of the Green Belt, other than resulting in the encroachment into the existing countryside, this impact is however outweighed by the need to identify more land for housing to meet the needs of the District.

4.0 Conclusions

4.1 It has been envisaged that the delivery of housing and its associated infrastructure to support future growth within the District would be achieved by the comprehensive allocation of the site, for new development particularly housing that is:

- necessary to provide housing that is needed within the local housing market;
- of sufficient scale to secure the delivery of new infrastructure including open space, and upgraded linkages;
- housing that can be viably constructed at an appropriate density to safeguard the setting of the settlement;
- development which can increase access to the existing settlement;
- development which can increase public access to the open countryside through the formation of significant areas of open space.

4.2 It is submitted that the Core Strategy fails the tests of soundness as set out at para 182 of NPPF. Framptons would be pleased to discuss any aspect of the above representations with you to clarify any points of detail. Framptons would welcome on behalf of our client the opportunity to be involved in the oral part of the Examination into the Draft District Plan.

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)

FRAMPTONS

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: 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)

PLEASE SEE ATTACHED SUBMISSION

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)

PLEASE SEE ATTACHED SUBMISSION

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 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 checked="" type="checkbox"/>

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

PLEASE SEE ATTACHED SUBMISSION

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)

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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.

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)

AS THIS ISSUES RAISED ARE COMPLEX .

Signature: 	Date: 11/11/13
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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)

EXEMPTIONS

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

Page:	Paragraph:	Policy: SDP3
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)

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PLEASE SEE ATTACHED SUBMISSION

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 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 checked="" type="checkbox"/>

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

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Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

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AS THE ISSUES RAISED ARE COMPLEX .

Signature:  Date: 11/11/13 .

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)

EXEMPTIONS

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

Page:	Paragraph:	Policy: BDP 4.
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)

PLEASE SEE ATTACHED SUBMISSION

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)

PLEASE SEE ATTACHED SUBMISSION

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 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 checked="" type="checkbox"/>

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

PLEASE SEE ATTACHED SUBMISSION.

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 SEE ATTACHED SUBMISSION

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.

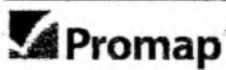
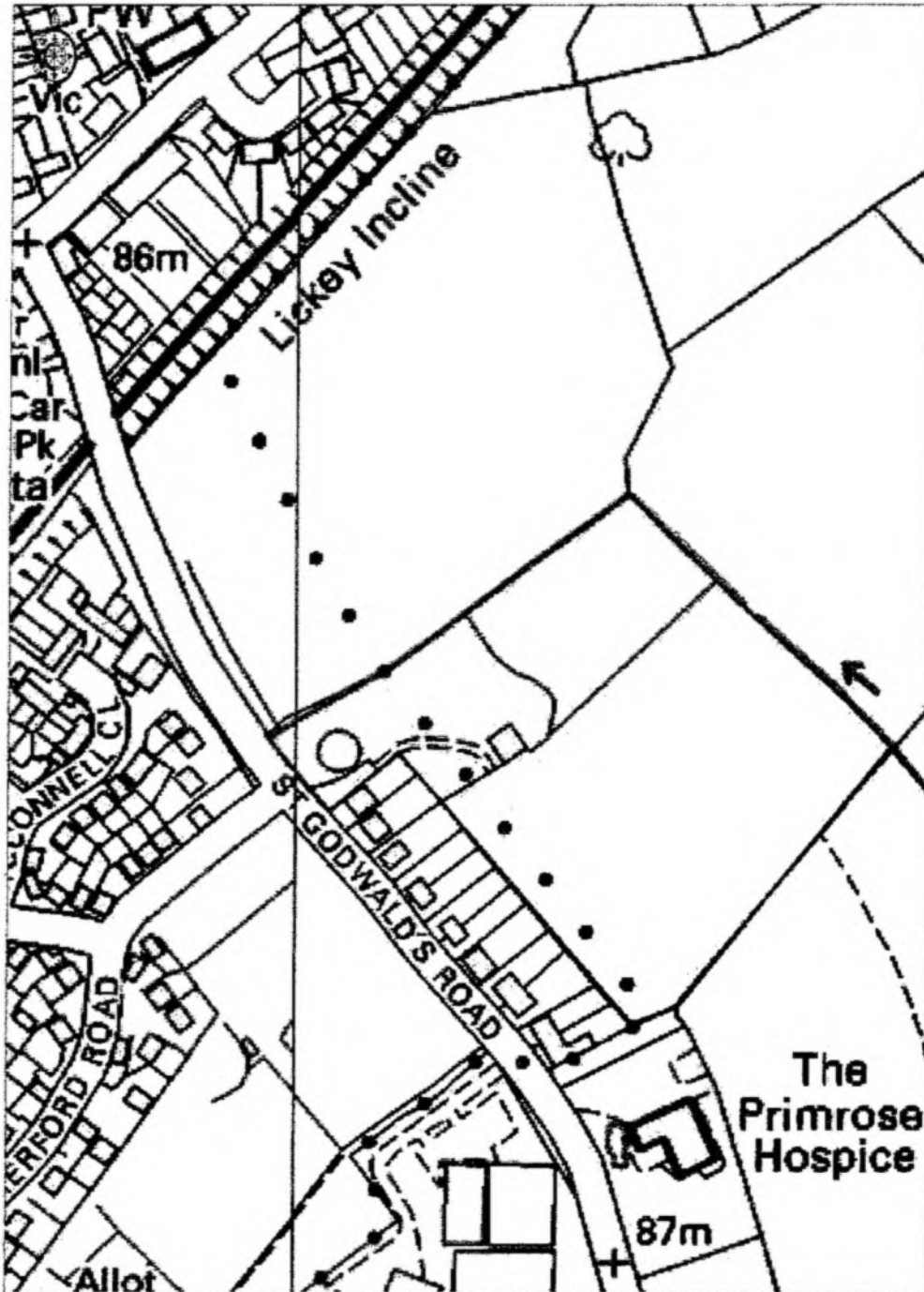
No, I do not wish to participate at the oral examination	<input type="checkbox"/>
Yes, I wish to participate at the oral examination	<input checked="" type="checkbox"/>

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)

AS THE ISSUES RAISED ARE COMPLEX.

Signature:  Date: 11/11/13

Godwalds Road Red Line Plan



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