

## Introduction to the Draft Borough of Redditch Local Plan No. 4

KEY ISSUE: Introduction – Reference to the plan period

Sub Issues	Officer response
<p>Plan period is not explicitly stated until Policy 4 on page 26, helpful if set out earlier</p>	<p>The plan period is referred to in the second paragraph of the introduction on page one of the Plan. However it is agreed that it would be helpful if clarified.</p> <p><b>ACTION: Amend front cover to refer to plan period 2011 – 2030</b></p> <p><b>ACTION: Amend second paragraph of introduction to “The Local Plan sets out the state of Redditch as it is now within the Local Portrait. There is a Vision and Objectives that set out what Redditch will aim to be like by the end of the Plan period and these have responded to the issues and challenges in the Local Portrait. The Plan period started in 2011 when we first started to collect the evidence and ends in 2030 because the Plan must last for a minimum of 15 years from adoption.”</b></p>

KEY ISSUE: Introduction – sustainable development

Sub Issues	Officer response
<p>Describe and provide clear guidance on what sustainable development means. “sustainable development” in general means development that meets the social, economic and environmental needs of the present without compromising the ability of future generations to meet their own needs. The principles of sustainable development are:</p> <ul style="list-style-type: none"> <li>(i) living within environmental limits;</li> <li>(ii) ensuring a strong healthy and just society;</li> <li>(iii) achieving a sustainable economy;</li> </ul>	<p>This reference to Sustainability Development is sufficiently included within the accompanying Sustainability Appraisal to the Plan. In other respects sustainability is defined through the NPPF.</p>

(iv) promoting good governance; (v) using sound science responsibly.”	
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### Preparation Process

KEY ISSUE: Consultation process

Sub Issues	Officer response
Complain about consultation process and content	The consultation process has been undertaken for the statutory six weeks as set out in the Council’s Statement of Community Involvement. The content of the Plan is required to be compliant with the NPPF and set out local policies for guiding development.
Wording and punctuation errors	Wherever possible these have been picked up throughout the Plan

KEY ISSUE: Approval process

Sub Issues	Officer response
As both the consultation processes for Local Plan No.4, and the Redditch Growth Plan concurrently, there can have been no prior approval for the Redditch Growth Plan. Therefore, the evidence used to substantiate the policies in Local Plan No.4 is in fact invalid	The Redditch housing growth work has been in production for a number of months between both Councils. A number of briefing sessions were organised with Councillors from both Councils as the work progressed and then it progressed through Executive Committee and Full Council at Redditch and at Bromsgrove’s equivalent Councils. The Local Plan No.4 work has been progressing for a long period of time and has been discussed with Councillors well in advance of the Executive committee and Full Council giving its approval for consultation. Officers preparing both consultations are aware of the issues and the evidence in both plans therefore none of the content can be considered invalid.
Both consultations will have run for the same period of time, at the same time. It is therefore not possible for evidence in one of the proposals to inform policies and statements in the other.	As stated above the officers preparing both consultations are aware of the issues and evidence needed for both plans which are dependent on each other and have therefore needed to be informed by each other.

## Local Challenges

KEY ISSUE: Lack of Positivity

Sub Issues	Officer response
<p>In relation to District Centres, this section states:            “Redditch’s former New Town District Centres are suffering from safety, safety perception issues and other issues relating to the poor quality of the physical environment”. This could be stated more accurately and positively.</p>	<p>Noted that this can be amended to be more positive</p> <p><b>ACTION: Delete and replace with “Redditch’s former New Town District Centres face concentrations of crime and disorder adding to negative perceptions. The layout, design and physical environment at these locations have significantly contributed to these issues.”</b></p>
<p>In relation to Creating Safe and Attractive Places to Live &amp; Work, this section states: “Redditch suffers from a poor perception of crime, anti-social behaviour and the design of some areas can be improved to help reverse this perception.”            This could be stated more accurately and positively.</p>	<p>Noted that this can be amended to be more positive but wording elsewhere better fits the intention of these local challenges.</p>

KEY ISSUE: Local Challenges - Support

Sub Issues	Officer response
<p>EH welcomes the clear explanation of the challenges and their local context</p>	<p>Noted</p>

KEY ISSUE: Local challenges - Crime

Sub Issues	Officer response
<p>Local Challenge implies that design measures alone will redress the issues of crime and disorder. Whilst it can help reduce these issues, it can only fully reverse them if it is applied with supporting infrastructure put in place as well, in order to enable the delivery of active management measures by the emergency services and other</p>	<p>Whilst some of this suggestion is helpful to the local challenge it is difficult to refer to the implementation of infrastructure without an understanding of what that infrastructure might be. At this stage some parts of the suggested text is appropriate and consultation with stakeholders on the IDP report will be necessary to determine if</p>

<p>partners.</p> <p>Suggest the following amendment:          Creating safe, attractive <b>and low crime</b> place to live and work:          Redditch suffers from a poor perception of crime, anti-social behaviour. <b>The implementation of improved design, infrastructure and active management measures in areas can help reverse this perception.</b></p>	<p>reference to infrastructure is necessary. The suggestion to change the name of the section to include 'low crime' is not necessary as the 'safe' reference in the key theme covers this sufficiently.</p> <p><b>ACTION: Delete previous sentence under creating safe and attractive places to live and work and replace with “Redditch suffers from a poor perception of crime and anti-social behaviour. The implementation of improved design or designing out crime can help reverse this perception.”</b></p>
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## KEY ISSUE: Duty to Cooperate

<b>Sub Issues</b>	<b>Officer response</b>
Acknowledge that the Local Plan does not seek to identify any land within Malvern District to meet Redditch's development requirements.	Noted and it is agreed that this is not the case
Under the duty to cooperate the DC's in South Worcestershire wish to be consulted upon proposed submission draft	Noted the South Worcestershire Authorities are on the Council's database so will be consulted.
Request that a reference be made in the emerging local plan referring to the active participation by Redditch Borough Councils in the commissioning of research into the strategic housing needs study and towards the resolution of longer term growth issues within the wider Birmingham housing market through on-going work within the GBSLEP.	This reference is already included. Subsequent correspondence with BCC seeks to clarify intentions of this comment.
Required to demonstrate evidence of having effectively cooperated in plan issues when local plans are submitted	Agreed this is a requirement of the NPPF
Commends RBC approach to collaborative working to meet unmet housing requirements	Noted, this follows guidance in the NPPF
Overall proposed housing provision across the region is estimated to have fallen by 8%. The reduction in housing is taking place in authorities adjacent to Redditch i.e. Wychavon and Stratford. This could affect Redditch. Also consider Birmingham. On page 5 the	It is not possible to make provision in the Local Plan for Birmingham growth if there is no evidence requiring this. It is also not possible to hold up production of all neighbouring plans to enable Birmingham to collect a robust evidence base. If and when a policy related issue

relationship with Birmingham is acknowledged however delaying the resolution of the problem until the next plan review is irresponsible.	affects Redditch then the Plan will need to have provisions to deal with that, but it is too premature therefore support for the collection of evidence and reference to the need for a review is necessary. The SHLAA reflects the migration issues with our neighbours and the chosen scenario does not contribute to any regional shortfall of growth for housing. Redditch's role historically has been to make sure that provision for local needs is met and the settlements status has not changed, therefore this will continue to be the most sustainable approach.
Statement on page 5 that there are no major migratory impacts is questionable	Presumed that this means Page 4 rather than page 5. The SHLAA reflects the migration issues with our neighbours and the chosen scenario does not contribute to any regional shortfall of growth for housing. Redditch's role historically has been to make sure that provision for local needs is met and the settlements status has not changed, therefore this will continue to be the most sustainable approach.

## KEY ISSUE: References to evidence base documents

<b>Sub Issues</b>	<b>Officer response</b>
There is a presumption that all of the information contained within evidence base studies is current and valid. Not reasonable to pick and choose which elements of a report to take notice of	There is no such assumption made in the Plan. Where evidence is valid and of use to inform the policy it has either being referenced or will form part of the Council's evidence base when the Local Plan is required to be submitted.
Policies contained within the draft plan are unsound due to the absence of any evidence to demonstrate that a review of existing policy has been undertaken and the lack of consistency with national policy.	A review of existing policy is the process of completing this Local Plan so it is not clear how the production of a plan itself can be considered unsound.

**What has influenced this Local Plan?**

## KEY ISSUE: Support

<b>Sub Issues</b>	<b>Officer response</b>
Support reference to the Waste Core Strategy and emerging Minerals Local Plan	Noted

## More Information

### Local Portrait

KEY ISSUE: Support for Local Portrait

Sub Issues	Officer response
Commend including details on crime statistics for the Borough in the Local Portrait, which takes into account our previous representations on this part of the Local Plan.	Noted

KEY ISSUE: Clarity

Sub Issues	Officer response
Amend 3 <sup>rd</sup> sentence of page 11 for improved clarity	<p>Noted and agreed for clarity to amend.</p> <p><b>ACTION – Delete and amend paragraph to “There are also more than 500 other heritage assets currently recorded, including locally listed heritage assets which have features of archaeological, architectural, historical or townscape significance to the Borough.”</b></p>

KEY ISSUE: Environment

Sub Issues	Officer response
Can more be made of rural landscape character of the Borough within the Environment section – e.g. the ancient Royal Forest? This would link to landscape policy and historic environment in terms of the county-wide Historic Landscape Characterisation and Historic Farmsteads mapping Project.	<p>The relevant aspects of the Historic Farmstead Characterisation project have been transposed into the more detailed policies in the Plan however a reference to the Borough’s historic landscape would boost this profile.</p> <p><b>ACTION – Include “This south western rural area is an enviable historic landscape and was once part of the ancient Feckenham</b></p>

	<b>Forest.”</b>
The twentieth century heritage of the New Town is worth recognition and would complement the Plan’s stance on its green space network.	Noted and agreed  <b>ACTION – Amend paragraph to include “The urban area of Redditch has a long and complex history as well as a rich twentieth century heritage.”</b>

KEY ISSUE: Images/presentation/formatting

<b>Sub Issues</b>	<b>Officer response</b>
Change picture caption to reference Bordesley Abbey as a Scheduled Monument	Agreed.  <b>Action: change picture caption to “Bordesley Abbey Scheduled Monument”</b>

KEY ISSUE: Crime

<b>Sub Issues</b>	<b>Officer response</b>
Refer to positive data as well as negative data in the Local Portrait. A clear reference to the number of homes and other developments achieving the ‘Secured by Design’ award would be a very helpful indicator in this part of the Local Plan. This would also provide a useful direct linkage between the Local Portrait and Policies 40 and 41.	Although it would be helpful to include number of developments securing secured by design it has not been possible to collect this information and the monitoring of this will not be set up until the Policy is adopted.
The crime statistics (page 10) need to be updated. The figures shown in Table 1 (see Community Safety response) are more accurate and up-to-date.  The following qualitative date could also be added: “95% of people feel safe walking around Redditch Town Centre and the street where they live during the day; at night, this falls to 61% for the Town Centre and 73% for the home street (CHYM Redditch - Research on	Noted and Agreed  <b>ACTION – Add “95% of people feel safe walking around Redditch Town Centre and the street where they live during the day; at night, this falls to 61% for the Town Centre and 73% for the home street (CHYM Redditch)</b>



Transport Behaviour & Perceptions - Baseline Survey, August 2012, p15).	
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## KEY ISSUE: Transport

Sub Issues	Officer response
<p>Paragraph 1 (pg 12) should be extended and evidenced to include footpaths and cycle routes. Suggests it could be changed to:</p> <p>Although the 'bus only' lanes give high priority to bus use, they do not benefit from the natural surveillance of other vehicles and are frequently separated from pedestrian routes and other development that could help to discourage crime and anti-social behaviour.</p> <p>Around 60% of people feel safe walking to bus stops, waiting for buses and travelling on buses during the day; falling to 40% at night (CHYM Redditch - Research on Transport Behaviour &amp; Perceptions - Baseline Survey, August 2012, p18).</p> <p>A similar issue applies to some footpaths and cycle routes which are segregated from road users and development. The risk and perception of crime and anti-social behaviour along these routes is higher than if different design principles had been followed.</p>	<p>This paragraph will be amended to reflect the suggestion.</p> <p><b>ACTION – Amend paragraph to “Although the ‘bus only’ lanes give high priority to bus use, they do not benefit from the natural surveillance of other vehicles and are frequently separated from pedestrian routes and other development that could help to discourage crime and anti-social behaviour.”</b></p> <p>Although these are useful statistics/issues to be aware of, the content of the Local Portrait must be limited to ensure it is not dominated by one particular issue, therefore it is not possible to include this level of detail.</p>

<p>Around 4% of people cite “feeling unsafe walking” as being a main reason stopping them from walking more often. A similar percentage stated that “feeling unsafe cycling” was a main reason stopping them from doing so more often (CHYM ITM phase 1 baseline report, November 2012, p82 &amp; 87).</p>	
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KEY ISSUE: Economy

<b>Sub Issues</b>	<b>Officer response</b>
<p>Paragraph 1 (pg 13) should be extended to: “The New Town District Centres have faced concentrations of crime and anti-social behaviour exacerbated by design factors. These include: the inward orientation of buildings, exposed service areas, excessive permeability, inadequate natural surveillance, poor building design and materials.</p> <p>In this context, management and maintenance of co-located housing and the public realm has struggled to keep pace with developing crime and disorder issues. Work has commenced on the redevelopment of Church Hill Centre and significant regeneration efforts at Woodrow Centre and Winyates Centre have proven the value of design-led responses to these issues.”</p>	<p>It would be acceptable to clarify some of this section but to list the issues with the centres would be too much detail for a summary in the portrait.</p> <p><b>ACTION – Amend to “A number of District Centres (Church Hill, Matchborough, Winyates and Woodrow) suffer from a poor image as their inappropriate design means that they are inward looking and have crime and anti-social behaviour problems. Work has commenced on the re-development of Church Hill District Centre.</b></p>

## Vision

KEY ISSUE: Terminology

<b>Sub Issues</b>	<b>Officer response</b>
<p>Replace ‘Protecting’ with ‘Conserving’ in the heading - Protecting and Enhancing the Historic Environment for consistency with NPPF.</p>	<p>Agreed</p>

	<b>Action: change references in the vision and throughout the plan to “Conserving and Enhancing Redditch’s Historic Environment”</b>
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## KEY ISSUE: Rural Heritage

<b>Sub Issues</b>	<b>Officer response</b>
Give the Borough’s rural heritage better recognition in paragraph 3, page 18.	Recognition of this is included earlier in local challenges and in more detail in the specific policies. Unless there is something specific that the vision has missed which policy needs to rectify it wouldn’t be appropriate to ass this reference just for recognition purposes.

## KEY ISSUE: Crime

<b>Sub Issues</b>	<b>Officer response</b>
The Vision for Redditch Borough should incorporate the following amendment: Creating Safe, Secure, Attractive and Low Crime Places to Live and Work. Unless this is amended, the Vision’s consistency with the NPPF and other elements of the Local Plan will be at risk.	The reference to ‘safe’ is considered more relevant given the aim of the policies which provide the detail and are considered to be NPPF compliant.
Object to the assertion that ensuring that safe and sustainable places can be achieved through design measures alone. We suggest the following amendments: Redditch will have achieved high quality safe design of its new buildings <b>supported by new and/or improved infrastructure</b> . This high quality design <b>and infrastructure</b> strategy is important because there is a poor perception of safety amongst residents. The uniqueness of Redditch’s built environment <b>will also</b> be supported <b>by this strategy</b> . All new development will be of high quality, safe design <b>and supported by infrastructure</b> and contribute towards creating distinctive and sustainable places that reflect the local character and are tailored to the needs of the people that live in the Borough. In	It is difficult to refer to the implementation of infrastructure without an understanding of what that infrastructure might be. At this stage some parts of the suggested text is appropriate and consultation with stakeholders on the IDP report will be necessary to determine if reference to infrastructure is necessary.

particular, shopfronts will be well designed <b>and supported by infrastructure measures</b> to ensure security and to have a positive effect on character and appearance. <b>Signage</b> and advertisements will be well designed and well placed.	
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### Objectives

KEY ISSUE: Support for Objectives

Sub Issues	Officer response
English Heritage welcomes the general scope of the objectives, in particular objectives 1, 4 and 6.	Noted.

KEY ISSUE: Crime

Sub Issues	Officer response
<p>We welcome and support Objective 7, namely to reduce crime and anti-social behaviour, we <b>object</b> to the statement that this can be achieved through design alone. New and/or improved infrastructure, particularly for the emergency services, will be required to achieve this objective. We propose the following amendment to Objective 7 of the Local Plan:</p> <p><i>Reduce crime and anti-social behaviour and the fear of crime through high quality design <b>and infrastructure provision</b>, with regeneration achieved at the former New Town District Centres</i></p>	<p>It is difficult to refer to the implementation of infrastructure without an understanding of what that infrastructure might be. At this stage some parts of the suggested text is appropriate and consultation with stakeholders on the IDP report will be necessary to determine if reference to infrastructure is necessary.</p>

## Sustainable Places to Live which Meet our Needs

### Policy 1 – Presumption in favour of sustainable development

Sub Issues	Officer response
<p>The policy wording does not wholly reflect paragraph 14 of the NPPF in stating that “where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant planning permission unless material considerations indicate otherwise”. This wording is intended to reflect paragraph 14 under “decision taking”, but this part of the NPPF does not refer to “material considerations indicating otherwise” as a policy test. Instead, the intention of paragraph 14 is that permission should be granted unless adverse impacts significantly or demonstrably outweigh benefits or there is a specific restriction within the Framework.</p> <p>Omit the wording “unless material considerations indicate otherwise” from the draft policy.</p>	<p>The Policy wording is a copy of the PINS model policy and is therefore not likely to be inconsistent with the NPPF. There is no justification for making amendments to the model policy.</p>

### Policy 2 – Settlement Hierarchy

KEY ISSUE: Cross boundary reference

Sub Issues	Officer response
<p>Supports the general settlement hierarchy set out in the policy, however acknowledge cross boundary. Suggested text “As not all needs can be met within the Borough, some development will be delivered on previously identified Green Belt in Bromsgrove District adjacent to the Borough boundary in urban extensions.”</p>	<p>Reference to cross-boundary development is already included in the reasoned justification to the policy.</p>
<p>Reasoned Justification should be explicit that neither the urban area nor the Borough itself can appropriately accommodate Redditch's</p>	<p>Reference to the cross-boundary development needs is already included in the reasoned justification.</p>

housing needs. This should also extend to the need for all sites to contribute early to providing housing and necessary strategic infrastructure to maintain a 5-year housing land supply.	
Justification text should refer to the development strategy in Policy 3 which states that Strategic Sites can come forward immediately rather than allow a suggestion that there is an intention to phase urban sites before non-urban allocations.	Agreed.  <b>ACTION - Insert reference to Policy 3 in second paragraph of reasoned justification.</b>

KEY ISSUE: Support for policy

<b>Sub Issues</b>	<b>Officer response</b>
Support the acknowledgement that Redditch, as the main settlement of the Borough, offers the most sustainable location for growth.	Noted
Given the character of the town it is appropriate that the Council has acknowledged that the vast majority of this growth will have to take the form of urban extensions on green field sites adjacent to the existing development boundaries.	Noted
The identification of Redditch as the focus for development, with urban extensions adjacent to the borough boundary to meet housing need is supported.	Noted
Generally supportive of directing to key centres.	Noted
Welcome the clear policy references to local character and distinctiveness.	Noted

KEY ISSUE: Feckenham

<b>Sub Issues</b>	<b>Officer response</b>
This village needs to expand in order to revitalize the community and make a sustainable future for the village. Historically there has been concerns that the young people of the village have no options to purchase or rent homes.	Feckenham was identified in the Accessibility Study and Settlement Hierarchy for Redditch Borough (2008) as being an unsuitable location for sustainable development given its limited facilities and significant lack of infrastructure and remoteness to the urban area.

<p>As stated in the consultation document “predominately set within the green belt” but the report does not say that in part Feckenham is in or borders open countryside, and therefore would be able to consider for development within the NPPF guidelines.</p> <p>More consideration should be given to looking at development of Feckenham for the wellbeing of the village and in order to meet the objectives set out in points 2, 3, 5, 9, 10 &amp;13.</p>	<p>Some development may go at Feckenham if local development needs are identified i.e. housing for Feckenham residents who are struggling to afford a property in their village location and who need to remain in the village for employment or other reasons. The locally identified need for Feckenham (up to 2015) has already been met. This housing need survey will be reviewed at an appropriate date by the Housing Strategy Team.</p>
<p>The term ‘preserve’ is used in the third bullet point, suggest it might be better to use the term ‘conserve’ and enhance.</p>	<p>Agreed. This wording is in line with the terminology used in the NPPF.</p> <p><b>ACTION – change ‘preserve’ to ‘conserve’</b></p>

## KEY ISSUE: Astwood Bank

<b>Sub Issues</b>	<b>Officer response</b>
<p>The possibility of a small urban extension to the village of Astwood Bank does not even seem to have been considered. The possibility of building a hundred or two houses as urban extensions to that village ought to have been considered.</p>	<p>Astwood Bank has been identified as a sustainable rural settlement where development within the settlement boundary would be appropriate. The settlement is surrounded by Green Belt therefore a development of the size suggested would require development on land which is currently designated as Green Belt. Development in this location has been ruled out on a number of occasions for several reasons.</p>
<p>Distribute growth to key settlements with established facilities, services and infrastructure. In this regard recognise that Astwood Bank would be a suitable location for development to meet some of the Borough’s housing needs. This is in accordance with the key theme running through the Framework of promoting sustainable development. The Framework is clear that development which is sustainable should go ahead. This is reinforced by the presumption in favour of sustainable development.</p>	<p>The Settlement Hierarchy distributes development according to the role and function of the three main settlements in the Borough. The policy allows for development within the settlement boundary of Astwood Bank to meet identified development needs and to support local services and infrastructure.</p>

## KEY ISSUE: Distribution of development

<p>In terms of Spatial Distribution, your authority will have different and distinct housing market areas. Each of these distinct areas will have their own requirement for housing and this should be reflected in the spatial distribution of housing supply within the Local Plan. This should be based on the findings of the evidence base and should not be a politically driven spatial strategy to put a disproportionate amount of housing in areas where people do not want to live.</p>	<p>The Settlement Hierarchy and thus the distribution of development is based on an assessment of the function of the main settlements within the Borough. The Accessibility Study and Settlement Hierarchy for Redditch Borough (2008) forms part of the evidence base for the Local Plan.</p>
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**Policy 3 – Development Strategy**

## KEY ISSUE: General comments

<b>Sub Issues</b>	<b>Officer response</b>
<p>Acknowledge that the first phase of the Brockhill East site is under construction and the remainder of the land west of the railway line is the subject of pre-application discussion.</p>	<p>It is not appropriate to refer to specific sites in this policy.</p>
<p>Following a dispersed spatial distribution pattern across a large number of settlements is undesirable as this approach is not likely to be sustainable</p>	<p>Noted. The Development Strategy as proposed does not distribute development across a large number of settlements.</p>
<p>The sequential approach directs that the release of Green Belt land for development should be the last option. Having a large green corridor down the Arrow valley is no doubt attractive, but an assessment should have been undertaken as to whether some land could not be nibbled from the edges of this without excessive damage to this green corridor.</p>	<p>Housing development on parts of the Arrow Valley park has been considered through the SHLAA but sites were found unsuitable for a number of reasons.</p>

## KEY ISSUE: Phasing/timing

<b>Sub Issues</b>	<b>Officer response</b>
<p>Supportive that the policy allows Strategic Sites to come forward</p>	<p>Noted</p>



immediately	
States that all strategic sites can come forward for development “immediately”. It is not clear what is meant by this or what purpose the statement of immediacy serves. Examination of the strategic site policies later in the Plan reveals that Brockhill for example is expected in multiple phases over 10 years, and Alexandra Hospital in years 6 to 10.	Strategic sites have been assessed to determine when they are expected to be delivered, as identified in the strategic site policies. However, this is not intended to limit when the sites are delivered and they may be delivered earlier in the plan period.
The draft policy states that the suitability of sites to be brought forward for development will be determined following satisfactory demonstration of how all necessary infrastructure to enable development will be funded and delivered. At face value, this statement confirms that none of the allocations set out at Appendix 2 of the Plan have had their suitability for development determined. This cannot be the intention, but that is nonetheless what it states. The effect of the statement is that none of the allocations can be considered sound within the meaning set out at paragraph 182 of the NPPF.	This statement is intended to ensure that at the time a planning application is submitted the developers can demonstrate that the necessary infrastructure can be funded and delivered. The Local Plan will be accompanied by an IDP which will identify the infrastructure requirements and likely funding sources. Further explanation will be included in the RJ of the policy to clarify this matter.  <b>ACTION – Explain infrastructure requirements in the RJ</b>
The reference to the “separate consultation on Redditch growth” is not appropriate, as it confuses the development principles for strategic sites within Redditch Borough with development principles for sites within Bromsgrove District. Our understanding is that the development principles to be applied to each are not necessarily the same.	This reference was included because the Draft Local Plan No4 and Redditch Growth consultations were being held concurrently. The outcome of the Redditch Growth consultation will determine the final wording of this policy.
Amend the policy to read “All strategic sites are to come forward in accordance with the strategic site policies. The strategic sites will be delivered alongside the necessary infrastructure to support them, taking account of the Council’s most up-to-date Infrastructure Delivery Plan.”	This wording is not considered appropriate because the Strategic Site policies only have anticipated delivery timescales and it would not be appropriate to stall them if they could be delivered earlier.
Long lead in times associated with such large strategic sites means it is unlikely that these sites will be able to contribute to delivery in the first five years.	Agreed. The development strategy covers the entire Plan period. The individual strategic site policies indicate when, during the plan period, the sites are likely to come forward for development.

## KEY ISSUE: Delivery

<b>Sub Issues</b>	<b>Officer response</b>
Concern that the final paragraph of the policy is the only monitoring or implementation policy. The policy is not strong enough to ensure delivery of the Plan's Development Strategy; to 'endeavour' is merely to 'try' or 'attempt', whereas the Council will need to ensure delivery. The word 'endeavour' should be replaced by: ".actively engage with developers..."	Agreed. The wording will be amended to "...the Council will employ proactive planning measures such as SPD's, Local Plan review, compulsory purchase, active engagement with developers or investigating potential funding sources."  <b>ACTION – amend policy wording</b>
Failing to deliver housing sites and cannot demonstrate a 5 year land supply as required by the NPPF. Identify suitable sites and to promote the submission of planning applications on those sites.	The Draft Local Plan and the SHLAA identify all sites suitable for housing development within the Borough. The Council is actively engaged with landowners and developers to encourage implementation of the identified sites.
Assumes that strategic sites can come forward immediately, but also places conditions on such deliverability so there is no guarantee that sites will be delivered as proposed	The condition to demonstrate infrastructure delivery is not considered unreasonable if it is required to enable and support development.

## KEY ISSUE: Support for policy

<b>Sub Issues</b>	<b>Officer response</b>
Support the comment that all strategic sites, including the land at Webheath, should be delivered early in the plan period in order to ensure a robust supply of housing for local residents.	Noted

**Policy 4 – Housing Provision**

## KEY ISSUE: Support for sites included to meet the Housing Requirement

<b>Sub Issues</b>	<b>Officer response</b>
Support for the inclusion of Broadacres Farm (A435)	Support noted. Broadacres Farm will be included in the 2013 SHLAA update to reflect this position. The Policies Map will also be updated to identify this site for residential development.

	<b>ACTION: Update Policies Map</b>
Support for inclusion of site 217 (Sandycroft) for residential development	Support noted. The analysis from the 2013 SHLAA update will result in a slight boundary change for this site.
	<b>ACTION: Update Policies Map</b>
Support for inclusion of Webheath ADR. Development provides the best opportunities to extend existing infrastructure and therefore meet the needs of a growing population in a sustainable and cost effective manner.	Support noted. See Webheath Strategic Site response for additional details.

## KEY ISSUE: Support for Housing Requirements

<b>Sub Issues</b>	<b>Officer response</b>
Support the use of the proposed housing target figure of 6,380 dwellings, as this correctly originates from the Worcestershire Strategic Housing Market Assessment (SHMA) 2012	Support noted.
In general agreement that there is a need for housing in Redditch	
All of the housing needs for Redditch should be met either within the administrative boundary or as suggested partly within neighbouring Bromsgrove through joint working.  We strongly agree with the assertion that: <i>“There is insufficient land within Redditch Borough to address the housing needs of its population up to 2030; therefore some cross boundary growth will be required in Bromsgrove District to contribute towards meeting those needs.”</i>	Support for cross boundary working is noted. It should be pointed out that discussions also take place with Stratford-on-Avon District Council to address cross boundary development on the eastern boundary of the Borough.

## KEY ISSUE: Objection to sites included to meet the Housing Requirement (SHLAA sites) (other than Strategic Sites)

<b>Sub Issues</b>	<b>Officer response</b>
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<p>Object to capacity attributed to site 217 – increase from 10 to 20/25 units to reflect a higher density due to the sites close proximity to the Town Centre</p>	<p>The capacity of this site has altered in the 2013 SHLAA update through the information received in this rep and other landowner information related to the site. The only land available for development and hence inclusion in the SHLAA/ BORLP4, is for 9no. units. The capacity for this site will reflect this updated position.</p>
<p>Overall requirement up to 2030 of 6,380 new units is not challenged, however, the level of new housing which will need to be provided outside of the Redditch area is challenged.</p>	<p>Support for housing requirement is noted. Further key issues in this section deal with the available capacity within the Borough to justify the need for the level of cross boundary development.</p>
<p>Rear or 144-162 Easemore Road: Whilst there is a suggestion that discussions are on-going about a revised scheme, the site was an allocation in Local Plan No.3, and therefore the site has failed to come forward over a number of years. Its delivery is open to doubt, particularly as it is in multiple ownership.</p>	<p>Owner consortium in place. Actions to undertake marketing of the site are imminent. Therefore site considered to be capable of delivery within 5 years.</p> <p>The 2013 SHLAA update will reflect this position.</p>
<p>Former Claybrook First School: Whilst SHLAA suggests site could be delivered within 5 years, it recognises that access is problematic due to the narrow width of Dilwyn Close. No certainty that site will come forward.</p>	<p>The County Council as landowner has accepted an offer for the site and expect to complete by the end of the year. Therefore site considered to be capable of delivery within 5 years.</p> <p>The 2013 SHLAA update will reflect this position.</p>
<p>Widney House and Adjoining Land: SHLAA reveals no evidence of a planning application, and industrial units are being actively advertised to let. Site contamination clean-up costs impact on viability is unknown. Existing access to the industrial estate is constrained in width and requires improvement. SHLAA doesn't provide clear evidence as to deliverability, and delivery within 5 years is very optimistic</p>	<p>The delivery of this site within 5 years is based upon information received by the landowner and is expected to be updated as part of the 2013 SHLAA Refresh. WCC Highways Authority have no issues with the number of dwellings proposed from the existing access.</p>
<p>A435 ADR: Shown as delivering 184 dwellings. SHLAA identifies 33.43 ha of land. The southernmost portion of the SHLAA site is excluded from the draft Local Plan Policies Map, but the area shaded in pink as an allocation on that map does appear to exceed 10.25Ha.</p> <p>Complicated by the "Review of the A435 ADR and Adjoining Land February 2013", which identifies potential development areas totalling</p>	<p>The Policies Map reflects the potential for development in the SHLAA. The Map therefore needs to be updated to reflect the surveyed developable area identified in the A435 Review which was completed before the SHLAA update for 2013.</p> <p>The delivery of 184 dwellings is based upon land available and capable of being delivered within Redditch Borough only, as identified</p>

<p>345 dwellings on 19.4 ha, including land in Stratford on Avon District. Whilst the review document reaches a general conclusion that some ADR could be suitable for development, it also recommends significant further technical work to verify this conclusion.</p> <p>Overall, it is not clear how the Local Plan yield of 184 dwellings has been arrived at, and how the conclusion has been reached that this yield is deliverable in the absence of further technical work.</p> <p>The White Young Green report of 2009 concludes that “the disadvantages of developing this site for any significant number of dwellings outweighs the benefits”. The mixed views of the merits of this site as a location for significant residential development are noted, and echo our own observations on site, particularly the well treed nature of the land and its obvious use by local residents as a valuable amenity.</p> <p>The 2013 review document notes that the ADR designation was retained in the 2011 Revised Preferred Draft Core Strategy “because there were concerns regarding the deliverability of development on the site”. The 2013 review document does not provide clear evidence to demonstrate that the previous conclusion as to deliverability, and the White Young Green conclusions as to acceptability, are now overcome.</p>	<p>in the A435 Review. Further technical work would be required but this is not an exceptional matter that differs from any other site which would need work before a planning application is received.</p> <p>The 2013 SHLAA update will reflect this position.</p> <p><b>ACTION: Amend site boundary on Policies Map</b></p> <p>There were previous concerns regarding the delivery of the site as the willingness of the majority land owner to release the site for development was uncertain. This was further complicated by the potential for cross-boundary development in this location in Stratford on Avon district. There are now active discussions between all parties concerned to overcome any deliverability issues. It should be noted that the conclusions of the White Young Green report (2009) were largely discredited by the WMRSS Inspectors, particularly with regards to WYG’s change of view on Redditch’s former ADR sites.</p>
<p>Brockhill East: A landscape assessment report by Iain Reid raises very significant concerns about landscape justification for the allocation. The report concludes that total yield should be considered more in the order of 700 dwellings, not around 1000.</p>	<p>The Reid Assessment does not adequately address landscape issues and makes assumptions of capacity based on assumed density. This is not considered robust enough to recommend a capacity change for this site. The landowners/ agents have provided detailed assessments regarding capacity and protection of important landscape features which mirrors the Council officers understanding of the site.</p>
<p>Webheath: Policy 48 refers to the Strategic Site at Webheath comprising “around 400 to 600 dwellings”. However, Appendix 2</p>	

<p>assumes the maximum 600 dwellings.</p> <p>Policies Map includes an existing ribbon of housing on Crumpfields Lane within the development area, therefore the existing housing should be netted off the housing land supply for the Plan period (approximately 69 dwellings). A further 11 dwellings appear to be within the allocation site, bringing the potential total to be netted off to 80.</p> <p>If planning permission is granted and 200 dwellings are delivered, query what the yield is expected to be from the balance of the site. The draft Local Plan is contradictory on this point, but the Iain Reid landscape and density assessment indicates 350 dwellings as being a reasonable estimate. If the existing dwellings are to be netted off, this potentially reduces to 270 dwellings.</p> <p>It is important to avoid excessive remodelling of site topography, and furthermore that part of the site is in Flood Risk Zone 3 (a and b). On-site surface water detention is required. These detailed considerations will have an impact upon dwelling yield.</p> <p>We note that the White Young Green report of 2009, commissioned in part by the Council and still used as part of its evidence base, concludes very clearly that the Webheath ADR should not be developed at all, and in fact should be treated as part of the Green Belt. It is unclear what new evidence has caused the Council to set aside this clear finding in favour of allocating the site for housing.</p>	<p>The capacity for the strategic site has already taken account of the existing development within the area and represents a net developable capacity. The existing development within the strategic site boundary does not therefore need to be discounted from the capacity.</p> <p>If consent is granted for 200 dwellings then the remaining yield is expected to be up to 400 dwellings as a maximum.</p> <p>Acknowledge that detailed landscape and visual assessment work and flood risk assessment work needs to be undertaken, it would be for the landowners/agents to commission this work. Officers are aware that landscape features and potential flood risk may limit capacity but this has been taken into account in the range of capacities from 400 to 600, but consider that the Reid Assessment does not address all the natural environment issues to justify altering the capacity at this stage.</p> <p>At this stage no new information has been received to suggest that the flexibility that currently exists within the Webheath capacity should be altered.</p> <p>It should be noted that the conclusions of the White Young Green report (2009) were largely discredited by the WMRSS Inspectors. The need for housing outweighs the need to protect the land from development.</p>
<p>St Stephen's School Playing Field: Enquiries of the Council have confirmed that the County Council is now intending to use the playing field for educational purposes, so it is to be withdrawn from consideration for development.</p>	<p>Noted and agreed.</p> <p>The 2013 SHLAA update will reflect this position.</p>

	<b>ACTION: Delete site on Policies Map</b>
	<b>ACTION: Delete site from Appendix 2</b>
Birchfield Road: Site significantly affected by noise from immediately adjoining roads. This is likely to affect developability in amenity terms, either in whole or part. Together with its Green Belt designation, site should be discounted, or reviewed through a proper assessment of the noise environment affecting it.	An assessment of noise impact has been undertaken and dialogue is on-going with Regulatory Services. Mitigation against noise impact may include triple glazing and landscape buffering for example.  The 2013 SHLAA update will reflect this position.
Former Hewell Road swimming baths: The site is shown as falling wholly within functional flood plain on the Environment Agency interactive maps. Paragraphs 100 and 101 of the NPPF are clear that in such circumstances the land should not be allocated for residential development unless the sequential and exception tests have been applied.  Given that only 14 dwellings are allocated to this site, it should be possible to accommodate this number in a location at lower risk of flooding, for example as part of Redditch urban extension.	This site is a brownfield site within the urban area. RBC has a duty to make the most efficient use of land within its boundary to reduce the impacts of cross boundary development on Green Belt land. The proposed development will offer opportunities to reduce the causes and impacts of flooding as expressed in NPPF para 100. Drainage engineers have designed a scheme which will mitigate against flooding issues if this site is developed. Flood risk assessment work is due to be undertaken shortly to confirm that the mitigation measures are deliverable.  The 2013 SHLAA update will reflect this position.

## KEY ISSUE: Housing supply calculations

<b>Sub Issues</b>	<b>Officer response</b>
Appendix 2 of draft Local Plan identifies a supply of 2946 dwellings, 2883 of which are 'commitments'. It shows commitments as comprising a combination of sites with extant planning permission and sites listed as allocations, be they strategic or non-strategic. The appendix assumes that every dwelling listed from every source will be delivered. It does so in the context of, for example, a dwelling delivery in 2011/12 that is only 19% of the annual requirement of this emerging Local Plan, and a severe economic downturn. We suggest that is not a tenable position for the draft Plan to take.	Whilst it is noted that delivery in 2011/12 has fallen below the annual average requirement due to the economic downturn, it is not anticipated that this status quo will remain for the entirety of the Plan period. Previous Plan periods demonstrated delivery above the annual average requirement in periods of economic upturn. There is no evidence to suggest that the economic climate will not recover during this Plan period an increase delivery rates.

Sub Issues	Officer response
<p>Paragraph 47 of the NPPF is clear that for land to be identified as part of a supply of specific, developable sites for growth, it should be in a suitable location, and there should be a reasonable prospect that the site is available and can be viably developed at the point envisaged. We do not see how the Council can reasonably apply this description across the board of Appendix 2.</p> <p>The dwelling delivery set out in Appendix 2 requires adjustment. Appendix 2 should apply a 10% lapse rate to the commitments listed.</p>	<p>The SHLAA has identified delivery timeframes for its sites, predominantly based on landowner/ agents information. The purpose of asking landowners/ agents for this information is to ensure that the delivery timeframe is as accurate as possible to ensure that the 5 year housing land supply figure can be calculated accurately.</p> <p>Lapse rate analysis carried out annually on large sites indicates that sites rarely lapse and the average lapse rate over the last 17 years as around 3%, some of which can be attributed to sites being dropped as part of a previous local plan site review. Therefore, officers do not think it reasonable to apply a 10% lapse rate to the sites which contribute to BORLP4.</p> <p>With respect to small sites, an allowance is included in the SHLAA, which takes account of lapsed sites, as this is a more common occurrence across sites of less than 10 dwellings. Analysis shows that the current average annual lapse rate, over the last 17 years is 9.6%.</p>

## KEY ISSUE: Alternative locations for residential development

Sub Issues	Officer response
<p>Locate housing in the Town Centre, near the railway station and other existing facilities</p> <p>The town centre needs development, regeneration and expansion first</p> <p>Old shops, hotels, office blocks could be converted into low cost housing and to breathe new life into Redditch Town Centre to try to</p>	<p>There are redevelopment opportunities within the Town Centre. However, the Local Plan has a duty to meet other development needs such as retail, leisure and other compatible town centre uses as well as housing. Until more detailed plans emerge to deliver the Town Centre Strategy, the amount of residential development feasible cannot be identified.</p> <p>Whilst it is acknowledged that development located in or close to the</p>



<b>Sub Issues</b>	<b>Officer response</b>
create a more vibrant cafe-culture	<p>Town Centre has many advantages, the likely amount of residential development that could be provided would not be substantial enough to remove the need for residential development elsewhere in the Borough.</p> <p>The introduction of changes to Permitted Development Rights (30 May 2013) will help to facilitate change of use from office buildings to residential development, for an initial three year period. At this point in time, with the absence of monitoring data, an allowance for this type of change of use cannot be incorporated into the windfall allowance. If the initiative is extended beyond the three year period, and residential gains are significant, officers will reassess the contribution these gains make to the housing supply. However, it should be noted that losses to employment stock may result in additional employment land allocations being made elsewhere.</p>
Use brownfield sites in preference to greenfield sites. Make better use of brownfield land	<p>The reuse of brownfield land is actively encouraged in the draft BORLP4 Policy 5 (Effective and efficient use of land).</p> <p>During the BORLP3 Plan period, Redditch BC had a Structure Plan target of 25% of its residential development to be built on brownfield land. By the end of the Plan period (1996 to 2011), 51.3% of housing completions were on brownfield land.</p> <p>This completion rate now leaves Redditch with less brownfield land to develop during the BORLP4 Plan period. The SHLAA identifies as much land as possible for development within Redditch's urban area. Of the 3011 dwellings identified within the 2012 SHLAA update, only around 500 can be accommodated on brownfield land.</p> <p>The SHLAA is updated on an annual basis and consideration is given to the inclusion of appropriate brownfield sites, which could contribute</p>

Sub Issues	Officer response
Use town centre car parks	<p>towards meeting the housing requirement.</p> <p>Some Town Centre car parks, such as Prospect Hill and Bates Hill fall within the Town Centre Strategic Site (Policy 30). As such, the appropriateness of residential development will be considered alongside other town centre uses.</p> <p>Prospect Hill car park is currently identified in the SHLAA for 71 residential units.</p>
Convert upstairs space within the Kingfisher Shopping Centre	<p>Policy 32 (Use of Upper Floors) aims to encourage alternative uses for the upper floors of the Shopping Centre, provided that the main retail function and the vitality of the Centre is not compromised. The Kingfisher Centre Management Team is already considering compatible town centre uses in vacant office space above the retail units, such as crèche facilities.</p> <p>Change of Use of this nature is unlikely to generate significant quantities of residential units and would come forward as windfall contributions, for which an allowance is included in the SHLAA.</p>
The Upper Norgrove House site should be used for affordable bungalows for the elderly	<p>The Upper Norgrove House site forms part of the wider Webheath ADR and as such, should be brought forward in a comprehensive manner. The SHMA and the Worcestershire Extra Care Housing Strategy both identify the types of housing needed to meet the needs of the aging population during the Plan period. This would be considered as part of any planning application to develop the site.</p>
Put development at Feckenham	<p>Feckenham has been eliminated as a suitable location for substantial amounts of development following its consideration early in the Plan process. It was identified in the Accessibility Study and Settlement Hierarchy for Redditch Borough (2008) as being an unsuitable location for sustainable development given its limited facilities, significant lack of infrastructure and remoteness to the urban area.</p>

Sub Issues	Officer response
	Some development may go at Feckenham if local development needs are identified i.e. housing for Feckenham residents who are struggling to afford a property in their village location and who need to remain in the village for employment or other reasons. The locally identified need for Feckenham (up to 2015) has already been met. The Housing Need Survey for Feckenham will be reviewed at an appropriate date by the Housing Strategy Team.
Redditch BC must fully utilise all other building locations which are closer to supportive infrastructures	This has been undertaken through the on-going SHLAA process. The 2012 SHLAA update identifies sites which have the potential to deliver around 3000 dwellings. This leaves a shortfall of around 3400 dwellings to meet the housing requirement.
Bring disused buildings back into use before considering building on the last remaining bit of beautiful countryside this town has. Eg. office units by McDonalds, building beside the Redditch train station	<p>Disused buildings such as those at the train station have already been considered as appropriate sites to accommodate town centre related uses.</p> <p>Care needs to be taken when considering Change of Use within existing employment locations to ensure that existing employment practices are not compromised. Whilst it is acknowledged that there are vacant office units within the Borough, it is important to recognise that the Borough needs employment opportunities as well as homes. The Plan covers a period up to 2030, which is expected to accommodate both economic 'highs' as well as 'lows'. It would be inappropriate to compromise the future of Redditch's economic prosperity by only taking account of the Borough's housing needs. However, if it can be demonstrated that empty business units have been marketed appropriately and there is no reasonable prospect of them being used for their intended purpose, then consideration for alternative and appropriate uses will be considered.</p> <p>The introduction of changes to Permitted Development Rights (30 May 2013) will help to facilitate change of use from office buildings to</p>

Sub Issues	Officer response
	residential development, for an initial three year period. At this point in time, with the absence of monitoring data, an allowance for this type of change of use cannot be incorporated into the windfall allowance. If the initiative is extended beyond the three year period, and residential gains are significant, officers will reassess the contribution these gains make to the housing supply. However, it should be noted that losses to employment stock may result in additional employment land allocations being made elsewhere.
If the council are desperate for housing, a cheaper option would be to buy every house on the market in the area and make everyone happy	<p>The SHMA process, from which the housing requirement is derived, takes account of current vacant stock within the Borough. Despite this, Redditch still has a need for 6400 new homes in addition to those currently for sale.</p> <p>Buying every home currently for sale is not a financially viable option for the Borough Council and would still not reduce the need for additional new homes.</p>
<p>Bring empty homes back into use</p> <p>One report shown at a consultation meeting indicated that there where over a thousand houses empty in Redditch already.</p>	<p>The SHMA allows for a 3% vacancy rate in existing housing stock (to allow for market churn, supply and demand) when calculating the amount of additional dwellings needed. An assumed vacancy rate of 3% was assumed within the WMRSS evidence as set out in the 'Housing Background Paper Supplement'.</p> <p>As of the 31 May 2013, Redditch had a vacancy rate of 1.57%, with only 0.49% of properties in the Authority classified as being vacant for more than 6 months.</p>
Develop unused employment land for housing	Redditch has a need for employment provision during the Plan period as well as housing. However, as part of the annual SHLAA and ELR updates, the SHLAA assesses the suitability of any employment land which is considered unlikely to come forward for employment uses as a result of the ELR update.

Sub Issues	Officer response
<p>ELR 2012 identifies a need for additional employment land in the Borough. However, a number of the sites have very little potential for being developed for employment uses and are also located close to existing residential development. (Adj. Greenlands Business Centre, Studley Road, Park Farm North; Land to the Rear of the Alexandra Hospital). These should be reconsidered for residential development.</p>	<p>The ELR update has already considered the suitability of former employment sites for alternative uses as advocated in the NPPF (para.22), which are in turn assessed through the SHLAA process for inclusion to meet housing needs. In the 2012 ELR update, three sites were considered suitable to meet housing needs. Land to the rear of the Alexandra hospital is already a strategic housing site in BORLP4 (policy 47) with some additional potential for small scale office development also. The sites mentioned by the respondent are within Primarily Employment Areas or part of Strategic Sites for redevelopment, and are not suitable for residential development.</p>
<p>Redditch has older office buildings which are unsuitable for modern business needs and therefore remain long term vacant. The fact that the great majority of vacant office space is within sustainable town centre locations, much of it would be suitable for residential and mixed-use re-development (RONA, GVA report para 4.12)</p> <p>Close attention to design and planning in the existing Redditch and Bromsgrove town centres incorporating new dwellings amongst and above shops and service facilities and revitalising old housing stock would be more cost effective, sustainable and regenerative in the long term than building another new satellite estate remote and unconnected from Redditch or Bromsgrove</p>	<p>This comment is noted and supported. The conversion of vacant Town Centre office space is encouraged in Draft BORLP4 (Policy 25).</p> <p>Beyond the Town Centre, the introduction of changes to Permitted Development Rights (30 May 2013) will help to facilitate change of use from office buildings to residential development, for an initial three year period. At this point in time, with the absence of monitoring data, an allowance for this type of change of use cannot be incorporated into the windfall allowance. If the initiative is extended beyond the three year period, and residential gains are significant, officers will reassess the contribution these gains make to the housing supply. However, it should be noted that losses to employment stock may result in additional employment land allocations being made elsewhere.</p>
<p>What effort has been made by Redditch BC to build multi-storey flats to satisfy the requirement for 6400 homes</p>	<p>This option was presented as one of the issues in the Issues and Options consultation in May 2008. The results of the consultation proved that this option was not popular. Multi storey flats do not form part of the Town's locally distinctive character and have high levels of anti-social behaviour associated with them.</p>
<p>Expand the Redditch Local Plan No.4 area to the south and west (Crumpfields Lane)</p>	<p>Land in this location was dismissed as part of the Housing Growth Study (Area 3). The Assessment of Area 3 referred only to the land</p>

Sub Issues	Officer response
	beyond the Webheath ADR.
<p>Many derelict fields are available within Redditch</p> <p>Waste and scrub areas within the Redditch conurbation that these houses could fill</p>	As much vacant and derelict land as possible has been assessed for inclusion in the SHLAA, which is updated annually. Without specific location details, it is not possible to explain why some sites have or have not been included as having development potential.
Hill Top	Unclear which land is being referred to at Hill Top. However, Hill Top falls within the Webheath ADR and is considered suitable for development in the SHLAA and already counts towards the housing requirement
Land adjacent to Trafford Park	Unclear which land is being referred to. However, some former employment land to the rear of Trafford Park has been reallocated to meet residential needs as a result of the 2013 ELR and SHLAA updates. All other land in this vicinity is either developed or surfaced car parking that is in use.
<p>What is happening to Hewell Road Swimming Pool? What is happening to the Children's Home in Webheath? These are just 2 sites where impact would be minimised and the required social / starter homes could be constructed.</p>	<p>Hewell Road swimming pool site has been identified for residential development in the SHLAA and already counts towards the housing requirement</p> <p>Webheath Children's Home is not being considered for closure. Therefore, consider that this comment relates to the former refuge at Upper Norgrove House. In which case, the site has been identified in the SHLAA and already counts towards the housing requirement</p> <p>At this stage, the type and tenure of development on this site has not yet been determined. The SHMA identifies what types and tenures are needed in Redditch, and policy 4 (Housing Provision) refers developers to the SHMA.</p>
Hewell Road at Enfield has numerous sites available, approve 'Change of Use' and build on these.	Hewell Road, Enfield is an area for primarily employment uses. RBC also has a duty to identify suitable land to meet employment needs. In a location such as this, employment uses would be the primary use for consideration. If applications were received for change of use or

Sub Issues	Officer response
	<p>redevelopment for residential uses, each proposal would need to be assessed on its individual merits. It would be inappropriate to approve change of use to residential if this type of development would compromise the working practices of surrounding existing business uses. The new Permitted Development Rights for change of use from B1 (office) to residential may provide some windfall contributions for residential development. A windfall allowance already forms part of the contribution to meeting the housing requirement.</p>
<p>Demolition is being carried out near Park Farm, build there.</p>	<p>Park Farm is an area for primarily employment uses. RBC also has a duty to identify suitable land to meet employment needs. In a location such as this, employment uses would be the primary use for consideration. If applications were received for change of use or redevelopment for residential uses, each proposal would need to be assessed on its individual merits. It would be inappropriate to approve change of use to residential if this type of development would compromise the working practices of surrounding existing business uses.</p>
<p>Old school sites should be used</p>	<p>Former school sites already contribute to meeting the housing requirement and are identified in the SHLAA. Namely: Claybrook First School, Marlpit Farm First School and Dingleside Middle School.</p> <p>School site disposal is undertaken by WCC as part of a formal education review process. If WCC, as Education Authority carry out such reviews in the future, any suitable sites will be considered to meet development needs.</p>
<p>Winyates Green Triangle should be used</p>	<p>Winyates Green Triangle forms part of the Redditch Eastern Gateway allocation and has been identified to accommodate the high end business/ employment uses required for Redditch.</p>
<p>Current housing stock in Redditch should be examined and occupancy levels should be established.</p>	<p>This is an issue for the Housing Team within the Council and cannot be influenced by planning policy. Reorganising occupancy levels within public sector housing stock would not remove the need for</p>

Sub Issues	Officer response
Better use of existing housing stock would reduce the housing figure, it ignores local need.	additional housing to meet the Borough's needs.
Dwellings should be brought back into the housing sector where people have left to live somewhere else and sub-let their own property, private or council	Sub-letting of public sector housing stock is an issue for the Housing Team within the Council and cannot be influenced by planning policy. Private renting is a growing sector for meeting housing provision. The housing requirement does not differentiate between private sector tenures.
Large scale developments should be stopped because of the pollution, disruption levels they create and surge of extra traffic and road pollution.	Large scale developments are inevitable due to the numbers required to meet the housing requirement. Issues such as traffic generation are inevitable but also mitigated against during the application process. Draft BORLP4 also contains policy 19 (Sustainable Travel and Accessibility) to encourage more sustainable travel patterns, improve accessibility and reduce the need to travel.
Small-scale in-fill policy in the areas where land has been identified so the effects of this type of development is absorbed into existing infrastructure, shops, schools, roads.	Sites of 5 or more dwellings are identified in the SHLAA. Smaller sites i.e. infill are not restricted from being put forward for development.
Balance the developments across the whole of the borough boundaries west to east.	See response at Cross Boundary Miscellaneous Key Issue: Alternative locations for development
Redditch BC and Bromsgrove DC have not actioned or delivered upon the duty to cooperate with Birmingham City Council, under the terms of the Localism Act 2011.	See response at Cross Boundary Miscellaneous Key Issue: Miscellaneous – Planning/ consultation process
Birmingham City Council, own substantial tracts of land within the Maypole area (south of the city, adjacent to the A435), which they have requested Bromsgrove DC that they wish to build upon.  Bromsgrove DC should assist Birmingham in meeting its own and Redditch BC's targets, by building there.	See response at Cross Boundary Miscellaneous Key Issue: Alternative locations for development
Washford	Washford is one of Redditch's designated employment areas. Some vacant land within this area has been identified in the ELR for employment development. The annual update of the ELR ensures that employment land is not protected for long term employment use if



Sub Issues	Officer response
	there is no reasonable prospect of that land being brought forward for that use, in accordance with NPPF para.22.
Other areas on the borders of Birmingham	See response at Cross Boundary Miscellaneous Key Issue: Alternative locations for development
Other sides of the town (E and N), housing areas are currently cut off from the countryside by main roads. New housing could solve this problem. If the new housing area links to existing housing areas and gave links to lanes further in the countryside this could serve to break those boundaries.	See response at Cross Boundary Miscellaneous Key Issue: Alternative locations for development
Residential corridor running to either the north or south of the Coventry Highway, or along the bus route to Church Hill. This would provide a safe route for cyclists and pedestrians to get to the Town Centre – it never seems to come up as an option. This would genuinely create more sustainable transport options for those who live there.	This option for development has not been investigated as development in these locations would compromise the open linear aspect of the Arrow Valley Park.
Build in the Arrow Valley	
If these houses need to be built upon Bromsgrove land then they should be located closer to Bromsgrove town resources.	See response at Cross Boundary Miscellaneous Key Issue: Alternative locations for development
The WMRSS objective of Urban Renaissance advocated the concentration of development upon city centres/conurbations, near to all sustainable services!	The WMRSS was revoked on 20 May 2013. However, the urban renaissance objective was for the Major Urban Areas to meet their own needs and countering the unsustainable outward movement of people and jobs (to the Shire Counties). Other urban areas within the Region were still expected to meet their own local growth needs.
Build along roadside such as Windmill Drive	Roadside verges were considered for development in the 2008 SHLAA document. In the majority of cases, suitable access onto the road network was not feasible or potential site capacity fell below the SHLAA site size threshold.
Encourage infill development and backland development where appropriate	Every year, the Council approves applications on sites of less than 5 dwellings (i.e. sites which fall below the SHLAA threshold). Currently, small scale infill development on brownfield land accounts for about

Sub Issues	Officer response
	11 completions per annum. A windfall allowance, based upon this figure has been included in the list of commitments to offset the housing requirement.
Encourage modification of existing run-down Council-owned properties in Matchborough, Winyates, Oakenshaw, Church Hill etc into flats to reduce the need for new affordable housing	The Council needs to provide a range of sizes of affordable housing and has a duty of care to ensure that properties are of a good habitable standard. Converting existing stock will not necessarily reduce the need for affordable housing. It is unlikely that a 350 dwellings per annum completion rate will provide the total amount of affordable housing needed within the Borough.
Relocate Plymouth Road golf course to Site 1 to retain Green Belt and redevelop golf course for housing as the site is a similar size to Site 2	Option will be investigated through the SHLAA  <b>ACTION: Add site to 2013 SHLAA refresh</b>
Consider maximising the potential of sites already identified	Sites identified in the SHLAA follow the prescribed guidance for density calculations. It states that capacities of sites should be guided by local level housing densities but where these do not provide a sufficient basis to make a local judgement, one approach to estimating potential is by sketching a scheme. Where sites have come forward by virtue of a planning application, the approved density has been used. As many vacant sites as possible have been 'sketched' by urban designers to determine density. Some sites have been based on density multipliers at the lower end of the density range. Officers consider this gives greater flexibility to meet housing need. If all sites were over estimated at the top of the density range, there is a risk that insufficient land has been identified to deliver the Plan.
Smaller sized sites could accommodate 5 dwellings, or more, if they are in an area where a higher density of development is appropriate. As such a number of potential housing sites may have been omitted from the SHLAA.	If a site does not appear in the SHLAA due to its size, this does not mean that smaller sites cannot come forward for development. In order to estimate this type of housing contribution, a windfall allowance has been included in the commitments figure.
Since 2008 SHLAA there are a number of excluded sites which should be reconsidered and, as such, would contribute to the overall housing figures up to 2030.	As part of BDC working collaboratively to accommodate the shortfall of the RBC housing requirement, officers from BDC scrutinised the RBC SHLAA process to ensure that the Assessment had realistically

Sub Issues	Officer response
	included as much potential development land within the Borough. Overall, BDC was satisfied that the Redditch SHLAA process had been carried out in a thorough and comprehensive manner.
Roxboro House, Mount Pleasant - The building does not contribute to the character of the area and is in a poor condition. As such there would be potential to redevelop the site to provide higher density residential units	This building offered sheltered housing accommodating for the elderly. However, as the accommodation was falling below Council standards, the residents were rehoused and the building sold. It has recently been refurbished for private flats, and conversion of communal space, resulting in a net gain of 3 dwellings.
Premier House, Hewell Road - Council recognises that the NPPF (para 22) states that long term protection of employment sites should be avoided where there is no reasonable prospect of them being used for that purpose. Therefore the site should be recognised as being a deliverable residential site during the Plan period.	This site is located within a primarily employment area and is currently occupied by an active business. It should be demonstrated that there are no alternative business uses for this site before consideration of reallocation for other uses. There is also a need to consider the surrounding business uses and the detrimental effects on those businesses which might arise should residential uses be allowed.
494 Dagtail Lane, Wadbury Hill - If the land proposed for residential use was development there would still be a 0.5km gap between the site and Astwood Bank. This is not an unacceptable impact on the Green Belt. Its assumed the site has been promoted by a land owner/s and as such is deliverable within the Plan period.	Land in this location was dismissed as part of the Housing Growth Study (Area 1).
Community House, Easemore Road - The redevelopment of this entire site could provide a housing development including the parking area to the rear of the building. Further negotiations with landowner may bring the site forward prior to 2030.	Community House is occupied and well used by Voluntary Sector Groups. Revised lease agreements are being drawn up.
Land to the Rear of Poplar Road Shops - Further negotiations with landowner may bring the site forward prior to 2030.	Option will be investigated through the SHLAA <b>ACTION: Add site to 2013 SHLAA refresh</b>
Land East of Longfellow Close - Further negotiations with landowner may bring the site forward prior to 2030.	Biodiversity issues and flooding implications along the Wharrage Park Area. EA approval would not be forthcoming.
Land between Brooklands Lane and Offenham Close - Further negotiations with landowner may bring the site forward for prior to 2030.	Option will be investigated through the SHLAA <b>ACTION: Add site to 2013 SHLAA refresh</b>

Sub Issues	Officer response
Land at Mcdonalds roundabout - Further negotiations with landowner may bring the site forward prior to 2030.	Option will be investigated through the SHLAA  <b>ACTION: Add site to 2013 SHLAA refresh</b>
Land to the rear of Watery Lane and Ravensmere Road - Further negotiations with landowner may bring the site forward prior to 2030.	Option will be investigated through the SHLAA  <b>ACTION: Add site to 2013 SHLAA refresh</b>
Land at Morrisons Superstore and Brooklyn Garage - Site still close to existing residential development on the eastern side of Batterns Drive. It is also close to employment and retail	Option will be investigated through the SHLAA  <b>ACTION: Add site to 2013 SHLAA refresh</b>
Ipsley Court, Ipsley - It is understood that the Law Society is vacating Ipsley Court to move to Birmingham. In light of the identified need for housing and the sites close proximity to existing residential, it would be appropriate for redevelopment.	RBC has an obligation to ensure sufficient employment land is also available up to 2030. Therefore, in the first instance, it is important to consider its reuse for business uses especially for prime sites such as this, in good condition. The ELR process will ensure that long term and unnecessary protection of the site for employment uses is monitored in accordance with NPPF (para.22). Furthermore, the introduction of changes to Permitted Development Rights (30 May 2013) will help to facilitate change of use from office buildings to residential development, for an initial three year period.
Development at Weights Lane would not disturb locals.	Development at Weights Lane forms part of the contribution to meeting the development requirement. Additional land in this vicinity (Area 11 of the Housing Growth Development Study) Identified that some land in this area would only be suitable for employment uses. At this stage, the employment allocation has been met elsewhere.
Build more in the East of Redditch – where business land is.	See response at Cross Boundary Miscellaneous Key Issue: Alternative locations for development
Land at Mike Davis Nursery should be incorporated into a housing scheme with Broadacres Farm	Land in this location has been included within the area identified through the A435 Review to contribute towards meeting the employment requirement.
Land to the south west of Crumpfields Lane between Crumpfields Lane and Pool Farm from the Green Belt would allow sustainable development utilising existing highway infrastructure. This site should	Land in this location was dismissed as part of the Housing Growth Study (Area 3). The Assessment of Area 3 referred only to the land beyond the Webheath ADR.

Sub Issues	Officer response
be removed from the Green Belt (and included within site 213) and so allow it to be used as a small scale housing site which is sustainable as suitable highway infrastructure already exists.	

## KEY ISSUE: Housing Requirement - Meeting Redditch's Housing Need (SHMA)

Sub Issues	Officer response
The target of 6400 dwellings has not been challenged fully	The requirement hasn't been challenged fully; the Public Inquiry will facilitate this opportunity. However, the methodology undertaken to produce the Worcestershire SHMA, follows the DCLG Guidance "Strategic Housing Market Assessments – Practice Guidance" (2007), which sets out a framework that should be followed to develop a good understanding of how housing markets operate. It remains the most up-to-date Guidance for undertaking research of this kind. RBC is confident that the methodology it has adopted is appropriate.
<p>The proposed housing target set by the government is totally ridiculous.</p> <p>Targets are nationally imposed rather than local community views and against the true spirit of the Localism Act.</p> <p>The forecast demand for housing appears to be based on central government top down figures.</p> <p>We were led to believe that this Government believed in de-centralisation only for it then to prescribe how many houses are to be built in every town/county.</p>	The housing requirement is not set by Government; it is derived from the Worcestershire SHMA (2012). This Assessment was commissioned on behalf of the Worcestershire Authorities as part of the Localism Act's initiative to remove top-down development targets and return decision-making to the local level. However, it must be noted that locally derived requirements still need to be based on robust evidence. Localism doesn't mean that development requirements can be set on a whim.
The SHMA was updated in May 2012 to take account of the household projections published in April 2012. The May document identifies a residual requirement for 2013 to 2028 of 6233 dwellings (415 dwellings per annum). It is not clear how this figure of 6233 over	The residual requirement referred to is the incorrect figure. This demonstrates a residual figure based on a dwelling requirement with a base date of 2006 (Figure 4.3).

Sub Issues	Officer response
<p>a 15 year period translates into only a slightly greater figure of 6380 over a 19 year period, particularly bearing in mind that according to the January 2013 statement of 5 year housing land supply, there were only 63 completions in 2011/2012.</p>	<p>The correct dwelling requirement is detailed in Figure 4.1 of the SHMA Annex (May 2012)</p>
<p>Understand from County Council that the SHMA is to be reviewed imminently following publication of the latest DCLG household projections in April 2013. In turn, the Local Plan dwelling requirement should be reviewed so that the Plan meets the full, objectively assessed and up to date needs for market and affordable housing.</p> <p>The existing published requirement of 6380 is not explained in the context of the May 2012 SHMA update. Furthermore, with the delivery of only 63 units in 2011/12, the delivery of dwellings within the new Plan period is already 273 down on the annual rate of 336 provided for by the draft Plan. The NPPF requires LPAs to plan for their full, objectively assessed housing needs. At the present time, the draft Local Plan does not provide clear evidence that this is the case.</p>	<p>The draft SHMA revision has a revision date of December 2012 and the range of dwelling requirements remains unchanged. The next revision will be undertaken in December 2013 but this does not mean that Local Plan requirements are reassessed annually.</p> <p>The SHMA Annex figure (4.1) presents a dwelling requirement of 5731 (rounded to 5700) between 2011 to 2028, with an annual requirement of 340 dwellings. The annual requirement has been extrapolated (680 dwellings) to extend the requirement up to 2030. The current under provision against the average annual requirement is addressed in the Five Year Housing Land Supply document.</p>
<p>Redditch does not need a further 3,400 houses. The current UK Conservative Government is repeatedly telling us that the economic recovery will be very slow and take many years to materialize. Examination of the high number of properties for sale or rent in the borough proves we are able to more than satisfy demand for the foreseeable future through the sale and renting of these existing properties.</p> <p>3,400 houses are not needed by Redditch. It is a forecast based on dubious and largely out-dated assumptions of demographic and economic growth. Similar projections have been made and have fluctuated widely. None of them came near the miniscule actual growth contained in the consultant's own report.</p>	<p>The housing requirement is based on expected population growth rather than an economic recovery rate. Population increases still result in the need for additional dwellings irrespective of the economic climate. There needs to be a range of types and tenures of property available for 'churn' in the market place.</p> <p>The SHMA Annex is based on the 2010 sub-national population projections. Previously, the RSS Preferred Option and the subsequent Panel Report, took account of older sets of population projections. The range of dwellings identified over a 20 year period (i.e. 2006 to 2026) has fluctuated between 6600 and 7000 dwellings, based on different population projections. The housing requirement figure produced in the SHMA Annex is not considered to be significantly different from</p>

Sub Issues	Officer response
<p>6,000 is unsustainable and the study must be re-visited and more realistic figures used. Need to understand the basis of future housing requirements/ numbers.</p> <p>Must reject the number of housing requirements set by government. How can RBC accept a proposal of the amount in question when it cannot physically be accommodated?</p> <p>Is it true that the government has instructed Redditch BC to build 6400 when they can only accommodate 3000?</p> <p>The SHMA is nothing more than a prediction. It gives a figure well in excess of natural growth of the resident population. It appears to be aimed at attracting additional population from outside the area to compete for jobs and services with current Redditch residents with consequential pressure on the infrastructure.</p>	<p>previous projections, the difference relates to the Plan period (2011 to 2030 - 19 years). Therefore the 6400 figure is not considered to be unrealistic.</p> <p>Redditch has limited capacity within its administrative area; however administrative boundaries should not be seen as barriers to meeting need where capacity is limited.</p>
<p>SHMA authors understand that forecasting during such uncertain times is very difficult</p>	<p>Noted</p>
<p>The figure arrived at is well above the need for the natural growth of Redditch and is aimed at attracting in-comers who will compete with current residents for jobs and services. This is clear from the policy statement 2, <i>“Redditch Borough Council, as Local Planning Authority, has an important role to play in ensuring that sufficient homes are provided to ensure everyone has access to a home that meets their needs”</i>. Please note the use of the word "everyone". Not Redditch residents, or Redditch residents and their families, but "everyone" who sees Redditch as a place of cheaper housing compared to the rest of Worcestershire. The figures should be revised to address the genuine needs of Redditch People and not use up the green spaces so enjoyed by local people to house those with no interest in</p>	<p>This is not the case; refer to previous explanations of SHMA projections. The policy introduction wording clearly appears onerous.</p> <p><b>ACTION: Alter policy introduction from ‘everyone’ to ‘Redditch’s growing population’</b></p>

Sub Issues	Officer response
Redditch other than a cheaper house.	
Redditch population according to the SHMA Fig 4.2 has only 156 during the period 2001-2009 an average annual growth of 20 during economic boom. Unlikely that an influx of population or that residents have ability to live independently.	The Census 2011 figures are more accurate than mid-year estimates but were unavailable at the time the SHMA was prepared. The population increase during the 2001 to 2011 Census period for Redditch was 5407
The planned figures suggest Redditch will grow by 25% over the period which cannot be sustained by other local facilities such as hospitals.	Infrastructure providers have been consulted as part of the preparation of this proposal and area aware of the amount of development needed and population changes up to 2030. Therefore, any decisions taken with regard to infrastructure provision have been taken with knowledge of population changes and increases in mind.
80,000 people – Redditch’s approximate size now, is enough.  It appears the intention of the Borough Council to provide for natural expansion of Redditch or to force massive unnatural growth to the detriment of current residents	The population demographic is changing. People are living longer and we have an increased aging population. The country is also experiencing a baby boom at the moment, which is also affecting the growth rate.
We have a disproportionate ageing population compared to the rest of Worcestershire, many in private or rented family size homes unable to move to bungalows due to much higher purchase cost or lack of suitable rental accommodation.	The SHMA indicates that smaller properties are needed to address this issue.
We have a large young adult population, many of those who are working do so on low wages making it difficult for them to save a deposit to access the new "affordable" rent/buy housing association schemes that have all but replaced new council houses.  Benefit penalties for underutilization, will lead to less pressure for young people to move out. This couldn’t have been considered in SHMA process. This will increase the average household size, thus reducing the number of households.  Homes more expensive and residents not wealthy. Living as individuals will become more difficult (the average age of children	A proportion of Housing Association properties are provided for social rent. Occupants are housed from the Council’s housing waiting list.  The SHMA Annex (p.16) addresses these issues. One of the key drivers behind a projected fall in household size is the continuing aging population and the move towards higher numbers of single and couple older households.



Sub Issues	Officer response
leaving home increasing). This will increase the average household size, thus reducing the number of households	
People on better wages are migrating to Redditch to access cheaper property; it is for these reasons that no affordable house building here will have any significant impact on the council housing waiting list.	Access to properties from the Council waiting list is related to need. People on better wages migrating to Redditch would not be classed as in high need if they registered on the Council's waiting list.
<p>The requirement is arbitrarily low compared to the economic growth-based requirement of 8,620 dwellings identified by 2012 SHMA and it has not been aligned to any economic growth projections. It is therefore unlikely to reflect true needs.</p> <p>Housing requirements is midway point between the lower and upper ranges in the SHMA. The Council gives no explanation of its decision to choose a midway figure rather than the upper figure. Provide further justification for its decision making.</p>	The SHMA presented a spectrum of potential future outcomes for consideration in the development of locally appropriate policy. The employment-constrained scenario was one of these. RBC chose to meet its natural growth (migration-led scenario) as opposed to encouraging in migration associated with employment driven scenarios, which result in a higher population and subsequently, a higher housing requirement, but this is not an arbitrary requirement, it is objectively assessed and meets identified need.
<p>There are less than 900 live families on the Council housing waiting list. Therefore that is the real need.</p> <p>No real evidence to support the need for the proposed housing numbers. There is a big difference between need and desire.</p>	That represents the need for public sector housing. There is also a need for additional dwellings for the private sector. The population structure is changing, people are living longer, and families are splitting. This creates additional housing need.
The indication that the proportion of affordable housing stock in the Borough may need to be reduced to reflect "the fact that the authority already contains a comparably high proportion of affordable properties, 22% of stock compared to a national average of approximately 20%" (paragraph 4.3) is particularly concerning.	Affordable housing stock does not need to be reduced. This paragraph in the SHMA recognises that Redditch has a high demand for affordable housing which it needs to meet. It refers to ensuring we maintain a balanced housing market and should also be ensuring enough open market housing is delivered to maintain a balanced market.
There is substantial unmet need for additional affordable housing in the District, as shown by the need for 3,192 dwellings over the Plan period in Redditch alone (further need is identified for 4,161 affordable dwellings in Bromsgrove District). The NPPF requires "the full, objectively assessed needs for market and affordable housing in	Concerns noted. However, officers consider that the SHMA openly and transparently considers the full and objectively assessed housing need for both private and affordable dwellings and there has been no manipulation of the numbers of open market housing to constrain affordable housing. Furthermore, the Plan proposes that this identified

Sub Issues	Officer response
the housing market area” to be met (para. 47). Any artificial manipulation of the numbers of open market housing simply to lower the total proportion of affordable housing in the District would be contrary to the aims of national policy, as well as unhelpful to those affordable housing providers seeking to meet need in the area.	need is met.
Redditch needs 1 and 2 bedroomed houses for first time buyers	<p>The SHMA Appendix for Redditch (2012) (p.43) identifies that the changing age profile of the projected population of the authority indicates that there will be a high demand for smaller properties able to meet the needs of older person households. Overall the number of older persons is projected to increase significantly, indeed the projections suggest that older persons will make up approximately 27% - 28% of the total population by 2030 compared to just under 16% now. In addition to older person households the projections also indicate that in order to maintain a level of working age population to match employment opportunities that there will be a sustained need for family housing within the authority.</p> <p>Furthermore, the SHMA is updated annually, therefore if the housing needs of the population change during the Plan period, the appropriate size and type of dwelling can be negotiated at the planning application stage of any development.</p>
Why is the housing target based on a continuance of previous build rates? What is the basis for this? The assumptions are flawed	The housing requirement is not based on a continuance of previous build rates; it is based on the figures derived from the SHMA (see ‘SHMA Guidance’ response above).
Does the housing provision figure represent Redditch’s need or Birmingham overspill	The housing requirement reflects the needs for Redditch related growth only, not Birmingham or Bromsgrove overspill (see ‘SHMA Guidance’ response above).
Why should we have overspill from Bromsgrove	Capacity and Need are different things. Redditch has limited capacity within its administrative area; however administrative boundaries should not be seen as barriers to meeting need where capacity is
Stop building when there is no capacity. How can houses be needed if there is no capacity within Redditch? Allow only infill building	Capacity and Need are different things. Redditch has limited capacity within its administrative area; however administrative boundaries should not be seen as barriers to meeting need where capacity is

Sub Issues	Officer response
	<p>limited.</p> <p>The SHLAA identifies as much land as possible for development within Redditch's urban area. Infill development continues to come forward on an annual basis and is estimated as windfall contributions towards meeting the need.</p>
<p>Does housing need relate to immigration?</p> <p>Within this figure is a large figure for international migration. Historically there has been an inward influx of immigrants into Redditch, to fulfil the requirements of local workforce. Some of these have stayed as permanent residents but a lot have returned or moved. The main focus of the immigrant labour was for the manual or semi skilled jobs, The Strategic Housing Market Assessment Feb 2012 (SHMA) figure 7.12 Occupation Change shows a decline in the Trades Occupations, process operatives and elementary occupations; (SHMA) fig 4.13 shows a drop in employment by 2031 of up to 4% compared to 2006 highs; both suggest the draw for unskilled labour from far afield will be less; Coupled with the factors that central government makes work pay and benefits are becoming more difficult to get, competition for local jobs will be greater. The fact the Redditch is losing population to immigration is accepted in the SHMA.</p>	<p>The SHMA projections are based on ONS population projections. ONS strives to improve its estimation methodologies to ensure the most accurate data on immigration and emigration. This is a national consideration within population projections and not limited to Redditch.</p> <p>The SHMA has taken account of migrant movements for the duration of the Plan period when calculating dwelling requirements.</p>
<p>People are migrating out of Redditch to find jobs</p> <p>Several years ago in the time of the 'regional strategy' Redditch planners claimed that there was net migration from Redditch</p> <p>* If this is the case we do not need 7000 - a more realistic figure would be 3000 which could be accommodated within Redditch boundaries</p>	<p>SHMA Annex (2012) (p.8) states "With the exception of the period 2009/10 – 2011/12 migration (internal and international migration) is projected to have a small combined positive net effect on population growth (figure 2.3). The negative trend evidenced between 2009/10 and 2011/12 is likely to have been driven by the effects of the recession, with the reduction in employment opportunities serving to result in a larger flow of migrants out of the authority to seek work opportunities elsewhere. The longer-term projections evidently do not</p>

Sub Issues	Officer response
	see this net outflow of migrants continuing in the future, although it is important to recognise that the population projections do not build in assumptions around the relative health of the economy.”
Are the Government’s population projections inaccurate	The ONS population projections are the industry standard.
I see no reason why Bromsgrove land has to be used for development to meet requirements of expansion of Redditch until all available land within Redditch has been fully built and completed	<p>Despite the SHLAA identifying land for around half of the housing requirement within Redditch, not all of these sites are considered to be deliverable immediately, or within the first half of the Plan period.</p> <p>Redditch needs to demonstrate a 5 year supply of deliverable housing land. At the moment, Redditch cannot do this based purely on the sites within the Borough. If Redditch is in a position where it cannot demonstrate a 5 year supply of housing land, then the Council is failing to comply with paragraph 47 of the NPPF. Non-compliance risks the Plan not being found sound.</p>
The current government plans pre date the recession and need to be updated to reflect the low growth scenario the UK is facing over the next decade before any decision is made on housing requirements in the areas proposed.	Yes, the WMRSS housing target did predate the recession. The SHMA (2012) takes account of more up to date population projections. The Plan period will run from 2011 up to 2030; in this period, it is expected that growth scenarios will experience ‘peaks’ as well as ‘troughs’. The housing requirement reflects these market conditions throughout the whole of the Plan period.
The West Midlands RSS Review 2 Panel recommended that housing provision for 2006-2026 within Redditch should be at least 4,000 dwellings, with an additional 3,000 provision needed to meet the needs of Redditch adjoining the town’s boundary where Green Belt adjustment would be required.	<p>Noted.</p> <p>As planning moves towards locally derived development requirements, the relevant evidence on housing need underpinning the WMRSS is being replaced by more up to date locally derived targets. The Plan period has been adjusted (2011 to 2030) to reflect a reasonable projection forward from Plan adoption of at least 15 years. Other Government guidance states that Plans should be forward-looking and avoid covering the period from 2006 if Plans were not currently adopted.</p>
The NPPF seeks Local Planning Authorities to boost housing growth,	Noted.

Sub Issues	Officer response
i.e. not restrain growth, and in the absence of Regional Plans there is a duty to co-operate including within the context of Local Enterprise Partnerships (LEPs).	
Recognise the wider Greater Birmingham & Solihull LEP that in the context of emerging plans, there is likely to be a housing shortfall of about 50,000 homes over a 20 year period to 2033 below the objectively assessed need, due principally to under-provision within Birmingham.	RBC is part of this LEP area and as such is involved in the commissioning of evidence to understand the level of need and the scale of any shortfall or under-provision from Birmingham.
Given the RSS undersupply from 4000, and the LEP undersupply suggest that the housing requirement on the policy is stated as a minimum figure. Suggests that paragraph 1 of Policy 4 is revised as follows "Provision is made for the construction and completion of at least 6,380 dwellings between 2011 and 3030 to meet the local housing requirements identified in the Strategic Housing Market Assessment."	Noted.  <b>ACTION: change policy wording from 'around 6380 dwellings' to 'a minimum of 6400 dwellings'</b>
The objective assessment should identify the full need for housing before the Council consider undertaking any process of assessing the ability to deliver this figure.	This is the case. The SHMA identified the need and the SHLAA assesses the capacity for delivery.
If the local planning authority has not provided sufficient homes to meet its RSS target, then there is a need to ensure that the housing requirement includes an element to address backlog. Under supply of housing against the RSS target of 350 dpa in Redditch equates to a shortfall of 952 units for the period 2006/07-2011/12.	There is no backlog or under provision. The original RSS plan period would have run from 2006 to 2026. As such, some of the BORLP3 completions would have counted both within its time frame and within that of BORLP4. The Local Plan period will now run from 2011 to 2030. BORLP3 Plan period ran from 1996 to 2011, thus resulting in no overlap of Plan periods/ completions.  Any under provision within the Plan period will be dealt with in the Five year housing land supply document.
Delivery of any shortfall should be made up as soon as possible, and in the absence of evidence to suggest a longer timescale, within the first 5 years of the plan.	This is dealt with in the Five year housing land supply document. However, it should be noted that a recent Inspectors decision (Development Control Services Bulletin, 31 May 2013, A. Pykett, Hinckley and Bosworth) concluded that in the current economic

Sub Issues	Officer response
	climate it was more realistic to spread the shortfall over the remaining plan period rather than compounding the issue in the next 5 years.
Concerned that assumptions in the Redditch SHMA Overview Report (Section 4) are not fairly reflective of the realities of housing need and future delivery in the area	Concerns noted. However, officers consider that the SHMA openly and transparently considers the full and objectively assessed housing need for both private and affordable dwellings. Furthermore, the Plan proposes that this identified need is met.
The consultation document provides no evidence of independent market forecasts for North Worcestershire area.	Chapter 5 of the SHMA (2012) addresses the active property market and includes the views of local estates agents (p.100).
Whilst there may be targets between now and 2030, longer term issues need to be addressed for the period between 2030 – 2060 or 2060 – 2090, and the impact this will have for future generations.	Longer term development needs should be considered in accordance with national policy and ideally the wider strategic framework. At this point in time there are no predictions of need or delivery aspirations to guide provision as far ahead as suggested. RBC is a member of two LEP areas and will work with its partners to deliver future development needs.
2,800 houses at 5.25 year is some 533 dwellings/year.	The 2800 dwellings form part of the overall housing requirement for Redditch of 6400 dwellings up to 2030, which equates to an annual provision of around 340 dwellings per year.
<p data-bbox="192 865 1115 898">Why does the NPPF have to be accepted?</p> <p data-bbox="192 932 1115 1061">The NPPF ‘requires’ 5 years’ worth of housing land, yet 2030 is 17 years away and Redditch has capacity for 3,000 out of 6,400.why the urgency regarding Foxlydiate? Is there a hidden agenda to build 6,400 by 2030?</p>	<p data-bbox="1124 865 2056 994">The NPPF sets out the Government’s planning policies for England and how they are expected to be applied. Planning Law requires that the NPPF is taken into account when preparing local plans. Non-compliance risks the Plan not being found sound.</p> <p data-bbox="1124 1027 2056 1331">The NPPF requires a 5 year supply of land to be available for immediate delivery. The NPPF also requires that plans are prepared for an appropriate time scale, preferably 15 years from adoption. Hence the preparation of a Plan now up to 2030 – adoption in 2014 would require a Plan’s forward projection to at least 2029. At the moment, not all of the sites identified within Redditch are immediately available and as such, Redditch cannot demonstrate a 5 year supply of deliverable land. There isn’t a hidden agenda to build 6400 dwellings by 2030, this is the overall need up to the end of the Plan</p>

Sub Issues	Officer response
	period.

KEY ISSUE: Lifetime homes

Sub Issues	Officer response
Policy 4 is onerous. Consider viability in the context of other expected costs including affordable housing and infrastructure costs, including potentially a Community Infrastructure Levy.	This will be considered as part of the Plan viability testing.

KEY ISSUE: Policy wording

Sub Issues	Officer response
In Policy 4 the word “around” is vague. Re-consider the wording of this policy. Policy 4 should be changed from “around” 6,380 dwellings to a “minimum” of 6,380 dwellings.	In order to align policy wording with that proposed in the cross boundary growth policy, this alteration will be made.  <b>ACTION: change policy wording from ‘around 6380 dwellings’ to ‘a minimum of 6400 dwellings’</b>
These additional costs should be included in viability assessments and ref to DCLG Assessing the cost of lifetime homes standards July 2012	This will be considered as part of the Plan viability testing.
Not aware of any intention of the Government to make lifetime homes mandatory, therefore delete this reference	Noted that mandatory requirement is unlikely to materialise in 2013.  <b>ACTION: Remove reference to mandatory introduction from policy</b>
Policy refers to cross border provision of 3,400 dwellings in Bromsgrove District, but no reference made to cross border co-operation from Stratford-on-Avon DC in order to deliver housing within Redditch Borough.	Redditch Borough Council is not relying on a residential contribution towards the housing requirement from Stratford-on-Avon DC as there is no function for allocating sites in Stratford’s Core Strategy until Stratford complete an allocations DPD. However, a contribution towards meeting the employment requirement is expected from Stratford-on-Avon DC and will be acknowledged appropriately in both policy and the Duty to Cooperate Statement.

KEY ISSUE: Flexibility and contingency in the policy

Sub Issues	Officer response
5 year land supply document demonstrates that Redditch has only a 3.4 years supply. Para 49 of the NPPF states “relevant policies for the supply of housing should not be considered up to date if the LPA cannot demonstrate a five year supply of deliverable housing sites.” There’s no contingency planning if every SHLAA site comes forward, and no five year supply.	The Plan makes allowance for minimum requirements on two large scale sites to meet any shortfall that currently cannot be anticipated

### Policy 5 – Effective and Efficient Use of Land

KEY ISSUE: Support for the Policy

Sub Issues	Officer response
English Heritage supports the policy and is pleased it takes into account local character and environmental quality in determining the appropriate densities.	Noted

KEY ISSUE: Density

Sub Issues	Officer response
Build less houses as the estates are a maze	Building fewer houses is not really an option based on the housing need figure derived from the SHMA.  The solution should be controlled through the implementation of BORLP4 Policy 39 (Built environment) and Policy 40 (High quality and safe design) where the design and layout of developments can be enhanced through the planning application process.
Consider density on a site by site basis reflecting local circumstances and character	The policy allows for this at paragraph 2, if applicants can demonstrate that meeting density requirements would be detrimental



Sub Issues	Officer response
	to the surrounding area.
Densities between 30 and 50 dph achievable, but market likely to deliver at the lower. Lower density can serve different sectors in accordance with the NPPF.	Past delivery rates indicate a range of densities have been achieved, some above and some below the 30-50 dph range.
Where a site comprises multiple development areas, the density requirement should be across the site as a whole, allowing some parts of a site to be lower density and other parts higher density as appropriate.	Noted. This tends to be the case based on previous large/ multiple development sites.
NPPF states that to be sustainable, plans must be deliverable. Don't frame policies so that they may make development unviable	The policy allows for this at paragraph 2, if applicants can demonstrate that meeting density requirements would be detrimental to the surrounding area, which allows flexibility in the policy to ensure development remains viable.
Densities over 35 dph are likely to impose the need for apartments as part of the development mix. Apartment schemes are more difficult to obtain development finance for so take account of viability	Noted. SHMA does indicate that Redditch has a need for 1 bed (probably flatted) properties. Viability will be taken into account as stated at paragraph 2 of the policy.
30% of housing stock is rented, the biggest percentage in the county. SHMA appendix 4 point 3.2 shows a need to build larger properties	Noted. The SHMA is updated annually and will reflect the most up to date housing needs over the Plan period.
SHMA figure 7.12 Occupation Change shows a largest increase in professional occupations, Managers and Senior officials, suggesting a need for appropriate housing to attract these professionals, demand will be for 3, 4 and 5 bedroom properties	Noted. Planning applications within Redditch currently provide for a range of property sizes. This is not expected to change as the Plan period progresses.
Largest percentage of Asian residents in Redditch, which tend to have larger families meaning there will be a greater demand for larger homes	<p>Less than 5% of the Redditch population falls within the 'All Asian or Asian British' Census group. The demand for larger homes to meet the needs of this population sector is not expected to be significantly high. However it is acknowledged that to meet the needs of larger family accommodation, there will need to be some flexibility with respect to meeting density requirements.</p> <p><b>ACTION: Introduce flexibility in the policy to allow for lower density development which meets an objectively assessed housing need.</b></p>

Sub Issues	Officer response
Large numbers of commuters relying on a car so include provision for car parking which impacts on density	Parking standards are determined through the Worcestershire Local Transport Plan 3 (Highways Design Guide).
A number of sites are shown for development at a density of 30 dwellings per hectare or less. For example, the A435 ADR site which is 10.25ha is shown as providing only 200 units, which is a density of 30 dph over 65% of the site. Webheath ADR area is being considered at a density of 25 dph over 65% of the site. These would appear to be particularly low overall densities for such large sites.	These are gross site areas and net developable areas need to be determined, taking account of environmental and other constraints. Further work at the A435 has indicated a specific developable area, which will be reflected in the 2013 SHLAA update.  <b>ACTION: Update SHLAA to reflect capacities/ densities</b>
Redditch has lowest number of properties in council tax band F,G & H (Figures from 2011 <a href="http://www.neighbourhood.statistics.gov.uk">www.neighbourhood.statistics.gov.uk</a> Redditch 4.45 %; Bromsgrove 15.93 %; Wychavon 18.28 %)	Noted.
Redditch has a very small percentage of bungalows. Bungalows take up large plot sizes, if the minimum density was imposed, unlikely to increase bungalow provision	Noted.  <b>ACTION: Introduce flexibility in the policy to allow for lower density development which meets an objectively assessed housing need.</b>
Crime rate in Redditch is high and increasing against the national trend and this is concentrated in areas of high housing density - crime feeds on urbanisation which is being promoted.	Policy 40 High Quality and Safe Design would address these issues. Planning applications would involve consultation with the Community Safety Team and the Crime Risk Manager
It is essential that the policies within the Local Plan assist in bringing sites forward and do not set unrealistic aspirations. The requirement of 30-50dph across the Borough (and 70 dph adjacent to town centres) should be set as aspirational targets subject to site-specific considerations, and not as minimum development densities. It is therefore proposed that paragraph ii is amended to:  <i>“ii. the appropriate density of development will be determined on a site-specific basis following consideration of detailed design matters and landform. The Council will seek densities of 30-50 dph across the net developable area of sites except for on sites within and adjacent to town and district centres where higher densities may be</i>	Officers consider that the proposed policy amendment does not clarify the policy any better than the existing wording. Paragraph 2 allows for densities outside of the 30-50dph density range, based on detrimental impacts for the site and surrounding area.

Sub Issues	Officer response
<p><i>appropriate.”</i></p> <p>The text should also be amended to make it clear that, whilst the SHMA is an assessment of Borough-wide housing needs, the precise housing mix will be negotiated to take account of local needs when sites come forward in order to utilise the knowledge of house builders appropriately.</p>	<p>The SHMA does not specifically set out a precise housing mix for sites. It is reasonable to assume that these details would be discussed as part of the planning application process, including the precise mix of affordable housing.</p>
<p>The RJ states that one of the most important considerations will be the retention of the existing character of residential areas. The southern side of the Webheath ADR backs on to Crumpfields Lane. The properties along Crumpfields Lane are in the main, individual designed character dwellings, with large gardens (many ½ acre in size). Any development at the indicative density proposed for the Webheath ADR will result in failure to meet the requirements of this policy, and thus by virtue of the policies own criteria should be refused.</p>	<p>This is not the case. The policy allows for local character and constraints of a site to be considered in context. This will ensure that the character of the surrounding area and the sites physical constraints will be afforded careful attention before higher density development is considered in a location which might not lend itself to such development levels. With respect to the Webheath ADR, it could be argued that the existing development to the north and east of the site provides higher density development than Crumpfields Lane. Therefore it is important that all local characteristics and constraints are considered holistically.</p>

## KEY ISSUE: Previously Developed Land

Sub Issues	Officer response
<p>Brownfield sites should be developed before green field sites.</p>	<p>Redditch does not have sufficient brownfield sites to meet its five year housing land supply. Therefore an amount of greenfield sites need to be available and deliverable alongside the brownfield sites in order that the land supply can be met. Some redevelopment of brownfield sites can have longer lead-in times due to issues of mitigating against contamination, for example. Officers continue to liaise with landowners to develop delivery strategies for sites to ensure timely delivery.</p>
<p>Make better use of brownfield land</p>	<p>The reuse of brownfield land is actively encouraged in the draft BORLP4 Policy 5 (Effective and efficient use of land).</p>

Sub Issues	Officer response
	<p>During the BORLP3 Plan period, Redditch BC had a Structure Plan target of 25% of its residential development to be built on brownfield land. By the end of the Plan period (1996 to 2011), 51.3% of housing completions were on brownfield land.</p> <p>This completion rate now leaves Redditch with less brownfield land to develop during the BORLP4 Plan period. The SHLAA identifies as much land as possible for development within Redditch's urban area. Of the 3011 dwellings identified within the 2012 SHLAA update, only around 400 can be accommodated on brownfield land.</p> <p>The SHLAA is updated on an annual basis and consideration is given to the inclusion of appropriate brownfield sites, which could contribute towards meeting the housing requirement.</p>
<p>In the RJ there is reference to prioritising the re-use of PDL contrary to the NPPF. Para 17 of the NPPF encourages reuse of PDL first but not to give it preference.</p>	<p>Officers do not consider that the RJ prioritises the re-use of PDL. The RJ states that re-use of PDL should be encouraged and explains why a PDL target has not been set for this Plan period in accordance with the advice in NPPF para 111, which states <i>"Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land."</i></p>

## KEY ISSUE: Contaminated Land

Sub Issues	Officer response
<p>recommend inclusion of a reference to protecting the water environment i.e. appropriate level of site investigation, remediation and validation for Previously Developed Land ('PDL') where there has been a previous potentially contaminative use. You could include:</p> <p><i>... "demonstrate that land contamination issues have been fully</i></p>	<p>Noted and agreed.</p> <p><b>ACTION: Amend policy to reference treatment of contaminated land</b></p>

<p><i>addressed. Development proposals on contaminated land should demonstrate that it is capable of appropriate remediation without compromising development viability or the delivery of sustainable development”.</i></p> <p>The above is in accordance with paragraph 109* of the NPPF , to protect ‘controlled waters’</p>	
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### Policy 6 – Affordable Housing

KEY ISSUE: Support for 30% contribution

<b>Sub Issues</b>	<b>Officer response</b>
The expectation of a 30% affordable housing contribution is likely to be reasonable, subject to site-by-site viability considerations and evidence	Support noted.

KEY ISSUE: Affordability issues

<b>Sub Issues</b>	<b>Officer response</b>
Substantial unmet need for affordable housing in both Redditch and Bromsgrove. 30% target wouldn’t ensure the full extent of need would be met across the Plan period; an affordable housing target of 50% would be needed. 30% target will yield just 60% of the affordable housing need (1,914 of 3,192)	Site viability needs to be considered to ensure affordable housing is delivered. Setting the target too high would result in less affordable homes being delivered.
If evidence base suggests a certain level of affordable housing is required and the LPA are not seeking to address this then the affordability gap will only get worse.	The delivery of new affordable housing is a significant method of addressing affordable housing needs in the Borough but it is not the only method. The Council will continue to work with partners and stakeholders to make effective use of the current housing stock to assist in meeting the affordable housing demand.
SHMA estimated net affordable housing need of 168 dwellings per annum. Total is therefore 168 x 19 years = 3192. Policy 6 at 35%	The SHMA is reviewed on an annual basis and has a 3 to 5 year life. The SHMA is not designed to be used as a multiplier over 19 years.

<p>provision on 10 or more dwellings will delivery only 1914 (6380 x 30%) a shortfall of -1278. If the high SHMA scenario was used, of 8260 provision would only be -606 short (8260 x 30% = 2586 then 3192 – 2586 = 606)</p> <p>The housing requirement will significantly constrain the scope for addressing affordable housing needs.</p>	
<p>Redditch does not look for affordable housing contribution on sites of less than 15. Continue this as Redditch does not impose a maximum number of affordable houses that may be developed, there are sites developed at 100 %, therefore to maintain a balance a certain number of 100% privately owned sites needed. AHVA table 5.1 show sites of 10-14 only account for 58 (2%) properties but do unduly apply pressure on small builders</p>	<p>The AHVA concluded that there is no evidence to indicate that viability of smaller sites is a problem and that there is a case for a threshold significantly lower than 15 dwellings (para 7.31). The policy is flexible enough to review site specific viability should the need arise.</p>
<p>Redditch has the largest percentage of affordable housing in the county at 22% (Worcestershire SHMA fig 3.4). Ensure a better balance so Redditch doesn't attract residents from neighbours.</p>	<p>The Council's allocations policy determines priority for housing. The Council's housing need requirement only includes local need not need for other areas.</p>
<p>Scrutinise the housing waiting list to see who is in need and not just desire</p>	<p>The SHMA only takes into account those on the waiting list that have a significant housing need to ascertain the affordable housing need of the Borough, not those who just have a desire for housing.</p>
<p>Provision of affordable units like Redditch has doesn't not impact on the housing waiting list</p>	<p>The Council relets approx. 400 units per year to applicants on the Council's waiting list.</p>
<p>Target for affordable should be less than neighbouring Districts so that we don't become the affordable housing solution</p>	<p>The Council's proposed 30% is lower than neighbouring districts.</p>
<p>SHMA (fig 7.12) says economic growth is going to be with incomes above that that require social housing, there is not the economic driven requirement for increased social houses</p>	<p>The figure shows that there will be an increase in better paid jobs from 2010 – 2031. This figure only relates to change in numbers however there will continue to be lower paid jobs which will require affordable housing to ensure residents can access suitable housing.</p>
<p>Apply exemption to PDS for affordable contributions for viability reasons</p>	<p>The policy is flexible enough to review site specific viability should the need arise.</p>
<p>Target the type of affordable housing to address the issue of people in the wrong sized property by delivering bungalows/older persons</p>	<p>The Council seeks to provide affordable housing which meets the needs of the Borough to ensure the maximisation of current stock.</p>

accommodation	
Whilst the target of 30% affordable housing is noted, it is vital that the ability to take account of site specific viability is retained through to the adoption of the Local Plan in order that development is not held back by onerous requirements for planning contributions. The NPPF is clear in paragraph 173 that, ‘... the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.’	Noted. The policy is flexible enough to review site specific viability should the need arise.
Only a small amount of social housing is necessary in Redditch, which could be accommodated on brownfield sites in and around Redditch.	The SHMA indicates that the Borough requires a net annual need of 168 units per year of affordable housing.

## KEY ISSUE: Split/differential contributions

<b>Sub Issues</b>	<b>Officer response</b>
Accepted that 30% figure is based on viability, but the Viability Assessment indicates that 40% is still achievable in the rural areas, presenting a “three way target [... of ...] 40% affordable housing in the Rural South, 30% target in Redditch West and the Town Centre and a 15% affordable housing target in Redditch East” as an option (paragraph 7.23). We cannot see why this option has been rejected in favour of a blanket target. As the CIL Regulations specifically allow for differential rates to be set based on clear viability evidence, it would appear useful to seek to apply those identified in the Viability Assessment to support consistent, viable delivery across the Borough.	<p>The Viability Assessment presented three options for consideration. The option to apply a blanket target of 30% offered the maximum provision of affordable dwellings for the Borough based on the location of the sites within the Housing Market Areas used in the Report. No sites have been identified within the rural area, therefore 40% of nothing wont deliver affordable housing.</p> <p>The Council has set a target of 30% which can be reviewed should a site show that the affordable housing requirement will make the site unviable.</p>
Support the Council instead making use of the differential housing targets proposed in the Viability Assessment, and for these targets to be expressed as minimums.	Support noted.

<p>The range in land values mean that affordable housing contribution shouldn't exist across the town, use sub market percentages suggested for the financial contributions. This would be more consistent with the AHVA comments at 3.4 "Variation in house prices will have a significant impact on development economics and the impact of affordable housing on scheme viability"</p>	<p>Noted and agreed. However, it should also be mentioned that the policy is flexible enough to review site specific viability should the need arise. A percentage would be proportionate with the variation in house prices across the Borough. The NPPF also states that a financial contribution should be of a broadly equivalent value to on-site provision.</p> <p><b>ACTION: Use 30% as a percentage for financial contributions across all sub markets as indicated in Option A of the AHVA (p.39) and the NPPF in line with the 30% on-site contributions sought for sites of 10 or more dwellings</b></p>
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## KEY ISSUE: Affordable housing viability

Sub Issues	Officer response
<p>Support policy wording that makes allowance for site-specific negotiation on viability grounds, but note that these changes would reduce the administrative burden on case officers at application stage, with the use of clear targets offering certainty to developers.</p>	<p>Noted.</p>
<p>The Housing viability report lacks transparency so it's difficult to assess whether an accurate viability assessment has been concluded.</p>	<p>Officers are unclear where this document lacks transparency. It clearly sets out methodologies and draws detailed conclusions in Chapter 7.</p>
<p>BICS build costs are only basic costs and do not include external structural or local site works. Costs also don't factor in proposed mandatory changes to Part L of the Building Regs. Ref to DCLG cost of building to CFSH updated cost review (2011)</p>	<p>Page 10 of the Toolkit has made allowances through user defined fields for additional costs to be factored into the Model if necessary.</p>
<p>Page 58 of Andrew Gollands report there is no allowance for site acquisition costs such as land agent fees, legal fees and stamp duty.</p>	<p>Officers understand that these should be entered as part of the professional fees/ marketing fees. The Toolkit has made allowances through user defined fields for additional costs to be factored into the Model if necessary.</p>
<p>The sales and marketing costs used are set at lowest percentage of 3%, challenging in current market</p>	<p>The Toolkit offers the user the opportunity to override the assumptions in the 'User defined' column to address this issue.</p>



Andrew Gollands report doesn't clarify if gross or net site areas have been used, concerning given land lost for suds and GI.	This is based on a net site area.
On page 63 of Andrew Gollands report the worked example includes payment for affordable social housing units. This is overly optimistic as grants may not be readily available to RSLs in the future. A viability appraisal with no grant inclusion may have drawn different results.	These fields should be left blank if grant is unavailable.

KEY ISSUE: Affordable housing as part of the housing trajectory

<b>Sub Issues</b>	<b>Officer response</b>
Include affordable housing within the housing trajectory, as required by the NPPF, and for this to be supported by an implementation strategy. This will support the Council's monitoring functions, and allow for 'trigger' points to be defined for policy review	Noted and agreed. This can best be implemented through the annual housing monitoring platform.  <b>ACTION: Improve affordable housing monitoring with Housing Strategy officers</b>

KEY ISSUE: Housing tenure

<b>Sub Issues</b>	<b>Officer response</b>
Support the policy approach to housing tenure, but seek further flexibility to allow for more site or area-specific housing needs to be met, without relying on the Council commissioning an additional assessment. Suggested amendment "On-site provision should be made and must incorporate a mix of dwelling types and sizes, which reflect the site's characteristics, the development as a whole, and meets the needs identified in the Borough Council's most up to date Strategic Housing Market Assessment or other up to date local housing need surveys."	Noted and agreed.  <b>ACTION: Amend policy wording to add "or other up to date local housing need surveys, and in consultation with the Council's Housing Strategy Team."</b>

**Policy 7 – Gypsies, Travellers and Travelling Showpeople**

## KEY ISSUE: Provision of sites

Sub Issues	Officer response
Provision in line with any current assessment should represent the minimum level of provision.	Provision of sites will be made in line with the CLG guidance 'Planning policy for traveller sites' and based on an assessment of need (which is currently being carried out). The CLG guidance requires pitch and plot targets to be set which address the needs of travellers; it does not state this should be the minimum level of provision.

## KEY ISSUE: Policy wording

Sub Issues	Officer response
The policy should make it clear that the criteria for new sites will apply to proposals which come forward through planning applications as well as to site allocations.	Agreed  <b>ACTION – include in RJ that the criteria apply to site allocations and planning applications</b>
Criteria ii is unnecessary, ambiguous and too onerous.	The criterion requires the use of Previously Development Land 'where appropriate'. This is in line with NPPF paragraph 111 which states "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed..."

**Policy 8 – Green Belt**

## KEY ISSUE: Support for policy

Sub Issues	Officer response
Support the position that all the remaining designated Green Belt will be in the south west of the Borough.	Noted
Welcome the acknowledgement in the policy that the exceptional circumstances that are required to amend the Green Belt boundary have been demonstrated.	Noted

KEY ISSUE: Reference to Green Infrastructure

Sub Issues	Officer response
Suggest policy amendment to say that applications for development must demonstrate that they contribute positively to the provision or enhancement of Green Infrastructure in surrounding areas.	The policy states that applications will be determined in line with relevant policies in the plan – this would include Policy 11 Green Infrastructure. It is not considered necessary to make specific reference to Green Infrastructure.

KEY ISSUE: Miscellaneous

Sub Issues	Officer response
It does not appear to be sustainable to have a Green Belt Policy if some of these areas are to be released for future development	The policy and RJ acknowledge that the Green Belt boundary is proposed to be altered during the preparation of Local Plan No.4. The draft policies map shows the revised Green Belt boundary.

### Policy 9 – Open Countryside

KEY ISSUE: Support for policy

Sub Issues	Officer response
Welcome this policy and consider that it is important in directing development to the most sustainable locations whilst allowing for appropriate applications in the open countryside.	Noted

KEY ISSUE: Policy wording

Sub Issues	Officer response
Suggest under point (iv) the opening line is amended as ‘a sustainable use of a rural building’.	It is considered more appropriate to insert the word ‘sustainable’ rather than replace the word ‘appropriate’.  <b>ACTION – point (iv) amended to: ‘an acceptable, sustainable use of a rural building...’.</b>

## KEY ISSUE: Historic Farmsteads

Sub Issues	Officer response
<p>Recommend the policy includes a clear and positive statement on the use of the emerging farmsteads guidance. This might be best incorporated as a new point as for example:</p> <p><i>'All proposals relating to the reuse and development of traditional rural buildings are informed by an assessment of the farmstead as a whole, including its landscape setting, character, significance and sensitivity to and potential for change.'</i></p> <p>The West Midlands Farmsteads and Landscapes Project and the associated Farmsteads Assessment Guidance for Worcestershire could be outlined and referenced in more detail in the supporting text.</p>	<p>Reference to the Farmsteads and Landscapes Project is considered more appropriate in the historic environment section of the Plan. Amendments will be made to the relevant policies.</p>

**Policy 10 – Agricultural Workers Dwellings**

No representations received

## Creating and Sustaining a Green Environment

### Policy 11 – Green Infrastructure

KEY ISSUE: Support for policy

<b>Sub Issues</b>	<b>Officer response</b>
Support this policy and consider that it plays an important role in delivering Objective One of the overarching Plan Vision. Pleased to note the weight given to the need to improve the network for wildlife and the references to the local and Sub-regional GI strategies.	Noted
Appears to be based on a sound evidence base, generally legally compliant and sound and in accordance with the National Planning Policy Framework so far as Natural England is qualified to comment.	Noted
We welcome the emphasis given to flood risk management and 'blue infrastructure'	Noted
Worcestershire County Council (WCC) welcomes the inclusion of the separate policy (Policy 11) on green infrastructure. We support the general tone of the policy which requires new development to safeguard and contribute to the GI network within the borough and to county-wide GI.	Noted

KEY ISSUE: Worcestershire GI Strategy

<b>Sub Issues</b>	<b>Officer response</b>
Welcome reference to the draft Worcestershire GI Strategy. However it would be beneficial to explain how the local GI network fits with the wider GI priorities/overall spatial approach identified in the document.	The GI Strategy for Redditch Borough has not yet been completed therefore it is not yet possible to identify these linkages.
Note that whilst WCC took on a lead role in developing the Worcestershire GI Strategy, it has been produced through consultation and with the endorsement of the whole Worcestershire	Noted. <b>ACTION – ensure it is clear that the Worcestershire GI Strategy</b>

GI Partnership, and so the statement that WGIS is being produced by WCC should be amended to reflect this.	<b>has been produced by the Worcestershire GI Partnership</b>
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## KEY ISSUE: GI Requirements

<b>Sub Issues</b>	<b>Officer response</b>
The policy could be more specific about the quantity of GI required on new development sites. The national guidance supports a general rule of 40% of the total land of any development site to be reserved for GI. WCC encourages this approach to be followed within the county. There are already examples of strategic development sites in Worcestershire which are likely to include a large quantum of GI.	It is not considered appropriate to apply a blanket percentage for GI and there is no evidence supplied to suggest this would be appropriate in Redditch. Officers consider that different sites will require different approaches dependent upon the characteristics.
The GI policy could include a reference to the management and future maintenance of green infrastructure. GI needs to be well managed to ensure that its quality is maintained and networks are well functioning. Evidence suggests that good quality and accessible green infrastructure provide more benefits to the environment, economy and communities.	Agree that reference to maintenance of GI is appropriate.  <b>ACTION – insert the word ‘maintain’ into the 2<sup>nd</sup> paragraph of the policy and reference to maintenance and management in the RJ.</b>

## KEY ISSUE: GI Concept Statements

<b>Sub Issues</b>	<b>Officer response</b>
The policy states that "the Borough Council will, where appropriate, produce Green Infrastructure Concept Statements to guide masterplanning and development of Strategic Sites" which is welcomed. But this needs more qualification on where Concept Statements will be applicable, as "where appropriate" may not be specific enough. Additionally, whilst this paragraph addresses strategic development sites, it would be valuable to know what is suggested for GI on smaller sites.	The individual strategic site policies commit to producing concept statements for the strategic sites; therefore the words ‘where appropriate’ can be removed. GI provision on smaller sites will be guided by the GI strategy for the Borough.  <b>ACTION - Remove ‘where appropriate’ in relation to concept statements.</b>

## KEY ISSUE: Woodland and Hedgerows

Sub Issues	Officer response
New developments should enhance hedgerows and habitats, rather than threaten them. Green infrastructure should be sufficient that communities are able to notice an increase in species, rather than the continued decline.	The plan does not make reference to developments threatening hedgerows and habitats. In fact policy 16 requires the retention of existing trees, woodlands and hedgerows.

KEY ISSUE: Links to other policies

Sub Issues	Officer response
Regarding water: welcome the linkages identified in Policy 15 Climate Change and the linkages identified Policies 17 Flood Risk and 18 Sustainable Water Management. However, we would welcome inclusion of the same linkages within the reasoned justification for Policy 11 Green Infrastructure, as this would help to further strengthen and support the role of GI in flood risk management and in improving water quality.	The RJ already includes reference to flood protection and policies 17 and 18. Reference to improving water quality can also be included.  <b>ACTION – include reference to the role of GI in improving water quality.</b>
In the 'Reasoned Justification' section: add that the policy should be read in conjunction with 'Policy 13 Primarily Open Space'. The 'Reasoned Justification' for Policy 13 states that 'All Primarily Open Space is a valuable part of the Green Infrastructure Network of the Borough.	Agreed; this is an appropriate reference to make.  <b>ACTION – make reference to Policy 13 in RJ.</b>

KEY ISSUE: Link between GI and Economy

Sub Issues	Officer response
The link between economy and GI does not seem to be clearly addressed in either policy or reasoned justification. There is evidence that green infrastructure can support economic growth by, for example, increasing property prices and attracting inward investment to the area. Furthermore, GI supports the economy through the provision of products and services such as biofuels, contributing to	The link between the economy and GI can be explored in the forthcoming GI strategy for the Borough. The context of this relationship in Redditch is not currently known therefore it is not appropriate to include at this stage.

renewable energy. It also allows the use of natural resources, including through horticultural practices, and supports technological innovation to enable business growth, creation of new employment and skills development.	
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## KEY ISSUE: GI Strategy

<b>Sub Issues</b>	<b>Officer response</b>
To inform the proposed GI Strategy, we recommend the use of the county wide historic landscape characterisation and the completed Historic Environment Assessment. The County Council GI Sub Regional Framework incorporates the historic environment this providing a strategic framework to build in local detail and opportunities especially with respect to the preparation of concept plans for the identified strategic sites.	Noted.

**Policy 12 – Open Space Provision**

## KEY ISSUE: Open Space SPD reference

<b>Sub Issues</b>	<b>Officer response</b>
It is unreasonable for policy to defer what should be a local plan policy requirement to SPD or to "... any other form of planning obligation the Council adopts." (NPPF paragraph 153).	The Open Space SPD is already in existence and is considered to meet the requirements of the NPPF.
Insofar as this SPD is concerned, it is somewhat out of date having been produced to provide more detailed guidance on the Borough of Redditch Local Plan No.3 Policy. It has not been through independent examination.	The SPD not considered out of date because the calculations are still relevant. The ward standards may change through updates to the Open Space Needs Assessment but this would not affect the calculations.
If the Local Plan is to rely on CIL to enable its implementation, then the CIL documents should be consulted upon alongside the Local Plan.	The Local Plan does not state that CIL will be relied on to enable its implementation. The Council has not yet made a decision regarding whether or not to pursue CIL.



KEY ISSUE: Support for policy

Sub Issues	Officer response
Appears to be based on a sound evidence base, generally legally compliant and sound and in accordance with the National Planning Policy Framework so far as Natural England is qualified to comment.	Noted

KEY ISSUE: Open Space/Pitch requirements

Sub Issues	Officer response
<p>Once an evidence base meeting the requirements of Par 73 of the NPPF has been assembled, it is vital that relevant policies react to this evidence base and are positively worded in order to deliver required outcomes. In the same way that housing land polices and employment land polices reference the findings of the evidence base underpinning them and then respond to it, a policy on playing fields &amp; outdoor sport should set out what the issues are in Redditch and how planning policy is to respond to these challenges. It is not felt that the current wording of “maintaining minimum standards” within the general Open Space Policy (policy 12) does this and we consider that this can be improved. We acknowledge that Local Plan polices are overarching but we feel the polices and supporting text can be more locally specific and provide the context for more detailed policy within other DPD’s or SPD’s. Referencing identified issues (such as lack of pitches or the poor quality of some of the pitch stock for example) will enable the policies on protection of provision and those related to requirements for provision within new developments to be more positive, locally specific and robust.</p>	<p>The Open Space Needs Assessment (last carried out in 2009) is currently being updated and will include more of a qualitative assessment of amenity open spaces. Once completed, this may result in changes to the policy wording.</p> <p>In relation to playing pitches the policy can include references to recommendations of the Playing Pitch Strategy (2011 – 2016).</p> <p><b>ACTION – make reference to Playing Pitch Strategy recommendations in RJ.</b></p>

### Policy 13 – Primarily Open Space

KEY ISSUE: Policy wording

Sub Issues	Officer response
Amend bullet point iii to read: 'the merits of retaining the land in its existing open use to provide green spaces that give the wider urban area of the Borough a unique rural atmosphere, character and appearance and, the contribution or potential contribution the site makes to the Green Infrastructure Network of the area;'	It is not considered necessary to repeat wording from the vision within the policy.
Amend wording of final paragraph to read: 'Proposals for development of Primarily Open Space land will be required to demonstrate that the development positively contributes to both the Green Infrastructure Network in the Borough and the nature and purpose of the open space...'	Officers agree that reference to GI in this context is appropriate.  <b>ACTION – amend final paragraph as suggested.</b>
The wording of Policy 13 needs to be strengthened to comply with Policy 11 to ensure that the existing GI Network will be safeguarded and to recognise the importance of green open spaces that 'are a unique feature for Redditch as a former New Town' (Ref: page 17 Draft Plan) and the natural environment and open spaces that 'are a unique feature of Redditch which give the urban area a rural atmosphere' (Ref: page 17 Draft Plan).	It is not clear how the wording should be strengthened. The policy already makes reference to the GI network and states that the total or partial loss of will not normally be allowed.

KEY ISSUE: Support for policy

Sub Issues	Officer response
Appears to be based on a sound evidence base, generally legally compliant and sound and in accordance with the National Planning Policy Framework so far as Natural England is qualified to comment.	Noted
English Heritage welcome the reference in (ii) to taking into account the historic interest of a site.	Noted

#### Policy 14 – Protection of Incidental Open Space

KEY ISSUE: Support for Policy

<b>Sub Issues</b>	<b>Officer response</b>
Appears to be based on a sound evidence base, generally legally compliant and sound and in accordance with the National Planning Policy Framework so far as Natural England is qualified to comment.	Noted

### Policy 15 – Climate Change

KEY ISSUE: Support for policy

<b>Sub Issues</b>	<b>Officer response</b>
Welcome this policy and support bullet point vii in particular.	Noted
Support reference to the waste hierarchy in Policy 15, vi and the supporting text on p.44;	Noted
We welcome the emphasis given to flood risk management and 'blue infrastructure'	Noted

KEY ISSUE: Viability of requirements

<b>Sub Issues</b>	<b>Officer response</b>
Clause iii and iv are confusing. Clause iii requires compliance with the governments zero carbon targets whilst iv requires cfsh standards. Cfsh is not mandatory. Iv proposes local standards to be implemented ahead of national policy contrary to para 95 of the NPPF.	Zero carbon targets and the Code For Sustainable Homes (CFSH) are different. The CFSH is primarily being implemented through building regulations. The policy is not seeking implementation ahead of national standards; however this will be made clear in the RJ.  <b>ACTION – State that the policy is not seeking to require higher standards than are currently or will be required by national policy in RJ 3<sup>rd</sup> paragraph.</b>
RJ is contrary to NPPF – It is for the local authority to viability test the financial burdens of policy requirements	Plan viability work will be carried out based on national requirements and their associated costs.

House-builders are deterred by costly restrictions to build homes to the higher level of CFSH. However, the associated costs of low-carbon builds are lessening all of time	Noted
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KEY ISSUE: Further provisions in the policy

<b>Sub Issues</b>	<b>Officer response</b>
Mitigate long-term high carbon nature of building new developments, ensure UK meets Climate Change Act targets and lessen challenges facing the most vulnerable in society, like fuel poverty	The policy requires developments to meet national construction standards (i.e. Code for Sustainable Homes and BREEAM) in order to contribute to meeting the Climate Change Act targets.
Would like to see new developments be as low-carbon as possible	Agreed. The policy seeks to achieve this in line with national policy.
Ensure that the appropriate renewable technology happens within Redditch. Community renewables initiatives could provide this.	The policy encourages small scale renewable energy technology and other renewable energy technologies may be included within developments as part of meeting the requirements of the Code for Sustainable Homes and BREEAM. Officers are not aware of any community renewable initiatives that requires policy support but the policy would not preclude these from happening.
All new developments to require green roofs.	There is no evidence to justify requiring green roofs on all new developments. However, the policy would not preclude green roofs being included in new development.
All public buildings and refurbishments of public buildings to use the Passivhaus standard for energy efficiency. The Passivhaus standard should also be a requirement for all new private-sector developments.	The Borough Council does not have the evidence to justify build standards beyond those required nationally. However the policy would not preclude developments being built to Passivhaus standard.
New developments should include at least 20 per cent on-site renewable energy generation	The Borough Council does not have the evidence to justify requiring a percentage of renewable energy generation on site and therefore cannot include this requirement in the policy.
There is a need to discuss the advantages/disadvantages of Anaerobic Digestion (AD) and community composting for existing and new development within Redditch.	It is not appropriate to use the Local Plan as a discussion forum for such technologies or initiatives.
There should be a clear sense of what the Council's role should be in terms of negotiating Combined Heat and Power (CHP) links between	It is not considered necessary to define this in the Local Plan.

sites.	
Align roofs to take advantage of solar hot water and power	Criterion ii of the policy already states “the energy efficiency of the development must be maximised through its siting and orientation...”
The supporting text refers to the retrofitting of the existing housing stock. This could include historic buildings as well as those of more recent construction. For buildings of traditional construction it will be important to ensure that any measures are appropriate and do not diminish the significance of the building. For historic buildings English Heritage has prepared a range of guidance notes.	This paragraph has been removed from the RJ because the policy no longer refers to retrofitting.
The policy makes a broad reference to small-scale renewable technologies in appropriate locations. Is there a need to expand on this to address any particular issues associated with different technologies e.g. wind energy?	It is not considered necessary to include this detail as they are likely to vary on a site by site basis.

## KEY ISSUE: Woodland and hedgerows

<p>Would like to see a specific reference to the great benefits for both climate change mitigation and adaptation that trees and woodland can deliver.</p> <p>Would like to see Policy 15 sub-paragraph vii include additional wording (upper case amendments): <i>‘adaptation measures must be maximised, with particular emphasis on the provision of Green Infrastructure (see Policy 11 for further detail) AND THE POSITIVE USE OF TREES AND WOOD PRODUCTS’.</i></p>	<p>It is not considered appropriate to make specific mention to trees without reference to other GI features. It is however recommended that the wording is amended to ‘adaptation measures must be maximised, with particular emphasis on the provision, <i>enhancement and retention</i> of Green Infrastructure.</p> <p><b>ACTION – Insert the words ‘enhancement and retention’ into criterion vii.</b></p>
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**Policy 16 – Natural Environment**

## KEY ISSUE: Support for policy

<b>Sub Issues</b>	<b>Officer response</b>
Support for the retention of tree planting to act as natural barriers	Noted

between incompatible land uses	
Support the principles laid out in this policy and in particular the references to protection and enhancement of biodiversity.	Noted
Appears to be based on a sound evidence base, generally legally compliant and sound and in accordance with the National Planning Policy Framework so far as Natural England is qualified to comment.	Noted
Protecting the value of the natural environment is supported	Noted

## KEY ISSUE: Designated sites

<b>Sub Issues</b>	<b>Officer response</b>
It may be helpful to make specific mention of the hierarchy of protected sites (in line with guidance in the NPPF) and species and habitats of principle importance as referred to in section 41 of the Natural Environment and Rural Communities Act 2006. Whilst these are included in the reasoned justification for the policy we consider that explicit policy coverage would be helpful and may provide clarity and strength to the policy.	Agreed; specific mention of the hierarchy of protected sites is appropriate within the policy.  <b>ACTION – include reference to SSSI, LWS (formerly known as SWS) and LNRs</b>
Recommend that the document is amended to reflect the fact that the Local Wildlife Sites are not selected solely by the Wildlife Trust but by the Worcestershire Local Sites Partnership, which comprises LPAs, NE, EA, FC, WWT and others. Furthermore the term SWS has now been replaced with LWS (Local Wildlife Site) and it may be helpful to amend the document to reflect this change.	Noted  <b>ACTION – Replace SWS with LWS. Amend RJ to reflect the fact that the Local Wildlife Sites are not selected solely by the Wildlife Trust but by the Worcestershire Local Sites Partnership.</b>

## KEY ISSUE: Onerous criteria

<b>Sub Issues</b>	<b>Officer response</b>
Criteria iv and v are onerous and unachievable for some developments. Suggest the substitution of the word “expected” in the first paragraph of the policy with the words “developers will be encouraged”, and replacement criteria as follows:	Officers consider the word ‘expected’ should be retained but the suggested amendments to the bullet points are appropriate.  <b>ACTION – amend the two criteria as suggested.</b>

<p>“iv. avoid any significant adverse impact on skylines and hill features, including established views of those features; v. where possible retain existing trees (including Ancient Trees), woodlands and hedgerows:”</p>	
<p>Policy creates conflict with the proposed allocation and development of the A435 ADR and adjoining land. Part v of the draft policy seeks to retain existing trees without qualification. Seeks retention where an important contribution to interests of acknowledged importance, such as ecological biodiversity or habitat, or importance to landscape character are made.</p>	<p>Noted. The criterion will be amended as per the comment above.</p>

## KEY ISSUE: Ancient Woodland

<b>Sub Issues</b>	<b>Officer response</b>
<p>Pleased to see the reference to ancient trees and woodland in Policy 16/Section A/sub-paragraph V, but believe this could be even better worded in order to <u>protect</u> the irreplaceable habitat of ancient woodland.</p> <p>Amend Policy 16/Section A/sub-paragraph V to read (upper case amendments): <i>‘retain existing trees (including Ancient Trees), woodlands (INCLUDING ANCIENT WOODLANDS) and hedgerows (including important hedgerows) and semi-natural habitats with appropriate management. Particular emphasis should be placed on the expanding and linking of ancient semi-natural woodlands’.</i></p>	<p>Agreed; suggested reference to ancient woodlands is appropriate.</p> <p><b>ACTION – insert reference to ancient woodlands in criterion v and RJ.</b></p>
<p>Would like to see wider support for native woodland creation in general. As well as protecting and expanding ancient semi natural woodland and ancient trees, we would like to see (a) expansion around ALL ancient woodland sites, including Plantations on Ancient Woodland sites (PAWS). And also (b) expansion of native woodland generally for all the benefits it can bring.</p>	<p>Agreed; the suggested additional text is appropriate.</p> <p><b>ACTION – amend criterion v as suggested.</b></p>

<p>Amend Policy 16/Section A/sub-paragraph V further to read (upper case amendments): <i>'retain existing trees (including Ancient Trees), woodlands (INCLUDING ANCIENT WOODLANDS) and hedgerows (including important hedgerows) and semi-natural habitats with appropriate management. Particular emphasis should be placed on the expanding and linking of ancient [semi-natural DELETE] woodlands, AND THE CREATION OF TARGETED NEW NATIVE WOODLAND FOR WIDER BENEFITS'</i></p>	
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KEY ISSUE: Landscape

<b>Sub Issues</b>	<b>Officer response</b>
<p>Positively connect our landscape with new development. Use woodlands in social forestry projects to provide materials for hedgerow maintenance, timber-frame buildings.</p>	<p>This policy would not preclude this from happening. Policy 15 Climate Change criterion vi. requires proposals demonstrate that the use of sustainable, locally sourced and recycled materials has been considered.</p>
<p>Under point (iii) we consider the reference to the Borough's 'distinctive natural landscape' is amended to 'landscape' in its broadest context to better reflect the EU Landscape Convention and the natural and cultural dimensions of landscape character. Amend point (iii) to '..distinctive landscape..'.  This also provides the basis for the supporting evidence base to include the county wide Historic Landscape Characterisation as well as the Worcestershire Landscape Character Assessment. Both should be cross-referenced in the text.</p>	<p>Agreed; the word 'natural' will be deleted.  <b>ACTION – delete 'natural' from criterion iii.</b>  The Worcestershire Landscape Character Assessment is already referenced in the RJ. The Historic Landscape Characterisation can also be included.  <b>ACTION – Include reference to the Historic Landscape Characterisation in the RJ.</b></p>

**Policy 17 – Flood Risk**



## KEY ISSUE: The role of woodland

Sub Issues	Officer response
<p>Would like to see this policy 17 include a reference to the role that the natural environment – especially woods and trees – can play in delivering positive water quality and water flow outcomes.</p> <p>Include an additional sub-paragraph iv stating – ‘<i>use the natural environment including woods and trees to deliver sustainable water issue solutions</i>’.</p>	<p>It is not considered appropriate to just make specific reference to woods and trees. A reference to natural environment features within criterion iii is however considered appropriate.</p> <p><b>ACTION – make reference to natural environment features in criterion iii.</b></p>

## KEY ISSUE: SUDS requirements

Sub Issues	Officer response
<p>To alleviate the risk of flooding it is necessary to ‘green’ as many hard surfaces as possible using permeable surfaces.</p>	<p>Noted.</p>

## KEY ISSUE: Emerging Local Flood Risk Management Strategy

Sub Issues	Officer response
<p>As LLFA for Worcestershire, the County Council needs to ‘develop, maintain, apply and monitor’ a Local Flood Risk Management Strategy (LFRMS). Would welcome the inclusion of references to the emerging LFRMS to be included within the Flood Risk Management policies.</p>	<p>Noted; reference to the LFRMS will be included.</p> <p><b>ACTION – insert reference to the LFRMS in the RJ.</b></p>

## KEY ISSUE: SUDS Approval Body (SAB)

Sub Issues	Officer response
<p>The County Council will work with partners including the North Worcestershire Drainage Partnership to establish the SAB. Given the</p>	<p>Noted; reference to the SAB will be made.</p>

likely role of the SAB in enabling development and managing flood risk we would welcome reference within Policy 17 & 18.	<b>ACTION – include reference to the role of the SAB in RJ.</b>
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KEY ISSUE: Terminology

<b>Sub Issues</b>	<b>Officer response</b>
When referring to flood risk we would welcome the use of the term 'flood risk management'.	Agreed; the name of the policy will be changed to 'Flood Risk Management'  <b>ACTION – amend policy name to Flood Risk Management</b>

### Policy 18 – Sustainable Water Management

KEY ISSUE: Policy wording

<b>Sub Issues</b>	<b>Officer response</b>
Confusing with regards to SUDS, grey water recycling and rainwater harvesting. Consider the use of the words applied, encouraged, required and expected, which have different dictionary meanings and re-word for clarity	The separate reference to grey water recycling and rainwater harvesting is unnecessary and will be deleted.  <b>ACTION – delete sentence regarding grey water recycling and rainwater harvesting</b>

KEY ISSUE: SUDS requirements

<b>Sub Issues</b>	<b>Officer response</b>
New developments should build Swales that attenuate storm water and provide Waterscapes, using rainwater wherever possible	Swales are one of a number of SUDS techniques that can be utilised in relation to new developments. The appropriate SUDS technique will be determined on a site by site basis.
Council to enable local installers to improve their skills in the retrofitting of rainwater harvesting/grey-water recycling and other environmental technologies on existing buildings	This is not something that can be achieved through this Local Plan policy. The Plan does include a policy on Supporting Education, Training and Skills but this is not specific to any particular skill set.
Council should ensure that tough standards are set to ensure water-	All developments will be constructed to the current building regulations

saving measures on water fixtures and fittings within its buildings and in new private developments.	standards and other national requirements (such as Code for Sustainable Homes and BREEAM). The Council does not have the evidence to justify any other standards.
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KEY ISSUE: Reference to Waste Core Strategy

Sub Issues	Officer response
Support Policy 18 but would recommend that the supporting text on page 50 "This policy should also be read in conjunction with..." be expanded to include "the Worcestershire Waste Core Strategy, particularly policies WCS 3 and WCS 6";	Agreed; reference to the Waste Core Strategy should be included.  <b>ACTION – include reference to Waste Core Strategy as suggested in RJ.</b>

KEY ISSUE: SUDS Approval Body (SAB)

Sub Issues	Officer response
The County Council will work with partners including the North Worcestershire Drainage Partnership to establish the SAB. Given the likely role of the SAB in enabling development and managing flood risk we would welcome reference within Policy 17 & 18.	Noted; reference to the SAB will be made.  <b>ACTION – include reference to the role of the SAB in RJ.</b>

KEY ISSUE: Support for policy

Sub Issues	Officer response
Given the recent experiences of drought and flooding in Worcestershire and identified issues of water stress, we welcome the inclusion of policies to promote water capture and recycling as part of an integrated approach to water management.	Noted
We welcome the inclusion of policies to promote the improvement and protection of water quality.	Noted

**Policy 19 – Sustainable Travel and Accessibility**

## KEY ISSUE: Cycling

Sub Issues	Officer response
There is no provision in Redditch Town Centre for safe and secure cycle parking when on average a cycle costs in excess of £400.	The provision of secure cycle parking is being provided through the 'Choose How you Move' Scheme currently being implemented in Redditch. In addition cycle parking must be provided alongside new development as part of Worcestershire County Councils Parking Standards.
Existing and new developments should embed a 'Filtered permeability' to encourage cycling and walking. Contributions to cycling infrastructure (separated cycle lanes or cyclist priority roads) and more secure cycle storage are to be required	<p>This Policy seeks to ensure developments are designed to encourage cycling and walking. 'Filtered Permeability' refers to Cycle routes that are on street, Criteria iii of this Policy states that new developments should prioritise cycleways which run adjacent to footpaths. The type of cycle routes that should be provided by new developments will be negotiated with Worcestershire County Council on a site by site basis.</p> <p>With regards to contributions to cycling infrastructure, the Infrastructure required to deliver development will be identified in the Infrastructure Delivery Plan, this will inform developer contributions required in relation to development sites.</p>

## KEY ISSUE: Primary Route Network

Sub Issues	Officer response
Primary Route Network should also include the link towards the M42 junction 2. Connection to Abbey Stadium should be a priority and gives a second option to link from Redditch with the M42/that side of Birmingham closest to the new Birmingham Hospital	The Primary Route Network is an already established network and cannot be changed through planning policy.

## KEY ISSUE: Move to sustainable modes away from the car

Sub Issues	Officer response
Plan for less car use, to design-out our over dependence on the car,	The Policies within this Local Plan seek to reduce car use and

and movement.	promote more sustainable modes of travel.
Car club spaces to be installed on or near major developments, and all residents in urban areas to be within a few minutes' walk of car club spaces, thereby obviating the need for private cars for all except the disabled	There is no mechanism for the Local Plan to deliver car club schemes as they need to be managed and maintained; therefore it is not possible to include this requirement within the Policy. However, planning policy does not preclude car clubs from occurring.
1960s designed ring road and the main residential thoroughfares off them have become increasingly congested over the last 10 years. In addition concern over the impact of high density housing being proposed through the Local Plan on congestion.	It is accepted that car usage has increased over time which leads to additional traffic on the roads; however the roads in Redditch are not congested to a high level on a daily basis.  Concern over the impact of further housing is noted, however the Borough Council have completed transport assessments which considers the impact of the predicated volume of traffic over the plan period on the roads and the recommended mitigation measures necessary.
The Public transport system within Redditch has deteriorated, there are fewer services operating less frequently and finishing too early. In addition services do not run on Sundays and Bank Holidays (particularly in Oakenshaw or Crabbs Cross).	It is accepted there have been cuts to public transport; however this is outside of the remit of the planning system. The Local Plan can only encourage improvement to the system on the back of new development.
Many people in Redditch do not have a viable choice of transport other than to use cars to be able to meet commitments.	It is accepted that the private car provides the most flexible choice of transport, however it is an aspiration of this Policy that residents use more sustainable modes of transport when they are able to.

## KEY ISSUE: Safe and sustainable routes

<b>Sub Issues</b>	<b>Officer response</b>
<p>The following points should be included into Policy 19:</p> <p><b>a. Impact of development on existing routes</b></p> <p>It is recommended that development layouts should seek to increase natural surveillance of <u>established routes</u>, as well as new. Where established routes are linked to crime or anti-social behaviour and</p>	<p>It is considered that the importance of natural surveillance is covered by Policy 40 High Quality and Safe Design Criteria vi. With regard to the second sentence it is not possible to require developers to deliver</p>

<p>suffer from poor design, developers may be required to apply to have these diverted or extinguished.</p> <p><b>b. Need to balance permeability and activity</b></p> <p>It is recommended that developments should apply the principles stated in SPD Designing for Community Safety to achieve an appropriate balance between permeability and activity. Excessive permeability will dilute activity, increase escape routes for criminals and compromise defensible space.</p> <p><b>c. Features of safe and sustainable routes</b></p> <p>It is recommended that new routes should be direct and convenient, well-overlooked and well maintained. Sharp bends, blind spots and secluded accesses should be avoided.</p>	<p>or remove infrastructure to correct existing problems therefore it is not possible to incorporate this request into this policy.</p> <p>Reference to the Designing for Community Safety SPD is already included within the Reasoned Justification of the Policy.</p> <p>Agreed this detail will be included within the Policy.</p> <p><b>ACTION – Amend Criteria iii to “Proposals should incorporate appropriate, safe, convenient, <u>well-overlooked and well maintained</u> pedestrian and cycle access...”</b></p>
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**Policy 20 – Transport Requirements for New Development**

KEY ISSUE: Onerous criteria

<b>Sub Issues</b>	<b>Officer response</b>
<p>Requirement in criterion iv for all proposals to be located within 250 m of local services and a public transport link may not be achievable for all developments. Suggests the following rewording of the criterion: “iv. all proposals should strive to ensure that they are located within 250m of local services ... etc.”</p>	<p>The majority of the urban area of Redditch, where development would be sustainable is able to achieve this standard. It is considered that proximity to a bus stop makes public transport available to people and therefore is important in the achievement of these policy objectives.</p>

KEY ISSUE: Reference to Waste Core Strategy

Sub Issues	Officer response
Insert "This policy should also be read in conjunction with the Worcestershire Waste Core Strategy, particularly policy WCS 17"	If relevant the Worcestershire Waste Core Strategy will be used as a material consideration by Officers when determining planning applications. It is not considered further reference to this document is necessary in this Policy.

KEY ISSUE: Criteria iii)

Sub Issues	Officer response
<p>Include in Criteria iii)</p> <p style="text-align: center;"><b>a. Features of safe and sustainable routes</b></p> <p>It is recommended that new routes should be direct and convenient, well-overlooked and well maintained. Sharp bends, blind spots and secluded accesses should be avoided.</p>	<p>This recommendation has been incorporated within Policy 19 and therefore it would not be necessary to repeat it here.</p>
<p>Could the following wording is inserted into Criteria iii: -</p> <p><i>"All proposals should incorporate safe and convenient access arrangements in their design for all potential users (including pedestrians, cyclists, <b>emergency services and</b> waste collection vehicles). Access arrangements should be designed to reflect the function and character of the development and its wider surroundings. <b>They should also discourage unintended through traffic ("rat runs") within the development site and/or between sites."</b></i></p>	<p>Agreed, the first amendment will be included within the Criteria iii. With regard to the last sentence this will be incorporated as a new criterion.</p> <p><b><i>ACTION – Amend Criteria iii to ““All proposals should incorporate safe and convenient access arrangements in their design for all potential users (including pedestrians, cyclists, <u>emergency services and</u> waste collection vehicles).”</i></b></p> <p><b><i>Action – Incorporate new criteria “<u>All proposals should discourage unintended through traffic (“rat runs”) within the development site and/or between sites;</u>”</i></b></p>

Policy 21 – Alexandra Hospital Public Interchange

No Comments received.



## Creating a Borough where Businesses can Thrive

### Policy 22 – Employment Land Provision

KEY ISSUE: Support - Cross boundary reference in policy

<b>Sub Issues</b>	<b>Officer response</b>
Welcomes the acknowledgement that cross-boundary provision is required to make up the employment requirement.	Support noted
The identification of land to meet the employment needs of Redditch borough is supported.	Support noted
The policy includes provision within Stratford-on-Avon district to meet Redditch needs and this is supported	Support noted

KEY ISSUE: Question Policy

<b>Sub Issues</b>	<b>Officer response</b>
Amount of job creation suggested is questioned and challenged.	<p>The employment target has been derived following the DCLG methodology for Employment Land Reviews (2004), with particular reference to Stage 2: Creating a picture of future requirements. This forecast has drawn on data produced in the Strategic Housing Market Assessment, relating to the Borough's population growth up to 2030 and the demographics associated with this growth.</p> <p>Whilst it is acknowledged that the current economic climate is not particularly strong, it should be recognised that as the Plan period extends to 2030, it is expected that both 'peaks' and 'troughs' in the economic climate will occur during this period.</p>

KEY ISSUE: Site specific concerns

<b>Sub Issues</b>	<b>Officer response</b>
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<p>Policy states that 12ha of the overall requirement for 55ha will be located in Stratford. Appendix 3 indicates that Winyates Triangle (HCA plot 1) will contribute just 4.5ha. The site is 12.6ha gross and is expected to provide 7.2ha net developable area (drawing UD15 of Savills/HCA rep). There is no benefit to be had from withholding any part of the Winyates Triangle Site, and if viable development is to be achieved, it will be necessary to maximise the development yield from the site in order to fund the necessary infrastructure to open up the site. Assuming all other sites remain as drafted, amend policy 22 to state that 15ha of land will be provided within Stratford District.</p>	<p>The estimated capacity of the Winyates Green Triangle has taken account of the Phase 1 Habitats and Protected Species Survey (Jan 2011), which suggests that for this site, it is unlikely that a large-scale development could be adequately incorporated without a significant loss and/or affect to the semi-natural habitats. A smaller development, if adequately located on poorer grassland, whilst minimising damage to, and retaining where possible woodland, hedgerows, ponds and stream habitat, would have a significantly lower impact.</p> <p>If a net developable area of more than 4.5ha can be achieved, officers would not wish to compromise comprehensive development of this site.</p> <p><b>ACTION: Alter policy wording to say 'a minimum of' 12 hectares will be accommodated within SOAD</b></p>
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KEY ISSUE: Empty premises

<b>Sub Issues</b>	<b>Officer response</b>
<p>Although there is apparently land available for business development in Redditch, there aren't the businesses and many built sites lie empty, encouraging commuting to Birmingham</p>	<p>There are currently only 6 acres of commercial land readily available and being marketed in the Borough. Last year (1/6/12 to 31/5/13) RBC's Economic Development Unit received 39 enquiries from businesses looking for land which represents a demand for more than 50,000 acres of land.</p>
<p>There is anecdotal evidence of a large number of industrial units in Redditch that have been continuously empty for many years.</p>	<p>The amount of empty office and industrial space in Redditch is relatively low (office, 15% and industrial, 8%), which represents a reasonable amount needed for market churn and therefore this is not an issue in Redditch.</p>

KEY ISSUE: Review of employment sites

<b>Sub Issues</b>	<b>Officer response</b>
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<p>Redditch does not appear to have carried out an adequate review of its industrial land. Could result in the release of a number of redundant industrial sites to be recycled for housing or mixed use development.</p>	<p>The Employment Land Review (ELR) was originally undertaken in 2008/09 when a full review of the Borough's employment land was undertaken with Economic Development Unit colleagues. The annual review of the ELR reassesses employment sites for their suitability. The 2012 ELR update identified 4 sites which would be more appropriate for alternative uses.</p> <p>Whilst officers are aware of the intended purposes of NPPF para 22, it is important to remember that RBC also has an obligation to identify land to meet its employment target. Given the make-up of Redditch's New Town design, primarily employment areas may not provide the most suitable locations for residential development without compromising the existing business uses. However, any applications for alternative uses within employment areas will be considered on their individual merit and where it has been demonstrated that there is no reasonable prospect of the site being used for its intended purposes.</p>
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KEY ISSUE: More provision of smaller sites

<b>Sub Issues</b>	<b>Officer response</b>
<p>The Local Plan should make provision for smaller, flexible employment sites where these can help to diversify the economy and lead to the development of indigenous businesses, in particular self-employed people and start-ups</p>	<p>The sites identified in the ELR and BORLP4 range from 0.19ha to 10ha, any of which are available for development to meet the various needs of different types and sizes of business.</p> <p>The allocated employment sites are likely to be developed either by either large single occupiers or property developers, due to the expertise required and the high cost of developing. What the property developers build will generally be dictated by the market, i.e they will build what there is demand for.</p> <p>Redditch has a relatively healthy supply of incubator space (e.g.</p>

	Greenlands Business Centre, Rubicon Business Centre, Heming Road Enterprise Centre, the Business Centre, the Imex Centre). None of these are fully occupied. There is also an extensive stock of smaller units, in fact the largest proportion of units are 5,000 sq ft or less.
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KEY ISSUE: Support

Sub Issues	Officer response
WCC Minerals and Waste Officers support the policy and supporting text.	Support noted

KEY ISSUE: Eastern Gateway Game changer site

Sub Issues	Officer response
<p>Make reference to the importance of the Redditch Gateway 'Game Changer' site. Although the three constituent parts of the 'gateway' fall within Bromsgrove and Stratford-on-Avon districts, many of the benefits of the site's delivery will be felt within Redditch Borough.</p> <p>The vision for Redditch Eastern Gateway is to provide a significant enhancement to the employment land supply in Worcestershire through the creation of a high-profile and accessible employment scheme to help to position Redditch to take advantage of the demand of the M40/M42 corridor and fulfil the following vision:</p> <ul style="list-style-type: none"> <li>- The development of all three areas of land to create a high-quality office and industrial "gateway" to Redditch, making the most of the sites' excellent access to the motorway network and capitalising on Worcestershire's high-quality environment and labour force;</li> <li>- Take full advantage of the scale of the sites by looking beyond typical manufacturing uses, and enabling additional employment opportunities through the development of high-</li> </ul>	<p>Agreed.</p> <p><b>ACTION – Include reference to Redditch Eastern Gateway in Policy 22 Employment Land Provision (first paragraph), and for clarity that the waste management facilities are to be found within Redditch and not on the Redditch Eastern Gateway</b></p>

<p>quality office/HQ-style stock which Redditch cannot currently accommodate; and</p> <ul style="list-style-type: none"> <li>- Take a coordinated and masterplanned approach to the sites, delivering a new primary access for all three areas to increase their prominence, and provide a gateway to Redditch's wider opportunities.</li> </ul> <p>Supporting this vision is the assumption that the public sector will work with the existing landowners and their delivery partners to support delivery of the following:</p> <ul style="list-style-type: none"> <li>- A comprehensive (albeit phased) approach to the development of all three elements of the Redditch Eastern Gateway (c.29 Ha).</li> <li>- Establishment of a masterplan for the scheme providing for high quality employment uses in an attractive landscaped setting.</li> <li>- A strategy to deliver a new highways access into the Redditch Eastern Gateway – potentially by way of a new roundabout on the A4023.</li> <li>- Marketing of the site as a high quality business park to support both existing businesses and to provide the opportunity to diversify the employment base of the town through attracting businesses who are not currently provided for within the existing supply of sites.</li> </ul>	
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**Policy 23 – Development within Primarily Employment Areas**

KEY ISSUE: Existing employment designations

<b>Sub Issues</b>	<b>Officer response</b>
As currently worded, it is unclear whether the policy is intended to apply to all sites within Primarily Employment Areas, or simply	The policy applies to all areas identified as 'Primarily Employment' on the accompanying policies map.

<p>existing employment sites within these areas. We assume the former given your officers' past interpretation of a similar policy in the adopted Local Plan No.3.</p> <p>Notwithstanding this, the superstore at Alvechurch Highway is clearly not in employment use as defined in the supporting text for the purposes of this policy. Given that the site is an established foodstore, we request that the boundary of the Primarily Employment Areas is redrawn to exclude the Redditch superstore site, and the adjacent petrol filling station and retail warehouse units. To simply carry over an old designation is not appropriate and serves no purpose.</p>	<p>The question of whether the superstore should be within a designated Primarily Employment Area was raised through the Local Plan No.3 consultation and examination process. At that time Officers noted that the site forms part of a larger defined Primarily Employment Area. It is well related to adjacent employment uses and has the potential to successfully accommodate a range of employment uses should the existing store close. It was recognised that the designation does not reflect the existing use but Officers recommended that the site remains as part of the larger defined Primarily Employment Area. This view was corroborated by the Inspector.</p> <p>Officers do not consider that this situation has changed therefore the designation should remain.</p>
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KEY ISSUE: Support for policy

<b>Sub Issues</b>	<b>Officer response</b>
WCC Minerals and Waste Officers support the policy.	Noted

#### **Policy 24 – Development outside of Primarily Employment Areas**

No representations received

#### **Policy 25 – Office Development**

KEY ISSUE: Location of office development

<b>Sub Issues</b>	<b>Officer response</b>
The policy states that provision is made for 14,500 sqm of office development, encourages office in the town centre, but also encourages office development at strategic sites 46 Brockhill and 47	Redditch has limited land availability within the Town Centre to meet all Town Centre uses. The Retail and Office Needs Assessment (2012) (RONA), identified that there was a 26% office vacancy rate

<p>Alexandra Hospital. Both of these strategic sites are out-of-centre and out-of-town.</p> <p>The NPPF states (para 23) that office use is a town centre use. Paragraph 24 requires LPA's to apply a sequential test to the location of town centre uses (including offices) unless in accordance with an up to date development plan strategy. There is no explanation that a sequential approach has been adopted concluding that the town centre cannot accommodate all of the office requirement and that strategic sites 46 and 47 are the most suitable locations for office development outside the town centre.</p>	<p>within the Town Centre, with the majority of vacant stock being 'unfit for purpose' i.e. 21<sup>st</sup> century business practices. The Assessment also cited poor onsite parking provision as a deterrent to businesses locating in the Town Centre.</p> <p>Whilst RBC acknowledges the benefits of Town Centre located office development, it also has to recognise the distinct lack of take-up of Town Centre premises, including those that have recently been refurbished to high-end standards. Furthermore, Redditch has a unique New Town development pattern, which provides Primarily Employment Areas (PEAs) specifically for business uses (including offices). To ensure that the Borough can offer a range of sites, buildings and business locations across the Borough, it is imperative that office development is not stifled and considered favourably beyond the Town Centre in PEAs. Strategic Sites 46 &amp; 47 both contain sites previously identified to meet employment needs (IN67 &amp; IN69), however, office development would also be appropriate in other PEA locations.</p> <p><b>ACTION: Amend policy to refer to PEAs as suitable locations for office development.</b></p>
<p>Should have ability to direct office development to locations other than the town centre, but there is no evidence to suggest that sites 46 and 47 are the only or the most suitable locations</p>	<p>Noted.</p> <p><b>ACTION: Amend policy to refer to PEAs as suitable locations for office development.</b></p>
<p>The potential for office development at Winyates Triangle should therefore also be considered</p>	<p>Noted and agreed. See responses and actions at Policy 22 – Employment Land Provision</p>
<p>A criteria based policy may provide a more effective mechanism to allow office development to come forward out-of-centre in appropriate locations.</p>	<p>Noted.</p> <p><b>ACTION: Amend policy to refer to PEAs as suitable locations for office development.</b></p>

## KEY ISSUE: Provision of office development

Sub Issues	Officer response
<p>Cannot see how the assessment sets that there is need to increase office space in Redditch, many offices that have not been able to rent, there have recently been change of use of purpose built office space to another fast food takeaway.</p>	<p>The amount of empty office (15%) in Redditch represents a reasonable amount needed for market churn and therefore this is not an issue in Redditch.</p> <p>The Retail and Office Needs Assessment (2012), which only focussed on the Town Centre, concluded that the majority of existing office development was 'unfit for purpose' i.e. 21<sup>st</sup> century business practices. This presumption can probably be applied equally to some of the existing vacant office stock elsewhere in the Borough.</p> <p>The additional office floorspace requirement has been derived through the ELR and its projections in employment growth up to 2030 across various employment sectors.</p>

**Policy 26 – Rural Economic Development**

## KEY ISSUE: Sustainable use of buildings

Sub Issues	Officer response
<p>Consider all possible uses of buildings to secure the most appropriate sustainable option</p>	<p>This goes against the aim of the policy, however the policy allows for an element of residential development where there is justification.</p>

## KEY ISSUE: Historic Farmsteads

Sub Issues	Officer response
<p>Encourage use of evidence and planning tools in relation to historic farmsteads and landscapes</p>	<p>Agreed.</p> <p><b>ACTION: Include reference to the Worcestershire Farmsteads Guidance</b></p>



An element of new build may be appropriate due to sensitivities of a farmstead and its landscape setting	Agreed.  <b>ACTION: Include text “In some circumstances an element of new build may be appropriate” and reference in reasoned justification</b>
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### Policy 27 – Supporting Education, Training and Skills

KEY ISSUE: Unjustified policy

<b>Sub Issues</b>	<b>Officer response</b>
It is difficult to see how the requirement on developers to educate or train local residents in essential employability skills is justified in terms of CIL regulation 122, or indeed implementable in development management terms.	Officers acknowledge that there may be a lack of precision in the policy as currently drafted. Further work is required to evidence and justify the policy requirements. The policy will be redrafted, if necessary, following this.
Delete policy as the requirement fails in terms of CIL Regulation 122 in not being: a. necessary to make to any development acceptable in planning terms; b. directly related to the development; and c. unable to be fairly and reasonably related to the scale and kind to the development.	
The policy does not set a specific level of contribution that will be sought and is therefore ambiguous	
Fundamentally, the development would need to be unacceptable in planning terms without the obligation proposed	
Delivery of housing or employment is not dependent upon the skill level of local people. Needs exist in any event.	
If additional costs are loaded onto development it will result in the market going elsewhere and the development may be lost to other locations outside Redditch borough.	
Lack of precision in the policy further demonstrates that there is no direct linkage between major development (which itself is not	

defined) and the obligation being sought	
The policy includes an offer of negotiation if the imposed obligation is unviable, it does not go far enough, and should state that the obligation (if appropriate and lawful) would be agreed at a level to ensure the financial viability of the development in accordance with appropriate guidance, such as that produced by the RICS.	

### Policy 28 – Broadband and Telecommunications

KEY ISSUE: Support for the Policy

Sub Issues	Officer response
Pleased that the damaging effects of some installations on the heritage assets is recognised.	Noted.

KEY ISSUE: Consistency with NPPF/over restrictive criteria

Sub Issues	Officer response
Support for the policy with the exception of criteria (i). This is contrary to NPPF para 46 (LPAs should not seek to question the need for the telecommunications system). This criteria should be removed as it is overly restrictive	<b>ACTION – Amend criteria i. to take out the requirement to demonstrate “a need for development in that particular location”</b>

KEY ISSUE: Siting of technology

Sub Issues	Officer response
Consider the siting of technology and impact on the structure/building technology might be attached to.	Agreed.  <b>ACTION – Amend criteria iv. to: “the development has been sympathetically designed, sited, landscaped and camouflaged to minimise its visual impact on the building/structure, the character and appearance of the</b>

	surrounding area and impact on residential amenity.”
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### Policy 27 – Supporting Education, Training and Skills

KEY ISSUE: Unjustified policy

Sub Issues	Officer response
It is difficult to see how the requirement on developers to educate or train local residents in essential employability skills is justified in terms of CIL regulation 122, or indeed implementable in development management terms.	Officers acknowledge that there may be a lack of precision in the policy as currently drafted. Further work is required to evidence and justify the policy requirements. The policy will be redrafted, if necessary, following this.
Delete policy as the requirement fails in terms of CIL Regulation 122 in not being: a. necessary to make to any development acceptable in planning terms; b. directly related to the development; and c. unable to be fairly and reasonably related to the scale and kind to the development.	
The policy does not set a specific level of contribution that will be sought and is therefore ambiguous	
Fundamentally, the development would need to be unacceptable in planning terms without the obligation proposed	
Delivery of housing or employment is not dependent upon the skill level of local people. Needs exist in any event.	
If additional costs are loaded onto development it will result in the market going elsewhere and the development may be lost to other locations outside Redditch borough.	
Lack of precision in the policy further demonstrates that there is no direct linkage between major development (which itself is not defined) and the obligation being sought	
The policy includes an offer of negotiation if the imposed obligation is unviable, it does not go far enough, and should state that the	

obligation (if appropriate and lawful) would be agreed at a level to ensure the financial viability of the development in accordance with appropriate guidance, such as that produced by the RICS.	
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## Improving the vitality and viability of Redditch Town Centre and District Centres

### Policy 29 – Town Centre and Retail Hierarchy

KEY ISSUE: Extent of Town Centre

Sub Issues	Officer response
Note inclusion of Peripheral Zone in the Town Centre boundary. The rationale is not clear	This was carried forward from a previous version of the plan and consultation. Responses were widely in favour of the extension of the peripheral zone in order to regenerate, encourage city centre renaissance and increase residential accommodation –
The peripheral zone areas would be town centre and have the same status as the rest of the town centre. By doing this this area no longer becomes the second choice for town centre uses. To delete the peripheral zone would remove the need to consider alternative sites in the Town Centre first, diluting the Town Centre An alternative approach would be to expand the retail core	With or without the peripheral zone the extent of the town centre and primary shopping areas would still be defined, based on a clear definition of primary (retail core) and secondary frontages and make clear which uses will be permitted in such locations –

KEY ISSUE: New retail and retail supply

Sub Issues	Officer response
Supply of available retail sites is outstripping the demand for new floorspace. To increase demand in the town centre would exacerbate the problem.	The delivery of comparison and convenience retail floorspace over the plan period is evidenced in the Council's Retail Needs Assessment. It may be that at present the supply of retail sites is outstripping the demand for new floor space however the plan covers a significant period of time therefore needs to be flexible and adapt to change which includes variations in the economic climate.
In any significant new area of housing development, provision should be made for local retail outlets which encourage vibrant and diverse	Definition of 'significant'? In policy terms the significant sites would be the strategic sites that are included in the plan. The policies for the

neighbourhood/district retail centres	sites have made provision for local retail outlets.
Of existing retail and planned retail space in the area, at least 30% of all retail floor space is to be allocated for occupation by independent and SMEs	From a planning and economic development perspective independent and SME's would be encouraged into retail floor space however this couldn't be allocated space as it would not be able to be enforced. In addition the change in the new permitted development regulations would have an impact on this.

## KEY ISSUE: Evening/night-time economy

<b>Sub Issues</b>	<b>Officer response</b>
There should be a specific detailed policy and supporting guidance in the Local Plan	<p>The policy already makes reference to promoting a vibrant and safe, high quality, evening economy. Presently Redditch Town centre has limited site availability to accommodate a new evening and night time economy however potentially allocating sites is something to be looked at through a forthcoming allocation DPD. Officers consider that the Redditch retail policy reflects all relevant aspects of the NPPF and West Mercia will also be consulted as part of the planning process for comments.</p> <p><b>ACTION: amend Policy 30 to include the following as a priority project;</b></p> <p><b>Enhancing the evening and night time economy</b></p> <p><b>iii. include safe and well designed buildings and places, incorporate any relevant guidance contained within Supplementary Planning Documents, for example 'Designing for Community Safety' and 'Encouraging Good Design'</b></p> <p><b>Amend policies reasoned justification to state;</b></p>

	<p>in order to meet the requirements of this policy, proposals should incorporate the guidance presented within the Supplementary Planning Documents such as 'Designing for Community Safety' and 'Encouraging Good Design'. Early consultation between developers and the council is encouraged to ensure effective consideration of community safety issues during the design of the development.</p>
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### Policy 30 – Regeneration for the Town Centre

KEY ISSUE: Historic Environment

<b>Sub Issues</b>	<b>Officer response</b>
<p>Use the findings of the Historic Environment Assessment to help inform the masterplanning of strategic sites and green infrastructure planning.</p>	<p>Agree with comments, include links in regeneration policy to link back to Historic Environments Policies; <b>see revised policy.</b></p> <p><b>ACTION: amend policy to include following bullet point;</b>  iv. <b>Supporting heritage-led regeneration in the Town Centre that enhances the existing historic environment through high quality development that is sensitive to its context;</b></p> <p><b>Amend policies reasoned justification to state;</b>  <b>The Church Green Conservation Area located within the Town Centre is centered around St Stephen's Church and includes a wide range of buildings that date from the late eighteenth</b></p>

	<p>century. Whilst the conservation of the historic qualities of the built and natural environment are the principle objectives of the Conservation Area designation, the opportunity for new development to enhance and contribute towards the life and character of these areas is welcomed by the Borough Council where this accords with the special architectural and historic interest. The Historic Environment Assessment (HEA) for Redditch highlighted the loss of many historic buildings in the Borough, particularly during the construction of the New Town. The Town Centre saw many changes around this time with the construction of the Kingfisher Shopping Centre and ring road, but there are new opportunities to support and enhance the character and appearance of the Town Centre through heritage-led regeneration</p>
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### Policy 31 – Protection of the Retail Core

KEY ISSUE: Extent of the retail core

<b>Sub Issues</b>	<b>Officer response</b>
<p>Expand the retail core and not the deletion of the peripheral zone (Plan attached to representation from Barton Wilmore obo capital &amp; regional). This will attract demand for additional floorspace instead of restricting where retail floorspace can go</p>	<p>The purpose of the retail core is to protect existing uses not specifically to attract demand.</p>
<p>It is not appropriate to exclude part of the Kingfisher shopping centre from the retail core to address the issue of non-A1 uses being given permission, as the preferred location for a group of non-A1 uses may change over the plan period.</p>	<p>The purpose of the policy is to protect primary retail frontage. The area in the policy excluded is that of the first floor level over the bus station which doesn't have any primary retail frontage. There is flexibility in the policy as detailed below to include non A1 uses over the plan period where they contribute to the vitality and viability of the centre.</p>

KEY ISSUE: Continuous frontage of retail units



Sub Issues	Officer response
<p>The requirement that changes to non A1 uses do not result in a continuous frontage of more than two non retail units isn't reasonable or acceptable.</p> <p>Places like food courts are typical grouped not dispersed and the policy would prevent co-location</p> <p>The approach of Policy 31 is at odd with permission granted 2013/073</p>	<p>The Policy does contain flexibility for proposals for Non A1 uses that may or may not be grouped and result in a continuous frontage. This will be assessed on the proposals contribution to the vitality and viability of the area.</p>

KEY ISSUE: Definition of 'first floor'

Sub Issues	Officer response
<p>Since the bus station creates a split level it is unclear what is meant by the first floor, needs clarity for future decisions</p>	<p>Agreed this can be clarified</p> <p><b>ACTION: Amend policies reasoned justification to state, "The top floor level of the Kingfisher Shopping Centre currently accommodating the cinema is to be excluded from the retail core."</b></p>

### Policy 32 – Use of Upper Floors

KEY ISSUE: Support for the Policy

Sub Issues	Officer response
<p>English Heritage supports this policy and the support it can provide in keeping a historic building maintained and in active use</p>	<p>Noted</p>

### Policy 33 – New Town District Centre Redevelopment

## KEY ISSUE: Community Safety

Sub Issues	Officer response
<p>Look at wider/general community safety comments that could be related to district centres and integrate them into this section. Can the policy take account of the district centre specific guidance offered in the Designing for Community Safety SPD. Also can the SPD be mentioned in the policy.</p>	<p>Agree</p> <p><b>ACTION: Amend policy to include the</b></p> <p><b>v. propose a scheme that takes opportunities to design out crime and make the District Centre feel safer incorporating ;any relevant guidance contained within Supplementary Planning Documents, for example ‘Designing for Community Safety’ and ‘Encouraging Good Design’.</b></p>

**Policy 34 – Health of District Centres**

No representations received

### Protecting and Enhancing Redditch's Historic Environment

KEY ISSUE: Terminology (applies to all policies in section)

Sub Issues	Officer response
The terminology of the policies should reflect the NPPF	Agreed - policy wording can be updated to reflect NPPF  <b>ACTION – change ‘preserve’ to ‘conserve’</b>

KEY ISSUE: Local distinctiveness (applies to all policies in section)

Sub Issues	Officer response
Identify locally distinctive elements of the Boroughs heritage resource in <u>all</u> policies and supporting reasoned justification	The policies in this section have had significant amendments to identify locally distinctive elements and address local challenges and opportunities.

### Policy 35 – Historic Environment

KEY ISSUE: Evidence

Sub Issues	Officer response
Refer to other local evidence such as Historic Landscape Characterisation, Historic Farmstead and Landscape Project and Historic Environment Record as well as the Historic Environment Assessment	These are covered in the RJ (HLC and HER)

KEY ISSUE: Contradiction in wording

Sub Issues	Officer response
<p>The policy has is a commitment to no loss of a heritage asset which is followed by a sentence referring to the loss of an asset. Review/clarification is needed in the context of the NPPF's stance on this.</p>	<p>Agree - policy wording can be updated.</p> <p><b>ACTION – Amend wording to:</b>  <b>“Proposals that will lead to substantial harm to or loss of significant heritage assets will not be permitted. Where there is to be a loss of a heritage asset <u>that has been agreed</u>, developers are required to record, archive and make information about the asset publicly accessible.”</b></p>

NOTE: In light of discussions with English Heritage and the changes made to the policies - suggest the merging of Policy 36 Listed Buildings and Structures and Policy 38 Locally Listed Heritage Assets to form a new policy - **Historic Buildings and Structures**.

## Creating Safe and Attractive Places to Live and Work

### Policy 39 – Built Environment

KEY ISSUE: Support for Policy

Sub Issues	Officer response
Welcomes general approach and content of policy and text in particular the references to the historic environment.	Noted.

KEY ISSUE: Links with biodiversity

Sub Issues	Officer response
Support the intent of this policy and consider that the built environment has much to offer in terms of biodiversity enhancement. With that in mind we would recommend that you strengthen bullet ii or iii to make clear that opportunities to add features such as bat roosts, biodiverse green roofs and bird boxes should be taken wherever possible in line with guidance in the NPPF (see for example paras. 9 and 109).	<p>Support noted.</p> <p>The policy requires development to incorporate features of the natural environment and refers to Policy 16 Natural Environment, which covers this in adequate detail.</p> <p>A reference to climate change will be added to the Policy.</p> <p><b>ACTION: Amend criteria ii. to:</b>  <b>“be innovative and resilient to the effects of climate change, whilst also protecting.....”</b></p> <p><b>Reasoned Justification:</b>  <b>“New developments in the Borough should be constructed in an efficient and sustainable manner in order to be climate resilient and contribute to reducing carbon emissions. Applications will be judged against the criteria set out in Policy 15 Climate</b></p>

	<b>Change.”</b>
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KEY ISSUE: Historic Context

<b>Sub Issues</b>	<b>Officer response</b>
It might be better to refer to the ‘historic context’ in the opening paragraph	It is unclear what is meant by this, or what more context could be added here.

KEY ISSUE: Repetition

<b>Sub Issues</b>	<b>Officer response</b>
There is some element of repetition in the text	Noted. Suspect this was down to a formatting error.  <b>ACTION: Delete repeated text on page 88</b>

### **Policy 40 – High Quality and Safe Design**

KEY ISSUE: Support for the policy

<b>Sub Issues</b>	<b>Officer response</b>
We welcome and support Policy 40 and its requirement that all development should encourage community safety and ‘design out’ vulnerability to crime, by incorporating the principles and concepts of the ‘Secured by Design’ award scheme.	Noted.

KEY ISSUE: Design

<b>Sub Issues</b>	<b>Officer response</b>
If Redditch wishes to be seen as a forward thinking and diverse town for the future then I believe enough is enough of the same old design homes. The term ‘in keeping’ doesn’t have to mean ‘same old’	Policy 39 Built Environment encourages innovative design

Allow different developers with different designs and ideas to develop the next phases of Redditch. You only have to look at Redrow's New Heritage Collection planned for Bromsgrove (Aston Fields) and Alcester or the St Modwen design homes at Longbridge. Quite a difference in style, design and very innovative.	Policy 39 Built Environment encourages innovative design
Build in a variety of styles, avoiding rows of the same 'little boxes'.	Policy 39 Built Environment encourages innovative design

KEY ISSUE: Viability of requirements

<b>Sub Issues</b>	<b>Officer response</b>
Mandatory imposition of secured by design award scheme which is a voluntary best practice guide is inappropriate under para 95 of the NPPF	The 'Secured by Design' award scheme supports one of the Government's key planning objectives - the creation of secure, quality places where people wish to live and work. Secured by Design has also been cited as a key model in the Government publications including 'Safer Places - The Planning System & Crime Prevention' and in the Home Office's 'Crime Reduction Strategy 2008-11'.

KEY ISSUE: Sustainable design

<b>Sub Issues</b>	<b>Officer response</b>
The visual impact of new developments should be lessened through the use of Green Roofs, perhaps even earth-sheltering. We must aim for sustainable intentional neighbourhood design.	Too onerous for policy

KEY ISSUE: Fire safety measures

<b>Sub Issues</b>	<b>Officer response</b>
Include the following additional criterion on fire safety: "Proactively consider the incorporation of fire safety measures;"	This is covered in building regulations

<p>Reasoned Justification:  “Sustainable design should also proactively consider fire safety, such as through the incorporation of water suppression systems and/or water supplies for fire fighting for example.”</p>	
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## KEY ISSUE: Community Safety

<b>Sub Issues</b>	<b>Officer response</b>
<p>We note that Local Plan No. 3 contained a separate policy for crime prevention: Policy S1 “Designing Out Crime”.</p> <p><b>Dedicated policy for Community Safety</b></p> <p>To reflect the continued importance of this subject area, the need to avoid potential ambiguity over the meaning of the word “safe” and the Council’s statutory duty to consider crime and disorder implications in all of its functions, we recommend that a separate policy is preserved in Local Plan No. 4.</p> <p>For the sake of clarity and highlighting links to the retained SPG, this Policy could be named “Designing for Community Safety.” Alternative names might be “Safer Communities” or “Designing Out Crime.”</p>	<p>The policy in LP3 pre-dated the SPD. It is considered now we have the SPD we are in a stronger position and a reference to the SPD is more appropriate than repeating some of the content of the SPD.</p> <p>The only reference to ‘safe’ is within the name of the policy, which can be clarified by renaming the policy.</p> <p><b>ACTION: Rename the Policy - High Quality Design and Safer Communities</b></p>
<p><b>Importance of Design &amp; Access Statements to address Community safety issues</b></p> <p>We recommend that this Policy and/or the local validation checklist includes reference to the important role that of Design and Access Statements in issues of community is undertaken at the earliest stage of development when the scope for impact is at its widest. We would ask that guidance published by Secured By Design on Design</p>	<p><b>ACTION: Include the following wording in the reasoned justification: “Early consultation between developers and the council is encouraged to ensure effective consideration of community safety issues during the design of the development.”</b></p> <p><b>Secured by Design guidance on Design and Access Statements would best fit with the other guidance on design and access statements and climate change statements on the Making a</b></p>



<p>and Access Statements is promoted via the Local Plan and/or local validation checklist</p>	<p><b>Planning Application section of the Council’s website.</b></p> <p><b>ACTION: Liaise with Development Management about putting the Secured by Design guidance document on the Councils website</b></p>
<p><b>Community safety issues at site assembly stage</b></p> <p>We would ask that this Policy represents issues relating to the integration of the site with its surroundings, that can be best dealt with at site assembly stage. For example the need for Developers to avoid poorly defined spaces, particularly at the edge of the site. This may mean that it is desirable to add to or remove land from the site.</p>	<p><b>ACTION: Amend the introduction to include: “Good design improves the local environment, helps new development to fit in with its wider surroundings and creates a distinctive sense of place”</b></p>
<p><b>Public art</b></p> <p>We would ask that the provision relating to public art requires Developers to take specific account of the risk of crime and disorder (chiefly deliberate damage and theft) to artwork.</p> <p>We would ask that consideration is given to the contribution that public art can make to reducing crime and promoting community safety, for example through the Redditch RoadWay Arts programme.</p>	<p><b>ACTION: Amend the reasoned justification to include: “When correctly designed and sited, public art can also make a significant contribution to reducing crime and promoting community safety.”</b></p>
<p>Suggest a minor amendment to part (vi) of Policy 40, to more closely align it with the Secured by Design award scheme in terms of physical security standards.</p>	<p>Noted. Wording in criterion vi. can be amended to include this.</p> <p><b>ACTION: Delete relevant wording and replace with: “vi. encourage community safety and ‘design out’ vulnerability to crime by incorporating the principles, concepts and physical security standards of the ‘Secured by Design’ award scheme”</b></p>

<p><b>Secured by Design – overlap with HCA and CfSH guidelines</b></p> <p>We ask that the Policy encourages Developers of affordable housing to recognise the requirement to meet the Homes and Communities Agency’s (HCA) Design and Quality Standard. Developers should be advised of the overlap between this and the Code for Sustainable Homes (CfSH), which incorporates elements of the SBDaward. You may wish to cross reference this in Policy 15 Climate Change.</p> <p>We recommend that in the case of affordable housing developments, it will be the Policy of the Planning Authority to require certification of relevant SBD elements (as part of CfSH/HCA standards) as a condition of planning consent. Discussions with the Police Crime Risk Manager and Borough Council’s Housing Strategy Service indicate that there is currently a gap in monitoring and regulation of this area.</p>	<p>This isn’t a requirement and is too onerous for the policy.</p>
<p><b>Secured by Design – parity between market and affordable housing standards</b></p> <p>In this context, we recommend that the Policy requires Developers of sites comprising both affordable and market housing to construct both types to the same physical security standards, unless they can demonstrate that to do so would make the development unviable. This requirement is justified as it will avoid market housing being built to lower standards than affordable housing sharing the same site. Furthermore, there is good evidence that the costs of meeting this element of SBB are minimal (Davis Langdon, “Capital Costs of Secured by Design Accreditation”, 2010, p3, <a href="http://www.securedbydesign.com/professionals/pdfs/SBD-costs-">http://www.securedbydesign.com/professionals/pdfs/SBD-costs-</a></p>	<p>The policy encourages use of the principles and concepts of secured by design and doesn’t distinguish between market and affordable housing.</p>

<a href="#">2010-Davis-Langdon.pdf</a>	
<p><b>Secured by Design – promotion of certified developments</b></p> <p>Redditch Borough Council and North Worcestershire Community Safety Partnership will seek to publicise and promote developments that achieve SBD standards. We would ask that consideration is given to including a statement to this effect in the Policy.</p>	<p><b>ACTION: Include the following wording in the reasoned justification: “Redditch Borough Council and North Worcestershire Community Safety Partnership will publicise and promote developments that achieve Secured by Design standards.”</b></p>

#### **Policy 41 – Shopfronts and Shopfront Security**

KEY ISSUE: Support for the policy

<b>Sub Issues</b>	<b>Officer response</b>
We welcome and support Policy 41 and its approach to shopfront security and agree that shopfront security measures should not lead to the creation of a hostile environment.	Noted.

KEY ISSUE: Secured by Design/Designing for Community Safety

<b>Sub Issues</b>	<b>Officer response</b>
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<p>New guidance '<i>Secured by Design – Commercial Guidance</i>', is relevant to this policy (due to be released in Summer 2013). Policy 41 should include the principles and standards of 'Secured by Design' (as with Policy 40) to ensure its objectives are achieved.</p>	<p>Noted that this can be amended to include reference to Secured by Design</p> <p><b>ACTION: Delete relevant wording and replace with:</b>  <b>"...In considering proposals for the installation of shopfront security measures, the Borough Council will apply the principles and standards set out in the Borough's Designing for Community Safety Supplementary Planning Document and the 'Secured by Design' award scheme."</b></p>
<p>Suggest that the Policy makes reference to the desire to promote "active frontages" and increased natural surveillance.</p>	<p>An additional criterion can be added to the policy covering this</p> <p><b>ACTION: add new criterion iv. "that, ground floor uses have an active frontage; and"</b></p> <p><b>Include the following wording in the reasoned justification:</b>  <b>"Ground floor uses with active frontages (for example frequent doors and windows) provide opportunities for natural surveillance, increasing the sense of security and adding to the vitality of the public realm."</b></p>
<p>With a view to possible revisions to SPG "Designing for Community Safety" it may be beneficial for Planning officers to consider the role of decorative grilles and other security treatments which strike a balance between visual permeability, aesthetics and protection for glazing.</p>	<p>Too much detail for the policy in advance of any revision to the SPD</p>

KEY ISSUE: Repairing existing shopfronts

Sub Issues	Officer response
<p>Could the opportunity for repairing existing shopfronts be covered?</p>	<p>This is covered in criteria i. of the policy</p>

KEY ISSUE: Terminology/NPPF

Sub Issues	Officer response
The last paragraph of the policy should be updated in the context of the NPPF with regard to terminology and the significance of heritage assets	Agreed - policy wording can be updated to reflect NPPF  <b>ACTION – change policy wording from ‘preserve’ to ‘conserve’</b>

### Policy 42 – Advertisements

KEY ISSUE: Natural surveillance

Sub Issues	Officer response
We welcome the addition of Policy 42 in relation to the control of advertisements, but suggest the following minor amendment: “Care should be taken to ensure that the position of advertisements does not obscure security surveillance cameras, <b>significantly affect opportunities for natural surveillance</b> , obstruct the highway...”	Noted that this can be amended to include natural surveillance.  <b>ACTION: Delete and replace with:</b> “Care should be taken to ensure that the position of advertisements does not obscure security surveillance cameras, <b>significantly affect opportunities for natural surveillance</b> , obstruct the highway...”

KEY ISSUE: Landowner consent

Sub Issues	Officer response
The policy should require the applicant to demonstrate the consent of the landowner. This addition to the policy would encourage applicants to seek landowner consent prior to making an application.	<b>ACTION: The following text can be inserted into the reasoned justification:</b> “In Redditch there have been problems with advertisements being placed on Council and Highway land without permission. Consent from the landowner is required for any Advertisement, otherwise is likely that enforcement action will be taken.”

KEY ISSUE: Heritage Assets

<b>Sub Issues</b>	<b>Officer response</b>
Where the policy and reasoned justification covers heritage assets refer to the ‘...significance of the building...’	<b>ACTION: Amend policy wording to:</b> “In addition to these criteria, applications affecting historic buildings, their settings of for buildings located within a Conservation Area should consider the significance of the building, be of a traditional design and in style sympathetic to the building and its historic context.”

## Promoting Redditch's Community Well-being

### Policy 43 – Leisure, Tourism and Abbey Stadium

KEY ISSUE: Leisure/sports facility provision

Sub Issues	Officer response
There are no plans in place to increase leisure facilities to attract more people to the town	Leisure facilities will be provided based on an assessment of need to be determined through the Infrastructure Planning process.
Areas of new housing development should include community facilities like employment, training, health and leisure	The strategic site policies identify where new community facilities are required to support new development.
<p>The starting point for developing strong sport related planning policy is the evidence base and understanding local need as stated in NPPF para 73. In addition to the Playing Pitch Strategy, the Council also needs to understand the supply and demand for other relevant types of sporting provision e.g. swimming, sports hall sports and other local relevant activities. Aware that a sub-regional sports framework was undertaken in 2010 but we have some concerns that this does not provide an appropriate understanding of local needs as required by Par 73 of the NPPF and see this as an important matter to address.</p> <p>Built sports provision such as swimming pools and sports halls seem to be included within Policy 43. It is not clear what the needs are for this type of provision and what the evidence is for this as required by the NPPF. It is not felt the policy responds to what the issues are in Redditch for this type of important provision and this needs to be reconsidered.</p>	It is considered that an understanding of the sporting provision need can be achieved through the Infrastructure Planning process that is on-going. The policy may be amended, if necessary, once the final IDP has been assembled.

KEY ISSUE: Community Assets

Sub Issues	Officer response
Concerned that current community assets may be lost due to the	Community assets can be protected through the 'Community Right to

<p>current economic climate. Would like to see how current community assets can be protected from residential development and ensure there are enough leisure facilities to ensure that the town does not become overcrowded as a result of additional residential development</p>	<p>Bid' to buy community buildings and facilities. More generally, community assets are afforded some protection through the retail hierarchy policy. Assets may also not be built leisure facilities and could be (but not limited to) open spaces or playing pitches which are protected by policies in this plan.</p> <p>It is not considered reasonable to place long term protection to all leisure facilities including private facilities. The Plan does however safeguard land at the Abbey Stadium for leisure and leisure related uses.</p>
<p>Communities should be provided with facilities for health, leisure, employment and retail. There may be opportunities for shared community use, rather than private ownership. Eg. An affordable professional laundry service in a neighbourhood would lessen the need for expensive washing machines in individual houses.</p>	<p>It is not within the remit of the Local Plan to identify whether facilities are privately owned or in community ownership. The strategic site policies identify what new facilities are required to support new development.</p>

KEY ISSUE: Support for policy

<b>Sub Issues</b>	<b>Officer response</b>
<p>Welcome the comments regarding the need to protect and enhance the River Arrow in the reasoned justification for Part B. Abbey Stadium.</p>	<p>Noted</p>
<p>Welcome and support the positive reference in the policy and text to the contribution of the Borough's heritage assets in supporting leisure and tourism.</p>	<p>Noted</p>
<p>Investment in flood risk infrastructure and in enhancing the quality of the water environment can contribute to the local economy. We therefore welcome the recognition of the role of the water environment in supporting sustainable leisure, tourism and culture in Policy 43.</p>	<p>Noted</p>

KEY ISSUE: Reference to GI



Sub Issues	Officer response
<p>Insert new bullet point iii to read as follows: 'the proposal contributes positively to the Green Infrastructure Network'</p>	<p>Green Infrastructure is already referenced in the RJ to the policy in the context of the natural environment. It is considered that this could be strengthened by reference to GI in the second paragraph of the policy and cross-reference to Policy 11 Green Infrastructure.</p> <p><b>ACTION: insert reference to GI in second paragraph of policy and insert reference to Policy in 11 in RJ.</b></p>
<p>The RJ for Policy 11 Green Infrastructure states that Policy 11 should be read in conjunction with Policy 43 given the great importance of Green Infrastructure. The land at Abbey Stadium forms the Green Northern Gateway between the Green Belt and the Arrow Valley Country Park. It is therefore a very important part of the Borough's GI.</p> <p>Insert new wording in B Abbey Stadium to read as follows: 'Proposals for developments in the area designated as the Abbey Stadium will need to demonstrate that:</p> <ul style="list-style-type: none"> <li>i. the development will contribute positively to the Green Infrastructure Network, and</li> <li>ii. the development will safeguard and protect the semi-rural and greenfield character, atmosphere and appearance of existing open spaces in the area, and</li> <li>iii. appropriate sequential assessments and impact tests have been carried out in accordance with the National Planning Policy Framework to show that the uses should not be located in the Town Centre or other areas.</li> </ul>	<p>Noted</p> <p>This section of the policy is to safeguard land for leisure and leisure-related uses and not to guide future development, the proposed wording is therefore not appropriate for inclusion.</p>

#### Policy 44 – Health Facilities

KEY ISSUE: Flexibility in policy

Sub Issues	Officer response
General support for the policy but it is hoped that it would be interpreted with a degree of flexibility in respect of other peripheral land areas within the hospital curtilage in the light of the outcome of local healthcare planning discussions to establish service needs.	Noted. A more flexible approach to land use in the curtilage of the hospital can be considered, dependant on the outcome of the service review; reference to this can be included in the RJ to the policy.  <b>ACTION – include reference to the service review in the RJ</b>

KEY ISSUE: Health benefits of green infrastructure and woodland

Sub Issues	Officer response
<p>Would like to see a reference to the positive role that the natural environment – especially woods and trees – can deliver for both mental and physical health issues.</p> <p>Include a new sub-paragraph listing trees and woods as a key delivery option for health &amp; wellbeing - <i>promote trees and woods together with wider green infrastructure as a delivery mechanism for making significant improvements in health and wellbeing.</i></p>	Whilst the health and wellbeing benefits of trees and woodland are not disputed it is not considered appropriate to make the suggested amendment as this policy concerns Health Facilities. Both Policy 11 Green Infrastructure and Policy 43 Leisure, Tourism and Abbey Stadium already make reference to the health benefits that can be gained through green infrastructure and the natural environment and this is considered adequate for the Local Plan.

KEY ISSUE: Error

Sub Issues	Officer response
Change reference to the Rear of the Alexandra Hospital Strategic site from policy 48 to 47	Noted. This will be changed.

### Policy 45 – Cemeteries

No representations received

**Strategic Sites****Policy 46 – Brockhill East**

KEY ISSUE: Support for policy or the site

<b>Sub Issues</b>	<b>Officer response</b>
Support the principles outlined in sub-sections ix, xii and xviii.	Support noted.
Support inclusion of Brockhill East as a Strategic Site	Support noted.
Evidence base confirms from all appropriate sustainable development assessment criteria that it is the most suitable location because of proximity to the town centre, its use of an Area of Development Restraint, its containment by the topography, the potential for community building through relocation of the existing Holyoakes First School into the area, potential for high frequency bus services, and access to existing and planned employment.	Support noted.
Supports the acknowledgement that the exceptional circumstances needed to remove the site from the Green Belt have been demonstrated.	Support noted.
Weights Lane is a logical and strong Green Belt boundary to the north of the site.	Support noted.

KEY ISSUE: Housing requirements

<b>Sub Issues</b>	<b>Officer response</b>
RSS is still not yet abolished so the RSS housing requirements still hold weight	The WMRSS has now been abolished and therefore holds no weight in the planning process. Housing requirements should be based on evidence.

KEY ISSUE: Land east of the Railway being a separate allocation to land to the west

<b>Sub Issues</b>	<b>Officer response</b>
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Should be separate allocation from the west of the railway because it is in separate control and has resolution to grant planning permission	Although this is the case it is important to consider the whole site as one Strategic Site due to their close proximity and the necessary supporting infrastructure which would serve both areas.
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## KEY ISSUE: Open Space and community woodland designation

<b>Sub Issues</b>	<b>Officer response</b>
The Strategic Site should include the Primarily Open Space (POS) already designated as it forms part of the POS with the already under constructed phase 1 of the sites development. Not designating POS as part of strategic site is inconsistent with the rest of the Strategic Site which would include other areas of open space.	This open space can be included within the Strategic Site boundary however it would not form any part of any open space contribution necessary to support further development. Any proposed development would need to be provided with its own proportion of open space.
The policy makes no mention of the draft Primarily Open Space allocation on the site. Open space disposition on site should be determined at master-planning stage when public access can be addressed.	As above, this existing open space allocation can be included within the Strategic Site boundary however it would not form any part of any open space contribution necessary to support development. Any proposed development would need to be provided with its own proportion of open space.
Exclude community woodland from Strategic Site allocation, while it will be part of the masterplan area, it is outside the developable area.	Although the community woodland is outside of the Developers developable area there is no harm or detriment including it within the Strategic Site boundary. As per comments above this open space would not form any part of any open space contribution necessary to support development. Any proposed development would need to be provided with its own proportion of open space.
Object to the reference to the Green Infrastructure Concept Statement, a document that has not been published and is not available for comment. Either deleted references or the reasoned justification could signal the Council's intention to prepare it to guide development proposals.	Agreed the Reasoned Justification will be amended to reflect the intention to publish the Green Infrastructure Concept Statement.  <b><u>ACTION – Amend Reasoned Justification to read “A Green Infrastructure Concept Statement will be produced by Worcestershire County Council in conjunction with the Borough Council. Green Infrastructure must be provided based on the needs identified within this statement and must guide the provision of green infrastructure.”</u></b>

## KEY ISSUE: Employment within the site

Sub Issues	Officer response
Criterion ii: Unreasonable to expect that employment development is delivered concurrently with the other phased development. It would not be viable to build speculative premises, putting at risk delivery of housing. The Policy should require serviced employment land to be provided concurrently or in phases to match housing delivery and for the employment land to be actively marketed.	Agreed Criterion 11 will be amended to reflect the suggestion.  <b>ACTION – Amend Criterion ii to “<i>serviced employment land to be delivered concurrently in Phase Two to match housing delivery within the strategic site. Employment land must be actively marketed;</i>”</b>

## KEY ISSUE: Transport

Sub Issues	Officer response
If any development is to come forward at Brockhill East then Network Rail would recommend that a Transport Assessment will be necessary to take into account cumulative and wide ranging effects of development on transport infrastructure including new and improved access arrangements to the development site.	Agreed Criterion xv of this Policy requires a Transport Assessment to be provided.
Where growth areas or significant housing allocations are identified close to existing rail infrastructure the potential impacts of this need to be assessed. Many stations and routes are already operating close to capacity and a significant increase in patronage may create the need for upgrades to the existing infrastructure including improved signalling, passing loops, car parking, improved access arrangements or platform extensions. Network Rail would require adoption of the new bridge by the County Council. In addition, the grant of formal air rights over the railway would be necessary for any new bridge. The terms and conditions for such rights would need to be discussed further with Network Rail (Property).	Agreed Criterion xv of this Policy requires a Transport Assessment to be provided which considers wider impact of development.  Network Rail have been consulted as part of this consultation and the concurrent consultation on Redditch Housing Growth, therefore they are aware of the significant housing growth and potential allocations. Network Rail will be consulted again with regard to the housing growth and the potential infrastructure required to support this as part of the on-going work preparing the Infrastructure Delivery Plan.
If a new bridge over the railway (or the widening of an existing	Officers are not aware that a new bridge or widening of the existing

<p>bridge) is required in connection with the Brockhill East development then Network Rail would initially need to be consulted on the location and design of the bridge (or widening of existing bridge) to ensure it does not prejudice the railway and is “in principle” acceptable to Network Rail. Further discussion with Network Rail would be necessary in relation to the Agreement(s) required for any new bridge (or widening of an existing bridge) that is proposed to be constructed over the railway and future maintenance.</p> <p>If development comes forward on land to the west of the railway without a new bridge then Network Rail would have concerns. Any such development is likely to generate additional traffic under the railway at Hewell Road and particularly Windsor Road where there is a height restriction. This may result in an increased risk of vehicles hitting the railway bridge(s) and consequentially could lead to train delays.</p> <p>Hewell Road railway bridge has low headroom and there are records of a vehicle strike. The current highway signage on the approaches and on the structure needs to be up graded to meet the latest Traffic Signs Manual and should be mandatory. The bridge should be provided with black and yellow chevrons together with a “LOW BRIDGE” banner. Also provision of a Collision Protection Beam at this site would be desirable.</p>	<p>bridge is required to support the Brockhill development. If Network Rail feels this infrastructure is needed to support the safe operation of the railway then this information needs to be available to the Borough Council and the developers of the site, however it has not been mentioned previously. The Borough Council will be contacting Network Rail again to determine what infrastructure is needed to support the Plan through the preparation of the Infrastructure Delivery Plan.</p>
<p>Windsor Road railway bridge; there is only one footpath on the North side; there does not appear to be any low bridge signage on the approaches nor on the bridge. Information shows height to be 16’- 8”.</p>	<p>If Network Rail feels this infrastructure is needed to support the safe operation of the railway then this information needs to be available to the Borough Council and the developers of the site. The Borough Council will be contacting Network Rail again to determine what infrastructure is needed to support the Plan through the preparation of the Infrastructure Delivery Plan.</p>
<p>Network Rail is proposing to undertake works to double the line between Alvechurch and Redditch. As access via Weights Lane is a</p>	<p>Network Rail have been consulted as part of this consultation and the concurrent consultation on Redditch Housing Growth, therefore they</p>

<p>vital part of the construction for the project, therefore Network Rail will have a need for this area for access requirements for the works etc. The council should ensure Network Rail are contacted and informed of developments, so that any proposals do not impact our ability to gain access to the railway to undertake this work.</p>	<p>are aware of the potential development on site.</p> <p>It is felt that Network Rail should be in regular contact with the Developers of the site to ensure access and works can be undertaken. Contact details of the developer/ agents of the site have been provided to Network Rail to enable this communication.</p>
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## KEY ISSUE: Environmental concerns

<b>Sub Issues</b>	<b>Officer response</b>
<p>Opposed to any further development on any Brockhill sites due to the sensitivity of the environment.</p>	<p>Environmental Assessments have been conducted by the Developers of the site. This information has informed masterplanning of the site and will also be considered further during the Planning Application process.</p>
<p>The reduction of good quality agricultural land and the loss amenity value to the residents is a concern.</p>	<p>Whilst this is appreciated and understood the need for housing at this time outweighs other considerations. This site has been determined to be a suitable and sustainable housing site.</p>
<p>Developers have added no community value with the development of the Pointers Way and it has not been developed in way that is sympathetic with the topography of the local area.</p>	<p>This Policy seeks to ensure future development is of a high quality and is sympathetic with the surrounding topography.</p>
<p>WYG report indicate that Bordesley was a much better alternative than Brockhill</p>	<p>The WYG Evidence was largely discredited by the Inspector of the WMRSS Examination. Evidence suggests that Brockhill is a sustainable location for housing development.</p> <p>In addition Bordesley is not within the Borough boundary, it is essential to ensure the most efficient use of land is achieved within the Borough. The Brockhill East site is a suitable and sustainable site within the Borough which can accommodate development.</p>
<p>Development at Brockhill East will have a serious detrimental impact on the GI contained within the areas of the River Arrow close to Weights Lane and the Abbey Stadium. River Arrow is a Special Wildlife Site (SWS). It is essential that appropriate measures are</p>	<p>Environmental Assessments have been conducted by the Developers of the site. This information has informed masterplanning of the site and will also be considered further during the Planning Application process. Mitigation measures may be necessary and these will be</p>

taken to protect and enhance the River Arrow and to ensure that the ecological value of the wildlife corridor within the Abbey Stadium area is not undermined, especially on the down slopes of the hill to Weights Lane and the A441.	discussed during the preparation of a planning application. This Policy requires (Criterion xii) appropriate mitigation measures to be implemented to ensure protection of the natural environment.
It is essential that the developer contributes positively to the provision or enhancement of Green Infrastructure in the surrounding areas.	Agreed. This Policy requests that Green infrastructure is provided (Criterion xii).
Amend point vii to read as follows, <i>'the whole Strategic Site must be designed to successfully integrate with the existing Brockhill area, to protect the environment, appearance and character of the surrounding Green Belt and Green Infrastructure...'</i>	Amending this point to the suggested wording would alter the purpose of the Criterion.  Criterion ix refers to the need for Green Infrastructure to be provided. Criterion xii refers to protecting the natural environment.  The Strategic Site will not be surrounded by Green Belt as the adjacent land is considered to be suitable to meet Redditch's housing requirements across the Borough boundary.
Amend point xi to read as follows: <i>'landscaping should be reflective of the Wooded Estate land landscape type, with sensitive landscape treatment being applied along the site boundaries with, in particular, the Green Belt and Green Infrastructure'</i>	Criterion ix refers to Green Infrastructure.  The Strategic Site will not be surrounded by Green Belt as the adjacent land is considered to be suitable to meet Redditch's housing requirements across the Borough boundary.

## KEY ISSUE: Historic Environment

<b>Sub Issues</b>	<b>Officer response</b>
Use the findings of the Historic Environment Assessment to help inform the masterplanning of strategic sites and green infrastructure planning.	This site falls within Historic Environment Character Zone (HECZ) 148 of the Historic Environment Assessment (HEA) which has been identified as having high potential for archaeology; therefore an appraisal of the site will be required prior to any development. The Policy will be amended which requires applicants to complete an archaeological appraisal to an appropriate level prior to development



	<p>in accordance with Policy 35 Historic Environment.</p> <p><b><u>ACTION – Amend Policy to include criterion which says “The Historic Environment Record should be consulted during the formulation of development proposals to establish the potential for heritage assets and used to inform any necessary appraisal or evaluation of the site;”</u></b></p> <p><b><u>ACTION – Amend Reasoned Justification to include the following, “This site falls within Historic Environment Character Zone (HECZ) 148 of the Historic Environment Assessment (HEA) which has been identified as having high potential for unknown archaeology; therefore an appraisal of the site will be required prior to any development. Please see Policy 35 Historic Environment for more information.”</u></b></p>
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KEY ISSUE: Minerals

<b>Sub Issues</b>	<b>Officer response</b>
<p>There is a small area of mineral resource around Lowans Hill. The deposit is not so significant that the council would require a full minerals safeguarding assessment; earlier working at the site has removed most of its significance, but the deposit formerly exposed 8.5m of variable lithology, including gravelly and pebbly sand, boulder clay, silt and clayey sand and sand with clayey seams. You may wish to consider if it is possible to use some of this material as a borrow pit. WCC Officers will be pleased to advise on the mineral planning issues and need for any specific mineral planning permission.</p>	<p>Officers will work with WCC Officers and Developers to ensure all materials are appropriately utilised.</p>

KEY ISSUE: Emergency Services Infrastructure/developer contributions

<b>Sub Issues</b>	<b>Officer response</b>
Developer contributions, will be required from new development in order to develop a new police facility in Redditch	Infrastructure required to deliver development will be identified in the Infrastructure Delivery Plan, this will inform developer contributions required in relation to development sites.

**Policy 48 – Webheath**

KEY ISSUE: Biodiversity

<b>Sub Issues</b>	<b>Officer response</b>
Flooding would affect otter habitats	The Environment Agency would be consulted on any Planning Application that is received by the Council. If there is deemed to be an impact upon otter habitats then mitigation measures would be required.
<p>Habitats for flora and fauna will be destroyed which would be damaging to rare breeds i.e. Natterer and Pipistrelle Bats, Great Crested Newts, Birds (including Owls, Kestrels, Kingfishers, Pheasants Great Spotted and Green Woodpecker and Skylarks), Badgers, Fox's, Trout, Otters, Butterflies, Moths, rare amphibians and Orchids. It would not be possible to move them to a new home.</p> <p>Need to protect habitats for wildlife (listed above). In particular, EU Directive (Annexe IV) 92/43/EEC on conservation of natural habitats and of wild flora and fauna. Evidence has been submitted that these species are in or on the proposed development site.</p> <p>There are 21 species of birds in one garden in Great Hockings Lane which will be lost when fields, hedgerows and trees are destroyed.</p> <p>Recent ecology surveys and the records at Worcestershire Biological Records Centre show the area to support a number of European protected species. These include Great Crested Newts, Wood peckers, nesting Buzzards, Sparrowhawks, Owls, Kestrels, Pheasants, Partridge, Redwings, Starlings, Swallows and House Sparrows. Just downstream of this area it has now been confirmed there is at least one Otter foraging and nesting.</p>	<p>Before development commences and a planning application is approved a habitats survey and protected species survey will be completed to the appropriate standards, in accordance with relevant legislation. This will inform the masterplanning of the site in order to mitigate the effects of development on biodiversity and maximise opportunities for biodiversity and recreation.</p> <p>The policy requires that Green Infrastructure is provided alongside planting and landscaping which would enhance the ecological and woodland features of the site. In order to achieve this, a hedgerow assessment, determining which hedgerows are worthy of retention and protection should be prepared. This will be included in the Policy.</p> <p><b>ACTION – Amend Policy to read “vii. Planting and landscaping must be incorporated <u>(informed by a hedgerow assessment)</u>, to enhance....”</b></p>

<p>Pumphouse Lane is a haven for wildlife and has the largest population of Great Crested Newts in the area.</p> <p>[Evidence submitted by E Morris containing a database of wildlife found near or on Webheath ADR – Email saved in BORLP4 Supporting Evidence]</p>	
<p>Environmental concerns for flora and fauna within the catchment of the Bow Brook and associated watercourses. The Bow has been identified by the Environment Agency as failing to meet 'good ecological status' (Water Framework Directive), which must be addressed.</p> <p>Attention drawn to Bow Brook Biodiversity Delivery Area statement by Worcestershire Biodiversity Partnership (saved at BORLP4 reps file)</p>	<p>It is not for new development to rectify any existing problems as long as it does not exacerbate them. As above, a habitats survey and protected species survey will be completed to the appropriate standards, in accordance with relevant legislation. Any application for development will be dealt with in consultation with the Environment Agency.</p> <p>Policy will be amended to ensure that new proposals consider how they can improve the ecological status of the Bow Brook .</p> <p><b><u>ACTION – Insert criterion into Policy which reads “proposals should consider how they can improve the ecological status of the Bow Brook”</u></b></p> <p><b><u>ACTION – Insert sentence into Reasoned Justification which states “Proposals should consider how they can improve the ecological status of the Bow Brook by considering the ‘Bow Brook Biodiversity Delivery Area statement’ by Worcestershire Biodiversity Partnership.”</u></b></p>
<p>Foxlydiate Lane and Church Road are tree lined and this should remain.</p>	<p>Any removal of trees to enable development will be kept to a minimum and should not be detrimental to the character of the area.</p> <p><b><u>ACTION – Amend Policy to read “vii. Planting and landscaping must be incorporated (<i>informed by a hedgerow assessment</i>), to enhance....”</u></b></p>
<p>The imposition of large amounts of street and house lighting, the</p>	<p>Planning Conditions can be assigned to planning applications in order</p>

disturbance and loss of habitat to birds and bats, noise from thousands of car and lawnmowers would all have a detrimental impact on the variety of native species.	to minimise impact during the construction phase. There will be a level of impact but design of development informed by a habitats survey can mitigate against long term impacts.
Mitigation for Great Crested news is based on old data from Spring 2011. Analysis flawed and should be discounted.	The Council has not commissioned a survey for Great Crested Newts on this site and any mitigation must be informed by up to date species survey before any planning permission is granted.

## KEY ISSUE: Flood Risk

<b>Sub Issues</b>	<b>Officer response</b>
The ADR is a recognised flood plain and liable to flooding.	A small section of the site is classed by the Environment Agency as falling within Flood Zone 2, not the whole former ADR site. Any development will be directed away from this portion of the site. A detailed Site Specific Flood Risk Assessment will consider areas at risk and appropriate mitigation measures will be employed.
Increased flood risk could make catchment ponds within the development ineffective	The full impact of development on the surrounding water environment will need to be considered through a Site Specific Flood Risk Assessment. The Environment Agency will be consulted with this assessment to ensure their satisfaction.
<p>The area will be unable to deal with additional water run-off and it will have a detrimental effect on downstream areas. Rivers and watercourses cannot cope with further surface water from proposed developments.</p> <p>Development will impact on Bow Brook and tributaries that run into Norgrove Pool, Elcocks Brook and Shell Brook.</p> <p>The Bow Brook floods regularly with water flooding into gardens. It cannot cope with farmland run-off and water from existing houses at present, following heavy rain. This has consequences for a number of settlements in the Bowbrook ward, and also for a number of other settlements in the Wychavon District. Properties are flooded by these</p>	<p>PPS 25/ NPPF requires that surface water run-off cannot be higher than the greenfield site at present, and should aim to improve current rates. A Site Specific Flood Risk Assessment (FRA) will need to determine how this can be achieved for this site. This assessment will also address downstream effects of development. A FRA will take account of flooding from all sources and historic flooding.</p> <p>Drainage mitigation measures will be detailed within the site specific FRA and although unlikely, any potential for downstream pollution should be considered.</p>

events but the Environment Agency has not been able to come up with a satisfactory alleviation scheme. Development will lead to increased rain water run-off and higher volume outfall from sewerage treatment works. If it is decided that an urban extension has to take place in these areas, it is essential that substantial mitigation measures, such as holding tanks, are included in the conditions for development.

More development will inevitably affect Elcocks Brook and Shell Brook, as the main rivers joining the Bow Brook, impacting even more villages in the Wychavon area.

Strategic Site covers land to the south down Crumpfields Lane towards Elcocks Brook. This is an intensive farming area of high quality land with much diversity (grazing pasture for sheep and cattle, cereal, rape seed and other fodder crops), it is also a very active leisure area for outdoor sports providing fishing, shooting on the farms and horse riding, cycling, walking and running on the small lanes, footpaths and bridle paths that cover the area. The land slopes down towards the Elcocks Brook valley. Heavy rains causes the Brook to flood under normal conditions but recent heavy rains caused serious flooding of the roads, ditches and the brook itself.

The site overlaps with a section of the Swan Brook catchment. This is an area that falls within the headwaters of the Bow Brook. The need for drainage and the risk of polluted runoff must be robustly dealt with in any allocation or planning application.

Cannot mitigate against rain falling from the sky. No. 12 Crumpfields Lane front where they are trying to build a new house is waterlogged.

Concern localised flooding will be magnified. Potential for flooding at

<p>Pumphouse Lane, Feckenham (Village, Electrical Switching Station, First School), Himbleton, Sale, Bentley, Droitwich Spa, Worcester Road, Salwarpe, Elcocks Brook, Droitwich Canal Basin, Vines Park in Droitwich, Huddington, Himbleton and road to Hanbury. Swan Brook along with a number of other smaller watercourses flow into Bow Brook prior to draining into the River Avon at Defford. Bow Brook flows through various settlements in Wychavon including Shell, Himbleton, Huddington and Pershore and many of these have experienced flooding from the brook.</p> <p>Urge careful consideration for the potential for flooding downstream within Wychavon and request the implementation of suitable mitigation measures to prevent increased occurrence of flooding in these areas as a result of any additional development at site 1. The SFRA should take this into account.</p> <p>The hilly lanes cause water to flow down the verges to cause problems further along, e.g. to Swansbrook Lane (Feckenham) and Green Lane (Callow Hill). The loss of fields which comprise the ADR would lead to more water run-off.</p> <p>The whole ADR is highly impermeable and soaked; any development upstream can only exacerbate the situation because the ground is not permeable.</p> <p>[Photographic Evidence of local flooding supplied by M Hughes Saved in BORLP4 Consultation Repts Supporting Evidence]</p>	
<p>Bromsgrove District Council, Redditch Borough Council, Council Drainage Engineers, Environment Agency, Severn Trent Water, Highways Agency and British Waterways, Developers, Council Officers and Councillors must be prepared to be held culpable if future flooding occurs if this development takes place.</p>	<p>Any proposals for development on the site would be consulted upon with the Environment Agency and the Councils Drainage Engineer. The developer would be responsible for ensuring that the any required appropriate mitigation measures are in place.</p>

<p>Development would not lead to an increase in the potential for flooding in the area and the proposed development itself would not flood.</p>	<p>Noted. However, any proposals for development on the site would be consulted upon with the Environment Agency and the Councils Drainage Engineer. The developer would be responsible for ensuring that the any required appropriate mitigation measures are in place in order for planning permission to be granted.</p>
<p>The policy could pick up Water Framework Directive. In this case, the site is covered by the Bow Brook water body.</p> <p>Source to Lett's Mill River which is currently classed as 'moderate' status. The aim is to achieve 'good status' by 2027. This development site should seek the opportunity to improve the waterbody catchment i.e. to meet 'good status' by inclusion of measures to enhance water quality and biodiversity for example.</p>	<p>The 'Bow Brook Biodiversity Delivery Area statement' by Worcestershire Biodiversity Partnership states that the Bow has been identified as failing to meet 'good ecological status' as required by the Water Framework Directive. This statement also set out how good status will be achieved and by whom.</p> <p>Policy will be amended to ensure that proposal consider how they can improve the ecological status of the Bow Brook.</p> <p><b><u>ACTION – Insert criterion into Policy which reads “Proposals should consider how they can improve the ecological status of the Bow Brook”</u></b></p> <p><b><u>ACTION – Insert sentence into Reasoned Justification which states “Proposals should consider how they can improve the ecological status of the Bow Brook by considering the ‘Bow Brook Biodiversity Delivery Area statement’ by Worcestershire Biodiversity Partnership.”</u></b></p>
<p>Advise that a line is included to confirm 'flood modelling will be required as part of any site specific FRA'.</p>	<p>A sentence will be included as per recommendation.</p> <p><b><u>ACTION – Insert sentence into Policy to read “xii. Any necessary measures to mitigate flood risk are to be implemented and flood modelling will be required which must be outlined in a site specific FRA.”</u></b></p>
<p>All built development should be located within Flood Zone 1 given the size of the site and area of floodplain. Therefore the last paragraph of the Reasoned Justification should be removed to avoid confusion</p>	<p>Agreed, the last paragraph of the Reasoned Justification will be removed to reflect that development should only be permitted in flood zone 1. However for clarity a sentence will be inserted into the Policy</p>



<p>(which refers to safe development requirements and evacuation plans).</p>	<p>which states this.</p> <p><b>ACTION – Remove the last paragraph of the Reasoned Justification regarding safe development requirements and evacuation plans.</b></p> <p><b>ACTION – Insert the following sentence into the Policy “<i>xii. any necessary measures to mitigate flood risk are to be implemented and flood modelling will be required which must be outlined in a site specific FRA. <u>Development will only be permitted in Flood Zone 1.</u></i>”</b></p>
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## KEY ISSUE: Landscape

<b>Sub Issues</b>	<b>Officer response</b>
<p>Area (semi-rural location) is high quality landscape, too precious to be decimated by building.</p> <p>The residents should not be deprived of any natural beauty. Its importance (historically and in terms of biodiversity) should be protected and preserved for future generations.</p> <p>Need to protect countryside and choose every alternative option to prevent it being developed.</p> <p>Surrounding countryside is a feature of the area (Redditch unique selling point), development will contribute to the ruining the fabric of the area.</p> <p>There are no green spaces left in Redditch. Redditch is not blessed with a high percentage of the green space. Planning for the future we hope will not remove this comparatively small area. This area is the</p>	<p>The landscape is considered to be highly sensitive (on the WCC Landscape Character Assessment Sensitivity Map). It is important that special features of the landscape are retained and enhanced. The policy requires development to be of a sympathetic design, to respect topography of the site and to ensure green infrastructure and landscaping are incorporated into the site. This should all assist in ensuring that the development is not overly intrusive into the landscape. However the policy will be amended to ensure these features are retained.</p> <p><b>ACTION – Amend Policy to read “<i>iii. the open character of the site <u>and special features of the landscape should be retained through sympathetic design...</u></i>”</b></p> <p>In addition, the policy will be amended to ensure that a hedgerow assessment informs proposals.</p>

<p>'lungs' of Webheath and important to the well –being of the community.</p> <p>Development here would be visually intrusive to the landscape and the setting which is in good condition. (WYG 2009, p24). Development in the area will spoil views.</p> <p>The English countryside needs more protection if it is not to be disfigured by development.</p>	<p><b>ACTION – Amend Policy to read “vii. Planting and landscaping must be incorporated (<u><i>informed by a hedgerow assessment</i></u>), to enhance....”</b></p> <p>The former ADR is not designated as open space and therefore its loss would not result in open space loss. Overall, the open space provision across the Borough is high.</p>
<p>Undulating land, which gives the area its character, will be levelled for building. Development will spoil natural and existing contours</p> <p>Questions whether any thought has been given to screening the planned development from residents.</p>	<p>The levelling of ground is not necessary for development to commence. The Policy states that Development should be integrated within the existing topography of the land with any excessive remodelling of the land avoided wherever possible.</p> <p>Development within the site should be well integrated into the existing urban area rather than possible screening from existing residential development, although amenity of residents will be a consideration.</p>
<p>The area as it stands offers much in the way of recreation and historical interest to cyclists, walkers and riders, and to the residents who prize its rural character.</p> <p>Development threatens public rights of way for walkers.</p>	<p>Historical assets should be considered through development proposals. The Policy will be amended which requires historic assets to be considered.</p> <p><b><u>ACTION – Amend Policy to include criterion which says “<i>The Historic Environment Record should be consulted during the formulation of development proposals to establish the potential for heritage assets and used to inform any necessary appraisal or evaluation of the site;</i>”</u></b></p> <p><b><u>ACTION – Amend Reasoned Justification to include the following, “<i>This site falls within Historic Environment Character Zone (HECZ) 146 of the Historic Environment Assessment (HEA) which has been identified as having high potential for unknown archaeology; therefore an appraisal of the site will be required</i>”</u></b></p>

	<p><b><u>prior to any development.”</u></b></p> <p>Public Rights of way will be maintained. The policy will be amended which reflects this.</p> <p><b><u>ACTION – Amend Policy to state, “x. ...networks to Redditch Town Centre and where public rights of way exist these should be incorporated into any design proposals;”</u></b></p>
<p>The area is agricultural land (including irreplaceable timbered buildings of historic value). Farm land should not be used as it is far more valuable to our long-term future and we should be self-sufficient.</p>	<p>There are no listed buildings within the Strategic Site boundary. It is considered that there is not currently a significant amount of land being used for agricultural purposes on this site.</p>
<p>Object to the development of site 3 on the grounds of urban sprawl. The Green Belt was created to prevent ‘urban sprawl’ and protect the countryside from continual pressure from urban areas.</p> <p>The proposed development in Plan 4 connecting with the further proposals for Bentley/Foxlydiat Redditch will be a massive incursion into the Green Belt and will be the start of creating a huge sprawling town without any individual identity. Should not ignore the protection the Green Belt provides, once a precedent has been created it’s very hard to go back again.</p> <p>This ‘inappropriate development’ in Green Belt land.</p>	<p>This site is not Green Belt. This area is a different designation to the areas surrounding it. This site was previously designated as Area of Development Restraint. It borders Green Belt land; therefore this land has been fully assessed as being suitable for development before any development could occur.</p> <p>The Green Belt that is being suggested for development to meet Redditch housing needs cross-boundary has been objectively assessed and is required to ensure the appropriate level of land is available to meet housing needs for the whole plan period (up to 2030). The amount of housing land needed for the next plan period would need to be reviewed at that time, in the context of the policies that exist then.</p>
<p>The only development site here that is acceptable is the infill site of Pumphouse Farm.</p>	<p>This site is not within the ADR; however this site was considered previously as part of the preparation of Local Plan No.2 and identified as part of Site 99. When the site came forward for development the owner of the land was not willing to release it for development due to a restrictive covenant. If the owner wishes to see this land come forward for development they could submit a planning application and a small yield of additional housing would result.</p>

<p>A periphery of mature trees subject to Tree Preservation Orders (TPOs) (blanket and specific) on site. There would be Loss of hedges and vegetation.</p>	<p>Trees with TPOs would seek to be retained wherever possible. If a developer suggests removing a tree with a TPO each tree would be assessed on its own merits.</p> <p>Hedgerows and vegetation will seek to be retained where possible through the development process. The Policy will be amended to ensure a hedgerow assessment is completed to inform development proposals.</p> <p><b>ACTION – Amend Policy to read “vii. Planting and landscaping must be incorporated (<u>informed by a hedgerow assessment</u>), to enhance....”</b></p>
<p>Conflict with the character of the local Conservation area</p>	<p>The closest Conservation Area is Hewell Grange; it is considered that this Strategic Site is far enough away from the Conservation Area to not impact upon it. English Heritage have not expressed concerns regarding the proximity of the Strategic Site to the Conservation Area.</p>
<p>There will be insufficient garden or amenity land</p>	<p>Any development will be assessed against the other policies in the Local Plan. The Local Plan will require an amount of open space to be provided or equivalent contributions to improve open space.</p>
<p>Will destroy traditional field patterns</p>	<p>The policy requires development to be of a sympathetic design, to respect topography of the site and to ensure green infrastructure and landscaping are incorporated into the site. In addition the policy will be amended to ensure that a hedgerow assessment informs proposals. Therefore field patterns will seek to be retained where possible; however development will need to occur on this site.</p> <p><b>ACTION – Amend Policy to read “vii. Planting and landscaping must be incorporated (<u>informed by a hedgerow assessment</u>), to enhance....”</b></p>
<p>This development will promote ribbon development between our towns changing the look of the countryside forever</p>	<p>It is not clear where the ribbon development would occur with regard to this Strategic Site. It is assumed this is with regard to the A448; in any situation there is no intention to allow Ribbon development</p>

	between Bromsgrove and Redditch.
There will be an over development of the area	It is essential that Redditch allocates the maximum amount of land possible within its boundaries to meet housing need. This area is considered to be appropriate for housing development and therefore has been allocated as a Strategic Site within the emerging plan.
An increase in vehicles will cause environmental damage	Mitigation measures to manage the level of vehicle traffic will be required and delivered; this may include any necessary environmental mitigation measures.
There will be an adverse effect on rural economy	It is acknowledged that if as a result of development any of the farms on site decide to vacate, this could be a loss to the rural economy. However, residential development is also an essential part of the economy and necessary to ensure the housing need in Redditch is met.
Creating imbalance between available local jobs and the increase in local population	Housing development and employment development are proposed as part of the emerging Local Plan. Employment would not be appropriate on the Webheath Strategic Site.
<p>Unique characteristics of the south west area: is it is chiefly unimproved pastureland of high value to wildlife</p> <ul style="list-style-type: none"> <li>• Hedgerows having been kept</li> <li>• Streams that follow natural meandering courses</li> <li>• Undulating topography</li> <li>• Many historic timber framed houses and barns</li> <li>• A rich rural history (Feckenham forest and common)</li> <li>• Very high cyclist usage</li> <li>• Superb footpath network</li> <li>• Accessible via quiet lanes leading out from town.</li> </ul>	A number of these features will be retained alongside the Strategic Site designation or can be mitigated against through the design process. It is essential that Redditch allocates the maximum amount of land possible within its boundaries to meet housing need. This area is considered to be appropriate for housing development and therefore has been allocated as a Strategic Site within the emerging plan
The area is an area of outstanding natural beauty.	There are no designated Areas of Outstanding Natural Beauty within or adjacent to Redditch.

KEY ISSUE: Sustainability

Sub Issues	Officer response
There are more sustainable alternative locations on which to build	See Officer response Policy 4 – Housing Provision
What is the rationale for choosing this location	It is essential that Redditch allocates the maximum amount of land possible within its boundaries to meet housing need. This area is considered to be appropriate for housing development and therefore has been allocated as a Strategic Site within the emerging plan.
There is no employment in the area and existing employment areas are remote from this site (across Redditch).	The emerging Local Plan No.4 will allocate employment land to meet needs up to 2030, this land will be allocated in the most suitable places, Webheath Strategic Site is not considered to be a suitable location for employment development. With regard to existing employment sites, it will be a requirement on the application for the Strategic Site to demonstrate how employment can be accessed from the site, any measures necessary to ensure employment is accessible will be implemented by the developer.
Redditch can offer sufficient opportunities for employment	Noted.
Object to the development of site 3 on the grounds of sustainability	The sustainability of the site has been considered when allocating land for development, it is considered that this site is suitable to accommodate housing development. In particular as the need to allocate sufficient land for housing outweighs the need for the site to remain as an ADR.
<p>More noise, light and crime disturbances to the houses located in Defford and Blockley Close.</p> <p>Noise levels need further investigation</p> <p>More people means more crime in Webheath, currently have low crime rates and is safe.</p> <p>The area will have more litter, graffiti and property damage</p>	<p>Planning Conditions assigned to planning applications can minimise impact during the construction phase.</p> <p>With regard to crime, the community safety team will be consulted on any planning application and therefore the opportunity for crime should be minimised through good design. In addition the emerging plan contains policies which seek to ensure high quality and safe design is maximised and development reduces opportunities for crime and the fear of crime.</p>
New houses will eliminate resident's privacy and quality of life.	The emerging Local Plan contains policies which seek to ensure new developments are designed to a high standard and that amenity space and quality of life are retained though the design process.

<p>Redditch Borough Council have a duty to consider residents health and wellbeing, (and are partners in wellbeing board) the living environment forms an essential part of well-being this proposal will spoil current leisure and relaxation found in the location.</p>	<p>Although it is acknowledged the land may be currently used for recreational activities it is a legal requirement that the Borough Council provides sufficient land for new housing. This site is deemed to be suitable to meet some of this housing need. In addition the area is privately owned and therefore its use may depend upon the wishes of the owners regarding recreational activities. Redditch currently has a high standard of open space which will be retained and improved through the emerging plan, this open space is available for all residents to use and enjoy.</p>
<p>There is a distinct lack of community within the districts of Redditch and this added pressure will stall cohesion in the town Facilities in the South west of the town are extremely poor. In the past amenities and shops were promised and they never materialised e.g. Walkwood, Hunt End, and Callow Hill to the south of Windmill Drive.</p>	<p>It is not for new development to rectify existing deficiencies, however new development cross-border in Bromsgrove will provide the community facilities that are required.</p>

## KEY ISSUE: Historic Environment

<b>Sub Issues</b>	<b>Officer response</b>
<p>Development may damage historic or architectural value of listed buildings in the area including Norgrove Court (Grade I listed)</p> <p>[Photographic evidence submitted by E Morris regarding effect of development on Norgrove Court and Monarchs Way – Email saved in BORLP4 Supporting Evidence]</p>	<p>The boundaries of the site were set to ensure that Norgrove Court would not be affected by development. Norgrove Court is protected by national legislation and therefore development is required to respect this designation or setting.</p>
<p>Stressed the importance of this ancient area - The site has archaeological value and Medieval Ridge and Furrow Fields systems are still intact (Archaeological Report Taylor Wimpey) and should be preserved and Monarch's Way.</p>	<p>Anything that is deemed to be of archaeological significance should be protected. Worcestershire County Council archaeological department would be consulted as part of any appropriate planning application. The policy already contains a requirement for an archaeological survey to be produced.</p> <p>Monarchs Way does not pass through the site but runs adjacent to it.</p>
<p>The findings of the Historic Environment Assessment should inform</p>	<p>This site falls within Historic Environment Character Zone (HECZ) 146</p>

<p>master planning the Strategic Sites including green infrastructure planning.</p>	<p>of the Historic Environment Assessment (HEA) which has been identified as having high potential for archaeology; therefore an appraisal of the site will be required prior to any development. The Policy will be amended which requires applicants to complete an archaeological appraisal to an appropriate level prior to development.</p> <p><b><u>ACTION – Amend Policy to include criterion which says “The Historic Environment Record should be consulted during the formulation of development proposals to establish the potential for heritage assets and used to inform any necessary appraisal or evaluation of the site;”</u></b></p> <p><b><u>ACTION – Amend Reasoned Justification to include the following, “This site falls within Historic Environment Character Zone (HECZ) 146 of the Historic Environment Assessment (HEA) which has been identified as having high potential for unknown archaeology; therefore an appraisal of the site will be required prior to any development.”</u></b></p>
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## KEY ISSUE: Infrastructure – General

<b>Sub Issues</b>	<b>Officer response</b>
<p>Current Infrastructure is at capacity. No more houses, shops or schools are needed. Village does not have enough resources to support development - there are no local GP surgeries, dentists, childcare, shops, pubs, sports and recreation facilities in the area.</p> <p>There is a refurbished Village Hall, and a Church Hall facility. No further meeting places are needed.</p> <p>There are two shops and a post office in Webheath. No more are needed. A major supermarkets coming in to the area would have a</p>	<p>No further facilities are being proposed in the Webheath area however, development of 2800 dwellings cross boundary is likely to require new community facilities including doctors, dentists, shops etc. Therefore, the infrastructure to be provided will need to support the amount of residential development proposed.</p>



detrimental effect on the two local shops.  The area lacks shopping facilities. A 'local Tesco' would not support development.	
The area would benefit to improvements in local infrastructure – schools and other amenities.	Noted. No further facilities are being proposed in the Webheath area however, development of 2800 dwellings cross boundary is likely to require new community facilities including doctors, dentists, shops etc. Therefore, the infrastructure to be provided will need to support the amount of residential development proposed.
Do not need new facilities when there are facilities in Redditch.	Local facilities are intended to serve local convenience needs, it is essential this infrastructure is provided in the appropriate locations to ensure development is sustainable.
Halcrow have demonstrated that Webheath lack accessibility	Webheath Strategic Site was considered in the 2010 Transport Accessibility Study completed by Halcrow. This study suggested that enhancements would need to be made to all sustainable modes of transport (bus, cycle and walking) to ensure an adequate level of accessibility could be reached. These measures will be implemented as part of any development proposal to ensure Webheath Strategic Site is a sustainable and suitable development location.
Concern over who will pay for the additional services needed – Bromsgrove or Redditch?	Any development proposed will be expected to provide any supporting infrastructure required, therefore the Developers would fund this infrastructure. In addition, the Council may prepare a Community Infrastructure Levy which will ensure development contributes the infrastructure required to support the development proposed through the emerging plan.
Redditch already needs a new fire station	Consultation response on behalf of Hereford & Worcester Fire and Rescue Service (HWFRS) indicates that a new capital facility is not required in order to fulfil their statutory obligations. However, West Mercia Police (WMP) will require the provision of a new dedicated police station in Redditch in the long term.
Webheath is furthest from the main supply of electric stations	Any development proposal will be required to ensure that the development can connect to all amenities.

## KEY ISSUE: Infrastructure – Education

<b>Sub Issues</b>	<b>Officer response</b>
<p><u>First schools:</u> Local schools are at full capacity. A new school would have to be built.</p> <p>There are two first schools in the area (Webheath First School Academy and Our Lady of Mount Carmel Catholic First School) they are fully subscribed.</p> <p>Webheath First School (Academy) (the only local school freely open to all residents) is oversubscribed by 100% (annual intake of 60 pupils / 120 applicants), and has indicated that it has no desire to become any larger. In September 2012 only 60 children out of 168 applicants, almost all within catchment managed to secure a place at Webheath First School. Only 36% of applicants to attend the first school were offered the place they requested.</p> <p>The two Downsell Road primary schools are oversubscribed any children over primary school age have to travel outside the area as the nearest school is Walkwood.</p>	<p>Approximately 1000 houses can sustain a one form entry first school; therefore the cross-boundary housing proposed would be expected to generate approximately 96 additional pupils per year group. There are currently very few first school spaces remaining across Redditch. Therefore two new first schools would be needed on-site, each to be capable of accommodating up to 60 children per year group, to be provided alongside the phases of housing.</p>
<p><u>Middle or High school</u> There is no readily accessible Middle or High school. Unless a new Middle School is to be built, children will probably go to Walkwood Middle School. The campus that accommodates Walkwood and The Vaynor First School is the biggest campus of under 14s (those most likely to be taken to school by car) in the Country. The effect on local residents from this is already a huge problem which will get worse.</p> <p>The nearest middle schools are Walkwood and Holyoaksfield which</p>	<p>It is not clear at the moment that an additional middle school is needed; however this could change depending on pupil numbers and if there were any catchment area changes. Worcestershire County Council periodically refreshes their requirements to take account of all changes. Therefore, there are no proposals currently to include the provision of a middle or high school in this area as middle and high schools in Redditch currently do have spare places (138 places in current Year 5 and 155 places in current Year 9). It will be a requirement of any development to ensure an adequate Travel Plan is</p>

are approximately 2.0/2.5 miles.  The Nearest High Schools are Trinity High School And St Augustine's Catholic High School which are at least 2.5 / 3.0 miles distance from the proposed Development areas.  A High School will be required.	provided which demonstrates how education facilities will be accessed, with any supporting infrastructure necessary to achieve accessibility provided by the developer.
Concern whether Bromsgrove will supply new schools for Redditch residents.	The cross-boundary housing proposed (in Bromsgrove) would be expected to generate a need for two new first schools on-site (each to be capable of accommodating up to 60 children per year group, to be provided alongside the phases of housing).
As Foxlydiate housing will be built on 'Bromsgrove' Land how will catchment areas be sorted out.	Consideration does need to be given to which catchment areas the developments would fall into and any change would need to be the subject of a formal consultation.
The area will be blighted by the sight of new school buildings and all the unsociable behaviour that goes with it.	Education provisions will be necessary to ensure the cross boundary development is sustainable. It will be important to ensure the cross boundary development is masterplanned to achieve high quality design and development.

## KEY ISSUE: Infrastructure – Funding

<b>Sub Issues</b>	<b>Officer response</b>
Concern over who will pay for the infrastructure required to support development	Generally developers will fund the infrastructure. The Infrastructure Delivery Plan (IDP) will identify the funding streams
Reduction in public spending for all services i.e. Police, NHS and Local Authority amounting to cuts of 20% over 5 years does not sit well with the plans to increase the housing numbers	Noted. However, the Borough and District Councils have a requirement to ensure housing needs are provided for. Public spending cuts to Police and NHS Services are outside of the control of the Council.
Concern over how would Redditch B.C., the Police and the Emergency Services cope with the extra services required for thousands of new households.	Consultation with key stakeholders is on-going, their requirements are acknowledged and the service provision would need to be maintained.
Although some capital investment may be forthcoming from	On-going costs have not been identified; however grounds

developers to support major infrastructural work, the not inconsiderable on-going costs would have to be borne by Redditch council at a time when councils are already strapped for cash.	maintenance etc will be dealt with through council tax and other legal/management arrangements.
The additional housing would have severe cost implications for the resources of Severn Trent Water services	Severn Trent are being consulted on an on-going basis during plan preparation. Developers will be expected to pay for some of their initial infrastructure requirements, however Severn Trent have a legal obligation to ensure connections are made to new development, with the appropriate solutions in place.

## KEY ISSUE: Infrastructure – Health

<b>Sub Issues</b>	<b>Officer response</b>
<p>Alexandra Hospital will not cope with additional strain on resources from additional development. The current AE is being downgraded and services within Redditch cut. AE departments are overstretched.</p> <p>Serious concern over potential loss of services at Alexandra Hospital, particularly A &amp; E and likely transfer of NHS services to Birmingham.</p> <p>Concern over where 7,800 new patients will go for hospital treatment.</p> <p>Worcester Royal Hospital cannot support development.</p>	<p>Worcestershire Acute Hospitals NHS Trust was consulted on this proposal and is aware of the amount of development needed and population changes up to 2030. The Councils will continue to engage with the Trust through the Infrastructure Delivery Plan (IDP) process.</p>
<p>Doctors cannot cope with the amount of patients currently. Concern whether residents of new developments will use Redditch surgeries instead of Bromsgrove's, concern how surgeries will cope with 7,800 new patients. GP practices are full to capacity this is unsustainable to provide a service for existing population (of which it has 3% higher elderly population than national average and ¼ population obese).</p>	<p>Patient choice dictates which surgeries will be used by new residents. Any infrastructure needed to support development will be initially funded and provided by developers.</p>
<p>The population growth predictions by the Trust do not match the ones given in report and are out by 4 years, when population grows exponentially this is unsustainable.</p>	<p>The NHS Trust have been consulted up the planned growth needs for the Borough and population changes up to 2030.</p>

## KEY ISSUE: Infrastructure – Utilities

Sub Issues	Officer response
This area suffers from numerous power failures which leads to concern that in the event of additional housing the sub stations will be unable to cope	Electricity supply is not considered to be an issue on this site; this has been confirmed by the infrastructure providers.
Gas and electricity are difficult to install	Consultation with the infrastructure providers including Western Power Distribution and National Grid is on-going to determine the infrastructure needed to support development. However, Electricity supply is not considered to be an issue on this site, this has been confirmed by the infrastructure providers.

## KEY ISSUE: Infrastructure - Sewage Treatment / Water Quality

Sub Issues	Officer response
Sewage treatment is unsustainable, it will increase carbon emissions (which contravenes Government targets) and providing a pumping station for sewage removal would be contrary to the RBC Climate Change Strategy	<p>It is unclear whether the carbon emissions related to sewerage treatment in this area will contravene Government targets. However, sewage treatment is necessary to support development. Severn Trent have advised that pumping sewerage uses a limited amount of electricity and has minimal maintenance and therefore has a limited environmental impact.</p> <p>There are no specific actions in the RBC Climate Change Strategy regarding sewage.</p>
Pumping sewage to Spenal is not a sustainable option	There are many aspects to sustainability that need to be considered and this is only one to be considered in allocating sites. The Council is working with Severn Trent to find the most sustainable option for sewage treatment.
Gravity drainage to Priest Bridge is costly (£2.5m)	This cost is correct however no decision has yet been made over whether this method of drainage would be used. If this method is used Severn Trent would have to find the finance and factor it into their delivery plans.

	Another option would be to provide a new pumping station. The estimated cost for this would be £100,000 plus annual operating costs.
Development will causes contamination (pathogens) to Curr Lane Wells, drinking water, public water supply and water gathering grounds	Development is not allowed to pollute groundwater wells; this will be ensured through the planning application process in consultation with the Environment Agency and Severn Trent Water Limited. This site is not covered by a Groundwater Protection Zone.
Development will cause sewerage problems, Sewerage will not be able to cope. Development at Webheath will disturb Webheath sewerage farm, likely to cause contamination.	STWL have advised that Webheath sewage treatment works was abandoned many years ago and replaced with a pumping station off Church Road. STWL are currently completing hydraulic modelling assessments on how the development in this area could affect sewerage flood risk. If assessments indicate that additional capacity is required then Severn Trent would plan to undertake the required capacity improvements to align with the construction phasing of any new development.
Development in the area will put pressure on the system which will lead to waste flowing into Elcocks Brook, Shell Brook, Feckenham and elsewhere. This is highly likely to cause flooding problems at Bentley and other downstream villages in Wychavon.	Severn Trent are currently completing hydraulic modelling assessments on how the development in this area could affect sewerage flood risk. If assessments indicate that additional capacity is required then Severn Trent would plan to undertake the required capacity improvements to align with the construction phasing of any new development.
There is an old contaminated sewage works within the Taylor Wimpy site which have a moderate risk of containing contaminants, including asbestos, pathogens, heavy metals and Ph hydrocarbon. The document suggests that the scrap yard at the junction of Dagnell End Road and Ickniel Street may present an added constraint to this site for development, due to an advisory 250m exclusion zone. This is understood, but in a similar vein, the Webheath ADR land includes an area of disused sewage works yet this is not seen as any form of constraint or as requiring any form of exclusion zone. Why is there no consistency between the focussed appraisal assessments on issues such as this?	Severn Trent have advised that Webheath sewage treatment works was abandoned many years ago and replaced with a pumping station off Church Road.

Development will pass on unnecessary costs to STWL customers.	Severn Trent have a duty to find the finance that is necessary and factor it into their delivery plans.
Object to the development of site 3 on the grounds of strain other on local infrastructure (especially drainage – Seven Trent prefer Bordesley).	Severn Trent are currently completing hydraulic modelling assessments on how the development in this area could affect sewerage flood risk. If assessments indicate that additional capacity is required then Severn Trent would plan to undertake the required capacity improvements to align with the construction phasing of any new development.
Providing additional sewerage infrastructure will damage the local environment and area.	There is a requirement for all new development to be linked to sewerage infrastructure, therefore this is a necessity. Severn Trent are responsible for delivering this infrastructure and they would want to keep environmental impact to a minimum where possible.
All properties to be built with roof top solar panels installed in order to offset the energy requirements of the sewage pumping operation.	This is too prescriptive to request through the Local Plan process. Severn Trent have advised that pumping sewerage uses a limited amount of electricity and has minimal maintenance and therefore has a limited environmental impact.
Developers should fund the provision, maintenance and management of all water handling at the development in perpetuity. This to include: the handling of run-off water, maintenance and protection of existing water courses and any flora and fauna therein.	Agreed, Developers are required to ensure that water is managed in an appropriate manner, they are required to ensure all necessary infrastructure is funded.
Lack of drainage (in both rainwater and sewage)	With regard to surface water, the developer will be required to ensure that this does not exceed current greenfield run-off rates. With regard to sewerage drainage the Developer, in consultation with Severn Trent are required to ensure there is adequate sewerage provision and that this is funded and provided when appropriate.
Pumping main is required with constant threat of failure so Foul Cisterns for 24 hour Retention in the event of failure are required under the Approved Document of the Building Regulations. There is no mention of these.	Severn Trent have advised that Pumping Stations have various systems that monitor performance (for example; whether the pumps are working correctly, if the level in the sump is higher than expected, whether there are any issues with the pressure main) and so if the monitoring systems identify any abnormalities then there are telephone alarm systems in place to seek operational attendance. Also to reduce the risk of sewage escaping which operational help is

	on its way, there is emergency capacity provided within the sump to temporarily store flows.
To add to costs of energy is the annual cost of pumping water from Cur Lane Wells into the Bow Brook in order to dilute the Stream, a cost which is about £37,000 per year.	All necessary pumping (which will be discussed with Severn Trent L) will be funded and paid for between Severn Trent and the Developer.
Sewage flooding exists in Brotherton Avenue and Packwood Close.	The developers are required to complete a Site Specific Flood Risk Assessment as part of any planning application. This assessment must show flood risk from all sources of flooding as a result of development on the site. The developers of the Strategic Site are not required to correct any existing problems, they will be required to ensure mitigation measures are in place should development at the Strategic Site exacerbate any flooding.
Sewers within Redditch are operating at capacity and are suffering from problems of storm water infiltration into the foul sewers, even though there is also an extensive network of storm water sewers within the town. Redditch town suffers from urban runoff and underlying impermeable clayey substrata. The rapid response of the catchments, coupled with a lack of highway drains maintenance, also attributes to flooding of the road system and overloading of the sewers. Coupled with Global Warming and the increased rainfall due to climate change this situation can only get worse. Webheath in particular has small size pipes and this can cause flash flooding and flooding to downstream villages.	<p>The developers are required to complete a Site Specific Flood Risk Assessment as part of any planning application. This assessment must show flood risk from all sources of flooding as a result of development on the site. The developers of the Strategic Site are not required to correct any existing problems; they will be required to ensure mitigation measures are in place should development at the Strategic Site exacerbate any flooding.</p> <p>With regard to the Sewerage infrastructure, STWL are currently completing hydraulic modelling assessments on how the development in this area could affect sewerage systems. If assessments indicate that additional capacity is required then Severn Trent would plan to undertake the required capacity improvements to align with the construction phasing of any new development to ensure sewerage infrastructure is operating a maximum capacity.</p>
There is a threat to health of occupants through previous contamination	It is acknowledged that there is a disused sewage treatment plant within the area. However, mitigation measures relating to the disused sewage treatment plant would require further detailed assessment to ensure there no harm to soil or water quality occurs.
Severn Trent Water have indicated that there is sufficient network	Noted.



capacity to support the proposed development and that a suitable connection from the site can be made.	
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KEY ISSUE: Emergency Services Infrastructure/developer contributions

<b>Sub Issues</b>	<b>Officer response</b>
Developer contributions, will be required from new development in order to develop a new police facility in Redditch	West Mercia Police have confirmed that the provision of a new dedicated police station in Redditch in the long term is required. However, the funding for this has not yet been confirmed.

KEY ISSUE: Transportation – Public Transport

<b>Sub Issues</b>	<b>Officer response</b>
Public transport system inadequate and infrequent.  There is no clearly identified provision of sustainable transport to and from Redditch and the surrounding areas.  No public transport links from Redditch Town Centre, as buses stop after 6:30pm.  No direct bus route to the Alexandra Hospital.  There is, currently, very poor provision for buses (take a journey on the 143 from Bromsgrove to Redditch to appreciate the difficulties as an example).	A Report was completed by Halcrow (in conjunction with Worcestershire County Council) in 2010 which states which bus services should be provided to support development at Webheath Strategic Site. This Report states that “consideration should be given to extending the 68 service so that it calls within the Webheath development. Consideration should also be given to providing equivalent service of 55A and 56A in the daytime to the Hospital / South East of Redditch.” It is acknowledged that since this Report was completed the 68 service has been removed. This will be factored into the bus improvements that will be necessary to support development on this site. However the exact bus route to support development of the site is not yet defined, and won’t be necessary until a planning application is submitted.
The ‘mitigation’ of adding more buses is reduced because the roads round the affected areas are narrow, winding and hilly, which would make the presence of buses a danger rather than a resource  Buses will clog up narrow lanes in the area.	Bus services would only be provided on roads that are appropriate to have them; Worcestershire County Council have highway standards to ensure this is the case.
Whether or not increased public transport opportunities were to be	The Choose How You Move Project Manager has advised that the

<p>offered, it is noted in a recent report that most car owners would choose to drive.</p> <p>People would not travel sustainably as people who live in this area use private cars to travel to work, transport their children to first schools in Webheath and Batchley, Middle schools in Walkwood and Batchley and High Schools in Crabbs Cross, Woodrow and Redditch town centre.</p>	<p>Choose how you move in Redditch baseline report identified that, prior to the project commencing, most car drivers in Redditch would choose to drive. However, interim results are suggesting that the intensive travel marketing (personalised travel planning) campaigns, investments in infrastructure and improvements in the quality and availability of information are leading to behaviour change. Whenever new developments are planned and proposed through the planning process, a central aim is to ensure that these developments are designed to be sustainable. This includes a wide range of measures, including the provision of enhanced passenger transport, walking and cycling opportunities to ensure that new residents can take full advantage of local services and facilities without being reliant on access to a car. This is a critical to ensure that new residents enjoy a high quality of life.</p>
<p>The proposed but not confirmed single circular bus route from Webheath would start too late in the morning and finish too early in the evening (7pm) to be a viable method of transport especially for people who may want to go out in the evening.</p>	<p>These details have been passed to Worcestershire Highways for information, however these kinds of details can be confirmed at the planning application stage and this doesn't affect the sustainability of the site and its potential for housing allocation.</p>
<p>Site is far from the railway (which should be used to the full as Alvechurch is upgrading)</p>	<p>Although the site is not adjacent to the Train Station it is still accessible from the site by public transport.</p>
<p>Webheath is a 30 minutes' walk to the town centre, train and bus stations and the bus service is now greatly reduced.</p>	<p>A Report was completed by Halcrow (in conjunction with Worcestershire County Council) in 2010 which states which what improvements must be made to ensure the site is accessible. These improvements would need to be funded by the developer.</p>
<p>Concern over potential bus route through Great Hockings Lane – A bus route would not be sustainable as there aren't enough people who would use the bus to make bus services viable.</p>	<p>The population needed to support a bus service would be discussed with Worcestershire County Council, they will request a service is provided which is appropriate to support the development.</p>
<p>Public transport would only be short term until it became unviable after initial 'incentives' run out.</p> <p>Developers should also fund or support the provision of additional bus services to the development for a period of 10 years following the</p>	<p>It will be a requirement to ensure the developers of the site provide and fund a bus service for an agreed amount of time until it becomes self-sustaining. Developers would agree this term with Worcestershire County Council.</p>

completion of sale of the first property at the development	
Site is far from buses. The nearest bus routes are at Springvale Road or Birchfield Road.	It is envisaged that the bus service to be provided to support the development of the Strategic Site will run through the development site. The route of any service provided is not defined yet.
There is no clear and binding (on the developers) requirement to deliver additional (not re-routed) bus services, into and out of the development.	<p>A Report was completed by Halcrow (in conjunction with Worcestershire County Council) in 2010 which states which bus services should be provided to support development at Webheath Strategic Site. This Report states that “consideration should be given to extending the 68 service so that it calls within the Webheath development. Consideration should also be given to providing equivalent service of 55A and 56A in the daytime to the Hospital / South East of Redditch.” It is acknowledged that since this Report was completed the 68 service has been removed. This will be factored into the bus improvements that will be necessary to support development on this site. However the exact bus route to support development of the site is not yet defined.</p> <p>It is envisaged that the bus service to be provided to support the development of the Strategic Site will run through the development site. The route of any service provided is not defined yet.</p>
When the new town was built, small employment estates were built close by to try to reduce excessive car journeys. This would not be the case in Webheath. Do we really want to plan development which will see significant car journeys in our town? What happened to Choose How You Move's ambitions of people walking and cycling?	<p>The emerging plan will designate appropriate land for employment use. Although employment land is not designated near to the site the developers will need to ensure that employment opportunities are accessible.</p> <p>The Choose How You Move Project is still being rolled out in Redditch and seeks to achieve a modal shift from private car use to sustainable modes of travel (such as public transport, walking and cycling).</p> <p>In addition the emerging local plan also contains policies which seek to achieve a modal shift from private car use to other sustainable modes in the Borough.</p>

## KEY ISSUE: Transportation – Road Infrastructure

Sub Issues	Officer response
<p>Current surrounding road network (including Church Road, Foxlydiate Lane, Heathfield Road, Birchfield Road, Norgrove Lane, Blackstitch Lane, Curr Lane and Pumhouse Lane) inadequate to accommodate additional traffic volumes (up to 600 dwgs - 2 cars to every household therefore an increase in some 6,800 and deliveries to shops and homes, increased activity around schools and all the services the council provide) and construction traffic and new development. Lanes/ roads too narrow, undulating, no pavement, parked cars, have dangerous bends, humped back bridges some with weight restrictions, dips and junctions and are without pavements</p> <p>The impact of more vehicles travelling along the Bromsgrove highway will cause great problems at the Bromsgrove roundabout.</p> <p>Church Road is used by farm vehicles, sheep, tractors horse riders, pedestrians, joggers, running clubs, dog walkers and cyclists. It is not suitable for any additional traffic (WAG Highway infrastructure Audit Map).</p> <p>Development will increase traffic problems when commuters attempt to gain access to the motorway network.</p> <p>Destructive, costly traffic measures would be necessary in Webheath</p> <p>Do not want Green Lane to become a 'road'</p> <p>Traffic will be forced along unsuitable lanes during frequent times when Bromsgrove Highway is closed due to accidents</p>	<p>A Report was completed by Halcrow (in conjunction with Worcestershire County Council) in 2010 which states what road infrastructure is necessary to support sites in the emerging plan, this includes development at Webheath Strategic Site.</p> <p>In addition the Developers of the site will need to complete site specific transport work in line with Worcestershire County Councils requirements. This work will detail what local infrastructure will be needed if development were to occur on this site.</p>

Road system precludes access to the main areas and facilities of the town except through residential roads which were never built or designed to take the amount of traffic to be generated by this development

The A38 Bromsgrove Road is currently inadequate for the present traffic load in rush hour. The additional traffic generated by the Webheath building will gridlock this road completely. Replacing the single lane road with a dual carriageway will be inadequate.

Foxlydiat Lane is an access to the ADR and this too is a narrow road that cannot take the additional traffic.

Church Road/ Heathfield Road/ Blackstitch Lane junction (painted roundabout) is inadequate to accommodate construction traffic

Webheath is not easily linked up to main roads except for the A448 Bromsgrove carriageway and Bromsgrove is a particular bottle neck for traffic flow in North Worcestershire.

Impact on roads from school in Tynsdale Road.

Increased traffic will impact on A448/A38 roundabout junction at Bromsgrove and Morrisons junction at Winyates

Poor visibility on surrounding roads

To build in the Webheath and Foxlydiat area would mean forcing hundreds more cars onto the Bromsgrove Highway. This often experiences accidents on both sides of the highway, causing long traffic delays and pushing traffic to more local roads in the area. Also

<p>when there are accidents on the M5 or M42 motorway this causes traffic to come off at Bromsgrove meaning long delays on local roads there. It could not cope with the hundreds of cars that the size of these developments would create.</p> <p>Also there will be extra congestion at Headless Cross and Bromsgrove Road leading to the town centre, etc. How will all these people get to the local supermarkets such as Tesco? How will such roads as Green Lane and Crumpfields Lane deal with the traffic; there are many very narrow roads without pavements.</p>	
<p>Norgrove Lane used as preferred route to Droitwich.</p> <p>Blackstitch Lane and Church Road used as a 'rat run' by existing Webheath residents due to congested nature of Heathfield Road</p> <p>Partial hospital closure will force traffic along Norgrove Lane to Worcester A&amp;E</p> <p>Increased traffic will use Crumpfields Lane and Green Lane as short cuts to industrial areas such as Trafford, Evesham and Worcester, lanes are not suitable for any more traffic</p> <p>Many back roads have become commuter rat runs and short cuts between main roads. Foxlydiate lane, Church Road through to Callow Hill and joining up with Windmill Drive is a particular example.</p>	<p>It is not for new development to rectify existing problems. With regard to new development, Worcestershire County Council as Highway Authority for the area will advise any necessary measure that would need to be incorporated in order for development to mitigate any negative effect on surrounding roads. It will be a requirement for the Developers of the site to fund and deliver this infrastructure.</p>
<p>Speeding vehicles along Sillins Lane, Church Road, Foxlydiate Lane, Cur Lane, Blackstitch Lane, Middlepiece Drive, Crumpfields Lane and the lane leading from the Crumpfields Lane turn off down past the Redditch Golf Club</p> <p>Green Lane currently has a safe access into Morton Stanley Park</p>	<p>It is not for new development to rectify existing problems. With regard to new development, Worcestershire County Council as Highway Authority for the area will advise any necessary measure that would need to be incorporated in order for development to mitigate any negative effect on surrounding roads. It will be a requirement for the Developers of the site to fund and deliver this infrastructure.</p>

Claims that the roads will be 'improved' simply translate as 'widened' and this means speeds and traffic volume will increase

Have the Highways or developers done a Risk Assessment about traffic speeds/ volumes

Cars come off A448 too fast and from what I can see only minor adjustments are being undertaken by some additional pavements not alleviating the dangers.

Constant risk of speeding cars, hidden dips and blind summits just crossing the road. Overgrown vegetation on verges creates narrow pathways, lack of speed indicators means that there is no reminder of the 30 mph restriction on Foxlydiate Lane from the moment vehicles enter the road from Birchfield Road to the junction with Church Road.

The Grazing Lane onto Foxlydiate Lane junction was permanently closed on instruction from the police in 2000 (ER 4554823) due to an overrun of accidents. If it is deemed safe to have a junction onto Church Road from the ADR with a greatly increased traffic flow then it must be safe to re-open the Grazing Lane/Foxlydiate Lane junction.

The highway from Foxlydiate to Bromsgrove is also a high accident stretch of road.

Key roads in Webheath do not benefit from modern safer design that encompasses an enhanced understanding of safe road system design. It would be dangerous to increase this danger that is likely to cost a one of our most vulnerable residents their life.

Object that no road safety risk assessments have been completed

<p>As the site is bound by narrow lanes and roads there is no safe exit route which would not endanger the lives of pedestrians and drivers.</p> <p>There is no clear and binding (on the developers) requirement to deliver control and reduction of motorised traffic and traffic speeds into and out of the development.</p> <p>Variously hazardous because of poor sight lines (narrow, twisting, undulating, parked cars)</p>	
<p>Parking congestion along Heathfield Road and at Webheath First School will be exacerbated with increased traffic numbers</p> <p>Blackstitch Lane has additional cars parked on the road when residents cannot get up or down Weatheroak Close because of the ice on the hill.</p>	<p>It is not for new development to rectify existing problems. With regard to new development, Worcestershire County Council as Highway Authority for the area will advise any necessary measure that would need to be incorporated in order for development to mitigate any negative effect on surrounding roads. It will be a requirement for the Developers of the site to fund and deliver this infrastructure; this may include appropriate parking mechanisms.</p>
<p>Transport analysis was not undertaken during 'school run' periods and during an off peak time, thereby underestimating traffic volumes.</p> <p>Evidence submitted by D Rose 'Webheath Highway Infrastructure Audit – 2012' saved in BORLP4 Consultation Reps Supporting Evidence File.</p>	<p>It is assumed this comment is referring to transport work completed by Worcestershire County Council to support the emerging plan. Any traffic counts completed as part of this work were completed in two peak periods AM and PM.</p>
<p>Noise, pollution and danger to pedestrians of 1200 residents cars plus visitors and deliveries using Blackstitch Lane and Heathfield Road is unacceptable and unsustainable</p> <p>Additional roads will damage the local environment and area.</p>	<p>Worcestershire County Council Highways Authority and the Borough Council Environmental Health Department would be consulted as part of any planning application.</p>
<p>Question whether there be traffic calming measures, particularly as traffic calming is discussed for the Taylor Wimpy site</p>	<p>It is not for new development to rectify existing problems. With regard to new development, Worcestershire County Council as Highway Authority for the area will advise any necessary measure that would need to be incorporated in order for development to mitigate any negative effect on surrounding roads. It will be a requirement for the</p>



	Developers of the site to fund and deliver this infrastructure; this may include appropriate traffic calming measures.
<p>Road surfaces are visibly damaged as a result of the current volume of traffic, including heavy goods vehicles which will inevitably increase if building work were undertaken over several years</p> <p>Due to the heavy goods vehicles that the roads experience, roads are visibly damaged with potholes and uneven tarmac. This will only get worse if building work goes ahead. Roads will only be improved by “widening”, which in-turn allows for higher volume in traffic and speed.</p> <p>Concern regarding the condition of the road surfaces leading out of Webheath into the countryside. They are pot-holed and dangerous, with the tarmac at the roadside eroded. This has become worse year on year, with temporary quick-fix repairs only, and again, I think this would become more of an issue with more vehicles using these routes – and they undoubtedly would with the extra houses being proposed.</p>	<p>It is not for new development to rectify existing problems. With regard to new development, Worcestershire County Council as Highway Authority for the area will advise any necessary measure that would need to be incorporated in order for development to mitigate any negative effect on surrounding roads. It will be a requirement for the Developers of the site to fund and deliver this infrastructure; this may include enhancements to current road surfaces.</p>
<p>More housing will encourage more cars which was not the intention of the plan.</p>	<p>Although it is accepted that the intention of the plan is not to increase car usage it is also acknowledged that by delivering the required amount of housing car usage may rise. However the emerging plan also contains transport policies which seek to ensure a modal shift from private car use to public transport can occur. This is supported by other initiatives being conducted in the town such as ‘Choose How You Move’ which seeks to increase the usage of sustainable modes of travel.</p>
<p>Congestion at Downsell Road and Springvale Road at school times</p> <p>Development to the M42 may well travel along B4184 Windsor Road and choke already busy road altogether.</p>	<p>It is not for new development to rectify existing problems. With regard to new development, Worcestershire County Council as Highway Authority for the area will advise any necessary measure that would need to be incorporated in order for development to mitigate any negative effect on surrounding roads. It will be a requirement for the</p>

<p>The rush traffic hour traffic from the proposed Webheath</p> <p>The impact of traffic on Headless Cross Centre. I understand no traffic impact assessment has been carried out. The area is already grid locked many times during the day. You cannot stop those from any new development using this route to go to Tesco etc.</p> <p>There are already queues at the mini roundabout at the end of my road from Church road to Heathfield road each morning and evening, as such the large volume of new traffic which would use this link to access the dual carriageway during rush hour is a major concern to me.</p>	<p>Developers of the site to fund and deliver this infrastructure; this may include appropriate congestion mechanisms.</p>
<p>Employment opportunities within Redditch are limited and therefore the majority of traffic will be commuter.</p>	<p>The emerging plan allocates an amount of employment land required up to 2030, this is allocated in the most suitable and sustainable location. Webheath Strategic Site is not considered to be a suitable location for employment. It is acknowledged that by delivering the required amount of housing car usage may rise. However the emerging plan also contains transport policies which seek to ensure a modal shift from private car use to public transport can occur. This is supported by other initiatives being conducted in the town such as 'Choose How You Move' which seeks to increase the usage of sustainable modes of travel.</p>
<p>There is mention of £3,660 to be paid for Traffic Regulation Order (TRO) but this may or may not be paid.</p>	<p>It is not clear where this reference is contained, this is not part of the emerging plan. Any necessary TRO would be a requirement for Worcestershire County Council and would be required through any planning application.</p>
<p>The area would benefit from improvements to local roads.</p>	<p>Noted.</p>
<p>The area is ideally situated between Redditch and Bromsgrove with quick access either direction on the A448. The area offers opportunity to revitalise the Town Centres.</p>	<p>Noted.</p>

KEY ISSUE: Transportation – Walking, cycling and horse riding

Sub Issues	Officer response
<p>Speeding traffic dangerous for walkers, cyclists and equestrians</p> <p>Increased safety risk for children walking to school and OAPs using the local grocery store</p>	<p>It is not for new development to rectify existing problems. With regard to new development, Worcestershire County Council as Highway Authority for the area will advise any necessary measure that would need to be incorporated in order for development to mitigate any negative safety effect on surrounding roads. It will be a requirement for the Developers of the site to fund and deliver this infrastructure.</p>
<p>Many roads lack pavements for pedestrians (Church Road, when approaching from Heathfield Road and Foxlydiate Lane) see WAG Highway Infrastructure Audit Map (2012)</p>	<p>It is not for new development to rectify existing problems. With regard to new development, Worcestershire County Council as Highway Authority for the area will advise any necessary measure that would need to be incorporated in order for development to mitigate any negative safety effect on surrounding roads. It will be a requirement for the Developers of the site to fund and deliver this infrastructure.</p>
<p>Question how there will be safe access to the children's play area on Blackstitch Lane</p>	<p>Access to the play area on Blackstitch Lane will remain unaltered.</p>
<p>What provision will be made for horse riders if bridleways are removed</p> <p>Plans show an intention to build on two of the bridleways in Webheath; one located through Curr lane and another in Local Plan 4.</p> <p>Where will the bridleways be located to?</p>	<p>Reference to the Bridleway is contained within the Policy and this track should be retained as part of the Green Infrastructure within the site.</p>
<p>National Cycle Route 5 passes through the area, and is clearly signposted on quiet lanes once Church Road is reached. There are no clear proposals for the handling of route 5 which will be impacted by both the development from Redditch Local Plan 4 and the proposed Site 1. Increased cycle use is key to the provision of sustainable transport proposed in the development plan, yet there is no clear explanation as to how this will be achieved for cyclists. The national cycle facility deteriorates markedly once into the more urban</p>	<p>National Cycle Route 5 does not pass through the site. It does run adjacent down Pumphouse Lane. Cycle routes will be required as part of the development. Cycling is also permitted on the Bridleway which should be incorporated into the Green Infrastructure network on the site.</p> <p>Sustainable travel is one of the priorities for the merging plan and therefore developments should not have a negative impact on existing</p>

<p>parts of Redditch, concern over future for this route in spite of the “promise” of sustainable transport provision.</p> <p>Pumphouse Lane has a national cycle route.</p>	<p>routes.</p>
<p>Developers to fund the preservation and maintenance of existing footpaths and ancient routes (e.g. the Monarch’s Way) for a period of 10 years following the commencement of development at the site.</p> <p>Developers should fund the provision, upgrade to existing facilities and signposting and maintenance of cycle route 5 across Redditch for a minimum of 10 years following commencement of development at the site.</p> <p>Developers to fund and maintain the improvement of the roadways within the development, and connecting the development to wider Redditch in such a way that: walking and cycling is promoted by the provision of “dutch-style” protected combined cycle and walking routes alongside the roadways. This for a minimum of 10 years following the commencement of development.</p>	<p>The timescales for maintenance plans will be negotiated with the developer at the application stage.</p>
<p>The Thatchers 2012/251/FUL given planning permission. Therefore full consideration of the amount of traffic and pedestrians from the new development has not been fully explored. See traffic in and out of development below Revised Travel Plan 2013.</p> <p>From the information provided by Taylor Wimpey it appears that Worcestershire County Council have stated that if there isn’t room to put in a pavement/footway up towards the brow of the hill and afterwards “this will not present a problem”</p> <p>Consideration regarding no pavement area in Church Road needs to be given to disabled people, pedestrians in wheelchairs, people with pushchairs, children and walkers all going up to the brow of the hill towards Heathfield Road to post office and shops etc.</p>	<p>Any planning application would need to take into account existing transport data in order to plan correctly to manage the effects of new development. The Plan seeks to ensure that pedestrian links are retained and enhanced. However site specific details regarding design would be subject to consultation with Worcestershire County Council at application stage.</p>

<p>Will you be building pavements for the safety of pedestrians, cyclists, joggers and dog walkers etc</p> <p>Concern for Arrow Valley Runners who meet at Morton Stanley Park on a regular basis and head out along the country roads through Webheath and beyond.</p> <p>Concern for future of 10 public countryside way walks (Used daily for exercise and by dog walkers) 2 bridleways (The only 2 left in Webheath/Foxlydiate. Used regularly/daily)</p>	
<p>Walking distances are far from acceptable for most people, particularly children and the elderly where public transport is essential.</p> <p>Town Centre is not within walking distance from Webheath with little shopping and no bus service</p>	<p>The developers will be required to ensure that walking distances to services and public transport is appropriate. The emerging plan also requires every dwelling to be within 250m of a bus stop.</p>
<p>There is no clear and binding (on the developers) requirement to deliver traffic free, signposted cycle routes, into and out of the development.</p> <p>There is no clear and binding (on the developers) requirement to deliver pedestrian access into and out of the development.</p>	<p>Worcestershire County Council Highways Department will be consulted as part of any planning application and it will be for the developer to deliver safe and convenient access routes in and out of the development.</p>
<p>The area represents a point of accessibility of the countryside. Someone living in the Town Centre or Batchley who wishes to go out by bicycle will almost certainly look to the South West. To get to that area there are the following access points-</p> <p>Evesham Road (very busy) Blaze Lane Callow Hill Lane (sometimes busy) Back end of Morton Stanley Park</p>	<p>Anyone wishing to travel by bicycle would still be able to access these roads; in addition the development on site will incorporate cycle routes which can be accessed by all residents of the town.</p>

<p>Crumpfields Lane Pumphouse Lane</p> <p>If the development on Webheath ADR goes ahead it firstly moves the countryside a mile further away</p>	
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## KEY ISSUE – Phasing

<b>Sub Issues</b>	<b>Officer response</b>
<p>Support (in part) the allocation of the Webheath Strategic Site for between 400 to 600 dwellings. We object to the phasing policy which seeks to deliver 200 dwellings within 5 years from the adoption date of the local Plan with the balance (200-400 units) to be delivered as a second phase approximately 10 years from the adoption date. The first phase is the subject of a current planning application by Barratt and Taylor Wimpey. We would expect both developers, working from 2 sales outlets, to build out a scheme of 200 units within a period of 3 years. The policy as drafted therefore anticipates a vacuum in the build programme of many years which will be an unnecessary delay. Policy 48 should encourage the rest of the ADR land to come forward for development as soon as possible to be consistent with Policy 3 of the Local Plan. The residual area can be planned for independently of the part which is the subject of a current planning application. The Council should work with the remaining landowners to facilitate the preparation of a planning application on the rest of the ADR site.</p>	<p>Delivery trajectories are based on information that is available at the time. The second phase of this site can come forward early on in the plan period and the Council has attempted to facilitate discussions to make this happen, however the Borough Council have not received any information from agents or landowners which demonstrate this is likely to be the case.</p>
<p>The Local Authorities should obtain their own special reports not rely upon the Applicant's reports.</p>	<p>The evidence base for the emerging plan is made up of studies which have been commissioned independently by the Borough Council. Any work completed by the developer can be utilised for information purposes but does not directly form any part of the evidence base.</p>
<p>This area offers good scope for meeting housing need of the area.</p>	<p>Noted.</p>
<p>Webheath has already been overdeveloped.</p>	<p>Any development previously permitted in Webheath would have been considered in line with the planning framework at the time.</p>

Barratt West Midlands and Taylor Wimpey UK Ltd also have an on-going interest in the wider-ADR site that could assist in the Council in meeting a significant proportion of their overall housing requirement in a sustainable location adjacent to the existing built area of Redditch. Importantly the application for Phase 1 has been designed in such a way as to ensure that the future delivery of Phase 2 is deliverable.	Noted.
An outline planning application is already under consideration and has been recommended for approval to deliver up to 200 dwellings (Phase 1) of the Webheath ADR. The remainder of the site (Phase 2) is expected to have a similar capacity to Phase 1. The timeframe for the delivery of the second phase of development is not currently known, however, subject to wider economic conditions and the development of Phase 1 it is conceivable that the site could be delivered within the first 5 years after the adoption of the Local Plan, contrary to the comment at the bottom of the second paragraph.	It is accepted that delivery of Phase 2 of the site could be delivered within five years however the Council has not received any information to this effect, therefore a realistic assumption regarding timeframes for delivery has been made.
Your Council should be happy that infrastructure requirements can be delivered within a phasing timescale in consultation with Severn Trent Water.	The Council are working with STWL to ensure that infrastructure can be delivered to support delivery of the strategic site.

## KEY ISSUE: Miscellaneous

<b>Sub Issues</b>	<b>Officer response</b>
<p>Webheath is a village</p> <p>Development proposed doubling the size of Webheath, from a village to a town.</p>	<p>In a planning sense, there are no definitions of towns or villages - in terms of planning policy and identifying 'places' then planning usually refer to settlements. Therefore, Webheath has no particular status, either now or in the past, in terms of whether it is a suburb or a separate village.</p> <p>In adopted Local Plan No.3, and in the emerging Local Plan, Webheath is included as part of the town of Redditch and as such is recognised as part of the urban area. From a policy perspective, the</p>

	distinctions are urban, greenbelt and countryside. The latter two are generally protected through planning policies (subject to various exceptions criteria). Whilst urban areas which are generally more sustainable and better served by community facilities and employment opportunities are usually the areas where further development is to be directed.
Building this development will create noise, traffic and major disruption	It is accepted that construction of new development may cause a degree of disturbance during the construction phases. Conditions can be placed on a planning application to restrict this.
The development will be seen for miles as the land to the south west drops away	The policy states that “ <i>topography of the site should be respected</i> ”. Therefore any planning application must implement this criterion which should reduce the visual impact of the development.
Change Webheath ADR back to Green Belt land and not build upon it	Webheath ADR was never designated as Green Belt; its first designation was to an ADR through Local Plan No.2 in 1996.
WYG2 stated that Webheath ADR is unsuitable for future development  Why does Webheath now meet the criteria for development having been rejected by inspectors previously?	This Study’s recommendations were considered by WMRSS Phase 2 examination and not considered sufficiently robust to support a designation. At no point has Webheath Strategic Site being rejected by any Inspector.
Development will lower the tone and value of neighbouring properties  I do not want our home to be devalued any more that the current economic climate had done  Property on Defford and Blockey Close paid high prices for their houses to situated close to the beautiful countryside, with many houses positioned to maximise those views will council going the compensate for devaluation of properties  Houses to be built will eradicate the social value of the land to current and future residents.	Property value is not a material planning consideration.



Council houses should not be built near private houses.	
Taylor Wimpey (application to build upon the Webheath ADR) have obviously delayed their amendments until this time for maximum effect. No doubt in close collaboration with the Local Plan consultation, or else they would have submitted months ago.	The timing of planning applications is not a matter for the Local Plan process. Applicants can submit planning applications whenever they wish. They will be determined in accordance with the planning policy framework in place at the time, with consideration of the emerging plan as a material consideration with limited weight.
Object to development in Webheath. Development in Webheath is unsustainable	Webheath Strategic Site is considered to be a sustainable and suitable place to build in order to contribute towards meeting Redditch's housing requirements.
If housing is built in the area the Town Centre should be vibrant.	The emerging Local Plan No.4 contains Policies to enhance and regenerate the Town Centre over the life of the plan.
How could the proposed development not be considered 'urban sprawl'?	The Strategic Site has clear Green Belt boundaries in place which have the potential to be further defined through development. The purpose of the plan is to allocate enough land for the plan period, therefore applications outside of these designated areas will be considered on their own merit.
Definition of ADR indicates restraint from development. It is therefore not possible for development of any kind and by anyone on any ADR site if such a site exists and is so designated by a law or a directive by a law. To develop an ADR is lawless.	The Glossary within the Draft Local Plan No.4 defines Area of Development Restraints as " <i>An area of land safeguarded for consideration for possible long-term development needs. These areas were excluded from the Green Belt in previous Local Plans</i> ". If these sites are considered suitable for development to meet housing need and are designated as such in an adopted plan it would be contrary to policy to develop these areas.
Redditch is a New Town and is well known for the town being set inside a beautiful green belt with easy access to motorways etc, why spoil it?	It is necessary to meet the Boroughs objectively assessed housing needs. To do this areas of land are needed to meet housing requirements and the former ADR site is more preferable than Green Belt sites.
Redditch town centre is not in the centre and that the town is already lop-sided. If the houses were built in Webheath and Foxlydiate the town would be hugely lopsided, however if houses were built in Bordesley it would put Redditch Town centre more central.	This is typical of many towns. The selection of sites for development is based on a number of factors including accessibility to the Town Centre. The Town Centre can be accessible without being centrally located to all development.
The conclusions of the White Young Green report 2009,	Firstly, the WYG report was commissioned by the Council's, not just

<p>commissioned by the W. M. Regional Assembly, should be followed in that the Webheath ADR is unsuitable for future development and return to Green Belt. A quotation from that report is:</p> <p><i>'This is an undulating area of land of, in our opinion, high landscape value containing pasture land with mature hedgerows and trees of individual quality. The landform of the site integrates the site in to the open countryside to the west with twin valleys running south-west to north-east. Any development would in our view be intrusive and poorly related to the existing developed areas... the road network in the area is poor... Accessibility to public transport, the town centre and main employment sites is poor. For these reasons we are of the opinion that the Webheath ADR should not be developed and would more properly be treated as an extension to the neighboring Green Belt.'</i> (WYG 2009, p 23 &amp; 24)</p>	<p>WMRA. This study was largely discredited by the WMRSS Panel Report recommendations, therefore it is not considered to be robust enough to stand up to scrutiny. Therefore it has been necessary to reconsider all of the sites considered in this study.</p>
<p>Support for Webheath as a Strategic Site for plan period.</p> <p>The site has been identified as suitable for residential development and that following detailed considerations of the sustainability of the proposal the development will result in significant benefits to the Borough.</p> <p>It has been demonstrated that following appropriate levels of mitigation and contributions the development would not lead to detrimental effects on traffic flows or highway safety.</p>	<p>Noted.</p>
<p>It is apparent that significant parts of this policy covers matters that are dealt with in other policies within the draft Local Plan No. 4 or are standard planning practice and it is important that onerous requirements aren't included within the Local Plan that impact only on the strategic allocations; sites which the Council acknowledges are required to deliver early in the plan period to assist in meeting housing needs.</p>	<p>It is considered that some the requirements contained within the general polices within Local Plan are locally distinctive to the Strategic Sites and therefore require repeating within these polices.</p>

<p>The local planning authority has failed to provide a robust evidence base for the development of land at Webheath, which is currently an Area of Development Restraint (ADR) and covered by extant Local Plan (3) Policy B (RA).3. The draft plan fails to take proper account of the evidence base and does not constitute a proper review of existing policy B (RA).3.</p>	<p>The evidence base supporting the designation of Webheath as a Strategic Site is considered to be robust, with exceptional circumstances to demonstrate the need for land to meet housing need without requiring Green Belt land for this development. The emerging Local Plan No.4 will replace Policy B (RA).3 'Area of Development Restraint'.</p>
<p>Policy 48 of the draft plan is not sound, for two reasons:</p> <ul style="list-style-type: none"> <li>• It does not conform to the requirements of NPPF</li> <li>• It is not justified by being demonstrably the most appropriate strategy, when considered against the reasonable alternatives, or based on proportionate evidence.</li> </ul>	<p>It is considered that the Policy does conform to the requirements of NPPF and is considered to be a suitable location for future housing after considering the alternatives; this is set out in the accompanying sustainability appraisal.</p>
<p>The draft policy fails to make any reference to the imperative in the NPPF to review the ADR's status or, more particularly, to the advice given by WYG. Furthermore, it provides no new objective evidence to justify the site's allocation. The whole approach to the Webheath ADR conflicts with the principles of paragraphs 14 and 85 of the NPPF and, consequently, they are unsound.</p>	<p>It is considered that the Policy does conform to the requirements of NPPF. A full review of the ADRs has been completed and their suitability to meet housing need has been assessed, see the sustainability appraisal.</p> <p>With regard to WYG, this Study's recommendations were considered by WMRSS Phase 2 examination and not considered sufficiently robust to support a designation.</p>
<p>Like the NPPF (paragraph 85), Local Plan 3 is very clear that it would be entirely wrong for the authority to assume that, simply because the site was identified as ADR and we are now beyond 2011, it is now able to be allocated for development with no further review. In the absence of any evidence to demonstrate otherwise, there would be no reason to review policy B(RA).3. No such evidence has been brought forward, yet the authority has done precisely what B(RA)3 said it should not do, with the consequence that the authority's approach is contrary both to the principles of the NPPF para 85 and to the commitments made - not least to local residents – in B(RA)3 that the policy did not imply a presumption in favour of development.</p>	<p>Policy B(RA).3 Areas of Development Restraints states that "<i>ADR will be safeguarded to meet possible longer term development requirements beyond the year 2011.</i>" Therefore the Policy is quite clear that after 2011 the ADR land may be suitable for development.</p> <p>The Reasoned Justification then goes on to say that "<i>The identification of an ADR does not necessarily imply that it will be allocated for development purposes when the plan is next reviewed ...</i>" The Local Plan has been reviewed through the preparation of Draft Local Plan No.4 and this land is considered to be suitable to meet housing needs.</p>
<p>Following the review of Local Plan No 3, the Inspector made the following conclusions in terms of the site at Webheath (para 5.60):</p>	<p>It was not necessary for the Inspector of Local Plan No.3 to consider the suitability of the ADR as this site was not being proposed for</p>

<p><i>“The concerns relating specifically to the Webheath ADR do not need to be addressed by me as there is no development proposed in that area of the Plan, and I do not propose to disturb that approach (c).”</i></p> <p>In the light of comments made by the local planning authority elsewhere (in the HGDS) it is important to note that the Inspector specifically stated that he had not considered any of the detailed matters relating to the ADR.</p>	<p>housing at the time. The Policy B(RA).3 Areas of Development Restraints states that <i>“ADR will be safeguarded to meet possible longer term development requirements beyond the year 2011.”</i></p> <p>Therefore the Policy is quite clear that after 2011 the ADR land may be suitable for development. A full review of the ADRs has been completed and their suitability to meet housing need has been assessed, see the sustainability appraisal.</p>
<p>A response to each of the sixteen numeric bullet points of Policy is provided below:</p> <p>i - The broader housing policies are sufficient to determine house types across all developments and there is no clear justification for setting a specific house type requirement for strategic sites. The site is not unique in being able to provide single bedroom dwellings but matters such as this can be dealt with through pre-application discussions with the Council;</p> <p>ii – Standard design comment that would be dealt with at the planning application stage. Also covered by Policy 40 (High Quality and Safe Design);</p> <p>iii - Standard design comment that would be dealt with at the planning application stage;</p> <p>iv – Standard design comment that would be dealt with at the planning application stage. Also covered by Policy 40 (High Quality and Safe Design);</p>	<p>Each Strategic Site is unique in its characteristics. It is considered that based on the area and the sites constraints and the design requirements of the site, bungalows and/ or 1 bedroom flats/ maisonettes would be appropriate in this area. However it is accepted that detailed discussion regarding housing types and size would be discussed at pre-application stage.</p> <p>Although in principle this is correct it is essential that this whole site is designed to improve the character and quality of the Webheath area and therefore this point is considered essential to remain within this policy and is appropriate for other parts of the Strategic Site in future phases.</p> <p>The open character of this site is unique to this site and therefore it is essential that development of the site is sympathetic to this.</p> <p>This site should be designed to maximise views in and out and these views should be incorporated, this need is unique to this site and this point should be retained.</p> <p>Noted.</p>

<p>v – The topography of the site will be respected in the design of the site, whilst providing suitable development platforms within the site on which to deliver the new dwellings and associated infrastructure;</p> <p>vi – Green Infrastructure requirements are covered under Policy 11 of the draft Local Plan;</p> <p>vii – the precise mix of planting and landscaping on the site would be agreed through any planning application following consultation with all of the relevant Council departments in order to maximise future biodiversity within the site;</p> <p>viii – Ecological and Archaeological surveys would be submitted where appropriate as per the planning application validation checklist;</p> <p>ix – Worcestershire County Council would provide comment on modal choice and required infrastructure contributions as part of any planning application on the site;</p> <p>x – Matters relating to pedestrian movement and cycling are dealt with through Policy 19 (Sustainable Travel and Accessibility) and detailed design of such provision would be dealt with through planning applications on the site;</p> <p>xi – Policy 16 (Natural Environment) provides guidance on enhancing biodiversity within development proposals and sets out the relevant</p>	<p>This point should be retained as it makes specific reference to the Green Infrastructure Concept Statement for Webheath; this is unique to this site.</p> <p>Noted. This point makes specific reference to distinctive features of the site which should be incorporated into site design. This will also be required throughout the Strategic Site where land ownerships are more fragmented.</p> <p>The Validation Checklist is subject to change; however the ecological and archaeological aspects of this site are important and should be incorporated into site design. Therefore for this reason it is important to retain this requirement.</p> <p>Agreed, however it is essential that this site is accessible by a range of modes of transport and appropriate infrastructure is delivered to support site development. Therefore it is important for this point to remain. It is also important considering different land ownerships throughout the Strategic Site.</p> <p>Agreed, however it is essential that this site is accessible by a walking and cycling. Therefore it is important for this point to remain.</p> <p>Agreed, however the provision of biodiversity enhancements is important to ensure this site is sustainable, therefore it is important for this point to remain.</p>
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<p>guidance;</p> <p>xii – A Flood Risk Assessment would be provided as part of the validation requirements of a planning application and Policy 17 (Flood Risk) provides guidance on this matter;</p> <p>xiii – Under the Water Industry Act (1991), developers have a right to connect foul and surface water flows from new developments to public sewers, furthermore, the Act places a general duty on sewerage undertakers, including Severn Trent Water, to provide the additional capacity that may be required to accommodate additional flows and loads arising from new domestic development. Therefore there are already measures in place through which to secure the appropriate drainage infrastructure;</p> <p>xiv – Incorporation of SuDS into a development scheme is covered in Policies 17 (Flood Risk) and 18 (Sustainable Water Management);</p> <p>xv – Infrastructure requirements that are robust, in that they are proportionate to the development and directly to the scheme, will be captured through a S106 agreement and/or CIL should the Council proceed down that route. The phasing of such infrastructure would be agreed at the planning application stage; and</p> <p>xvi - Standard design comment that would be dealt with at the planning application stage. Policy 8 is related to the Green Belt and should the Council seek defensible boundaries on all new developments adjacent to the Green Belt then this would be a more appropriate location for such guidance.</p>	<p>The Validation Checklist is subject to change; however flood risk is important and should be incorporated into site design. Therefore for this reason it is important to retain this requirement.</p> <p>Agreed. However, it is essential that this is considered early on in the design process for this site and that engagement is sought with the relevant stakeholders at the earliest opportunity to ensure sustainable delivery of this infrastructure as there are a number of options to deal with wastewater for this site. This is also a site closely related to the potential cross boundary site at Foxlydiate, and drainage infrastructure linked between the sites will be an important consideration.</p> <p>SuDS are essential for this particular site due to its current greenfield status therefore this is particularly relevant here.</p> <p>Agreed, for this site it is important that the infrastructure is consider for the whole site, which may influence delivery timetables. Therefore it is essential that this point remains to ensure this infrastructure is delivered sustainably.</p> <p>This point makes reference to the need for enhancements along the south and south west of the site, this is unique to this site and therefore the appropriate location for this particular requirement.</p>
<p>The 2011 and the 2012 SHLAA – (reference 2010/04 and 2010/12)</p>	<p>The Local Plan Review has been conducted through the preparation</p>

<p>both make reference to the site as follows: “<i>Site needs specific FRA and mitigation measures and drainage assessments. There are also on-going contentious issues surrounding development of this site. Furthermore, at this point in time, reliance on this site to meet development needs in this plan period is unclear. Furthermore, emerging NPPF (2011 - para 140, 2012 – para 85) states that planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposes the development.</i>” The 2011 and the 2012 SHLAA stated that a local plan review would need to take place, prior to considering ADR sites for future development. It does not, as is claimed by the local planning authority elsewhere, identify the site as suitable for early development.</p>	<p>of Local Plan No.4. This process has deemed this site to be suitable to for meeting some of the housing need.</p>
<p>Two key documents that form part of the local planning authorities’ evidence base consist of the ‘Joint Study into the Future Growth Implications of Redditch Town to 2026’ (2007, WYG) and the ‘Study into Future Growth Implications of Redditch – Second Stage Report’ (2009, WYG).</p> <p>The local planning authority has entirely ignored the recommendations, and even the evidence, provided by the two WYG studies. At paragraph 6.01, the first study restates the now-familiar principle that ADRs cannot be released until a proper review has taken place: “<i>The Borough of Redditch Local Plan No.3 contains three Areas of Development Restraint at Webheath, Brockhill and along the line of the abandoned improvements to the A435. These sites have been identified as having long-term potential to meet the needs of the town and whilst they cannot be released until the matter has been properly considered at a future review of the Development Plan they have been excluded from the Green Belt.</i>”</p>	<p>WYG 1 did not consider the suitability of the site for development but considered the strengths and weaknesses of each larger site around Redditch. The reference to WYG1 and the status of ADR being reviewed through the Development Plan was necessary, because this evidence was being collected for the purpose of the WMRSS evidence base on Redditch growth, rather than being part of a Development Plan review.</p> <p>WYG 2 recommended that Webheath ADR should be designated as Green Belt; however WYG2 was largely discredited by the WMRSS Panel Report recommendations and therefore is not considered robust as evidence to the emerging plan.</p> <p>The suitability of the Webheath ADR has been considered through the emerging Local Plan process. This process has determined that the area is suitable to accommodate a portion of housing and evidence exists to support the allocation of this site for housing development.</p>

The second WYG study (2009) specifically assesses the suitability for development of the land at Webheath site (paragraph 5.04): *“This is an undulating area of land of, in our opinion, high landscape value containing pasture land with mature hedgerows and trees of individual quality. The landform of the site integrates the site in to the open countryside to the west with twin valleys running south-west to north-east. Any development would in our view be intrusive and poorly related to the existing developed areas.”* Paragraph 5.06 states the following: *“Accessibility to public transport, the town centre and main employment sites is poor. For these reasons we are of the opinion that the Webheath ADR should not be developed and would more properly be treated as an extension to the neighbouring Green Belt.”*

Figure 1 below shows the topography of the Webheath site. The WYG (second stage) study included this illustration within their study in order to demonstrate the importance of the landscape. The second stage study failed to identify any significant benefits of developing the Webheath site, aside from it being a designated ADR and not situated within the Green Belt. However, it identified a very clear list of disadvantages of any future development at the site, including the following:

- Development would be visually intrusive;
- Webheath is a ‘highly visually sensitive area’;
- Principle timbered farmlands
- Landscape of good condition
- Difficult foul drainage
- Distance from employment sites

The findings and recommendations above make it clear that, in WYG’s professional and objective assessment, the Webheath ADR is not the most suitable site for development. WYG recommended that



land at Bordesley Park, Brockhill and Foxlydiate is sequentially preferable to the Webheath site and should be considered for accommodating future development ahead of the Webheath site. The draft Local Plan has failed entirely to acknowledge this advice and therefore, it fails to adequately justify why the Webheath ADR is being proposed for development. In doing so, the draft Local Plan fails to comply with paragraphs 14, 30, 85 and 182 of NPPF. It is essential that Local Plans and policies are 'Justified' in order for them to be found sound by an Inspector. They must demonstrate the most appropriate strategy when considered against the reasonable alternatives. This, patently, has not happened in this case. In the course of proposing to allocate the Webheath site for development, the local planning authority has not demonstrated that all other options/alternative mix of sites have been considered. In particular, the local planning authority has not dealt with the clear conclusion that, of the broad locations shortlisted within the WYG second stage report, the Webheath site should not be considered to be a preferable alternative. The local planning authority should be considering alternative sites ahead of the Webheath ADR. The Webheath ADR has not been subject to the same rigorous assessment as the other sites and without such an assessment, the Inspector is extremely poorly informed as to the basis for including Webheath as a strategic development site. In not doing so, the local planning authority has ignored entirely the objective evidence and recommendations within the WYG second stage report, which the local planning authority itself lists as forming part of the evidence base for the draft Local Plan. Coincident with WAG's submission, the recommendations of the WYG report indicate that development should take place elsewhere rather than Webheath.

<p>Policy 67 of the consultation draft Core Strategy (2011), following consideration of the WYG studies, the local planning authority set out the case that the Webheath ADR was not to be brought forward in the foreseeable future: <i>“In order to plan and provide for future development demands, certain lands within Redditch Borough at the edge of Redditch’s urban area are identified as Areas of Development Restraint (ADR); namely A435 ADR and Webheath ADR.</i></p> <p><i>ADRs will be safeguarded to meet longer term development needs beyond 2026, subject to a reassessment of the ADR’s suitability to deliver appropriate development and its associated infrastructure at that time. This could ensure at least 15 years of continuous housing delivery required by PPS3 – Housing. In the interim, development proposals on ADR land will be subject to policies controlling development in the Open Countryside.”</i></p> <p>No further evidence has been adduced by the local planning authority to justify the policy U-turn that has resulted in the inclusion of the Webheath land in the current draft Local Plan. In looking for the local planning authority’s justification for this U-turn, in the companion report, the Housing Growth Development Strategy (HGDS), the local planning authority makes the following statements: <i>“The principle of future development on the ADR was therefore tested at the public inquiry into the Local Plan. In addition, the ADR site has been assessed within the Redditch SHLAA and is considered to be suitable, available and capable of delivering housing within the plan period. On this basis no further assessment of this particular ADR parcel within the site is required in this study as it already forms part of the housing capacity identified within Redditch Borough.”</i></p>	<p>Since the Consultation in 2011 the plan process has moved on and further evidence suggests that the housing requirement for Redditch should be 6,380 dwellings between 2011 and 2030. Land must be identified which accommodates this housing need. The suitability of the Webheath ADR has been considered through the emerging Local Plan process and based upon the evidence to suggest that there are no reasons why the site cannot be developed sustainably.</p> <p>Where sites are capable of being developed they should contribute towards meeting the objectively assessed housing requirements for Redditch. This process has determined that the area is suitable to accommodate a portion of housing and that evidence exists to support the allocation of this site for housing development.</p> <p>It was not necessary for the Inspector of Local Plan No.3 to consider the suitability of the ADR for housing development as this site was not being put forward as an allocation at this point. A review of the suitability of the site for development has been completed in the preparation of Draft Local Plan No.4.</p>
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<p>All of the assertions contained in this statement are incorrect and misleading:</p> <ul style="list-style-type: none"> <li>• The principle of future development was not tested at the Local Plan 3 Inquiry. On the contrary, as we have shown above by the Inspector there explicitly noted that it had not been tested.</li> <li>• The Redditch SHLAA does not say what the local planning authority claims. On the contrary, it makes it clear that a review is needed through Local Plan 4 before the land can be considered. As can be seen from the first bullet point, the local planning authority has, explicitly, not carried out that review.</li> <li>• The land may well already have been included in the housing capacity identified within Redditch Borough council, but that has been done with flagrant disregard for Local Plan 3, the SHLAA and the NPPF, all of which require explicit review through the Local Plan 4 process before such reliance can be placed on the land.</li> </ul>	
<p>As part of the evidence put before the Inspector, the local planning authority must demonstrate:</p> <ul style="list-style-type: none"> <li>• That a review of the land's suitability has been carried out, in the light of current, up to date, policy and evidence</li> <li>• That the review has been carried out assessing each of the available options on a 'level playing field' with the other available sites, so that the local planning authority can demonstrate that it is the most sustainable and deliverable option available. It is patently evident from the local planning authority's own documentation that none of this work has been carried out.</li> <li>• The inclusion of the ADR as a Strategic site is based on no robust and credible evidence – rather it is based on misinformation and assertion.</li> <li>• There is no evidential basis whatsoever for concluding that the inclusion of the ADR as a Strategic Development Site is "<i>The most</i></li> </ul>	<p>A review of the suitability of the site for development has been completed in the preparation of Draft Local Plan No.4. The evidence base in place demonstrates that is land is suitable for accommodating future housing development.</p> <p>It is not clear from the respondent which aspects of the evidence base are based on 'misinformation and assertion'.</p> <p>This site has been considered as being suitable as a Strategic Site allocation. Which regard to the 'appropriate strategy when considered against the reasonable alternatives', this refers to the housing strategy contained within the emerging Local Plan No.4, which is considered to be the most appropriate and suitable strategy.</p>

<i>appropriate strategy when considered against the reasonable alternatives.”</i>	
<p>The proposal to include the Webheath ADR land as a Strategic site within the Local Plan has not followed the requirements of NPPF, Local Plan 3 or the objective evidence. The allocation of the land is premature and, being contrary to the NPPF and based on no objective evidence, is unsound. The whole suite of Housing location policies for Local Plan 4 could be found to be unsound - there is simply no evidence to show that the strategy is the most appropriate, that is it sustainable or that it is based on robust and credible evidence.</p> <p>Seek the removal of policy 48 and the removal of references to the Webheath ADR as a Strategic Development site. Since its inclusion has not been justified, as it currently stands, the policy is unsound. We also seek a full and objective assessment of the Strategic choices for housing development within the Borough, bearing in mind the duty to cooperate with all of the authorities within the Strategic Housing Market Area. The ADRs should, clearly, be included within this review because that is what Local Plan 3 promised the citizens of Redditch and what the NPPF requires. However, the review should objectively assess the ADRs as part of the whole Housing strategy and within the framework of appropriateness and sustainability required by the NPPF.</p>	<p>It is considered that the Policy does conform to the requirements of NPPF. A full review of the ADRs has been completed and their suitability to meet housing need has been assessed, see the sustainability appraisal.</p> <p>Since the Consultation in 2011 the plan process has moved on and further evidence suggests that the housing requirement for Redditch should be 6,380 dwellings between 2011 and 2030. Land must be identified which accommodates this housing need. The suitability of the Webheath ADR has been considered through the emerging Local Plan process and based upon the evidence to suggest that there are no reasons why the site cannot be developed sustainably.</p> <p>Where sites are capable of being developed they should contribute towards meeting the objectively assessed housing requirements for Redditch. This process has determined that the area is suitable to accommodate a portion of housing and that evidence exists to support the allocation of this site for housing development.</p>
Significant costs are involved in developing the ADR.	Costs associated with developing any site will be borne by the Developer of the site and it is expected that there will be a reasonable profit for the developers.
It is not right and why should Webheath and the surrounding area accommodate over 50% of Redditch’s total housing allocation.	The Strategic Site at Webheath has capacity to accommodate approximately 400 dwellings. With regard to cross-boundary development 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into

	the built form of Redditch and cause least harm to the Green Belt Council tax from the appropriate authority will be required.
As the houses would be in Bromsgrove – would the local taxes and yet the costs be to those in Webheath/Redditch.	
We have lived in Great Hockings Lane in Webheath since 2000 and the road has still not been adopted by RBC-why has it taken so long and is still ongoing? How can Bryant Homes now Taylor Wimpey be allowed to get away with this for 13 years? Also we have to phone up every year to remind them to come and maintain the green areas-this is not a good track record.	Great Hockings Lane was adopted 8 years ago.
The housing plan does not appear to join up with other areas of council work; it is not coordinated with wellbeing, community safety, transport, reducing carbon emission, young people plans.	The emerging Local Plan No.4 seeks to achieve a range of Objectives, which reflect wider Council aspirations. For example the Plan contains 13 wide ranging Objectives covering issues such as natural, rural, historic environment, climate change, sustainable travel, crime and anti-social; behaviour, Town and District Centres and housing and employment provision, to name just a few.
Photographic Evidence submitted by E Morris – Objection saved in BORLP4 – Supporting Evidence	Noted.
Photographic Evidence regarding Visual Impact submitted by E Morris – Objection saved in BORLP4 – Supporting Evidence	Noted.

KEY ISSUE: Webheath Planning Application (Planning Application No. 2012/207/OUT)

<b>Sub Issues</b>	<b>Officer response</b>
How can the planning application be determined in isolation from the outcome of the Local Plan consultation and the wider ADR proposals	The timing of planning applications is not a matter for the Local Plan process. Applicants can submit planning applications whenever they wish. They will be determined in accordance with the planning policy framework in place at the time, with consideration of the emerging plan.
Application is damaging to Council sustainability objectives, particularly as pumping sewerage is unsustainable and costs more.	Any planning application will be determined on its own merits. With regard to pumping sewerage the Council is working with Severn Trent to find the most sustainable option for sewage treatment in the area. However each planning application will be required to demonstrate

	they have engaged with Severn Trent to ensure their site can be suitably served by infrastructure.
The proposed access to the planned development of the ADR is just ludicrous. There will be insufficient turning room into and out of the development and this is supported by the further proposal to allow emergency access by way of Pumphouse Lane – another totally inadequate route.	Worcestershire County Council Highways Department have been consulted as part of the planning application process. They have certain standards and requirements that must be met before certain access points can be permitted.
Have been previously assured by Taylor Wimpey that there would be no access from the Church Road ADR into Great Hockings Lane but in the updated Design and Access Statement 2013 states, <i>“Securing the land for the possible future connection to Great Hockings Lane”</i> . Concern that Great Hockings Lane cannot take additional traffic. The statement also adds, <i>“In addition, land has also been safeguarded for a potential future connection of Great Hockings Lane and this could be used to provide full vehicular or bus route through the existing residential area.”</i> This would have a great impact on the safety of children walking to school from the Defford Road end of the estate and along Church Road.	Worcestershire County Council Highways Department have been consulted as part of the planning application process. They have certain standards and requirements with regard to design and safety that must be met before certain access points can be permitted.
The Applicants suggest that by provision of Attenuation Reservoirs able to contain 100 year Storms, by digging out the foul Sewage Works, this does not take into account fears of congestion and annual blockage by detritus and the local high water table. Blockages in the connecting network will cause flooding downstream.	The Environment Agency were consulted as part of the Planning Application process, it is a requirement that they are satisfied with any flood risk mitigation measures before development can be permitted.
Ground conditions for infiltration should not be left until planning has been given. There are a mosaic of small problems flood zone 3a & 3b which should not be built upon. How are the developers going to address this in a plan when the flood zones are dotted about?	Policy 48 of the emerging Draft Local Plan No.4 requests: <i>“any necessary measures to mitigate flood risk are to be implanted, which must be outlined in a site specific Flood Risk Assessment”</i> and <i>“appropriate SuDS systems to attenuate and balance any surface water runoff must be incorporated.”</i>
Object to only one balancing pool instead of following their experts M-EC advice of creating two balancing pools.	Environment Agency would have been consulted as part of the planning application process and would need to be satisfied with the proposals.
According to the Drainage Strategy (20060 02 001) there will be a	Environment Agency alongside the Borough Councils Drainage

<p>connection via a new headwall which stated it was to be agreed with Environment agency this is incorrect. It is not the Environment Agency but Lead Local Flood Authority (LLFA) who have responsibilities but the headwall hasn't even been decided yet. With the bow brook having problems with water quality and its water quality will not meet EU directives by 2027 this should have been decided at outline planning stage.</p>	<p>Engineer would have been consulted as part of the planning application process and would need to be satisfied with the proposals.</p>
<p>Revised Travel Plan 2013 – Traffic in and out of development. Why should a shop generate more traffic than a fully utilised community facility used by the whole area (This is referring to the community building proposed).</p>	<p>There are assumptions regarding predicted journeys, WCC Highways Department would check any submitted data for accuracy.</p>
<p>Point 5.19 page 20 Table shows accessibility is dependent upon travelling to centre of Redditch.</p> <p>All places of employment are beyond Redditch Town Centre and would necessitate going into Redditch and out again to any one of the estates. Sustainability is very poor indeed.</p>	<p>As part of development of the site it is a requirement that the site is accessible by a choice of modes of transport, particularly sustainable transport.</p>
<p>Point 3.12 page 9 – comparing travel planning in Worcester and other two cities cannot be used as evidence for a travel plan in Webheath a rural backwater with small roads and some roads with no pavements. Insufficient comparison made.</p>	<p>WCC Highways Department would be consulted as part of the planning application process and they would check any submitted data for accuracy.</p>
<p>The developers have stated that with the addition of another site further along Church Road – they must have an indication of where this other site is otherwise why would they make this statement</p>	<p>It is not clear which site is being referred to in this comment. However this would have no bearing on the emerging plan policy as the Strategic Site is defined on the Policies Map.</p>
<p>Request that bat foraging has to be taken into account. What about obtaining a European Protected Species Licence?</p>	<p>Natural England would have been consulted as part of the planning application process and would have advised if such as licence was required.</p>
<p>On documentation 20069 63 024 shows a plan which incorporates a bridge which can be used to open up south side of ADR. And yet WCC states that only 200 can come out at Church Road. Insufficient data to make an informed decision.</p>	<p>Only 200 dwellings maximum can be delivered from one access point. If the remaining part of the site were to be developed an additional access point would be required.</p>
<p>The documentation provided by WCC show the original 68 bus</p>	<p>The applicants would have been required to submit a business case to</p>

<p>service as having 375 passengers per day and was withdrawn on the grounds that it was not financially viable. However new bus service calculations suggest that it will only need 240 passengers per day to break even. How can this possibly be if the existing service with 375 passengers did not make a profit? Objection these figures do not make sense.</p> <p>Removal of bus 68 service due to lack of use – even if a new bus is adopted it will only be so if the numbers are there.</p> <p>Public Transport improvements – Calculations for passengers and costs are unrealistic no sensitivity testing carried out.</p>	<p>WCC, who in turn would have scrutinised this report. The developers would be required to fund the public transport provision for a certain amount of time.</p>
<p>A bus stop will be provided on Church Road close to the site entrance – some concerns about this and the fact that traffic waiting behind the bus at this stop may be frustrated in to overtaking it – this was mentioned in one of the safety assessments but has been ignored. Could be sited elsewhere where in Church Road is safe then? Objection unsafe wherever put in Church Road and certainly not by site entrance.</p>	<p>WCC Highways Department would be consulted as part of the planning application process; they have certain safety requirements which would have been considered during the planning application consultation process. They would advise where the best place to site a bus stop would be. .</p>
<p>Object to the Taylor Wimpey (application no. 2012/207/OUT) MEC Transport Assessment (2012) being used as 'independent' evidence for this process to justify building 600 (Webheath ADR). RBC/BDC must commission a truly independent report to test resident's views that more vehicles upon the narrow lanes and roads, some without pavements, accident black spot, dips, blind bends/summits etc, will cause death or serious injury.</p>	<p>The Reports completed by Agents for the site are not considered as independent evidence base studies. They can provide additional detailed information, however with regard to evidence base documents the Borough Council has commissioned its own work which has been completed by Halcrow in consultation with WCC.</p>
<p>Taylor Wimpey have not fully utilised all other sites e.g. Barwell Hinkley Leicestershire</p>	<p>This is not a concern for the Local Plan process or any planning application process.</p>
<p>The landscape analysis in the EIA (of the planning application) is flawed.</p>	<p>This document would have been considered by the Case Officer and appropriate consultees such as Natural England or the Environment Agency. If it was flawed in any way it would have been considered through this process, it is not for the Local Plan process to reconsider</p>



	documents submitted as part of a planning application.
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**Policy 49 – Woodrow**

KEY ISSUE: Historic Environment

<b>Sub Issues</b>	<b>Officer response</b>
Use the findings of the Historic Environment Assessment to help inform the masterplanning of strategic sites and green infrastructure planning.	<p>This site fall within Historic Environment Character Zone (HECZ) 138 of the Historic Environment Assessment (HEA) which has been identified as having moderate potential for archaeology; therefore an appraisal of the site may be required prior to any development. The Policy will be amended which requires applicants to complete an archaeological appraisal to an appropriate level prior to development in accordance with Policy 35 Historic Environment.</p> <p><b><u>ACTION – Amend Policy to include criterion which says “The Historic Environment Record should be consulted during the formulation of development proposals to establish the potential for heritage assets and used to inform any necessary appraisal or evaluation of the site;”</u></b></p> <p><b><u>ACTION – Amend Reasoned Justification to include the following, “This site falls within Historic Environment Character Zone (HECZ) 138 of the Historic Environment Assessment (HEA) which has been identified as having moderate potential for unknown archaeology; therefore an appraisal of the site may be required prior to any development. Please see Policy 35 Historic Environment for more information.”</u></b></p>

KEY ISSUE: Emergency Services Infrastructure/developer contributions

<b>Sub Issues</b>	<b>Officer response</b>
Developer contributions will be required from new development in order to develop a new police facility in Redditch.	Infrastructure required to deliver development will be identified in the Infrastructure Delivery Plan, this will inform developer contributions

	required in relation to development sites.
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**Other chapters/ Appendices/ omissions**

KEY ISSUE: Appendix 2

<b>Sub Issues</b>	<b>Officer response</b>
Fully support allocation of the strategic site at Brockhill East in Bromsgrove District (Site 2) to meet part of the cross-boundary requirement. There will need to be a revision of the Green Belt boundary. A permanent change should be made addressing foreseeable future growth needs without the need to alter the boundary again at the end of the plan period so there should be a cross-reference in this Local Plan. Use Weights Lane, Butlers Hill Wood and Cladshill Wood as strong containing features.	Support noted.
This evidence is not up to date. Data provided is for 1 April 2011 - 31 March 2012. Why is there no data for 2012-2013?	The data for the 2012/13 monitoring period had not been collected at the time of publication of the draft Plan.
In the specified time period only 63 dwellings were completed. This means that the supposed Strategic Housing Target of 6380, less those 63 completions, leaves 6317 to be completed during the Local Plan No. 4 period (17 years). That equates to approximately 371 dwellings per year for 17 years. This means that there will be more than one house sold or rented every single day, for the next 17 years. Does that really sound like a viable target, given that the last available data shows that there were only 63 dwellings constructed in a 12 month period? The housing figure target is of questionable integrity, despite the Councils best efforts to justify it	The Plan period will run from 2011 up to 2030; in this period, it is expected that growth scenarios will experience 'peaks' as well as 'troughs'. The housing target reflects these market conditions throughout the whole of the Plan period.
Unfortunately the Redditch SHLAA (unlike the Bromsgrove SHLAA) does not contain any plans, so that it is not immediately clear where some of the sites are or the extent to which there are urban green spaces that could be used in preference to Green Belt.	Refer to SHLAA Appendix A – Included Sites, which details the full assessment of each site and includes a location map and, where appropriate, an indicative scheme for development.

Sub Issues	Officer response
<p>Plots 2 – 6 (A435) (Savills HCA Rep) identifies a gross area of 22 ha and a net area of 11.65ha. Dwelling capacity is 349 units so the plan underestimates</p> <p>Appendix 2 should be amended by adding plot 7 (Savills HCA Rep) to site 211. The total area of site 211 should be shown as 32.15ha gross. Total site is expected to provide a net developable area of approximately 16.5ha with a development capacity of approximately 420 – 515 units.</p>	<p>The areas identified for development and their capacity as shown in Appendix 2 is based on the Review of the A435 ADR and adjoining land. Officers do not consider this should be amended.</p> <p>The recommended land in this location is for employment development due to the adjacent uses in Redditch. Officers do not consider this should be amended.</p>
<p>Supports the proposed housing allocation of Site 215 – Land off Birchfield Road, Webheath, albeit, it is suggested that the capacity of the site should reasonably be increased to at least 30 dwellings. Proposed Allocation Site 215 is identified as Parcel A in the ‘Assessment of Brockhill West Green Belt against NPPF Green Belt purposes’. Wholeheartedly endorse the findings of the Assessment, which after careful consideration concludes that the designation of the land as Green Belt is an anomaly because it does not fulfil any of the three key purposes set out in NPPF. The land is not required to check the unrestricted sprawl of large built-up areas; it is not required to prevent neighbouring towns merging into one another; and it is not required to assist in safeguarding the countryside from encroachment. Of the opinion that the site is located within the existing confines of the settlement and it relates well to adjoining built development and roads. Development in this location will not only assist to meet the housing needs of the Borough in a sustainable location, but it will serve to strengthen the urban form of the settlement in this location.</p>	<p>Support noted.</p> <p>Sites identified in the SHLAA follow the prescribed guidance for density calculations. It states that capacities of sites should be guided by local level housing densities but where these do not provide a sufficient basis to make a local judgement, one approach to estimating potential is by sketching a scheme. Where sites have come forward by virtue of a planning application, the approved density has been used. As many vacant sites as possible have been ‘sketched’ by urban designers to determine density. Some sites have been based on density multipliers at the lower end of the density range. Officers consider this gives greater flexibility to meet housing need. If all sites were over estimated at the top of the density range, there is a risk that insufficient land has been identified to deliver the Plan.</p>
<p>Objection to allocation of Site 211 on Draft Borough of Redditch Local Plan No.4. Support for the A435 Review (Feb 2013) which does not allocate the entire Site 211 for development. Object to</p>	<p>Noted: <b>ACTION: Policies Map and SHLAA 2013 refresh to be aligned to reflect the findings of the A435 Review</b></p>

Sub Issues	Officer response
<p>development in the area between Claybrook Drive, Matchborough East and the A435 Mappleborough Green. The specific area of most concern is situated from the allotments (opposite Milhill Road) to a point opposite Winward Road.</p> <p>The reason for objection is Flood risk (evident by previous flooding events – 2007 in particular). The Wooded area south of the allotments is unable to hold volume of water coming into the area, which goes to Claybrook Drive and also the underpass which runs under Claybrook Drive with a path leading up to the A435. The Woodland, areas 5 and 6 in A435 ADR and Adjoining Lane Review page 12 – referring to page 6 (paragraph 1 and 2) are included in ‘blanket flood zone 1’, designation given by Environment Agency. This is inaccurate and should be amended to level 2. Believe there is risk of flooding to areas 7, 11, 15 and 16 (page 10 of A435 Review) – highway runoff from Gorcott Hill and Henley Road inclines away from The Dog Island into Claybrook Drive, this would not be Greenfield run-off.</p> <p>The culvert running below ground, across Allensmore Close is 24 inch diameter cast-concrete and has been observed to run at 90% capacity.</p> <p>Chamber Lids to both storm and foul system have been “blown – off” by volume of water in the system.</p> <p>Should development be granted the ‘corridor of cover’ for wildlife would be seriously curtailed resulting in the likely loss of wildlife.</p>	<p>The SFRA Level 2 identifies a risk of flooding to this site from both watercourses and from localised sewer surcharging. The SFRA Level 2 requires a site-specific FRA and drainage impact assessment for all proposed development in the site and states: <i>“Development of the site should be designed sequentially in order to direct development to areas of the site at lowest flood risk in the first instance and to preserve floodplain storage in the highest risk areas. Opportunities should also be sought through the design and layout for reducing the flood risk in the area”</i>.</p> <p>The ‘Review of the A435 ADR and adjoining land’ acknowledges that the site has a number of tree plantations and other natural features which may impact upon potential development. An initial assessment has been made of these features to inform the recommendations of the review but the review also states that any planning application</p>

Sub Issues	Officer response
<p>The allotments serve a social/ economic function in the locality.</p> <p>Support for continued designation of A435 ADR.</p>	<p>would need to be informed by the appropriate Ecological Assessments/Habitat Surveys and Tree Surveys.</p> <p>Agreed. The 'Review of the A435 ADR and adjoining land' recommends the retention of the Allotments as part of any development.</p> <p>The ADR designation will not be in place once Local Plan No.4 is adopted.</p>
<p>Site No. 15 (page 119) South of Scout Hut, Oakenshaw Road. This space is required as Public Open Space for informal recreation. This is the last piece of green land in the area. It is well situated for local housing as there is no public open space for surrounding developments.</p> <p>Existing housing developments should be completed before reconsidering the 'open space' is free and available for other uses. The area is safe and nearby car park is an asset.</p>	<p>This site was identified in BORLP3 to meet any Strategic Housing Requirement shortfall. As this site was not needed to meet BORLP3 needs, it has been rolled forward to contribute to the BORLP4 housing requirement. There is open space adjacent to this site totalling some 11 hectares.</p>

<b>Sub Issues</b>	<b>Officer response</b>
<p>Capacities of sites should be adjusted in line with objectors assessment of capacities, to reflect a total capacity of 1923 dwellings within the Borough</p> <p>The cross boundary capacities should be reconsidered for Foxlydiate and Brockhill East in line with the Iain Reid Landscape Assessment, and land at Dagnell End Lane included to make up the shortfall.</p>	<p>Sites identified in the SHLAA follow the prescribed guidance for density calculations. It states that capacities of sites should be guided by local level housing densities but where these do not provide a sufficient basis to make a local judgement, one approach to estimating potential is by sketching a scheme. Where sites have come forward by virtue of a planning application, the approved density has been used. As many vacant sites as possible have been 'sketched' by urban designers to determine density. Some sites have been based on density multipliers at the lower end of the density range. Officers consider this gives greater flexibility to meet housing need. If all sites were over estimated at the top of the density range, there is a risk that insufficient land has been identified to deliver the Plan.</p> <p>The Reid Assessment does not adequately address landscape issues and makes assumptions of capacity based on assumed density. This is not considered robust enough to recommend a capacity change for sites.</p>

## KEY ISSUE: Appendix 3: Schedule of Employment Sites

<b>Sub Issues</b>	<b>Officer response</b>
<p>Note the reference to land available at Ravensbank Drive and Winyates Green Triangle but we would remind the councils that though these sites may be allocated there may yet be substantial ecological issues that limit the overall developable area. The sites (especially at Ravensbank Drive) form a significant part of the catchment for Ipsley Alders SSSI and there may be LWS and</p>	<p>The estimated capacity of the Winyates Green Triangle has taken account of the Phase 1 Habitats and Protected Species Survey (Jan 2011), which suggests that for this site, it is unlikely that a large-scale development could be adequately incorporated without a significant loss and/or affect to the semi-natural habitats. A smaller development, if adequately located on poorer grassland, whilst minimising damage</p>



<p>protected species issues to resolve before development can proceed.</p> <p>With this in mind we would recommend that significant additional detail be sought regarding these areas before formal proposals come forward. The drainage to the wetland SSSI is particularly complex and further information is required in order to inform development decisions in the Ravensbank Area. Access to the Winyates Triangle is similarly complicated and is likely to involve the loss of parts of the Ravensbank Drive LWS. Resolving this difficulty will need further work.</p>	<p>to, and retaining where possible woodland, hedgerows, ponds and stream habitat, would have a significantly lower impact.</p> <p>Officers acknowledge and agree that appropriate evidence needs to be presented to identify constraints and mitigation measures before development can commence and would expect this to be undertaken as part of any pre-application discussions. If a net developable area of more than 4.5ha can be achieved in an appropriate and sympathetic manner, then officers would not wish to compromise comprehensive development of this site.</p> <p><b>ACTION: Alter policy wording to say ‘a minimum of’ 12 hectares will be accommodated within SOAD</b></p>
<p>Appendix 3 should be amended by deleting site IN82</p>	<p>Land within the A435 Review has identified some land as suitable to contribute towards the Borough’s employment requirement.</p>

KEY ISSUE: Appendix 4: IDP Summary Table and viability taking into account infrastructure needs

<b>Sub Issues</b>	<b>Officer response</b>
<p>Support the requirement to monitor against policies 11 (Green Infrastructure) and 16 (Natural Environment) and recommend that resources are secured to allow for this to be completed in a rigorous and timely manner.</p>	<p>The monitoring indicators will be resourced so that the data can be collected from the time of the implementation of the Plan (ie. from adoption) so that the delivery of infrastructure can be monitored.</p>
<p>Recommend that policy 39 (Built Environment) be monitored against biodiversity enhancement indicators, perhaps including the number of applications where biodiversity enhancement features were forthcoming within new buildings for example.</p>	<p>The monitoring of this is not necessary as there are no direct larger scale infrastructure provisions relating to Policy 36. There are other monitoring indicators that will feature regarding biodiversity enhancement which will cover this issue.</p>
<p>As Network Rail is a publicly funded organisation with a regulated remit its not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. Require developer contributions or CIL to fund such railway improvements; also require contributions towards</p>	<p>There has to be a correlation between the development and the needs for this type of infrastructure also has to be clearly justified. If during consultation on the IDP report this information is available, then it would be appropriate to amend the IDP. Further consultation with Network Rail will be required to clarify the specific areas of concern</p>

rail infrastructure where they are directly required as a result of the proposed development and where the acceptability of the development depends on access to the rail network.	
Ensure the viability and deliverability of development in accordance with §173 of the Framework is understood	It is agreed that the plan viability as a whole will need to be assessed before it can be considered sound.
Satisfy requirements of para 173 and 174 of NPPF where scale of obligations should not threaten viability. Properly asses viability as negotiation site by site is unrealistic – ref to the Harman Report	It is agreed that the plan viability as a whole will need to be assessed before it can be considered sound.
Recommended amendments to the 'Blue Light services' section of the IDP.	<p>Agreed to amend with up to date information. This will be confirmed in separate consultation on the IDP with stakeholders.</p> <p><b>ACTION: Delete existing sections of the IDP Report and replace with:</b></p> <p><b><u>“West Mercia Police (WMP)</u></b>  <b>Existing North Worcestershire police stations include:</b></p> <ul style="list-style-type: none"> <li>• Territorial Policing Unit Headquarters - Kidderminster</li> <li>• 8 Police Stations - Bewdley, Bromsgrove, Crabbs Cross, Hagley, Redditch, Rubery, Stourport-on-Severn and Wythall</li> <li>• 11 Police Posts - Bromsgrove, Kidderminster, Redditch and Stourport-on-Severn.</li> </ul> <p><b>It is the intention of WMP and White Young Green to prepare Strategic Infrastructure Assessments in relation to Bromsgrove and Redditch districts, once the respective councils have published their Local Plans confirming the development growth proposed for their areas.</b></p> <p><b><u>Hereford and Worcester Fire and Rescue Service (HWFRS)</u></b></p> <p><b>HWFRS is currently content that its existing infrastructure base</b></p>

	<p>can accommodate the delivery of planned development growth in Worcestershire. The exception to the above is the existing Bromsgrove Fire Station. The station is expensive to run and will incur increasing maintenance costs over time and is unfit to accommodate the future demands that will be placed upon it by the delivery of planned development and population growth. The decision was therefore taken to develop a new single Joint Police and Fire Station with WMP. The new station is currently under construction (at the time of writing) and is expected to open in Spring 2014.</p> <p>Notwithstanding the above, HWFRS is continuing to work positively with its partners to identify further options, e.g. in Redditch, to achieve efficiencies and to up-date existing facilities.”</p>
<p>The indicators for <i>creating and sustaining a green environment</i> include the <i>amount of SSSI, SWS and LNR designation lost (Hectares)</i> – Natural England would not expect the Plan to result in the loss of any land designated as a SSSI, and would expect the loss of locally designated sites to be minimal. We therefore consider further refinement of indicators would help to ensure they are meaningful, relevant and measurable, and suggest these should include indicators that reflect the priorities and principles set out in the emerging Green Infrastructure Strategy.</p>	<p>Agreed the IDP indicator for SSSI should be more stringent and reflective of policy</p> <p><b>ACTION: Amend indicator for Policy 16 in the IDP table “Amount of SSSI, SWS and LNR designation lost (Hectares)” to remove reference to SSSI. Create new IDP indicator to reflect the indicator in the Sustainability Appraisal regarding SSSI’s to read “Condition of Sites of Special Scientific Interest (SSSI) habitats”</b></p>
<p>Local Plan and/or IDP should reference requirements on developers to provide contributions to support the development of appropriate emergency services infrastructure and facilities.</p>	<p>There has to be a correlation between the development and the needs for this type of infrastructure also has to be clearly justified. If during consultation on the IDP report this information is available, then it would be appropriate to amend the IDP. Until then there is no evidence of need for facilities that relate to the development.</p>
<p>Suggested new measures for Policy 40 – High Quality and Safe Design: “Number and percentage of new residential dwellings meeting SBD New Homes Parts 1 &amp; 2 (“SBD award”)” “Number and percentage of new residential dwellings meeting SBD New Homes</p>	<p>Agreed for clarity the first two suggested amendments will help to understand the viability issues of delivering secured by design. At the present time, the gross area of non-residential developments is not possible to monitor as the Council do not collect gross development</p>

<p>Part 2 only (physical security only)”</p> <p>“Gross area of non-residential developments achieving SBD award”</p>	<p>area completions against SBD credentials, but this can be investigated.</p> <p><b>ACTION: Delete IDP Table Policy 40 monitoring indicator on SBD and replace with “Number and percentage of new residential dwellings meeting SBD New Homes Parts 1 &amp; 2 (“SBD award”)” and “Number and percentage of new residential dwellings meeting SBD New Homes Part 2 only (physical security only)”</b></p> <p><b>ACTION: Monitoring systems - check if this can be facilitated on uniform system</b></p>
<p>Suggested new measures for Policy 41 – Shopfronts and Shopfront Security: “Number of applications resulting in creation of more active shop frontages” (As defined by increasing natural surveillance opportunities from shop towards public space).</p>	<p><b>ACTION: Monitoring systems - check if this can be facilitated on uniform system</b></p>
<p>Deliverability of infrastructure is key, especially to the larger sites, yet there is support from Severn Trent for example, indicating that alternative sites to those at Webheath and Foxlydiate are preferable for providing sustainable and viable infrastructure (Overview of Potential Sewerage and Sewerage Treatment Impacts from Strategic Development Proposals for Redditch, STW December 2012).</p>	<p>The preference from STW is based on ease of access to the trunk sewers but this is just one aspect to sustainability. There are no reported issues or objections from infrastructure providers based upon the deliverability or viability of sewerage and its treatment.</p>
<p>I do not believe that the proposed Strategic Sites including Webheath ADR and the proposed site at Foxlydiate have demonstrated sufficiently that they will be capable of being brought forward for development in terms of infrastructure funding and delivery. There is no evidence included to support these two sites that demonstrates there will be a viable method of achieving this. The Monitoring and Implementation table identifies the evidence base - Strategic Housing Market Assessment (2012) Redditch Borough Council, RONA (2012), Strategic housing Land Availability Assessment (2012), NPPF and RSS evidence’. None of these documents contain information related to the funding or delivery of such infrastructure, and so the policy</p>	<p>The policy is supported by an IDP which sets out what is required and where funding is required which may not be related to the assembly of the site, the funding required is detailed. There are no reported issues or objections from infrastructure providers based upon the deliverability or viability of the two referenced sites subject to funding being secured.</p>

itself has no means of proving the suitability of sites for development.	
We welcome and support the recognition of the emergency services as infrastructure within the IDP report. This is consistent with the 'Worcestershire Infrastructure Strategy'.	Noted
A Strategic Infrastructure Assessment (WYG) will be submitted during the August/September 2013 public consultation on the Local Plan and will expand and evidence the requirement for contributions for emergency services infrastructure.	Noted
WMP should be identified as a 'Lead Agency' for policies 40 and 41 within the Infrastructure Delivery Plan Summary Table.	Noted and agreed <b>ACTION: Include WMP in IDP Summary Table</b>
Include the number and percentage of applications permitted which incorporate 'Secured by Design' as a monitoring indicator in Policy 41	This is a monitoring indicator related to the delivery of the policy and is not relevant to the delivery of infrastructure against this policy therefore it is not required.

## KEY ISSUE: Monitoring and Implementation

<b>Sub Issues</b>	<b>Officer response</b>
The implementation of the Local Plan is crucial to health and well-being. Include a policy that sets out the actions that will be taken not to monitor delivery and the circumstances when it will be judged that a partial/total review will be undertaken	Specific policies such as the housing policy and development strategy set out circumstances when actions like partial reviews and potentially full reviews would be necessary. Separate policies are therefore superfluous.

## KEY ISSUE: Strategic Flood Risk Assessment

<b>Sub Issues</b>	<b>Officer response</b>
In terms of the 'Bromsgrove District and Redditch Borough Strategic Flood Risk Assessment Level 1 Draft Report' (September 2008) by Royal Haskoning – Lack of information supplied where towns and villages downstream of the River Salwarpe and the Bowbrook have been flooded in 2007.	The SFRA has included information on downstream effects where there was information available. If the Councils and the stakeholders in the process did not have the details it wouldn't have been included. The key impact is whether or not a site has potential for downstream effects, and it is important to ensure that the potential sites around Redditch do not increase its surface water run off rates.

## KEY ISSUE: Reference to SPDs

<b>Sub Issues</b>	<b>Officer response</b>
Reference to the open space SPD and designing for community safety SPD questioned. They should not increase financial burdens on developers. SPDs should not contravene para 153 of the NPPF.	Noted, the two referenced SPDs are already adopted and therefore cannot increase financial burdens.

## KEY ISSUE: Housing and Employment balance

<b>Sub Issues</b>	<b>Officer response</b>
Redditch has been recognised largely as dormitory town going forward by our own officers with numerous sites allocated for future housing but little suitable space within our boundaries to create large scale employment.	<p>The Employment Land Review (ELR) (2012) identified the amount of employment land needed up to 2030, based on the population projections derived through the Strategic Housing Market Assessment (SHMA) (2012).</p> <p>The ELR employment growth projections were based on the implied increase in the economically active proportion of the projected population increase. This was then applied to the projected distribution of additional jobs across the Priority Employment Sectors (SIC – Standard Industrial Classification).</p> <p>Therefore a balance between additional housing needs and the employment needs of the additional economically active population up to 2030 has been established.</p>

## KEY ISSUE: Dedicated Infrastructure Policy

<b>Sub Issues</b>	<b>Officer response</b>
Reference to the open space SPD and designing for community safety SPD questioned. They should not increase financial burdens on developers. SPDs should not contravene para 153 of the NPPF.	Noted, the two referenced SPDs are already adopted and therefore cannot increase financial burdens.

<b>Sub Issues</b>	<b>Officer response</b>
Lack of policy provision regarding infrastructure and its funding is inconsistent with the NPPF.	The IDP sets out infrastructure requirement as a consequence of the draft Plan and its provisions and policies. There are cumulative effects, it will be for the planning obligations (likely Community Infrastructure Levy) to ensure cumulative effects are identified and contributions secured, including cross boundary. Policy reference to the intention of preparing a Community infrastructure Levy is not required in order to develop a CIL.
How will the approach to infrastructure provision adapt if the material issues differ from those envisaged? How will the Council adapt its approach to infrastructure provision as changes are made to legislation and/or new sources of funding for infrastructure are identified during the plan period?	Provision is unlikely to be materially affected as all sites with potential for development are included as draft allocations. In terms of larger sites, work has been completed on key infrastructure concerns like highways and sewerage treatment to look at various scenarios for growth including different locations and scales of growth. Any future changes to sources of funding can be reflected in the up to date CIL and its required monitoring
What is the Council's approach to infrastructure provision and funding in view of the increasing importance of neighbourhood planning?	There are no indications from the parish council or community groups of a desire to undertake neighbourhood planning. The Council will therefore follow standard approach in Localism Act and funding to communities and parishes will be as standard.
The Planning Inspectorate emphasised the need to consider and plan for infrastructure provision and its funding. Look at the case of the Melton Borough Core Strategy. The Planning Inspector advised that the Core Strategy should be withdrawn or it would be found unsound.	Noted this has been a consideration throughout the development of the Plan.

### Environment Agency Representation

*Note: The representation from the EA came very late, and came later than policies in the original tables were reported to PAP, therefore they are set out separately below. Policies 4 (Housing Provision), 5 (Effective & Efficient Use of Land) & 48 (Webheath) have been summarised and responded to in the relevant tables. 4 & 5 have already been reported to PAP.*

## Objectives

<b>Sub Issues</b>	<b>Officer response</b>
<b>Objective 1</b> – We would expect this to include reference to Water Framework Directive (WFD). The objective could be amended to include “and improvements to the water environment” (in addressing the objectives of the WFD).	Improvements to the water environment is covered in Objective 11: “To protect and enhance water, air and soil and minimise flood risk”
<b>Objective 11</b> – We support this.	Noted.

## Policy 3 - Development Strategy

<b>Sub Issues</b>	<b>Officer response</b>
<p>Previously questioned the wording of the policy, which states that “all strategic sites for development can come forward immediately in accordance with the policies in the Local Plan”. Would expect any infrastructure constraints identified within the Outline Water Cycle Study have been considered and addressed in consultation with Severn Trent Water Ltd, to inform this statement.</p> <p>Second para of reasoned justification refers to no known major constraints to delivery of development that would warrant a phasing policy – would expect discussions with Severn Trent Water on foul infrastructure to have informed this statement.</p>	Discussions are on-going with Severn Trent Water Ltd regarding the infrastructure required to support development in the Borough. To date, Severn Trent Water Ltd has not informed the Borough Council that delivery of development will be impeded by the related provision of waste water infrastructure.

## Policy 7 – Gypsies, Travellers and Travelling Showpeople



<b>Sub Issues</b>	<b>Officer response</b>
EA supports part (v) of the policy requiring satisfactory water supply, sewerage and refuse disposal facilities.	Noted
New sites should be located outside the 'high risk' floodplain, in considering the vulnerable nature of caravans (see Table 2 of the NPPF technical guidance). Site allocations will need to comply with the flood risk sequential test.	Noted. The Local Plan does not allocate sites for Gypsies, Travellers and Travelling Showpeople.

## Policy 11 – Green Infrastructure

<b>Sub Issues</b>	<b>Officer response</b>
EA supports the reference to 'waterways' within the policy and reasoned justification.	Noted

## Policy 15 – Climate Change

<b>Sub Issues</b>	<b>Officer response</b>
EA notes that the policy refers to Code for Sustainable Homes standards and references BREEAM and 'encourages' developers to meet the highest level.	Noted
EA supports the reference to waste hierarchy	Noted
EA notes the cross reference to flood risk and water supply in reasoned justification referring to policy 17 and 18. This is where we have recommended the inclusion of specific water efficiency targets based on the WCS evidence base	Noted

## Policy 16 Natural Environment

Sub Issues	Officer response
Part A (iii) – protect and where appropriate enhance natural resources. We support this but recommend that ‘where appropriate’ could be taken out in making the wording stronger.	Officers consider the phrase ‘where appropriate’ is suitable because it may not be appropriate for all relevant proposals to enhance the natural environment.
It is noted that the contaminated land comments previously included this policy have been removed. There could be a useful cross reference to policy 5 and the ‘contaminated land’ requirements (discussed above).	Policy 5 has been amended to include reference to contaminated land; this is considered adequate coverage in the Local Plan.

## Policy 17 – Flood Risk

Sub Issues	Officer response
The fifth paragraph of the policy should be amended to state ...“Exception Test (where appropriate) and have regard to the Strategic Flood Risk Assessment (SFRA) for Redditch. Development will be designed to be safe taking into account the lifetime of the development, and the need to adapt to climate change”.	Noted. The policy wording will be amended as suggested.  <b>ACTION: amend policy wording to: “...Exception Test (where appropriate) and have regard to the Strategic Flood Risk Assessment (SFRA) for Redditch. Development will be designed to be safe taking into account the lifetime of the development, and the need to adapt to climate change”.</b>
The reasoned justification could also include reference to safe development requirements, within the ‘minimum requirements of a FRA’ section. You could include this in bullet point 6 which already includes ‘safe access’, so that it refers to ‘safe development’ including setting of appropriate Finished Floor Levels, with flood proofing techniques considered (where appropriate), and safe access. EA previously suggested that this might be included in your Site Allocations and Policies DPD and/or local sustainability checklist.	Agreed, reference to ‘safe development’ can be included within the RJ.  <b>ACTION: insert reference to ‘safe development’ as suggested.</b>
Point iii of the policy could include...”incorporation of water efficiency measures (minimum of 105l/p/day and 80l/p/day from 2016 for residential and equivalent of BREEAM 3 credits for water consumption as a minimum for non residential, or AECB equivalent)	The BREEAM and Code for Sustainable Homes standards are the schemes currently employed by the Government, however these may be changed or superseded during the plan period. Therefore it is not considered appropriate to include the specific detail as suggested.

and...”. However this detail may sit better in Policy CS18, perhaps with a cross reference to this policy	
EA would not support the inclusion of the final paragraph, within the reasoned justification, on page 48 relating to new flood defence measures to enable development i.e. encouraging developers to fund on-site flood defences to allow new development. The inclusion of flood defences may be considered appropriate to help protect existing properties. We appreciate that it may be necessary in ‘exceptional’ cases to employ flood defences where a particular development may occur irrespective of the flood defences following application of the sequential test and exception test (where necessary) and consideration of safe development requirements. Such flood defences would need to be designed to an appropriate standard of protection (including freeboard allowance) and be fit for purpose, including an assessment of structural integrity, for the lifetime of the development. Flood defences should only be permitted where there are significant wider sustainability benefits and the Flood Risk Assessment demonstrates no adverse impact on the flood regime (flows and storage) and considers a reduction (betterment) in flood risk in line with the policy aims of the NPPF (technical guidance). An assessment of defence breach and overtopping risk would also be necessary.	Officers note that flood defences would only be acceptable in ‘exceptional’ cases; the relevant paragraph of the RJ will be reworded to reflect this.  <b>ACTION: Reword RJ to make it clear that new flood defences are necessary only in exceptional cases.</b>

## Policy 18 – Sustainable Water Management

<b>Sub Issues</b>	<b>Officer response</b>
Point (ii) not to exceed and where possible improve upon ‘greenfield’ rates – could be a bit ambitious (too stringent) for brownfield sites. We would therefore recommend the policy is reworded to state – “aim to reduce the existing runoff rate, but not result in an increase in runoff...”	Officers agree; this proposed change is consistent with the recommendations of the Outline Water Cycle study.  <b>ACTION: Amend principle ii. to state: “ensure that discharge rates from development do not exceed, and if possible, improve upon existing runoff rates;”</b>

<p>Your outline WCS identifies local water resource constraints (evidence for water efficiency measures) and in the policy the focus of this is on SuDS. There is a reference to development incorporating greywater recycling and rainwater harvesting – these are techniques more associated with the higher level 5/6 CSH (80 l/p/d) standards for water. The outline WCS, referred to in this policy, does refer to general targets being set for new developments in relation to water efficiency measures with reference to Level 3/4 CSH for water i.e 105 l/p/d; and more stringent levels from 2016.</p>	<p>The BREEAM and Code for Sustainable Homes standards are the schemes currently employed by the Government, however these may be changed or superseded during the plan period. Therefore it is not considered appropriate to include the specific detail as suggested.</p>
<p>The second paragraph of reasoned justification refers to use of SuDS unless it is demonstrated they are inappropriate. Generally there is a type of SuDS which can be used for any development site. Whilst this requires careful consideration and design i.e. on contaminated sites etc, it is possible to include SuDS on such sites. For example use of attenuation ponds with appropriate lining. We would therefore recommend that the policy includes a sentence to state that – “All development proposals, including changes to existing buildings, include appropriate sustainable drainage systems (SUDS) to manage surface water”.</p> <p>The reasoned justification should include a line to reference the need for careful consideration of SuDS, including investigation and appropriate measures, on some sites particularly where contaminated land may be an issue.</p>	<p>Agreed. The second sentence of the policy will be reworded to reflect the suggested wording.</p> <p><b>ACTION: re-word 2<sup>nd</sup> sentence of policy to “Therefore, all development proposals, including changes to existing buildings will require the inclusion of Sustainable Drainage Systems to manage surface water and will be required to treat all surface runoff on site.”</b></p> <p>The RJ already includes reference to the need to investigate appropriate SuDS measures, however there is currently no reference to contaminated land; this can be included.</p> <p><b>ACTION: insert reference to consideration of contaminated land in relation to SuDS into RJ.</b></p>
<p>There is a reference to water quality in the policy and last paragraph of the reasoned justification refers to WFD (Water Framework Directive). We would recommend that Paragraph 7 of the Policy is amended to help deliver WFD objectives. We would recommend the addition of:</p>	<p>Officers agree that reference to the WFD should be included in the policy wording. Reference can also be made to the conservation and enhancement of watercourses and riverside habitats within the policy and RJ.</p>

<p>Development proposals will be permitted which:</p> <p>Do not lead to deterioration of EU Water Framework Directive (WFD) water body status; do not have a negative impact on water quality, either directly through pollution of surface water or groundwater, or indirectly through overloading of Wastewater Treatment Works. Help to conserve and enhance watercourses and riverside habitats. This will be achieved, where necessary and feasible, through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of any aquatic environment in or adjoining the development site.</p>	<p><b>ACTION: include reference to WFD in policy and include reference to conserving and enhancing watercourses and riverside habitats where is it necessary and feasible in policy and RJ.</b></p>
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## Policy 43 – Leisure, Tourism &amp; Culture

<b>Sub Issues</b>	<b>Officer response</b>
<p><b>B – Abbey Stadium</b></p> <p>Welcome the reference in the reasoned justification to appropriate measures to protect and enhance the River Arrow corridor. Last para states ‘where development proposals affect the floodplain of the River Arrow, an assessment of flood risk should be made...’. Any new development should be located outside of the floodplain, within Flood Zone 1 (low probability of fluvial risk).</p>	<p>Noted</p>

## Policy 45 – Cemeteries

<b>Sub Issues</b>	<b>Officer response</b>
<p>Acknowledge point iv. and v of the policy. EA question where the reference...“to ensure dryness of the soil for a minimum depth of 2.13 metres” has been taken from? We would recommend that there are no burials into standing water informed by an appropriate risk assessment in line with our cemetery guidance and policy (see</p>	<p>Noted. Criterion iv will be amended to reflect the EA guidance and policy.</p> <p><b>ACTION: reword criterion iv to state:</b></p>

<p>below). i.e. 'Burials shall take place within the unsaturated zone (between the land surface and the water table)'. Also as a minimum, burials shall not take place within a minimum distance of: 250 metres of any potable supply (including wells and boreholes); 30m from any surface watercourse, spring or pond; and 10m of any field drain.</p>	<p><b>"iv. in an area that is not currently prone or likely to become prone to water logging. Burials shall take place within the unsaturated zone (between the land surface and the water table) and not within a minimum distance of: 250 meters of any potable supply (including wells and boreholes); 30 meters from any surface watercourse, spring or pond; and 10 meters of any field drain;"</b></p>
<p>Point v. refers to domestic water supply; however there should also be a more general reference to protecting the water environment ('controlled waters'). It may be better to state "supported by an appropriate risk assessment to demonstrate that there is no adverse risk of pollution to controlled waters including domestic water supplies, or includes appropriate measures, including monitoring (where necessary) to prevent the risk".</p>	<p>Noted. Criterion v will be amended as per the suggested wording.</p> <p><b>ACTION: amend criterion v to state:</b></p> <p><b>"v. supported by an appropriate risk assessment to demonstrate that there is no adverse risk of pollution to controlled waters including domestic water supplies, or includes appropriate measures, including monitoring (where necessary) to prevent the risk;"</b></p>
<p>2<sup>nd</sup> para of the reasoned justification refers to the Environment Agency being consulted with regard to the protection of watercourses. It would be better if this referred to "protection of ground and surface waters ('controlled waters' as defined under the Water Resources Act 1991)".</p>	<p>Noted. The suggested wording will be used in the RJ.</p> <p><b>ACTION: amend RJ paragraph 2 to include the suggested wording.</b></p>
<p>A reference to EA Cemeteries Guidance (Assessing the groundwater pollution potential of cemeteries); and 'Groundwater Protection: Principles and Practice' (GP3), November 2012, document could be included here.</p>	<p>Noted. A reference to the guidance can be included in the RJ.</p> <p><b>ACTION: Include reference to the EA guidance in RJ.</b></p>

## Policy 46 – Brockhill East

<b>Sub Issues</b>	<b>Officer response</b>
<p>Acknowledge the inclusion of points ix, xii, xvii, xviii and xix relating to green infrastructure and the Red Ditch, biodiversity, flood risk, SuDS and drainage (infrastructure provision).</p>	<p>Noted.</p>
<p>Note first phase to be delivered in first 5 years. We would expect this</p>	<p>Severn Trent are being consulted on an on-going basis during plan</p>

to have been informed by discussions with Severn Trent Water.	preparation.
Reasoned justification 'Design and the Environment' refers to GI concept statement, picks up watercourse and balancing areas. The policy and reasoned justification could be further informed by reference to the WFD. The 'Brockhill East' site is covered by two waterbodies:  1. River Arrow – source to confluence of Spernall Hall Farm, which is currently classed as 'moderate' status. 2. Batchley Brook – source to confluence of the River Arrow.  The aim is to achieve 'good status' by 2027. This development site should seek the opportunity to improve the waterbody catchments i.e. to meet 'good status' by inclusion of measures to enhance water quality and biodiversity for example.	Policy will be amended to ensure that new proposals consider how they can improve the waterbody Catchments.  <b><u>ACTION – Insert criterion into Policy which reads “proposals should consider how they can improve the ecological status of the River Arrow and the Batchley Brook”</u></b>  <b><u>ACTION – Insert sentence into Reasoned Justification which states “Proposals should consider how they can improve the ecological status of the River Arrow and the Batchley Brook through consultation with the Environment Agency.”</u></b>
Note – the Green Infrastructure Concept Statement for Brockhill East was produced without our involvement	This Statement has been produced by Worcestershire County Council and has not yet been finalised.
Flood Risk – should include a reference to flood modelling of the watercourse, which will be required to define the floodplain extents as part of any site specific Flood Risk Assessment (FRA), (as Level 2 SFRA mapping technique is similar to that used on our Flood Zone Maps) and the requirement for safe development.	A sentence will be included as per recommendation.  <b><u>ACTION – Insert sentence into Policy to read “flood risk measures must be informed by a site specific flood risk assessment and flood modelling will be required, with all mitigation measures fully implemented and no development taking place within 8m of the watercourse;”</u></b>

## Policy 47 – Land to the Rear of the Alexandra Hospital

Sub Issues	Officer response
Generally the policy seems to be saying the right things in terms of flood risk/biodiversity.	Noted.
Whilst the site is located within Flood Zone 1 (low probability of fluvial risk) based on our 'indicative' Flood Map there is an 'ordinary	The policy will be amended to reflect suggestion.

<p>watercourse' (this appears to be un-modelled based on the scale and nature of the watercourse – less than 3km<sup>2</sup> catchment) to the south (adjacent to the site) and some 'issues' within the site area which may pose a flood risk. We note that the infrastructure requirements detail the sequential approach and the need for FRA and drainage assessment. The reasoned justification should detail the need to assess the watercourse, including potential modelling, to inform developable areas and safe development.</p>	<p><b>ACTION – Amend criteria to read “develop the site sequentially to direct development to areas of the site at lowest flood risk and submit a site-specific Flood Risk Assessment (FRA) <u>which assesses the watercourse to the south of the site</u>, and drainage impact assessment”</b></p> <p><b>ACTION – Insert the following into the Reasoned Justification:</b></p> <p><b><u>“An assessment of the watercourse which runs adjacent to the site to the south should be assessed including potential modelling, to inform developable areas and safe development.”</u></b></p>
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## Policy 49 – Woodrow

<b>Sub Issues</b>	<b>Officer response</b>
<p>This site was not considered in the Level 2 SFRA. However, the site is located within Flood Zone 1 (low probability of fluvial risk) based on our 'indicative' Flood Map. There are no ordinary watercourses on this site based on our mapping records</p>	<p>Noted.</p>

## Appendix 4 – IDP Summary table

<b>Sub Issues</b>	<b>Officer response</b>
<p>This identifies foul drainage (sewage) infrastructure requirements to some extent for strategic sites and the sustainable water management policy – where some costing is provided. It outlines where upgrades may be required to enable the delivery of strategic sites, but is perhaps lacking some detail around the cost and timescales to demonstrate development can come forward as proposed. EA note that this is a summary and have not received a copy of the actual Infrastructure Delivery Plan.</p>	<p>Discussions with Severn Trent Water Ltd are on-going and specific consultation has recently been carried out in relation to the Infrastructure Delivery Plan (IDP).</p> <p>It should be noted that the Draft Infrastructure Delivery Plan was available on the Borough Council's website during the consultation period and is still available to view now. A revised draft of the IDP will be published at the same time as the Publication version of the Local Plan (anticipated September 2013).</p>



<p>EA would recommend that you seek the views of Severn Trent Water. The onus is on the utility company to confirm that they can accommodate all development within existing operational consents or looking at capacity/build rates through improvements confirm 'how' (via Asset Management Plan (AMP), or acceleration/possible developer contributions/section 106) and 'when'.</p>	
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## Maps

### KEY ISSUE: Key Diagram

Sub Issues	Officer response
<p>The Key diagram does not show the A435 ADR land nor the land between it and the A435 as a housing site requiring cross border cooperation. The position of Redditch BC and Stratford-on-Avon DC remains unclear as to whether development of the land between the ADR and the A435 in Stratford District will count towards Stratford housing numbers or Redditch housing numbers. Either way, and as explained above, the development of the A435 ADR requires co-operation from Stratford-on-Avon DC. Redditch BC is therefore dependent upon Stratford DC to deliver development within Redditch Borough to meet Redditch's needs. This should be acknowledged on the Key Diagram. If the land between the A435 and the ADR would also contribute to meeting Redditch needs, then this should also be shown the Key Diagram as a cross boundary housing site.</p>	<p>Land at the A435 falling within Stratford District cannot be shown on the Policies Map or Key Diagram as a cross boundary housing site as it is not within Redditch Borough. In addition the Stratford-on-Avon District Core Strategy does not currently make provision for meeting the housing requirements of Redditch on land at the A435 – this may come later as part of their site allocation document.</p>
<p>Serious objection to the Policies Map and Key Diagram which shows the HDGS sites 1 and 2 as cross boundary sites</p>	<p>The cross boundary sites were not shown on the Draft Policies Map (March 2013). However the policies map is required to illustrate geographically the application of the policies in the adopted development plan covering the Local Authorities administrative boundary. The site will be shown on Bromsgrove's policies map.</p> <p>Paragraph 157 of the NPPF requires Local Plans to “<i>indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;</i>”</p> <p>The Key Diagram depicts the cross boundary housing sites (sites 1 and 2) as well as the Eastern Gateway.</p> <p>20 different sites were considered around the periphery of Redditch.</p>

	After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.
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## KEY ISSUE: Policies Map

Sub Issues	Officer response
<p>The draft Proposals Map shows the A435 ADR land (HCA plots 2 – 7) to be allocated for development. Plot 8 is shown without specific allocation. Plot 1 is outside Redditch Borough.</p> <p>Plots 2 – 6 are proposed to be allocated for residential development. Appendix 2 identifies the sites having an area of 10.25ha and with capacity for 184 dwellings.</p> <p>Plot 7 is proposed to be allocated for employment development. Appendix 3 identifies it as 7.78ha.</p> <p>The Proposals Map should be amended to remove proposed allocation IN82 and to show that area of land as a housing allocation.</p>	<p>The Policies map is yet to be updated to take account of the development areas identified in the Review of the A435 and Adjoining Land because it was based upon the previous SHLAA sites which was last completed in 2012.</p> <p><b>ACTION: Policies Map and SHLAA 2013 refresh to be aligned to reflect the findings of the A435 Review</b></p>
<p>The Trust is generally supportive of the identification of the land to the rear of the Alexandra Hospital as a strategic development site, it is considered that any development should be solely for housing rather than mixed use purposes as a housing use is considered more compatible with the adjoining hospital site.</p>	<p>Although housing is a compatible use it is considered some employment development can be delivered sensitively. It would be complimentary to hospital services to have compatible employment use at this site.</p>
<p>The term SWS (Special Wildlife Site) has now been replaced with LWS (Local Wildlife Site) and it may be helpful to amend the document to reflect this change.</p>	<p>Noted. The Policies map will be amended to reflect this change in terminology.</p> <p><b>ACTION: Replace SWS with LWS on the Policies map and key</b></p>

## KEY ISSUE: Strategic Site Maps

<b>Sub Issues</b>	<b>Officer response</b>
Use the findings of the Historic Environment Assessment to help inform the masterplanning of strategic sites and green infrastructure planning.	Indicative Vision Maps have been drawn up for each of the Strategic Sites. These take into account the findings of the Historic Environment Assessment (HEA) and green infrastructure planning. The Strategic Site policies also take green infrastructure and the HEA into account.

## Sustainability Appraisal

KEY ISSUE: Support for SA

Sub Issues	Officer response
Natural England are generally satisfied that it meets requirements for Sustainability Appraisal and Strategic Environmental Assessment and has provided a robust framework for the assessment of the draft Plan, in terms of its consistency with the principles of sustainable development, which has helped to refine emerging policies.	Noted

KEY ISSUE: Webheath

Sub Issues	Officer response
Contains several invalid scores within the matrix table for Webheath.	The SA has been completed with a consistent approach used for the assessment of all large sites and strategic sites. It would not be appropriate to amend individual scores at this would make the analysis inconsistent.