

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)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: Whole Plan	Paragraph:	Policy:
Policies Map:	Other document:	

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

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

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

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

Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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 use of paragraph numbering throughout is commended.

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

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 4	Paragraph: 1.13-1.16 Duty to Co-operate	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.

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(2) Effective (see Note 5)	<input checked="" type="checkbox"/>
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(4) Positively prepared (see Note 7)	<input type="checkbox"/>

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There should be a commitment to review the Plan to deal with Birmingham related development if required. The approach should be similar to that proposed for Redditch Borough and recognise that the cross-boundary implications for Redditch to meet Birmingham's unmet needs within the wider GBSLEP area is likely to have local cross-boundary implications for Bromsgrove District as well as the direct relationship between Birmingham and Bromsgrove District.

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)

Paragraph 1.15 should be more explicit about the outcome of the cross-boundary joint working between Bromsgrove and Redditch Councils in respect of the need for strategic site allocations to meet Redditch-related development needs in Bromsgrove District on the edge of the Redditch urban area.

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

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This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

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)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 11	Paragraph: 3 Key Challenges	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)

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

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

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There is a need for the key challenges to refer to meeting cross-boundary needs relating to Redditch in the plan period and beyond.

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)

There is a need for the key challenges to refer to meeting cross-boundary needs relating to Redditch in the plan period and beyond.

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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)

This does not require oral evidence.

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)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 12-13	Paragraph: 4 Vision	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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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5. Do you consider the BDP is sound? (see Note 3)

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The Vision should also recognise the need to work collaboratively with Redditch Borough Council to ensure the development needs of this neighbouring authority are addressed sustainably.

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The Vision should also recognise the need to work collaboratively with Redditch Borough Council to ensure the development needs of this neighbouring authority are addressed sustainably.

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This does not require oral evidence.

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)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 15	Paragraph: 7 Key Diagram	Policy:
Policies Map:	Other document:	

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

Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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<p>1. The Key Diagram should address the issue of strategic Areas of Development Restraint for potential developments beyond the Plan Period as required by NPPF paragraphs 83 to 85. Land west of the Brockhill East Strategic Site bounded by Weights Lane and Butlers Hill Wood to the north and Cladshill Wood to the west is considered suitable as an ADR to address potential further development needs related to Redditch, recognising that the principle of Redditch's needs being met on a cross-boundary basis has been accepted through the Proposed Submission Version of the Bromsgrove District Plan.</p> <p>2. The identified area of the Brockhill East Strategic Site within Bromsgrove District has a capacity of about 700dw taking account of the assessed constraints. This justifies amending the indicated site capacity from 600 to 700 dwellings. In the event of</p>
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the need to compensate for undeliverable housing capacity at Foxlydiate in the Plan period to 2030, having regard also to the suitability of allocating land at Brockhill West for development, consideration should be given to extending the western boundary of the allocated Brockhill East strategic site to include additional land. There a clear and defensible boundary adjacent to the fishing ponds which is a suitable alternative to ensure the delivery of at additional dwellings in this location. In this scenario, the extent of the ADR land referred to at (1) above can be adjusted to be contiguous with the boundary of the allocated site.

3. Miller Strategic Land, Southern & Regional Developments and Persimmon Homes object to the omission of a Strategic Site at Brockhill West (see separate joint representation with Miller Strategic Land and Southern & Regional Developments) for up to some 1,100 dwellings including about 900 dwellings in Bromsgrove District. Brockhill West is an entirely appropriate location for cross-boundary residential development. The part in Redditch Borough was recently identified as part of the Borough's 5 Year Land Supply despite being within the Green Belt. The Brockhill West land is a suitable and deliverable alternative to the inappropriate extent of the Foxlydiate Strategic Site proposal of 2,800 dwellings which is concluded to conflict with Green Belt policy in the NPPF and is concluded not to be capable of full delivery by 2030. The evidence presented on heritage grounds for excluding land at Brockhill West has been rebutted in previous submissions and is concluded to be an unsound basis for rejecting an otherwise most appropriate option in terms of sustainability appraisal. In terms of housing trajectory delivery, land at Brockhill West in Bromsgrove District is capable of early release in parallel with on-going development at Brockhill East in Redditch Borough, where the Bromsgrove part of the strategic site is expected to follow later in the plan period.

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)

Brockhill West should be added as a strategic site; an ADR should be shown at Brockhill north of Brockhill West and west of the 'Brockhill' Strategic Site (Site 2); and the Foxlydiate Strategic Site should be reduced in extent so it does not extend south of Cur Lane and the western boundary is as shown on the plan at Appendix 3 in the separate report accompanying duly made representations on behalf of Miller, SRD and Persimmon.

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This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

Signature

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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)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 19	Paragraph:	Policy: BDP2 Settlement Hierarchy
Policies Map:	Other document:	

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The policy fails to refer to meeting Redditch related housing needs on a cross-boundary basis in the first list of locations from BDP2.1- 2.4. There should be a cross-reference to Policy RCBD1.1 Redditch Cross Boundary Development.

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There should be a cross-reference to Policy RCBD1.1 Redditch Cross Boundary Development.

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This does not require oral evidence as it relates to appropriate cross-referencing and internal consistency.

Signature		Date: 11.11.13
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Part B (see Note 1 and Note 8 para 4.2)

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Name or Organisation (see Note 8 para 4.1)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page:21-22	Paragraph: 8.18-8.24	Policy: BDP3 Future Housing and Employment Growth
Policies Map:	Other document:	

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The Plan states clearly that the objectively assessed need to meet Bromsgrove District's housing requirement is just below 7,000 dwellings in the plan period between 2011 and 2030. This excludes cross-boundary provision at Redditch. The Plan however has failed to demonstrate how the full objectively assessed needs will be delivered through identified sources of supply, such that there will be a shortfall of some 2,400 dwellings which will be dependent upon a future review of the Plan in turn dependent on a Green Belt review exercise. This is concluded to be at odds with the NPPF which requires at paragraph 47 bullet

1 that sites which are critical to the delivery of the housing strategy (i.e. to deliver 7,000 homes by 2030) are identified in the Plan. It is considered unsound to defer decisions on some 34% of the required housing delivery in a Plan period to a review of the plan. In separate representations, Persimmon Homes with Miller Strategic Land and Southern Regional Developments identify the comparative merits of land at Brockhill West contributing up to some 900 dwellings on the edge of Redditch within Bromsgrove District, contributing towards the identified overall requirement for Redditch Borough. The principle of addressing Birmingham related growth through a plan review is accepted as the evidence base for Bromsgrove's potential share of unmet future need in Birmingham has not yet been identified and the approach can be same for Bromsgrove as other 'shire districts' around Birmingham (for example Lichfield in the same GBSLEP area) where Local Plan Examination inspectors have accepted that an early review will be appropriate.

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The comparative merits of land at Brockhill West contributing up to some 900 dwellings on the edge of Redditch within Bromsgrove District, contributing towards the identified overall requirement for Redditch Borough should be identified. Brockhill West should be a Strategic Site in the plan.

A new policy allocating the site is required.

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

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

Name or Organisation (see Note 8 para 4.1)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 22	Paragraph: 8.25	Policy: BDP3
Policies Map:	Other document:	

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

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

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

Miller, SRD and Persimmon support the recognition of the need for collaborative joint cross-boundary working between Redditch Borough and Bromsgrove District Councils to address the needs of Redditch Borough as identified in paragraph 8.25 and the right column of the table in Policy BDP3.

Land at Brockhill East can contribute effectively some 700 dwellings towards the delivery of required homes in Bromsgrove District on the edge of Redditch.

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.

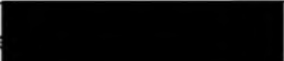
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No, I do not wish to participate at the oral examination	<input checked="" type="checkbox"/>
Yes, I wish to participate at the oral examination	<input type="checkbox"/>

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

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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)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 23-25	Paragraph:	Policy: BDP4 Green Belt
Policies Map:	Other document:	

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

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

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

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

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

The Bromsgrove District Plan should not be dependent upon a future Green Belt Review to deliver the District's housing requirement. It is noted that a Green Belt review has been undertaken for peripheral growth at Redditch to meet fully identified needs in the period to 2030 which is commended. However, under NPPF paragraphs 83 to 85 regard must be given to future potential development needs such that boundaries do not need to be reviewed again at the end of the plan period. It is noted that the District Council intends to identify safeguarded land (or Areas of Development Restraint (ADRs)) for Bromsgrove District's needs as part of the Green Belt Review process. It is illogical and inconsistent that the review already undertaken at Redditch has not addressed the need for ADR designation. The reasons given for the omission of ADRs at Redditch in paragraph 8.32 are not a credible justification for concluding there will be no need to review Green Belt boundaries for

development beyond 2030 on the periphery of Redditch. Redditch Town Centre regeneration cannot be expected to deliver extensive new housing areas and the redevelopment of areas of the New Town are not expected to result in significantly higher densities and may result in lower density development in the future requiring further peripheral expansion. In the event that the deferral of the Green Belt Review is found sound, contrary to RPS's views, the scope of the review should include consideration of safeguarded land/ADRs on the edge of Redditch.

The District Council will be aware that a Green Belt Review exercise has been undertaken by RPS and FPCR on the periphery of Redditch which was reported in December 2009. This was supplied to both Redditch Borough and Bromsgrove District Councils and is contended to be a robust assessment of areas against the former PPG2 and now NPPF Green Belt purposes and in accordance with policy on boundary definition.

It is noted that consultation feedback is recorded at paragraph 8.37 in terms that "the Council should do the Green Belt review now to ensure sufficient land is available for new development". The counter view that Green Belt should be protected is not a valid reason for not undertaking the review as the objective needs evidence only allows the conclusion that allocation of land for development within the Green Belt is required. No reason is given for not undertaking the review prior to the publication of the Proposed Submission Version of the Plan.

The safeguarding of land also should take account of the potential outcome of the current exercise of assessing Birmingham related needs where Redditch as a former New Town has many attributes which make it an appropriate location for addressing part of the unmet need in Birmingham, albeit in the context of cross-boundary growth into Bromsgrove District.

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

Green Belt review across the wider District must be undertaken sooner in order to fully identify the housing need to 2030.

At Redditch the Green Belt review has failed to identify safeguarded land in accordance with NPPF. Land at Brockhill West should be removed from the Green Belt for a strategic allocation and land north of Brockhill West and west of Brockhill (East) should be safeguarded for potential longer term development needs beyond 2030.

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


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

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

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

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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)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 43-46	Paragraph:	Policy: RCBD1 Redditch Cross Boundary Development
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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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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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)

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

Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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 principle of meeting cross boundary development on the periphery of Redditch to meet Redditch-related needs is strongly supported. It is agreed that exceptional circumstances exist to review the Green Belt boundary for this scale of development and also for safeguarding further land. However, as explained in a separate objection the exceptional circumstances are not considered to exist in respect of the full extent of the Foxlydiate proposal. As presented in a separate representation, Miller, SRD and Persimmon do not fully agree with the selected sites to meet the cross-boundary growth needs and challenges the robustness of the evidence base in this context. The use of 'Brockhill' rather than 'Brockhill East' is inappropriate as there is scope for potential confusion. The adjoining land in Redditch Borough forming the Strategic Site allocation in the Borough of Redditch Local Plan No.4 refers to the site as 'Brockhill East'. Separate representations seek the addition of a new cross-boundary Strategic Site at 'Brockhill West'.

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

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

Signature: [REDACTED]	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)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 43-46	Paragraph:	Policy: RCBD1 Redditch Cross Boundary Development
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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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5. Do you consider the BDP is sound? (see Note 3)

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

Objection is made to the omission of a strategic allocation at Brockhill West for some 900 dwellings in Policy RCBD1 as a suitable and deliverable alternative to the southern (south of Cur Lane) and north-western elements of the Foxlydiat Site 1 proposal. The Foxlydiat site should be reduced to approximately 1,600 dwellings. The 1,200 dwellings reduction from 2,800 can be accommodated appropriately through Brockhill West on a cross-boundary basis of some 1,100 dwellings (including at least some 200 dw in Redditch Borough) together with the increased actual capacity of the Brockhill (East) strategic site in Bromsgrove of about 700 dwellings (rather than the 600 identified in the BDP). There is also potential for further dwellings on the western boundary of the Brockhill (East)

strategic site for additional provision to meet a higher strategic requirement. The scale of proposed cross-boundary development at some 3,400 dwellings is noted. However, it is considered that the objectively assessed needs for Redditch are higher than 6,400 homes for reasons that the updated Worcestershire SHMA concluded the range for Redditch was between 6,235 and 9,724 dwellings. RPS does not accept that selecting a figure close to the bottom of the range accords with national policy ambitions to boost significantly the supply of housing. The provision of some 200 to 250 dwellings at Brockhill West in Redditch Borough will reduce the strategic requirement as currently proposed on a cross-boundary basis in Bromsgrove District. However, the increase in overall requirement above the 6,400 currently proposed overall requirement will need to be accommodated in cross-boundary locations in Bromsgrove District.

The Brockhill West land in Redditch Borough formed part of the Borough Council's five year land supply to the extent of 150 dwellings in 2012 in conjunction then with an expectation part of the site would be used for employment.

The full case for the objection is set out in a separate joint statement report on behalf of Persimmon Homes, Miller Strategic Land and Southern & Regional Developments. The objection to Foxlydiate centres on unsuitability and lack of deliverability.

RCBD1.9(I): Affordable housing needs in Redditch Borough and viability assessment have justified a target of 30%. A consistent approach should be followed between the cross-boundary elements at Redditch. There should be a consequential change to Policy BDP8 accordingly for Redditch related development.

RCBD1.9(II): This criterion should allow for phased applications and Transport Assessments being produced, albeit recognising that the cumulative impacts will need to be assessed as part of the process. The principle should be that each phased scheme should make a fair and equitable contribution towards required transport and other infrastructure (as applied to the Phase 1 Brockhill East application in Redditch Borough).

RCBD1.9(III): The expectation at Criterion (III) that all dwellings will be located within 250m of a bus stop is noted.

It is noted that the summary of consultation does not identify where community preference was expressed for Redditch related growth.

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)

Land at Brockhill West should be allocated as a Strategic Site and 'Brockhill' be renamed 'Brockhill East'

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

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

This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

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)

Miller Strategic Land, Southern & Regional and Persimmon Homes South Midlands: Brockhill West

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

Page: 96-100	Paragraph:	Policy: BDP20 Managing the Historic Environment
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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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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5. Do you consider the BDP is sound? (see Note 3)

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

Part BDP20.3 is not consistent with NPPF policy on built environment. Other parts of the Policy adequately address heritage issues and the need to conserve heritage in accordance with the NPPF.

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)**

Part BDP20.3 should be deleted.


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Signature 	Date: 11.11.13
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[REDACTED]

Sent: 11 November 2013 16:09
To: BDC strategic planning
Cc: Tait, Kate
Subject: JBB8128: Brockhill East - Representations on Bromsgrove DP November 2013 on behalf of Persimmon Homes
Attachments: JBB8128.C1873.reps.BDP.BrockhillEast.Nov13.pdf

Dear Mike/Andy

I hereby submit duly made representations on the Bromsgrove Development Plan on behalf of Persimmon Homes South Midlands.

I request a formal acknowledgement.

Yours sincerely

Mark

[REDACTED]

This e-mail message and any attached file is the property of the sender and is sent in confidence to the addressee only.

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RPS Group Plc web link: <http://www.rpsgroup.com>

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)

Persimmon Homes South Midlands

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

Page: Whole Plan	Paragraph:	Policy:
Policies Map:	Other document:	

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

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

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The use of paragraph numbering throughout is commended.

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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Signature: 	Date: <i>11.11.13</i>
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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)

Persimmon Homes South Midlands

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

Page: 4	Paragraph: 1.13- 1.16	Policy: Duty to Co-operate
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.

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Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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5. Do you consider the BDP is sound? (see Note 3)

Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
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6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

There should be a commitment to review the Plan to deal with Birmingham related development if required. The approach should be similar to that proposed for Redditch Borough and recognise that the cross-boundary implications for Redditch to meet Birmingham's unmet needs within the wider GBSLEP area is likely to have local cross-boundary implications for Bromsgrove District as well as the direct relationship between Birmingham and Bromsgrove District.

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)

Paragraph 1.15 should be more explicit about the outcome of the cross-boundary joint working between Bromsgrove and Redditch Councils in respect of the need for strategic site allocations to meet Redditch-related development needs in Bromsgrove District on the edge of the Redditch urban area.

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)

This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

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)

Persimmon Homes South Midlands

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

Page: 11	Paragraph: 3 Key Challenges	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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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"/>
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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 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)

There is a need for the key challenges to refer to meeting cross-boundary needs relating to Redditch in the plan period and beyond.

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)**

There is a need for the key challenges to refer to meeting cross-boundary needs relating to Redditch in the plan period and beyond.

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

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

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

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

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

This does not require oral evidence.

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)

Persimmon Homes South Midlands

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

Page: 12-13	Paragraph: 4 Vision	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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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"/>
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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 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 Vision should also recognise the need to work collaboratively with Redditch Borough Council to ensure the development needs of this neighbouring authority are addressed sustainably.

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)

The Vision should also recognise the need to work collaboratively with Redditch Borough Council to ensure the development needs of this neighbouring authority are addressed sustainably.

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


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

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

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

This does not require oral evidence.

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)

Persimmon Homes South Midlands

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

Page: 14	Paragraph: 5 Strategic Objectives	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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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"/>
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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)

Objectives SO2, SO5 and SO6 should refer to the importance of delivering sustainable homes, employment opportunities and sustainable transport options for both Bromsgrove District's growth needs and those arising in Redditch Borough which most sustainably should be met on the edge of the Redditch Urban Area in Bromsgrove District.

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)

Reference should be made in SO2, SO5 and SO6 to delivering homes, employment opportunities and sustainable transport options on the edge of Redditch urban area in Bromsgrove District.

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

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

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

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

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

This does not require oral evidence.

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)

Persimmon Homes South Midlands

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

Page: 15	Paragraph: 7 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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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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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)

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

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

Key Diagram is broadly supported in respect of the selection of land at the Brockhill East Strategic Site for strategic housing.

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)**

However, it is requested that the resolution of the web version of page 15 Key Diagram is significantly enhanced as the white text boxes are not legible.

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


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

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

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

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

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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)

Persimmon Homes South Midlands

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

Page: 15	Paragraph: 7, 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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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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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)

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

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

<p>1. The Key Diagram should address the issue of strategic Areas of Development Restraint for potential developments beyond the Plan Period as required by NPPF paragraphs 83 to 85. Land west of the Brockhill East Strategic Site bounded by Weights Lane and Butlers Hill Wood to the north and Cladshill Wood to the west is considered suitable as an ADR to address potential further development needs related to Redditch, recognising that the principle of Redditch's needs being met on a cross-boundary basis has been accepted through the Proposed Submission Version of the Bromsgrove District Plan.</p> <p>2. The identified area of the Brockhill East Strategic Site within Bromsgrove District has a capacity of about 700dw taking account of the assessed constraints.</p>

This justifies amending the indicated site capacity from 600 to 700 dwellings. In the event of the need to compensate for undeliverable housing capacity at Foxlydiat in the Plan period to 2030, having regard also to the suitability of allocating land at Brockhill West for development, consideration should be given to extending the western boundary of the allocated Brockhill East strategic site to include additional land. There a clear and defensible boundary adjacent to the fishing ponds which is a suitable alternative to ensure the delivery of at additional dwellings in this location. In this scenario, the extent of the ADR land referred to at (1) above can be adjusted to be contiguous with the boundary of the allocated site.

3. Persimmon Homes objects to the omission of a Strategic Site at Brockhill West (see separate joint representation with Miller Strategic Land and Southern & Regional Developments) for up to some 1,100 dwellings including about 900 dwellings in Bromsgrove District. Brockhill West is an entirely appropriate location for cross-boundary residential development. The part in Redditch Borough was recently identified as part of the Borough's 5 Year Land Supply despite being within the Green Belt. The Brockhill West land is a suitable and deliverable alternative to the inappropriate extent of the Foxlydiat Strategic Site proposal of 2,800 dwellings which is concluded to conflict with Green Belt policy in the NPPF and is concluded not to be capable of full delivery by 2030. The evidence presented on heritage grounds for excluding land at Brockhill West has been rebutted in previous submissions and is concluded to be an unsound basis for rejecting an otherwise most appropriate option in terms of sustainability appraisal. In terms of housing trajectory delivery, land at Brockhill West in Bromsgrove District is capable of early release in parallel with on-going development at Brockhill East in Redditch Borough, where the Bromsgrove part of the strategic site is expected to follow later in the plan period.

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)

Brockhill West should be added as a strategic site; an ADR should be shown at Brockhill north of Brockhill West and west of the 'Brockhill' Strategic Site (Site 2); and the Foxlydiat Strategic Site should be reduced in extent so it does not extend south of Cur Lane and the western boundary is as shown on the plan at Appendix 3 in the separate report accompanying duly made representations on behalf of Miller, SRD and Persimmon.

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)

This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

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)

Persimmon Homes South Midlands

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

Page: 19	Paragraph:	Policy: BDP 2 Settlement Hierarchy 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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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"/>
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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 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 policy fails to refer to meeting Redditch related housing needs on a cross-boundary basis in the first list of locations from BDP2.1- 2.4.

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)

There should be a cross-reference to Policy RCBD1.1 Redditch Cross Boundary Development.

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


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

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

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

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

This does not require oral evidence as it relates to appropriate cross-referencing and internal consistency.

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)

Persimmon Homes South Midlands

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

Page: 21-22	Paragraph: 8.18-8.26	Policy: BDP 3 Future Housing and Employment Growth
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 checked="" type="checkbox"/>
(2) Effective (see Note 5)	<input type="checkbox"/>
(3) Consistent with national policy (see Note 6)	<input type="checkbox"/>
(4) Positively prepared (see Note 7)	<input checked="" type="checkbox"/>

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

The Plan states clearly that the objectively assessed need to meet Bromsgrove District's housing requirement is just below 7,000 dwellings in the plan period between 2011 and 2030. This excludes cross-boundary provision at Redditch. The Plan however has failed to demonstrate how the full objectively assessed needs will be delivered through identified sources of supply, such that there will be a shortfall of some 2,400 dwellings which will be dependent upon a future review of the Plan in turn dependent on a Green Belt review exercise. This is concluded to be at odds with the NPPF which requires at paragraph 47 bullet 1 that sites which are critical to the delivery of the housing strategy (i.e. to deliver 7,000 homes by 2030) are identified in the Plan. It is considered unsound to defer decisions on some 34% of the required housing delivery in a Plan period to a review of the plan.

The principle of addressing Birmingham related growth through a plan review is accepted as the evidence base for Bromsgrove's potential share of unmet future need in Birmingham has not yet been identified and the approach can be same for Bromsgrove as other 'shire districts' around Birmingham (for example Lichfield in the same GBSLEP area) where Local Plan Examination inspectors have accepted that an early review will be appropriate.

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)

In separate representations, Persimmon Homes with Miller Strategic Land and Southern Regional Developments identify the comparative merits of land at Brockhill West contributing up to some 900 dwellings on the edge of Redditch within Bromsgrove District, contributing towards the identified overall requirement for Redditch Borough. Brockhill West should be a Strategic Site in the plan.

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)

This is a significant strategic issue meriting oral examination and scrutiny of the evidence

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)

Persimmon Homes South Midlands

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

Page: 22	Paragraph: 8.25	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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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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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)

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

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

10
Persimmon supports the recognition of the need for collaborative joint cross-boundary working between Redditch Borough and Bromsgrove District Councils to address the needs of Redditch Borough as identified in paragraph 8.25 and the right column of the table in Policy BDP3.
Land at Brockhill East can contribute effectively some 700 dwellings towards the delivery of needed homes for Redditch in Bromsgrove District on the edge of the Redditch urban area.

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

Persimmon Homes South Midlands

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

Page: 23-25	Paragraph:	Policy: BDP4 Green Belt
Policies Map:	Other document:	

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

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

Yes: No:

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

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 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)

The Bromsgrove District Plan should not be dependent upon a future Green Belt Review to deliver the District's housing requirement. It is noted that a Green Belt review has been undertaken for peripheral growth at Redditch to meet fully identified needs in the period to 2030 which is commended. However, under NPPF paragraphs 83 to 85 regard must be given to future potential development needs such that boundaries do not need to be reviewed again at the end of the plan period. It is noted that the District Council intends to identify safeguarded land (or Areas of Development Restraint (ADRs)) for Bromsgrove District's

needs as part of the Green Belt Review process. It is illogical and inconsistent that the review already undertaken at Redditch has not addressed the need for ADR designation. The reasons given for the omission of ADRs at Redditch in paragraph 8.32 are not a credible justification for concluding there will be no need to review Green Belt boundaries for development beyond 2030 on the periphery of Redditch. Redditch Town Centre regeneration cannot be expected to deliver extensive new housing areas and the redevelopment of areas of the New Town are not expected to result in significantly higher densities and may result in lower density development in the future requiring further peripheral expansion. In the event that the deferral of the Green Belt Review is found sound, contrary to RPS's views, the scope of the review should include consideration of safeguarded land/ADRs on the edge of Redditch.

The District Council will be aware that a Green Belt Review exercise has been undertaken by RPS and FPCR on the periphery of Redditch which was reported in December 2009. This was supplied to both Redditch Borough and Bromsgrove District Councils and is contended to be a robust assessment of areas against the former PPG2 and now NPPF Green Belt purposes and in accordance with policy on boundary definition.

It is noted that consultation feedback is recorded at paragraph 8.37 in terms that "the Council should do the Green Belt review now to ensure sufficient land is available for new development". The counter view that Green Belt should be protected is not a valid reason for not undertaking the review as the objective needs evidence only allows the conclusion that allocation of land for development within the Green Belt is required. No reason is given for not undertaking the review prior to the publication of the Proposed Submission Version of the Plan.

The safeguarding of land also should take account of the potential outcome of the current exercise of assessing Birmingham related needs where Redditch as a former New Town has many attributes which make it an appropriate location for addressing part of the unmet need in Birmingham, albeit in the context of cross-boundary growth into Bromsgrove District.

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)

Brockhill West should be excluded from the Green Belt as a Strategic Site allocation and land safeguarded to the north of Brockhill West and west of the Site 2 Brockhill Strategic Site as an ADR.

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


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

No, I do not wish to participate at the oral examination	<input type="checkbox"/>
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This is a significant strategic issue meriting oral examination and scrutiny of the evidence base.

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)

Persimmon Homes South Midlands

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

Page:43-46	Paragraph:	Policy: RCBD1 Redditch Cross Boundary Development
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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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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5. Do you consider the BDP is sound? (see Note 3)

Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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 principle of meeting cross boundary development on the periphery of Redditch to meet Redditch-related needs is strongly supported. It is agreed that exceptional circumstances exist to review the Green Belt boundary for this scale of development and also for safeguarding further land.

However, as explained in a separate objection the exceptional circumstances are not considered to exist in respect of the full extent of the Foxlydiate proposal.

The inclusion of land at Brockhill East as part of the cross-boundary requirement is supported by Persimmon Homes reflecting the sustainability of the location which also includes land which has been safeguarded in the Redditch Borough Local Plan since 1996 for longer term needs.

As presented in a separate representation, Persimmon Homes does not fully agree with the selected sites to meet the cross-boundary growth needs and challenges the robustness of the evidence base in this context.

The use of 'Brockhill' rather than 'Brockhill East' is inappropriate as there is scope for potential confusion. The adjoining land in Redditch Borough forming the Strategic Site allocation in the Borough of Redditch Local Plan No.4 refers to the site as 'Brockhill East'. Further, land at Brockhill West is a separate area, identified for detailed consideration in the Housing Growth Development Study (January 2013), which is contended to be a most appropriate alternative location for development.

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**)

The use of 'Brockhill East' rather than Brockhill when describing the strategic site.

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


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Objection is made to the omission of a strategic allocation at Brockhill West for some 900 dwellings in Policy RCBD1 as a suitable and deliverable alternative to the southern (south of Cur Lane) and north-western elements of the Foxlydiat Site 1 proposal. The Foxlydiat site should be reduced to approximately 1,600 dwellings. The 1,200 dwellings reduction can be accommodated appropriately through Brockhill West on a cross-boundary basis of some 1,100 dwellings (including some 200-250 dwellings in Redditch Borough) and the increased capacity of Brockhill East to 700 for which there is capacity within the identified site (the site should be renamed as "Brockhill East"). The scale of proposed cross-boundary development at some 3,400 dwellings is noted. However, it is considered that the objectively assessed needs for Redditch are higher than 6,400 homes for reasons that the updated Worcestershire SHMA concluded the range for

x2
x3

Redditch was between 6,235 and 9,724 dwellings. RPS does not accept that selecting a figure close to the bottom of the range accords with national policy ambitions to boost significantly the supply of housing. The provision of some 200 to 250 dwellings at Brockhill West in Redditch Borough will reduce the strategic requirement as currently proposed on a cross-boundary basis in Bromsgrove District. However, the increase in overall requirement above the 6,400 currently proposed overall requirement will need to be accommodated in cross-boundary locations in Bromsgrove District.

The Brockhill West land in Redditch Borough formed part of the Borough Council's five year land supply to the extent of 150 dwellings in 2012 in conjunction then with an expectation part of the site would be used for employment.

The full case for the objection is set out in a separate joint representation on behalf of Persimmon Homes, Miller Strategic Land and Southern & Regional Developments.

The objection to Foxlydiate centres on unsuitability and lack of deliverability.

RCBD1.9(I): Affordable housing needs in Redditch Borough and viability assessment have justified a target of 30%. A consistent approach should be followed between the cross-boundary elements at Redditch. There should be a consequential change to Policy BDP8 accordingly for Redditch related development.

RCBD1.9(II): This criterion should allow for phased applications and Transport Assessments being produced, albeit recognising that the cumulative impacts will need to be assessed as part of the process. The principle should be that each phased scheme should make a fair and equitable contribution towards required transport and other infrastructure (as applied to the Phase 1 Brockhill East application in Redditch Borough).

RCBD1.9(III): The expectation at Criterion (III) that all dwellings will be located within 250m of a bus stop is noted.

It is noted that the summary of consultation does not identify where community preference was expressed for Redditch related growth.

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)

Brockhill West should be excluded from the Green Belt and allocated as a Strategic Site on a cross-boundary basis.

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

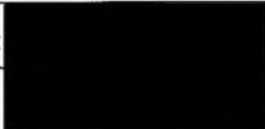
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Signature: 	Date: 11.11.13
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Part B (see Note 1 and Note 8 para 4.2)

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

Name or Organisation (see Note 8 para 4.1)

Persimmon Homes South Midlands

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

Page: 96-100	Paragraph:	Policy: BDP20 Managing the Historic Environment
Policies Map:	Other document:	

12

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 checked="" type="checkbox"/>	No: <input type="checkbox"/>
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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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5. Do you consider the BDP is sound? (see Note 3)

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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)

Part BDP20.3 is not consistent with NPPF policy on built environment. Other parts of the Policy adequately address heritage issues and the need to conserve heritage in accordance with the NPPF.

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)**

Part BDP20.3 should be deleted and following parts of the policy renumbered.

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

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

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

Signature:

[Redacted Signature]

Date: **11.11.13**

Duplicate

RPS

**BROMSGROVE DEVELOPMENT PLAN AND
BOROUGH OF REDDITCH LOCAL PLAN NO.4
THE CASE FOR ALLOCATION OF BROCKHILL
WEST AS A STRATEGIC SITE**

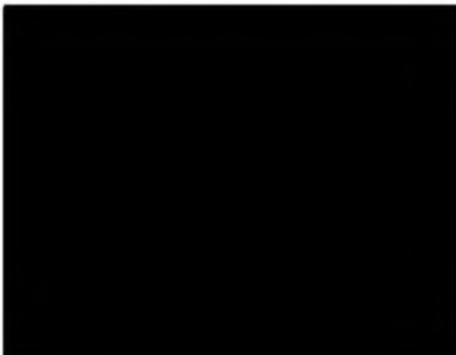
ON BEHALF OF

**MILLER STRATEGIC LAND, SOUTHERN &
REGIONAL DEVELOPMENTS AND
PERSIMMON HOMES (SOUTH MIDLANDS)**

NOVEMBER 2013

11 November 2013

Our Ref: JBB7661/C1864



QUALITY MANAGEMENT

Prepared by:	[REDACTED]
Authorised by:	[REDACTED]
Date:	11 November 2013
Project Number/Document Reference:	JBB7661/C1864

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1 INTRODUCTION

- 1.1 RPS Planning & Development is retained by Miller Strategic Land (Miller), Southern & Regional Developments (SRD) and Persimmon Homes South Midlands (Persimmon) to represent their interests in development of a Sustainable Urban Extension or Strategic Site to the north west of Redditch at Brockhill West.
- 1.2 The land promoted for the SUE, shown on the Site Location Plan at Appendix 1, is controlled by Miller, SRD and Persimmon. Miller and Persimmon are national housebuilders who are active in the West Midlands and Worcestershire. Persimmon has been particularly active in Redditch over an extensive period. The Consortium has collaborated on site assessments and masterplanning of the land in seeking to deliver a development of a suitable design and layout for the area. This is explained further in Section 3.
- 1.3 The proposed development is for up to 1,100 dwellings, a 1 FE First School, a community hub, extensive open space and recreation and appropriate infrastructure as illustrated on the revised Concept Masterplan at Appendix 2. The original concept Masterplan is also attached at Appendix 2 for completeness.
- 1.4 This statement has been prepared as evidence for the Examination of the Bromsgrove District Plan (BDP) and the Borough of Redditch Local Plan No.4 (BRLP4) which jointly seek to address the required growth of Redditch over the plan period from 2011 to 2030. It accompanies duly made representations on both the BRLP4 and BDP during the statutory consultation period. The statement draws on evidence previously submitted to both Redditch Borough Council (RBC) and Bromsgrove District Council (BDC) in demonstrating that this is an appropriate location for a Strategic Site as a positively planned, justified and effective alternative to inappropriately proposed land at Foxlydiate in Area 1 identified in the Proposed Submission Version of the BDP. The statement also demonstrates the deliverability of the Brockhill West proposals and challenges the prospects of successful delivery of the Foxlydiate site in respect of 2,800 dwellings by 2030.
- 1.5 In specific representations on the Draft Development Plans related to Redditch growth, RPS has challenged whether the Plans appropriately identify the objectively assessed need for new homes in the Plan period and interpret the evidence as justifying a higher level of provision.
- 1.6 The need for a Green Belt Review to address Redditch related development needs has been demonstrated to meet even the scale of development in the draft Plans. The NPPF is clear that when boundaries are reviewed they should be redrawn to ensure there is no need to alter them again at the end of the plan period. This is a very clear policy statement that land should be safeguarded to potential longer term development needs beyond 2030 at Redditch. As presented by RPS and FPCR in the Redditch Green Belt Review of December 2009, there are defensible Green Belt boundaries at Brockhill West and Brockhill North which can appropriately allow land to be allocated for development and safeguarded for potential future development as part of the Green Belt boundary alteration in the BRLP4 and BDP at Redditch.
- 1.7 The statement sets out the following:
 - Section 2 – addresses the comparative suitability and sustainability of the Brockhill West and Foxlydiate sites to meet the 6,400 dwellings established as Redditch's strategic

housing growth needs between 2011 and 2030, having regard to the suitability of other sources of supply;

- Section 3 – provides details about the land availability and demonstrates that there are no ownership constraints for delivery;
- Section 4 – demonstrates that achievability of the proposals and responds to concerns about the proposals explaining mitigation and the physical benefits it will provide;
- Section 5 – explains how the development can be phased; and
- Section 6 – provides conclusions and recommendations.

Legal Tests for Duty to Co-operate

- 1.8 As part of the preparation of this statement, RPS has also given consideration to the whether the legal tests related to the Duty to Co-operate (DtC) have been met in the context of work related to meeting Redditch related growth needs.
- 1.9 It is accepted by RPS that since July 2012, the **legal** requirements of the DtC have been met effectively in the preparation of both Plans in respect of meeting Redditch related growth needs. It is the soundness of the outcomes of the process in respect of Redditch related growth which is at issue and which is addressed in this statement. For the avoidance of doubt, RPS accepts that there are likely to be challenges to the legality of the DtC by Redditch Borough and Bromsgrove District Councils in respect of other cross-boundary issues and this statement does not address those issues.

2 COMPARATIVE SUITABILITY AND SUSTAINABILITY

Introduction

- 2.1 This section addresses the comparative merits of Brockhill West and the wider Foxlydiat proposal in respect of suitability and sustainability and challenges the conclusions of the Housing Growth Development Study which has been presented as evidence base to justify the exclusion of Brockhill West and the inclusion of a proposal at Foxlydiat for 2,800 dwellings.
- 2.2 Before addressing the comparative assessment, the extent of the evidence prepared on behalf of Miller, Persimmon and SRD and submitted to the Local Planning Authorities over an extensive period is set out as context.

Brockhill West – Submitted Evidence

- 2.3 RPS has worked with a team of specialist consultants to adduce comprehensive evidence on the suitability and sustainability of land at Brockhill West over a considerable period of time. RPS participated in the Bromsgrove District Local Plan Modifications Inquiry which examined the suitability of different locations within the District as safeguarded land (or Areas of Development Restraint) in 2002 for potential strategic development needs beyond 2001. The Inspector recognised that land at Brockhill West offered sustainable development advantages although he found that the potential need for further cross-boundary development at Redditch in Bromsgrove District (to employment uses at Ravensbank Business Park) should be addressed first at a strategic level.
- 2.4 Since then, RPS has participated in the West Midlands Regional Spatial Strategy Phase 2 Revision (WMRSS2), which addressed housing and employment land needs for 2006 to 2026, including the Examination held in summer 2009 and reported on in September 2009. RPS adduced evidence that the studies commissioned from White Young Green (WYG) as evidence base for the WMRSS were flawed in respect of their comparative assessments of development locations on the periphery of Redditch. RPS presented the case that a comprehensive Green Belt Review had not been undertaken as part of the WYG work and that the landscape impacts of different locations had not been considered robustly. The Panel concluded that options east of A441, favoured by WYG, at Bordesley would have significant Green Belt harm and there were better options which included fuller use of land within Redditch Borough including existing ADRs and land next to ADRs (which WYG recommended should be redesignated as Green Belt). The Panel recommended that 7,000 dwellings be delivered at Redditch between 2006 and 2026 of which 4,000 should be in Redditch Borough and 3,000 in Bromsgrove District. The Panel identified the need for close co-operation between Redditch, Bromsgrove and Stratford-on-Avon District Councils.
- 2.5 Following the publication of the WMRSS2 Panel's Report (Appendix 3 – relevant extract), Miller, SRD and Persimmon commissioned RPS and FPCR to undertake a Green Belt Review of Redditch which was completed in December 2009 and provided to both Redditch Borough and Bromsgrove District Councils. It is requested that this document be provided to the Examination Inspector(s) for BDP and BRLP4. The Review concluded that four main areas could be removed from the Green Belt to accommodate allocation requirements to 2026 and potential future longer term development needs through the designation of safeguarded land or ADR land.

- 2.6 Appendix 4 reproduces the conclusions of the Green belt Review. This identified development potential (A) Foxlydiate (to a limited extent in the central/eastern part of the BDP current proposal); (B) land at Brockhill West (B1) and at Brockhill East and North (B2); land north west of Church Hill (C); and, for employment, and adjacent to Ravensbank Business Park (D1 and D2). A cautious approach was taken to development capacity in the assessment.
- 2.7 Prior to the change in national Government in May 2010, Bromsgrove District Council and Redditch Borough Council embarked on a course of collaboration on preparing consistent development plans which would seek to deliver development in accordance with the submitted WMRSS2 (which proposed 6,600 dwellings in total with a suggested split of 3,300 dwellings in each district) and subsequently the Panel's recommendations. Initial consultation was undertaken in respect of an arc for growth in Bromsgrove District around the west and north sides of the town in October 2008 and the extent of co-operation is recorded in the BDP Statement of Compliance with Duty to Co-operate (DtC).
- 2.8 A joint site meeting was conducted on 13 May 2010, attended by officers from both Councils and Joe Holyoak, urban design consultant retained by RBC, as well representatives from RPS Planning and Transport, FPCR and the developers. This covered Brockhill East, North and West.
- 2.9 From May 2010, the new Government made it clear that the WMRSS2 would not become the development plan and that the previous WMRSS (RPG11) would be revoked. The history shows reluctance by BDC to engage constructively with RBC on cross-boundary growth until July 2012, which was triggered principally by advice from PINS in April 2012 in respect of the significance of the DtC.
- 2.10 In October 2010, RPS collated an evidence base portfolio for Brockhill West on behalf of Miller, SRD and Persimmon which was submitted to both Councils. This was updated in January 2011 to address a scenario, were the co-operation between the two Councils to falter, of the initial allocation of land within Redditch Borough at Brockhill West prior to any decision over the future allocation of adjoining land in Bromsgrove District. This again was submitted to both Councils. It is requested this composite information from January 2011 be supplied to the Examination Inspector(s) for BDP and BRLP4.
- 2.11 Appendix E of the Portfolio addresses Historic and Cultural Heritage and refers to the relationship of the site to the Hewell Grange heritage asset. Appendix F addresses ecological matters and the potential for any adverse harm to the Hewell Grange lake SSSI or Special Wildlife Sites in the area. The assessments presented analysis and drew conclusions on the absence of adverse impacts on these grounds.
- 2.12 In the Revised Preferred Draft Core Strategy for Redditch, in January 2011, Brockhill West was proposed as a Strategic Site in Policy 30 for 150 dwellings and 2.5ha of employment. The Borough Council received responses from English Heritage and Bromsgrove District Council. Neither response raised concerns over the potential impact of development on the Brockhill West proposed Strategic Site in Redditch Borough on the Heritage Assets at Hewell Grange. Similarly, RPS is not aware of any statutory consultees suggesting the development of the site would have any adverse impacts on the Hewell Grange lake SSSI or any Special Wildlife Sites in the area.
- 2.13 In summer 2011, RBC officers requested that RPS adduce further evidence on Brockhill West to address an issue over the potential for workable mineral deposits on the wider cross-boundary site

area in response to an issue raised by Worcestershire County Council (WCC) as minerals planning authority. A specialist consultant was commissioned to prepare a report for agreement with WCC for submission as additional evidence for the development plan. D K Symes Associates report was completed in December 2011 and has been provided to the Local Planning Authorities. The study concluded that there were no viable workable mineral resources on the site and the conclusion was accepted by WCC and Redditch Borough Council.

- 2.14 In the 2012 Redditch Borough Strategic Housing Land Availability Assessment (SHLAA) and 5 Year Housing Land Supply Statement, Brockhill West was identified as a deliverable housing site capable of providing 150 dwellings within the 5 year period between 2012 and 2017. It is noted that an update was published in January 2013 excluding the site, to be consistent with a later decision that the site should not be allocated.
- 2.15 During the autumn of 2012, RPS and the Brockhill West site promoters were invited to discuss the site jointly with officers of both Councils. No indication was given by the officers that heritage or ecological constraints were considered to be grounds for not pursuing an allocation of the land.
- 2.16 The Housing Growth Development Study January 2013 (HGDS) for Redditch was prepared jointly by RBC and BDC. The study started with a full sweep of broad locations around Redditch which discounted many potential areas. Areas 4 (Foxlydiate), 5 (Brockhill West), 6 (Brockhill East and North), 8 (Bordesley) and 11 (north of Weights Lane) were identified as meriting further consideration through focused area appraisal. For ease of appreciation, it should be noted that Areas 5 and 6 at Brockhill West and East are cross-boundary areas including land within both Redditch Borough and Bromsgrove District which can readily facilitate planned integration with the Redditch urban area. Areas 4, 8 and 11 are all entirely within Bromsgrove District. It was recognised that to deliver over some 4,500 dwellings outside the Redditch urban area, multiple sites would need to be identified on the edge of the town. RPS welcomes the inclusion of Brockhill West in the locations selected for focussed area appraisal in Chapter 6 of the HGDS.
- 2.17 Potential concerns over impacts of the Brockhill location on heritage and ecological assets only came to RPS's attention at the end of 2012 when proposals were published to seek to meet 3,400 dwellings in Bromsgrove District towards meeting Redditch-related needs on the basis of at least 600 dwellings at Brockhill East and a new proposal for 2,800 dwellings at Foxlydiate to the south of A448.
- 2.18 The draft proposals were consulted on in April and May 2013 to which Miller, SRD and Persimmon responded including statements on heritage and landscape grounds rebutting a document published in April 2013 entitled Hewell Grange Estate: Setting of Heritage Assets Assessment prepared by Bromsgrove District Council Conservation prepared by CgMs and FPCR. In brief, CgMs and FPCR do not regard the Council's statement as a robust assessment which can withstand scrutiny (these documents are part of the Other Sites evidence base on the BDC BDP evidence base web pages). The reports' conclusions, which are explained and justified, are that Brockhill West can be acceptably developed at a scale of some 1,000 to 1,100 dwellings without substantial harm to the Hewell Grange Registered Park and Garden or the designated Conservation Area. Impacts can be appropriately mitigated involving a substantial retained undeveloped buffer area within which there are alternative appropriate landscaping options that can be considered with a heritage or wooded landscape emphasis. Appendix 5 reproduces the FPCR landscape recommendations of June 2013 which sets out these landscape options.

- 2.19 In brief, as demonstrated further below, the evidence does not substantiate the conclusion in the Housing Growth Development Study of January 2013 on the relevant part of Area 5 south east of the Hewell Grange heritage assets that ***“the potential impact on the heritage assets at Hewell Grange Conservation Area and the Registered Hewell Grange Grade II* Historic Park, raises substantial concerns as to the suitability of Area 5 to take housing growth to meet the needs of Redditch Borough. The views in and out of the heritage assets would be compromised by new development, as well as damage to the rural setting, which is a key feature of the country estate”*** (paragraph 6.2.110) and that ***“due to impact on the Hewell Grange RPG and CA, Area 5 is not considered a suitable option for an urban extension to Redditch”*** (paragraph 6.2.112).
- 2.20 In the response to the April/May consultation on Redditch Housing Growth, the RPS response challenged the conclusions of the study in respect of both Area 4 (Foxlydiate) and Area 5 (Brockhill West). There are substantive comparative matters where RPS takes issue with the conclusions of the HGDS and the Sustainability Appraisal in respect of both suitability and delivery. This section focuses on the former matters of suitability and sustainability appraisal.
- 2.21 RPS and the Brockhill West developer consortium do not challenge the conclusions drawn on the unsuitability of Areas 8 and 11 to meet housing growth requirements for Redditch in the plan period. These conclusions relate principally to Green Belt purposes and lack of suitability for housing on the limited part of Area 11 which may have development potential. Neither area is particularly well related to Redditch.
- 2.22 Area 6 (Brockhill East) is agreed to be an entirely sound location for cross-boundary development, where indeed housing building has already been approved and is under construction on part and the subject of a resolution to grant on a further area in Redditch Borough. Worcestershire County Council is proposing the relocation and expansion of an existing First School (Holyoakes Fields) from a constrained site near the town centre to Brockhill East within the same catchment area. It is the closest ‘focussed area appraisal’ site to the town centre and to a major employment area. There are no significant constraints which cannot be accommodated (development should be kept below the ridgelines) and RPS concurs with the advantages identified in HGDS paragraphs 6.3.82 to 88:
- ***“This area (identified land in Bromsgrove District) could potentially integrate with these proposals (committed and identified land in Redditch Borough) as well as the existing development at Brockhill”*** (6.3.82)
 - ***“close proximity to a number of bus services with frequent services in and around Redditch ... development in this area could lead to an improvement of some services and could also potentially lead to additional services”*** (6.3.83)
 - ***“development could potentially give people greater access to the countryside through green corridors that could successfully be designed into any scheme”*** (6.3.87)
 - ***“the perimeter to the area would create strong defensible Green Belt boundaries to contain development and prevent urban sprawl ... Weights Lane forms the northern boundary ...”*** (6.3.88)
- 2.23 There is, however, concluded to be some potential for additional development in the plan period on the western edge of the identified Area 6 development land extending towards the fishponds. This

could accommodate some additional 200 dwellings while respecting the broad locational principles affecting this area.

- 2.24 The prime area of contention therefore concerns the comparative merits of Area 5 Brockhill West and parts of Area 4 which have been included as the Foxlydiatle Site 1 proposal.
- 2.25 Section 4 of this report addresses matters of deliverability.

Comparative Assessment

- 2.26 This comparative assessment focuses on the material differences between parts of Area 4 and the Brockhill West proposals presented on the Masterplan at Appendix 6 to this statement within the wider Area 5. There are several assessment measures which are broadly neutral relating to loss of greenfield land, agricultural land quality, ability to manage crime reduction, community cohesion, waste management and energy efficiency. Accordingly, it is considered appropriate to focus on the comparative merits of areas against critical criteria within the three dimensions of sustainability – economic, social and environmental having regard to scope for mitigation of potential negative impacts. In addition to sustainability criteria, growth at Redditch must also fundamentally be assessed against Green Belt impacts in accordance with NPPF.
- 2.27 It is accepted the core of Area 4 which is north east of Cur Lane and south west of the Foxlydiatle junction could be appropriately developed. This is the Phase 1 area described in the information submitted on behalf of Heyford Developments with a capacity of some 1,000 dwellings. Although the land raises concerns over Green Belt purposes in respect of encroachment, urban sprawl and coalescence, the south eastern part of the Heyford Developments Phase 3 area (within the part proposed for development on the Phase 3 Concept Plan) is considered capable of acceptable development subject to more substantive boundary landscaping and buffering with capacity for some 550 to 600 dwellings. Accordingly, RPS accepts that the north eastern part of the Foxlydiatle site, north of Cur Lane, is a suitable proposal for some 1600 dwellings in the Plan period to 2030.
- 2.28 The selection of Area 5, including Brockhill Wood and part of the Hewell Grange Conservation Area and RPG, for focused assessment is considered strange as those parts of Area 5 have never been considered appropriate areas for development growth of Redditch. The relationship of new development to Brockhill Wood was closely assessed in the 1980s and 1990s in the context of the completed Brockhill development. A successful relationship between the development and the Wood has been managed for the last 15 or so years. Similarly, through effective masterplanning, a suitable relationship can also be established between development at Brockhill West with Brockhill Wood, the Hewell Grange Conservation Area, RPG and Hewell Park Lake SSSI. The Foxlydiatle Wood south of Brockhill Drive is an existing publically accessible asset from which the proposed development would benefit with convenient access to a well-managed area.
- 2.29 Area 5 should appropriately be assessed on the basis of the Masterplan-led approach that Miller, Persimmon and SRD have taken to the area which excludes proposals on designated heritage and ecological areas and proposes appropriate buffers and green infrastructure provision.
- 2.30 Area 5's inclusion, on the reduced basis, for focused area appraisal is entirely appropriate and following sub-sections of this statement address the relevant key considerations.

Green Belt Purposes

- 2.31 HGDS addresses Area 4 in the context of Green Belt issues from paragraph 6.1.51 to 6.1.70. RPS concurs with the report at 6.1.53 that checking unrestricted sprawl for Area 4 is a significant issue and that Cur Lane, which bisects the area, could be a more appropriate strong boundary within the area to check urban sprawl.
- 2.32 Coalescence risk with Tardebigge due to the narrowing of the existing gap is identified as a significant issue in HGDS paragraphs 6.1.55-56. This is a strong reason for limiting the westward extent of development in Area 4. Photograph 78 on page 76 of HGDS shows how the western part of the northern area is expansive and rural notwithstanding the line of the A448 to the north.
- 2.33 It is agreed that the north eastern part of Area 4 is well contained and would involve limited encroachment (HGDS 6.1.61 refers). Development on the western edge of the land however on the rising land towards the ridgeline would appear as visual encroachment into expansive countryside from the east and obstruct current open view towards Tardebigge Church spire from the A448.
- 2.34 The southern segment of Area 4 south of Cur Lane is considered from HGDS paragraph 6.1.62. It is stated clearly that identifying a strong and defensible boundary is "very difficult". The study identifies the location of Photo 54-A on page 231 as relating to this area. However, that photograph which faces westwards across the southern area is not included in the report in the Area 4 assessment with that name (it may be Photo 5A labelled in error on page 62). In brief, the study, in RPS's submission fails to demonstrate that land south of Cur Lane is well contained and would restrict encroachment and check urban sprawl. Much attention is given to the expansive nature of Area 4 south of Cur Lane and there is not an adequate justification for the southern wing of the proposed Foxlydiate development area in respect of Green Belt impact. Photo 67A demonstrates that land south of Cur Lane is an expansive open area where development should be restricted.
- 2.35 RPS fully accepts that the western part of the Area 4 assessed land is poorly contained and not appropriate for development. It is very detached from Redditch.
- 2.36 The conclusion should be that Cur Lane forms a strong, logical and defensible southern boundary to development west of Web Heath. The strongest western boundary is that shown on page 227 of the HGDS as Boundary 3 in respect of the Area 4 Reduced Capacity area. RPS accepts that an alternative boundary associated with the hedge line along the valley bottom running north/south to the north of Cur Lane further west Boundaries 4 and 4 on page 227 as advanced on behalf of Heyford Developments (shown on drawing 30350/06, May 2013) for the limit of development would be acceptable, although reinforcement woodland planting adjacent to the existing hedge line would be appropriate in conjunction with development.
- 2.37 The Green Belt issues associated Area 5 Brockhill West are addressed in the HGDS from paragraph 6.2.53. The first paragraph seeks to introduce heritage protection generally as a purpose of the Green Belt. The NPPF sets out the five purposes served by Green Belt. This does not include protecting heritage assets but expressly includes at the fourth bullet (NPPF paragraph 80) "**to preserve the setting and special character of historic towns**". Never, in the history of the West Midlands Green Belt since 1975 has the preservation of the setting of Redditch New Town been identified as a purpose served by the Green Belt around Redditch. The impact of potential

development on the heritage assets at Hewell Grange is a significant matter for consideration. It should not however be linked to assessment of the area in respect of Green Belt purposes.

- 2.38 The conclusion that coalescence risk between Brockhill West and Tardebigge does not arise at HGDS Paragraph 6.2.62 is noted and supported.
- 2.39 RPS concurs that the landform and containing woodland blocks would prevent the appearance of urban sprawl at Brockhill West (HGDS para 6.2.55). Hewell Lane is identified as a particularly strong and effective boundary (para 6.2.56). It is not accepted that development on Brockhill West would appear as sprawl from any viewpoint. From the north, the development would be seen in the Batchley Brook valley and below the landmark buildings at Tack Farm (photo 27). This is a short view framed between Brockhill Wood and Gladshill Wood from near Brockhill Farm (albeit photopoint '27' is not from a public vantage point being some distance to the south of Brockhill Lane).
- 2.40 The HGDS assessment refers to a risk of sprawl towards Hewell Grange where the land is lower. It is not clear to RPS from where it is contended the appearance of such sprawl would be perceived. However, the hedgerow identified as Boundary 9 on HGDS page 228 is very strong as a feature that can effectively contain development and keep the Batchley Brook valley floor open as an extensive buffer area to the Hewell Grange Conservation Area avoiding any appearance of sprawl and fundamentally limiting encroachment very effectively.
- 2.41 The HGDS presents information relating to the local topography within the Brockhill West area on the basis that development in certain areas would be visually prominent in local views. The conclusion that there would a high level of visibility within this area is refuted. It is not accepted that there would be countryside encroachment which would be harmful to Green Belt objectives in the context of the need for development.
- 2.42 As the Local Planning Authorities will be aware, significant work has been undertaken by FPCR on the visual impact of development within the Brockhill West area where local ridgelines have been taken into consideration in the Masterplan. The site is very well contained and the siting of development within the site and the location of extensive proposed green infrastructure can be achieved acceptably and without causing harm to the Green Belt purpose of checking sprawl and by acceptably safeguarding the countryside from encroachment given the need for very extensive releases of land from the Green Belt around Redditch to meet identified and objectively assessed needs.
- 2.43 Paragraph 6.2.60 of the HGDS appears to imply that the Brockhill West Masterplan includes development on the Batchley Brook valley floor, where there is flooding risk, and close to the Hewell Kennels. Neither of these is the case. However, as demonstrated by Photo 39A on page 105, the area around Hewell Kennels is very well contained in the landscape.
- 2.44 The work by FPCR most recently which has addressed the heritage based objections to the selection of Brockhill West concludes that the visual impact to and from the Hewell Grange RPG and Conservation Area is not significant and the relationship between the heritage assets and the proposed development is entirely acceptable given the green infrastructure buffer which is available and the disposition of land uses including strategic open spaces.
- 2.45 It is agreed that the south eastern part of the Brockhill West area has no relationship with the heritage assets and even if the rest of the assessment on Green Belt impact was found to have any

merit (not accepted by RPS and FPCR, there is no justification for omitting the allocation of the highlighted area for development on the purple shaded area on the plan on page 228 of the HGDS.

- 2.46 RPS does not accept that the boundaries associated with the heritage assets are inappropriate for use to define the Green Belt boundary. They will be long term defensible boundaries. Evidently, there are other means of securing the enduring protection of an appropriate buffer between a sustainable urban extension at Brockhill West and the Hewell Grange heritage assets. Appendix 3 provides the altered Green Belt boundary advocated by RPS and FPCR for the wider Brockhill area.
- 2.47 The disposition of areas for development within land excluded from the Green Belt is a separate exercise which will be informed by site assessment on a range of issues including areas of flooding risk, heritage assets, local topography, ecology, and so on. As stated above, it is not appropriate to conflate the consideration of Green Belt purposes with heritage conservation, although it would be appropriate to consider the compatibility with the exclusion of a general area for potential development from the Green Belt with any in principle policy constraint to development. As demonstrated through the wealth of information and assessments by all parties, Brockhill West is an area which merited focused area appraisal and is an area which can appropriately be considered to meet Redditch-related growth needs.
- 2.48 There would be no substantial harm resulting from the development to, or loss of a designated heritage asset. The proposals at Brockhill West minimise any perceived conflict between the heritage asset's conservation and the conservation of its setting.
- 2.49 Area 5 should have been drawn to exclude the Hewell Grange RPG. At no stage have the promoters of Brockhill West suggested it should be removed from the Green Belt or identified for Redditch-related growth.
- 2.50 Fundamentally, it is refuted that the case has been substantiated in the HGDS that the Brockhill West area fulfils a Green Belt role that precludes its allocation for sustainable development to meet Redditch-related development needs sustainably.

Economic Considerations

- 2.51 As addressed below under Social Considerations, accessibility of proposed new housing to the town centre and employment areas is a key consideration in assessing the comparative merits of locations in respect of sustainability. RPS concurs with the Sustainability Appraisal findings that Brockhill West performs better than both Area 4 and Area 4 reduced (Foxlydiate) in respect of the EC criteria (Criterion EC3 expressly refers).
- 2.52 The HGDS makes a statement at paragraph 6.1.46 that Area 4 may have an advantage of being more likely to assist in the regeneration of both Redditch and Bromsgrove Town Centres than other locations. First, it is noted that this perceived 'possible benefit' has not translated into a higher Sustainability Appraisal score for Area 4 than for Area 5. Second, the key role of growth for Redditch must be to maximize the sustainability of Redditch including Redditch's town centre. A growth location which could dilute that by supporting another town centre is a disadvantage in RPS's view in terms of impact on Redditch Town Centre and the need for additional travel over a greater distance, contrary to the objective nationally of seeking to reduce the need for travel.
- 2.53 It is suggested at HGDS paragraph 6.2.48 that the Area 5 location may also assist Bromsgrove Town Centre as a possible advantage. As stated above RPS does not see that as a potential

advantage. However, as Brockhill West is much closer to Redditch Town Centre with better potential for public transport and cycle access, the Brockhill West site is more likely to support Redditch Town Centre which should be the principal objective in this context.

- 2.54 It is not accepted that the proposed development at Brockhill West is likely to impact on the operation of the Hewell Kennels given the distances between proposed housing development and the kennels.
- 2.55 It is concluded that Brockhill West outperforms Area 4/Foxlydiat on economic sustainability grounds. Brockhill merits '++' on Criterion EC3.

Social Considerations

Accessibility

(a) Rail

- 2.56 Brockhill West is significantly closer to the Redditch rail/bus public transport interchange than the southern wing of Site 1 within Area 4. The HGDS refers to 3.2km to the interchange from the centre of Area 5 (from the B4184 Lily Green Lane roundabout taking Brockhill Drive and Hewell road towards the station) (para 6.2.25 refers).
- 2.57 From Area 4, the rail/bus interchange is described as 4.5km away at HGDS paragraph 6.1.25 although the start point and route is not declared.

(b) Bus

- 2.58 There is an existing 20 minute frequency bus service in the Batchley area adjoining Brockhill West as well as other hourly services. The high frequency service can readily be extended to serve the new development and consideration can be given to increasing the frequency. This is considered more feasible than seeking to achieve a totally new high frequency service within Area 4.
- 2.59 The statement that extending existing bus services may be more readily achieved at Area 4 and Area 4 Reduced than other locations (HGDS para 6.1.47) is not accepted by RPS as this is considered to be much more readily achievable at Area 5 Brockhill West as indicated correctly in HGDS paragraph 6.2.49. It is considered that Area 4 Reduced should be scored '1' rather than '2' on SA Criterion S5.

Employment and Facilities

- 2.60 The distance from Brockhill West to the town centre and nearest employment area at Enfield is significantly shorter than that from Area 1, particularly the southern part. The Enfield employment area is 2.4km (HGDS para 6.2.27) away from Brockhill West which is well within the recommended cycle distance of 5km. In contrast, Enfield employment area is 5.5km from Area 4 (HGDS para 6.1.28). The comparable distances to the Kingfisher Shopping Centre are 3.3km from Brockhill West and 4.7km from Foxlydiat (same HGDS paragraphs refer).
- 2.61 Although Brockhill West is closer to First School provision than Area 4, it is accepted that both areas could be expected to provide new First Schools on site. However, Brockhill West is substantially closer to Middle School and High Schools at Birchensale Middle and Trinity High Schools which

respectively are 3.0km and 3.8km from Brockhill West and about 5km and over 6km away from Area 4. There are no proposals to provide a new Middle School as part of the Foxlydiate development.

- 2.62 Demonstrably, Area 4 is significantly less well related to facilities and employment in Redditch than Brockhill West. The HGDS report concludes at paragraph 6.2.31 on Brockhill West that **"overall this area has good accessibility to the majority of facilities"**. Accordingly, on the sustainability appraisal criteria relating to accessibility, Brockhill West should score higher with '+' on each. Area 4 has been over-scored on Criterion S2 in RPS's view as access to footpaths in the countryside does not outweigh the remoteness of the site from facilities in RPS's view.

Public Rights of Way

- 2.63 There is evidently scope through the masterplan of the Brockhill West area to create a network of new footpaths which can enhance public accessibility of the retained green infrastructure within the development. It is noted that Path 536(D) to the south of Tack Farm is of very little value currently for public enjoyment as it is a short cul de sac. Path 539(C) would continue to run through a swathe of open land through the Batchley Brook valley to which secondary new routes can be created (see HGDS Figure 9 and paragraphs 6.2.18).
- 2.64 In contrast to both Brockhill East and West, there is an extensive network of connected footpaths and quiet country lanes in the southern part of Area 4 including the nationally significant Monarch's Way long distance footpath.
- 2.65 It is concluded that Brockhill West outperforms Area 4/Foxlydiate on social sustainability grounds.

Environmental Considerations

Ecology

- 2.66 The HGDS on Area 5 suggests that little information exists on the ecology of the area (paragraph 6.2.13). This statement is not appropriate as work undertaken by FPCR on the ecology of the area have been provided to the Local Planning Authorities. Masterplanning work on the site has incorporated appropriate measures to retain and protect important habitats and the future management of the Green Infrastructure can facilitate both mitigation and betterment in respect of meeting suitable biodiversity objectives.
- 2.67 As stated above, it is unclear to RPS why Area 5 is assessed on the basis of development potentially within the identified areas of Hewell Grange and Brockhill Wood as neither of these are proposed for housing or related growth and suitable buffers are agreed to be necessary and appropriate.
- 2.68 It is accepted that the Site 1 land within Area 4 can, in principle, be developed acceptably in respect of ecological impact subject to appropriate mitigation.
- 2.69 However, the same applies to the Brockhill West masterplan area. The Hewell Park Lake SSSI is significantly upstream from the proposed development area and the separation distance is significant. An appropriate buffer can be established between new development at Brockhill West and Brockhill Wood has been achieved on the neighbouring existing Brockhill development and has been found acceptable for the Site 2 proposal at Brockhill (East) which lies across Brockhill Lane from the woodland.

- 2.70 The Brockhill development has included community woodland elements adjacent to Brockhill Drive (well established) and east of Brockhill Lane (planted more recently). Well-designed green infrastructure at Brockhill West can deliver further community woodland areas consistent with its wooded estate landscape character.
- 2.71 It is in this context that RPS refutes the Sustainability Appraisal scoring of Brockhill West as '--' whereas Area 4 reduced is recorded as '-' under Criterion E1. If the reason is that the assessment of Area 5 was made in a scenario that development was proposed within the Hewell Grange Park, including the SSSI, then this is considered perverse and undermines the basis of the Sustainability Appraisal which should assess the Brockhill West proposal before the Local Planning Authorities and not an area wide approach. It is noted that Area 4 was reduced for the assessment and RPS contends that Area 5 similarly should be adjusted to reflect the Brockhill West proposal.
- 2.72 On ecological impact, it is considered both sites merit a score of '-', with no advantage being allotted to Area 4 Reduced.

Heritage

- 2.73 It is noted in the Sustainability Appraisal of Area 4 overall and the reduced Area 4 that heritage impact under Criterion E4 is neutral, despite the need for further surveys in the former case which are required to examine the full extent of historic assets such that development could have potential negative impact with reference to proximity to the Conservation Area which straddles the A448 (page 111).
- 2.74 For the reduced Area 4 the assessment states ***"the high potential score of the Historic Character Zone (HECZ147c) means there is a high probability that high quality historic assets in particularly alluvial deposits survive in the zone"*** and ***"further surveys would be required to examine the full extent of historic assets in this location however a neutral score is considered most appropriate for this area"***.
- 2.75 RPS considers that these assessments do not justify a neutral score and that under Criterion E4 both should score '-'.
- 2.76 It is accepted that the relationship between the proposed Brockhill West development within Area 5 and the Hewell Grange heritage assets merits a negative score. Clearly, the relationship between development and the assets can be managed through the use of appropriate buffers and mitigation and design of the development. The summary that ***"development on any part of Area 5 would have significant negative impact on the setting of these designated heritage assets"*** is refuted by CgMs, FPCR and RPS. It is therefore appropriate to consider whether overall it is reasonable to conclude a '--' score is merited against the scoring methodology that ***"the proposed development detracts significantly from the achievement of the objective"***. On balance, despite the ability to acceptably mitigate the impact, RPS concludes that comparatively the score of '--' is merited for Area 5 and Brockhill West on this criterion, notwithstanding the ability remains to mitigate any adverse impact appropriately.
- 2.77 The CgMs and FPCR documents from May 2013 set out the reasons why the Bromsgrove District Council Conservation Hewell Grange Estate: Setting of Heritage Assets Assessment 2013 is not considered to be robust and does not substantiate a heritage against the selection of the Brockhill West site for cross-boundary allocation as a strategic site in the BRLP4 and BDP. The impact of proposals on the setting of the Heritage Assets can be appropriately and effectively mitigated.

Flooding Risk

- 2.78 The HGDS refers to the Batchley Brook having a flood plain within the Brockhill West area. There are references too to a flooding issue to the west of Dairy Lane on the eastern edge of the site. The report recognises that balancing ponds provided in association with the Brockhill development **"has reduced the scale of flooding"** (HGDS para 6.2.36). The report does not conclude in the relevant section that flooding risk is a constraint to appropriate development at Brockhill West.
- 2.79 Indeed, the work undertaken by RPS Engineering has indicated the extent of the Batchley Brook flood plain, the extent of attenuation areas that would be required to ensure that no more than greenfield equivalent run-off occurs after development and the location of these areas within Flood Zone 1 land, and the downstream nature of the site relative to the Hewell Park Lake SSSI. In practice, the well-designed SuDS proposals for the area embodied in the Concept Masterplan work will have the benefit of further managing the surface water drainage in the Batchley Brook catchment to the benefit of residents on Dairy Lane who suffered from greenfield run off from the valley in the absence of any attenuation areas. The recorded value of the Brockhill development balancing ponds will apply equally to new provision at Brockhill West which betterment to the wider area as a consequence.
- 2.80 All proposed built development at Brockhill West would be in Flood Zone 1.
- 2.81 RPS submitted flood risk assessment work for Brockhill West in October 2010 and January 2011.
- 2.82 It is apparent from HGDS paragraph 6.1.36 that the equivalent work was not available to the authors of the report for the Area 4 Foxlydiate land where it states that **"complete flooding data for Area 4 is not available"** and **"it is considered that development on flood zone 3 can be avoided and incorporated in to the GI network to also protect biodiversity"** and **"Sustainable Urban Drainage Systems could potentially be incorporated into any new development to manage surface water run off"**.
- 2.83 RPS considers the comparison between the areas, once work has been completed, can be expected to show that both areas can manage surface water and flooding risk effectively.
- 2.84 It is in this context that RPS refutes the Sustainability Appraisal scoring of Brockhill West as '-' whereas Area 4/Foxlydiate as Area 4 reduced is recorded as '-' in the context of flood risk (Criterion E6).
- 2.85 On Flooding Risk impact, it is considered both sites merit a neutral score of '0'. Certainly, there is no case for an advantage being recorded for Area 4/Area4 Reduced.

Efficient Use of Land Resources

- 2.86 The main HGDS report, as identified above, concludes that agricultural land impact is a broadly neutral comparative issue. The E2 criterion relates to ensuring **"efficient use of land through safeguarding of mineral reserves, the best and most versatile agricultural land, land of Green Belt value, maximising of previously developed land and reuse of vacant buildings where this is not detrimental to open space and biodiversity interest"**. This makes no reference to heritage assets which are covered by Criterion E4. Yet the Area 5 assessment under Criterion E2 refers extensively to the historic asset and the potential for development to affect the setting of the RPG. By any objective measure that does not fall within the scope of Criterion E2. The text refers to the

eastern and south-eastern parts of Area 5 where the Brockhill West proposal is focused to be of lesser likelihood of containing Best & Most Versatile Agricultural Land.

- 2.87 RPS strongly contends that the Green Belt impact of Area 4 is substantially greater than for Brockhill West and therefore the Area 4 score should be '-' and Area 5 score '-' due to the loss of greenfield land under criterion E2. The reduced capacity Area 4 land as shown on page 218 of the HGDS (ie land for some 1,000 dwellings) would have less Green Belt impact than the wider Area 4 but includes a higher proportional likelihood of BMV land. Overall, it is considered that the Reduced capacity Area 4 should score '-' on Criterion E2.

Sustainability Summary

- 2.88 The table below resents the HGDS SA scoring and RPS's scoring of Area 4, Area 4 Reduced Capacity and Brockhill West within Area 5. This demonstrates that the HGDS has scored Brockhill West inappropriately lower than Area 4 in particular on a range of criteria which significantly distorts reasonable conclusions that can be drawn.

SA Criterion	Area 4 HGDS	Area 4 Reduced HGDS	Area 5 HGDS	Area 4 RPS	Area 4 Reduced RPS	Area 5 RPS
S1	2	2	2	2	2	2
S2	1	1	1	0	1	1
S3	0	1	1	0	1	1*
S4	1	1	1	1	1	1
S5	1	2	2	1	1	2
S6	0	0	0	0	0	0
Sub-total	5	7	7	4	6	7
E1	-2	-1	-2	-2	-1	-1
E2	-1	-1	-2	-2	-1	-1
E3	-1	-1	-1	-1	-1	-1
E4	0	0	-2	-1	-1	-2
E5	1	1	1	1	1	1
E6	-1	-1	-2	0	0	0
E7	1	1	1	1	1	1
E8	0	0	0	0	0	0
E9	1	1	2	1	1	2
Sub-total	-2	-1	-5	-3	-1	-1
EC1	0	0	0	0	0	0
EC2	0	0	0	0	0	0
EC3	0	1	1	0	1	2
Sub-total	0	1	1	0	1	2
Total score	3	7	3	1	6	8

- 2.89 It is unclear to RPS on an objective assessment of the locations against the sustainability criteria why the sustainability appraisal accompanying the HGDS presents a lower score for Area 5 Brockhill West than Area 4 and Area 4 Reduced.

Sustainable Option Appraisal

- 2.90 It is noted that several options were considered in the HGDS Sustainability Appraisal to accommodate at least 3,400 dwellings. None of the options included a combination of the three highest scoring sites (excluding Area 14 which was rejected on Green Belt purposes grounds) of Areas 6 (highest score – Brockhill East), Brockhill West Area 5 and Area 4 Reduced Capacity

(adjusted to include additional land immediately to the north). Respectively these areas in Bromsgrove can provide some 670, 930 and 1,600 dwellings totalling 3,200 dwellings. In addition, land in Redditch Borough at Brockhill West can accommodate at least 200 dwellings to achieve the identified level of provision of 3,400 on cross-boundary sites (in addition to the Brockhill East land within Redditch Borough identified in the current RBLP4 proposals).

- 2.91 This would have scored the highest combined sustainability score and is also able to be delivered within the Plan period to 2030. In contrast, there is significant doubt that over 1,600 homes could be completed in this period within Area 4 by 2030, placing at risk some 1,200 dwellings or about 19% of the identified Redditch related requirement.

Concluding Comment on Site Suitability

- 2.92 Separate evidence as previously provided to the Local Planning Authorities has demonstrated the suitability of Brockhill West as a sustainable location for development. The review of the site on a comparative basis with Area 4 and Area 4 Reduced Capacity demonstrates Brockhill West performs very well. The only criterion on which a lower score is made relates to heritage issues. This is outweighed by other areas of sustainability assessed advantages.
- 2.93 The Heritage Assets impact assessment work refutes the analysis and conclusions of the Bromsgrove District Council Conservation *Hewell Grange Estate: Setting of Heritage Assets Assessment 2013*.
- 2.94 It is concluded in the absence of any overriding demonstrable heritage concern that the Brockhill West site should have been a favoured location for Redditch-related growth. On this basis the site should be introduced into the BRLP4 and BDP for comprehensive cross-boundary development in accordance with masterplanning and site assessment work which has been provided within a deliverable spatial strategy comprising Areas 4 (part – extended Reduced Capacity area), 5 and 6.

3 AVAILABILITY

- 3.1 The Brockhill West land is within four ownerships, one of which is Persimmon Homes who acquired Birchensale Farm in the 1980s on which the Brockhill Development was largely constructed. The other ownerships relate to Oxstalls Farm, Tack Farm and a small rectangular land area in the south east of the site, all of which have been assembled by Miller and SRD. There are no tenants or occupiers of the land which would affect its development. The site has been assembled and does not require public funding to achieve delivery of the development.
- 3.2 The land is controlled by developers and housebuilders Persimmon and Miller which are both nationally significant house-builders. Both companies are committed to working together to deliver a comprehensive sustainable development west of Brockhill, Redditch in the event that planning permission is granted. The landowners are also committed to delivering a sustainable urban extension at Brockhill West on the site in conjunction with the developers and the local planning authorities following the establishment of the principle of development.
- 3.3 There are no ransom strips or any legal constraints in relation to access or land availability which would affect development on the site. Indeed, Persimmon's approach to the development of the Brockhill area specifically provided for the potential delivery of additional cross-boundary development with access roads available linking directly to existing junctions on the Brockhill Drive distributor road which have capacity to serve additional development. This will enable the development to be effectively integrated from the outset. In addition, a new principal access to the area can be established off Brockhill Drive from the south close to the existing Foxlydiate junction on A448. This will provide convenient access to the strategic road network linking to neighbouring towns and regional and national destinations.
- 3.4 As there are no legal ownership or availability constraints and the necessary access arrangement exist for part of the site, the development could commence in the early part of the plan period and significantly boost the supply of housing on a cross-boundary basis from an early date.

4 ACHIEVABILITY

Brockhill West

- 4.1 As explained in Section 2, RPS assembled with the wider Consultant team a portfolio of technical information demonstrating the site analysis work that has been undertaken of Brockhill West whereby the constraints in the area have been identified and mapped and their implications understood. Alternative Concept Masterplans were prepared showing how the area could be developed either as a mixed use scheme incorporating an element of employment, in the south part of the site on Brockhill Drive within Redditch Borough, or as an essentially residential development. In both cases the development was proposed to be supported by a local centre (Redditch District Centre) and a new First School. The latter facilities would be proposed at a scale to serve the new development to avoid any threat to the Batchley Local Centre, noting also that the Brockhill development of 1,300 dwellings has a good network of open space provision but has only limited social infrastructure assets.
- 4.2 The portfolio, as explained in Section 2, was prepared in the first instance for the wider cross-boundary Brockhill West site in October 2010. It was updated in January 2011 to show how land in Redditch Borough only could be brought forward separately or as a much earlier phase in the event that cross-boundary co-operation precluded a comprehensive approach to delivery.
- 4.3 It is noted that the Redditch and Bromsgrove Plans are now aligned closely in plan period and preparation timescales which will facilitate the original portfolio approach of a comprehensively planned urban extension at Brockhill West. Indeed, Persimmon, Miller and SRD advocate a very similar approach to that proposed in the two Plans for Brockhill East where there are aligned contiguous land use proposals on a cross-boundary basis which can best be delivered through a single comprehensive masterplan led approach rather than as two separate allocated sites which happen to be adjoined.
- 4.4 The scale of the development at about 1,000 to 1,100 dwellings is such that it can support a 1 form of entry First School. This is ideal for community building and establishing patterns of social interaction. The school building is also proposed to have a dual use function outside school hours where wider community use of the hall and other facilities would be made available. It is proposed that these arrangements would be secured through the grant of planning permission so that the operators of the school would include the necessary management arrangements in their bids from the outset. If the school were to be run by the Education Authority ultimately, the same principles would also apply.
- 4.5 As the whole area has been assembled, the scope exists for building to commence on the edge of the town in the east and southern parts of the site and for advance landscaping works to proceed within the extensive planned green infrastructure for the area. Such works would include management of the retained open buffer area adjacent to the Hewell Grange Conservation Area and Registered Park and Garden.

Delivering the Benefits of the Development

- 4.6 The principal benefits of Brockhill West for development relate to site's ability to both integrate extremely well with the existing Brockhill development and deliver new homes from an early date

supported by local facilities, a new First School and very extensive green infrastructure. An attractive long term green edge to Redditch would be established, finishing off the Brockhill urban extension on its western side.

- 4.7 The development would be a scale to support enhanced public transport services, extending the existing very high frequency service that exists in the neighbouring Batchley area.
- 4.8 The site is very well related to the town centre, public transport interchange and employment areas in the north of the town, while also having good accessibility to the strategic road network.
- 4.9 The site is very well contained in the wooded estates landscape and the proposed green infrastructure strategy can reinforce the key qualities of the landscape through appropriate new woodland planting.
- 4.10 The development is not dependent on major new road construction. Physical infrastructure requirements can be provided in parallel with the construction of new homes from an early date.

Site Selection and De-Selection

- 4.11 During the extensive period of positive engagement by Miller, Persimmon and SRD in the Redditch and cross-boundary site discussions with the Local Planning Authorities, the value of the Hewell Grange heritage assets was never raised as a constraint to the delivery of an urban extension at a strategic scale at Brockhill West until the end of 2012 and the publication of the Housing Growth Development Study report in January 2013.
- 4.12 In 2011, Redditch Borough Council published its Revised Preferred Draft Core Strategy for Redditch which included land in the Borough at Brockhill West as a strategic development site. Further, the Borough Council included the site in its immediate 5 year housing supply delivery period for 150 dwellings between 2012 and 2017 in the 2012 SHLAA given its lack of constraints notwithstanding its Green Belt status.
- 4.13 The de-selection of the site has been explained implicitly in the relevant documentation as relating to a conclusion that, despite there being no objection to the Redditch Borough Brockhill West proposal in the Revised Preferred Draft Core Strategy by either English Heritage or Bromsgrove District Council on heritage impact grounds, the development of the site would have an unacceptable impact on the Hewell Grange Conservation Area and Registered Park and Garden.
- 4.14 It is significant that Area 5 was identified as not being subject to constraints such that it should be excluded after the initial assessment and indeed that the area was taken forward into the Focussed Area Appraisal stage in section 6 of the report.
- 4.15 It should be noted, however, that the HGDS does not conclude that the entire extent of Area 5 is unsuitable for development and that the eastern part could be developed acceptably in the authors' view. Although, Miller, Persimmon and SRD do not accept the overall conclusions of the HGDS for the reasons explained in Section 2 above, they note the conclusion that land east of Tack Farm including the entirety of the land within Redditch Borough at Brockhill West is a potential development area (Figure 10 on page 120 refers).
- 4.16 The issue of contention appears to be how much of Area 5 is suitable for development rather than whether it is suitable. There appears to be an acceptance that development of the site is achievable and this leaves the question whether it should be allocated for development and if so on what basis.

Foxlydiat

- 4.17 RPS supports the principle of development on the north eastern part of the Area 1 site to the extent of some 1,550 to 1,600 dwellings which could be delivered over the full period to 2030.
- 4.18 This is based on an understanding that the land has been assembled and the necessary infrastructure can be delivered viably without undue delay.
- 4.19 RPS has given consideration to the realism of the Foxlydiat proposal in terms of delivery and this is considered further in Section 5 below. In brief, it is not a realistic proposition that development at Foxlydiat could deliver 2,800 dwellings by 2030. The initial planning and infrastructure provision cannot realistically be expected to facilitate the first delivery of homes before 2017. Allowing for even three or four developers on the site, at peak production, RPS does not consider that more than an average of 120 dwellings could be completed on the site annually after an initial starting up stage.
- 4.20 The HGDS at paragraphs 6.1.39 to 40 identifies there is significant uncertainty over the timeframe for serving the Foxlydiat site with satisfactory and sustainable foul water drainage. The response to the consultation in April/May 2013 from Severn Trent Water was critical of the selection of Foxlydiat as a preferred location for major development due to the complexity of the assessment required to determine the most appropriate foul water drainage solution and its associated costs. Paragraph 6.1.40 identifies that infrastructure delivery in this context may be a lengthy process which could put delivery of even 1,550 to 1,600 dwellings at significant risk.

Conclusion

- 4.21 As demonstrated above, the proposed urban extension at Brockhill West can provide a range of benefits for the area, to enhance facilities and services including significant new green and social infrastructure to the area, while also delivering an attractive development which will, in conjunction with other appropriate sites, assist in meeting Redditch's housing needs for the plan period.
- 4.22 This can be achieved without causing substantial or unacceptable harm to any of the identified heritage or nature conservation assets in the area as demonstrated in the accompanying evidence prepared by CgMs and FPCR (2010/11 Brockhill West Portfolio and reports prepared by CgMs and FPCR in May and July 2013).

5 DELIVERY AND PHASING

Phasing

- 5.1 The site has been assembled and does not require public funding to achieve delivery of the development. There are also no ownership or other constraints to delivery, as previously identified. Therefore, construction of the Brockhill West development is able to commence in the early part of the plan period through co-operation between the developers and the Local Planning Authority.
- 5.2 Brockhill West enjoys a high level of existing infrastructure which can facilitate its early delivery including points of access from the east via Lily Green Land and Apple Tree Lane as well as a frontage on to B4184 Brockhill Drive to the south.
- 5.3 Recreational facilities will be delivered in balance with the housing delivery.
- 5.4 It is proposed that bus services would be extended into the site as soon as it practical and supported by the operator.
- 5.5 The First School would be provided at an agreed stage of the development to avoid both under-provision of permanent places to serve the development for a long period and also attracting children from other catchments by providing places too early.

Trajectory

- 5.6 At the request of the Local Planning Authorities in August 2013, RPS provided an indicative delivery programme for the site. This is reproduced in the table below on the basis of 1,100 dwellings:

Date	Redditch Borough	Bromsgrove District	Total	Cumulative Total
2015-2016	40	0	40	40
2016-2017	80	20	100	140
2017-2018	60	40	100	240
2018-2019	40	60	100	340
2019-2020	0	100	100	440
2020-2021	0	100	100	540
2021-2022	0	100	100	640
2022-2023	0	100	100	740
2023-2024	0	100	100	840
2024-2025	0	100	100	940
2025-2026	0	100	100	1040
2026-2027	0	60	60	1100
2027-2028	0	0	0	1100
2028-2029	0	0	0	1100
2029-2030	0	0	0	1100
	220	880	1250	1100

- 5.7 As indicated in preceding sections, Redditch Borough Council has identified land in the Borough at Brockhill West as suitable as a strategic development site in the Revised Preferred Draft Core Strategy for Redditch and included the site in the immediate 5 year housing supply delivery period for 150 dwellings between 2012 and 2017 in the last two years.

- 5.8 It is therefore recognised that the site is in large part deliverable (within 5 years) and, at the proposed scale, readily developable in the plan period to 2030 as demonstrated in the table above. Development can proceed in parallel in both Redditch Borough and Bromsgrove District during the early implementation stages, with development continuing in Bromsgrove District.
- 5.9 In contrast, it is considered that a development of the order of 1,500 to 1,600 dwellings is capable of delivery within the Foxlydiat proposed allocation area by 2030 and that this can be accommodated north of Cur Lane and east of the north/south stream tributary. With first occupations capable of delivery in 2017/18 (assuming an expeditious approach) and commencing at a rate of 80 dwellings per year in 2017/18, in parallel with development at Web Heath increasing to an average of 140 per year between 2018/19 and 2029/30, the Foxlydiat site is considered capable of delivering a maximum of about 1,600 dwellings by 2030.
- 5.10 The land is not controlled by a house-builder and time will be needed to promote an outline planning application, negotiate a planning permission with associated S106 planning obligation and then dispose of the first residential phase(s) to house-builders, procure reserved matters approvals and provide the initial infrastructure capable of serving new housing. It is likely that a period longer than the 29 months from November 2013 identified above will be required to complete that process.
- 5.11 The implied rate to deliver 2,800 dwellings between 2016/17 and 2029/30, assuming even production throughout, would require completions of 200 dwellings per year for the 14 year period. There is no record of housing delivery on a privately developed strategic site in Bromsgrove or Redditch at a rate even close to this that has been sustained over a significant period. It is noted that the published supporting evidence prepared on behalf of the site promoters does not include a delivery programme for the site.
- 5.12 The table below shows the delivery profile of the Brockhill development, the most recent large scale residential development in the area, which totalled 1,290 dwellings and was delivered over a 10 year period at an average overall rate of about 130 dwellings per year. It was the single main strategic site at Redditch over that period delivering almost 40% of all housing completions within the 10 year life of construction. The Foxlydiat site would be under development in parallel with other large urban extension sites, particularly at Brockhill East.

Years	Brockhill Completions	Brockhill Cumulative Completions	Total Redditch Borough Completions	Brockhill % of Total Redditch Borough Completions
1996-1997	71	71	262	27.1
1997-1998	154	225	380	40.5
1998-1999	126	351	284	44.4
1999-2000	259	610	472	54.9
2000-2001	194	804	483	40.2
2001-2002	90	894	233	38.6
2002-2003	104	998	284	36.6
2003-2004	174	1172	419	41.5
2004-2005	111	1283	288	38.5
2005-2006	7	1290	262	2.7
1996-2006	1290	1290	3367	38.3

Source: RBC Housing Monitoring

- 5.13 The NPPF requires development plans to be realistic and deliverable. RPS concludes that even if the full extent of the Site 1 Foxlydiat development were suitable in spatial planning terms, an allocation of this site would not yield more than some 1,600 dwellings by the end of the Plan period.

In delivery terms, the plan would under-deliver to the extent of some 1,200 dwellings which broadly equates to the capacity of the Brockhill West site, where any shortfall could appropriately be accommodated on land in Bromsgrove District on the western edge of the existing Brockhill East/Brockhill strategic site development area (Site 2).

Planning Application

- 5.14 A planning application could be submitted for development of the Brockhill West area in 2014 including a first detailed phase facilitating first completions and occupied homes in 2015/16.

Conclusion

- 5.15 The Brockhill West site, being controlled by house-builders and having access already available for an initial site release, could come forward for development as explained above commencing in 2015/16.

6 CONCLUSIONS AND RECOMMENDATIONS

- 6.1 RPS Planning & Development is retained by Miller Strategic Land (Miller), Southern & Regional Developments (SRD) and Persimmon Homes South Midlands (Persimmon) to represent their interests in development of a Sustainable Urban Extension or Strategic Site to the north west of Redditch at Brockhill West.
- 6.2 This statement has demonstrated the comparative suitability of the Brockhill West site for residential development to meet Redditch-related growth needs, its availability and its deliverability within the Plan period to 2030 as part of a coherent spatial strategy for the town.

Suitability

- 6.3 Separate evidence in the form of a portfolio of technical assessments was previously provided to the Local Planning Authorities in 2010 and 2011 which had demonstrated the suitability of Brockhill West as a sustainable location for development. This has been augmented with further information on the absence of viable mineral reserves (by D Symes) and the potential for harm on the Hewell Grange Heritage Assets (CgMs and FPCR).
- 6.4 RPS has reviewed the comparative assessment of Brockhill West (Area 5 in part) with Area 4 and Area 4 Reduced Capacity presented in the Local Planning Authorities' Housing Growth Development Study (January 2013). RPS's assessment demonstrates Brockhill West performs very well. The only criterion on which a lower score is made relates to heritage issues. This is not overriding and is outweighed by other areas of sustainability assessed advantages.
- 6.5 The Heritage Assets impact assessment work by CgMs and FPCR refutes the analysis and conclusions of the Bromsgrove District Council Conservation *Hewell Grange Estate: Setting of Heritage Assets Assessment 2013*. The latter is concluded not to be a sound basis on which to exclude the Brockhill West site from consideration.
- 6.6 It is concluded, in the absence of any overriding demonstrable heritage concern, that the Brockhill West site should have been a favoured location for Redditch-related growth. On this basis the site should be introduced into the BRLP4 and BDP for comprehensive cross-boundary development in accordance with masterplanning and site assessment work which has been provided within a deliverable spatial strategy comprising Areas 4 (part – extended Reduced Capacity area), 5 and 6.

Availability and Deliverability

- 6.7 The land is controlled by developers (Southern & Regional Developments) and house-builders Persimmon and Miller which are both nationally significant house-builders. The companies are committed to working together with the landowners and the local planning authorities to deliver a comprehensive sustainable development.
- 6.8 There are no legal ownership or availability constraints and the necessary access arrangements already exist for part of the site. The development could commence in the early part of the plan period and significantly boost the supply of housing on a cross-boundary basis from an early date, commencing in 2015/16.

APPENDIX 1 – SITE LOCATION PLAN



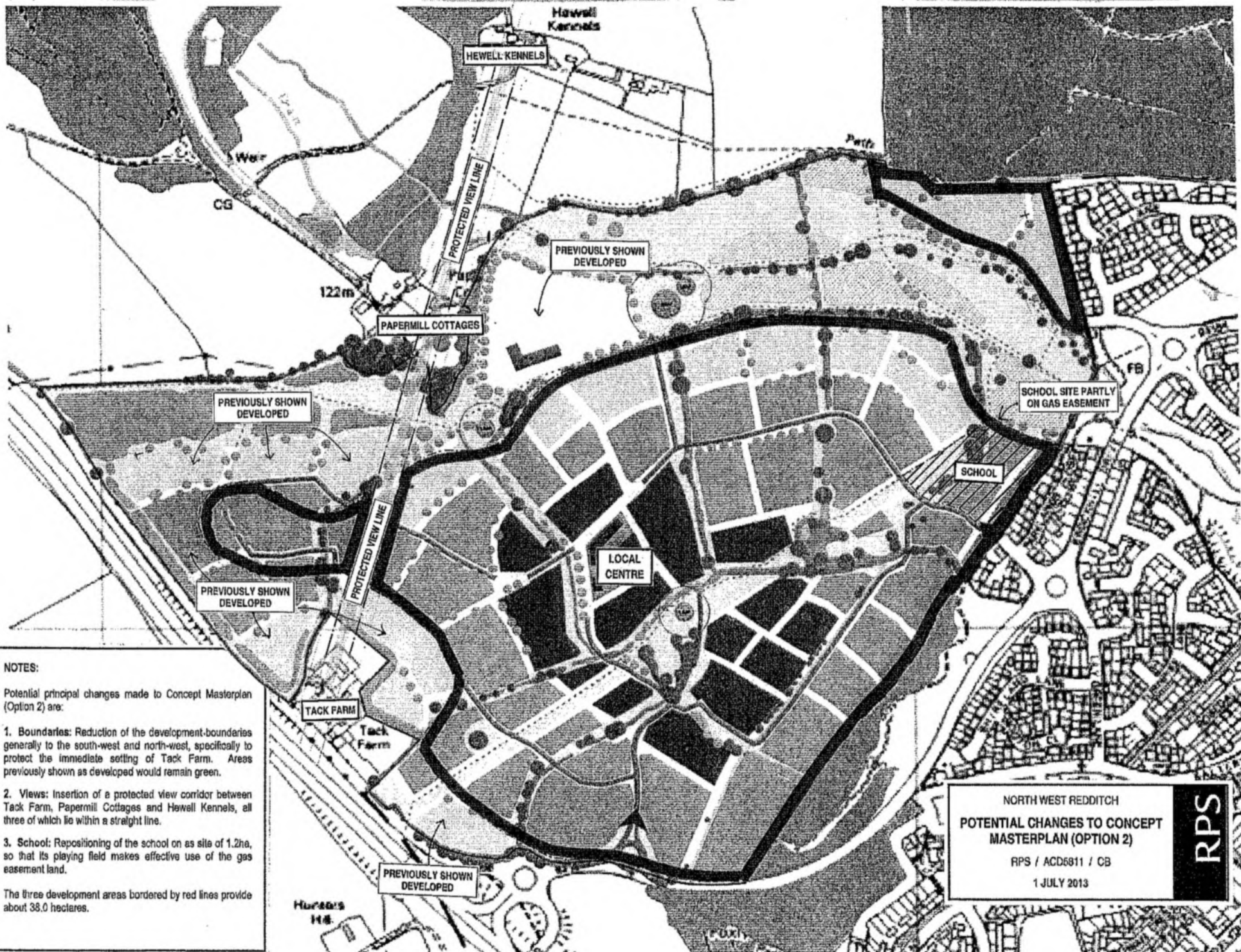
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REF: JBB7661	CHECKED BY: MS
CLIENT: Miller Homes Ltd	DATE CHECKED: 14/05/13
DATE: May 2013	REVISION: 00
STATUS: Final	PREPARED BY: JP



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APPENDIX 2 – MASTERPLAN



NOTES:

Potential principal changes made to Concept Masterplan (Option 2) are:

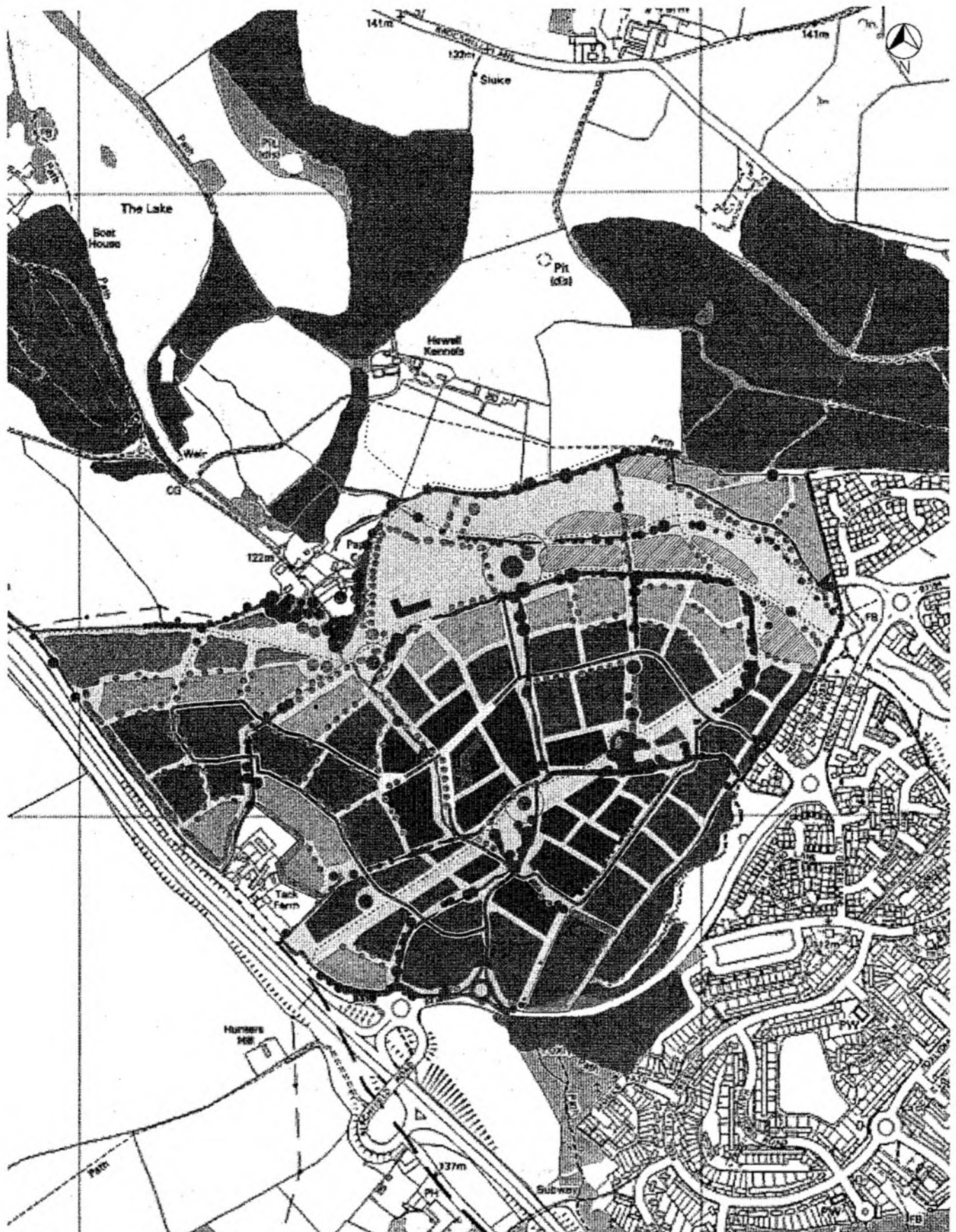
- Boundaries:** Reduction of the development boundaries generally to the south-west and north-west, specifically to protect the immediate setting of Tack Farm. Areas previously shown as developed would remain green.
- Views:** Insertion of a protected view corridor between Tack Farm, Papermill Cottages and Hewell Kennels, all three of which lie within a straight line.
- School:** Repositioning of the school on as site of 1.2ha, so that its playing field makes effective use of the gas easement land.

The three development areas bordered by red lines provide about 38.0 hectares.

NORTH WEST REDDITCH
**POTENTIAL CHANGES TO CONCEPT
 MASTERPLAN (OPTION 2)**
 RPS / ACD6811 / CB
 1 JULY 2013



North West Redditch : Concept Masterplan (Option 2)



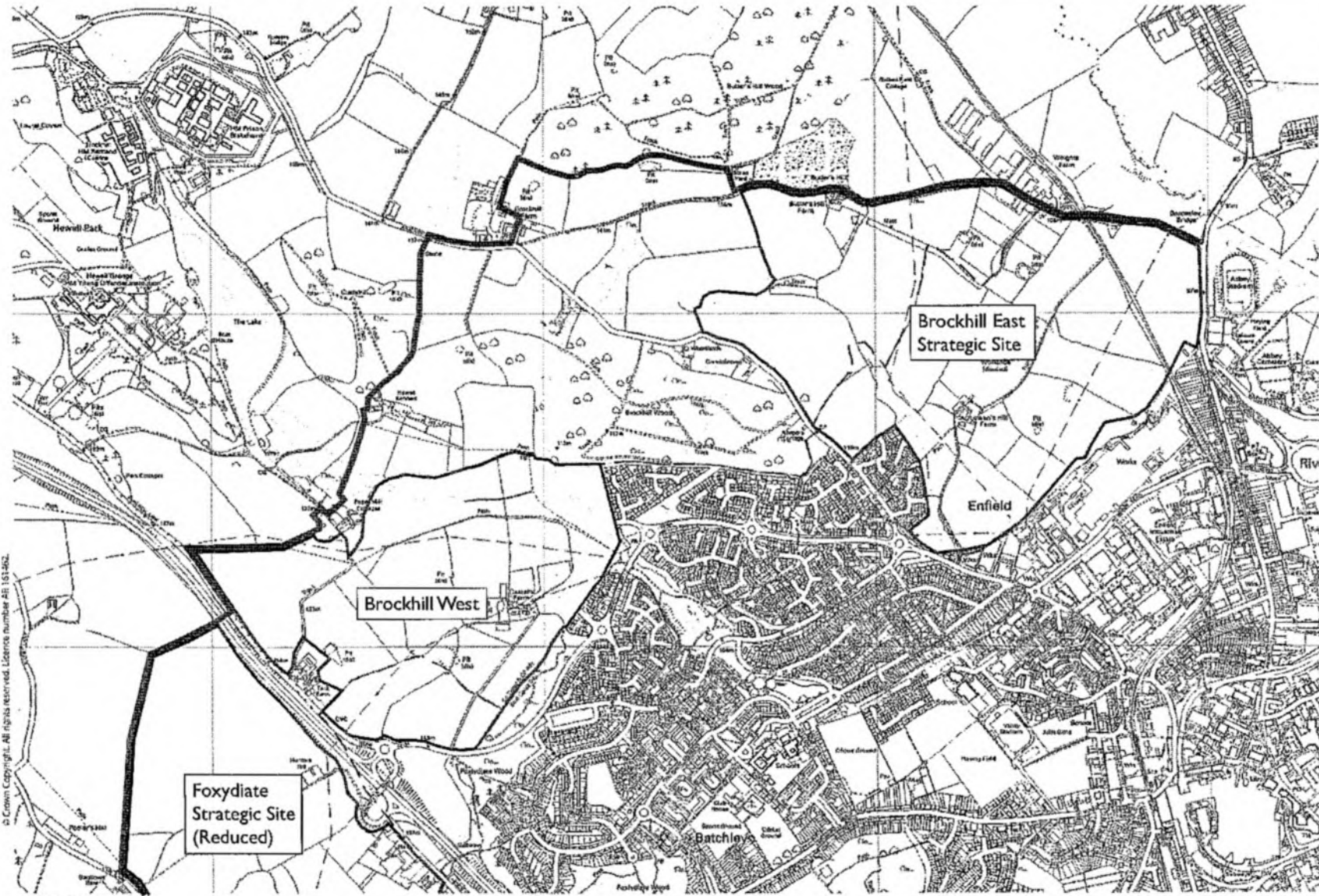
- | | | | |
|------------------------------|--|-------------------------------------|---|
| Site Boundary | Mixed use Local Centre (shaded indicates key features) | Existing Trees (shaded only) | Public Right of Way (including footpaths and new roads) |
| Residential - Higher Density | Public Open Space / Amenity Space | Existing Hedgeprows (shaded only) | Vehicle Access Points |
| Residential - Medium Density | Local / Highground Children's Play Area | Proposed Tree Planting / Hedgeprows | Sub-urban Loop Road / Main Street |
| Residential - Lower Density | Industrial/Drainage Basin / Existing Water Features | Existing Woodland | Existing Trench / Proposed Trench / Subway |
| Primary School | Shared Surface Spaces / Local Streets | Proposed New Woodland | |

project: North West Redditch
 site: Concept Masterplan (Option 2)
 clients: Miller Homes / Persimmon Homes / Southern & Regional Developments Ltd.
 job no: ACD9811 org no: 500_002_2 rev: A
 drawn: JRP/T date: 20.09.2010 scale: NTS
 crd: JR

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APPENDIX 3 – RECOMMENDED BROCKHILL GREEN BELT BOUNDARY



KEY

- Green Belt Boundary recommended in Redditch Green Belt Review December 2009 (RPS/FPCR)

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SCALE: NTS

REF: JBB7661 CLIENT: Persimmon et al. DATE: November 2013 STATUS: Final	CHECKED BY: MS DATE CHECKED: 11/11/13 REVISION: 00 PREPARED BY: JP	<div style="float: right; border: 1px solid black; padding: 2px; background-color: black; color: white; font-weight: bold;">RPS</div> <p style="font-size: small; margin-top: 10px;">Highfield House, 5 Ridgeway, Quinton Business Park, Birmingham, B32 1AF T: 0121 213 5500 F: 0121 213 5502 W: www.rpsgroup.com</p>
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