

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)

Wm Morrison Supermarkets plc

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

Page: 29	Paragraph:	Policy: BDP5A
Policies Map:	Other document:	

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

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

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

Policy BDP5A sets out the Council's vision for the Bromsgrove Town Centre Expansion Sites. It indicates that a mixed-use urban expansion is proposed across three sites and will comprise approximately 2,106 dwellings, 5 hectares of employment land, local centre(s), retail and community facilities.

The Policy notes that 'BROM2' will contain a minimum of 1,300 dwellings and (inter alia) a local centre that provides a mix of retail and other Class A uses. It goes on to state that 'BROM3' will also include 'small scale local retail'.

There is no indication as to the maximum retail floorspace proposed within the Bromsgrove Town Centre Expansion sites.

We note that paragraph 8.201 of the document indicates that an update to the 2010 Retail Study is expected in 2013, and that this is likely to suggest 'limited need for further convenience retailing floorspace' over the Plan period. The 2013 Retail is not yet available, and has not been presented as part of the Council's Evidence Base to support the District Plan document.

The latest 2010 Retail Study Update identifies no capacity for additional convenience goods floorspace in Bromsgrove up to 2025. In this regard, given that the latest Retail Study identifies no requirement for convenience goods floorspace, we consider it necessary for the LPA to identify a maximum limit of floorspace to be proposed as part of the Bromsgrove Town Centre Expansion sites.

Notwithstanding this, the Council appears to rely on the "likely" findings of the 2013 Retail Study, which has not yet been made available to view. In this regard, we do not consider that the District Plan is based on an up to date evidence base in terms of retail development, and should therefore be deemed unsound in its current form.

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)

We consider it necessary for the LPA to identify a maximum limit of floorspace to be proposed as part of the Bromsgrove Town Centre Expansion sites. This should be based upon the findings of an up-to-date Retail Study.


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)

Signature: 	Date: 11/11/13
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