PART B: Your Representation

For official use only

Please use a separate form for each representation

Name of Person / Organisation (if appropriate) making representation:

Name:	**Mrs Anne Dyson Parish Clerk**
Organisation	**Bentley Pauncefoot Parish Council**

1. Which Proposed Main Modification to the Submission Bromsgrove District Plan/ Borough of Redditch Local Plan No.4 does your representation relate to? (Please indicate which Plan your response relates to as appropriate)	
Proposed Main Modification Number	**MM 20**

2. Do you consider the Proposed Main Modification to be:		
A. Legally compliant?	Yes ☐	No ☐
B. Sound?	Yes ☐	No ✓

3. If you consider the Proposed Main Modification to be unsound please identify which test of soundness your comments relate to? (tick all that apply)	
Not positively prepared	✓
Not justified	✓
Not effective	✓
Not consistent with national policy	✓

As also set out in the accompanying Guidance Notes on making representations to the Proposed Main Modifications these are the tests of soundness to which your comment(s) should relate:

Positively prepared – the Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;

Justified – the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate, robust and credible evidence base;

Effective – the Plan should be deliverable over its identified time period and based on effective joint working on cross-boundary strategic priorities; and

Consistent with national policy – the Plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

Please use a separate sheet for each Proposed Main Modification response

4. Please give details of why you consider the Proposed Main Modification is not legally compliant or is unsound. Please be as precise as possible. If you wish to support the Proposed Main Modification please also use the box below to set out your comments.

Your representation should relate only to the current Proposed Main Modifications. Please be specific as to which part of a Policy, Proposal or paragraph no. you are referring to.

Preamble:-

The barrister employed by Bromsgrove and Redditch Councils is of the opinion that the information placed before the Inspector is consistent with and not in conflict with the legal requirements on SEA. His, at times, overly subjective judgment is that a comprehensive and robust assessment of alternative sites (for the accommodation of Redditch's excess housing needs) has been carried out and the correct procedure followed. Our continuing concerns about bias, lack of accurate information and flawed processes are given little weight. Our response to these MMs is made without prejudice to our previously expressed belief that the plan to develop a SUE at Foxlydiate is inherently unsound.

Comment:-

Although we have been asked to comment on each MM individually six of them are interrelated; they are MM18, 20, 22, 24, 26 and 30. These modifications emphasize the links between planning for Bromsgrove's own housing needs and those of the wider area in and around southern Birmingham. It is admitted that Bromsgrove's long term housing target will not be achieved until a Green Belt review and a further Local Plan review (stimulated by GBSLEP work) has occurred, plus the monitoring of the delivery of other housing sites within the District.

The broad reference, in MM20, to Birmingham's housing requirements ("the need for housing is not immediate") is deleted, which implies that the necessary GBSLEP details will emerge sooner rather than later in an undefined time span. Only then will the work be undertaken in relation to Bromsgrove's remaining housing needs though the general area considered appropriate to accommodate Birmingham's requirements has already been identified. (MM26).

One might have expected that the delivery of 2300 houses within its own district would have been given a higher priority by Bromsgrove than the accommodation of the housing needs of Birmingham and also of Redditch. As it stands, the gap between the total number of dwellings needed by Bromsgrove itself and site availability remains unchanged despite the opportunities presented by the present Local Plan Review.

The six main modifications together (MM18, 20, 22, 24, 26 and 30) indicate and re-state an appreciation of the necessary interrelation and interaction between Bromsgrove and Birmingham as regards the satisfaction of housing needs. It would seem to be a logical extension of this interaction via the GBSLEP to include consideration of the parallel needs of Redditch within the overall strategic planning process associated with the Greater Birmingham area so that an effective and justified strategy for meeting the development needs of the area could emerge.

5. Please set out what change(s) you consider necessary to make the proposed Main Modification legally compliant or sound, having regard to the test(s) you have identified above. You will need to say why this change will make the proposed Main Modification legally compliant or 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.

Your representation should relate only to the current Proposed Main Modifications.

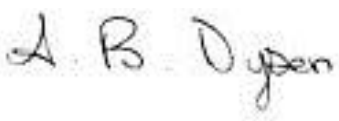
In order to stimulate effective co-operation and remove doubt, the MMs should include a more definite indication of the anticipated likely time frame.

Before committing itself to accommodating housing requirements from neighbouring areas the plans for the satisfaction of Bromsgrove's own needs should be made explicit.

Given that Redditch's immediate housing requirements can be accommodated outside the contentious Foxlydiate site, the GBSLEP work and associated reviews offer an opportunity to reassess site allocations and assumptions and consider how best to accommodate the town's housing needs within the compass of the wider strategic plan, rather than in isolation. This would have implications, not only for the wording of these MMs but also for the section relating to cross boundary development within the emerging Bromsgrove District Plan.

Declaration

I understand that all representations submitted will be made available for public inspection and will be identifiable to my name and organisation (if applicable).

Signature: 	Date: 11th September 2016