

Housing Growth Consultation – Consultation Responses

Site 1 – Foxlydiat (Area 4) - OBJECTION

KEY ISSUE: Biodiversity/ Natural Environment

Sub Issues	Officer response
<p>Habitats for flora and fauna will be destroyed and would be damaging to rare breeds i.e. natterer and pipistrelle bats, avocets, great crested newts, orchids, skylarks, mallards, badgers, pheasants, honey buzzards, common buzzards, swallows, green woodpeckers, greater spotted woodpeckers, goldfinches, nuthatches, cuckoos, starlings, fieldfares, barn owls, sparrowhawks, Dormice, grass snakes, hares, rabbits, Curlews, Chiff Chaffs, kestrels, Meadow Pipits, partridge, redwings, Partridges, Plain White Doves, Bullfinches, swallows, herons, hares, water voles, shrews, trout, butterflies, Osprey, Goldcrests, Little Owls, Tree Creepers, Kestrels, Swifts, Jays, House Martins, Swallows, Skylarks, Sedge Warblers, Great Tits, Whitethroats, Willow Warblers, Long Eared Owls, Scandinavian Redwings, Robins, Fieldfare Red Kites, Egrets, Long Tailed Tits, Quail, Oyster Catchers, Blue Tits, Wood Warblers, Yellowhammers, honey bees, Nuthatch, moths, deer and otters (EU directive (Annexe IV) council directive 92/43/EEC on conservation of natural habitats and of wild flora and fauna).</p> <p>Area 4 is an important wildlife corridor between neighbouring copses/woods which if lost would leave isolated pockets of unsustainable wildlife.</p> <p>Biodiversity sightings – photographic evidence submitted by E Morris and saved on Joint Shared Drive</p>	<p>Before development commences and an 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 master planning of the site in order to maximise opportunities for biodiversity and recreation and mitigate the effects of development on biodiversity such as planting to encourage natural foraging, artificial bat roosts etc</p>
<p>Birdlife will be affected with the removal of hedgerows</p>	<p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure. This should include a hedgerow assessment, determining which</p>

Sub Issues	Officer response
	hedgerows are worthy of retention and protection.
The imposition of large amounts of street and house lighting, the disturbance and noise of cars etc. Low level lighting must be installed to reduce energy consumption and light pollution.	Planning Conditions assigned to planning applications can minimise impact during the construction phase. There will be an imposition but design of development informed by a habitats survey can mitigate against long term impacts.
Foxes will be forced into houses spreading disease or injury to the public	This is not an issue that determines if this location is better/ worse than another.
Following lane widening to accommodate increased traffic flows, further widening would be required to accommodate new ditches, which would impact on the native hedges and would change the rural character of the area	Specific road layouts are not known yet, detailed analysis will be completed, however a hedgerow assessment should determine which hedgerows are worthy of protection and retention. It is inevitable given the scale of development that the rural character of the area will change
It is stated that sites will have a “Strategy and Management Plan for green infrastructure which maximises opportunities for biodiversity and recreation.” How can building 2800 houses maximise biodiversity and recreation, if you want to “maximise” it don’t build in the first place.	It is essential that houses are delivered to meet Redditch need alongside this it is important to incorporate the existing natural environment as much as practicable. In order to achieve this a suitable strategy must be in place.
Development will result in the loss of important trees	An ecological assessment will need to be completed which includes tree and hedgerow analysis, this would need to be submitted as part of any planning application. The protection of trees will be dealt with through the application process and any removal of trees to enable development will be kept to a minimum.
Cannot “protect...the distinctive character...natural and historic environment” if undulating ridge and furrow fields developed and TPO hedges/trees removed	NPPF guides local planning authorities to meet their objectively assessed housing needs. 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. The protection of trees will be dealt with through the application process and any removal of trees to enable development will be kept to a minimum.
Threats to destroy a large tract of beautiful and valuable countryside in complete conflict with Objective 9	It is not possible for one element of development to fully meet all 13 Objectives, the development plan aims to balance the 13 objectives overall. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2

Sub Issues	Officer response
	were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.
When developing at the density required to provide the housing will not be possible to show any significant sensitivity to the valuable natural habitats that we know exist within the area	<p>The HGDS paragraph 3.45 states, <i>“A density of 30 dwellings per hectare (dph) was used to calculate area capacities. The majority of existing development in Bromsgrove and Redditch is relatively low density and therefore at this density it is possible to provide a realistic figure with a proportion of areas likely to exceed 30 dph. Using the figure of 30 dph ensures that housing potential is not overestimated and as a result the combined total of developable areas can be viewed as a minimum.”</i></p> <p>The extent of Site 1 has a greater capacity than required for 2800 dwellings; this is to allow for natural habitats and green infrastructure to be an integral part of the scheme.</p>
Bow brook identified by Environment Agency as failing to meet “good ecological status” as required by the Water Framework Directive.	It is not for any new development to rectify any existing problems as long as it does not exacerbate them. 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.
The “Norgrove” section of Swans Brook that goes as far as the Ford on Pumphouse Lane is an “Area of Wildlife that is of County Interest”. The section of Swans Brook that leads from the Ford to the Pumping Station at Curr Lane and beyond, should also be considered a site of equal “County Interest”. It is a watercourse worthy of protection and enhancement	It is not clear where this quotation is taken from, the Worcestershire Biodiversity Partnership Rivers and Streams Action Plan makes reference to improvements along Bow Brook and other watercourses but does not refer to Swans Brook.
As the more recent survey has revealed higher grading in the Foxlydiate area, than the original pre-1988 survey, Redditch and Bromsgrove Planning should confirm the current grading quality of Area 4 before considering as potential building land	Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed housing needs. It is considered that the quality of agricultural land is a minor constraint to development.
Emphasise the importance of the Swans Brook LWS and anticipate that upstream sections of the brook (which fall within this site) and additional smaller watercourses which feed into it will need the same degree of protection and buffering as the LWS. The housing numbers proposed (2870) may need to be reduced in light of further detailed	The extent of Site 1 has a greater capacity than required for 2800 dwellings; this is to allow for natural habitats and green infrastructure to be an integral part of the scheme. An ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.

Sub Issues	Officer response
evidence	
Proposed Growth Option 1 (Areas 1, 2 and 3) has overall, the fewest potential ecological constraints to development, whilst areas to the north-east of the A448 and west of the A441, potentially have the most.	An ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.
No over-riding ecological constraints have been identified from the initial survey work and evidence reviewed to date.	Noted, an ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.
Development affords significant opportunities for improving biodiversity through change of land use and incorporation of ecological enhancements, which will accord with national and local planning objectives and aims of the UK and Worcestershire BAPs.	Agreed, the policy is aiming to ensure that where there may be losses to biodiversity that there are opportunities taken for mitigation against that loss and improvements elsewhere around the site.
There should be scope to retain important existing hedgerows within the area and to strengthen boundary treatments around the peripheries.	The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure. This should include a hedgerow assessment, determining which hedgerows are worthy of retention and protection.
The area is not subject to any statutory or non-statutory nature conservation designation	Noted.
There are no scheduled ancient woodland within the area. The nearest area of ancient woodland, Hennal's Wood	Noted.
Area dominated by grassland, which largely exhibits a limited species composition. One arable field is in the area but due to intensive management, few if any other plant species present. Edges of the field have limited species diversity colonising from adjacent grassland.	An ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.
Height, structure, species composition and management hedgerows varies, although generally dominated by native shrub species, often with semi-mature to mature standard trees, with several potential veteran trees present.	Noted.
Habitats relatively common in the local area and are unlikely to be of greater interest than similar habitats in the wider countryside	An ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.
Habitats that represent better examples of BAP priority habitats could be readily retained within a sensitively designed masterplan,	The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure.

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<p>potentially as wildlife corridors within Green Infrastructure.</p> <p>There is opportunity to retain, protect and enhance habitats/ features of greatest ecological value and incorporate within development managed for the benefit of biodiversity and recreation in accordance with the NPPF and Local Plan policies B(NE).1 and B(NE).3, and Revised Draft Core Strategy policies 2 and 5.</p> <p>Opportunity to expand existing woodland, through native woodland planting, providing long-term buffers to retained woodland and space for species to expand their range. Opportunity to secure a long-term program of positive management of existing woodland areas would be available.</p>	<p>The BAP will be taken into consideration and an ecological survey will be completed to the appropriate standards, in accordance with relevant legislation as part of any planning application.</p>
<p>Change in land use due to development would benefit ponds and off-site watercourse, as these habitats/ features would no longer be subject to run-off from agricultural fertilisers/ chemicals.</p>	<p>Any application for development will be dealt with in consultation with the Environment Agency. The development will be required to not exacerbate any problems downstream.</p>
<p>North western sector of Area 4 is the least suitable for development of those selected in the HG document as it has “more than 60%” chance of being “Best and Most Versatile” land, is open and obviously well-cultivated, is part of HECZ 147b whereas other two sectors are part of 146c</p>	<p>The quality of the land is one consideration, there are other considerations such as high ridge lines which may determine areas within the site that are less suitable for physical development, however this site boundary chosen presented the strongest defensible boundaries in Green Belt terms.</p>
<p>Proximity of fields and trees is known to be beneficial to mental health/well-being, cannot ‘improve quality of life and sense of well-being’</p>	<p>NPPF guides local planning authorities to meet their objectively assessed housing needs. 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. The intention is not to build houses without integrating the natural environment element. The Policy states that <i>“the sites will have an overall Strategy and Management Plan for Green Infrastructure which maximises opportunities for biodiversity and recreation, whilst protecting existing biodiversity habitats and landscape geodiversity.”</i></p>
<p>‘Protecting’ existing habitats...landscape geodiversity’ - by building over the top/changing topography?</p>	<p>It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical</p>

Sub Issues	Officer response
	development.

KEY ISSUE: Flood Risk

Sub Issues	Officer response
<p>Development will impact on Bow Brook and tributaries that run into Norgrove Pool, Elcocks Brook, Shell Brook. The Bow Brook floods regularly with water flooding into gardens.</p> <p>If you decide that 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.</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.</p> <p>A flood risk assessment of the site will determine how this can be achieved for this site but it should be noted that there is no objection in principle from the Environment Agency.</p>
<p>Soil erosion on farmland. Rivers and water courses cannot cope with further surface water from proposed developments.</p>	<p>Soil erosion is not known to be a significant issue in this location. As surface run-off should not increase as a result of development this concern should not be exacerbated.</p>
<p>Concern localised flooding will be magnified. Potential for flooding at Feckenham. Concern over previous flooding effects on Droitwich Spa, Salwarpe, Droitwich Canal Basin, Vines Park in Droitwich, Huddington, Shell and Himbleton. 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 Bow Brook have been flooded in 2007. Concerns related to storm and surface water run off from the proposed development into lower field and property (Holyoakes Farm, Holyoakes Lane) and into the surrounding roads and into the brook which is already under pressure. The building of the A448 and the subsequent "landscaping" of the excavated subsoil from the new road along the adjacent field edges creating the ridges mentioned in your report, led to significant and ongoing water management issues downhill⁴.</p>	<p>A Site Specific Flood Risk Assessment (FRA) will need to address downstream effects of development. A FRA will take account of flooding from all sources and historic flooding.</p> <p>ACTION: Ensure a Site Specific Flood Risk Assessment request is included in either in the Policy or ensure there is reference to site level requirements elsewhere in the BDC plan.</p>
<p>Part of the proposed area is criss - crossed by a stream, regularly in flood and contains a spring with a pool. The land slopes and is wet and boggy.</p>	<p>A Site Specific Flood Risk Assessment (FRA) will consider areas at risk and appropriate mitigation measures will be employed. The draft policy requires that surface water run-off is managed to prevent</p>

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<p>Gypsy Lane in area 4 suffers from some very specific flooding problems related to earlier development i.e. the building of the A448 in the 1970s, and suffers from considerable run off not just of water but also silt (land erosion).</p> <p>High concentrations of clay with lower layers of blue and orange indicating longstanding waterlogging.</p> <p>⁴ Flooding in Holyoakes Lane outside Holyoakes Cottages, flooding through the interior of the longbarn at Holyoakes farm and flooding within the yard and gardens of Holyoakes Farm</p> <p>⁵ Environment agency “Factors that affect erosion and run off “Steep fields can cause water to run off at a rapid rate. This is particularly the case where water percolation into the soil is slow. Highest risk are those fields at 7 degrees. Water will pond when it reached a flat area.</p> <p>Photographic evidence submitted by J Godwin and saved on Joint Shared Drive</p>	<p>flooding on and around the site through the use of Sustainable Urban Drainage Systems (SUDs).</p>
<p>Basic infiltration systems for surface water management will not work in this area due to the heavy clay.</p>	<p>Agreed, there are alternative SUDs methods that can be used which do not use infiltration techniques.</p>
<p>Flooding has increased since the completion of the Priest Bridge sewage treatment works and since additional houses were last built in Redditch within this catchment area.</p>	<p>A FRA will take account of flooding from all sources and historic flooding.</p>
<p>Run-off, flood water and ground water to Feckenham is likely even with attenuation reservoirs.</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>Provision of Spill Ponds (attenuation reservoirs able to contain 100 year storms), gravity flooding will be controlled. Due to congestion, annual blockage by detritus, the local high water table and blockages</p>	<p>A Site Specific Flood Risk Assessment (FRA) will need to be completed for this site. This assessment will also address downstream effects of development. Drainage mitigation measures will be</p>

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<p>in the connecting network, relying on this method of flood control will result in a much higher likelihood of flooding downstream in Feckenham. What specific safeguards are being implemented to alleviate this situation?</p>	<p>incorporated within the site specific FRA as will any potential for downstream pollution.</p> <p>Any application for development will be dealt with in consultation with the Environment Agency. The development will be required to not exacerbate any problems downstream.</p>
<p>Surface water run-off from Great Hockings Lane pollutes the Norgrove fishing pool</p> <p>May be issues with overland inundation during overland flooding due to the close proximity of the Bow Brook and nearby sewer</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. Drainage mitigation measures will be incorporated within the site specific FRA as will any potential for downstream pollution.</p> <p>Any application for development will be dealt with in consultation with the Environment Agency.</p> <p>A flood risk assessment of the site will determine how this can be achieved for this site.</p>
<p>Environment Agency concerns needs to be addressed as a priority before any development is commenced</p>	<p>Agreed.</p>
<p>Site 1 mainly located on a Principal Aquifer. It forms part of the Warwickshire Avon Permo-Triassic Sandstone South groundwater body. This groundwater body is at good chemical status and poor quantitative status. This means that the quality of the groundwater is good however, the aquifer is over-abstracted and this has caused problems with low flows in the watercourses that should be supported by baseflow from the aquifer. Source Protection Zones (i.e. SPZ 1, 2 and 3) cover part of the area relating to Severn Trent Water Ltd's public water supply boreholes.</p>	<p>It is not for any new development to rectify any existing problems as long as it does not exacerbate them. A site specific Flood Risk Assessment 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>The site is not within a flood plain and is classified as Flood Zone 1 therefore satisfies requirements of the Sequential Test.</p>	<p>Noted.</p>
<p>Risk of groundwater and surface water flooding is low across most of the site. May be localised susceptibility in central and north-west areas, but this can be managed and is not a significant impediment to development</p>	<p>Noted.</p>
<p>Following development, overall impermeable areas are expected to increase, but there no reason to suggest that a scheme for provision</p>	<p>Noted.</p>

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and implementation of a surface water regulation (attenuation) system cannot be agreed with relevant Authorities	
Some areas of southern portion of the site are within the Inner and Outer Source Protection Zones (Zones 1 and 2) associated with the boreholes. Construction method statements will be necessary for works within these zones its not anticipated that the boreholes will create a significant constraint. To the contrary, removal of agricultural land and the associated use of fertilizers close to a water abstraction borehole could be beneficial	Noted.
A water main crosses the southern portion of the site from north-east to south-west. The main is 450mm diameter and sits within a ten metre wide easement. It is anticipated to be a substantial supply main serving the Redditch area and diversion is not considered to be a viable option.	Noted.
A preliminary flood risk screening report prepared by Argyll Environmental identifies parts of the site as being susceptible to ground water flooding, albeit it also identifies a similar susceptibility for the whole of Webheath and there is no documentary evidence to support such an assessment.	A Site Specific Flood Risk Assessment (FRA) will need to be completed for this site. Any application for development will be dealt with in consultation with the Environment Agency. The development will be required to not exacerbate any problems downstream.
An application to Severn Trent Water for an area-wide modelling exercise to establish likely reinforcement works has been submitted. Irrespective of outcomes, it is probable that reinforcement works will be carried out on a phased basis	Noted.

KEY ISSUE: Green Belt

Sub Issues	Officer response
Little consideration has been given to the erosion of the "green belt"	The Housing Growth Development Study (2013) has undertaken broad and focussed appraisals of the Green Belt around Redditch considering the purposes of including land in the Green Belt in accordance with the National Planning Policy Framework (NPPF).
Development would cause significant impact on Green Belt. The	The sites that have been proposed have been assessed to have the

Sub Issues	Officer response
<p>proposed development is on Green belt and should not be considered on those grounds alone.</p> <p>There is an implication of “sprawl”. The proposed development area is within a few hundred meters of Tardebigge, which is just a few miles from Finstall, which almost is connected to Bromsgrove; this would have an impact on the South/West elevation from the A448.</p> <p>Development in Area 4 will coalesce with Bentley</p>	<p>least impact, with the best long term boundaries.</p>
<p>The area will lose the strong green belt boundary, the A448, leading to the potential of further development and sprawl into the surrounding countryside.</p>	<p>The A448 is not a Green Belt boundary so it would not be lost as a result of these proposals</p>
<p>If this development is allowed on this land will that allow me to knock down my barn and build 20 affordable houses to contribute towards the so called cause? I am bound by the rules enforced by yourselves and so should you be bound by the same rules.</p> <p>Having been refused planning for a two-storey side extension at this address based on that being considered inappropriate development in Green Belt, I find it inconceivable that the development of Site 1 (Area 4), only 300m from this location, could in any way be deemed appropriate development of Green Belt. Surely the standards by which Bromsgrove Planning have previously ruled would determine that development of this area in this way must be rejected.</p>	<p>Any proposed sites would be taken out of the Green Belt. If a site is within the Green Belt it would be subject to separate planning application and assessed on its merits.</p> <p>The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.</p> <p>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.</p>
<p>The plan clearly states that Green Belt land should only be developed in extreme circumstances then goes on to state that Green Belt Land has been designated as suitable for development.</p> <p>Another intrusion into the Green Belt. This must stop or be controlled very carefully before we have no Green Belt left around Redditch.</p>	<p>The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.</p> <p>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.</p>

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<p>Document used for determining the preferred area refers to strong boundaries to prevent future sprawl, this is irrelevant as there are extremely strong existing boundaries such as Foxlydiat Lane which are being overridden. There is nothing in current policy which prevents the new boundaries being dealt with in the same way as the sprawl continues into additional green belt areas.</p> <p>How could the proposed development not be considered 'urban sprawl'?</p> <p>Risking allowing housing to continue to sprawl into the wider countryside</p>	<p>It is agreed that existing boundaries such as Foxlydiat Lane are strong. However, insufficient land supply in the Borough necessitates the need to use Green Belt land to meet development needs and to reassess existing boundaries.</p> <p>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.</p>
<p>Boundaries mostly weak with no topographical feature to strengthen them. Strongest boundary is the A448 with the rest comprising narrow country lanes, broken hedge lines and a stream.</p> <p>Proposed boundaries require strengthening, yet the site is still supported. Other sites are criticised for poor defensible boundaries and later discounted. This does not demonstrate a balanced approach to the assessment of each area.</p> <p>The conclusion states that the proposal 'uses strong and defensible Green Belt boundaries', yet the previous section highlighted weaknesses with the boundaries.</p>	<p>The western site boundaries comprise a tree-lined watercourse and Cur Lane, which are both considered to be strong boundaries for analysis purposes. Two weak boundaries offer good connectivity between strong boundaries such as Cur Lane and the A448 to enable a suitable development area to be identified.</p>
<p>Foxlydiat included in the Green Belt to "contribute to the open character of the corridor between Redditch and Bromsgrove".</p>	<p>Development in this location would have a less significant impact on the Green Belt 'Strategic Gap' than development in other locations north of the Borough.</p>
<p>BDC Draft Core Strategy 2 paragraph 7.202 Core Policy 22 Green Belt – why has this not been applied?</p>	<p>This is draft policy which will form part of a revised district plan alongside the housing growth proposals for Redditch, This policy clearly states <i>"There will be a presumption against allowing inappropriate development in the Green Belt. Permission for the development of new buildings in the Green Belt will not be given, except in very special circumstances."</i> The requirement to ensure that housing is delivered which meets the objectively assessed need,</p>

Sub Issues	Officer response
<p>REDDITCH GREEN BELT RELEASE TO MEET GROWTH NEEDS – JAN 2013 Para 3.71 continues under E. Development of Green Belt sites should generally be phased late in the plan period after further investigation as to whether they constitute the most sustainable form of development in the local area and represent exceptional circumstances.</p>	<p>combined with the acute shortage of land within Redditch Borough is considered to constitute an exceptional circumstance which necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.</p> <p>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.</p> <p>Although development on Green Belt land should generally be phased later in the Plan period, it is not possible to delay the development of the cross boundary sites until all of the sites in Redditch are developed as Redditch does not have a five year housing land supply without taking cross-boundary development in to account.</p>
<p>HGDS doesn't demonstrate it has taken account of REDDITCH GREEN BELT RELEASE TO MEET GROWTH NEEDS – JAN 2013. Para 2.22 applies to Area 4 but it can be argued that this can be more clearly demonstrated in other examined Areas (also paras 3.71 – 'exceptional circumstances, 3.80 & 3.81 - Greenfield sites should not be brought forward ahead of need')</p>	<p>The Redditch Green Belt Study only considered Green Belt land within the Borough and not the cross-boundary growth areas. Where this Study indicated that Green Belt land within Redditch may be suitable for development, it also identified that land cross-boundary might offer more appropriate and defensible Green Belt boundaries. It was therefore the purpose of the HGDS to identify these boundaries.</p> <p>Although development on Green Belt (or greenfield) land should generally be phased later in the Plan period, it is not possible to delay the development of the cross boundary sites until all of the sites in Redditch are developed as Redditch does not have a five year housing land supply without taking cross-boundary development in to account.</p>
<p>Part of the area could merge with Tardebigge to the north and Banks Green and Upper Bentley to the west.</p> <p>North western and south western 'wings' of Site 1 very intrusive into the Green Belt, the former causing coalescence risk with Tardebigge and Bromsgrove and both representing uncontrolled sprawl and</p>	<p>The extent of Site 1 does not merge with Tardebigge, Banks Green or Upper Bentley.</p> <p>The proposed alterations to the Green Belt boundaries offer strong defensible features such as the tree-lined watercourse, which would not be easily breached and will endure beyond the Plan period.</p>

Sub Issues	Officer response
<p>unacceptable encroachment into the countryside.</p> <p>Impact on Tardebigge is dismissed on the weak basis that the village does not have a defined settlement boundary or village envelope, despite having a clear identity as a community</p>	
<p>Land north of the public footpath was considered in the 2009 RPS/FPCR Study. Concluded it would have more impact on wider countryside than land south to Foxlydiate Lane. Would reduce open gap between Redditch and Bromsgrove from 4.8km to 2.8km, introducing greater coalescence and increasing perception of unrestricted sprawl.</p>	<p>Proposing a Green Belt boundary along the PROW would not have allowed sufficient land to be identified to meet growth needs. However, the extent of Site 1 has a greater capacity than required for 2800 dwellings; this is to allow for natural habitats and green infrastructure to be an integral part of the scheme and for strong defensible Green Belt boundaries to be established.</p> <p>Development in this location would have a less significant impact on the Green Belt 'Strategic Gap' than development in other locations north of the Borough.</p>
<p>Councils' Study failed to assess Green Belt harm. Claiming harm is potentially less than significant in comparison with many others due to the potential to create defining long term boundaries, merely on the basis of appropriate buffers being retained (para 5.68). This weak assessment of harm is backed up by weak assessment that accessibility is good, despite being 4.7km from Redditch Town Centre and 5.5km to the nearest industrial estate.</p>	<p>Para 3.30 of the HGDS states <i>"A key component of the 'Focused Area Appraisal' was the assessment of the Green Belt as well as the defining of appropriate boundaries for each of the potential development areas. The methodology to assess land against the Green Belt purposes and to select defensible boundaries has been derived from an evaluation of other best practice assessments."</i> This approach was consistent for all Focussed Area Appraisals.</p> <p>Distance to the Town Centre and employment areas is not the only determining factor when identifying development locations.</p>
<p>What are the defining features? Why are they not detailed? The site will be visible from the south and from the Bromsgrove Highway so good containment not possible from the north</p>	<p>Defining features comprise a tree-lined watercourse, ridge lines and Cur Lane, for example. All of which are considered to be strong boundaries for analysis purposes, and would not be easily breached and will endure beyond the Plan period.</p> <p>Visible features such as high ridge lines may determine areas within the site that are less suitable for physical development.</p>
<p>Cur Lane an ideal boundary to check urban sprawl, yet in the</p>	<p>Area 8 has not been identified as a preferred location for</p>

Sub Issues	Officer response
focussed appraisal for Area 8 (Bordesley), the use of Storage Lane as a boundary is frowned upon, why the differing opinions when both should be equally judged for this purpose?	development. Storage Lane is a strong enough boundary in Green Belt terms but the extent of development would be more than is required before it reaches Storage Lane. The HGDS has identified that there is a lack of strong defensible boundaries south of Storage Lane. Furthermore, development at Bordesley would have a greater impact with respect to 'strategic gap' reduction to the conurbation than development elsewhere.
Extensive negative aspects in the documents conclusion are forgotten by the last paragraph.	HGDS para 10.2 states <i>"All of the areas are in the Green Belt and all of the areas have constraints and strengths. No area is perfect or ideal. The choice that has to be made therefore is on the basis of the area(s) which most sustainably deliver the required amount of development and associated infrastructure with the least negative impacts"</i> .
Boundaries, particularly man made ones (roads and hedge lines) are defensible only for as long as one wants them to be. Question whether emphasis on these factors deflects attention from the location and nature of the land itself and the development's impact on the surrounding Green Belt.	HGDS para 3.30 states <i>"The methodology to assess land against the Green Belt purposes and to select defensible boundaries has been derived from an evaluation of other best practice assessments."</i> Roads and hedgerows are considered to be strong defensible boundaries in best practice assessments.

KEY ISSUE: Historic Environment

Sub Issues	Officer response
Impact on Norgrove Court (Grade I listed)	Norgrove Court is located about 750m south of the boundary with site 1. There is a strong Green Belt boundary at the south of Site 1 along Pumhouse Lane. It is considered that impact to Norgrove Court is negligible.
Medieval Ridge and Furrow Fields systems still intact. Archaeological surveys have found evidence of medieval field systems, ridge and furrow, crop circles and ancient fishponds.	While part of the historic environment, Ridge and Furrow is not considered to be of such significance to be a constraint to development unless it is associated with scheduled remains. However prior to any development being approved, such remains would be fully assessed and recorded, and where deemed to be of significance would be preserved in situ as part of the developments Green Infrastructure provision.
Report does not mention that the whole of area 4 identified for	Reference to survey work on HE and archaeological assessment to

Sub Issues	Officer response
<p>development is within the bounds of the historic Royal Forest of Feckenham and is an area assarted by Bordesley Abbey in the 13th century. The preferred area for development within area 4 sits between the Bordesley granges of Hewell and Sheltwood and was itself a grange of Bordesley¹⁰. The manor of Tuneshale¹¹ noted in the perambulations of Feckenham Forest in 1280 incorporated an enclosed court and is believed to be located in the vicinity of Holyoakes Farm, as is Eahlmund's Burial ground (see footnote). Holyoakes farm is not listed but is a half-timbered house with timber dating back to the late 1500s and gentrified sometime around 1830 when a brick surround was added. Recent archaeological investigations at Holyoakes Farm have unearthed possible remains of the 14th century Bordesley abbey Grange including a possible vivarium and investigations are ongoing. There are 2 documented medieval pits within area 4¹². Until the dissolution of the monasteries these were held by the abbot of Bordesley who then leased them together with land and farm on a 60 year lease to Thomas Holliock in 1530. One of the pits is located at the top of the concrete path next to the cattlesheds on Tony May's Land. This is the "coppice" you refer to in your report and lies in a field called "Stonepit Piece" and the other is Holyoakes Pit which lies in Pool Meadow¹³. There is a large pool in Holyoakes pit which was created by damming Swann Brook. Remnants of a possible medieval earth dam can still be seen together with a post-medieval brick dam. The appraisal of area 4 also mentions evidence of medieval ridge and furrow fields in this area.¹⁴ A simple desk based archaeological survey would not be acceptable if this area was to be developed indeed the HER report for this area clearly states that the absence of archaeological reports in this area does not mean the absence of archaeology. Therefore time and money would be needed to properly investigate and protect the pits and any associated archaeology around Holyoakes Farm, the former Tynsall field which is the land adjacent to the A448</p>	<p>the standards required by WCC would be advantageous.</p> <p>ACTION: Include reference to the Historic Environment Assessment and potential need for appraisal either in the Policy or ensure there is reference to site level requirements elsewhere in the BDC plan.</p>

Sub Issues	Officer response
<p>opposite Hewell Grange and the Lane House if we are not to lose yet another part of the ancient history of Redditch, Tardebigge and Bromsgrove.</p> <p>¹⁰ http://www.reading.ac.uk/bordesley/Granges.htm. Research in progress on the Granges of Bordesley Abbey</p> <p>¹¹ now extinct</p> <p>¹² see national archives re Bordesley rentals and Earl of Plymouth Archives</p> <p>¹³ Tithe map</p> <p>¹⁴ Della Hooke in Anglo Saxon Charters of Worcestershire identifies and maps the burial ground of Ealhmund an important anglo saxon chieftan of Bromsgrove and potentially one of Bromsgrove's oldest burial grounds.</p>	
<p>Have detailed studies been carried out over and above desktop studies?</p>	<p>The Historic Environment Assessment (HEA) for Bromsgrove District combines county landscape character mapping with Historic Environment Record (HER) data and an outline Historic Landscape Character Assessment to produce 20 distinctive Historic Environment Character Zones (HECZ). This site falls within Historic Environment Character Zone (HECZ) 147 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.</p> <p>ACTION: Include reference to the Historic Environment Assessment and potential need for appraisal either in the Policy or ensure there is reference to site level requirements elsewhere in the BDC plan.</p>
<p>There has been no detailed consideration for the destruction of the "Incredible" (Ordnance Survey 2013) Monarch's Way footpath within the consultation. This historic route will be destroyed throughout the length of the development.</p> <p>Across the proposed site from the A448 is the Saltway, an ancient</p>	<p>The section of the footpath which crosses the site will be incorporated into the green infrastructure network. There have been no objections in principle from the County archaeology team.</p>

Sub Issues	Officer response
<p>Roman road now a public footpath and running west from Curr Lane is a section of Monarch's Way, at 610 miles in total, the second longest way marked route in the country celebrating Charles II's escape after The Battle of Worcester. Both these popular and well walked ways are PRowS – Public Right of Ways – and as such are legally protected.</p>	
<p>Conflict with the character of the local Conservation area</p> <p>Site 1 comes extremely close to the boundary of the Conservation Area and it is inevitable that the disturbance in the form of noise, street lighting and traffic will be detrimental to the Registered Park</p>	<p>The A448 acts as a natural boundary between Site 1 and the Conservation Area. Development would be kept away from the north east corner of the site to avoid any impact on the setting of the CA and the Grade II listed Water Tower</p>
<p>May damage historic or architectural value of listed buildings in the area</p>	<p>Lanehouse Farm, listed Grade II is opposite the site. The NPPF states that "Substantial harm to or loss of a grade II listed building, park or garden should be exceptional" further that "Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss". The proposal is not likely to substantially harm this asset.</p>
<p>There is at Holyoakes Farm, (origin 17th Century "A Thousand Years of Tardebigge "by Margaret Dickens) an on -going excavation conducted by North Worcestershire Archaeology Group after the discovery of a large stone wall buried 4 to 5 feet below present ground level, possibly related to water management and former foundations. This excavation is on- going and records will be updated as new developments are uncovered. "The proposed development could potentially impact on below and above ground archaeological remains."</p>	<p>Acknowledge that there is potential for archaeology at Holyoaks Farm. Reference to survey work on HE and archaeological assessment to the standards required by WCC would be advantageous.</p> <p>ACTION: Include reference to the Historic Environment Assessment and potential need for appraisal either in the Policy or ensure there is reference to site level requirements elsewhere in the BDC plan.</p>
<p>Before written history, archaeology is the only testament to generations of people of whom there is no other record. Archaeological heritage will be lost forever if the proposed Foxlydiate Development of 2,800 houses is sanctioned.</p>	<p>Reference to survey work on HE and archaeological assessment to the standards required by WCC would be advantageous.</p> <p>ACTION: Include reference to the Historic Environment Assessment and potential need for appraisal either in the Policy</p>

Sub Issues	Officer response
	or ensure there is reference to site level requirements elsewhere in the BDC plan.

KEY ISSUE: Housing - Affordable

Sub Issues	Officer response
Placing people with reduced incomes in affordable housing, miles away from facilities and local amenities will be a financial drain in travelling to such facilities.	The provision of affordable housing is a requirement within any residential development proposal. The policy ensures essential services such as a schools, retail and community facilities are within the development therefore increasing its sustainability
Affordable housing should be built as near to the Town Centre as possible.	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. Whilst it is acknowledged that development located in or close to the 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.

KEY ISSUE: Infrastructure – General

Sub Issues	Officer response
There is a refurbished Village Hall in Webheath, no further meeting places are needed. No local GP surgeries, dentists, pharmacies, shops, pubs, sports and recreation facilities in the area. Is there any evidence to suggest the current Webheath residents want additional facilities and amenities?	Development of this scale (2800 dwellings cross bdy) is likely to require new community facilities including doctors, dentists, shops etc.

Sub Issues	Officer response
<p>Even if you could persuade the developers to build shopping, leisure and health facilities in this new development in order to make it sustainable there is the added challenge of convincing traders to invest in and populate the new commercial outlets. This will be especially difficult in a recession.</p>	<p>In the interests of sustainability we would encourage this type of use. There is nothing to suggest it wouldn't be economically viable in this location. The Redditch Retail Needs Assessment (2008) http://redditch.whub.org.uk/cms/environment-and-planning/planning-services/planning-policy/development-plan/emerging-local-plan-no4/evidence-base.aspx#RNA states at paragraph 8.21 "In the context of continuing research into the preferred location for significant housing growth in and around Redditch, there is likely to be scope for the provision of a new district centre (or centres) to serve the needs of the larger new housing areas. Such a centre (or centres) could also help serve local needs in existing areas which currently lack a range of facilities (e.g. some northern and western areas of Redditch). A new district centre may not necessarily be located within the administrative boundary of Redditch. The location of new centres should be carefully considered in the context of the need to serve new housing growth areas and existing housing areas within Redditch which lack easy access to a foodstore capable of serving main food shopping requirements." So there is likely to be a requirement for new provision which can remedy existing deficiencies in this location.</p>
<p>A local shop may be included on the development however people will still travel to the large supermarkets for their main shop</p>	<p>Noted</p>
<p>Elsewhere, such as The Oakalls, promises relating to infrastructure and facilities are made at this stage of planning which are then not fulfilled at the implementation stage.</p>	<p>Facilities and infrastructure that are required will be specified within the Policy and Infrastructure Delivery Plan (IDP) and negotiated through the planning application process.</p>
<p>The development proposes that a community centre and shop be provided. This will become a destination for the populace outside of the developed area - especially if it is closer than facilities elsewhere. This will create traffic into the new development, and this will likely be at already busy times of the day. Little regard has been given to the impact that this additional traffic will have upon the surrounding roads.</p>	<p>A Community Centre and shop is not likely to trigger significant traffic from outside the locality. Predicted traffic numbers have been considered through the Worcestershire County Council Transport Studies. New facilities in this location attracting existing residents would help to improve the overall sustainability of the town.</p>
<p>Mail Postcode areas: Area 4 is served by two sorting offices; this will affect deliveries as they will come from two separate sorting offices,</p>	<p>Carbon emissions from Royal Mail deliveries is an issue for them to consider. Royal Mail are undergoing a nationwide programme of</p>

Sub Issues	Officer response
dependent upon current postcode boundaries, increasing CO2 emissions. Royal Mail should be engaged to appraise the situation.	operational transformation and are required, like other parcel companies, to update their services. Part of their modernisation includes actions to reduce their impact on the environment.
When will new planned infrastructure be phased?	Officers are engaging with infrastructure providers to determine appropriate phasing.
In line with present government policy encourage all employment opportunities to avoid life on benefits being a “life-style” choice. Therefore residents should not be restricted to Redditch for choice of work	There are no restrictions on where residents can work.
<p>A fibre-optic cable follows the line of the gas main Area 3 (southern section) but could be accommodated within a central area of open space.</p> <p>An Oil Pipeline crosses the north-western part of Area 3 (southern section) and will have to be accommodated with any layout.</p> <p>A fibre optic cable, owned by Geo Networks limited, crosses the middle portion of Area 3 (southern section) from east west. For the majority of its length the cable runs within the safety stand-off corridor associated with the high pressure gas main. Joints in fibre optic cables are not welcome and every effort will be made to incorporate that portion of the cable not within the safety stand-off corridor associated with the local high pressure gas main to be retained within public open space/pedestrian areas.</p> <p>The Birmingham Airport Link of the Fawley to Seisdon oil pipeline, operated by Esso Petroleum Company Limited, passes west to east across the middle portion of the phase three site, passes under the A448 and continues across Butler’s Hill to the east. No works are permitted within 3.0m of the pipeline without prior notification and diversion of the pipeline is not a viable option.</p>	This can be considered in master planning of the site these types of constraints have also been resolved in other locations around Redditch where constraints affect the site.

KEY ISSUE: Infrastructure – Education

Sub Issues	Officer response
<p>Local schools are at full capacity</p> <p>There is no readily accessible Middle or Secondary school</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>The middle and high schools in Redditch currently do have spare places (138 places in current Year 5 and 155 places in current Year 9). 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. A number of the middle and high schools in Redditch were previously larger than their current admission numbers, therefore, if necessary, higher intakes could be achieved to provide extra spaces.</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 refresh their requirements to take account of all changes.</p> <p>School provision would be developer funded.</p>
<p>Residents in Webheath can't get places for their children in local schools enabling them to walk to school, cars will have to be used, therefore increasing the Co2 emissions</p>	<p>Noted. Worcestershire County Council has advised that "Webheath First School Academy currently has sufficient places for the number of children living in the catchment area who start school each September. Places cannot be held back for children who move into the area after the closing date so late applications or families looking to move schools at other times may find that there are no places available in their preferred school but will be offered an alternative. The County Council has approved the expansion of Batchley First</p>

Sub Issues	Officer response
	School from September 2014 intake to provide additional school capacity in this part of Redditch. Numbers will continue to be monitored and additional expansions considered as and when necessary.”
<p>The only way to affect obesity and weight problems is for children to walk to school. This housing development will not provide this option.</p> <p>What is not ascertained is how far it is reasonable for children to walk to school.</p>	<p>Walking and cycling is a consideration within the Policy. In addition, a school will be provided on-site. A Travel Plan will be required as part of a Planning Application for the development and a separate Travel Plan will be required for the school.</p> <p>Paragraph 3.19 of the HGDS states that a reasonable walking distance to services and facilities is less than 3km.</p>
3.19 of the Study says that to date, only desktop studies have been carried out to ascertain proximity to schools. This is inadequate for the purposes of this exercise.	There is not considered to be a more accurate way to ascertain proximity than measuring it.
Education aspects inadequately researched. There is no relevant Education material listed in the References in Appendix III.	Appendix III is a Glossary List. There is no published information regarding education that needed to be referenced. Consultation is ongoing with Worcestershire County Council (WCC) regarding infrastructure needs.
Forecasted growth of 96 additional pupils per year is not up to date and subject to the release of 2011 census data	WCC as education authority have indicated that the school provision identified in the draft policy is sufficient to meet the needs of the development up to 2030.
The study referred to two new first schools being required. This is confusing as all other statements in the study refer to a (i.e. one) new first/primary school.	Two new first schools are required to support the growth of Redditch.
The statement in relation to a potential middle school is non-committal and un-researched	WCC as education authority have indicated that the school provision identified in the draft policy is sufficient to meet the needs of the development up to 2030.
There is no reference to natural links to high schools. There are also no feasibility studies into a new high school or “an all through” school.	WCC as education authority have indicated that the school provision identified in the draft policy is sufficient to meet the needs of the development up to 2030.
We agree that for this scale of development a new first school would be required. The school would need space on site to accommodate up to 450 pupils, although construction would be incremental as the development progressed. The County Council expect development to	Noted.

Sub Issues	Officer response
<p>fund 100% of this new infrastructure, including provision of a suitable site, as the school would purely be serving new development. There would be a presumption under current regulations that the new school would be a free school or academy but the County Council would consider other methods of establishing the new school in line with regulations in place at that time. The County Council is not of the opinion that additional middle or high schools are required. However we will be expecting these developments to make appropriate contributions towards extending provision at existing schools as necessary to meet any increased demand.</p>	
<p>Will generate families with school age children in excess of 1,800; even with the promise of a new first School there will be a considerable short fall of availability for school placements at all levels, not just First School level.</p>	<p>WCC as education authority have indicated that the school provision identified in the draft policy is sufficient to meet the needs of the development up to 2030.</p>
<p>Distances to first and special schools relating to Site 1 are closer than for example Area 8. Until the new first schools are provided (likely several years after the first housing occupation) pupils seek places at existing schools. For both middle and secondary schools, Area 8 is closer to existing schools than Site 1. As it appears that no provision is required on Site 1 for middle or secondary education this will increase the need to travel, particularly at peak times.</p>	<p>School infrastructure will be delivered at the appropriate phase. It is acknowledged that travel to Middle and High schools may be necessary, however the Policy requires that sustainable means of travel to facilities such as Middle and High Schools is provided.</p>

KEY ISSUE: Infrastructure – Funding

Sub Issues	Officer response
<p>Who will pay for the infrastructure required to support this development</p>	<p>Generally developers will fund the infrastructure. The IDP will identify the funding streams</p>
<p>How would Redditch B.C. the Police and the Emergency Services cope with the extra services required for thousands of new households?</p> <p>Redditch already needs a new fire station</p>	<p>BDC will have a duty of care for the cross-boundary development located in its District. Emergency services are partly funded through council tax, regardless of which authority council tax is paid to. In terms other local authority expenditures this will either be dealt with via the local authority who collects the council tax or by legal or other arrangement with, or including the neighbouring council.</p>

Sub Issues	Officer response
	Consultation response on behalf of HWFRS indicates that a new capital facility is not required in order to fulfil their statutory obligations. However, WMP will require the provision of a new dedicated police station in Redditch in the long term.
Although some capital investment may be forthcoming from 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.	On-going costs have not been identified; however grounds maintenance etc will be dealt with through council tax and other legal/management arrangements.
If there is truly no alternative to this development for Bromsgrove I would expect to see Redditch negotiate a far higher contribution to facilities and road improvements in the Redditch area and a development richer and self sufficient in facilities.	This is the councils preferred option although alternatives do exist. The policy has been prepared by both councils and it addresses the issue of new development being sustainable and having regard to wider social and other infrastructure issues. Negotiated contributions would be proportionate, necessary and related to the site.
Why are tax payers being made to pay extra for increased infrastructure for houses to be built in Bentley / Foxlydiat when they can be produced a lot cheaper and with far less impact on the environment in Bordesley	Officers are not aware that it is more expensive to build at Foxlydiat rather than Bordesley, nor has evidence been submitted to demonstrate this. The cost of infrastructure is not the sole determining factor on the location of development, although it is a consideration.

KEY ISSUE: Infrastructure – Health

Sub Issues	Officer response
Alexandra Hospital will not cope with additional strain on resources from additional development	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.

Sub Issues	Officer response
<p>GP facilities will not cope with additional strain on resources from additional development</p> <p>No medical facilities in the area for future Foxlydiat residents</p> <p>Health resources already stretched, will have great difficulty in serving total projected Redditch housing growth of more than 6,000 (a new intake of perhaps 15,000 – 20,000 people or an increase of circa 20% - 25% in the current Redditch population).</p>	<p>Consultation with the infrastructure providers including the Redditch and Bromsgrove Clinical Commissioning Group is on-going to determine the infrastructure needed to support development.</p>
<p>NHS website suggests methods of transport to practices but none can be reached by bus from Area 4. It has advised patients to go by car, taxi or to walk a considerable distance to access public transport.</p>	<p>Consultation with the infrastructure providers is ongoing to determine the infrastructure needed to support development. Appropriate bus infrastructure will be required. New public transport services will be provided to serve the area.</p>

KEY ISSUE: Infrastructure – Utilities

Sub Issues	Officer response
<p>Area 4 is furthest away from primary electric, gas, water and telecom services.</p> <p>Area 4 site is too far away from any BT exchange at Headless Cross (BT Exchange site) (WMHX), for what can be considered as a useable Broadband speed for Internet usage, gaming and those that work from home or run businesses from home.</p>	<p>There has been no indication from infrastructure providers that there will be a problem servicing any site around Redditch. Furthermore utility providers have not made representations on specific sites.</p> <p>Consultation with the infrastructure providers including Western Power Distribution and National Grid is on-going to determine the infrastructure needed to support development.</p>

Sub Issues	Officer response
<p>The Foxlydiat/Bentley area currently lies the furthest distance from the primary power supplies and would prove to be one of the most expensive options in terms of providing new 11 kv circuits. In terms of sustainability and deliverability this does not make sense.</p> <p>Study is silent on the availability of electricity to Site 1. No evidence that discussions have taken place with any provider as to capacity available, the need for upgrades of facilities and cost of providing sufficient power.</p>	<p>Electricity supply is not considered to be an issue on this site, this has been confirmed by the infrastructure providers.</p>
<p>No detail about the ability and cost of providing acceptable telecommunications to the development. Broadband provision in particular is very poor in the parish.</p>	<p>Consultation with the infrastructure providers is ongoing to determine the infrastructure needed to support development.</p>
<p>Electricity Services are not an impediment to development. 66kv and 11kv cables can be diverted into an underground route through the development.</p>	<p>Noted.</p>
<p>May be a need for future reinforcement works to the Redditch primary substation, but Western Power Distribution does not consider that this would be an impediment to development</p>	<p>Noted.</p>
<p>Water abstraction boreholes are situated either side of Cur Lane. These do not represent a significant constraint to development. There are a number of water mains, these will have to be accommodated in-situ within development layout. May be necessary to reinforce local water supply network, but this is feasible and viable.</p>	<p>Noted.</p>
<p>A high pressure gas main crosses Area 3 (southern section) and will be accommodated within any layout. Assumed reinforcement of local gas network will be needed, but this is achievable.</p>	<p>Noted.</p>
<p>Western Power Distribution has indicated that existing network has capacity to serve between 200/300 new dwellings without undue alterations or off-site reinforcements</p>	<p>Noted.</p>
<p>Future electricity supplies may involve reinforcement works to the Redditch primary substation but Western Power Distribution stated it cannot consider this in detail until firmer details on the likely rate of increased demand is known and an assessment made of the overall</p>	<p>Consultation with the infrastructure providers is ongoing to determine the infrastructure needed to support development. However, it is not likely that firm details are known until a planning application is received.</p>

Sub Issues	Officer response
demand at the time of requirement.	
The site is clear of overhead and underground cables operated by British Telecom.	Noted.

KEY ISSUE: Landscape

Sub Issues	Officer response
Important ancient area, The Monarch's Way, runs through it and should not be destroyed.	Features such as the Monarchs Way should be encouraged to be incorporated into the development.
Undulating land, which gives the area its character, will be levelled for building. Question whether any thought has been given to screening the planned development from residents.	The levelling of ground is not necessary for development to commence. The sites have been assessed for their ability to integrate into the existing urban area rather than possible screening from existing residential development.
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	Historical and recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.
The area is agricultural land (ranging from 1 to 3b) and development would oppose the aims of enabling local food production. Government's target for sustainability on food is 85% whereas we are currently at only 64%. Developing this area would exacerbate this already poor situation.	Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed housing needs. As the land is of a similar agricultural quality across all focussed areas appraised the loss would be equivalent in any area chosen and therefore it is considered to be only a minor constraint to development.
The countryside in the proposed area contains some land of high landscape sensitivity. Area 4 is defined as Medium/High Landscape Character which has been stated in Bromsgrove's Green Infrastructure report as not preferred development land	The area is located within a medium to high landscape sensitivity risk. This level of risk is similar to the other areas subject to this Focussed Area Appraisal, therefore sensitive design would be required to mitigate the impact on the landscape. Whilst it is preferable for development to occur in areas of low sensitivity, all of the land around the periphery of Redditch is of medium or high sensitivity and therefore the medium sensitivity of this area is not an undue constraint that weighs against the choice of this

Sub Issues	Officer response
<p>The positioning and height of the development site will mean it will be a blight on the landscape from some considerable distance as the land to the south west drops away.</p>	<p>particular area.</p> <p>The boundaries to site 1 have been carefully drawn to help minimise the impact on the landscape. The north eastern part of the area comprises of undulating countryside with two low ridges (130-145m) running perpendicular to the A448, leading up to a high ridge at approximately 150 metres. Beyond this ridgeline the land slopes downhill in a north westerly direction to Tardebigge. Any development to the south of the 150m ridge would be well contained.</p> <p>It should also be noted that the area is well screened from the A448 dual carriageway by virtue of the earthworks created when the road was constructed. Further screening and careful site masterplanning can be employed to mitigate against the effect of views into the site on the higher parts of the site to the far west.</p> <p>The Spring Brook with associated hedgerows and trees provides a strong boundary to the west on the parcels of the development area. This will limit the impact on the wider landscape.</p>
<p>New housing on the Foxlydiate site will be located on an Area of Landscape Protection as revealed in the 1973 study.</p>	<p>Landscape Protection Areas no longer exist as they were derived from a Worcestershire Structure Plan policy that has now been deleted.</p>
<p>Area 4 looks outwards to the Malvern Hills and the Cotswolds. Both have the status of being designated Areas of Outstanding Natural Beauty. It would be interesting to see what the Planning Inspectorate view on this is.</p>	<p>The designated status of these areas is acknowledged however they are a significant distance from site 1 meaning there would be no significant impact upon them. This is not a reason to constrain development.</p>
<p>Site 1 (Foxlydiate) is far too large and should not extend along the A448 beyond Tack Farm where there is a natural visual (hilltop) and transport boundary. The area of 3 fields in the northwest of Site 1 along the A448 beyond Tack Farm must be retained as agricultural land as a minimum.</p> <p>The large part of the proposed development is on a ridge adjoining the current Bromsgrove/Redditch highway – this would make the</p>	<p>Every effort has been made to draw the most defensible and enduring Green Belt boundary. The north eastern part of the area comprises of undulating countryside with two low ridges (130-145m) running perpendicular to the A448, leading up to a high ridge at approximately 150 metres. Beyond this ridgeline the land slopes downhill in a north westerly direction to Tardebigge. Any development to the south of the 150m ridge would be well contained.</p>

Sub Issues	Officer response
development visible for miles around and certainly not in keeping with the policy used to deliver the proposed development.	
The Tardebigge area provides a critical countryside amenity for the whole West Midlands area and encroaching housing into Tardebigge and Bentley will quickly destroy this.	It is not considered that the countryside amenity in the Tardebigge area is any more critical than any other area near Redditch. Green Belt boundaries have been carefully drawn so encroachment will not occur.
Existing options should be fully explored before new farmland is annexed for house building.	20 different sites were considered around the periphery of Redditch all of which were rural in nature. It is considered that the quality of agricultural land is a minor constraint to development. 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
Will spoil natural and existing contours	It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development. Excessive remodelling of land will be avoided.
Will destroy traditional field patterns	A strategy and management plan for Green Infrastructure should include a hedgerow assessment, determining which hedgerows are worthy of retention and protection and therefore protect field patterns.
Landscape valued for recreational purposes	Noted, recreation use is common in all semi-rural areas and therefore in all of the potential development sites.
Development at Foxlydiate would have a detrimental impact on the designated landscape of Hewell Grange.	Comments noted. The HGDS considers landscape issues within HGDS paragraphs 6.2.6 and 6.2.8.
<p>Topography would allow the housing to have no connection to the built urban form and would be clearly visible out into the wider rural landscape.</p> <p>Views from northern elevated part of the site do not pick out the existing urban conurbation and this land is unrelated to Redditch which is well screened by vegetation and topography.</p> <p>From any point on this area and looking in any direction but North all that can be seen is rural landscape so would be exceedingly obtrusive into the wider rural landscape.</p>	Disagree, the HGDS considers topography constraints at para 6.1.78 which suggests that the area could connect to Redditch in terms of its built urban form.
Turning down Foxlydiate Lane, views to the north-east are of	Para 6.1.89 of the HGDS states “ <i>Development on Area 4 could be</i>

Sub Issues	Officer response
<p>unbroken countryside, the housing fronting this road being effectively screened by a thick belt of vegetation. Development could however, be confined here to the two depths of smaller fields without undue visual harm. This land lies at a lower level and is both visually and physically contained by rising land to the north.</p>	<p><i>connected to the existing built form of Redditch in terms of Webheath and there is potential to connect to the A448. Careful design would be required at the A448 and at the north eastern point due to steeper slopes which could be mitigated by strategic landscaping. This is also a consideration at the western edge of the area due to the potential for encroachment when viewed from the west.”</i></p> <p>The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough necessitates the release of sufficient Green Belt land, within Bromsgrove adjoining Redditch.</p>
<p>The southern part of site 1, adjoining development centred on Great Hockings Lane, is prominently rising land, facing north with expansive panoramic views to the Malvern Hills in the west and the Clent Hills to the north. Development here would be highly visually intrusive and would not relate to the existing residential area.</p> <p>Character and sensitivity of the landscape needs to be considered as the site is located on a west facing slope and development should seek to minimise the potential impact on Green Belt.</p> <p>Spring Brook could act as a natural boundary to an extension with additional buffer planting where appropriate.</p> <p>Photograph 53A looks west across Spring Brook towards open countryside which suggests housing development in the foreground could be seen from a distance.</p>	<p>The boundary running along the tree-lined watercourse was identified as offering the greatest amount of visual containment. Para 6.1.87 of the HGDS states “...<i>For the most part the area is sufficiently enclosed so, providing that the area is sensitively developed, the Green Belt impact could potentially be minimised.</i>”</p> <p>ACTION: Ensure that reference to sensitive landscaping is reflected either in the Policy or ensure there is reference to this elsewhere in the BDC plan.</p>
<p>Land at Webheath (Areas 1 and 3) has greatest capacity to accommodate development and Area 2 (south of Cur Lane) has similar capacity to the other potential growth options.</p> <p>Land south of the Bromsgrove Highway (Areas 1 and 2) offers the strongest potential to accommodate development that is carefully</p>	<p>Noted. This has been considered within the HGDS.</p>

Sub Issues	Officer response
designed to respect the setting of the existing urban area, and the sensitivity of the adjacent landscape.	
Area 1 lies in a localised valley which affords it a degree of containment and enclosure by roads and strong boundary vegetation, including a strong belt of trees along the existing urban edge of Webheath defined by Foxlydiate Lane.	Noted. This has been considered within the HGDS.
<p>Land has limited visual receptors which add to the moderate level of sensitivity, in contrast to other Growth Option areas to the north-east of the Bromsgrove Highway and beyond.</p> <p>South of Cur Lane is on a consistently sloping valley side that ranges from 130AOD in the southwest corner to 105AOD in the east. This creates an open aspect to views from the immediate countryside to the west, but protected from wider views due to the number of ridges and localised highpoints that filter views.</p> <p>Area A contained by rising topography to the west and north, limiting views from wider landscape. Localised views from roads and footpaths are available, despite being within a rolling landscape. Wider views limited due to topography and vegetation. Cur Lane is winding and enclosed by hedgerows and trees limiting views in; the same with Foxlydiate Lane where only gaps for field access provide views into the site.</p> <p>Rolling topography and pastoral character the south of the site is more visually exposed, with the appearance of the existing urban edge visible along the ridgeline to the east. This area has a moderate strength of character, displaying some characteristics of the landscape type, therefore would have moderate landscape sensitivity to change.</p>	Noted. These constraints have been considered within the HGDS.
Impact on residential amenity is restricted to existing urban edge and three properties in or close to the site.	Agree.
Noticeable difference in quality of landscape resource from east to west in Area A. North west parts of Area A large scale agricultural landscape with relatively limited visual receptors and landscape	Noted.

Sub Issues	Officer response
character is clearly disturbed and in need of restoration. Southeast is more managed character and smaller scale, with remnant field boundaries and copses retained	
Land in the north western part of Area A has notable capacity as there are few landscape features present and is visible from a limited number of receptors, albeit it is gently sloping from the A448 and more visually exposed than south eastern part.	Noted. These constraints have been considered within the HGDS.
Northern boundary open to views from the north. Would benefit from additional planting to enhance existing hedgerow and provide a strategic landscape buffer	It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development.
In western edge along Cur Lane, views from Monarch's Way should be mitigated by strategic planting to offset possible impact. There is scope to utilise existing vegetation structure to minimise potential impact on the surrounding countryside	Agreed. The aim of the policy is to have an overall Strategy and Management Plan for Green Infrastructure which maximises opportunities for biodiversity and recreation.
Do not believe the text and photographs relating to the Green Infrastructure of Site 1 provide the necessary comprehensive physical description of the area and its relationship to the urban form of Redditch.	Assessment across all focussed area appraisals is consistent. The policy requests that detail is provided to show the site has maximised opportunities for biodiversity and supplemented with an overall strategy and management plan for Green Infrastructure.
Redditch built up area largely surrounded by low hills and ridges c. 120 – 170m O.D. Land drops to c. 70m in the Arrow Valley with Redditch town centre elevated at 125m O.D. Existing housing concentrations therefore well contained in a bowl defined by high ground acting as a robust boundary to urban sprawl. Spilling out beyond this bowl into open countryside would occur if proposals to develop Site 1 agreed.	The site is not part of the Redditch 'bowl' setting and needs to be assessed on its own merits. It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development.
Had a topographical map been included in the study, it would have shown predominant slopes in Site 1 face south and west, i.e. away from Redditch rather than towards it.	Not included in the HGDS, however, contour maps were used during site assessments.
Photographs 79 and 21A indicate a wide sweeping slope where the impact of housing development is difficult to mitigate. It could dominate nearby landscape slopes to the west, creating, at Cur Lane, a jarring interface between town and country. Development on upper	It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development.

Sub Issues	Officer response
slopes would be visible from Holyoakes Lane and High House Lane, which the Study seems to acknowledge.	
Unfortunate that photograph 82B which seeks to define the Spring Brook boundary, looking south, does not show that to the left of the building there is a very steep slope leading up to Webheath. Any housing here would look away from Redditch out towards open country and would be difficult to obscure	It is acknowledged that this land does slope down towards Spring Brook, it should be noted that the Brook lies in a valley. Development on the mentioned slope would be visually contained as the land rises up west of the valley floor.
Despite the suggestion that Site 1 would connect with Redditch via Webheath there is no natural link either to the town or to the area north of the A448	Development in this location will create a balanced community that fully integrates into the existing residential area of Webheath.
Visual impact is subjective: residents' views need more importance as adverse effects are permanent	<p>This is taken to mean a view as in 'perspective' as it is not clear from the representation. The 'right to a view' is not a material planning consideration. Para 6.1.87 of the HGDS states "...For the most part the area is sufficiently enclosed so, providing that the area is sensitively developed, the Green Belt impact could potentially be minimised."</p> <p>ACTION: Ensure that reference to sensitive landscaping is reflected either in the Policy or ensure there is reference to this elsewhere in the BDC plan.</p>
The identity is that of a semi-rural village implies that the decision has already been made	Officers cannot find reference to site 1 development being classed as either semi-rural or a village in the consultation documentation.
Development of part of site 4 may be acceptable between Birchfield Rd, Foxlydiat Lane and Cur Lane but no further north west than the extent of existing development on Birchfield Road, i.e. the garage next to the junction with the A448. This is less unsustainable than the whole of site 4 and has logic in urban form for "infilling"/slightly extending existing development. Retention of trees along Foxlydiat lane (NW side) would screen development, minimizing visual impact	The sustainability benefits of this part of site 1 are noted within the report in the context of the wider site 1. It is considered that all of site 1 is acceptable for housing development, along with site 2, to meet the needs of Redditch to 2030 as they are the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. Retention of trees is considered favourable by both authorities.

KEY ISSUE: Open Space

Sub Issues	Officer response
There will be insufficient garden or amenity land	Provision is unlikely to be insufficient, however the policy could be

Sub Issues	Officer response
	clearer with regards to the level of open space provision. ACTION: Ensure that open space provision for the development is included either in the Policy or ensure there is reference to this elsewhere in the BDC plan
A detailed visual appraisal has been carried out on all 7 areas identified. Topography and natural landscape of the land around the town (Bromsgrove) has a major impact on the prominence of proposed development. The appraisal identifies that Bromsgrove town effectively sits in a bowl and it is imperative to position development to ensure it does not 'spill over' the sides of the bowl and become unnecessarily visible from the wider countryside. This obviously is not taken into consideration in developments which are far enough away from Bromsgrove not to be seen?	This would not have been taken into account as this study has its own strategic objectives. One of which is (Obj. 6) to minimise the loss of Green Belt and areas of high landscape quality.

KEY ISSUE: Rural Economy

Sub Issues	Officer response
As part of the rural economy pheasant shoots are routinely held in the woodland and fields adjacent to the pool at Holyoakes Pit. Pheasants and wildfowl are bred and enclosed in woodland around the pool.	Regardless of where the development goes around Redditch there will be a displacement of rural activities. It is uncertain how much pheasant shooting contributes to the rural economy.

KEY ISSUE: Sewage Treatment

Sub Issues	Officer response
Sewage treatment will increase carbon emissions	This is agreed; however sewage treatment is necessary to support development.
Pumping sewage to Spernal is not a sustainable option	There are many aspects to sustainability that need to be considered and this is only one. 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

Sub Issues	Officer response
	<p>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.</p> <p>Another option would be to provide a new pumping station. The estimated cost for this would be £100,000 plus annual operating costs.</p>
<p>Providing a pumping station for sewage removal would be contrary to the RBC Climate Change Strategy</p>	<p>There are no specific actions in the RBC Climate Change Strategy regarding sewage.</p>
<p>Development will causes contamination to Curr Lane Wells, public water supply and water gathering grounds</p> <p>Water quality of wells will be prejudiced.</p>	<p>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 (STWL).</p>
<p>Water runoff/ flooding and sewage issues have not been addressed – I moved from an address off Foxlydiat Lane partly due to the lack of response from Redditch Council/ Severn Trent to sewage that frequently poured on to the road and ‘green area’ used by children following previous development work – both parties blamed the other.</p>	<p>A site specific flood risk assessment will be needed to determine level of flood risk. This work is currently being carried out in line with Environment Agency and STWL requirements.</p>
<p>If the option to use the Priest Bridge sewage treatment works is implemented there will be an unacceptable increase in the operational outflow into Bow Brook. Should surface water enter the foul water drainage system there will also be an increase in the outflow from the Priests Bridge directly into Bow Brook, at a point immediately upstream of communities in Saleway Parish</p>	<p>Environment Agency and STWL will determine what is acceptable outflow into the Bow Brook and from Priest Bridge when designing the scheme.</p>
<p>No clear and binding requirement to handle additional sewage and run-off water in an environmental friendly, low cost manner.</p>	<p>STWL are legally obliged to provide infrastructure to handle sewage however the Councils are unable to influence how this is managed.</p>
<p>Severn Trent consider that the appropriateness of locations for development, in order of preference to build would be:</p> <ul style="list-style-type: none"> • 1st – Bordesley • 2nd – Brockhill • 3rd – Foxlydiat • 4th – Webheath 	<p>Preferences of infrastructure providers is not the sole determining factor in site choice, all of these sites are able to be served by STWL.</p>
<p>Area 4 paragraph concludes with: <i>“including a new/first primary school. Sewerage issues would also need to be investigated further.”</i></p>	<p>Agreed, this is an inconsistency within the Report, it is acknowledged that both areas could be costly.</p>

Sub Issues	Officer response
<p>Whereas Area 8 concludes: <i>“which could be costly.”</i> If it is costly for Area 8 it will be more costly for Area 4 when the school and sewerage issues are included. Why was the phrase <i>“which could be costly”</i> not included in conclusion to Area 4.</p>	
<p>There is a 525mm (21 inch) diameter foul sewer through Feckenham to Priest Bridge, runs parallel to Bow Brook for most of its length. It performs satisfactorily but during wet weather the sewer may be affected by ground water infiltrating into the pipe, reducing its capacity in wet periods.</p>	<p>Noted, this is a maintenance issue for STWL. New development cannot pay to rectify existing deficiencies but should not exacerbate any problem.</p>
<p>Both options for sewerage would be problematic due to the location on the existing sewerage system. Extensive sewer upgrading work would be required for both options and would take several years to provide.</p>	<p>Both options are technically possible; the chosen option will need to be delivered at the appropriate time to support development.</p>
<p>Source Protection Zones (SPZs) have been modelled to protect specific sensitive locations such as springs, wells and boreholes used for potable supply. They define the source catchment area i.e. the area underlain by groundwater which will eventually be drawn to that borehole or well. Generally, the closer a polluting activity or release is to a groundwater source the greater the risk of pollution (SPZ1 is the inner zone and therefore the type of development and activities that can take place within this zone are restricted). The site is therefore located in a sensitive hydrogeological setting. Further guidance on activities within SPZ1 and topics including: sewage works; groundwater flooding; sustainable drainage; waste storage; fuel storage; groundwater resources etc. is set out in Groundwater Protection: Principles and Practice document (GP3), available via: It's essential these principles are adhered to (where relevant) when detailed proposals are produced, in protecting controlled waters and meeting WFD objectives. Development should be located and designed appropriately and consideration should be given to pollution potential of activities. Where infiltration SuDS are proposed for anything other than clean roof drainage in a SPZ1 we require a risk assessment to demonstrate that pollution of groundwater would not occur. This will also require approval from the SuDS approval body</p>	<p>Agreed, the groundwater protection principles will be incorporated into the Policy as appropriate.</p> <p>ACTION - incorporate these principles into the Policy as appropriate</p>

Sub Issues	Officer response
<p>(SAB), when established, to ensure they follow the criteria set out in the SuDS national standards (when published), including standards for water quality, design and maintenance.</p> <p>Design of infiltration SuDS schemes and their treatment stages needs to be appropriate to the sensitivity of the location and subject to risk assessment considering the types of pollutants likely to be discharged, design volumes and the dilution and attenuation properties of the aquifer. A supporting risk assessment and careful design would be required to show that SuDS schemes in SPZ1 will not pose an unacceptable risk to drinking water abstractions, for the use of infiltration SuDS to be acceptable.</p>	
<p>Pumping involves delays and faults with creation of leaking pressure main, giving rise to toxicity.</p>	<p>STWL have advised that Pumping stations are basically large manhole type chambers with pump located in a sump in the bottom. When the level of sewage in the sump reaches a pre-defined level, the pumps switch on, and when the sump is empty the pumps switches off. Within the control equipment there are 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.</p> <p>The pressure mains for the pumping stations are designed based on the amount of sewage being pumped, the length of the pressure main and the height the sewage is being pumped. This then determines the type and strength of pipe used, and during construction this is pressure tested to ensure it is leak free. Under normal conditions pressure mains do not leak and so will not cause ground contamination but as will all assets there is a risk of failure, especially as they get older. As pressure mains are under pressure, if they do</p>

Sub Issues	Officer response
	spring a leak they will result in a burst which would be visible at ground level (also the alarm systems should pick up the fact that the pumps are pumping at a lower pressure). Consequently the risk of toxicity from a sewage pressure main is no greater than a normal gravity sewer.
Waste from Webheath Sewerage Farm will need to travel over Foxlydiate Lane or Heathfield Road.	STWL have advised that Webheath sewage treatment works was abandoned many years ago and replaced with a pumping station off Church Road. This pumping station now pumps the foul sewage to a sewer in Springvale Road (close to the play area adjacent to 26 Springvale Road) and then flows by gravity through the main Redditch sewerage network to Spernal sewage treatment works. Flows do however pass through the northern end of Foxlydiate Lane before passing under the Bromsgrove Highway and on towards the main trunk sewer in the Arrow valley.
Site is clear of any existing adopted or private sewers.	Noted.
Subject to phasing development and following improvement works, adequate capacity can be made available at either Priest Bridge and/or Spernal sewage treatment works.	Noted.
May need improvements to sewerage infrastructure system which the water authorities will have a statutory duty to resolve	Agreed.
Contours suggest foul water will be discharged via on-site gravity sewers to new pumping stations and pumping mains to a suitable outfall sewer	This is consistent with what STWL and Developers have suggested and sewerage issues can be resolved.
Severn Trent Water has welcomed early discussions regarding foul drainage and potable water supply.	Noted.
Further modelling will be undertaken to determine current capacity of existing networks and timescales for implementing upgrades required to accommodate the development.	Noted.
Adequate consideration has not been given to provision of sewerage services in Area 1. The statements " <i>The most sustainable and cost effective means should be implemented which could make the timescale for infrastructure delivery a lengthier process than delivering short term solutions</i> " followed by " <i>However short term solutions could be provided in the interim with a view to more</i>	It is considered that short term solutions are essential to enable development to occur. STWL are being consulted in order to develop the most suitable and sustainable solutions both in the short term and long term, with the long term solution being a more sustainable option.

Sub Issues	Officer response
<p><i>sustainable solutions in the long term</i>” can be seen as indicators of a wish to take the most expedient option which is, in effect, to do very little in relation to long term solutions. This is not planning for sustainable development.</p>	
<p>One might have expected the Outline Water Strategy Report would have addressed possible cross boundary development west and south of Foxlydiate. Site 1 was not included in the list of strategic sites or on the relevant maps and no information was put forward about it.</p>	<p>The cross-boundary sites were unknown at this stage and therefore it would not have been possible to consider any of the cross-boundary sites within this study.</p>
<p>Addition of 6,000 to 8,000 people from Site 1 means the costly gravity drainage system needed. Delivery would inevitably impact on phasing of development. Feasibility studies and assessment of likely cost to Severn Trent customers are absolutely necessary.</p>	<p>Agreed, this further work is being completed. Development is likely to be phased.</p>
<p>Though sewage treatment is not envisaged by Severn Trent Water as being a constraint to proposed developments within Redditch, their 2012 report does not mention the wider Bentley Pouncefoot area.</p>	<p>This report was prepared by STWL and therefore is not the responsibility of the Councils.</p>
<p>With the other reports mentioned in this section it does not comment on the Water Source Protection Zone (SPZ) underlying much of the proposed development area. “Planning for Water in Worcestershire” 2011 states <i>“it is critically important to consider such areas when planning development in Bromsgrove District since the ground water zone is under protection due to human consumption.”</i> The extent of the SPZ is marked on Environment Agency “Groundwater” 1:20,000 map for the area. Difficult to understand why reference not made since it may limit SuDS techniques which could be used.</p>	<p>Noted, the groundwater protection principles will be incorporated into the Policy as appropriate.</p> <p>ACTION - incorporate Environment Agency Guidance principles into the Policy as appropriate</p>

KEY ISSUE: Site constraints

Sub Issues	Officer response
<p>The document suggests that the scrap yard at the junction of Dagnell End Road and Icknield 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</p>	<p>Webheath ADR has not been subject to this appraisal, however, this issue will be considered as part of the Webheath Strategic Site response to BORLP4 consultation.</p>

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?	
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KEY ISSUE: Sustainability

Sub Issues	Officer response
Site is at least an hour's walk from either Town Centre & facilities like shopping centres, bus stations, trains, schools, medical facilities.	See above for schools. It is agreed that it is approximately an hour's walk from Foxlydiate to the Town Centre. Other sites are comparable in terms of their distance although it is acknowledged that the Foxlydiate site is furthest from the town centre in terms of walking. However the policy is attempting to create sustainable development with onsite provision of community and other facilities and good connectivity to the town centre, schools etc.
No employment in the area for future Foxlydiate residents	The emphasis is to provide employment opportunities within and around Redditch's urban area and with good public transport connections.
Redditch cannot offer sufficient opportunities for employment for this amount of additional housing development	The quantum of employment need is identified and provided for in the emerging plans for Redditch, Bromsgrove and Stratford-on-Avon Districts.
It is not realistic to think that those who live in the new development will only work in Redditch or Bromsgrove and will not commute to Birmingham and beyond for work.	This is agreed and acknowledged in the evidence base. However we are trying to create a balanced community so it's important that the evidenced amount of employment growth as well as housing growth is located around Redditch.
No guarantee that transportation to Foxlydiate estate will be sustainable. No guarantee that new business will open to support the development in the area.	<p>The policy states <i>“Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both 1 and 2 which make full use of new and existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch’s Way in 1.”</i></p> <p>The policy requires that provision for such facilities is made; the market will dictate how these facilities will be used.</p>

Sub Issues	Officer response
	ACTION: Ensure that the policy provide more detail of the level or scale of community and retail facilities required in the site
Concerns about the distance a fire engine would have to travel to reach a serious incident (fire or road traffic collision) in Webheath or Foxlydiate	The response from the Fire and Rescue Service does not raise any concerns. Previous discussion has indicated that a Fire Station located to the north of the town would adequately meet response times to the north-west cross boundary arc.
Increased car journeys is not sustainable	This issue is not particular to this site only. It is acknowledged any growth in the population will increase car usage. The Policy requires improvements to passenger transport to encourage modal shift.
People will not travel to Redditch to shop, the demographic of this site attracts a higher ACORN rating (social economic status profile) they are more likely to travel to shopping locations where higher-end quality shops and boutiques exist, such as Touchwood, Merry Hill, The Bullring.	It is not possible to determine the demographic of the site, it is intended this site will meet a broad spectrum of housing needs and therefore a range of socio economic requirements.
There are no travel destinations identified to the west of Redditch	It is assumed the respondent is referring to the 'Travel Destinations from Development Areas' Map from Consultation. This map shows that Bromsgrove is west of Redditch and a significant travel destination in terms of meeting the HGDS Strategic Objectives.
People should travel under 4 miles to employment.	This is not a planning policy matter. Planning cannot dictate where people choose to live in relation to their location of work.
Given that Webheath has access issues with poor infrastructure, how can it be easier to connect than Bordesley? If there is a major dependency on access issues being resolved, why is this not seen as a major stumbling block?	Access is direct to the Strategic Road Network for all the focussed site areas. Site 1 is not dependent upon the same access arrangements as Webheath.
Study accepts Site 1 is a greater distance from Redditch Town Centre than several other areas but implies this distance is offset by availability of different routes into the centre. Fail to see the logic of this argument when translated into the perceptions of potential inhabitants of the area.	It is acceptable for the study to make reference to multiple routes being available to the Town Centre where they exist. It is not clear how perceptions of potential inhabitants may affect this.
Development at Site 1 would lead to a disproportionate increase in journeys across town to work which would add to its unsustainability.	This comment assumes all future residents will work on the east of the town, which would not be the case.
Study suggests development in Site 1 would stimulate provision of additional local facilities in Webheath. The extended shape of the site and topography would not necessarily facilitate access to Webheath	The site would facilitate access onto the Strategic Road Network, via a range of transport options, and would also provide access to existing facilities in Webheath should the residents choose to do so.

Sub Issues	Officer response
by alternative modes of travel. Likely that residents would use private car for local journeys and thus would not necessarily focus on Webheath.	
Suggestion that regeneration of Bromsgrove town centre might be assisted by development in Site 1 is speculative than evidence based. If one considers the draw of Merry Hill, Worcester and Solihull, an increase in online shopping and retail and cultural benefits of Birmingham it is only in smaller scale cultural and leisure activities that Bromsgrove might benefit. Redditch however is nearer.	Whilst it is difficult to prescribe how or where people will prefer to shop or access facilities, because the growth locations are all adjacent to Redditch it can be presumed that the majority of residents in any area will use Redditch facilities, however there is a possibility for opportunities for Bromsgrove Town Centre use with Site 1 being taken forward as an allocation just because of its location.

KEY ISSUE: Transportation – Funding

Sub Issues	Officer response
Widening the roads and adding pavements would have to be considered if these roads were to be used by those living at the new development in area 4. The capital cost assumed will be borne by the developers, but industrial size agricultural vehicles, herds of beef cattle and silage tankers use these lanes therefore frequent damage to new roads, new kerbs and new pavements is inevitable. The cost of repairs would need to be borne by the council. Adding pavements and widening the roads would encroach into the field ditches which are used as emergency flooding conduits.	This response has been sent to WCC for comment

KEY ISSUE: Transportation – Public Transport

Sub Issues	Officer response
Sites to the north of Redditch are nearer to the rail network	It is agreed that sites to the north of Redditch are closer to the train station and rail links. Other responses deal with sustainable travel patterns.
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	It is envisaged that additional bus services will access existing and new residential areas and not use rural routes.
Whether or not increased public transport opportunities were to be offered, it is noted in a recent report that most car owners would	The Choose How You Move Project Manager has advised that the Choose how you move in Redditch baseline report identified that, prior

Sub Issues	Officer response
choose to drive.	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.
A comprehensive network of buses travelling to and from Redditch and Bromsgrove town centres including the 2 railways stations, leisure centres and schools and running at least every 20 minutes during rush hour and extending to at least a late bus at 23.00hrs would be the minimum required to coax even a small proportion of the total new population out of their cars. This is an unrealistic expectation in a time when the council has limited and diminishing funds.	It is envisaged that bus services will be introduced to encourage patronage and meet demand. Nothing suggests that increased bus services would be unrealistic as a result of this development.
Buses do not coincide with rail departures / arrivals, can add 30 mins to journey time by waiting for connection, discouraging use of public transport	This issue is not unique to this site. This response has been sent to WCC for comment
Blue Diamond bus service operated in this area may be subject to a monopoly investigation as there is no rival operator, which will result in unfair pricing and degraded routes – running only those that are profitable. Bus fares will be high.	Bus Services are operated by private companies, planning policy cannot influence the way they are operated.
Concerned over rumours of a bus route being routed along Great Hockings Lane	Great Hockings Lane is not wide enough to accommodate a bus route. This response has been sent to WCC for comment
No clear and binding (on the developers) requirement to deliver sustainable transport in any form	Disagree, the policy states “ <i>Significant improvements in passenger transport will be required resulting in integrated and regular bus</i>

Sub Issues	Officer response
	<i>services connecting both sites to key local facilities. In particular, services should be routed through both 1 and 2 which make full use of new and existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch's Way in 1."</i>
<p>In section 6.1.25 the Study suggested potential to divert 143 service into the area. This is an hourly service to Bromsgrove and may be a viable option for a bus operator; however an hourly service to Bromsgrove will not adequately serve this area. A development of 6,888 population and 40 % affordable housing will certainly require a bespoke bus service route with a frequency in the region of 5-10 minutes rather than extending existing services.</p>	<p>This response has been sent to WCC for comment</p>
<p>Halcrow have previously reported on Draft Core Strategy 2 on behalf of Heyford Developments Limited. Is this conflict of interest</p>	<p>WCC have procured transport consultants to complete work on an on-going basis. This procurement procedure was completed in advance of potential development sites being identified.</p>
<p>An entirely new bespoke (bus) service will be required wherever the development is located and therefore no area is more favourable than another.</p>	<p>This is incorrect, Sites 1 and 2 would not require a bespoke service.</p>
<p>Development will deliver high quality, high frequency bus services with target frequency of 10 minutes. These will link to Redditch and Bromsgrove town centres and train stations. Routing is a matter for detailed consideration but it is likely that services will run through Webheath therefore benefit existing residents. Layout of each phase will ensure all dwellings are located within 250m of a bus stop</p> <p>Modal shift to road based public transport will not occur unless a regular, preferably 10 minute frequency bus service is available from an early stage. No evidence provided to indicate that bus service operators have been engaged in discussion about extending services into Site 1 or provision of new or the level of subsidy required until a service became viable</p>	<p>This response has been sent to WCC for comment</p> <p>Action – Amend Policy to require that all dwellings are located within 250m of a bus stop.</p>
<p>Document states there are 3 bus services running within 1km of the site, but fails to state that the nearest bus stop is 1.4km from the centre of the site, or 1.8km from the furthest point of the site, which is the measurement basis used in other appraisals.</p>	<p>Additional bus stops will be provided within any development site to ensure that all dwellings are located within 250m of a bus stop.</p> <p>Action – Amend Policy to require that all dwellings are located</p>

Sub Issues	Officer response
	within 250m of a bus stop.
It is considered satisfactory that there are bus stops within 1km of the site. In fact the nearest stop is 1.4km from the centre of the site, if using similar measuring criteria to that for Area 8. Inconsistencies in focussed appraisals between areas are significant.	The HGDS simply states that there are 3 bus services running within 1km to the north east of the area. The central point of each site was used as a consistent methodology for measuring distances (unless otherwise stated). In addition, bus stops will be provided within any development site to ensure that all dwellings are located within 250m of a bus stop. Action – Amend Policy to require that all dwellings are located within 250m of a bus stop.
Redditch Station is approximately 4.5 km from Site 1 so if car travel is to be reduced, improved bus connections and cycling routes will be necessary.	The policy states “ <i>Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both 1 and 2 which make full use of new and existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch’s Way in 1.</i> ”
Integration of modes would be encouraged by provision of “cycle and ride” facilities at Redditch Station	Improvements are being sought through the Infrastructure Delivery Plan in relation to cycle parking, improved signage to encourage trips to the railway station and cycle storage at the railway station.

KEY ISSUE: Transportation – Road Infrastructure

Sub Issues	Officer response
Would all traffic (i.e. 6000+ cars) have direct access onto Church Road from the Foxlydiat development?	The primary access is likely to be on to the A448, additional accesses are yet to be determined.
Regardless of what road infrastructure is in place for the larger site, people will use the nearest, most convenient access	It is anticipated that the most convenient access points will take traffic directly onto the Strategic Highway Network.
Development at Foxlydiat should only be accessed via the Bromsgrove Highway so no additional traffic is routed through the existing Webheath development	
Current road network/ country lanes (Cur Lane, Copyholt Lane,	The development will require a new road network to accommodate the

Sub Issues	Officer response
<p>Coalash Lane, Holyoakes Lane, Black Lake Lane, Angel Street, Foxlydiat Lane and Crumpfields Lane, Birchfield Road, Heathfield Road, Middle Piece Drive, Downsell Road, Blackstitch Lane, Hewell Lane/ Alcester Road, Finstall Road, Pikes Pool Lane, Blackwell Road, Green Hill, Old Burcot Lane, Spirehouse Lane) inadequate to accommodate additional traffic volumes.</p> <p>Many lanes already hazardous, especially when used as short-cuts by people unfamiliar with their hazardous nature: many stretches only wide enough for one car; limited passing places; prone to flooding hence riddled with pot holes & in very poor repair; used by large & slow-moving agricultural vehicles hence often covered with mud & dangerous for heavy braking.</p> <p>Concern over safety of roads, the road system is made up of 'lanes', will put residents at risk.</p> <p>Increased traffic along lanes is leading to damage and erosion to the roadside and destruction of grass verges and ditches which is causing unnecessary flooding of the lanes.</p> <p>Bentley and Stoke Prior lanes will be used as shortcuts to Droitwich and motorway junctions, and from further afield into Redditch (Aston Fields).</p> <p>Lanes will be used as short-cuts from the large development; traffic will be met by heavy and frequent farming vehicles.</p> <p>Blackstitch Lane used as a 'rat run' by existing Webheath residents due to congested nature of Heathfield Road.</p> <p>Norgrove Lane and Foxlydiat Lane too narrow to accommodate builders HGVs and additional traffic.</p>	<p>volumes of traffic envisaged.</p> <p>This response has been sent to WCC for comment</p> <p><u>ACTION: Incorporate new criteria “All proposals should discourage unintended through traffic (rat runs) within the development site and/or between sites;”</u></p>

Sub Issues	Officer response
<p>Would introduce more than 4200 vehicles to the locality, inconceivable that a substantial number would not find their way onto the narrow lanes</p> <p>Highways Officer could not confirm that measures to prevent excessive use of the lane network in this vicinity would be effective, and acknowledged that development would result in extra traffic on the lanes.</p>	
<p>Heathfield Road is busy due to the location of the shop/ post office which is used by local residents.</p> <p>Heathfield Road is almost a one way system.</p>	<p>New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p>
<p>Speeding vehicles – Sillins Lane, Church Road, Foxlydiate Lane, Cur Lane, Blackstitch Lane, Crumpfields Lane</p>	<p>This response has been sent to WCC for comment</p>
<p>Accident 'black spot' at Blackstitch Lane/ Middlepiece Drive/ Heathfield Road</p> <p>Blackstitch Lane will be a main artery and it is not up to the task despite anything that has been said to the contrary.</p> <p>Can we have a clear statement about this dangerous site? Do the council/planners/ inspector /developer consider it to be safe?</p>	<p>This response has been sent to WCC for comment</p>
<p>Development at Foxlydiate would force additional traffic onto Plymouth Road or Coldfield Drive, both of which require transit through Headless Cross traffic lights which is already a major bottleneck.</p>	<p>The junctions which have been identified as having the greatest potential for increased traffic movements have been modelled in the Highway Assessment.</p> <p>This junction was not considered to have sufficient increased impact from development across the Borough. The modelling for this particular junction has been priced at approximately £3000 at a cost to the Council. The decision has been taken not to proceed with this work by Planning Advisory Panel.</p>
<p>Windsor Rd is a bottleneck with the bridge for Birmingham area traffic, A441 north of Sainsbury's is a bottleneck</p>	<p>New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where</p>

Sub Issues	Officer response
<p>Parking congestion along Heathfield Road, Downsell Road, Springvale Road and at Webheath First School will be exacerbated with increased traffic numbers</p>	<p>improvements to the road network are required. New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p>
<p>Increased traffic will cause congestion at M5 and M42 motorway junctions.</p> <p>Lydiat Ash junction (M5 J4) already solid at rush hour.</p> <p>Increased traffic will cause congestion at Burcot, Lickey End and Tardebigge.</p> <p>Congestion unlikely to disappear, especially junctions at peak times. Added volumes of traffic would be seen on alternative route of the B4096 Hewell Lane, through Tutnall and Cobley and Burcot to Lickey End to junction 1 of the M42 or Birmingham Road for access to M5 J4. Drivers avoid Bromsgrove by taking Cur Lane into Copyholt Lane and other lanes to the west to access to M5 J5.</p> <p>Bromsgrove has its own housing growth needs and this will increase commuting traffic by a similar amount of cars over the next five years, potentially increasing commuting traffic to around 6-8000 cars within this time scale.</p> <p>Bromsgrove bypass should go all the way to the M5.</p> <p>No improved transport links to the east of Redditch i.e. to London and Coventry. Discussions should be undertaken with Warwickshire Council</p> <p>Birmingham Road from Lickey End to Bromsgrove highway already seriously overloaded with standing traffic several hours per day, as is Birmingham Road in Bordesley from the end of the Alvechurch By-</p>	<p>New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p> <p><u>ACTION: Incorporate new criteria “All proposals should discourage unintended through traffic (rat runs) within the development site and/or between sites;”</u></p>

Sub Issues	Officer response
<p>pass to the Sainsbury roundabout. These two bottlenecks will be completely swamped unless new roads are provided prior to developments. If not, Hewell Lane from Lickey End to Foxlydiate Roundabout, already in very poor state and has a poor accident record, will become more of a rat run.</p>	
<p>Increased traffic will impact on A448/A38 roundabout junction at Bromsgrove and Morrisons junction at Winyates. What studies have been completed to alleviate this?</p> <p>Land between Morrisons and Mappleborough Green has been built on so land is not now available to dual this section of road even though provision was made several years ago.</p>	<p>Morrisons Island was one of the junctions assessed through the Halcrow transport modelling. It is not listed as one of the improvements in the Transport Schemes document.</p> <p>Road reserve has been removed (BORLP3), but the land has not been built upon. This stretch is not identified as being in need of improvement.</p>
<p>New interchange required for site access to existing road system, causing significant disruption for residents</p>	<p>This is a temporary matter. All development causes a certain level of disruption to existing residents during construction, however this can be controlled through planning conditions.</p>
<p>Widening roads will be difficult and distressing i.e. Church Road and Foxlydiate Lane as some properties front the road directly.</p> <p>Claims that roads will be 'improved' simply translate as 'widened', this means speeds and traffic volume will increase.</p>	<p>This response has been sent to WCC for comment</p>
<p>Key roads in Webheath do not benefit from modern safer design that encompasses an enhanced understanding of safe road system design. Other parts of Redditch has avoided through roads that do not have driveways that exit directly onto carriageways carrying traffic that is travelling through the area.</p>	<p>Accept that there is a difference between the road systems in the former New Town and other parts of Redditch's urban area. New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p>
<p>Have Highways or developers done a Risk Assessment about increased traffic and the potential increase of accidents?</p>	<p>This response has been sent to WCC for comment</p>
<p>Roads visibly damaged as a result of the volume of traffic</p>	<p>This is a Highways Maintenance issue.</p>
<p>More traffic detrimental to local residents particularly children.</p>	<p>This issue is not particular to this site only. It is acknowledged any growth in the population will increase car usage.</p>
<p>Increased traffic noise and pollution.</p>	<p>This issue is not particular to this site only. It is acknowledged any growth in the population will increase car usage.</p>
<p>Increased traffic would also include more vans and lorries due to the</p>	

Sub Issues	Officer response
growing trend for internet shopping	
There are humped back bridges some with weight restrictions.	Noted.
<p>More Redditch commuters travel to work to Birmingham, Webheath is geographically furthest from Birmingham or public transport links than other areas.</p> <p>Quickest route to M42 is not via A448, as most people know or would get to know, because these houses will inevitably be purchased from out of town people commuting to Birmingham (knock on doors on local new sites to gain evidence), and drivers will instead cut through Burcot or Bordesley.</p> <p>How does Foxlydiate / Bentley site, planned to feed onto the A448 "stop migration away from Redditch"?</p>	<p>The most popular employment destination for Redditch residents, are locations within Redditch. All focussed area appraisal sites link onto the strategic road network.</p>
<p>To maintain rural character and protect conservation area and villages adjacent, ensure that access to Gypsy Lane was restricted to pedestrians and cyclists with vehicular access to and from new development only via a new entrance and exit from the A448.</p>	<p>The exact details of the new transport arrangements will not be known until a detailed Transport Assessment is undertaken.</p>
<p>Buntsford Park likely to be the next accident black spot due to additional traffic volumes. Cars parked on both sides of the road making vision very poor.</p>	<p>New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.</p>
<p>If no more than 200 dwellings can be accessed off a single road, how many access points would development in this location create?</p>	<p>200 dwellings is the trigger for a through route as opposed to a cul de sac. Any road network would be designed in accordance with the Highway</p>
<p>It is not clear who would finance these works.</p>	<p>The developer of any site would be required to undertake the works necessary to mitigate the impacts of the development on the existing highways and for the provision of a range of necessary new transport infrastructure, including sustainable transport.</p>
<p>The A448 Bromsgrove Highway is subject to road traffic crashes as a result of icing to the carriageway</p>	<p>This response has been sent to WCC for comment</p>
<p>The 'Identified Highway Schemes Required' if development proceeds either in Area 4 or Area 6 indicates that some 34 No junctions will need to be improved to allow traffic to move freely and safely. To</p>	<p>The upgrading of existing junctions is a typical requirement on the back of developments in any area. In any case the list of schemes are not only related to sites 1 and 2, they also relate to improvements</p>

Sub Issues	Officer response
complete all would be very costly, time consuming and disruptive to existing traffic.	needed as a result of all developments across the Borough, and outside of the Borough.
Slideslow roundabout likely to be at saturation point due to existing heavy flows of traffic, improvement schemes would not be productive.	The transport schemes identify that this junction will require enhancements as a result of development pressure from all developments across Redditch and Bromsgrove.
<p>A38 between Stoke Heath and Lydiate Ash has a large volume of traffic already, it's unlikely that improvement work would improve the traffic flows</p> <p>Accidents on M5 and M42 cause significant disruption to A448 and A38 because they are used as a diversion. A38 traffic backs up to Slideslow Roundabout which in turn gridlocks traffic on the A448 and traffic backs up from Bromsgrove to Foxlydiate and onto the A4189 and beyond.</p> <p>Development likely to exert main pressure on A448, Slideslow roundabout and A38 northwards to Junction 1 of M42. These locations require detailed study to assess specific impact and mitigation required, although similar impacts are felt from other development scenarios.</p>	The transport schemes identify that junctions along the A38 will require enhancements as a result of development pressure from all developments across Redditch and Bromsgrove.
Farm vehicles already have difficulty	New development cannot pay to rectify existing deficiencies but should not exacerbate any problem.
Getting from the site to the town centre and employment areas will create more local traffic	This issue is not particular to this site only. It is acknowledged any growth in the population will increase car usage.
<p>One access point to the A448 may not provide enough capacity, so additional access may be needed at Foxlydiate Lane. Bringing Foxlydiate Lane up to standard will be costly and community would not want it.</p> <p>The only way to persuade drivers to the main routes would be to ensure only one access/egress at the A448 junction but this wouldn't be safe or viable, expensive for the developer and would disrupt the local community</p>	Until a detailed transport assessment is undertaken it is not known what the capacity of the 'Foxlydiate junction' is to take new development, however it is likely that a re-design of the junction will be required to ensure that the junction has capacity. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.
Curr Lane and Pumphouse Lane unsuitable to be used to access the	It is not clear what this reference to 800 dwellings is referring to. For

Sub Issues	Officer response
800 dwellings.	site 1 a Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.
To achieve adequate sight lines and safe access and egress would require substantial engineering and re-alignment works	A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.
Underestimation of construction traffic particularly relevant to A448 and Callow Hill Cross Roads.	This is a temporary matter. All development causes a certain level of disruption to existing residents during construction, however this can be controlled through planning conditions.
Will provide scope to provide a link road from Foxlydiate junction through Area 1 to connect with an improved junction with Church Road and into Area 2 to allow for potential road link to proposed new housing on the ADR site to the south-east. This would inevitably reduce volume of traffic from the ADR site that will need to filter through the Webheath area to reach the wider highway network.	Noted
A district centre and primary school within the first phase of Area 1 will reduce the volume of traffic leaving the boundaries of the development area.	Noted
Access to A448 works against Policy 19 (v) of Redditch Local Plan No.4 so site should be removed from consideration	Policy 19 concerns the addition of new accesses. Site 1 is able to access the A448 through the upgrading of an existing junction.
Development here improves viability for travelling past Bromsgrove on to M42, towards Birmingham and beyond	Access is direct to the Strategic Road Network for all the focussed site areas enabling easy access to a range of destinations.
Main pressure exerted on A448, Slideshow Roundabout and A38 to M42 J1 thus proving the majority of traffic will head away from Redditch, negating the strategy to re-vitalise Redditch Town Centre.	Whilst some pressure will be added to the Slideslow roundabout and other junctions in Bromsgrove, the majority of the transport schemes required within Redditch are needed because of development pressure from all sites that are envisaged to be developed across the Borough. Access is direct to the Strategic Road Network for all the focussed site areas enabling easy access to the Town Centre.
Department for Transport predicts that transport growth expected to resume as the economy recovers and road travel will increase by approx 33% from 2011 – 2035. Over twenty years there's a trend to a large long term increase in car and light van ownership in the West Midlands. A further trend is to more and longer journeys especially to workplaces in the West Midlands Metropolitan Area and to changes	Noted. The trends in future car based travel have been taken into account in the projected traffic increases undertaken as part of the Halcrow transport modelling.

Sub Issues	Officer response
in retailing leading to the evolution of new shopping journey patterns. An increased number of people have been predicted for Redditch generating increased travel needs (not simply in the local area) and could accentuate these trends.	
No mention of likely increased pressure on minor highway network in and around Site 1. A study of traffic patterns locally would show significant levels of local and non local traffic using minor roads and heavy goods traffic from agricultural employment. Minor roads, many single track and very poor condition not capable of accepting large traffic increases	A high level assessment of the impacts of different growth scenarios around Redditch was undertaken in tandem with the HGDS. New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required.

KEY ISSUE: Transportation – Walking, cycling and horse riding

Sub Issues	Officer response
Speeding traffic dangerous for walkers, cyclists and equestrians. Increased safety risk for children walking to school and OAP's using the local grocery store	This response has been sent to WCC for comment
Many roads lack pavements	New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network or for provision of walking or cycling routes are required.
Safety concerns crossing the A448. No thought given for pedestrian walkways. residents will cross to access main bus route to Bromsgrove along B4096	This response has been sent to WCC for comment
Threatens public rights of way for walkers Number of footpaths and public rights of way could have a negative impact on the enjoyment of rural pursuits	Public rights of way would be required to be maintained as part of any development

Sub Issues	Officer response
<p>What's proposed regarding the only two Bridleways in this area? Plans show intention to build on two bridleways in Webheath.</p> <p>Cur Lane used at least twice weekly by Redditch Road and Path Cycling Club as return route to Redditch.</p> <p>National Cycle Route 5 passes through, and is clearly signposted on quiet lanes at Church Road. No clear proposals for handling of route 5.</p> <p>Increased cycle use is key to sustainable transport yet there is no clear explanation as to how this will be achieved for cyclists. Arrow Valley Runners Club meet at Morton Stanley Park and head along country roads through Webheath and beyond</p>	<p>Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.</p>
<p>Cycle usage will not increase as too many people rely on cars</p>	<p>The Policy requires improvements to passenger transport and other more sustainable modes of transport to encourage modal shift.</p>
<p>District Centre and school located to the east of the site and will therefore be within walking and cycling distance for Webheath residents.</p>	<p>Noted</p>
<p>Development will include improvements to walking and cycling network and will respect existing public rights of way</p>	<p>Noted</p>
<p>Footpath network and cycling routes along lanes testify to the high amenity value. Sustrans National Cycle Route runs through Bentley Paucefoot parish and acts as an important natural link between densely populated areas in the north towards the M42 and the wider Worcestershire countryside to the south. Constructed links through a major housing development would not compensate for the loss of long established country routeways.</p>	<p>Public rights of way would be required to be maintained as part of any development. Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.</p>
<p>Walking and cycling not only environmentally benign but socially advantageous since opportunities for primary contact with fellow residents are enhanced.</p>	<p>Noted</p>
<p>NPPF para 38 states that, where practicable within large scale developments, key facilities such as primary schools and local shops</p>	<p>The HGDS referred to the acceptable walking distances which are more up to date for this kind of assessment. It assessed distances to a</p>

Sub Issues	Officer response
<p>should be located within walking distance of most properties. Institution of Highways and Transportation “Guidelines for Providing Journeys on Foot” (2000) suggests acceptable and desirable walking distances. It is desirable that town centres are within a 200 metre walking distance, commuting and schools 500 metres and elsewhere within 400 metres. Due to the size and shape of Site 1 it is likely that it would be problematic to locate key facilities on this site within acceptable walking distances. Topography of Site 1 and the barrier-like effect of the major roads discourage the use of pathways.</p>	<p>range of facilities, and this was used consistently in assessing the distance to all potential sites. It is acknowledged that constraints such as high ridge lines may determine areas within the site that are less suitable for physical development.</p>
<p>Public footpaths and bridleways could provide increased recreational opportunities, including the potential improvement of the footpath network, provided they are sensitively integrated into new development.</p>	<p>Noted</p>

KEY ISSUE: Water

Sub Issues	Officer response
<p>A high level of risk of contamination by pathogens to the drinking water at the Curr Lane wells</p> <p>Curr Lane Wells are ‘compensation boreholes’ used to top up normal water flows in the Bow Brook to compensate for groundwater abstraction for water supply. The brook water is currently “very good status”. Any new development of the scale proposed has the potential to contaminate the wells.</p>	<p>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 (STWL).</p>
<p>There is borehole water extraction at Curr Lane, a large number of proposed properties would be built above extraction/pumping level, these are problems for the future if development goes ahead</p>	<p>There are two recorded boreholes and one possible borehole within the site in the vicinity of Curr Lane however these do not present a significant constraint to development of the site.</p>
<p>Swann Brook: The level of investment required to manage the storm and run off from the site will not be insignificant and any failure and resultant pollution will have a deleterious effect not just on the indigenous wildlife but also on the rural economy and potentially human health.</p>	<p>The water run off from the site will need to be managed to ensure that additional flows are not created. This will be ensured through the planning application process in consultation with the Environment Agency and Severn Trent Water Limited (STWL).</p>
<p>SUDS: building on Redditch marl is not ideal</p>	<p>There are a variety of SUDS techniques available which can be</p>

Sub Issues	Officer response
	implemented on sites throughout and around Redditch.
A water main crosses the southern portion of the site from north-east to south-west. The main is 450mm diameter and sits within a ten metre wide easement. It is anticipated to be a substantial supply main serving the Redditch area and diversion is not considered to be a viable option.	Noted
Unlikely that a service will be taken from the 450mm diameter main through the site. Assumed that reinforcement of local network may be necessary; invariably the case with edge of town developments.	Noted

KEY ISSUE: Miscellaneous

Sub Issues	Officer response
The TW application cannot be determined in isolation and should be looked at as part of the wider local plan.	It can be determined in isolation. Planning applications will be determined in line with relevant material planning considerations.
Webheath is a village and an established and thriving community. It WILL be destroyed if the proposal for 3000 houses is approved. In terms of community cohesion or social engineering/planning terms, is it advisable to increase a 'village' by two thirds?	Perceptions of whether Webheath is part of Redditch town or a separate village are simply that, perceptions. It has been the case for a long time in planning policy terms that Webheath as an area, has been included within the urban part of Redditch town. Irrespective of whether or not Webheath is a village, it is anticipated that any new residents can be integrated into the existing community.
I cannot understand how anyone would deliberately set out to upset long-term residents of Webheath Village	The planning system has not be set up to upset residents, however it is acknowledged that new development in any community may be at least initially resisted.
At least if building were confined to the Bromsgrove area along the highway, there would be no residents to antagonise.	It's the job of the planning system to establish the best location for development irrespective of the number of people affected or perceived to be affected.
It seems to me that there is a bias opinion that is prevailing against common sense.	The Redditch Growth Report is unbiased evidence to support the locations for growth.
I do not want our home to be devalued any more that the current economic climate had done. Affordable housing will drastically reduce the value of properties in this premium area (Bentley)	Property value is not a material planning consideration.
I quote page 66, section 7.08 "Neither Winyates Triangle nor	The document being referenced is the 'Study into the Future Growth

Sub Issues	Officer response
<p>Ravensbank are in the Green Belt and 5.8 ha of the Bordesley Employment site is part of the Brockhill ADR. The three areas will also meet different needs with Ravensbank being suited to B2 and B8 uses whilst Bordesley and Winyates Triangle are gateway B1 sites serving the west and east of the town respectively.' Section 7.11 states 'Whilst the Brockhill ADR west of the railway could be regarded as a sustainable location given its proximity to the town centre the site is compromised due to its topography and relationship to the adjoining countryside. The site also has a limited capacity of 308 dwellings based on the North West Redditch masterplan. There is capacity at Bordesley Park to accommodate either growth option and if our recommendation were to be adopted there would be no need to consider additional urban expansion sites within the plan period up to 2026 at the earliest.' With concerns of Webheath ADR sustainability, the Council stated 'In our view the Webheath ADR is not suitable for development due to the poor linkages with the town centre and employment areas, the quality and character of the landscape, the restricted highways network and difficulties in providing foul drainage.' There have been no changes to this area of Webheath since 2009, so nothing has changed, it is no more sustainable than it was in 2009.</p>	<p>Implications of Redditch Second Stage Report' (WYG 2). Reference to documents which conflict the proposals put forward in the HGDS are not relevant as WYG2 was largely discredited by the WMRSS Panel Report recommendations.</p>
<p>NPPF states <i>"Pursuing sustainable development requires careful consideration of viability and cost in plan making and decision making"</i> and <i>"the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened"</i>¹</p> <p>(¹ NPPF. Ensuring viability and deliverability. To ensure viability, the cost of any requirements likely to be applied to the development such as affordable houses, infrastructure contributions, should, when taking into account the normal cost of development and mitigation provide competitive terms for a willing landowner and a willing developer to enable the development to be deliverable)</p>	<p>There is no evidence at this stage to suggest that any of the developments around Redditch are unviable.</p> <p>Viability of the plan will be tested prior to publication</p>
<p>This site will and always be an isolated site that will have no benefit</p>	<p>There is no evidence to suggest the site will be isolated. It is</p>

Sub Issues	Officer response
to other residents unless all facilities are provided then, as can be seen in the "New Town" area antisocial behaviours will follow in future years	<p>anticipated that any new residents can be integrated into the existing community, the requirement for new facilities have been included in the policy and will be of significant benefit to both exiting and future residents.</p> <p>ACTION: Ensure the policy encourages community safety by incorporating the principles and physical security standards of the 'Secured by Design' award scheme or ensure there is reference to this elsewhere in the BDC plan.</p>
Existing residents will be extremely upset for many years with building / disruption / pollution / environmental disintegration etc. It will have similarities to HS2 in length of build, construction on going pollution, noise, social problems - properties will be blighted for many years if in the current climate the houses do not sell due to being isolated in no mans land in Bromsgrove but on the outskirts of Redditch	It is acknowledged that development anywhere will cause additional noise and disruption during construction; however this is considered to be only temporary. Planning conditions can be used to limit the level of disturbance during the construction phase.
Potential residents of new development would prefer their houses to back onto a golf course/ country park rather than existing houses. Therefore, providing housing immediately adjacent to current existing housing in Redditch at Webheath should not be a major decision making factor	It is not feasible for all development to back onto golf courses and country parks. Having an adjoining existing community with the proposed area will allow for better community integration with the existing urban area.
How does this plan enhance and improve the places in which we live our lives? (NPPF, The Right Hon Greg Clark MP)	As a local authority we have a duty to plan for the future housing and employment needs of the town. Development may lead to enhanced transport, education and other facilities.
More housing will bring an increase in crime	<p>The crime impact of any new development is taken into account. Early involvement of the Council's Community Safety Team, (in partnership with the West Midlands Crime Risk Advisor) provides crime prevention design advice for planning applications.</p> <p>The Council's are aware that this level of growth carries significant infrastructure implications for the police service and the Police Service will be engaged during the preparation of the Infrastructure Delivery Plans for Bromsgrove and Redditch.</p>
Residents of new homes will be left in no-mans land with inadequate	The development will create the need for new services and facilities

Sub Issues	Officer response
services paying Bromsgrove council charges but mainly needing to use Redditch facilities	and appropriate Council tax from the appropriate authority will be required. Development in this location will create a balanced community that fully integrates into the existing residential area of Webheath.
Make into a 'garden site' not a housing estate, each property should have a tree and shrub of British native species, street corners with groups of trees, some roads tree lined	The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure.
Development will destroy the rural character of Bentley	Whilst all areas surrounding Redditch would experience a change from a rural character to an urban character, it is not an issue exclusive to this site. The requirements for housing require that land is found to accommodate the development.
If development must go ahead in Foxlydiate consider affordable accommodation placement. Build near to Batchley and Brockhill where most are council homes and only private alongside private houses in Webheath and Foxlydiate Lane.	The policy requires that residential development should reflect the local requirements as detailed in the most up to date housing market assessment and comprise of up to 40% affordable housing with a flexible mix of housing types and tenures. These should be integrated, or pepper potted, through the development to ensure that the new development is vibrant and mixed.
Foxlydiate/Webheath and Bentley area (Site 1) are clean and rubbish free, with more houses there is a good chance of them becoming a dumping ground with litter, graffiti and property damage (reference to other council estates in Redditch).	This is not a planning matter
RBC have a duty to consider residents health and wellbeing, (and are partners in wellbeing board). Our living environment forms an essential part of wellbeing. This proposal will spoil current leisure and relaxation found in the location	This is considered in the analysis of the sites and the sustainability appraisal accompanying the HGDS, this includes social well-being where there is an acute shortage of houses to meet people's needs. Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.
Extension of the urban areas of Redditch along the A448 Bromsgrove Highway will mean that Redditch will dominate Bromsgrove economically, politically and population. Economically Redditch will increase its dominance over Bromsgrove as the place to go for commerce, retail and commercial. Resulting in	This is not a likely outcome, and no evidence has been provided to confirm that a site north would prevent this happening, the towns are separate and have their own identities and roles to fulfil.

Sub Issues	Officer response
a decrease in retail and commercial businesses operating from the area and reduction in employment, increased vacant properties and local tax take will reduce. This will create building opportunities through change of use of industrial areas? In order to protect the current Bromsgrove economy a site north of Redditch would be preferable creating two distinct areas?	
Are the council going to pay compensation to those who's conditions/ quality of life may be worsened by development?	There is no liability on the planning department for issues in the development stage
The amount of 'social housing' planned, but not widely acknowledged is totally out of character with the area and will necessitate considerable costs.	Irrespective of concerns, the policy requires that residential development should reflect the local requirements as detailed in the most up to date housing market assessment and comprise of up to 40% affordable housing with a flexible mix of housing types and tenures. These should be integrated, or pepper potted, through the development to ensure that the new development is vibrant and mixed.
Planning permission previously denied to build in Webheath because of moving sand problems and unsecure ground to build on.	This was not a refusal reason for Webheath ADR proposals. There are no known minerals deposits of concern within Site 1.
People have chosen to live in Webheath and this Plan wrecks their social aspirations.	Noted
The following Agencies have concerns with the Redditch Growth plan and BORLP4: Severn Trent (Paul Hurcombe), EA, Worcestershire Framework Directive, Worcestershire Highways Dept, Biodiversity Area Statement, Worcestershire Wildlife Trust, Meteorological Office, WYG (2)	Disagree, these stakeholders are invited to comment on the proposals and are required to feedback to the Council's in order to refine proposals or improve the policy. Reference to documents which conflict the proposals put forward in the HGDS are not relevant as WYG2 was largely discredited by the WMRSS Panel Report recommendations.
Site 1 does not comply with NPPF p.8 "When considering edge of centre and out of town proposals, preference should be given to accessible sites that are well connected to the Town Centre".	This is in reference to town centre uses and their location being preferable within or on the edge of existing town centres.
Photographic evidence submitted by E Morris and saved on Joint Shared Drive	Noted
Working population gravitates to where there is appropriate employment. The most attractive areas employment-wise are those that provide choices to enable employment flexibility and to maximise people's potential.	Noted

Sub Issues	Officer response
Council has been deflected in what should be a focussed appraisal, into seeking to achieve social gains to existing areas when the focus should be to achieve the most sustainable development which minimises harm to Green Belt purposes and areas of heritage and environmental sensitivity. Social benefits to Webheath can be achieved from a smaller Site 1 which avoids serious harm to the Green Belt and landscape.	The development principles used to analyse all of the sites factor in a number of concerns which the chosen sites should address, including green belt purposes and other environmental matters. The social benefits of a site are not an overriding concern which favoured Site 1 more than site 2 or some other areas.
Considerable uncertainty over deliverability of 2,800 dwellings in the Plan period in addition to 600 dwellings anticipated on Webheath ADR. Implied delivery rate of 3,400 dwellings in this location is significantly in excess of 200 dwellings per year to 2030, allowing for the lead-in time required. An alternative strategy that limits development to approximately 1,500 or 1,600 dwellings represents a more realistic strategy which could be deliverable.	The delivery of the site would require approximately 160-170 dwellings per annum. The plots can be sold to separate house-builders who can deliver different types of houses to the market at the same time.
No evidence of a masterplan being done for this site so can there be a realistic prospect of delivery on this site?	The evidence required to understand the constraints and necessary improvements has been completed, and developers have submitted masterplans for the site.
No evidence that any discussion has taken place between developers and the Councils. Cannot see how site 1 can be delivered within five years	These discussions have been ongoing
Opportunities exist to provide housing in area 5, parts of area 7, 8 and 11 and by utilising Redditch's generous green space.	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 successfully integrate into the built form of Redditch and cause least harm to the Green Belt. These sites also have very few constraints in terms of environmental or historic designations. Open space sites generally contain important ecological designations or have archaeological value and also form an important part of Redditch's sports and recreation provision.
Query number and distribution of 'tips' in the area covered by your Plan No.4 'Foxlydiate' and confirming your policy in restricting development to within 200m of said 'tips' and your policy as to vapour barriers and vents	It is not understood what the respondent is referring to
Since builders can self certify building regulations builders can depart from legitimate requirements that the rest of us have to abide with	All development must be built to Building Regulation standards

Sub Issues	Officer response
Should the north Webheath site proceed, it could take 3-4 years before sewerage capacity improvements are complete and any planning permissions will need to take note of this timeframe.	Noted, phasing will be required on both sites 1 and 2

Site 1 – Foxlydiate (Area 4) - SUPPORT

KEY ISSUE: Support for development of Area 4

Sub Issues	Officer response
Number of Areas allocated for development in Local Plan 4/ Cross Boundary Growth Expansion (2030) should be kept to a minimum to minimize overall impact. No one Area can provide the full requirement so limit development to 2 Areas maximum. (Areas 4 & 6)	Noted, this is what the HGDS proposes
I think you are choosing reasonably well	Noted.
Support Site 1. It is essential that Bromsgrove and Redditch identify further land to accommodate their housing needs. Consider that the two Authorities have given full consideration of alternative locations.	Noted.
Support Site 1. It is important that the view of new development is shielded by some appropriate tree planting, to maintain the longer range views of the countryside.	Noted
Support Site 1 since it is expansion of existing housing and so will simply make larger, joined up, communities.	Noted
Preferred option fairly distributes the housing requirement for between 2 sites, thereby using 2 main arterial roads (A448 to Bromsgrove/Worcester and A441 to Birmingham)	Noted
Area 4 allows easy access to Redditch town centre via existing roads	Noted.
Support for the SWOT analysis in the Housing Growth Executive Summary	Noted.
Welcome proposals that development of the sites would include provision of green infrastructure and the steps taken so far to identify existing landscape and nature conservation interests and sensitivities.	Noted.
Welcome the attention given to flood risk – one of our [National Trust] ongoing concerns is risk of flooding to the historic property in our	Noted, this will be explored with the developer

Sub Issues	Officer response
<p>care at Coughton Court. This could be affected by development upstream at Redditch. Would look for SuDS to address impacts on the wider catchment as well as the watercourses most closely related to the sites.</p>	
<p>Foxlydiat and Webheath would benefit from the improvements to local infrastructure and other community facilities.</p>	Noted.
<p>Ideally suited for quick access to the A448, which opens up opportunities to travel in either direction for work opportunities and to revitalise both town centres</p>	Noted.
<p>The vast majority of Site 1 lies in Flood Zone 1 based on 'indicative' Flood Zone Map. However, there is an ordinary watercourse (Spring Brook) and its tributaries within the site boundary. Spring Brook has an associated floodplain only up to Cur Lane. Above this, the catchment size is less than 3km². Floodplain extents for Spring Brook are not based on a detailed hydraulic model but on a national, generalised flood mapping technique which ignores the presence of structures such as bridges and culverts and the potential impacts of blockages.</p> <p>Given the site size, the small catchment size of the watercourses and topography, the majority of the site would be located within Flood Zone 1 where development is appropriate (in considering fluvial flood risk).</p>	<p>A site specific flood risk assessment is being completed for Site 1 in consultation with the Environment Agency.</p> <p>Noted</p>
<p>Landowners are working together to secure the delivery of the site</p>	Noted.
<p>Support cooperating between authorities and that Foxlydiat represents a sustainable location for meeting future housing needs for Redditch</p>	Noted.
<p>Site 1 represents a suitable, available and deliverable option to secure cross boundary growth</p>	Noted.
<p>Note and support the reduction in overall size of this area based on the reduced likely impact on adjacent Local Wildlife Site (LWS – previously known as SWS) woodlands a smaller development area will bring. However we continue to believe that careful protection of these sites will be important.</p>	Noted, the HGDS considered these constraints

Sub Issues	Officer response
Support proposed integration of SUDs and protection of the watercourses within a comprehensive GI network.	Noted.
Webheath represents a sustainable community within Redditch. There is considerable scope for enhancement of local services and facilities, which the development could deliver to the betterment of future residents and existing community.	Noted.
Site 1 defined by strong, readily recognisable and defensible boundaries formed by the Bromsgrove Highway to the north-east; Foxlydiat Lane to the south-east; Pumphouse Lane to the south; strong natural features such as mature hedgerows and a stream to the west; and Cur Lane and Gypsy Lane to the west and north-west.	Noted.
Can be considered as three adjoining areas capable of being developed comprehensively on a phased basis over the Plan period. Area 1 (rear of the Foxlydiat Arms); Area 2 (south of Cur Lane); and Area 3 (north of Area 1 and north-east of Cur Lane and Gypsy Lane). Area 1 can reasonably be considered as a first phase, with Area 2 as a sensible second phase and Area 3 as a potential third phase.	Noted
The basic concept would be to provide development at a medium density, which might be reduced towards the fringes of the various areas, where sensitive landscape or other environmental or technical issues suggest that a lower density might be more appropriate.	Noted this can be refined in the design of the development
Growth Option 1 area could average around 35-40 dwellings per hectare (DPH), which when applied to a notional net developable area of around 67%, would equate to 75-80 hectares capable of accommodating around 2800 dwellings, plus extensive areas of public open space as broadly indicated on the concept plans.	Noted
Area 1 and 2 might each accommodate in the region of 1000 dwellings, whereas the reduced Area 3 could accommodate around 800 dwellings, with the remainder to the north, retained as open land or woodland.	Noted.

Sub Issues	Officer response
<p>Area 1 would accommodate a Local Centre comprising a Primary School (which would be capable of being enlarged); plus a small group of shops and possibly a health centre (doctors and dental surgeries and possibly a chemist). The school could be located towards the eastern edge of the site, so as to be well positioned in a very accessible location with good vehicular and pedestrian linkages and as close as possible to the existing urban area of Webheath, which it could also serve.</p>	<p>Noted.</p>
<p>Foxlydiate sector (reduced Area 4 of Scenario 2) - This land will provide a natural extension to Webheath. Accordingly, we find it difficult to oppose its development.</p>	<p>Noted.</p>
<p>Pumphouse sector - This constitutes a considerable extension of Redditch, protruding into Green Belt. It should be on the reserve list, to be used only if sufficient land cannot be found elsewhere. Spring Brook is a robust boundary, and is lined by trees, which (until they are mature and are felled for timber) shields the sector from the countryside to the west around Upper Bentley. If the area does have to be taken out of the Green Belt, suggest that there is an alternative boundary considered in the form of a continuous hedge (or fence) from Cur Lane at SK010669 to SK00756630. After that the boundary would cut across a field to Pumphouse Lane at SK 007661. There it would meet the suggested extensions to the Webheath ADR, with hedges leading straight across the valley to Crumpfields Lane at SK012656.</p>	<p>Noted.</p>
<p>English Heritage agrees with the recommended preferred option [Area 4 (Site 1) and Area 6 (Site 2)] and their proposed spatial extent</p>	<p>Noted.</p>

Site 2 – Brockhill East (Area 6)

KEY ISSUE: Support for development of Area 6 general comments

Sub Issues	Officer response
The number of Areas allocated should be kept to a minimum to minimize overall impact. No one Area can provide the full requirement so limit development to 2 Areas maximum. (Areas 6 & 8)	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 successfully integrate into the built form of Redditch and cause least harm to the Green Belt. Area 8 is not a preferred location.
Will address the need for first time buyers	This is true for all potential development areas.
Infrastructure is already in place	All sites will require new infrastructure provision to support development.
<p>I think you are choosing reasonably well</p> <p>Support Site 2. It is essential that Bromsgrove and Redditch identify further land to accommodate their housing needs.</p> <p>Support for the SWOT analysis in the Housing Growth Executive Summary</p> <p>Accept that Site 2 seems a suitable choice for development at the scale proposed</p>	Noted.
The Authorities have given full consideration of alternative locations. Support extension of Redditch Local Plan No.4 to include Area 2 which includes land owned by our clients, Worcester Diocesan Board of Finance Ltd off Brockhill Lane.	Support noted. This land falls within the proposed Site 2 boundary.
Support Site 2 since it is an expansion of existing housing and so will simply make larger, joined up, communities.	Noted.
Preferred option fairly distributes the housing requirement between 2 sites, thereby using 2 main arterial roads (A448 to Bromsgrove/Worcester and A441 to Birmingham)	Noted.
Brockhill would benefit from the improvements to local infrastructure and other community facilities	Noted.
Site 2 is mainly located on Secondary Aquifers and is therefore	Noted.

considered to be a 'low risk' site in terms of controlled waters receptors adjacent to Weights Farm Landfill, regulated by us (Environment Agency). It is an inert landfill site that receives relatively low quantities of waste. We have no substantiated records of any complaints/ issues associated with its operation. Whilst it should be taken into consideration during the design and layout we do not envisage proposals would significantly impact on the ability of the operator to meet the conditions of their permit.	
Site 2 accommodates a modest extension of some 600 to 670 dwellings to the Brockhill East Strategic Site identified in the Draft Redditch Local Plan No 4.	Noted.
Has benefit of being part delivered, with the remainder subject of masterplanning exercises and subject of advanced pre-application discussions.	Noted.
Brockhill East will take development to RBC boundary; it's close to the town centre and existing and planned employment mean that it is logical to look beyond it into the Green Belt	Noted.
Can form a cohesive new neighbourhood centre on the planned relocation of the Holyoakes First School, playing fields and a new district centre.	Noted.
English Heritage agrees with the recommended preferred option [Area 4 (Site 1) and Area 6 (Site 2)] and their proposed spatial extent	Noted.

KEY ISSUE: Objection to development of Area 6 general comments

Sub Issues	Officer response
<p>Brockhill is already a large housing estate and is continuing to grow. To locate a further major development adjacent would give a continuous unrelieved urban sprawl across the North of Redditch and the proposed islands of biodiversity would be so isolated as to be virtually worthless.</p> <p>Important wildlife habitat</p>	<p>Any habitats or species survey completed would identify where and what type of mitigation would be required in order to facilitate the development, therefore biodiversity would be maintain or enhanced. The Policy states that "sites will have an overall strategy and management plan for green infrastructure which maximises opportunities for biodiversity and recreation, whilst protecting existing biodiversity habitats and landscape geodiversity." The proposed site 2 would be contained by the proposed new Green Belt boundary at Weights lane so it would not be permitted to sprawl northwards</p>

Reduction of good quality agricultural land and the loss amenity value to the residents. Agricultural value	Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed housing needs. As the land is of a similar agricultural quality across all focussed areas appraised the loss would be equivalent in any area chosen and therefore it is considered to be only a minor constraint to development.
Area used for recreational purposes	Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for biodiversity and recreation.
WYG2 (p.97) states that natural habitat has only 'limited value'. Community woodland has now been planted in this location	The community woodland will be designated in the Redditch draft Local Plan No.4 as open space within the Brockhill East Strategic Site and as part of the masterplanning of the strategic site it is clear that there is no willingness to build here. It is unlikely that there would have been a significant change in ecological status, however the WYG 2 documents are not what was consulted upon as part of the HGDS ACTION: Amend RBC Policies map
Infrastructure is compromised by electricity surges and power drops	On any site, electricity supply is not considered to be an issue which would constrain or prevent development. Consultation with the infrastructure providers including Western Power Distribution and National Grid is on-going to determine the infrastructure needed to support development.
There are no public rights of way within the area in order to ensure permeability of the site.	Noted Policy wording needs to reflect the creation of permeable routes through the site where there are no existing sites. ACTION: Amend policy third paragraph to reflect site 1 being able to make full use of existing walking and cycle routes, but that site 2 needs to create these routes.

KEY ISSUE: Flood risk

Sub Issues	Officer response
Welcome the attention that has been given to flood risk – one of our [National Trust] on-going concerns is the risk of flooding to the	Noted. The draft policy requires SUDS to manage surface water runoff however, reference to areas downstream of the sites can also be

historic property at Coughton Court. This could be affected by development upstream at Redditch and we would therefore look for the SuDS to address impacts on the wider catchment as well as the watercourses most closely related to the sites.	included. ACTION – amend policy criterion v “surface water runoff must be managed to prevent flooding on and, around and downstream of the sites through the use of SUDS.”
Lies within Flood Zone 1 based on our ‘indicative’ Flood Zone Map. However, the watercourse within the site is very small/minor and its floodplain is not mapped because its catchment area is less than 3km ² . Given the size of the site and the small catchment size of the watercourse, the majority of the site would be located within Flood Zone 1, where development is appropriate (in considering fluvial flood risk).	Noted.
Given the topography of Site 2 and the close proximity to the River Arrow, policy should address issue of mitigating flood risk that might result along the River Arrow Valley running south-east Flooding along Windsor Road	It is not considered that the River Arrow is within close proximity to Site 2. However, a site specific flood risk assessment will be required with any development proposal which will identify any necessary mitigation measures.

KEY ISSUE: Landscape

Sub Issues	Officer response
Area 6 looks inwards to Redditch as opposed to looking out towards the Malvern’s and the Cotswold’s	This is not a valid reason to constrain development. A large part of area 6 is within Redditch Borough boundary and parts are already subject to approved planning permission for both housing and employment. It is considered that site 2 would integrate well with these existing proposals as well as the existing urban form of Redditch (HGDS, Para 6.3.82). It is also considered that site 1 would integrate with the existing urban form at Webheath (HGDS, Para 6.1.89).
Expansion of Site 2 towards the north is possible and if controlled will minimise landscape impact	The preferred option of sites 1 and 2 will provide land for Redditch’s housing needs to 2030. It is not considered necessary to propose more development. The HGDS has analysed possible Green Belt boundaries for the longer term and has identified Weights Lane to the north of Site 2, as a strong defensible boundary. It is not appropriate

	<p>to expand growth beyond this boundary.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>
<p>New houses should not be built on the hillside above the railway line facing Bordesley. This will be an eyesore for residents in Bordesley and those travelling on the A441 into Redditch. Houses being built on this land will not be in keeping with the green belt or the landscape of the area and it will look ridiculous to have houses on the hillside just up from the railway.</p> <p>Area 2 needs to be adjusted to show that land on the hillside next to the railway remains green belt land and that area 2 begins the other side of the hill which will be more in keeping with the development at Brockhill East and keep a more distinct and clear green belt boundary. This dividing green belt boundary is crucial and building houses by the railway line on the hillside cannot be allowed as it is not in keeping with the landscape or Weights Lane industrial development which it will border.</p> <p>To the north the landscape is steeply rising to Butlers Hill and noticeably changes to a more secluded and intimate small-scale rural character. Development at this higher level would break the skyline and be visually intrusive. It should be kept well back from Brockhill Lane with a buffer to protect the character of the lane and of Hewell Grange and the higher land at Butlers Hill should be excluded entirely.</p>	<p>Paragraph 6.3.85 of the HGDS acknowledges this site constraint of the varying topography within Site 2. It is considered that “appropriate design could reduce this negative impact, particularly regarding long term views”.</p> <p>In addition site 2 could contain housing development by virtue of the ridgeline and high points at the western boundary of the site which will assist in safeguarding the countryside from encroachment.</p>
<p>Housing would reach the ridge just east of Brockhill Farm but would not intrude into open countryside from this direction</p>	<p>Site 2 western boundary is at the ridgeline. The HGDS does not propose to develop beyond this to Brockhill Farm.</p>
<p>There would be an impact on the tranquillity of the setting of the Hewell Grange Registered landscape, but partly mitigated by the presence of Brockhill Wood</p>	<p>It is not considered that Site 2 will impact the setting of Hewell Grange Registered Landscape. By virtue of the eastern boundary being a ridgeline and the location of Brockhill Wood, impact beyond to the conservation area and Registered Landscape is considered negligible.</p>

Located on a prominent ridgeline of Butler's Hill, constrained by large woodland blocks and diverse landform. Due to its attractive qualities and frequency of landscape features, considered moderate/high overall sensitivity and low capacity.	It is considered that "appropriate design could reduce this negative impact, particularly regarding long term views" (para 6.3.85 of HGDS).
Support Site 2. It is important though that the view of the new development is shielded by some appropriate tree planting, to still maintain the longer range views of the countryside	Noted.
Welcome proposals for inclusion of green infrastructure and the steps taken so far to identify existing landscape and nature conservation interests and sensitivities	Noted.
This site has significant tree and hedgerow interest as well as the Red Ditch watercourse and adjacent LWS woodland. Whilst we do not wish to object to the reduced proposed allocation illustrated in figure 15 we do consider that retention and enhancement of this important GI resource will need careful consideration in any final allocation here. We therefore support the commentary regarding opportunities to integrate these features into a robust GI package for this area and we welcome the weight this is given in the Housing Growth Policy.	Support to retain and enhance Green Infrastructure noted.
Both the 2009 RPS/FPCR Study and the Councils' own January 2013 Development Study supported development. 2009 Study appraised a slightly differently area to site 2. However, general appraisal noted it was well contained in landscape terms so that encroachment would be minimised.	Noted. There is a difference between Area 6 and site 2 because site 2 was formed to reflect the outcome of analysing the most defensible green belt boundaries and to form a developable area.
January 2013 Development Study found that of five 'weaknesses', two are common to all sites (loss of agricultural land and Green Belt). Other weaknesses (topography, high landscape sensitivity and loss of wooded estatelands) are manageable in that they do not constrain the whole area and development can be accommodated with sensitive urban design including establishment of ridgeline woodland planting characteristic of the area	Noted as per Paragraph 6.3.85 of the HGDS "appropriate design could reduce this negative impact, particularly regarding long term views".
Existing development is not sympathetic with the topography of the local area	Noted.

KEY ISSUE: Green Belt

Sub Issues	Officer response
Issue with the strength of the Green Belt boundary west of Site 2.	The majority of the western boundary between Brockhill and Weights Lane is considered strong (HGDS, Page 229). This is due to the mature woodland and mature tree lined hedge row. The relatively small boundary at 15 could connect easily with the mature woodland. In addition to this the land rises due west to form a ridge which would contain the area.
Identify safeguarded land at 'Brockhill North' with Weights Lane and Butlers Hill Wood as southern Green Belt boundary and Cladshill Wood as eastern Green Belt boundary and the western edge of the ADR.	<p>The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>
Well shielded from adjoining countryside by ridges of hills, so will have little impact on the Green Belt	Agreed – it is considered Area 2 is well contained and will assist in safeguarding the countryside from encroachment (NPPF paragraph 80).
Strip of land between Brockhill Lane and Brockhill Wood is suitable to be released from the Green Belt if land opposite is	The furthest land parcel to the west which lies below Brockhill Lane is beyond Area 6 and was dismissed in the HGDS under Area 5 analysis. Para 6.2.70 “At the northern extremity of the area, in the vicinity of Brockhill Farm, the land parcels north of Brockhill Wood appear remote from the remainder of the area. The wood provides a strong boundary and development beyond this would encroach into the countryside”. The other land parcel, not part of Brockhill Wood but south of Brockhill Lane (Greensleeves) would not be considered a good defensible alternative Green Belt boundary because Brockhill Lane for a its entire length alongside the proposed growth area, is a

	very strong potential boundary. Development in this location would also be remote from Site 2 due to its disconnection by Brockhill Lane.
The north-western boundary selected in the HG document approximates to a ridge. The boundaries adopted are those of fields. By taking the ridge itself to be the boundary, slightly more land could be released. It may be unsatisfactory for the Green Belt boundary to cut across fields. If the present suggested boundary is not an ownership boundary, there's no great difficulty will arise from this change. Even if ownerships are different, the sale of additional land could easily resolve any difficulty. The value of development land is so high that ownership differences ought not to be allowed to affect the outcome of a Green Belt review.	The north western boundary (boundary 10 in the HGDS) is a field boundary which is defensible, but also an appropriate place for the developable area to end in terms of topography. Both of these features lend themselves to the site 2 boundary being defined as proposed.
There is another possible robust boundary further from the town, in the form of the two pools in the valley west of the ridge. The adoption of these as a boundary is unattractive, as it would take the extent of the town over the top of the ridge and into the next valley. If the pools were the boundary, the logical northern boundary might be Butler's Hill Wood, rather than continuation of Weights Lane. Would regard this extension, west of the ridge, as a reserve option, to be used if insufficient land not found elsewhere.	The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development. The HGDS has analysed possible Green Belt boundaries for the longer term and has identified Weights Lane to the north of Site 2, as a strong defensible boundary. It is not appropriate to expand growth beyond this boundary. Para 6.3.61 of the HGDS states "development past this ridge would lead to encroachment of the countryside as this area appears remote from the remainder of the area. The ridge (156 meters) would visually contain any development further east in the area".
Borough boundary uneven and Weights Lane provides a clear, strong and defensible boundary.	Noted the HGDS consider this.
Area 2 would be an extension to a current housing development and adjacent to an Industrial Park, but is still Green Belt with difficult access	All of the twenty sites analysed were either Green Belt land or areas of open space within Redditch. Access to the sites would form part of the development proposals and are feasible for all development sites in the focussed appraisal.

KEY ISSUE: Open Space

Sub Issues	Officer response
From the previous Persimmon build in Brockhill only one piece of Brockhill Open Space has been adopted only in January 2013. This	The long-running adoption issues at Brockhill are acknowledged as unfortunate and largely unacceptable. However, whilst this is

is 10+ years after development completed. This isn't a good advertisement in looking after the wellbeing of locals.	essentially a legal matter, Planning officers will aim to be more proactive with respect to future developments, in any location to ensure this situation is not repeated.
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KEY ISSUE: Transport – Public Transport

Sub Issues	Officer response
There is potential for pedestrian access to Alvechurch Station from Area 6	Alvechurch Station is too far away from Area 6 for there to be a walking route created that would be within reasonable walking distance.
The southern and eastern sections of Area 6 are in close proximity to bus services. There are no bus stops on Weights Lane or Brockhill Lane. There are bus stops towards Salters Lane and Batchley Road (1.2km). The need to travel would be reduced if more local facilities/services provided development	The Policy states that “significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both site 1 and site 2 which make full use of new and existing walking and cycling routes...”
Accessibility to services and facilities are considered good with access to some possible by sustainable modes. Some facilities within walking distance and for access to facilities further afield public transport may be possible.	Noted, this has been taken into account in the HGDS.
Close to public transport infrastructure	

KEY ISSUE: Transport – Road Infrastructure

Sub Issues	Officer response
Windsor Rd is a bottleneck with the bridge for Birmingham area traffic, A441 north of Sainsbury's is a bottleneck	<p>The transport infrastructure evidence completed by Worcestershire County Council and Halcrow, takes account of this and recommends improvements to the network to mitigate the cumulative effect of the development in the area.</p> <p>This response has been sent to WCC for comment</p>
Site 2 bounded by a single track lane, any traffic emerging from Site 1 would cause congestion on this and other lanes as people try to find 'rat runs' to avoid the traffic congestion, leading to more accidents	
Development here likely to disperse movement on the local and strategic highway networks more evenly than other locations, with	

trips being made both eastwards and westwards but with potential heavy flows on Brockhill Drive.	
Far fewer roads will have to be built and more importantly maintained	
Increased traffic on Brockhill Drive	
Area 6 allows easy access to Redditch town centre via existing roads	Noted, this was taking into account in the HGDS
Area 6 has the potential to facilitate pedestrian trips to Redditch Town Centre, however investment in infrastructure will be required to maximise trips.	The Policy states that <i>“significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both site 1 and site 2 which make full use of new and existing walking and cycling routes...”</i>
Speeding vehicles are already a problem along Brockhill Drive	This response has been sent to WCC for comment
Roundabout at Hewell Road/ Brockhill Drive is dangerous	This roundabout was designed to be at-grade to enable development to the Brockhill ADR site

KEY ISSUE: Education

Sub Issues	Officer response
Discussions are taking place with Persimmon Homes regarding education provision for their development in the area around Lowans Hill Farm. It is intended that a new school site will be provided and that there will be sufficient space to allow the school to expand to meet the needs of children living in the new housing in both Redditch and Bromsgrove. The County Council is not of the opinion that additional middle or high schools are required. However we will be expecting these developments to make appropriate contributions towards extending provision at existing schools as necessary to meet any increased demand.	Noted, this is taken into account in the HGDS

Housing Growth Consultation – Consultation Responses

Brockhill West (Area 5) - Support for exclusion of Area 5

KEY ISSUE: Support for exclusion of Area 5 - General

Sub Issues	Officer response
Object to any development of Area 5 up to 2030. This area should be positively and clearly identified and named as being excluded with clear justification and explanation of the reasons why.	Noted. The proposed policy states that sites 1 and 2 will meet the housing requirements in Redditch up to 2030. The HGDS considers area 5 and the overall conclusions in chapter 10 do not recommend area 5 for development before 2030.
Support the exclusion of Area 5 (Brockhill West) from development in order to protect the area behind Dairy Lane referred to as Batchley Brook Valley (within Area 5).	Noted. Constraints within area 5 have been noted within the HGDS. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. These sites also have very few constraints in terms of environmental or historic designations.
Many 'Persimmon Assets' (such as under-passes) in Brockhill still unadopted after 13+ years.	The long-running adoption issues at Brockhill are acknowledged as unfortunate and largely unacceptable. However, whilst this is essentially a legal matter, Planning officers will aim to be more proactive with respect to future developments, in any location to ensure this situation is not repeated.
The public consultation document clearly states that this area is considered as unsuitable for developing as part of the plan. We believe that considering the information and decisions expressed for this area, it should not be re-introduced after the public consultation under any circumstances otherwise the whole process could be described as being misleading.	<p>The HGDS clearly states that sites 1 and 2 will meet the housing requirements in Redditch up to 2030 but there is no suggestion in the report that Area 5 is unsuitable for development, just that it is not the most appropriate location because of surrounding historic built environment and setting of heritage assets.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within</p>

	<p>the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment as the process for preparing plans can change and national government may have changed their plans for meeting the housing shortfall across the country.</p>
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KEY ISSUE: Support for inclusion of Area 5 - General

Sub Issues	Officer response
Bromsgrove District Local Plan should emphasise suitability of land at Brockhill West to provide a comprehensive cross-boundary urban extension to contribute deliverable development to meeting the strategic housing requirement	It is not considered appropriate to suggest land at Brockhill West is suitable for development. It was made clear that “a large proportion of this area [5] may not be appropriate for development due to the surrounding historic built environment and setting of heritage assets.” (HGDS, Para 6.2.101).
Identified acceptance in evidence that Brockhill West is a sustainable and logical location for extension to the urban area	Comment noted. Area 5 was considered as a potential location for Redditch Housing Growth. However after detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt.
In place of 2,800 dwellings at Foxlydiate and no development at Brockhill West, allocate 1,550 dwellings in the eastern central part of Foxlydiate adjacent to the A448 and 1,200 dwellings at Brockhill West. 250 within Redditch and approximately 950 in Bromsgrove to which accesses exist on the western edge of the existing Brockhill development.	The suggestion made is not considered a suitable option for an urban extension to Redditch, following the HGDS and the conclusions to area 5. Paragraph 6.2.110 states “It is considered that the potential impact on the heritage assets at Hewell Grange Conservation Area and the Registered Hewell Grange Grade II* Historic Park, raises substantial concerns as to the suitability of Area 5 to take housing growth to meet the needs of Redditch Borough.”
Eastern central part of Site 1 has some merit; this applies only in conjunction with parallel proposals at Brockhill West where suitable connectivity can be created.	It is considered that sites 1 and 2 have more merit in meeting Redditch’s housing needs to 2030 that all of the 20 sites examined, as they are considered to be the most sustainable and have the fewest constraints in terms of environmental or historic designations.
At its greatest extent, the site could accommodate 1560 dwellings – a	The suggested capacity of the site is noted. As already mentioned the

significant contribution to the sustainable housing target and, as such, it would merit further study.	significant historic constraints of area 5 make it an unviable option for Redditch housing growth.
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KEY ISSUE: Infrastructure

Sub Issues	Officer response
<p>There is no infrastructure supporting the existing estate. There is no post office and only limited shopping.</p> <p>There is already a shortage of schools in the area and all doctors are some distance away.</p>	<p>Noted. The supporting infrastructure and nearest facilities were considered in relation to all of the focused areas of study, this included a consideration of the nearest facilities to area 5, see paragraphs 6.2.22-6.2.33 of the HGDS.</p> <p>Any future development of the scale proposed is likely to include additional facilities, however the preferred option of both Councils, to develop Sites 1 and 2, is considered to be the most sustainable location for Redditch housing growth.</p>

KEY ISSUE: Transport

Sub Issues	Officer response
<p>This development will not benefit the people and businesses of Redditch. It is more likely to attract commuters for Birmingham and elsewhere due to its access to the M5.</p>	<p>Area 5 is not being proposed for development. It is considered that sites 1 and 2 are the most sustainable locations for development and the locations selected are not likely to make a significant difference to where the commuters will be attracted to</p> <p>There are a wide range of other considerations that suggest the preferred option would cause least harm to the Green Belt and has fewer constraints in terms of environmental and historic designations.</p>
<p>Rail access to destinations for employment outside of Redditch</p>	<p>It is considered that access to rail services is favourable to any development site as it increases the transport modes available and the overall sustainability of a site. Good rail access to Redditch is vital to improving accessibility and could equally result in attracting employment uses to Redditch.</p>
<p>The increased traffic flow onto the Bromsgrove Highway will cause problems at peak times</p>	<p>Worcestershire County Council (WCC) have completed transport assessments which recommend the highway improvements that are</p>

	<p>needed to support the two sites for development (with an understanding that all of the proposed development sites within Redditch and within Bromsgrove also come forward during the plan periods).</p> <p>There is a need for highway improvements to support the two proposed cross boundary sites if they are to be developed sustainably. An example of a highway improvement that has been identified by WCC is an additional approach lane on Brockhill Drive to Bromsgrove Highway/ Brockhill Drive. There are other highway improvements needed, they are all detailed in the supporting evidence base.</p> <p>Highway improvements will be predominately paid for by the developers.</p>
The increased traffic will cause a great deal of environmental damage to the area.	<p>Area 5 specifically is not being developed. A sustainability appraisal was carried out to assess the most suitable locations for development. Air quality is monitored throughout the District and no AQMA's are located within the immediate vicinity of the area. Further studies would be required to assess the impact development would have. In addition to this the sites chosen have very few constraints in terms of environmental designations.</p>

KEY ISSUE: Ecology/Biodiversity

Sub Issues	Officer response
Lack of recorded evidence for protected species area may mean that future survey findings will alter or reduce the overall developable area or lead to requirements for particular mitigation or enhancement	<p>There is no detailed Habitats and Species Survey. All sites have ecology issues which would need to be mitigated against.</p> <p>The Policy proposed requires any development to “protect existing biodiversity habitats and landscape geodiversity.”</p>

KEY ISSUE: Flood Risk

Sub Issues	Officer response
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<p>Area 5 is mainly underlain by Mercia Mudstone Secondary Aquifer with a small part of the site within SPZ 3 for Severn Trent Water Ltd. public water supply boreholes. There is Flood Zone 2 and 3 associated with the Batchley Brook (classified 'ordinary watercourse') plus a number of smaller tributaries. Flood modelling would be required to define the developable area. Development should be located within Flood Zone 1 with sufficient protection given to the watercourse corridor and Hewell Park Lake Site of Special Scientific Interest (SSSI).</p>	<p>The extent of the flood risk would not be known until detailed Flood Risk Assessments are completed for any site. These constraints have been considered within the HGDS.</p> <p>The proposed sites 1 and 2 mean that development within area 5 is not required as it is considered that the preferred sites present the most sustainable options.</p>
<p>Issues pertaining to Batchley Brook is significant constraint to delivering large scale development</p>	<p>This constraint has been noted in Paragraph 6.2.36 of the HGDS. "Batchley Brook is one of the watercourses identified in the Level 1 SFRA that is most vulnerable to exceeding its flow capacity to an extent that properties have been affected."</p>
<p>If Area 5 is selected all the run-off water will be collected in attenuation ponds/SUD's at the base of the development. The flow of water being fed into Batchley Brook therefore considerably increased making developing on the opposite side of the Brook from the attenuation ponds/SUD's more problematic</p>	<p>Development is not proposed within area 5. The issue of flood risk has been considered for area 5 (see section 6.2.34 of the HGDS).</p> <p>The use of SuDS as a means of managing surface water runoff had been identified as a policy requirement in order to prevent flooding in and around the proposed sites.</p>
<p>The whole area prone to severe flooding. To the rear of [1-19] Dairy Lane, has suffered continuously, resulting in:</p> <ul style="list-style-type: none"> • Flooded underpasses requiring residents to cross a main road with no pavements or safe crossing (Brockhill Drive) to access shops, schools and buses etc. • The culvert under Brockhill Drive being unable to service the flow of water at peak floods and therefore back floods into the Open Space and underpass. This fierce fast flowing brook when in flood is a serious danger, especially to small children. • The attenuation ponds/SUD's in Brockhill Park are ineffective as there is still serious flooding. There has even been a registered flooding incident in Dairy Lane, so we may not be immune from future flooding if development here goes ahead. <p>Mathematical models reflect what should happen; local evidence reflects what does happen. We can find no information that explains fully and clearly how creating 'balancing ponds', 'attenuation ponds'</p>	<p>General constraints of flooding in relation to area 5 noted and as a general point have been considered as an area constraint in the HGDS (section 6.2.34).</p> <p>Area 5 is not proposed for development. The extent of the flood risk in the proposed sites would not be known until detailed Flood Risk Assessments are completed for any site. Adequate reference to SUDS is made within the policy; additional detail would be too specific as it would only repeat policies elsewhere in the Bromsgrove District Plan.</p> <p>The proposed sites 1 and 2 mean that development within area 5 is not required as it is considered that the preferred sites present the most sustainable options.</p>

<p>or 'sustainable drainage solutions' for Batchley Brook will in anyway alleviate this issue of flooding.</p>	
<p>If Area 5 is reconsidered for development land to the rear of 1-21 Dairy Lane (stretching to the Conservation Area boundary) should be excluded. This area is the natural flood plain for Batchley Brook and as such – floods (within Flood Zones 2, 3a and 3b). Building so close to the Brook and its flood plain is very unwise. It will lead to future flooding. Not looking for whole of Area 5 to be excluded.</p>	<p>At present it is not proposed to develop on Area 5 and the sites chosen provide the housing Redditch requires up to 2030. Any constraints to development including that from flood risk should be taken into account in future considerations.</p> <p>It should also be noted that Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>
<p>The floodplain of Batchley Brook is clearly unsuitable for development, but might provide useful Public Open Space.</p>	<p>Noted. Area 5 is not proposed for development within the HGDS. It is important to provide open space in conjunction with the level of housing proposed. The proposed policy requires development sites 1 and 2 to "include public open space creating a permeable layout with well defined streets." (HGDS, Page 226).</p>

KEY ISSUE: Landscape

Sub Issues	Officer response
<p>Comprises discrete rolling topography and parkland character. Physically constrained by topography and frequent landscape features. Hewell Grange estate immediately to the north (Registered Park and Garden and Conservation Area), and Brockhill Wood to the east create a diversity and strength of character. Landscape quality and sensitivity is considered moderate, although there are limited views in and out of the area compared to more exposed locations.</p>	<p>Comments noted. The HGDS considers landscape issues within HGDS paragraphs 6.2.6 and 6.2.8.</p>
<p>Significant constraints to delivering large scale development. Whilst some opportunities may exist on reduced area illustrated in Fig. 10</p>	<p>Constraints for area 5 have been highlighted by the HGDS.</p>

the development footprint would be significantly reduced by the need to retain a significant green link between Foxlydiate and Pitcheroak Woods and the wider countryside to the west. Accordingly agree with conclusions drawn in paras 6.2.108 – 6.2.112.	The woods mentioned are shown on figure 9 page 96 of the HGDS. Green links are important and are acknowledged by the policy requirement that “The sites will have and overall Strategy and Management Plan for Green Infrastructure which maximises opportunity for biodiversity and recreation, whilst protecting existing biodiversity habitats and landscape geodiversity.”
The landscape of this part of Area 5 is classed as being of high sensitivity	This is noted within HGDS paragraph 6.2.8 which refers to the Landscape Sensitivity Map within the wider evidence base.

KEY ISSUE: Heritage issues, Registered Park and Garden, Conservation Area

Sub Issues	Officer response
Development of Area 5 would not adversely affect the setting of Hewell Grange.	As part of the Hewell Grange Estate – Setting of Heritage Assets Assessment (HGEHAA), the impact of the proposed development of Area 5 was assessed using the Methodology ‘Setting of Heritage Assets’. The conclusion reached was that development within this area would cause substantial harm to the setting of the Hewell Grange Heritage Assets (HAs), including the Conservation Area (CA) and the Registered Park & Garden (RPG).
Development can be designed/implemented maintaining an appropriate relationship with adjacent heritage assets.	Having assessed the impact of the development on Area 5, on the setting of the HAs adjacent to the Area, the conclusion has been reached, and detailed in the HGEHAA, that substantial harm would be caused to the setting of these assets
In the context of masterplanning work no impact on the character, appearance, significance or immediate setting of the conservation area has been identified	Notwithstanding any masterplanning work the HGDS (Paragraph 6.2.110) considers “that the potential impact on the heritage assets at Hewell Grange Conservation Area and the Registered Hewell Grange Grade II* Historic Park, raises substantial concerns as to the suitability of Area 5 to take housing growth to meet the needs of Redditch Borough.” The HGEHAA details the impact development on Area 5 would have on the character, appearance, significance and immediate setting of not only the CA but also other HAs, notably the RPG.
There would be a change to the rural landscape to the east of the conservation area, affecting the approach and wider setting. However impact to the wider setting would have relatively low significance	It is agreed that the development of Area 5 would impact on the setting of the CA to the east. The HGEHAA has only considered the impact on the setting to the east of the CA and other HAs, and not the

considering the wider unaltered landscape to other compass points.	wider setting.
Only reason why site/location not selected relates to impact on significant historic assets at Hewell Grange	Impact on significant historic assets was a key reason taken into account however the conclusions to Area 5 identify additional constraints that “development would need to overcome... including the SSSI, the Special Wildlife Site and the flood risk/ historic flooding areas associated with Batchley Brook.” (HGDS, paragraph 6.2.109).
A landscape assessment (by FPCR) concluded that impacts can be mitigated, recognising a need for revisions particularly the elevated land adjacent to Hewell Lane where a wider woodland belt should be located, the area around the Tack Farm buildings where further consideration is merited in respect of the locally visible high spot, and in respect of the siting of the proposed school, currently shown as occupying a very large site, whereby there would remain a greater distance between the school grounds and the edge of the Conservation Area at the Papermill Cottages.	The FPCR considered landscape issues, and does not appear to have examined the setting of the HAs, which was considered in the HGEHAA. The conclusion of the HGEHAA was that development on Area 5 would cause substantial harm to the setting of the neighbouring HAs, the mitigation suggested in the FPCR Assessment would not reduce this harm.
The need for the urban extension to meet sustainable social and economic development objectives outweighs the minor impact of the proposals on the historic assets	The preferred option addresses Redditch’s Housing needs whilst avoiding impact on historic assets, thus it is considered a more advantageous outcome. It is considered that development within Area 5 could have much more than a minor impact and as such raises “substantial concerns as to the suitability of Area 5 to take housing growth to meet the needs of Redditch” (HGDS, paragraph 6.2.110).
Proposals are in accordance with policy in NPPF and would only present 'less than substantial' harm on the conservation area with no harm on the Registered Park & Garden, with considerable public benefit. Suitable buffer areas can be provided and greater public appreciation of the heritage assets achieved through enhanced access by paths through the green infrastructures of Brockhill (existing) and Brockhill West (proposed).	The conclusion of the HGEHAA was that substantial harm would be caused to the setting of the HAs adjacent to Site, including the Grade II* RPG, and the NPPF states that substantial harm to such assets is wholly unacceptable. Proposals which harm the historic environment are not in accordance with the NPPF, as detailed in the HGEHAA. Section 4.9 of the HGEHAA states “The Area (Area 5) currently contributes to the significance of the HAs in forming part of the rural setting of the HAs. It is the buffer between them and the outskirts of Redditch. Screening new development with trees and hedgerow will not mitigate the fact that the buffer between the HAs and the outskirts of Redditch will be foreshortened resulting in the loss of the setting of the HAs, and therefore detracting from their significance.” There is no indication that development of this site will give greater

	access to the HAs than there currently is via the Public Right Of Way.
Not visible from most of this site and surrounded by woodland.	The CA, the Planted Hill, Southern Parkland, and some non-designated HAs are all visible from various parts of Area 5, which comprises the setting of these assets. Development on Area 5 would therefore cause substantial harm to these HAs.
On the 'Councils evidence base' the assessment has continually failed to provide an objective or accurate assessment of these settings [of the heritage assets] and of the significance and degree of harm afforded to the heritage assets. Omitted important policy requirements and ignored important sections of national guidance, giving undue weight to historic policies. Fails to present an objective, accurate, balanced or proportionate assessment. Councils' assessment is unsound for determining suitability of sites. Evidence base challengeable in respect of landscape considerations.	The Council has carried out an objective assessment of the significance of the settings of the HAs by following the methodology outlined in the EH Document 'Setting of Heritage Assets'. All policies relevant to the Historic Environment were considered. The HGEHAA came to the conclusion that the development of Area 5 would cause substantial harm to the setting of adjacent HAs. In providing a summary of policy, only those relevant were included.
The lack of objection by English Heritage to the Brockhill West proposal in the Redditch Borough Revised Draft Preferred Strategy in 2011, since when there has been no significant change in designations to justify a change of position on the acceptability of development, leads to conclude that there is no basis for an objection.	English Heritage have supported the conclusions of the HGHA. In their consultation response dated 15 th May 2013, they have stated "With regard to Site 5 English Heritage agrees with the findings of the detailed Assessment and the decision not to take the site forward, because of the potentially damaging implications for the significance of the Hewell Grange Registered Park and Garden (Grade II*) and Hewell Grange conservation area."
Council cite paragraphs from NPPF to explain assessing harm to heritage assets. Council concentrate on paragraphs which result in a conclusion of substantial harm rather than presenting a neutral approach to policy. In particular paragraphs 132, 133 and 135 of the NPPF, whilst para 134, where potential for assessing less-than-substantial harm is omitted. Indicates that prior to assessment the local authority assume substantial harm	All policies relevant to the historic environment have been considered. Following an analysis of the setting issues using the English Heritage Setting Document, the conclusion was drawn that development of this site would cause substantial harm to the adjacent HAs, and therefore in providing a policy summary, the policy was omitted as it was not considered relevant.
In quoting Local Plan policy it has been given weight equal to its standing pre-NPPF, rather than indicating that, as there is a degree of conflict within the policies and the NPPF, that they should be given reduced weight. Fails to indicate the degree of weight afforded to the draft conservation area appraisal (Bromsgrove District Council, 2010).	Local Plan Policy is not considered to be in conflict with the NPPF in respect of the issues raised here. The Hewell Grange Conservation Area Appraisal and Management Plan (Hewell Grange CAAMP) is not draft and was adopted in August 2010
Part of site 5 nearer to the Grange could be excluded. The location of	It is considered that Area 5 forms part of the setting of a number of

<p>any housing development should provide this choice.</p>	<p>HAs, as outlined in the HGEHAA, and development within the setting would harm the significance of the HAs and therefore no development should take place within this Area. The preferred options exclude any development on Area 5.</p>
<p>Under Experience of the Asset, the LA quotes Section 117 (PPS5) Historic Environment Planning Practice Guide. However, it omits final part of sentence “Nevertheless, proper evaluation of the effect of change within a setting of a heritage asset will usually need to consider the implications, if any, for public appreciation of its significance.” In other words, whilst the ability to experience an asset should not rely on the public ability to experience an asset, consideration and due weight should be afforded to the importance of those views, where public access is not easily or legally gained.</p>	<p>The HGEHAA has considered the views from where public access is not easily gained and this is examined on page 14 under the heading, ‘Views from, towards, through, across and including the asset.’</p>
<p>Several photographs utilise zoom lenses, giving undue and misleading visual reference to arguments. This is in direct contrast to professional guidelines on utilising photographs for such purposes, in particular those published from the Landscape Institute (April, 2013).</p>	<p>The photographs that have been taken with a zoomed lenses have all been clearly labelled as such. The zoomed photographs can never replace looking at the view on site</p>
<p>Paragraph 4.4 of heritage evidence states that the boundary of the RPG is loosely screened with trees. This is incorrect as the tree cover, planted as part of successive garden redesigns is considerably more than loose screening, with woodland creating over half of the boundary, including The Planted Hill.</p>	<p>This section of the HGEHAA was only looking at the Lake and Lakeside area (see Map), and the comment was in respect of the boundary between the RPG and the fields around the Batchley Brook.</p>
<p>In the heritage evidence, there is no assessment of the significance to be afforded to views, in relation to understanding and appreciating the RPG.</p>	<p>Would disagree paragraph 4.7 of the HGHEA describes the unaltered rural setting to the RPG to the South East, illustrated by the extensive views of the RPG and other HAs within their rural setting, and very limited views of Redditch and the housing at Brockhill.</p>
<p>Para 4.5 of heritage evidence is reference to the Landscape Agency Report, which describes a “rare and valuable example of Victorian modifications, enhancing rather than detracting, from an earlier landscape”. This may be true in landscape and visual terms, although the author is not qualified to respond to that, the impact of the Victorian modifications on the historic element and value of the RPG has been considerably damaged by successive landscape designers. Work undertaken during the late C19th and early C20th conflicts with much of the landscape designs created and to varying degrees</p>	<p>This is not the case, much of the Victorian work is to the west of the lake and the Brown and Repton areas, comprising the French Garden and the Planted Hill. Successive designers have impacted on their predecessors work, but the work of Brown and Repton is clearly discernible, even despite alterations carried out by the Prison Service. The work carried out post Repton is considered significant in its own right, and is highlighted in the detailed description in the Register. The later work sought to compliment the earlier garden design in some cases, eg The Water Tower is on axis with the Repton Island, in the</p>

carried out by the more important of the landscape designers involved in the Estate. To state that this is an enhancement of the historic designed landscape seems contradictory to the principal significance of the RPG	Brown lake, and is linked by the grass terraces.
Paragraph 4.8 states that rural setting of the RPG and conservation area will be lost with development of sites A and B. This statement denies the fact that a considerable amount of the rural landscape, in particular to the north, east and west, will be retained unaltered, thus preserving the majority of the rural setting.	We note the acknowledgement that the development of Area 5 (Site A) (the report has not considered Site B) will harm the rural setting of the HAs to the south east. This report only examined the impact of the development of Area 5 on the setting to the south/south east of the HAs.
Heritage evidence describes the significance of the conservation area but fails to give an indication of the contribution, or the degree of contribution this wider rural landscape makes to the significance of the conservation area	The HGEHAA considers the impact of the development of Area 5 which comprises the setting of the HAs to the south east. The level of significance is summed up in the conclusion to Step 3 of the EH setting analysis on page 15 of the Assessment.
Heritage evidence comments on elements which make up the physical surroundings of the heritage assets but continually fails to give any indication of the extent of the contribution these elements make on the significance of the heritage assets, as required to undertake such analysis in line with the English Heritage guidance.	See comment above
Degree of change includes construction of Estate buildings considered as non-designated heritage assets, but does not consider the degree to which these have impacted on the historic designs and ethos of the historic designs of the garden and parkland.	The estate buildings comprise a small number of buildings that one would expect to find on a country estate of this size and type. They have all been constructed on the edge of the estate in the parkland, and not within the more formal areas of the park, and have minimal impact on the park.
Under Experiencing the Asset, the heritage evidence finds that the RPG and CA integrate into surrounding almost totally rural landscape and states that this is particularly true at the southern end. Considering the degree of rural landscape surrounding these assets, identifying the southern end of the site as a particularly notable area of rural landscape gives undue reduced weight to the other areas, thereby creating a false impression of the lack of importance of these areas and of a heightened importance of the southern area.	On page 10 of the HGEHAA it is made clear that the scope of the study is restricted to the impact of any possible development within Area 5 on the HAs.
Heritage evidence notes a variety of views to, from, across and including the heritage assets with no indication of the significance of each of these views. Fails to consider implications for public appreciation of its significance, giving equal standing and	The photographs illustrate the rural setting and the visibility of the HAs, including the Planted Hill from Area 5. This is stated in the first section under 'Experience of the Asset' heading'. They show the proximity of Area 5 to the HAs. It is also highlighted that at the start

<p>consideration to views from Public Rights of Way as to positions within the middle of a field.</p>	<p>that Section 117 of the PPS5 Planning for the Historic Environment: Historic Environment Practice Guide, states ‘the contribution that setting makes to the significance does not depend on there being public rights or an ability to access or experience that setting’.</p>
<p>Heritage evidence claims that tranquillity and remoteness of heritage assets will be lost, failing to note that substantial elements of the rural surroundings to the north, east and west, will remain</p>	<p>This HGEHAA is assessing the impact of development on Area 5 on the setting of the neighbouring HAs. This part of the setting is highly visible, and it also forms the buffer between the HAs and the urban fringes of Redditch, without it the HAs will lose their setting and will become contiguous with the suburbs of Redditch.</p>
<p>In the heritage evidence, throughout Step 3 there are comments on effects of development, examining the alteration from a variety of views. Fails to consider the relative importance of such views, giving equal weight to all such views leading to a lack of objective assessment</p>	<p>Would disagree, the range of views illustrate the visibility of the estate as a whole from Area 5 and the immediate vicinity , and illustrate the rural setting.</p>
<p>Heritage evidence states that development would be prominent and very distracting but with no explanation of how this opinion has been arrived at and no evidence to support these opinions.</p>	<p>The HGEHAA states that development of Area 5 is likely to be prominent due to the topography of the site. The topography and nature of the views across the site from various vantage points is discussed earlier. It is not possible to be specific at this point in time as a planning application is not being considered only the principle of development on this site.</p>
<p>Throughout Other Effects of Any Potential Development in the heritage evidence, it notes there will be alterations to the skyline, but fails to indicate where this alteration will be seen from and the degree of significance to be afforded to such views.</p>	<p>Again, it is not possible to be specific at this point in time as a planning application is not being considered only the principle of development on this site.</p>
<p>Heritage evidence refers to introduction of lighting, and alterations to general character of Sites A and B changing the sites, but fails to give any assessment of the degree of such alteration, the significance of such alteration, and the degree of impact on heritage assets, and their significance.</p>	<p>Again, it is not possible to be specific at this point in time as a planning application is not being considered only the principle of development on this site. The document only considered the impact on Area 5.</p>
<p>Heritage evidence fails to identify/consider potential mitigation, which may minimise potential impact, or which may provide positive enhancement or opportunities to draw on the contribution made by the historic environment. This would help the document accord with paragraph 126 of the NPPF.</p>	<p>Page 21 of the assessment states ‘Although the topography of The Area is undulating, having assessed the topography and sightlines in detail, to and from the southern boundary of the RPG and the CA, it is considered that any development in The Area (Area 5) would intrude into the setting of both Heritage Assets’. The HGHEA does accord with Paragraph 126 of the NPPF, notably</p>

	where “they (LPAs) should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.”
Although Registered Park and Garden lies adjacent to site, the site plays a neutral role in creating the setting	The HGHEA explains in some detail why this site comprises part of the setting of the RPG and the other HAs associated with the Hewell Estate.
Use of natural topography with a robust landscape buffer, new woodland blocks and retention of higher ground and character and integrity of Batchley Brook Valley, prevent substantial alteration to the setting or significance of the park & garden	<p>This site currently forms a natural rural buffer between the HAs and the urban area. If developed the buffer, the wider rural setting of the HAs in this area, would be lost, and the significance of the HAs harmed. Planting of woodland blocks would only act as a screen and would have to be high enough to hide development. This would not only be a unnatural creation in the natural landscape, but would foreshorten the rural buffer, in term having a negative impact on the setting of the HAs.</p> <p>Section 4.9 of the HGEHAA states “The Area (Area 5) currently contributes to the significance of the HAs in forming part of the rural setting of the HAs. It is the buffer between them and the outskirts of Redditch. Screening new development with trees and hedgerow will not mitigate the fact that the buffer between the HAs and the outskirts of Redditch will be foreshortened resulting in the loss of the setting of the HAs, and therefore detracting from their significance.”</p>
Though there will be some impact on wider rural landscape the degree to which these fields form and integral and vital element is low considering landscape to the north, east and west	This part of the setting is highly visible, and it also forms the buffer between the HAs and the urban fringes of Redditch, without it the HAs will lose their setting and will become contiguous with the suburbs of Redditch, as explained in Section 4.9 of the HGEHAA, noted above.
The historic edge of the Park itself would act as an effective boundary to the north west of the site which would be well contained to the north east by the Batchley Brook and Brockhill Wood and, to the south east, by the strong ridge utilised by the B4094 Hewell Lane.	As explained in the HGHEA, this site is part of the setting of the Hewell Estate. “The setting contributes to the legibility of a historically and aesthetically important country estate, which remains remarkably intact, and therefore our ability to appreciate the significance of the RPG and the CA.”
Would relate well to existing built-up area of Redditch at Brockhill and Batchley and would have good access to supportive infrastructure; bus services, railway station, education, retail and health. Thus there is the potential for less reliance on the motor car.	This is true, but the development would cause substantial harm to the setting of various HAs including the Grade II* RPG, as explained in the HGEHAA.

<p>Development beyond the south east boundary of the Park would detract little more from its setting than the prison buildings and prison officers' housing to the north west and the A448 dual carriageway to the south, which separates the Grange from its kitchen garden.</p>	<p>See comments on page 13 of the HGEHAA. These developments were noted in the report, they clearly detract from the setting of various HAs. They were constructed at a time when government departments benefitted from Crown Immunity, and the land they occupy is comparatively small compared to the development site. On their own these developments impact on the setting of the HAs, and cumulatively their impact is even greater.</p>
<p>Those preparing the HG document have sought a landscape boundary between Batchley and Hewell Park. The officers have however ignored the most obvious landscape barrier of all, namely the edge of the park. The boundary of the registered park (as shown on figure 8, page 93 of the HG document) is very similar to the extent of the park that the author deduced from the Tithe Map for Tardebigge parish. This boundary has recently been adopted as the boundary of the Conservation Area, though this Area also incorporates two groups of buildings adjoining but outside the registered park. This accordingly represents both a longstanding and an extant boundary. This would make a robust north-western boundary for a developable area. Batchley Brook and Brockhill Wood would provide a robust northern boundary.</p>	<p>As explained in the HGEHAA, Area 5 comprises part of the setting of the Hewell Estate. "The setting contributes to the legibility of a historically and aesthetically important country estate, which remains remarkably intact, and therefore our ability to appreciate the significance of the RPG and the CA."</p> <p>The HGDS identifies strong and weak boundaries within area 5 (P228). The strong boundary along the edge of Hewell Park is acknowledged on p228 however due to the impact to the historic setting of the park it is considered inappropriate to use this boundary.</p>
<p>The desire to protect the setting of the Conservation Area is laudable, but it is suggested that the HG document is taking this to extremes.</p>	<p>The CA is not the only HAs under consideration, there is also the Grade II* RPG as well as non designated HAs on the edge of the CA. The NPPF is clear that HAs including their settings are important, and should be protected from development which harms their significance.</p>
<p>The registered park to Hewell Grange, the listed buildings therein, together with the Hewell Conservation Area and the listed buildings therein - Many of these buildings and features date from our period of interest 1837-1915 and contribute significantly to the character of the historic environment on the Hewell Estate.</p>	<p>Comments noted.</p>
<p>Any housing development in the northern-most point of site 2 adjacent to the A448 and at the top of the hill opposite Tack Farm is likely to be visible from a number of points within the registered park and conservation area.</p>	<p>Comments noted.</p>
<p>Would not support development beyond the proposed site boundaries and closer to either the Hewell Conservation Area or the</p>	<p>These constraints to the site have been considered and the preferred option of sites 1 and 2 mean impact to these assets within area 5 will</p>

registered park, where such development would have a negative impact on views out of the conservation area and registered park, and could adversely affect the setting of listed buildings in those areas.	be avoided.
The Hewell Grange estate lies in close proximity to the identified sites 1 and 2. As the only Grade 2* Registered park in Worcestershire it is essential that the historic landscape at Hewell is protected and maintained.	Comment noted, however Hewell Grange is one of 6 Grade II* RPG in Worcestershire but is the only one in Bromsgrove District
Support the landscape appraisal and Heritage Asset assessment carried out by Bromsgrove District Council.	Support for the HGEHAA noted.
Notes with approval the conclusion that development of the land immediately to the south and south east of the Hewell Grange Registered Park and the Conservation area would cause substantial harm to the setting of the major heritage assets.	Support for conclusions of HGDS noted.
With regard to Site 5 English Heritage agrees with the findings of the detailed Assessment and the decision not to take the site forward, because of the potentially damaging implications for the significance of the Hewell Grange Registered Park and Garden (Grade II*) and Hewell Grange conservation area.	Support for HGEHAA noted.
<p>The Hewell Grange Estate: Setting of Heritage Assets Assessment 2013 report states ‘The analysis carried out in this document has demonstrated that development in The Area (Area 5) would cause substantial harm to the significance and setting of major assets. The Area (Area 5) should therefore not be allocated.’</p> <p>Development in this location would have a detrimental effect on the Hewell Grange Conservation Area and Registered Park and Gardens. This area can see and therefore can be seen from the Old Papermill Cottages and the Hewell Kennels, which are both within the boundary of the conservation area.</p> <p>Support the exclusion of Area 5 (Brockhill West) from development because of its close proximity to the Hewell Grange Conservation Area and Registered Park and Gardens.</p>	Support for the HGEHAA and HGDS noted.

KEY ISSUE: Green Belt

Sub Issues	Officer response
<p>There are two possible approaches to providing a barrier between the town and the Park:</p> <ul style="list-style-type: none"> - The Green Belt boundary would be set as the boundary of the Park, with Batchley Brook and the southern boundary of Brockhill Wood, but site-specific policies would be incorporated in the Plan, providing a cordon sanitaire within which development would be prohibited. - The Green Belt boundary would be set along the less robust line of footpath 539C and the accommodation road from it to Tack Farm (boundary 2 – a strong boundary). Explanatory text would then explain that the robust line was the edge of the Park, but that the boundary had been set where indicated to provide a small strategic gap between the land released for eventual development and Hewell Park. 	<p>With the policy proposing sites 1 and 2, area 5 is not proposed for development.</p> <p>A key part of the ‘focused area appraisal’ was the assessment of the Green Belt which assessed the various NPPF purposes of the Green Belt. This involved considering the use of physical, permanent attributes on the ground. The assessment of all potential Green Belt Boundaries within area 5 have been clearly shown (HGDS, page 228). This shows strong and weak boundaries within the area. A potential developable area has been identified within the HGDS (figure 10, page 120).</p> <p>It is considered that the potential impact on the heritage assets at Hewell Grange Conservation Area and the Registered Hewell Grange Grade II* Historic Park raises substantial concerns as to the suitability of area 5 to take housing growth. The two possible approaches to identify potential boundaries for a development site are therefore considered unsuitable.</p>
<p>The south-eastern boundary of the developable area is of course a very strong one. Hewell Lane (B4096) runs along the summit of a ridge, a watershed between the Arrow and the Bow Brook. The Bromsgrove Highway (A448) parallels Hewell Lane. The only further consideration here may be that a policy will be needed that roofs should not project above the ridge.</p>	<p>Comments on the identified potential developable area for area 5 noted. However the HGDS concludes that area 5 is not one of the sites proposed for development.</p> <p>The issue of roofs projecting over ridges is noted. The proposed policy states that development should be “sympathetic to the surrounding rural areas of Bromsgrove” whilst “fully integrating into the existing areas of Redditch.”</p>
<p>Brockhill West significantly more sustainable than Foxlydiate proposals in respect of accessibility, integration with the town, landscape impact and containment and impact on Green Belt.</p>	<p>This is considered incorrect. For example, area 5 is less sustainable than area 4 in terms of impact to the historic environment. The sustainability appraisal carried out for the housing growth areas shows how developable area 4 can be viewed more sustainable than area 5.</p>
<p>This is Green Belt land</p>	<p>The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land</p>

	<p>within Redditch Borough necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.</p> <p>From the evidence contained in this Study it is clear that a thorough process has been undertaken to identify the best possible solution to sustainably meet the identified growth needs of Redditch. It is unfortunate that in order to do this, current Green Belt land has to be reallocated but government policy is clear on the need to find land to meet unmet housing needs¹, and that Green Belts can be reviewed as part of the plan making process². In an area with such significant Green Belt coverage (Bromsgrove District has 91% Green Belt coverage) these two principles (in Paragraph 182 and Paragraph 83 of the NPPF) lead to the inevitable conclusion that in order to meet unmet needs, release of some Green Belt land will have to be considered.</p>
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Bordesley (Area 8) – SUPPORT FOR DEVELOPMENT

KEY ISSUE: Bordesley as an alternative location general comments

Sub Issues	Officer response
Area 8 Bordesley should be reconsidered as a strategic site for 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.
The number of Areas allocated for future development in the Local Plan 4/Cross Boundary Growth Expansion (2030) should be kept to a minimum therefore minimizing the overall impact.	The Councils do not want to release more Green Belt land for development than is required to meet the objectively assessed housing needs.
No one Area can provide the full requirement so limit development to 2 Areas maximum. (Areas 6 & 8)	The policy proposed includes sites within Areas 4 and 6 which together meet the full requirement. Limiting the number of development areas arbitrarily would reduce the ability of the plan to provide enough land to meet housing needs.
Regeneration of area via resurrection of the North West Redditch Masterplan.	Most of the area covered by the former draft Redditch North West Master Plan area is already incorporated within the sites allocated for development within Local Plan No.4, so only limited further regeneration development is possible.
The existing building found at Bordesley to the <u>east</u> of this location, and on the Birmingham road to the north, indicates that the gap between Redditch and Birmingham (Alvechurch) is not going to get any smaller than it is at present, as both areas of existing development provide physical barriers to a Bordesley site.	It is presumed that this representation means to the west rather than east. The existing development that currently exists at Bordesley does not diminish the Green Belt gap between smaller settlements closer to Redditch, or the larger strategic gap to the conurbation and Birmingham. The physical barrier only therefore exists on this western edge of Area 8.
This site could easily be joined into the Redditch conurbation (Church Hill/Hithergreen Lane) and will not be a satellite settlement. Existing houses here have previously been classified as not being a settlement so no encroachment arguments apply.	There is no logical extension to the urban form of Redditch in this location and this is a key concern for this area. Any development within Area 8 would cause urban sprawl beyond the existing built up area more than any other area identified in the focussed area appraisal work, due to its lack of existing connectivity with the built form of Redditch.
Half (at least) of the proposed houses need to go into Bordesley from Foxlydiate.	There is no rationale for this statement. The Housing Growth Development Study explains the rationale for the two preferred sites.
Build along the new rail track	This suggestion proposes development in Area 11 and beyond , this

	was discounted for the following reasons: Local Wildlife Sites, River Arrow flood plain, impact on the Green Belt and resulting loss to the 'strategic gap' (HGDS para 6.5.78).
Development here would result in the merging with existing development at Bordesley	This area is not proposed as a preferred site at this stage so there would be no merging of development.
Potential residents of new development would prefer their houses to back onto a golf course/ country park rather than existing houses. Therefore, providing housing immediately adjacent to current existing housing in Redditch at Webheath should not be a major decision making factor	There is no evidence to back this assumption. The existence of the Dagnell End Road segregating any development opportunity from the open space in Redditch would mean that this design/layout would not be feasible
All 13 plan objectives listed in your booklet would suit Area 8 perfectly	The Housing Growth Development Study explains the rationale for the two preferred sites in relation to the Objectives. Overall the Study does not conclude that area 8 meets the Objectives perfectly.
Bordesley was designated the good place to build 3 years ago why now is it not? WYG2 concluded that Area 8 was the most appropriate for cross boundary development	Bordesley has never been designated a good place to build. A Study carried out by White Young Green (WYG Second Stage Report) suggested that Bordesley would be suitable to meet housing need. However this Study's recommendations were considered by WMRSS Phase 2 examination and not considered sufficiently robust to support a designation. As part of the current HGDS all sites including Bordesley of the WYG areas were considered as potential areas to meet Redditch's housing need. After detailed analysis it was considered that sites 1 and 2 were the most suitable.
Development here would also result in the merging with existing development at West Bordesley	There are no positive planning reasons to currently suggest merging settlements would be a reason to support development. Green Belt Policy (NPPF paragraph 80 bullet point 2) currently recommends against the merging of settlements.
Persons coming to live at Redditch will most likely have lived previously in towns or urban areas so that moving to an area like Bordesley should help them to integrate well-being urban rather than a rural area.	This is not a planning consideration.
Building on Area 8 would not be as contentious.	All potential development areas are contentious as Green Belt would need to be lost, and people live in close proximity to all potential development areas.

<p>It has been suggested that Area 8 could possibly cater for more houses than is required and that this detracts from the use of this area for the development. Is it possible to develop Area 8 with lower density, provide employment so that travel distance to work is reduced and create more open and amenity space for the use of residents?</p>	<p>This suggestion would use more Green Belt land than necessary to meet the current housing requirements. Both Councils will seek to make the most efficient use of land as possible. It is also not feasible that employment provision on site would meet all of the employment needs of area 8. There are also more sustainable employment options elsewhere.</p> <p>The Policy proposed requires any development site to include “public open space creating a permeable layout with well defined streets”.</p>
<p>Building to the north of Redditch would improve Bromsgrove’s Town centre.</p>	<p>It is unclear how development north of Redditch would improve Bromsgrove’s Town Centre.</p>
<p>If this area were to be considered in future for development, it would be open to legal challenge BECAUSE OF THE RESULT OF THIS EXAMINATION IN PUBLIC.</p>	<p>This is not the case. This Area has been discounted as the Council’s preferred option to meet growth needs up to 2030. When it is appropriate to review the Plan, and with future development requirements post 2030 in mind, this area may need to be reviewed for its suitability to meet those future development requirements. At this point in time, longer-term growth requirements post 2030 have not been identified.</p>

KEY ISSUE: Biodiversity

Sub Issues	Officer response
<p>Reduced ecology issues</p>	<p>There is no detailed Habitats and Species Survey to corroborate this. All sites have ecology issues which would need to be mitigated as part of detailed proposals.</p> <p>The Policy proposed requires any development to “protect existing biodiversity habitats and landscape geodiversity.”</p>
<p>Note very significant issues associated with likely impacts of development, especially with respect to the Dagnell Brook and other LWSs and SSSIs.</p> <p>Dagnell End Brook is a SWS</p>	<p>Noted, these constraints have been considered within the HGDS.</p>
<p>Note that large scale development here would effectively enclose the northern edge of the Arrow Valley Park, severing its link to the wider</p>	<p>Agreed, these constraints have been considered within the HGDS.</p>

<p>countryside. Agree this area is inappropriate for major development. Small scale proposals would also have to address various biodiversity, landscape and flooding issues and any development here would need to have substantial GI links to maintain connectivity between the Arrow Valley and the wider countryside.</p>	
<p>Document states there are 2 SWS adjacent to the northern boundary. Although it is realistic to mention these, they are not inside the area, and should not be seen as constraints</p>	<p>Designations within and adjacent to potential development sites have been identified for all sites.</p>
<p>River Arrow and its tributary are special wildlife sites. They form valuable wildlife corridors, linking the watersheds which flow to the River Trent and River Avon.</p>	<p>Noted.</p>
<p>A wide diversity of bird species are often observed in and around Alvechurch. These include nesting ravens, kingfishers, buzzards and other raptors, owls, all three species of woodpecker and many others. The WMRSS Sustainability Appraisal by URSUS Consulting Ltd (page 6) states “bird species provide a good indication of the states of the wildlife in the countryside.”</p> <p>The habitat of large numbers of badgers, owls, kestrels, buzzards, woodpeckers, kingfishers, crayfish, fresh water shrimps and bats would be destroyed.</p>	<p>There is no detailed Habitats and Species Survey to corroborate this. All sites have ecology issues which would need to be mitigated as part of detailed proposals.</p> <p>The Policy requires any development to “protect existing biodiversity habitats and landscape geodiveristy.”</p> <p>In any case Area 8 is not a preferred site.</p>
<p>Agricultural land</p>	<p>Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed housing needs. As the land is of a similar agricultural quality across all focussed areas appraised the loss would be equivalent in any area chosen and therefore it is considered to be only a minor constraint to development.</p>
<p>There are areas of ancient woodland.</p>	<p>The area is within the Wooded Estate Lands Landscape Character type, therefore it is expected that there could be parcels of ancient woodland.</p>

KEY ISSUE: Flood Risk

Sub Issues	Officer response
No flooding issues	It is not possible for there to be no existing flood risk issues as there

	are ditches and a watercourse and defined flood risk areas on the Area (Zone 2 and 3). If this site were to be the preferred option a FRA would be required
This area is dissected by the flood plain, providing the opportunity to reinforce the green linkages and integrate existing and new development.	With any watercourse that appears through a site, there are opportunities for GI enhancement and wider linkages are possible
Area 8 is located on Mercia Mudstone formation. There are four historic landfills and therefore appropriate land contamination assessments would need to be undertaken.	Noted, should there be a planning application received on site relevant land contamination assessments would be needed.
There is Flood Zone 2 and 3 associated with a tributary of the River Arrow (classified 'ordinary watercourse'). Flood modelling required to define developable area. Development should be located within Flood Zone 1 with sufficient protection to the watercourse corridor.	Noted this would be required on any potential sites
SuDs and demarcation of land bordering the brook as a Green corridor would aid dispersal of surface and groundwater. Link to the Arrow Valley Green corridor to the south of Dagnell End Road.	This would be required in any case because the brook is a SWS which flows to the Arrow Valley. SuDS would be required for any potential development, as required by the Councils' proposed policy.
Since the Redditch and Bromsgrove Outline Water Cycle Strategy doesn't comment on potential development at Bordesley we refer to the Royal Haskoning Report which reveals that when considering the impact of 2000/3000 houses, drainage and flooding are not seen to be a problem	The Outline WCS was completed before the cross boundary locations were analysed so it would not be included.
Area 8 is clearly a flood risk as it contains a number of tributaries of the River Arrow. Flooding at Storage Lane, Dagnell End Road/ B441 Development will compound flooding issues at the Abbey Park golf course	The extent of the flood risk would not be known until detailed Flood Risk Assessments are completed for any site. These constraints have been considered within the HGDS. However the SFRA Level 1 states that there are 'no formal flood defence structures or reports of fluvial flooding along this [Dagnell Brook]'
The fields are waterlogged as drainage appears to be very poor.	The drainage issues on site would not be known until detailed Flood Risk Assessments and drainage strategy are completed for any site.

KEY ISSUE: Green Belt

Sub Issues	Officer response
No obvious boundary to potential development in this location but it	Topography in this area is not considered to be strong enough to be

could be contained by topography	able to contain development, until Storage lane is reached at the northern extent of the area.
Bordesley greenbelt is of less natural importance than Bentley's	Natural importance is not a Green Belt purpose. All Green Belt purposes have been considered in the same way for each site in the Housing Growth Development Study. Development at Bordesley would have a greater impact with respect to 'strategic gap' reduction than development elsewhere.
<p>The proposed boundary for development would maintain a strategic gap between Rowney Green, Alvechurch and Redditch.</p> <p>The areas (sites 1 and 2) avoid building on the strategically important area of countryside in the Parish of Alvechurch which separates Birmingham from Redditch.</p> <p>Can understand the wish to avoid development in the north west of Area 8 since this is largely an open relic parkland landscape. If it were to be conserved, a benefit would be that the setting of Rowney Green would be preserved and a clear gap between Redditch and Alvechurch maintained. Thus coalescence of distinctive settlements will have been avoided.</p>	<p>There is no 'strategic' gap between these settlements, the strategic green belt gap is considered to be a much larger extent of land which prevents the coalescence of Redditch and Birmingham. In any case, proposed development on area 8 would reduce the gap significantly, especially to Rowney Green.</p> <p>Noted. See response above</p> <p>Agreed but in relation to the whole of area 8 due to the weak boundaries across the area, these matters have been considered within the HGDS.</p>
Defensible boundaries could be created by topography/ hedgerows/ tree-planting - this is a twenty year rollout	Existing defensible boundaries are always more preferable for defining long term green belt boundaries on a site to provide more certainty going forward. The HGDS has considered these constraints.
<p>Would be contained by topographical features and main roads which surround three sides of it so containing the possibility of future sprawl.</p> <p>Boundaries on Area 8 would need strengthening. Three boundaries comprise an A road, a B road and a wide country road interspersed with housing.</p>	The HGDS examined these boundaries and determined that there are few features that could contain a smaller development area.
This section is less vulnerable than the Green Belt that separates Redditch from Astwood Bank or Studley.	Neither area 8 nor the land between Redditch and Astwood Bank or Redditch and Studley has been identified as preferred options for housing growth. These areas have been discounted in the HGDS for a

	number of reasons, not least because of the coalescence of the settlements.
Boundary no. 30 on the Housing growth Development Study map is weak but only a short stretch where there is only posts and wire. Could be reinforced.	Boundary 30 is a very short section of the boundary. The existing boundary of a post and wire fence is not a particularly strong long term green belt boundary. These constraints have been considered within the HGDS.
Rejection of options north of Redditch is supported on grounds of coalescence risk with Alvechurch, sprawl, encroachment into an extensive area of countryside, and development in a location more likely to lead to commuting away from Redditch to Birmingham rather than encouraging more balanced growth within Redditch. This rejection is consistent with the conclusions of the RSS Panel at paragraph 8.82 of their report.	Agreed
The document says that there is no logical extension to the urban form of Redditch. This is an argument which could equally apply to the other areas, as they all eat in to green belt, and create odd extensions to the form of Redditch.	This is not the case. The HGDS refers to the urban form being cut off by potential development through the substantial area of the Arrow Valley Park and its links northwards. The other sites are all green belt but this is a different consideration from urban form
Document suggests that the feeling of remoteness would be increased because the area cannot be seen due to higher areas in foreground. Where exactly are these higher areas? Any undulation would likely be levelled to some extent by the developer which would mitigate this. The land rises to the North, so suggesting it would not be visible from other Redditch urban areas is a mystery.	The higher areas exist just north of the Dagnell End Road. The undulating areas start at the edge of the existing housing along Dagnell End Road and continue until after the entrance to the fishing pools. Large scale earth movements in any development are not generally encouraged, especially on such a large site.
<i>"A distinct lack of strong defensible boundaries in the area makes it difficult to determine where any development would start to encroach in to the countryside, unless weak boundaries were strengthened considerably"</i> . This is no different to Area 4, which also has weak boundaries but wording in Area 4's appraisal doesn't suggest that this is a problem. Why should it be a concern for this site? Many of the boundaries for Area 8 are actually stronger than those for Area 4.	Area 4 boundaries have been assessed in the same way as Area 8 and the HGDS explains where boundaries are stronger in parts of Area 4.
The statement that <i>'therefore in Green Belt terms no development would be preferable for this area; however for consistency further work has been done on selecting the most appropriate boundaries that could be utilised'</i> gives the impression that this factor alone has been used to make a decision against	One factor has not led to conclusions about an areas suitability. There has been extensive SA work carried out for all sites, in particular those included in the focussed site appraisal which considers a number of sustainability factors leading to the selection of sites 1 and 2.

development on Area 8, and that the further comments made in the document on the site are merely for the appearances sake. No area should be discounted on one factor alone, especially when it is a factor which is poorly matched against other sites being considered.	
A boundary can run from the mid point on the eastern boundary of HECZ148h to the north of the Fishing pools and across to Poplar Farm and Icknield Street. This would maintain a gap between housing and Storage Lane. However the suggested northern boundary of the area considered suitable for housing is set further to the south than this, with a consequent increase in the strategic gap.	The suggested boundary appears to be boundary 23 leading to boundary 4 in the HGDS Appendix 2. These boundaries have been identified as weak boundaries and are not suitable for long term green belt boundaries.
Development here would be a fundamental assault on the original green belt concept (reduction of the Redditch/ Birmingham Green Belt gap) and create a stand-alone housing estate wholly disconnected from the Redditch urban form (a connection which new sites for housing for Redditch should have).	Agree, these constraints have been considered within the HGDS.
Area 8 is a very important 'buffer' between Redditch and the urban conurbation of Birmingham. Maintain openness between Birmingham, Hopwood, Alvechurch and Redditch, if we are to respect the principle of the Green Belt and maintain the above features of our locality.	It is important in terms of the role it plays in keeping Redditch and the conurbation separate through its Green Belt purpose, as well as other settlements
The northern boundary of Area 8 (Storage Lane) is not well defined and would lead to continual pressure from developers to extend development all the way up to the M42, engulfing Alvechurch and Rowney Green	Area 8 has not been identified as a preferred location for development. Storage Lane is a strong enough boundary in Green Belt terms but the extent of development would be more than is required before it reaches Storage Lane. The HGDS has identified that there is a lack of strong defensible boundaries south of Storage Lane. Furthermore, development at Bordesley would have a greater impact with respect to 'strategic gap' reduction to the conurbation than development in other locations.
WMRSS panel report refers to this area as a "more significant gap towards Alvechurch in relation to the purposes of the West Midlands Green Belt in containing the West Midlands conurbation (pages 194/194 / paragraph 8.82)	Noted.
Either the whole area should be in the Green Belt or none of it. Officers have struggled to find any landscape barrier in this area for a	Agreed.

<p>northern boundary to an area released. The reason is clear: there is none. The only possibilities are:</p> <ul style="list-style-type: none"> - The Dagnell Brook, which is also the boundary between Beoley and Alvechurch. This runs up the eastern side of Osmerley, and thus does not offer a northern boundary. - The continuous boundary between Bordsley Park and the other two farms, between two HECZ areas (shown on figure 19, page 166 of the HG document) – HECZ 148h and parts of HECZ 148c. However, the release of the whole of this would take the edge of Redditch far unacceptably close to Rowney Green. It would therefore virtually remove the strategic gap between Redditch and that village. 	
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KEY ISSUE: Infrastructure – Education

Sub Issues	Officer response
Alvechurch and Bordesley were always historically linked to Redditch Schools in the past	This is not a planning matter which relates to the release of land for development.
Bordesley has better access to schools in both Redditch and Bromsgrove.	In terms of distance to schools Area 8 is closer to Middle and High schools than some areas, like Site 1, but no closer to first schools. The accessibility to these schools will vary depending on the school and public transport available. Travel Plans for any site will be needed to ensure accessibility is improved, especially by public transport.
Current provision 6.4.27 of the Study. It should be noted the absence of Abbeywood and St Stephen's	This paragraph refers to the closest first school which is Beoley First school, so these other schools would not be mentioned.

KEY ISSUE: Infrastructure – General

Sub Issues	Officer response
Reduced noise issues	If the respondent is suggesting there would be less noise issues after development, this is not likely to be a significant issue in any of the focussed sites which would weigh in favour of one site over another. However if the respondent suggests there are currently less noise issues, this will be dependent on where within the site a noise assessment is taken, as some parts will be more tranquil whilst others such as near the Birmingham Road/Scrap yard will be noisier.

Impact on local services will be intensified by proposals to largely concentrate the build on a single site. It will be mitigated only by provision of new facilities or by spreading need over a number of locations to access existing resources. In this event, Area 8 is in closer proximity and has better road and direct transport links to the increasingly supportive healthcare roles provided by Birmingham, Coventry and Warwick.	This has been considered. The impact on facilities around Redditch would be more dispersed if a pattern of growth in many areas were to be chosen and this has its own drawbacks. Local healthcare would be considered to relate to Redditch as this is where the majority of people access their GP surgeries. In terms of other healthcare from areas further afield, there are potential accesses to strategic road networks on many of the focussed sites, therefore this is not a reason to weigh in favour of one site above another.
The conclusion for Area 8 section 6.4.85 states: <i>“It should be noted that the nearest facilities are within Bromsgrove District and this may work against the primary objective of providing sustainable development for Redditch’s needs”</i> This statement does not comply to Strategic Objective 2.1 Item 3: “To support and enhance the vitality and viability and, where appropriate, the regeneration of Town Centres, District Centres and other centres in both Bromsgrove District and Redditch Borough” which encompasses Bromsgrove as well as Redditch.	The facilities like schools, local shops, healthcare etc are more likely to be things that are not generally solely contained within a Town Centre, so the aim of ensuring there is good access to facilities is different to finding a scheme which could provide benefits to the Town Centres.
There is an existing High Pressure National grid gas main across Area 8. It could be modified to provide an immediately available gas supply to the site.	Domestic properties would not connect to the local high pressure gas mains that runs across the site. There are Low pressure and Medium pressure mains that run along the edges of Area 8 and gas supply is not considered to be an issue on any of the areas.
Bordesley is closer to Redditch water supply distribution/network and is a more cost effective and sustainable solution.	On any site, water supply is not considered to be an issue which would constrain or prevent development , and there are no particular reasons why Area 8 is more favourable in this respect.
Bordesley closer to primary electrical supplies that serve Redditch i.e. the Ipsley Primary Sub-Station.	On any site, electricity supply is not considered to be an issue which would constrain or prevent development.
Bordesley closer to the main Redditch Telephone exchanges and telecom infrastructure. This is a more cost effective solution and is also better in terms of deliverability and sustainability.	There are no issues with access to telecom or broadband infrastructure on any of the broad appraisal sites which would constrain or prevent development, and there are no particular reasons why Area 8 is more favourable
The Roman road (Ryknild Street) most is a narrow country lane and is part of the sign-posted Avoncroft Cycle Way which leads to the city.	Noted.
Incorporate footpaths and cycleways. Whilst significant investment in walking and cycle infrastructure to provide accessibility is anticipated	There are always going to be site constraints that make walking and cycling more difficult in parts of large sites, but these can be designed

<p>this would also be the case at Site 1 where topography is less accommodating.</p> <p>Area 8 will require significant investment in walk and cycle infrastructure.</p> <p>Topography would facilitate the provision of cycling routes and footpaths</p>	<p>in a way to make them more accessible. Agreed that the policy can be improved to ensure that development provides the best solutions to overcome this.</p> <p>ACTION: Amend either the Policy, third bullet point to include reference to safe walking or cycling routes, or ensure there is reference to site level requirements elsewhere in the BDC plan.</p>
<p>Developer has completed some of the necessary assessments and engaged in discussion with Council and utilities about planning. Likely that Area 8 could be brought forward for development earlier than Site 1.</p>	<p>Not all necessary assessments have been submitted to the Councils. There are however ongoing discussion between the Councils and a number of infrastructure providers, including utilities providers. There is no evidence submitted to suggest that area 8 can be brought forward earlier than site 1.</p>
<p>There are three public rights of way within the area. These footpaths provide opportunities for potential residents to have good access to the Arrow Valley Park and local facilities.</p>	<p>Noted, there are footpaths in and around many of the potential sites which link to a number of areas within Redditch urban area.</p>

KEY ISSUE: Infrastructure – Health

Sub Issues	Officer response
<p>If the Alex Hospital is down graded, emergency services can get onto the M42 in a couple of minutes.</p> <p>In consideration of the reduction of services at the Alexandra Hospital (including reduced A & E), and the likely transfer of some NHS services to University Hospital Birmingham, it would make more sense to build these houses in Bordesley.</p>	<p>The Councils have had no response from emergency services or the NHS on this matter, however the strategic road network can potentially be accessed very easily from any of the focussed sites that have been appraised.</p>
<p>Faced with somewhat less unfavourable proximity for Area 8, the Study is able to conclude emphatically that “access to healthcare is poor with the nearest GP surgery approximately 2.85 km away”. The Study lacks consistency in its Area assessments of the accessibility of health services. Surely the prognosis for Area 4 and Area 8 “is poor”.</p> <p>The area is 4km from the services/facilities within Alvechurch and</p>	<p>It is noted that the closest existing GP surgery to Area 4 is 3.7km. The reference to area 8 having ‘poor access’ is relevant given that there is only one link onto the strategic road network in this location. If it is required new or extended GP surgeries can be provided alongside any proposed site.</p>

<p>5.1km to Redditch Town Centre. Access to health care could be improved if a medical facility were provided on site.</p> <p>HGDS section 5.97 states: “<i>meaning that there are very few services and facilities within walking distance</i>”. This statement refers to Area 8 and could be deemed accurate as the distance to the school is 3km, the GP surgery 2.9km and Alvechurch local centre 4km, however a similar statement does not appear in section 5.61 referring to Area 4 when the distance to the school is 3km (the same), the GP surgery 3.7km (further away), limited retail facilities in Webheath 3km (post office and grocers) and Batchley District Centre 4km (the same). No area is more favourable than another.</p>	<p>Distance to services/ facilities are identified as a weakness for both Areas 4 and 8 in the HGDS Executive Summary.</p>
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KEY ISSUE: Landscape

Sub Issues	Officer response
Undulating hills are self contained and do not spoil the landscape	Unsure how undulating hills can be self-contained. There are few areas in Area 8 that are undulating
A landscape which is comparatively flat	This is correct but it makes this area difficult to visually contain
<p>Area 8 is only medium landscape sensitivity</p> <p>Only Medium Landscape Character, defined as not an undue constraint to choosing this area for development (Ref to Bromsgrove GI report)</p>	<p>Whilst it is preferable for development to occur in areas of low sensitivity all of the land around the periphery of Redditch is of medium or high sensitivity and therefore the medium sensitivity of this area is not an undue constraint that weighs heavily against the choice of this particular area.</p> <p>Furthermore, development in this location would be visually prominent due to the openness of the landscape and poor internal boundaries.</p>
Outside Landscape Protection Area and Area of Great Landscape Value	These designations are no longer relevant, as Areas of Great Landscape Value were revoked with the abolition of the Structure Plan, and Landscape Protection Areas whilst being saved policies, have been superseded as it is now considered more appropriate to use the landscape character assessment.
Agricultural land quality no higher than 3a. Development of the Bordesley Site would avoid the adverse effect on the Government’s target for sustainability on food. (Government target is 85% but our	The land bounding the River Arrow has a greater than 60% likelihood of being best and most versatile (BMV) agricultural land. Beyond this the remainder of the area has between 20.1% and 60% likelihood of

<p>current UK level is 64% !)</p>	<p>being BMV agricultural land. As land is of a similar quality across all of the areas of focused appraisal, the loss would be equivalent in any area chosen and therefore it is considered a minor constraint to development. Although the Government does encourage food production, the NPPF guides Local Authorities to meet their objectively assessed needs.</p>
<p>Area 8 looks inwards to Redditch as opposed to looking out towards the Malvern's and the Cotswold's</p>	<p>This is not a valid reason to constrain development</p>
<p>The developable area of Bordesley sits in the Redditch bowl mitigating the impact on landscape.</p> <p>Would it not be more in keeping with their (Bromsgrove) philosophy to place the houses in the 'Bowl of land ' in area 8 which overlooks the 'Bowl' that Redditch sits (Built Form and Rural and Visual Landscape Appraisal - Bromsgrove. 2002)</p>	<p>ASK BDC</p>
<p>From the majority of area Redditch can be seen, and only on the furthest Eastern section can distant views of the country side be seen - minimally obtrusive into the wider landscape</p> <p>Site not visible when coming into Redditch from Alvechurch/ Bromsgrove as it sits behind higher ground of Rowney Green. It is no more visible from Redditch than any development would be on Area 4.</p>	<p>These comments concern landscape setting within area 8 looking out and not from a wider area looking in. The WMRSS panel report did acknowledge that there would be wider visual issues with this area. Panel Report para 8.82 states: <i>"In landscape terms we can appreciate that when looking north from Redditch the greater part of the Bordesley park area would be contained within ridge lines while some of the areas in and adjacent to ADRs would be on or close to ridge lines. However, the situation is not as clear-cut as that as, from some viewpoints nearer Alvechurch, parts of the suggested Bordesley Park land would be in clear view and, conversely, there are some areas of ADR and adjacent land that appear well contained in landscape terms."</i></p>
<p>The Redditch Borough Council Open Space Needs Assessment 2009 states that the West (adjacent to Area 4) is well catered for with a surplus of 4.81ha/1000 population but Abbey (adjacent Area 8) is poorly provided for with a deficit of -1.86ha/1000 population. Development in Area 8 would enable more open and amenity space to be provided</p>	<p>Irrespective of the development area, the Policy will require 'public open space creating a permeable layout with well defined streets'.</p>
<p>Development here will not result in the loss of Worcestershire countryside</p>	<p>Development within any of the focussed areas would constitute a loss of 'countryside', and area 8 is no exception.</p>

<p>It could equally be said that Redditch Golf Club acts to separate Webheath/Foxlydiate from Redditch Town.</p> <p>The Arrow Valley Park dissects Redditch in two already so to suggest that development at Bordesley would be any more difficult to integrate into the urban area is not a valid comment. Residents on a Bordesley development would be closer to the Town Centre than those in either Matchborough or Winyates, so it could be argued they would be more integrated.</p>	<p>Webheath area is still connected with built development in the vicinity of Birchfield Road.</p> <p>The proposed development area at Bordesley would sever the green links into the wider countryside from the park in a way that would affect the urban form. It is different with the former New Town areas because the park has a linear feature which is bounded by the built up areas, it doesn't flow into wider countryside.</p>
<p>Much is made of various HECZ sites although the majority of development proposed by the developer does not spread in to these areas.</p> <p>Masterplan content is ignored when considering this site. Unfair to suggest that resulting impact on views to or from Rowney Green is of more importance than to or from other areas</p>	<p>The HECZ covers all of area 8, and also all of the other 20 areas that have been analysed. They are not designations, they are character zones.</p> <p>Master plans of one site do not provide information that is useful for doing a comparative analysis of sites, although officers are aware of the plans.</p>
<p>The precious value of the countryside in the Parish of Alvechurch (and Bordesley Park in particular) is confirmed in a letter sent to me on 4th August, 2009 from Mr Peter Langley, retired Deputy Director of the Government Office of the West Midlands, after the close of the Examination in Public of the West Midlands Regional Spatial Strategy Phase Two.</p>	<p>Noted, these constraints have been considered within the HGDS.</p>
<p>We have read in the HGD Study (Area 8) that the development in the southern half can be visually contained (Page 172 paragraph 6.4.81). Development here would be extremely damaging to the special rural view from Redditch Crematorium (Grid Reference SP 0430 6880). This building has been so sited that surprise rural panoramic views open up to mourners when they enter the hall and as they make their way out. The potential development would destroy the views and deprive mourners of this unexpected asset.</p>	<p>Noted.</p>
<p>Most of the hillsides which surround Alvechurch Parish and the upper Arrow Valley with those of its tributary, the Dagnell Brook are designated as areas of Great Landscape Value or Landscape Protection Areas. Insensitive development could greatly damage or destroy the landscape, on the skyline as well as elsewhere while</p>	<p>These designations no are longer relevant, as Areas of Great Landscape Value were revoked with the abolition of the Structure Plan, and Landscape Protection Areas whilst being saved policies have been superseded as it is now considered more appropriate to use the landscape character assessment. The Landscape character</p>

there are a large number of other environmental, archaeological and historical features concentrated here.	assessment has been considered in the HGDS.
When descending the hill from the Bordesley Hall/Rowney Green crossroads driving eastwards, there are spectacular views which would be destroyed by the Area 8 development.	Noted, these constraints have been considered within the HGDS.

KEY ISSUE: Sewage Treatment

Sub Issues	Officer response
More sustainable for sewage etc (see attached report from STW), (a gravity feed for waste and storm water)	Sewerage treatment is only one aspect of sustainability. Although it is of course likely that STW's preference for sites to be located where the costs to STW are lower, there are other considerations that lead to the selection of the preferred sites of 1 and 2.
Lower co2 levels than Foxlydiate/Webheath, lower electricity costs than having to pump sewage etc.	There are no significant Co2 emissions differences between options around the Redditch area. Pumping sewerage which may be required elsewhere does not require significant electricity generation
Additional works at Bordesley estimated to cost only £100,000 Mainly to east of River Arrow – easier drainage	To check if this is right It is not correct that drainage by gravity would be taken from points to the east of the River Arrow; it would be relevant from points along the ridgeline which starts along the A448 at the north of Site 1.
The area in Bordesley is well drained	This is unknown until a detailed assessment is completed

KEY ISSUE: Sustainability

Sub Issues	Officer response
2 miles from Redditch Town Centre for jobs and accessibility Routes to the Town Centre are more direct and an easier option for walking.	The distance from the centre point of Area 8 to the Town Centre is 5.1km or 3.2 miles. The routes to the Town Centre are well established from the edge of the area but it is beyond a reasonable walking distance and this is reflected in the HGDS.
A main supermarket within 1 mile	The nearest supermarket is 1.5miles from the centre point of Area 8.
Close to Abbey Stadium	Abbey Stadium is 2.21km from the centre and the south western part is 1.45km away. This has been considered within the HGDS.
The location will also ensure that the new population will use Redditch rather than Bromsgrove because of its location	Whilst it is difficult to prescribe how or where people will prefer to shop or access facilities, because the growth locations are all adjacent to

	<p>Redditch it can be presumed that the majority of residents in any area will use Redditch facilities, however there are more opportunities for Bromsgrove Town Centre use with Site 1 being taken forward as an allocation.</p>
<p>Link in cycleways with secure lockers at station - all these are environmentally friendly.</p>	<p>The enhancements to the railway stations are not related to this HGDS consultation, however such improvements are being sought through the CHYM project or through Network Rail's enhancement of the Alvechurch link to Redditch and associated improvements. Improvements are also being sought through the Infrastructure Delivery Plan in relation to cycle parking, improved signage to encourage trips to the railway station and cycle storage at the railway station.</p>
<p>Close to Abbey Stadium and Leisure facilities such as Abbey park Golf, several Churches, DIY, Fire Station, crematorium, existing employment opportunities, places of interest like Abbey Meadows, newly built Hotel and public houses and eating places</p>	<p>Agreed, this has been considered within the HGDS.</p>
<p>Development at Bordesley would centralise Town Centre facilities geographically</p>	<p>This is not a consideration which would favour development in any location</p>
<p>The spending power of residents in this area would keep the Kingfisher Centre viable.</p>	<p>The population increase will help to sustain services and facilities throughout Redditch, irrespective of the location.</p>
<p>The area is 5.1km from Town Centre. This is incorrect. From centre of site, train station 3.7km (car) 3.2km (foot), town centre car parks 4.18km, Church Green by foot 2.8km.</p>	<p>Distance measurements were measured from a central point within the site. This approach was taken to encourage consistency between areas considered. This means that parts of area 8 will be closer to facilities including those mentioned by respondents. The opposite is also true some parts of area 8 will be further away than the quoted distances.</p> <p>The distances quoted by the respondent may measure these distances in a different way.</p>
<p>Likelihood of a heavy reliance on car transport realistically less than for Area 4</p>	<p>The HGDS states that development could encourage commuting to Birmingham where the economic benefits would manifest. Closer proximity to motorway junction could facilitate this by car. It is however unrealistic to suggest that a move away from car use will be altered, but public transport has potential to be more easily integrated into Site 1 than Area 8.</p>
<p>Last paragraph of Area 8 section insinuates that residents may use</p>	<p>Not necessarily. The HGDS merely points out the proximity to</p>

<p>Alvechurch facilities instead of Redditch. This is an example of how incorrect distances result in false judgements. Alvechurch is stated as being 4.04km, which against the documented figure of 5.1km to Redditch, could suggest it supports using Alvechurch services. When the real distance figure for Redditch Town Centre of 4.1km is used, the argument is much weaker. Is it realistic to assume someone would shop at Alvechurch with limited facilities/services, when the Kingfisher Centre with a huge array of shops and services is on the doorstep and a superstore exists just down the road?</p>	<p>Alvechurch services and facilities to area 8 (para 6.5.25).</p> <p>Distance measurements from area 8 were measured from a central point consistent with other areas. This approach was taken to encourage consistency between areas considered. This means that parts of area 8 will be closer to facilities including those mentioned by respondents. The opposite is also true some parts of area 8 will be further away than the quoted distances.</p>
<p>There is less likelihood of the suggested regeneration happening at Bromsgrove than might have been the case at Site 1 but the benefits for Bromsgrove are only speculative and, since the development is for Redditch housing stock, it is appropriate that this impact should be felt in Redditch.</p>	<p>Whilst it is difficult to prescribe how or where people will prefer to shop or access facilities, because the growth locations are all adjacent to Redditch it can be presumed that the majority of residents in any area will use Redditch facilities, however there are more opportunities for Bromsgrove Town Centre use with Site 1 being taken forward as an allocation.</p>
<p>The assessment of Area 8 in relation to accessibility to local facilities fails to fully take account of the Church Hill local centre which is located within walking and cycling distance of the site. This area is currently being redeveloped which will increase the facilities and amenities in the area. As indicated above, Area 8 can deliver a local centre on site which could include retail, education and medical land uses which will reduce the need to travel outside the development.</p>	<p>Para 6.4.31 of the HGDS addresses the facilities at Church Hill District Centre. Furthermore, redevelopment of Church Hill District Centre will not increase facilities and amenities in the area.</p> <p>Development in any location will address the needs for additional local facilities and area 8 is not an exception to this.</p>

KEY ISSUE: Transportation - Funding

Sub Issues	Officer response
<p>Taylor Wimpey, when they submitted their planning application for 200 dwellings at Webheath were informed there is a Worcestershire CC Transport/Highways Levy of c£3,000 per dwelling. Developing at Bordesley always raises the question of a possible bypass being built and then who will pay for it etc. If you received £3,000 for 2,000 dwellings it gives you £6 million, which is a good starting point for future consideration. Development at Brockhill East, East of the railway line will provide a new roundabout at Weights Lane/Birmingham Road all adding to reasons why this area should</p>	<p>The Transport Infrastructure evidence for both Councils is in draft, but it does not include the Bordesley Bypass as a highway scheme that is needed to support development. Therefore it is not appropriate to collect through S106 or future CIL for a scheme that is not required. The building of the bypass is not considered to outweigh the issues on the site, particularly as the bypass is not necessary for any developments across the two Council areas.</p> <p>The roundabout east of the railway line on Weights Lane has planning</p>

<p>be re-considered for development purposes.</p>	<p>permission associated with the Weights Lane scheme, and is not therefore related to Area 8 being delivered.</p>
<p>Gallaghers have already offered to pay to extend the already existing by-pass</p> <p>Development here could potentially encourage progression of the Bordesley Bypass, alleviating current traffic congestion.</p> <p>Whilst the Bordesley By-Pass does not necessarily have to be constructed to allow the development of Area 8 it would be beneficial in that it would reduce existing traffic flow at Dagnell End Road junction.</p> <p>Understand that developer liaising with officers has planned mitigation measures on the Dagnell End Road and has set aside land and an appropriate contribution towards building the Bordesley bypass. This should satisfy to a large degree the WCC requirement that funding for delivery of the bypass must be developer led.</p> <p>Bordesley Bypass could mainly be carried 'off line' ensuring little disruption to the travelling public</p> <p>Area 8 is defined by four roads and the impact of traffic would be focussed particularly on two of them rather than on a single dual carriageway and a network of small lanes as in Site 1. The A441 especially the Dagnell End Road junction which is the busiest in Redditch will need work to cope with the extra traffic generated by any development. A Bordesley Bypass could contribute to mitigation measures by diverting, easing and regulating traffic flow.</p>	<p>The Transport Infrastructure evidence for both Councils is in draft, but it does not include the Bordesley Bypass as a highway scheme that is needed to support development. The building of the bypass is not considered to outweigh the issues on the site, particularly as the bypass is not necessary for any developments across the two Council areas. This could impact on the viability of the site and potential for other infrastructure provision on site.</p> <p>This response has been sent to WCC for comment (last para)</p>

KEY ISSUE: Transportation – Public Transport

Sub Issues	Officer response
<p>Excellent bus services</p>	<p>The site is undeveloped like other potential sites and therefore does not benefit from excellent bus services through the site. From the</p>

	centre point of the site, there is an unreasonable walking distance to the nearest bus stop.
Provision of public transport will be cheaper in this location	Area 8 would require a new bespoke bus system which would be costly, whereas in other locations existing networks could be enhanced and expanded.
Bordesley has better rail links	Alvechurch rail station and Redditch rail station are closer to Area 8 than some other areas looked at in the detailed site appraisals. This would still be encouraging travel to the stations by car and out commuting.
There is a new railway station construction in Alvechurch to provide additional service to Area 8. Why is this not mentioned in the "Housing Growth Background Document-January 2013".	Although Area 8 falls within Alvechurch Parish, there is no new railway station construction to serve area 8. The proposed enhancements at Alvechurch station will have a positive impact on rail services to and from Redditch as a result of the passing loop and the frequency of trains from two to three per hour. This doesn't impact more significantly on any particular growth proposal for Redditch than others.
<p>Opportunity to construct new railway platform to allow commuters travel to Birmingham or Redditch town</p> <p>Planners could encourage the siting of another railway station at Bordesley</p> <p>A case could be made for an intervening station as part of the rail upgrade project</p> <p>The close proximity of future development to Alvechurch and Redditch stations was an important consideration to Network Rail when making the decision to enhance Redditch Branch. Redditch Station is a similar distance from both Area 4 and Area 8) only 0.5km difference) and so a deciding factor on the sustainability of each area when considering rail travel is the distance to Alvechurch Station.</p>	<p>Improvements to increase trains to three per hour between Redditch and Birmingham will increase the service for commuters. An additional station is considered an unviable option and the need for additional stopping points between Redditch and Alvechurch is unnecessary.</p> <p>The proposed enhancements at Alvechurch station will have a positive impact on rail services to and from Redditch as a result of the passing loop and the frequency of trains from two to three per hour. This doesn't impact more significantly on any particular growth proposal for Redditch than others.</p>
Good potential links into the wider Redditch pathway and cycleway system	Para 6.4.18 of the HGDS takes the footpath network into account.
Concentration of development at one location closest to the town	Distance to the Town Centre is not the only determining factor when

<p>centre offers the maximum potential to improve and integrate public transport links.</p>	<p>identifying development locations. Area 8 would require a new bespoke bus system which would be costly, whereas in other locations existing networks could be enhanced and expanded.</p>
<p>Rail access to destinations for employment outside of Redditch</p>	<p>Although Area 8 falls within Alvechurch Parish, there is no new railway station construction to serve area 8. The proposed enhancements at Alvechurch station will have a positive impact on rail services to and from Redditch as a result of the passing loop and the frequency of trains from two to three per hour. This doesn't impact more significantly on any particular growth proposal for Redditch than others.</p>
<p>Area 4 is located adjacent to the National Cycle Route 5 which is part of a long distance cycle network through England & Wales as stated in section 6.1.26. Area 8 is located adjacent to the Regional Cycle Route 55, which runs along the southern border of Area 8 on Icknield Street, which is part of a local cycle network from Redditch to Kings Norton as stated in section 6.4.23. Part of section 6.4.47 of the Housing Growth Development Study states: "<i>Area 8 will also require significant investment in walk and cycle infrastructure in order to provide the necessary level of accessibility to/from the area and to maximise the use of sustainable modes of transport from the site</i>". This statement applies equally to Area 4 as evidenced by the closeness of cycle routes to each area.</p> <p>Significant investment no different to Area 4 or any other sites. For some reason the potential high cost of this is mentioned for this site but not for others.</p>	<p>Access to cycling and walking routes are comparable for both areas. Route 55 of the Regional Cycle Network was considered as part of the HGDS (para 6.4.23). Area 8 would require more investment to improve the public transport network than site 1.</p>
<p>If bus route 52 were to be extended into Area 4 this could as easily be extended into Area 8 as the service also serves Bordesley</p> <p>Other routes that could easily be diverted into Area 8 are numbers 146, 182, 183, 517 & 519</p> <p>In relation to the public transport the indication is that Area 8 would require a costly bespoke service. However the Church Hill area is served by several public transport routes, with some routes operating</p>	<p>WCC have indicated that area 8 would require a new bespoke public transport system.</p>

along Icknield Street and adjacent to Area 8. There is the potential that these services can be diverted into the site. Therefore this site can be accessed via public transport without the need for a bespoke newly commissioned route.	
It is suggested that as the centre of the site is 1.7km from existing bus stops, this is beyond reasonable distance. This is not an argument against development, as such a scale development would include bus stops at numerous points	This is not used as an argument against development, it forms part of the analysis of all sites.
It states the area is 4.3km to Redditch Train Station when measured on a map. Using footpaths alongside roads, the distance is actually 3.7km.	Distance measurements for all areas were measured from a central point. This approach was taken to ensure consistency between areas considered. The distances quoted by the respondent may measure these distances in a different way.
Pedestrian access to Alvechurch Station from Area 8 is remote. From the far end of which, the walk is at least 1 hour 15 minutes with a sizeable hill in the way. The approach to Alvechurch Station and the size of the forecourt does not easily lend itself to access by bus.	Para 6.4.25 of the HGDS recognises that this is beyond a reasonable walking distance.
Limited public transport	Noted. This has been considered within the HGDS.

KEY ISSUE: Transportation – Road Infrastructure

Sub Issues	Officer response
Not country lanes as in Webheath/Foxlydiate	Disagree. There are similar country lanes within and around all sites.
Bordesley is located within 10 mins of the M42, close to the motorway network for jobs and accessibility. Document does not mention the fact that the location of area 8 makes it ideal for linking to the M42, without creating major traffic issues elsewhere, as will occur with other sites Access to highways to destinations for employment outside Redditch. Irrespective of construction of the Bordesley Bypass, area located close to A441 therefore good and varied access to range of major roads including M42S, M42N and M40	Agreed that this site is well placed to access the motorway network. However, there are sustainability concerns about allocating a site that will encourage out-commuting by car.
Adequate roads and highway infrastructure locally	The existing road network would need improvement to support development; this is true of all potential development sites.

Access for the Area 8 development site in Dagnell End Road is easy	Access is direct to the Strategic Road Network for the focussed site areas.
All modes of transport would be reduced in terms of distance	It is assumed this comment refers to the distance from existing facilities within Redditch, this has been considered as part of the HGDS.
Opportunity to build a bridge to allow a Northern link to Brockhill	There is already an access via Weights Lane which would be upgraded to enable development at Brockhill.
Plans & cost were made during the Atlantic Beacon project to make a single track road from Sainsbury's to the island south of Alvechurch to alleviate the bottle neck at Dagnell End	Noted. The planning permission for the Bordesley Bypass has now lapsed.
Existing residents / commercial enterprises - most will benefit from better transport links	Such benefits could be achieved on all potential development sites.
Windsor Rd is a bottleneck with the bridge for Birmingham area traffic, A441 north of Sainsbury's is a bottleneck	The transport infrastructure evidence completed by Worcestershire County Council and Halcrow, takes account of this and recommends improvements to the network to mitigate the cumulative effect of the development in the area.
The access to Redditch Town Centre from Bordesley is mainly by dual carriageway not impacting on built up urban areas.	All potential development sites can access the Town Centre via dual carriageway.
Bordesley benefits from wide, free flowing main roads with little or no farm machinery movement or equestrian usage.	Disagree. There are agricultural and equestrian businesses within the site that use the surrounding roads. This constraint is not specific to Site 1 only.
The by-pass would enable raw materials to be easily transported to Redditch and finished goods to be easily transported by the motorway system via junction 2 of the M42, to markets in other parts of the country and abroad.	All of the sites subject to focused site area appraisal have potential access to the strategic road network.
The Travel Destination from Development Areas map highlights that around 46% of traffic will be destined for locations other than Redditch/Bromsgrove, in fact around 32% of the traffic is expected to travel to Birmingham based locations anyway, wherever the final development sites are located. The statement for Area 8 does not take account of the Travel Destination study, and is being used to prejudice the reasoning behind the discounting of Area 8 for development.	This Map does not display percentages. All sites have been considered equally with regards to transport evidence; for Area 8 this is detailed in paragraph 6.4.45 and for Area 4 this is detailed in paragraph 6.1.44 of the HGDS.
Development in this location is likely to exert pressure on the	Noted. The HGDS takes this into consideration.

A441 and the A435 northwards thereby exerting some pressure on the Strategic Road Network.	
The small roads of Icknield Street, Storage Lane, Watery Lane and Lilley Green Road are unsuitable for increased traffic volumes. Access to Redditch town centre is only via a bottleneck at the western end of Dagnell End Road.	Noted, it is likely that every potential development site may require upgrades to the existing road infrastructure to cope with increased traffic volumes.
Traffic gridlocks as a result of M42 closures	Noted, this is not unique to the M42 or Redditch.

KEY ISSUE: Historic Environment

Sub Issues	Officer response
There are listed buildings along Storage Lane and Icknield Street that would also come under threat.	This has been considered in the HGDS (paragraph 6.4.68). Listed buildings have a statutory protection, however the presence of them does not necessarily preclude development.
There are many places of historic and archaeological interest in this sector of the green belt which are listed in the Register of Worcestershire Countryside Treasures (Feb 1973), in a report by Dr Della Hooke, Birmingham University 1989/90, for Worcestershire County Council and the Countryside Commission and in the Historic Environment Record of the Worcestershire Archive and Archaeological Service. The area between Dagnell Brook and the river Arrow with Storage Lane on the north constitute the manor of Osmerley. This was given to Bordesley Abbey in the mid-12 th century and remained part of the abbey demesne until the dissolution of the abbey in 1539. It was then transferred by the crown to the Windsor family (later Lords Windsor and then Earls of Plymouth), and became known as Bordesley Park. It was sold during the Interregnum the wealthy ironmaster Thomas Foley and remained in his family until the early 19 th century. The area became divided into Bordesley Park, Bordesley Park Farm and Lower Park Farm. The whole area thus has a historical integrity. Site of Medieval hunting park.	All relevant historic assets have been identified from the Historic Environment Record and taken into consideration in the HGDS.

Bordesley (Area 8) – SUPPORT FOR EXCLUSION OF SITE

KEY ISSUE: Reasons to exclude Bordesley general comments

Sub Issues	Officer response
RSS examination in public Inspector found against developing Bordesley	Noted, the WMRSS Panel Report considered the recommendation of Bordesley as the preferred location for cross boundary growth (WYG 2), however felt the study was not sufficiently robust to support a detailed designation at Bordesley. The Panel Report concluded that Bromsgrove Council should determine the choice of locality around the Redditch boundary to accommodate around 3,000 dwellings to meet Redditch growth (paras. 8.82 - 8.84).
Development will destroy the rural character of Rowney Green	Noted, this has been taken into account in the HGDS (paragraph 6.4.58).
<p>The area is used on a regular basis by ramblers, cyclists and horse riders.</p> <p>There are multiple riding stables in the Area 8 that provide recreation.</p> <p>A fishery has been established within Bordesley Park.</p>	Noted, these are common uses in all semi-rural areas and therefore in all of the potential development sites.
Evidence that two of the large fields at the northern end of Area 8 are subject to a restrictive covenant which forbids building within sight of Storage House.	From a legal perspective, it is possible to vary or revoke restrictive covenants with consent of the beneficiaries via a deed of variation/revocation.
Support for the SWOT analysis in the Housing Growth Executive Summary	Noted.
Many of the listed houses in area 8 have their own supply of Well water which could be contaminated by seepage from building in the area.	Development would not be permitted to contaminate water sources.
Development at Bordesley is not envisaged as part of the Alvechurch Neighbourhood Plan for at least the next 15 years or so and is premature to planning for the housing needs of BDC and Alvechurch Parish	Noted, however Neighbourhood Plans must be in conformity with the Development Plan which must plan to meet the objectively assessed housing needs
Very large number of visitors who come from the city, Redditch and even from overseas, to enjoy the varied informal leisure activities,	Noted.

giving great economic and social value to this very narrow sector of the green belt around Birmingham.	
The Worcester and Birmingham Canal. Fishermen are often seen along its banks. Several local boatyards hire narrow boats for holidays. This attracts many overseas visitors who enjoy the distant rural views across the valley as they set off on their tour	Noted.
Bordesley Abbey Visitor Centre and Forge Mill Museum are on the southern side of the disparked medieval Bordesley Park, just within Redditch Borough.	Noted.

Area 11 - Support for exclusion of Area 11

KEY ISSUE: Support for exclusion of Area 11 - General

Sub Issues	Officer response
Support exclusion due to Area 11 including a section of the Worcester and Birmingham Canal and Shortwood Tunnel. Reduced Area 11 included land at risk from flooding associated with Cofton Reservoir, Upper Bittel and Lower Bittel Reservoirs	Agreed. The larger area 11 was discounted at the Broad Area Appraisal stage, partly because it includes a significant number of environmental designations including the Canal section. The reservoirs noted are at least 2 miles north of the site and risk of flooding is likely to be much higher from the River Arrow which flows through the site. The extent of the flood risk would not be known until detailed Flood Risk Assessments are completed for any site.
In light of various significant constraints Area 11 is not appropriate for large scale development	Agreed, constraints within area 11 have been noted within the HGDS. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. These sites also have very few constraints in terms of environmental or historic designations.

KEY ISSUE: Area 11 as an alternative location - General

Sub Issues	Officer response
Area 11 could be utilised Area 6 brought forward. As Area 6 is proposed, it's difficult to understand why Area 11 hasn't, especially when developer's proposals demonstrate a viable option for housing and employment which would improve sites sustainability credentials. Shares may advantages of Area 6 adjacent.	Area 11 has been assessed on its own merits and although it adjoins area 6 it contains other constraints that are not found within area 6 - for example potential flood risk from the River Arrow and lack of strong and defensible Green Belt boundaries to take the required growth. Development in area 11 would be less sustainable than the proposed sites 1 and 2.
Smaller area 11 could be utilised, including a route for the Bordesley Bypass.	The Transport Infrastructure evidence for both Councils is in draft, but it does not include the Bordesley Bypass as a highway scheme that is needed to support development. Therefore it is not appropriate to collect through S106 or future CIL for a scheme that is not required. The building of the bypass is not considered to outweigh the issues on the site, particularly as the bypass is not necessary for any developments across the two Council areas

<p>Though parts more appropriate for employment uses it's rejected on the grounds that Redditch is well supplied at Winyates Green, Gorcott and Ravensbank. Housing equivalent stated to be 537 dwellings and the identified area is sufficiently enclosed so that the impact on Green Belt potentially reduced. Could be brought forward for delivery within five years.</p>	<p>For the purposes of this cross boundary work, no additional cross boundary land for employment purposes is required.</p> <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. These sites also have very few constraints in terms of environmental or historic designations. As such it is considered unnecessary to release any land within area 11 (para 6.5.83) for housing.</p>
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KEY ISSUE: Flood Risk

Sub Issues	Officer response
<p>In Area 11 the majority of the area is located on Mercia Mudstone formation, Secondary Aquifer. There is an authorised landfill (Weights Farm) that would require consideration (see comments for site 2). There is Flood Zone 2 and 3 associated with the River Arrow (classified Main River'), plus smaller tributaries. Development should be located within Flood Zone 1 with sufficient protection given to the watercourse corridor.</p>	<p>Landfill by Weights Lane noted.</p> <p>The extent of the flood risk within area 11 would not be known until detailed Flood Risk Assessments are completed for any site. These constraints have been considered within the HGDS. Flood Zones 2 and 3 and noted as constraints to development.</p>

KEY ISSUE – Landscape

Sub Issues	Officer response
<p>Landscape impact in area identified for potential on the openness of the Arrow Valley makes it highly unattractive</p>	<p>Landscape and Topography of area 11 is considered within section 6.5.6 of the HGDS which states it is located in "<i>an area of high landscape sensitivity risk</i>". This level of risk is similar to the other areas subject to this Focussed Area Appraisal, therefore sensitive design would be required to mitigate the impact on the landscape. That the majority of the eastern section of area 11 is flat being the River Arrow flood plain is also noted.</p> <p>Whilst it is preferable for development to occur in areas of low sensitivity, all of the land around the periphery of Redditch is of medium or high sensitivity. However, area 11 is not proposed for</p>

	development.
Wedge of land between Butler's Hill Wood and the railway should be excluded. If this is left as a scrap of otherwise useless land as a result, plant it with trees as an extension to the wood	Whilst considered in the focused area appraisal, the area of land described has been excluded for housing development. Furthermore, area 11 was not proposed for development as part of this consultation. In addition as the land is privately owned both local authorities have limited control over planting trees on the land.

KEY ISSUE: Transport

Sub Issues	Officer response
<p>Poor judgments used relating to the encouragement of travel to Birmingham for Area 11. As with Area 11, residents will travel to their place of work regardless of location</p> <p>To suggest that 'development in this location will encourage travel by car more than some of the other areas being appraised' may be a true, but there are other sites (Area 4) which would necessitate car travel more - wording used infers it may be the worst location but it is not.</p>	<p>True, the location of site will not stop residents from travelling to their place of work however it is considered that area 4 is more likely to attract residents who work in Redditch than further afield.</p> <p>This incorrectly quotes the HGDS. The study doesn't claim area 11 will encourage travel by car <i>more than</i> some of the other areas. Wording used within the HGDS (para 6.5.26) is justified as "<i>the majority of services and facilities are beyond a reasonable walking distance</i>". Thus "<i>it is considered that development in this location would encourage travel by car</i>". This wording used doesn't necessarily suggest area 11 is the worst site for this issue.</p>
<p>No mention for Areas 8 or 11 of Bordesley Bypass</p> <p>Areas 8 and 11 include a bypass at developers cost, providing significant improvement to the highway network and improvement in conditions for the residents at Bordesley.</p> <p>Development at any other site would add to traffic flows on the A441 (approx.7% of destinations from new development would be to Longbridge, 8% to Birmingham City Centre/Selly Oak/University all of which would be likely to utilize the A441), so the ability to have this part of the highway network upgraded/improved at no cost to the tax payer should on its own merits be a prime factor for supporting development here</p>	<p>The Transport IDP for both Councils is draft, but it does not include the Bordesley Bypass as a highway scheme that is needed to support development. Therefore it is not appropriate to collect through S106 or future CIL for a scheme that is not required. The building of the bypass is not considered to outweigh the issues on the site, particularly as the bypass is not necessary for any developments across the two Council areas.</p> <p>Even with a guarantee that a bypass would be provided it is unclear at this stage whether this would impact on other requirements for a scheme, such as affordable housing or design and build standards.</p>
<p><i>"There are a number of narrow country lanes which would require</i></p>	<p>This quote is taken from the broad site appraisal within the HGDS</p>

<p><i>significant upgrading to accommodate additional traffic flows. This could mean there may be significant infrastructure costs". Why is this factor not mentioned in initial appraisal for Area 4 which has just as many narrow country lanes, as does Webheath?</i></p>	<p>(para 5.136). An existing infrastructure deficiency was acknowledged at the broad site appraisal for area 4 (para 5.64). Notwithstanding this, both areas 4 and a reduced area 11 were considered to be worthy of further consideration for a focused site appraisal as the study has comprehensively considered a number of strategic objectives for each site.</p> <p>The fact that narrow lanes were not specifically mentioned does not mean the factor was not considered in all the focussed site appraisals. Access to potential development may mean that narrow country lanes are not necessarily required as access points. The exact details of the new transport arrangements will not be known until a detailed Transport Assessment is undertaken.</p> <p>In addition to this transport modelling work on various scenarios for locations of cross boundary development was commissioned in November 2012. This modelling work concluded that development in area 4 is likely to exert the main pressure on the A448, the Slideslow roundabout and the A38 running north to Junction 1 of the M42. This does not mean there will be no impact on the surrounding lanes and that significant improvements will not be required. The impact on highways infrastructure is not seen as a barrier to development (HGDS, paragraph 6.1.45).</p>
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KEY ISSUE: Sustainability

Sub Issues	Officer response
<p>Site close to Redditch Town Centre and all its services, yet still the distances stated are questionable.</p> <p>Not enough is made about the location in relation to Abbey Stadium. Where it says it is 1.4km away, parts of 11 are only a few tens of metres away.</p> <p>The Town Centre is easily reached on foot.</p>	<p>Distance measurements from area 11 were measured from a central point within the site, which is consistent with other areas. This approach was taken to encourage consistency between areas considered. This means that parts of area 11 will be closer to facilities including those mentioned by respondents.</p> <p>The HGDS acknowledges that certain facilities are within walking distance of area 11 (para 6.5.30) which could encourage healthy</p>

	lifestyles. However it is considered that the majority of services and facilities are beyond a reasonable walking distance.
Is it really considered that residents would travel to the limited shops and services in Alvechurch, when a Sainsbury's superstore, the Kingfisher Centre and other facilities are literally down the road from this site?	Not necessarily. The HGDS merely points out the proximity to Alvechurch services and facilities to area 11 (para 6.5.25).

KEY ISSUE: Green Belt

Sub Issues	Officer response
Concerns of coalescence are raised where the area runs north towards Alvechurch and Bordesley. The distances between the northern most tip of the area is significantly further away from Alvechurch than the tip of Area 4 is to Tardebigge where coalescence not considered a problem.	In the HGDS assessing area 4 paragraph 6.1.53 raised the concern that part of the "part of the area could merge with Tardebigge to the north, Banks Green and Upper Bentley to the west." Issues of coalescence were then considered in the assessment for area 4. It is not considered that the proposed developable area, site 1, would cause coalescence with Tardebigge. Similar issues were raised with area 11 in terms of impact to Alvechurch and Bordesley (paragraph 6.5.55). A wide range of issues were considered in the HGDS which led to sites 1 and 2 being chosen as the most sustainable option.
The new bypass could also create strong Northern boundary.	Existing defensible boundaries are always more preferable for defining long term green belt boundaries on a site to provide more certainty going forward. The HGDS has considered these constraints. Any bypass through area 11 is unlikely to provide a northern boundary.
To suggest that ribbon development of Bordesley is relevant to coalescence is hypocritical considering southern boundary of Webheath ADR contains ribbon development. Eastern side of Area 4 contains ribbon development along Foxlydiate Lane but this is not considered.	The point made in the HGDS at para 6.5.55 is on the basis that development in area 11 would lead to coalescence with Bordesley. Ribbon development is mentioned because that is the nature of the small settlement at Bordesley. Webheath would not be impacted in terms of coalescence as it is already part of the larger Redditch urban area as is the development along Foxlydiate Lane.
If the reserve option of an extension of the area beyond the ridge to	The HGDS considers the ridge, within area 6, to be of value in

the pool in the valley bottom were adopted, it would be natural to extend it north to Butler's Hill Wood.

reducing the risk of encroachment within the Green Belt. It is also considered that development beyond the ridgeline would lead to encroachment (HGDS, Paragraph 6.3.60). A reserve option for development beyond the plan period to 2030 is not currently being considered.

Housing Growth Consultation – Consultation Responses

Miscellaneous

KEY ISSUE: Support for development

Sub Issues	Officer response
The best solutions from the evidence provided by RBC and BDC Officers are to either develop Areas 4 (Foxlydiate) and 6 (Brockhill East) or Areas 6 (Brockhill East) and 8 (Bordesley). I believe these options are the only two that should in any form be considered further. I support either of these two options.	Noted, however 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.
The sites suggested are considered to be appropriate because they offer an opportunity to develop sustainable urban extensions which are well connected to Redditch town centre by improved public transport provision and new cycle links.	Noted
The level of growth directed towards site 1 is considered to be sufficient to allow the provision of day-to-day facilities to meet the needs of local residents and reduce the need to travel, the requirement to provide a primary school is of particular note.	Noted
Site 2 is considered to be a natural extension to the existing Local Plan allocation and the requirement for it to be integrated with that site is welcomed as this will allow residents to benefit from new services and facilities in order to reduce the need to travel.	Noted
The sites selection has clearly considered other sites and a Sustainability Appraisal has been prepared to look at the sustainability implications of all of the sites considered including those which form the preferred option and the basis for consultation.	Noted
There is likely to be sufficient land available within Flood Zone 1 ('low probability') for both preferred sites, where development is appropriate in line with the Technical Guidance to the National Planning Policy Framework (NPPF).	Noted
We have no objection in principle to these proposals for development of sites 1 and 2, as specified in the consultation documents	Noted
Acknowledge the Councils requirement to identify land for new	Noted

Sub Issues	Officer response
housing and employment and the assessments indicating these may be the most sustainable locations.	
Impressed with the joint working of the two local authorities and would have accepted the outcome from such an apparently unbiased process.	Noted
The suggested outcome seems entirely logical as an extension to Redditch's need for housing	Noted
A failure to work together negates either Councils Local Plan given the lack of available land in Redditch	Agreed, the Councils are working together to meet Redditch's growth needs
This positive approach to accommodating Redditch's needs which cannot be met within its own boundaries is welcome.	Noted
The sites identified for development appear to have been chosen on the basis of thorough environmental and accessibility assessment, consideration of Green Belt policy objectives and consideration of infrastructure requirements.	Noted

KEY ISSUE: Alternative locations for development

Sub Issues	Officer response
Are the Council sure they have investigated every avenue in cross border chats with e.g. Stratford District Council? What evidence is there of meaningful and full discussions with Stratford in line with the Localism Bill.	Both Redditch and Bromsgrove Councils consider they have fulfilled the requirements of the Localism Act in terms of the duty to cooperate. Stratford on Avon District Council was consulted on the HGDS which considered and assessed areas within Stratford District for potential to meet Redditch Housing needs.
Area 6 (Brockhill East), Area 8 (Bordesley), Area 11 and a reduced capacity Area 5 (Hewell / Tack Farm) could between them cope with housing growth required and would sensibly spread the load across the four areas.	The advantages of "spreading the load" of housing growth across a number of sites was considered within the HGDS (paragraph 8.12). 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.
Weights Lane and Bordesley, straddling the A441	This location relates to Area 11 which was considered within the HGDS. It was considered that " <i>development within Area 11 is not suited to large scale house building due to the limited ability to constrain development and control urban sprawl in the Green Belt</i> "

Sub Issues	Officer response
	(HGDS, Paragraph 6.5.83).
<p>Bromsgrove land between Church Hill and Beoley</p> <p>Land to the east of Church Hill bordered by the B4101 Beoley & A435 Portway (the Beoley triangle) has potential for development</p>	<p>This location relates to Area 10 which was considered in the Broad Appraisal in the HGDS. It was considered that <i>“development in parts of this area would mean that Beoley would merge into Redditch and cause significant harm to the Conservation Area and associated Listed Buildings”</i> (HGDS, Paragraph 5.129).</p>
<p>Area 5 - Hewell/Tack Farm</p>	<p>HGDS Paragraph 6.2.110 states <i>“It is considered that the potential impact on the heritage assets at Hewell Grange Conservation Area and the Registered Hewell Grange Grade II* Historic Park, raises substantial concerns as to the suitability of Area 5 to take housing growth to meet the needs of Redditch Borough.”</i></p>
<p>Area 1 - Crabbs Cross to Astwood Bank</p>	<p>Area 1 was discounted at the broad site appraisal stage due to the advantages being greatly outweighed by the disadvantages, for example <i>“significant Green Belt harm caused by coalescence of Redditch and Astwood Bank”</i> (HGDS, paragraph 5.31).</p>
<p>Studley</p>	<p>The areas surrounding Studley (13, 14 and 15) were discounted at broad site appraisal stage for a number of reasons including significant Green Belt and environmental implications (HGDS, paragraphs 5.165, 5.177, 5.189). These areas are within Stratford-on-Avon District who will plan for the level of growth for Studley.</p>
<p>Beoley:</p> <ul style="list-style-type: none"> * Develop an area which has good existing road infrastructure and links to major A-roads. * Develop an area which already has schools close. * Develop an area which already has good public transport links. * Develop an area which is close to the town centre in order to reduce transport costs on the environment. * Develop an area which is close to existing leisure and sporting facilities. * Develop an area which is already on National Electricity, Gas and Water networks. * Develop an area which would also allow expansion in the future whilst being cognisant of all the above. * Develop an area which has the least impact on the FEWEST 	<p>These comments relating to the development of Beoley are relevant in terms of assessing the sustainability of an area, however there are more issues to consider when assessing a site for example the impact to Green Belt, Environmental and Historic constraints which are also relevant to developing around Beoley. The methodology used in Section 3.14 for the focused sites addressed some of the issues that have been mentioned:</p> <ul style="list-style-type: none"> • Road Infrastructure, Schools & Public Transport – Para 3.19 Accessibility. • Town Centre, leisure and sport – Vitality and viability – Para 3.19 & 3.22. • Existing infrastructure networks – Infrastructure Capacity – Para 3.24. • Allowing future expansion – Green Belt Assessment section starting

Sub Issues	Officer response
number of residents	<p>paragraph 3.29 follows government guidance in ensuring that “existing and new [Green Belt] boundaries are durable beyond the duration of the plan period.</p> <ul style="list-style-type: none"> • Fewest impacts on number of residents. It is considered that development which is the most sustainable should be pursued, the impacts on residents are considered by assessing the various aspects of sustainability.
Why is east of Redditch ignored? Employment land is mostly on the east side. It would make sense to build where people live, if you believe businesses will set up in Redditch	The east of Redditch hasn't been ignored. Areas 15, 16, 17, 18, 19, 20 and 10 (HGDS, page 16, map 1) are situated on the eastern side of Redditch and although some of Redditch employment is located on this side of the Town they were discounted at the Broad Area Appraisal stage.
<p>Why is there only one location proposed by Redditch and Bromsgrove when other sites deemed by your planning department to be more suitable?</p> <p>If Bromsgrove have to supply the land it could be spread across several sites. Why isn't it proposed to share these allocations around the Bromsgrove/Redditch border?</p>	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 successfully integrate into the built form of Redditch and cause least harm to the Green Belt. These sites also have very few constraints in terms of environmental or historic designations. Full details of why these sites were chosen can be found in the Housing Growth Development Study.
Why have areas such as Bradley Green, Callow Hill, Feckenham been ignored?	Callow Hill was considered as part of areas 2 and 3 of the study and discounted. Stand alone settlements in the rural south were considered to be unsustainable.
Development in Studley area which could give Redditch better transport link North and East as well as providing that community with the reopening of the fire station, full utilisation of the High School with Warwickshire children, a combined interest in the future of the Alexandra hospital, more high quality housing in Studley, etc.	This area was discounted in the HGDS pg 48-49 due to significant green belt and environmental considerations including coalescence of settlements and significant flooding issues.
<p>Consider developing in Catshill area and the west side with suitable motorway screening and perhaps a new motorway junction on the Kidderminster road.</p> <p>Build at Maypole</p>	A key concern with these suggestions is that they are poorly located to serve the needs of Redditch in contrast to sites adjacent to the town which were the consideration of the HGDS (Paragraph 5.9). This is also relevant to the suggestion to have a larger number of smaller developments dispersed throughout Bromsgrove.

Sub Issues	Officer response
<p>Build at Wychbold</p> <p>Build at Throckmorton</p> <p>Much of the Redditch' allocation might even be able to be constructed on Bromsgrove land on the edge of Birmingham</p> <p>May be an opportunity to build on Brownfield Sites in Bromsgrove (e.g. the old British Leyland Site). Have these options been investigated and is there any reason why development must be on the fringe of Redditch?</p> <p>A larger number of smaller developments of 100-200 homes - for which you would then need 15-30 could be accommodated by extending villages and smaller communities across the Bromsgrove and identify one/possibly two sites for a mini-new town</p>	<p>Development is also occurring in surrounding districts to meet the needs of other localities. For example Bromsgrove district has land for 4,500 dwellings to meet its needs to 2022; this includes a development site at Catshill for 80 dwellings. Within Bromsgrove the location of development follows the settlement hierarchy meaning larger settlements receive the highest growth. If development to meet Redditch's need was placed in another location within Bromsgrove or another surrounding district it would result in disproportionate growth of up to 3,000 dwellings in such settlements.</p> <p>It is considered that development adjacent to Birmingham would serve Birmingham's needs rather than Redditch. The British Leyland Site, presumably referring to the Longbridge Works, is part of the Longbridge Area Action Plan which is already undergoing substantial regeneration and is contributing to Birmingham's growth needs by providing new housing.</p>
<p>Move it to a more appropriate and fitting area where it lends itself to a new development of such a size</p> <p>With regard to the proposal for the development of 3000 in one place, I refer to David Cameron's comments saying the government didn't want sprawling estates tacked onto villages.</p>	<p>The HGDS has considered reasonable alternatives to the proposed sites and the study considered that site 1 and site 2 are acceptable for housing development as they are the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p> <p>The proposed policy suggests two sites to take the 3,400 with the larger site 1 taking a minimum of 2,800 dwellings. The concern of sprawl is noted and credence was given to this issue as part of the HGDS in terms of proposing Green Belt boundaries.</p>
<p>If a small-scale, focussed approach was applied to 20 areas around Redditch, within the smaller 'pockets', development could be identified meeting criteria for sustainability etc. This would spread the 'load' and impact to existing areas all around the borough, enabling more organic growth and infrastructure. Encourage small-scale development all round the town's margins and small-scale and innovative building enterprises. More people can live close to the town, enjoying access to facilities there and be within easy distance</p>	<p>All 20 areas around Redditch were considered and assessed to ascertain their suitability to incorporate Redditch Housing Growth. A number of areas were discounted at the Broad Area Appraisal stage for various reasons including harm to Green Belt and other constraints leading to them not performing well in terms of sustainability and leading to the conclusion of being discounted.</p> <p>The advantages of spreading Redditch housing growth across a</p>

Sub Issues	Officer response
<p>of the countryside. To drop whole, new, artificial 'communities' in one or two large areas ruins irrevocably the environment and distorts the natural process of urban growth.</p> <p>Build several smaller areas in Bordesley, Brockhill/ Weights Lane, Dagnell End Lane, Icknield St towards Church Hill. Would cause less intrusion and upset, be evenly spread. Plus Infrastructure costs will be tremendously lower.</p> <p>May wish to consider breaking up the sites across 4 sites for example to allow for better social integration and early delivery of much needed housing</p> <p>The advantage of a small number of houses in each of the areas would give no sudden rise in infrastructure needs and allow for small expansion of existing facilities as needed.</p> <p>The benefit of multi-site use is that, if the number of dwellings projected to be necessary was proved during the plan period to be over-generous, development could be phased on chosen smaller sites without committing a single large site to planning blight.</p>	<p>number of sites was considered within the HGDS (paragraph 8.12). It is clear from the Sustainability Appraisal carried out that Area's 8, 11 and 5 do not perform as well as Site 1 and 2. It is considered that the most sustainable sites have been chosen.</p> <p>It is agreed that artificial communities should be avoided with a view to encouraging a vibrant community. The proposed policy suggests that <i>"All development must be of a high quality design and locally distinctive to its surrounding rural and urban character, contribute to the areas identity and create a coherent sense of place."</i></p> <p>The requirement for 3,400 dwellings is likely to have a cumulative impact on Redditch infrastructure even if dispersed around Redditch.</p> <p>Phasing of development sites will ensure that housing is built over the plan period. With the two cross boundary sites included Redditch has adequate land for its housing needs for 2030. In examining the 20 sites around Redditch a whole host of issues were considered including impact on environment and issues with encroachment into the countryside which could lead to blight.</p>
<p>Build specialised housing for the growing older population. Has less environmental impact and releases family homes that are needed</p>	<p>Housing for the elderly can have the same level of environmental impact as other housing. However the need for this type of housing is covered elsewhere in the two Councils' emerging plans.</p>
<p>Move recreational green spaces to the edges of Redditch and accept that it has a higher than average proportion of green spaces within the urban boundary</p> <p>The municipal 9 hole golf course in Plymouth Road is relocated to Site 1 and the course is redeveloped for housing; excellent access, proximity to town centre, rail and bus travel. Site is roughly equivalent in area to Site 2 or Crumpfields Lane Plan No.4. A Municipal Golf Course on Site 1 retains Green Belt and reinforces</p>	<p>It is considered that the Green spaces within Redditch perform a vital function of the Town's Green Infrastructure and encourage healthy lifestyles within the Town. Moving these assets in place of housing is not considered a suitable option.</p> <p>The golf course contributes to Redditch's sports and leisure provision in a sustainable central location, it also has substantial constraints in terms of tree coverage and a Local Wildlife Site designation, and as such it is considered inappropriate to develop.</p>

Sub Issues	Officer response
<p>separation between Bromsgrove & Redditch.</p> <p>Brownfield development</p>	<p>All of the brownfield land that is capable of being developed to meet Redditch's housing need is detailed in Redditch's Strategic Housing Land Availability Assessment (SHLAA).</p> <p>There are still some brownfield sites in Redditch that are available for development, however due to other factors they may not be capable of coming forward for development soon (in the next five years).</p> <p>The SHLAA identifies brownfield sites for around 266 dwellings and a further 205 estimated of brown/greenfield mixed sites. This equates to about 525 dwellings on brownfield land for the Plan period (2011-2030), which will equate to 8.2% of the total strategic housing requirements.</p> <p>During the last Plan period (1996-2011) 51.3% of completions were on brownfield land – this exceeded the Structure Plan target of 25%. So far, during the current Plan period (2011-2030) 86% (54 dwellings) have been completed on brownfield land.</p>
<p>Brownfield development in the Green Belt in addition to smaller scale periphery sites</p>	<p>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; there is no brownfield Green Belt land in either of these locations. Brownfield land within the Green Belt can perform Green Belt functions equally as well as greenfield land. Brownfield land is also assessed against the same Green Belt criteria as greenfield land. This approach will be followed if or when future Green Belt reviews need to be undertaken.</p>
<p>Redditch needs economic investment to sustain jobs and underpin housing demand.</p>	<p>Agreed. Alongside proposed housing development Redditch Borough Council is making provision for 55 hectares of land which is available for employment use for the period up to 2030. The sites identified in the Employment Land Review are capable of meeting a range business needs, and present a balanced portfolio of available sites. It includes the Eastern Gateway initiative, which incorporates land within</p>

Sub Issues	Officer response
	both Bromsgrove and Stratford-on-Avon Districts and office provision within some of Redditch's Strategic Sites.
The full extent of Area 18 includes a significantly larger tranche up to the A435. Should be considered suitable for additional residential development.	The HGDS (Paragraph 5.15) states that <i>"A review of the A435 and adjoining land also concludes that development potential exists on land in the A435 corridor both within Redditch and Stratford on Avon District"</i>
Winyates Green Triangle land is more suitable for residential development.	Disagree. The Winyates Green Triangle is considered more suited to employment land especially as it will form part of the Redditch Eastern Gateway. This location has also been identified as an Economic Game changer by Worcestershire County Council.
Area 14 would infill land between the settlements of Redditch and Studley.	This area is not considered appropriate for development in the HGDS as the area <i>"has the important Green Belt function of preventing the settlements of Studley and Redditch from merging"</i> (Paragraph 5.177).
Areas 9 and 10 lie adjacent to each other. The south-western section of Area 9 and western section of Area 10, both with access to Ravensbank Drive, would be suitable residential development. It would enhance local facilities at Church Hill and Beoley and could be designed sensitively.	These areas were not considered suitable due to coalescence of Beoley and Redditch and the likely significant harm to the Conservation Area and associated Listed Buildings. In addition to this, 'The Mount' Scheduled Ancient Monument is located in the western part of Area 10 which is an added constraint (HGDS Paragraphs 5.116 and 5.129).
<p>Area 1 and 2 together has opportunities to enhance local services and facilities. Green Belt harm minimised as there would be a gap to Feckenham. An area this size could sustain public transport so can overcome this concern.</p> <p>Strong objections to the development of the entirety of either of Area 1 or Area 12 as they would remove the strategic gap between Redditch and Astwood Bank, but we consider that: A few hundred houses might be accommodated on the fringes of the town between Evesham Road and the Slough. We appreciate that this is mostly in the Warwickshire parish of Sambourne, and thus strictly outside the scope of the consultation. Similarly a few hundred might be located immediately south of Dagtail Lane. We appreciate that there is no obvious strong boundary in this case.</p>	These areas were not considered suitable due to significant Green Belt harm, in terms of leading to coalescence with Astwood Bank, and lack of close and easy access to Redditch Town Centre (HGDS for Area 1 Paragraph 5.29, for Area 2 Paragraph 5.43 and for Area 12 Paragraphs 5.145 and 5.149).
Encourage modification of existing run-down Council owned	An initiative such as this would not necessarily require specific

Sub Issues	Officer response
<p>properties in Matchborough, Winyates, Oakenshaw, Church Hill etc. to 1B/2P & 2B/3P flats to reduce the need for new affordable housing.</p>	<p>planning policy and could come forward via the Housing Strategy Team. Whilst this suggestion presents a credible option for increasing the affordable housing stock, it is unlikely that the full objectively assessed affordable housing need will be met based on the housing requirement of 6400 dwellings. This situation will not therefore offer opportunity to reduce the housing requirement.</p> <p>Redevelopment of the former New Town District Centres (Local Plan policy 33) offers the opportunity to increase the affordable housing provision, as has been demonstrated through the recently approved planning application for Church Hill District Centre.</p>
<p>Bromsgrove need to consider more manageable tranches of housing – using existing resources. In planning terms, traffic will be accommodated better by being distributed around the network rather than in one development location (which needs a lot of capital).</p>	<p>Bromsgrove and Redditch authorities have worked together to identify the most sustainable location for housing development to meet Redditch's Needs.</p> <p>Worcestershire County Council (WCC) have completed transport assessments which recommend the highway improvements that are needed to support the two sites for development (with an understanding that all of the proposed development sites within Redditch and within Bromsgrove also come forward during the plan periods).</p> <p>There is a need for highway improvements to support the two proposed cross boundary sites if they are to be developed sustainably. The highway improvements needed are detailed in the supporting evidence base.</p> <p>Highway improvements will be predominately paid for by the developers.</p>
<p>Build in Arrow Valley (which drains by gravity)</p>	<p>Development within the Arrow Valley was ruled out at an early stage within the HGDS as <i>“it forms an important part of Redditch’s sports and recreation provision”</i> (Paragraph 5.13). In addition the area contains important ecological and historical designations.</p>
<p>A new settlement away from Redditch would meet housing needs whilst avoiding coalescence</p>	<p>A new settlement was considered as a possible option to meet or contribute towards meeting Redditch’s housing needs to 2030. The</p>

Sub Issues	Officer response
<p>Dovehousefield farm at Hunnington as a new settlement. It has strong defensible boundaries and avoids coalescence plus there is infrastructure in place</p>	<p>HGDS concluded that this was not be the most effective way of delivering sustainable development not least because the area would be poorly located to serve the needs of Redditch. In addition the proposed sites 1 and 2 avoid any coalescence between settlements.</p>
<p>Dismissal of area 10 at an early stage before viability testing is unfortunate. It may reveal the need for smaller, easier sites to accommodate the housing shortfall.</p>	<p>The Broad Area Appraisal considered all 20 areas around Redditch and looked at the various constraints to development. It was considered that <i>“development in parts of this area [10] would mean that Beoley would merge into Redditch and cause significant harm to the Conservation Area and associated Listed Buildings”</i> (HGDS, Paragraph 5.129).</p>
<p>Study too quickly dismissed land south of Redditch in Area 12, where there is considerable frontage development on the north side of the Slough in Stratford. Additional land could be allocated on this north side of the Slough without detriment to the broader Green Belt around Redditch. Such release would have only limited impacts on landscape, agricultural land, and Green Belt. A number of parcels of land are suitable, available and deliverable in the short and medium term within the plan period in Area 12 including Rough Hill Rare Breeds.</p>	<p>The HGDS noted that on the north side of The Slough is a SSSI and any development in this location could be detrimental to this asset. In addition development on this site has the potential for coalescence with Astwood Bank (HGDS, Paragraph 5.153).</p>
<p>The western segment of area 4 which contains land owned by my Clients should be included in land to be allocated for future residential development. The analysis in the Housing Growth Study too easily dismissed this western segment without proper analysis of its characteristics. It would provide both defensible boundaries to the Green Belt but also help protect important woodland. There would be no less encroachment into the countryside than any other land being currently designated. The land at Twin Oaks, Curr Lane is suitable, available and deliverable.</p>	<p>The Western Segment of area 4 is not required to contribute towards Redditch Housing Needs to 2030. The Western segment is more remote than the areas being proposed for development. It is noted that <i>“any development on this section represents development beyond strong boundaries in particularly Gypsy Lane, meaning there would be an element of encroachment into the countryside”</i> (HGDS, Paragraph 6.1.64).</p>
<p>Understand that 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.</p>	<p>Bromsgrove District Council is also aware that Birmingham City Council may require assistance in achieving their housing target. The amount of development required is not yet known. It is therefore considered that cross-boundary growth in relation to Birmingham can be addressed through the full Green Belt Review proposed within Bromsgrove's emerging District Plan.</p>

Sub Issues	Officer response
<p>Parcels of land at Longbridge, Kings Norton and Druids Heath areas are ripe for development, which could realise approximately 2,000 to 3,000 new dwellings.</p>	<p>Land is currently coming forward for Housing in Longbridge as identified within the Longbridge Area Action Plan. The locations mentioned are potentially more suited to contribute to Bromsgrove or Birmingham's housing needs.</p>
<p>Note Redditch's desire to maintain its unique structure incorporating a high proportion of green space, reflecting its New Town Master Plan but the gross land take-up of peripheral development will be significantly higher than would otherwise be the case</p>	<p>The requirement to ensure that housing is delivered which meets the objectively assessed need, combined with the acute shortage of land within Redditch Borough necessitates the release of Green Belt land, within Bromsgrove adjoining Redditch.</p>
<p>The map attached to the 2010 Redditch Growth Consultation leaflet defines how generous planners are in allocating land as open space and parkland within Redditch. Can recognise a conflict of ideologies – New Town Planning versus Green Belt provision - which has been resolved by Redditch discounting development in the town's green spaces and choosing instead to encroach into the surrounding Green Belt.</p>	<p>The open spaces within the urban area of Redditch are a legacy of the New Town design and as such incorporate important historic features and environmental designations. In addition, they provide opportunities for recreation.</p>
<p>Suggest that sites within the Redditch bowl should be preferred options since they would complement the present housing areas and the impact of urban sprawl would be limited.</p>	<p>For each area analysis in the HGDS topography has been taken into account and informed the outcomes.</p>
<p>Area 7 - The arc of housing development to the south of Dagnell End Road sits oddly within the urban landscape. There is potential housing capacity in the fields south of Dagnell End Road, between the Abbey Golf Course and the A441, which would link physically and socially with the rest of Redditch. Would not expect provision of supportive infrastructure to cause problems. Similarly there are sites to the east of the area above the Arrow Flood Plain e.g. Paper Mill Hill, which may be suitable for development thus minimising the loss of the Green Belt.</p> <p>Area 7 includes important wildlife and heritage assets, but its questioned whether the whole area must be excluded and whether a modest amount of housing capacity might not be found by nibbling at its edges. There are a few fields between the Abbey golf course, A441, and Dagnell End Road (B4101), which might be made</p>	<p>Both Dagnell End Road and Paper Mill Hill were essentially covered within Area 7 on page 18 of HGDS. This area forms part of the northern section of the Arrow Valley Park and Abbey Park Golf Course which forms an important part of Redditch's open space provision.</p> <p>In addition to this there are a number of constraints not least the SSSI on Dagnell End Meadow, Local Wildlife Sites, two Scheduled Ancient Monuments and flood risk from the River Arrow.</p>

Sub Issues	Officer response
available. Similarly Paper Mill Hill is above the Arrow floodplain and potentially suitable for development.	
Area 18 and land between it and A435 - The southern part adjoins an industrial area, and would be best used for that, but the rest adjoining residential areas ought to be suitable for housing. Since it provides a north-south link from Evesham and Alcester to M42 J3, the construction of relief bypass road is a desirable object, particularly since the continuation roads further north and south have already been improved, leaving a gap in the strategic highway network. Nevertheless, it ought to be possible to provide a rather narrower highway reservation and release much of the residue for housing.	The HGDS states that the area is considered suitable, available and capable of delivering housing and employment within the plan period up to 2030. The area falls within Redditch Borough and Stratford-on-Avon District, following a review of the A435 corridor sites within it feature in the Redditch SHLAA and ELR.
Wholesale development of Area 3 would have a significant landscape impact in terms of its effect on the countryside to the west. Nevertheless, opportunities exist for developing land adjacent to the Webheath ADR, particularly at Crumpfields to round this off where it currently has a jagged end.	The HGDS comments upon the rising topography of the area and also highlights some constraints to development that mean wholesale development of the area would be inappropriate.
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.	The scale of housing required to meet Redditch's needs to 2030 cannot be met around Astwood Bank. The HGDS raises some concerns with development in areas 1, 2 and 13 which are adjacent to the settlement at Astwood Bank as it could lead to coalescence with Studley, Sambourne and Redditch and to some extent Feckenham on the western side.
<p>Northern edge of Redditch to the immediate north of Dagnell End Road, and to the west of Icknield Street within Bromsgrove District. It measures 57Ha and would deliver some 1000 dwellings net (Site details attached)</p> <p>Dagnell End Brook can be protected in terms of biodiversity and Flood risk as can be located outside Flood Zone 3. Site no more ecologically sensitive than 4 or 6 (report attached).</p> <p>Non-car forms of transport require enhancement here like areas 4 and 6. Newly re-built Church Hill centre would be accessible via</p>	<p>A number of different scenarios for development were considered including development within area 8.</p> <p>The HGDS (Paragraph 10.2) states that <i>“No area is perfect or ideal. The choice that has to be made therefore is on the basis of the area(s) which most sustainably deliver the required infrastructure with the least negative impacts.”</i></p> <p>It was considered that on balance Area 8 has insufficient capacity to meet the unmet housing needs of Redditch and even combined with Area 6 there is still a short fall.</p>

Sub Issues	Officer response
<p>improved links. A local centre within the scheme would further enhance sustainability.</p> <p>None of the green belt concerns apply to this site more strongly than areas 4 and 6.</p> <p>Para 6.4.87 notes that “some parts of the area like the south east part of the brook could be considered more suitable for development, however this alone would not provide the required housing to meet Redditch needs”. This is a reference to our client’s land, and it accepts that it could be appropriate for development. Given that the HGDS and SA themselves accept that development needs cannot be met by a single site. To discount this part of Area 8 on the grounds that it would not meet housing needs alone is perverse.</p> <p>The scrap yard referred to is included within the development area. Green belt purposes and green belt amenity would be well served by its redevelopment. Dagnell End Road need not be sacrosanct as the Green Belt boundary. Report attached shows development can be successfully integrated including creation of outer boundary.</p>	

KEY ISSUE: Cross boundary Policy – support

Sub Issues	Officer response
<p>Support policy in general as requirement for further housing development is recognised. Consider that locations in the policy need reconsidering.</p>	<p>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.</p>
<p>Policy presents a rational approach</p>	<p>Noted</p>
<p>Support 40% affordable housing target as this will place urban extensions in good stead for meeting affordable housing need. A full mix of affordable house sizes, types and tenures, responsive to local needs as indicated in the most up to date evidence (including SHMA), should be delivered. Expect more detailed policies to follow</p>	<p>Noted</p>

<p>in the Bromsgrove Local Plan.</p> <p>A split of 70% social rented and 30% shared ownership, close to the 'Mix 1' and 'Mix 2' scenarios tested in the Viability Study, is supported by bdht and should be investigated further.</p>	<p>This is noted and can be negotiated for, However the SHMA takes account of type and tenure mix over a five year period and is reviewed accordingly to meet current needs, by referencing any current requirement for type and tenure, it could render the policy out of date by the time later phases of the proposed sites come to be developed.</p>
<p>Support the promotion of developing community facilities</p>	<p>Noted</p>
<p>Note second to last bullet point of Policy picks up flood risk and refers to measures to improve local water environment, which we support. Further detail could clarify this requirement.</p>	<p>Adequate reference to flood risk is made within the policy, this would be too specific as it would only repeat policies elsewhere in the Bromsgrove District Plan.</p>
<p>Policy appears broadly acceptable - Lay out a requirement for 40% GI in major allocations. This would accord with best practice and emerging policy in South Worcestershire and would give a helpful benchmark for development master planners.</p>	<p>This would come in advance of Bromsgrove and Redditch completing GI strategies for their areas which would not be appropriate. The emerging policy for BDC will aim to deliver a high quality multi-functional green infrastructure network by;</p> <ol style="list-style-type: none"> 1) ensuring developments adopt a holistic approach to deliver the multiple benefits and vital services of Green Infrastructure, with priorities determined by local circumstances and 2) requiring development to have regard to and contribute towards the Worcestershire Green Infrastructure Framework, the emerging Worcestershire Green Infrastructure Strategy and where available, the concept plans.
<p>English Heritage welcomes emphasis on importance of integrating new development with existing built edge and surrounding rural areas. The latter will form the new settlement edge and warrants careful consideration. Suggest a strategy and management plan for GI refers to heritage assets in addition to biodiversity benefits. This reflects the multi-functional basis of GI and an integrated approach to masterplanning needs. This is consistent with Worcestershire County Council's GI Framework.</p>	<p>Noted, In undertaking GI work, the historic environment character zones and the sites heritage assets are considered and constraints for biodiversity will feed into the strategy for GI so that biodiversity gains can be achieved.</p>

KEY ISSUE: Cross boundary Policy – Objections

Sub Issues	Officer response
Disagree with the policy due to locations chosen for development	20 different sites were considered around the periphery of Redditch.

Sub Issues	Officer response
<p>Enormous increase in housing proposed and rise in population cannot be sustained in the Foxlydiat area. The policy is questionable since it's too extensive for Foxlydiat</p>	<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.</p> <p>The increase in population and resulting housing requirements are identified in the Strategic Housing Market Assessment and are Redditch's objectively assessed needs.</p>
<p>Policy contains massive requirements that are unlikely to materialise because of current/future national economic difficulties. Bound to be affected and handicapped by financial constraints.</p>	<p>The increase in population and resulting housing requirements are identified in the Strategic Housing Market Assessment and represent Redditch's objectively assessed needs. The housing requirement covers a twenty year period. It is expected that during this time, the housing market will experience both peaks and troughs in delivery rates, as has been the case during previous Plan periods. The promoters of development sites have indicated positive delivery trajectories. Therefore concerns regarding delivery of the numbers of houses on these sites are limited.</p> <p>Furthermore, annual monitoring of housing delivery would present an opportunity to assess delivery rates and changing circumstances. If the need arose, then early review of the Plan could be undertaken, as advocated in the NPPF (para 153).</p>
<p>This has been put forward by Bromsgrove District Council and is a flawed policy being enforced upon the Borough Council</p>	<p>This is not the case, the HGDS was prepared by both Bromsgrove and Redditch and the consultation was also approved by both Councils</p>
<p>What safeguards are there to ensure the laudable aims of the final policy paragraph (high-quality development, locally distinctive, contribution to local identity etc.) are implemented in the final product?</p>	<p>This is the policy which any final proposals would need to have to comply with in order to be granted planning consent.</p>
<p>Policy is confusing</p>	<p>It is not clear what aspect of the policy is confusing.</p>
<p>Development at Site 1 wouldn't create a balanced community integrated with Redditch and would not be 'sympathetic' to the surrounding rural areas of Bromsgrove.</p>	<p>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. The policy requires that the development creates a balanced community that</p>

Sub Issues	Officer response
	integrates into the existing residential areas of Redditch, and any final proposals would need to have to comply with in order to be granted planning consent.
Requirements in para 2 is lacking detail. Issues such as percentage of affordable housing, public transport provision, etc. might be better in a list of developer obligations to be sought. Include references to highway requirements, contributions to education, greenspace provision, and leisure contributions.	Specific infrastructure requirements will be included within the Bromsgrove and Redditch Infrastructure Delivery Plans. The planning policy will refer to the provision levels required on the site.
Matters such as design quality, biodiversity, etc would expect to apply to all developments across the Districts and should therefore be enshrined in the Local Plan principles	Developments on any proposed sites would need to take account of the policies within Bromsgrove's District Plan as well as this policy.
Schools not needed as there are unused school places in Redditch.	The WCC education department has indicated that the developments proposed on sites 1 and 2 would require the provision of two new first schools and contributions towards other schools.
<p>Questions rationale for 40% affordable housing. Redditch Borough requirement based on assessment of need and viability considerations is a reduced level of 30%. Infrastructure requirements of large scale urban extensions are significant and cannot allow delivery at rate higher than that expected on adjoining land. 30% more appropriate and consistent.</p> <p>Requirement for 40% affordable housing is confusing as Policy 6 Affordable Housing of Draft Borough of Redditch Local Plan No.4 only specifies 30% affordable housing provision on sites of more than 10 dwellings.</p>	This requirement relates to the evidenced viability of delivering affordable housing on greenfield land in Bromsgrove. The policy is flexible enough by including reference to 'up to' a 40% requirement.
What if a policy within Bromsgrove Local Plan contradicts, or contravenes a policy on Redditch Local Plan No.4? The impact of policies is more likely to directly affect Redditch due to proximity. No management structure or plan is in place to deal with such instances.	The policy to deliver this development has and will be jointly prepared by both Councils to ensure that it can successfully deliver the development without conflicting with other development plan policies for Redditch and Bromsgrove.
Bromsgrove and Redditch Consultation is developed to ensure new homes, jobs and services are developed with supporting transportation infrastructure, yet policy doesn't mention potential impact upon level crossings by developments (e.g. new dwellings or businesses). Level crossings can be impacted in a variety of ways by	There are no level crossings in Redditch or in close proximity to the two proposed sites.

Sub Issues	Officer response
<p>planning proposals:</p> <ul style="list-style-type: none"> • By a proposal being directly next to a level crossing • By the cumulative effect of developments added over time • By the type of level crossing involved e.g. where pedestrians only are allowed to use the level crossing, but a proposal involves allowing cyclists to use the route • By the construction of large developments (commercial and residential) where road access to and from the site includes a level crossing or the level / type of use of a level crossing increases as a result of diverted traffic or of a new highway • By developments that might impede pedestrians ability to hear approaching trains at a level crossing, e.g. new airports or new runways / highways / roads • By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs • By any developments for schools, colleges or nurseries where minors in numbers may be using the level crossing • By any development that alters a primarily agricultural use level crossing to residential usage (e.g. from use by a farmer to proposed use by a residential development). 	
<p>As consultation on Housing Growth supports railway improvements, there should be support to removal of level crossings (Moors Gorse is effectively closed already once the footbridge is constructed).</p>	<p>Moors Gorse is not within or close to the two Districts so this comment also does not apply.</p>
<p>We request that the policy confirms that: Bromsgrove Council have a statutory responsibility under planning legislation (Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) Order, 2010) to consult the statutory rail undertaker where a proposal is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway;</p> <p>As a first principle, Network Rail would seek to close Level Crossings where possible;</p>	<p>The statutory responsibility is noted, as it is covered in legislation it is considered unnecessary to include this within the policy itself.</p> <p>There are no level crossings near to the two proposed sites so reference is not necessary</p>

Sub Issues	Officer response
<p>Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing impact and mitigation measures including assessment of closure; and</p> <p>The developer is required to fund any qualitative improvements required to the level crossing identified as a direct result of the development proposed.</p>	<p>There are no level crossings near to the two proposed sites so reference is not necessary</p> <p>There are no level crossings near to the two proposed sites so reference is not necessary</p>
<p>To ensure developer contributions deliver improvements to the rail network, recommend that the Consultation include provisions for rail. Policy should include the following:</p> <p>A requirement for developer contributions to deliver improvements to the rail network, including any development that occurs as a consequence of the Bromsgrove and Redditch Consultation on Housing Growth. A requirement for Transport Assessments to take cognisance of impacts to existing rail infrastructure to allow any necessary developer contributions towards rail to be calculated. A commitment to consult Network Rail where development may impact on the rail network and may require rail infrastructure improvements. To be reasonable these improvements would be restricted to a local level and would be necessary to make the development acceptable. We would not seek contributions towards major enhancement projects which are already programmed as part of Network Rail's remit.</p>	<p>This response has been sent to WCC for comment - what happens to rail in TAs?</p>
<p>Expect permeable paving, swales and filter drains necessary in all large developments to avoid discharge into foul sewer network which could increase the volume and frequency of flooding and adverse effects on natural/social environment.</p>	<p>Adequate reference to SUDS is made within the policy, this would be too specific as it would only repeat policies elsewhere in the Bromsgrove District Plan.</p>
<p>The requirement for Green Infrastructure and SUDs and on Site 2 "to avoid development on high slopes" (Paragraph 10.4 page 224 of Housing Growth Development Study) means these sites may not achieve the number of dwellings envisaged. Refer to 'Viability Testing Local Plans Advice for Housing Delivery Practitioners –</p>	<p>The on site requirements have been considered in determining the capacity for housing and employment across site 2 and the adjoining Brockhill Strategic Site.</p>

Sub Issues	Officer response
<p>Local Housing Delivery Group' chaired by Sir John Harman (June 2012). The Harman Report states "One error that has a very large impact on the outcome of viability testing is overlooking the distinction between the gross site area and the net developable area. The net area can account for less than half of the site to be acquired (that is, the size of the site with planning permission) once you take into account on-site requirements such as formal and informal open space, sustainable urban drainage systems, community facilities and strategic on site infrastructure etc. On larger sites, sometimes the net area can be as little as 30%".</p>	
<p>Policy not sound within the meaning of the NPPF. Not disputing the Policy has been positively prepared insofar as the Councils are working jointly to meet development needs of Redditch, do not consider it is justified, effective or consistent with national policy.</p>	<p>There are no specific reasons provided by the respondent as to why the policy is not justified, effective or consistent with national policy</p>
<p>Broaden flexibility of Policy by including one or more reserve cross-boundary sites. Policy and criteria would apply to them. Policy would set out circumstances when reserve sites can be brought forward, as a result of lack of delivery of allocated sites. This process could occur without a review of the Local Plan</p>	<p>The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>

KEY ISSUE: Cross boundary Policy – suggested changes

Sub Issues	Officer response
<p>Could have tried to slowly develop smaller areas before looking at devastating a massive greenbelt area.</p>	<p>20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the</p>

Sub Issues	Officer response
	most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt.
<p>Sustainable transport: the developers to 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>Sustainable transport: developers to fund or support the provision of additional bus services to the development for a period of 10 years following the completion of sale of the first property at the development</p> <p>Water management: developers to 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.</p> <p>Vehicular access: 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>Countryside access: 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>The Councils are currently preparing Infrastructure Delivery Plans (IDPs) which will identify all types of infrastructure needed to support development. The IDPs will, in turn, inform the level of developer contributions sought for infrastructure (and, where applicable, for future maintenance). It should be noted that some infrastructure is provided directly by the developer, some via developer contributions and some is provided directly by the infrastructure provider.</p>
<p>Water treatment: given the requirement to pump sewage water 7.5 kms to Spernal Ash, all properties to be built with roof top solar panels installed in order to offset the energy requirements of the sewage pumping operation</p>	<p>Adequate reference to renewables and technologies is made within policies elsewhere in the Bromsgrove District Plan and to repeat these would be too onerous.</p>
<p>Seek to provide ‘church space’ within the new shared community</p>	<p>Unless a provider or scheme is likely to or requests to be incorporated</p>

Sub Issues	Officer response
facilities	within the development it is not feasible to set aside land or property for this purpose.
Suggest considerable work needed to investigate suitability of all sites considered to establish their deliverability and viability. If developers have options on various sites its not unreasonable to expect initial surveys on ecology, utility provision, public transport provision, etc. These would have to be considered by developers in preparing Environmental Impact Assessments at a later stage.	There will be work on viability and further evidence to support Sites in advance of the pre-submission versions being published
Might be useful for Members to consider the relative merits of allocating one or two large developments or allocating smaller housing numbers to a greater number of sites.	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.
Includes a reference to the need for development to ensure sufficient capacity of sewerage systems for wastewater collection and treatment is provided. The housing study (paragraph 9.3, page 221) site appraisals acknowledge constraints to the existing foul infrastructure network as a key component in delivery timescales and phasing. However, this is not reflected in the policy, there is no reference to phasing of development informed by infrastructure requirements.	STWL are providing the Councils with more information on likely costs and timescales for a range of scenarios and this will inform the development of the policy ACTION: Review contents of STWL additional information for policy additions.

Sub Issues	Officer response
<p>Principles and recommendations of the Level 2 SFRA should be reflected in policy recommendations and requirements for each preferred site, with a commitment to confirming developable areas</p> <p>Would expect hydraulic modelling of watercourses to be undertaken in clarifying the Flood Zone extents</p> <p>Ensure any development does not increase flood risk elsewhere by increasing surface water run-off rates/volumes from the site post development (or during construction). A surface water drainage strategy should be produced for each development site</p> <p>Opportunities for flood risk betterment should be considered.</p> <p>Make it clear that all built development should be located outside the floodplain and a suitable buffer strip provided adjacent to watercourses.</p>	<p>Site specific flood risk assessments are being completed for these sites as the Level 2 SFRA did not consider these sites because they were analysed following the completion of the SFRA. Any relevant policy concerns from the site specific FRAs will be included</p> <p>ACTION: Review contents of SFRA for policy additions.</p>
<p>Improvements to the water environment should include biodiversity and water quality requirements, linked to the WFD objectives and green infrastructure section of the policy.</p>	<p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure and this would include potential for enhancements to blue infrastructure.</p>
<p>Reference SuDS as a requirement of the policy, which should be designed with an appropriate level of treatment to protect the water environment</p>	<p>This is already a requirement within the policy</p>
<p>Advise that North Worcestershire Water Management Team are consulted on the draft policy wording, in considering opportunities to improve any local known flooding issues, through development in these areas.</p>	<p>North Worcestershire Water Management Team has been added to the LDF database.</p>
<p>A historic landfill site (Hawthorne Pit, Cur Lane, Bartles Wood, Foxlydiate) is within this area, which accepted waste from 1980–1982. Development in this part would need appropriate site investigation and remediation prior to development. An appropriate contaminated land desk study/risk assessment would need to be submitted, as a minimum.</p>	<p>Presume respondent is referring to Site 1.</p> <p>ACTION: Include reference to site investigation for contaminated land for both sites</p>
<p>Although the draft policy refers to improving the local water</p>	<p>Agreed, the groundwater protection principles will be incorporated into</p>

Sub Issues	Officer response
<p>environment, include a specific reference to groundwater quality and contaminated land. This is particularly important for Site 1. Recommend as an additional bullet point. Include requirement to consider sensitivity and potential risk to the water environment (including groundwater vulnerability), and to carefully design development (i.e. layout and any associated infrastructure), with appropriate mitigation to protect and enhance the water environment. Contaminated land assessments should be submitted to sufficiently characterise the risk, including site investigation where necessary. Proposals must undertake appropriate remediation measures and verification works where contamination issues are present.</p>	<p>the Policy as appropriate.</p> <p>ACTION: incorporate principles into the Policy as appropriate</p>
<p>Careful consideration will need to be given to infiltration SuDS, particularly in groundwater sensitive areas. Where infiltration SuDS are proposed for surface run-off from roads, car parking and public or amenity areas, they should have suitable treatment steps to prevent pollution of ground and surface waters. SuDS can help address existing issues relating to low flows in surface waters and aquifer recharge i.e. by ensuring that natural infiltration rates occur across the development during normal, as well as high rainfall, to maintain base flows.</p>	<p>Adequate reference to SUDS is made within the policy, this would be too specific as it would only repeat policies elsewhere in the Bromsgrove District Plan.</p>
<p>Reference to the table para 3.38, would like to see the third reference amended (upper case amendments) to "Prominent physical features i.e. Fragmented tree coverage dense woodland, ANCIENT WOODLAND, ANCIENT trees, good and sparse hedgerow growth quality hedgerow growth. This would link with comments in para 3.16 and reference to ancient woodland in para 3.17.</p> <p>Ancient woodland and ancient/veteran trees are an irreplaceable semi natural habitat that does not benefit from full statutory protection: for instance 84% of ancient woodland in the West Midlands has no statutory protection. With only 2.4% of the land area in Great Britain and, for instance, a below average 1.83% of Redditch Borough, covered by ancient woodland, we cannot afford any more of this finite resource to be lost forever in the locality.</p>	<p>The HGDS was completed for consultation purposes and will not be amended following consultation.</p> <p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure and this would include evaluating where ancient woodland assets exist and could be protected or enhanced. Emerging BDC policy on the Natural Environment seeks to achieve better management of Bromsgrove's natural environment by expecting developments to protect, restore, enhance and create core areas of high nature</p>

Sub Issues	Officer response
<p>Government policy is increasingly supportive of absolute protection of ancient woodland and ancient trees. The NPPF states “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland” (DCLG, March 2012, para 118). However this NPPF wording should be considered in conjunction with other stronger national policies on ancient woodland. The Government’s policy document ‘Keepers of Time – A statement of Policy for England’s Ancient & Native Woodland’ (Defra/Forestry Commission, 2005, p.10) states: ‘The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland’. The Government’s Independent Panel on Forestry states: ‘Government should reconfirm the policy approach set out in the Open Habitats Policy and Ancient Woodland Policy (Keepers of Time – A statement of policy for England’s ancient and native woodland).....Reflect the value of ancient woodlands, trees of special interest, for example veteran trees, and other priority habitats in Local Plans, and refuse planning permission for developments that would have an adverse impact on them.’ (Defra, Final Report, July 2012). This has been endorsed by the response in the recent Government Forestry Policy Statement (Defra Jan 2013): ‘We recognise the value of our native and ancient woodland and the importance of restoring open habitats as well as the need to restore plantations on ancient woodland sites. We, therefore, confirm our commitment to the policies set out in both the Open Habitats Policy and Keepers of Time, our statement of policy for England’s ancient and native woodland’. The Government’s Natural Environment White Paper – The Natural Choice: securing the value of nature (HM Government, July 2011, para 2.56) states that: ‘The Government is committed to providing appropriate protection to ancient woodlands....’. The new Biodiversity Strategy for England (Biodiversity 2020: A Strategy for England’s Wildlife & Ecosystem Services, Defra 2011, see ‘Forestry’</p>	<p>conservation value (including nationally and locally protected sites and irreplaceable nature resources such as sites with geological interest, ancient woodlands and habitats of principle importance), wildlife corridors, stepping stones and buffer zones.</p>

Sub Issues	Officer response
<p>para 2.16) states that – ‘We are committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland site’. The West Midlands Forestry Framework (Growing our future, May 2010, Forestry Commission) Objective EB2 seeks: ‘To prevent any further loss of ancient woodland and to enhance ancient semi-natural woodland and trees with new native woodland planting...’</p>	
<p>Plan should err on the side of caution by designating a limited amount of land for early development. The target is intended be something like a 20-year land supply. About half of this is provided by urban land supply. Suggest that a considerable part of the area should become Safeguarded Land. The Plan should provide for regular phased release of such land.</p>	<p>Because Redditch would not have a five year supply of land from adoption when using only Redditch Borough sites, some of the parts of sites 1 and 2 would need to delivery houses early on. Indications from both developers are that this is feasible.</p> <p>The preferred option of sites 1 and 2 will provide land for Redditch’s housing needs to 2030. It is not considered necessary to propose more development.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960’s and 1970’s New Town areas may also provide further regeneration scope within the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>

KEY ISSUE: Biodiversity

Sub Issues	Officer response
<p>Development anywhere will result in the destruction of trees</p>	<p>A Habitats and Species Survey is being completed which includes tree and hedgerow analysis, this would need to be submitted as part of any planning application. The protection of trees will be dealt with through the application process and any removal of trees to enable</p>

Sub Issues	Officer response
	development will be kept to a minimum.
More work required regarding species and habitats of principle importance prior to development and findings may reduce any developable areas	A Habitats and Species Survey is being completed, this would need to be submitted as part of any planning application. This will inform the master planning of the site in order to maximise opportunities for biodiversity and recreation and mitigate the effects of development on biodiversity such as planting to encourage natural foraging, artificial bat roosts etc.
Protection and enhancement of existing features of interest and creation of new and improved links between them will be critical in delivering on-site GI networks, essential if development of any proposed areas is sustainable. Networks of watercourses, trees, hedges and ponds etc. of particular importance and must benefit from careful consideration in final area allocations. With this in mind we are pleased to support bullet points 4 and 5 of the Housing Growth Policy in Appendix 1.	The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure.
Generally satisfied that landscape and ecological sensitivities of the preferred sites have been identified and that effects on these from proposed development could be adequately mitigated if provided in accordance with relevant Plan policies.	Noted.

KEY ISSUE: Green Belt

Sub Issues	Officer response
If Areas 4,5,6 and 11 were selected this would mean the whole of North Redditch would be a building site for a good number of years and result in the development and destruction of 4 Green Belt areas.	This is not proposed as the preferred approach to meeting housing need.
The SHMA requirement with other evidence has shown that the full 6,400 dwellings required can be met, with the RBC Preferred Options of Areas 4 and 6, so there is no requirement to develop any further Greenbelt sites for the duration of this Plan. I would request that ALL Areas not chosen for development in the Plan and not classed as strategic sites in Local Plan 4, stay as Greenbelt and are not de-regulated in any shape or form i.e. no ADR's etc. Safeguard these Greenbelt Areas for the future of both Redditch and Bromsgrove	The developable areas of Areas 4 and 6 have been identified through the Housing Growth Development Study and are proposed to meet the cross-boundary housing need. All other areas will remain designated as Green Belt and no ADR's are currently proposed to be designated.

Sub Issues	Officer response
residents.	
<p>Bromsgrove as a good neighbour ought to help Redditch to overcome some of its needs for Housing, but it should not be at the cost of Bromsgrove's own cherished interests. Under no circumstances should Bromsgrove green belt be touched. Bromsgrove's environmental interests should be the overriding aims and objectives. Therefore, the entire shortfall of 3400 houses should not be considered and met by Bromsgrove.</p>	<p>The cross-boundary growth is for Redditch's needs and for sustainability reasons the development should be close to the boundary of Redditch. All of the areas in Bromsgrove adjacent to the boundary of Redditch are designated as Green Belt, so some Green Belt loss is inevitable in order to accommodate the need. The choice of development locations is based on a wide range of considerations, not just environmental interests. The Duty to Cooperate requires Redditch Borough and Bromsgrove District Councils to work together to find a solution to meet the housing need.</p>
<p>With the development of the Oakalls starting at the A448 and with proposed development of Area 4 this would leave insufficient green belt to define the boundaries of Bromsgrove and Redditch and would start urban sprawl.</p>	<p>There would still be a significant Green Belt gap between Redditch and Bromsgrove. The proposed boundary for Site 1 (which falls within Area 4) has been carefully chosen to limit urban sprawl.</p>
<p>Smaller settlements dotted around the county would impact far less on our green belt.</p>	<p>The cross-boundary growth is for Redditch's needs and for sustainability reasons the development should be close to the boundary of Redditch. All of the areas in Bromsgrove adjacent to the boundary of Redditch are designated as Green Belt, so some Green Belt loss is inevitable in order to accommodate the need. The two Authorities cannot make provisions in other plans to meet Redditch's growth.</p>
<p>If Green Belt is no longer sacrosanct, how can any boundary (road, railway line, water course or hedge) remain as a barrier to further encroachment in the future?</p>	<p>Green Belt policy has not changed. If there are exceptional circumstances to justify rolling back Green Belt the NPPF suggests that this should be done in order to meet objectively assessed housing requirements.</p> <p>The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development.</p> <p>Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within</p>

Sub Issues	Officer response
	<p>the next plan period.</p> <p>During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.</p>
Green belt land is the only barrier to prevent urban sprawl.	Noted this is considered in the HGDS
Too much focus on how to use Green Belt land and not enough on redevelopment.	Redevelopment and development within Redditch has been considered through the SHLAA. Where redevelopment opportunities exist within the focussed area sites this has been identified.
Potential release of Green Belt land in the 20 areas around Redditch has not been adequately assessed in the same way that the land within Redditch has.	There is a difference in the small scale Green Belt releases within Redditch and the purpose of the HGDS to search for the best site or sites to accommodate a significant amount of Redditch's housing requirements. It is appropriate in these circumstances to have different methodology but they are not inconsistent in the outcomes.
Two years ago, the Draft Core Strategy for Redditch identified the areas under review as Green Belt and the status of the identified sites has not changed; as such, if carried forward, the proposals would represent inappropriate development in Green Belt under current policy.	Green Belt policy has not changed. If there are exceptional circumstances to justify rolling back Green Belt the NPPF suggests that this should be done in order to meet objectively assessed housing requirements.
WPD object to the Council's definition of power lines as "weak boundaries" which are considered by the Council "to be those that are visible but can be easily altered or destroyed" (as set out by Paragraph 3.39). WPD emphasises that strategic overhead power lines are not necessarily 'weak boundaries', which cannot be easily moved or removed. To move or remove strategic power lines may place a financial burden on WPD.	The HGDS does not propose to remove power lines, the reference to weak boundaries is a description of their physical attributes and how well they feature on the ground. Power lines are sometimes diverted underground as a result of development.
Premise of the HGDS is that growth is met around Redditch rather than dispersed which has less Green Belt impact	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.
Weak boundaries that need enhancing is at odd with Green Belt policy in the NPPF	Agreed, existing defensible boundaries are always more preferable for defining long term green belt boundaries on a site to provide more certainty going forward. The HGDS looked extensively at proposing

Sub Issues	Officer response
	scenarios within these strong boundaries so it achieves this with selecting sites 1 and 2. However where it is not possible to propose green belt boundaries on existing strong boundaries, it is acceptable to enhance weaker boundaries through development and its layout/planting.
Supports the principle of having a Green Belt, and of its having defensible boundaries. Nevertheless, the approach to what boundaries constitute defensible boundaries is unsatisfactory. The edge of a wood is clearly a defensible boundary, as is a road. At the other extreme a post and wire fence is clearly an indefensible one. The problem area lies between these. It seems that a low hedge, resulting from regular trimming is treated as a weak boundary, whereas an ill-maintained hedge, where the hedge has been allowed to grow into a row of trees is regarded as a stronger one. There is a fallacy in this: leaving a hedge to grow in an uncontrolled manner for a few years will turn it into a row or trees. The natural growth of trees in that period could easily turn what is now regarded as a weak boundary into a strong one. Conversely, applying a traditional maintenance regime to an overgrown hedge will, in a few years turn it into a much smaller hedge.	The HGDS (paras 3.29 to 3.41) set out the methodology for evaluating the strength of boundaries and identifies what constitutes and strong or weak boundary.
A ridge of hills is an even more defensible boundary, though at one point the HG document dismisses a ridge as a defensible boundary due to the difficulty of identifying exactly where the boundary should be. In the case of a round-topped hill, there is an element of truth in this. However, a ridge is actually the most robust boundary of all. It will no doubt be desirable to restrict the developable area, so that the roofs of houses will not project above the skyline, but that is an issue of the extent of the developable land, not directly one of precisely where the Green Belt boundary should be placed.	The HGDS (paras 3.29 to 3.41) set out the methodology for evaluating the strength of boundaries and identifies what constitutes and strong or weak boundary.

KEY ISSUE: Housing

Sub Issues	Officer response
Build within the Redditch boundary to satisfy <u>current</u> needs and re-	NPPF requires that the objectively assessed needs are met and are

Sub Issues	Officer response
assess future requirements (if they exist) then	allocated in a plan for fifteen years
<p>migration statistics also fluctuate wildly – it is therefore reasonable to presume that housing number requirements will also vary in coming years</p> <p>The suggestion that 3,400 houses are needed by Redditch (as contained in the publicity for the proposed development) is wrong. It is a forecast based on dubious and largely outdated assumptions of demographic and economic growth in the town. Similar projections have been made in earlier years and have fluctuated widely. None of them has come near the miniscule actual growth contained in the consultant's own report.</p>	<p>The housing requirement for Redditch is set out in the SHMA 2012. The data is informed by the ONS projections which are widely used as standard methodology nationally.</p>
This is a Regional policy, build in other more sustainable locations	<p>This is a plan prepared by the two Local Authorities and is not regional policy. 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.</p>
if we do need them in Redditch how can we then say they need to be built in Bromsgrove	<p>The requirements for Redditch are in excess of the capacity of the Borough. The cross boundary growth is for Redditch's needs and therefore for sustainability reasons the development should be close to the boundary of Redditch. Based on the target of 6,400 dwellings Redditch does not have a five year housing land supply using land within its own boundaries only. This is because a number of the sites that can form part of portfolio of sites cannot come forward within five years due to other factors such as land ownership issues.</p>
If there is no room how can they be needed?	<p>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 limited.</p>
I don't believe this number hasn't been challenged fully	<p>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</p>

Sub Issues	Officer response
	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.
The country needs affordable housing, not luxury homes on green fields.	This is considered in the SHMA which details what affordable housing and market housing is required as well as the size and tenure of housing.
<p>Bromsgrove Council is happy to "dump" its allocation right "in the face" of Redditch residents, well out of sight of its Bromsgrove residents</p> <p>Bromsgrove would of course pass this burden quite readily onto their furthest borders because it will fail to affect them, being so far removed from the proposed development.</p> <p>It is unfair of Redditch Council to agree to take on Bromsgrove's housing allocation at Foxlydiate</p>	This HGDS considers the best sites to meet the objectively assessed needs of Redditch, it does not contribute towards offsetting Bromsgrove housing requirements.
Bromsgrove has its own increasing housing needs. This ought to be the guiding principle.	Noted, however finding sites to meet Bromsgrove's housing requirements is not the purpose of the HGDS
I have no faith that the numbers will stack up when this all plays out in the future and given the migration of people out of the area to find much needed jobs (where will they find them in Redditch?) verses the rising immigrant population (are these the Redditch families that you are building for ?)	The SHMA recommends a housing requirement based upon a range of factors including migration effects to and from Redditch
<p>If this proposal is agreed will BDC still be required to meet it's quota of some 4000 and possibly 7000 homes making a total of at least 7,400 new homes within the boundaries of the BDC?</p> <p>If this is the case then BDC should consider building 6/10 story flats in order to preserve irreplaceable farm land and include all brown field sites. For example the brown field site at the junction of Charfort Road, A38 and Stoke Road would be the ideal location for some 10 story flats as it is within walking distance of Bromsgrove Railway Station, two Supermarkets, two schools, a playing field & bowling ally and opposite to the KFC now being built. While it may currently be</p>	<p>This consultation relates solely to meeting Redditch growth needs. Bromsgrove would still need to meet its requirements separately. It can meet requirements of 4500 new dwellings up to 2023 without any Green Belt release. It is anticipated a Green Belt Review will reveal how and where the remaining needs will be met up to 2030 and beyond.</p> <p>Density issues are an important design consideration when considering proposals for new development. BDC currently adopts the policy stance that new development should in keeping with the character of the area. New housing should be well related in scale and</p>

Sub Issues	Officer response
<p>designated as part of the industrial estate I am sure that building some 400 homes on this site would take priority as many industrial building are currently vacant, nor would this site be controversial. When last I suggested that we should be building up and not out to save valuable farming land, I was told by BDC that no one wants to live in flats. If flats are of the standard of those built at the junction Fox Lane and Rock Hill Road that have no place to hang washing and no balcony, I am not surprised, however although they are poorly designed they were all occupied soon after the site was released.</p>	<p>location to existing development and well integrated with the existing pattern of settlement. The NPPF states that “Planning policies and decisions should aim to ensure that developments respond to local character and history, and reflect the identity of local surroundings and materials..... “ It is a misconception that building high rise blocks of flats results in less land take than more ‘traditional’ development layouts.</p> <p>It is understood that the flats on the junction of Fox Lane and Rock Hill are 3 storey buildings.</p>
<p>The Dodford with Grafton Parish Council express their concern that if the suggested housing growth goes ahead what are the implications for Bromsgrove to meet its own commitment in the context of Birmingham's request.</p> <p>The Worcestershire SHMA did not consider these wider Growth issues. It is important that this observation should not be taken as a criticism of that study but rather as a matter of fact which needs to be dealt with in an appropriate fashion.</p>	<p>The HGDS only considers the issue of Redditch growth being required within Bromsgrove District.</p> <p>There is no plan to undertake an immediate Green Belt review within Bromsgrove as there is sufficient supply of sites in the short term. A review will be undertaken within Bromsgrove as part of the next plan to release land to meet Bromsgrove’s longer term requirements.</p> <p>The Worcestershire SHMA was completed in advance of understanding the scale of the issue of Birmingham growth needs which cannot be accommodated within the city. Until this information on need and supply is available there is no evidence on which to base decisions about further plan related work in Bromsgrove or Redditch.</p>
<p>Why is RBC just accepting this target and not looking for yourselves to see what best suits the residents of Redditch? If the need is so great, where are all these people living now?</p>	<p>The housing requirement 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. 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.</p>
<p>Query how this decision fits in with the Regional Housing Strategy.</p>	<p>The West Midlands Regional Housing Strategy (2005) aimed to assist delivery of the WMRSS which no longer exists.</p>
<p>It is cheaper to build all houses in one discreet area. This ignores the</p>	<p>There is no evidence to suggest that building in one area around</p>

Sub Issues	Officer response
environmental impact of such a development	Redditch is likely to be cheaper. The environmental impacts of areas have been assessed through the SA.
Acknowledge that the HGDS does not seek to accommodate development in Malvern	Noted
<p>Lack of housing capacity in Redditch is a Redditch issue alone. It has been presented as something affecting both Councils to the same degree</p> <p>RBC should make its case independently of BDC then BDC replying with its position</p> <p>The duty to cooperate is a reciprocal process not a mechanism for enabling unmet needs in one area to be met in another</p>	This is incorrect, there is a duty to cooperate and for that cooperation to be meaningful. The decision needs to be endorsed by both Councils for inclusion in both plans for submission
South Worcs authorities keen that all of the housing needs are met either within your administrative boundary or as suggested partly within neighbouring Bromsgrove through joint working.	Noted
Wyre Forest DC supportive of the suggested sites for accommodating growth arising from Redditch Borough within Bromsgrove District.	Noted
The two authorities approach to strategic planning is admirable. It demonstrates that both Authorities have engaged with the duty to cooperate unlike others	Noted
<p>Do not believe cooperation between Authorities is enough to discharge duty to cooperate. Following RSS revocation DTC is more important than ever. Birmingham growth is an established strategic matter and cannot be postponed.</p> <p>In relation to Bromsgrove Local Plan the City Council's principle interest will be in Examining how land within Bromsgrove might contribute to meet the housing shortfall emerging in Birmingham to meet needs up to 2031 and beyond.</p>	The authorities will be completing more work to prepare for submission versions of their Plans to ensure the duty to cooperate is complied with. The matter of Birmingham growth is being considered by the Councils so this duty is also being complied with.
Bromsgrove and Redditch appear to have a less than 5 year housing land supply.	Based on the target of 6,400 dwellings Redditch does not have a five year housing land supply using land within its own boundaries only. This is because a number of the sites that can form part of portfolio of

Sub Issues	Officer response
RBC only has a 3.4 year housing land supply. This does not comply with the requirements of Para 47 of the NPPF. Without a five year housing land supply, Para 49 of the NPPF will apply, which states “relevant policies for the supply of housing should not be considered up to date if the Local Planning Authority cannot demonstrate a five year supply of deliverable housing sites”.	sites cannot come forward within five years due to other factors such as land ownership issues. When taking the cross-boundary land in Bromsgrove into consideration (being proposed through this consultation), some development in these areas could contribute to and improve Redditch’s five-year housing land supply. Bromsgrove have a 5.87 year supply as of 2013.
There is no indication that additional housing land has been discussed with Stratford Council or other adjoining authorities and we doubt that the duty to cooperate has been complied with properly	Duty to cooperate has been successful with neighbouring Stratford District. The authorities will be completing more work to prepare for submission versions of their Plans to ensure the duty to cooperate is complied with.
While the identification of Areas 4 and 6 appear to have merit more land should be identified in those areas to address the above matters.	The preferred option of sites 1 and 2 will provide land for Redditch’s housing needs to 2030. It is not considered necessary to propose more development. Redditch Borough Council has proposals for the future regeneration of Redditch Town Centre, which would enable some longer term land availability to occur. The likely deterioration of the 1960's and 1970's New Town areas may also provide further regeneration scope within the next plan period. During each plan review evidence is collected to consider which areas of land could be used to meet housing needs. This process will occur when preparing the next plan. It is impossible to determine exactly how this process will occur at the moment.
Anticipate that if Bromsgrove Plan cannot deal with Birmingham growth matter, an approach like Solihull Council took demonstrating that the matter will be dealt with when appropriate, will be adopted	Noted
Housing need alone does not constitute very special circumstances for development within the Greenbelt	Green Belt policy has not changed. If there are exceptional circumstances to justify rolling back Green Belt the NPPF suggests that this should be done in order to meet objectively assessed housing requirements.
Like the draft Local Plan, the HGDS fails to comply with paras 14,	The HGDS methodology made it clear how each of the sites have

Sub Issues	Officer response
30, 85 and 182 of NPPF. It is essential that Local Plans and policies are 'Justified' in order for them to be found sound. They must demonstrate the most appropriate strategy when considered against the reasonable alternatives.	been considered, and those worthy of further consideration have been analysed in more detail. The SA considers each site as well as looking at combinations of sites. There can be no question of this approach not being thorough in looking at all potential alternatives.
Houses for Redditch people - not dormitory town, commuters benefit from our lower house prices, here in Redditch.	The SHMA recommends a housing requirement based upon a range of factors including migration effects to and from Redditch
In a meeting almost 12 months ago, Head of Planning, Ruth Bamford asserted that RBC can demonstrate a 5 year supply of deliverable sites (+ 5%). RBC planners were negligent and inept in that they were wrong in their calculations. RBC planners now say that they do not have a 5 year supply of deliverable sites (+ 5%). This has changed with little or no consultation.	At this time the five year land supply was based upon a rolling forward of the WMRSS target, so the methodology has changed with the production of the SHMA in 2012 and the Redditch housing requirements being expressed as part of the HGDS consultation and Local Plan No.4 consultation.
Consultation document and Redditch SHLAA do not make it clear that that sufficient consideration has been given by Redditch to their potential urban greenfield capacity.	The original SHLAA from 2008/9 identified and assessed 594 sites within the Borough of which some were greenfield. Those considered suitable to deliver residential development were included. The Redditch SHLAA was examined by Bromsgrove officers. It would not be appropriate for the HGDS to repeat information in background evidence.
Redditch does not appear to have carried out an adequate review of its industrial land portfolio. There is anecdotal evidence of a large number of industrial units in Redditch that have been continuously empty for many years.	This is undertaken annually in the Redditch ELR. Redditch does not have a large number of vacant industrial units and in fact has low vacancy rates which are required to enable churn in the market.
Inclusion of two identified sites within Bromsgrove's administrative area does not resolve the problem of the undersupply of deliverable housing land in Redditch. Be more ambitious and allocate more than a minimum amount of land for residential development in order to significantly boost the supply of housing as necessary to comply with Paragraph 47 of the NPPF. Bromsgrove and Redditch Council's should consider complementing two sites with additional sites, which may deliver earlier in the plan period and add flexibility.	The preferred option of sites 1 and 2 will provide land for Redditch's housing needs to 2030. It is not considered necessary to propose more development.

Sub Issues	Officer response
<p>Consider that a total of 1923 dwellings are reasonably Regarded as deliverable from within Redditch. This leaves a shortfall of 4457 dwellings needing to be delivered from urban extension to the north of the Borough within Bromsgrove.</p> <p>Foxlydiate and Brockhill East anticipated to provide 2800 and 600 dwellings respectively. Even in their current form, there would still be a shortfall of 1057 dwellings requiring further allocation</p>	<p>The SHLAA sites within Redditch are considered to be deliverable by the end of the plan period therefore they can all be released to meet the provision of 3,000 dwellings within Redditch. This would therefore leave the cross boundary contribution unchanged.</p>

KEY ISSUE: Sustainability

Sub Issues	Officer response
<p>There have been no solar panels on recent developments so these cannot be described as sustainable.</p> <p>Mitigate the long-term high carbon nature of building new developments</p>	<p>Solar panels are not the only renewable technology which makes a development sustainable. Developments will be constructed to the nationally required standard (Code for Sustainable Homes)</p>
<p>Community food growing spaces should be included into new and existing developments.</p>	<p>Noted. Incorporating community food growing spaces into any potential development area could be considered further through a Green Infrastructure Strategy and Management Plan for the sites.</p>
<p>The visual impact of new developments should be lessened through the use of Green Roofs</p>	<p>Green roofs are not the only way to lessen visual impact of new development. However, the use of green roofs is not precluded from consideration and can be employed if and when appropriate.</p>
<p>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</p>	<p>Adequate reference to renewables and technologies is made within policies elsewhere in the Bromsgrove District Plan and to repeat these would be too onerous.</p>
<p>May be opportunities to positively connect our landscape with new development plans. Woodlands could become used by social forestry projects to provide materials for hedgerow maintenance, timber-frame buildings.</p>	<p>Agreed. However it is not the remit of planning policy to implement initiatives such as these.</p>

KEY ISSUE: Infrastructure – Rail

Sub Issues	Officer response
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Sub Issues	Officer response
<p>We would request that any planning applications from developers that arise as a result of the Bromsgrove and Redditch Consultation on Housing Growth should contact Network Rail for any proposals within the area to ensure that:</p> <p>(a) Access points are not impacted</p> <p>(b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g.</p> <ul style="list-style-type: none"> • Drainage works / water features • Encroachment of land or air-space • Excavation and earthworks • Wind turbines • Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues • Lighting impacting upon train drivers ability to perceive signals • Landscaping that could impact upon overhead lines or Network Rail boundary treatments • Any piling works • Any scaffolding works • Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949) • Any use of crane or plant • Any fencing works / acoustic fencing works and boundary treatments • Any demolition works • Any hard standing areas • Works adjoining / adjacent or near to railway stations <p>We would very strongly recommend that developers are made aware that any proposal within 10m of the operational railway boundary will also require review and approval by the Network Rail Asset</p>	<p>Officers have previously made developers and Network Rail aware of the development proposals.</p>

Sub Issues	Officer response
<p>Protection Team, and such schemes should be accompanied by a risk assessment and a method statement. No works should commence on site without the approval of the Network Rail Asset Protection Engineer. Network Rail is required to recover any expenses incurred in facilitating third party proposals, a BAPA may be required for works on site.</p>	
<p>Where growth areas or significant housing allocations are identified close to existing rail infrastructure it is essential that the potential impacts of this are 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. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions or CIL contributions to fund such railway improvements; it would also be appropriate to require contributions towards 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.</p> <p>The likely impact and level of improvements required will be specific to each station and each development meaning standard charges and formulae may not be appropriate. Therefore in order to fully assess the potential impacts, and the level of developer contribution required, it is essential that where a Transport Assessment is submitted in support of a planning application that this quantifies in detail the likely impacts on the rail network.</p>	<p>Network Rail will be engaged during the preparation of the Infrastructure Delivery Plans for Bromsgrove and Redditch. The Councils have not yet determined whether or not a CIL charging schedule will be pursued, however developer contributions may be appropriate through S106.</p>

KEY ISSUE: Infrastructure – Police

Sub Issues	Officer response
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The development and associated population growth proposed by sites identified in the Local Plan, alongside growth in Bromsgrove carries significant infrastructure implications for the police service	Noted. The Police Service will be engaged during the preparation of the Infrastructure Delivery Plans for Bromsgrove and Redditch.
To fulfil its statutory obligations WMP require provision of a new dedicated police station in Redditch in the long term. HWFRS however are of the view that a new capital facility is not required in the Borough.	Noted. This can be identified in the Infrastructure Delivery Plan for Redditch.
We accept that the Council will require robust and credible evidence to support the case for contributions from the strategic sites, urban extension and other development across the Borough towards the new facility. Consequently, consultants WYG will prepare a Strategic Infrastructure Assessment (SIA) during the August/September 2013 public consultation on the Local Plan.	Noted. The strategic infrastructure assessment will inform the Infrastructure Delivery Plan.

KEY ISSUE: Infrastructure - Electricity

Sub Issues	Officer response
<p>WPD [may have] [has] a number of strategic electricity distribution circuits (which can operate at 132,000 Volts, 66,000 Volts and 33,000 Volts) in some of the area's being considered for development. These circuits may run both underground and as overhead lines (on either towers/pylons or wood poles). WPD may also have electricity substations in these areas. Would expect developers of a site to pay to divert less strategic electricity circuits operating at 11,000 Volts (11kV) or below. This may include undergrounding some 11kV and low voltage overhead lines as necessary.</p> <p>WPD would normally seek to retain the position of electricity circuits operating at 132,000 Volts (132kV) and 66,000 Volts (66kV) and in some cases 33,000 Volts (33kV), particularly if the diversion of such circuits placed a financial obligation on WPD to either divert or underground them as WPD would not be party to any planning application and any such obligation would also go against the statutory and regulatory requirement on WPD to operate an</p>	Noted. It is expected that developers will engage directly with WPD in relation to their development proposals. Furthermore, WPD will be engaged during the preparation of the Infrastructure Delivery Plans for Bromsgrove and Redditch.

<p>economic and efficient electricity distribution system.</p> <p>WPD does not generally have any restriction on the type of development possible in proximity to its strategic overhead lines but it would be sensible for planning guidance and layout of developments to take WPD's position into account and consider uses compatible with the retention of strategic overhead lines</p>	
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KEY ISSUE: Miscellaneous – Planning/ consultation process

Sub Issues	Officer response
<p>Constructive 'consultation' on future building sites without choices is a misnomer, focusing on the wording of 'chosen' vs 'preferred' options</p>	<p>Consultation was undertaken on broad areas for development in 2010, following this, 20 potential areas have been analysed in the HGDS. It is therefore appropriate at this stage for the Councils to choose a preferred option as this is required for the plan-making process.</p>
<p>Question whether all stakeholders and residents in the area have been notified of development</p>	<p>All statutory consultees and residents on both Councils planning consultation databases were notified of the Housing Growth consultation period. Consultation was also advertised on both Councils websites, in local press, posters in public buildings and the Kingfisher Shopping Centre. Posters and consultation material was placed in the Redditch public libraries and One Stop Shops. Six drop-in sessions were advertised and Parish Councils notified. Letters were posted out to all properties in the whole of Area 4/ Foxlydiate area due to free papers not being received here and the isolated nature of many of the properties .</p> <p>If residents want to be notified of the future plan-making stages, they can be added to the databases at any time.</p> <p>When any planning application is submitted, residents and stakeholders will be consulted and given the opportunity to comment on the detailed proposals.</p>
<p>Why haven't other Council's cooperated with Redditch under the Localism Act</p>	<p>Both Redditch and Bromsgrove Councils consider they have fulfilled the requirements of the Localism Act in terms of the duty to cooperate. Duty to cooperate has been successful with neighbouring Stratford</p>

Sub Issues	Officer response
<p>Local Authorities should be able demonstrate that they have liaised productively with adjoining Authorities in the Redditch case, Bromsgrove and Stratford according to Para 110 of Localisation Act. Several plans have been returned by Planning Inspectorate in Coventry and North Worcestershire, where this cross-border co-operation hasn't happened. Has this cross border co-operation actually been taken seriously and pursued effectively and thoroughly in this Redditch Growth documentation?</p>	<p>District. The authorities will be completing more work to prepare for submission versions of their Plans to ensure the duty to cooperate is complied with.</p>
<p>Stratford is at risk under the Duty to Cooperate for not engaging more constructively in cross boundary co-operation.</p>	<p>Stratford on Avon District Council is considered to be complying with the duty to cooperate with the allocations for Redditch to meet Redditch's needs for employment at Redditch Eastern Gateway and in exploring potential for small scale housing in the A435 Corridor. It is not for Redditch and Bromsgrove to comment on Stratford's interaction with other neighbouring authorities.</p>
<p>Six weeks is inadequate to respond to such complex planning proposals. How will residents be able to assimilate, analyse such a plethora of information?</p> <p>Why is the current proposal being rushed through? Your various committees/bodies must have been working on this for years behind closed doors – why should those who this most effects be given only weeks to consider/challenge the proposition and come up with alternatives?</p>	<p>Six weeks for consultation is the standard timeframe set out in both Councils adopted Statement of Community Involvement which described how consultation at different stages will be carried out. The drafting of the plans has taken a long time for both Council's and it cannot be considered as being rushed.</p>
<p>There has been no accumulation of worthwhile evidence produced by this Council and its favoured developers to show favour for Webheath and Local Plan No.4 in a comparison study of all potential sites. This is undemocratic and by Local Government law borders on illegal</p>	<p>The process of drafting Local Plan No.4 and the HGDS explains the rationale for the selection of sites in a transparent manner.</p>
<p>Has been arranged underhandedly as I was not aware until now. People of Redditch would not approve such a development</p>	<p>Disagree, the opportunities to view the document and attend the drop in sessions have been well advertised to every resident through the local press and on the Council's website, plus through posters in Councils buildings. There has been a good response to consultation.</p>
<p>Redditch has a responsibly to their residents and shouldn't be bullied into accepting what Bromsgrove offers, it just isn't acceptable.</p>	<p>This is not the case; the HGDS was undertaken by both Redditch and Bromsgrove officers and agreed for consultation by both Councils</p>

Sub Issues	Officer response
<p>You have been warned by your officers that you risk non-compliance under Duty to cooperate of the Localism Act. This Act simply says that when there are very strong reasons to work together on planning issues in the interests of all local residents, then that should happen. It should not be used to threaten Councillors to revoke democratic decisions already taken. The Localism Act states "The act devolves greater powers to Councils and neighbourhoods and gives local communities more control over housing and planning in their area".</p> <p>Three tiers of government opposed HGDS proposals particularly:</p> <ul style="list-style-type: none"> • Bentley Pauncefoot Parish Council submitted objections • Leader of BDC stated publicly "we don't want these houses, we don't want to destroy our green belt". • MP for Bromsgrove expressed his "opposition to the building of thousands of houses in our green belt". <p>BDC cherry-picking the Localism Act to the detriment of "Rights and Powers for communities and individuals". Using this to put on RBC to have a re-vote to agree the joint consultation and its decision to go ahead with the consultation even if RBC did not decide to go ahead.</p> <p>Bromsgrove does not have to comply and assist the Redditch Growth plan, it can say no and listen to its own population who do not want this development for many valid reasons.</p> <p>Government policy on Localism is guidance not mandatory. Councils have fiduciary duty to act in the interest of the local population hence democracy. Not in the spirit of localism, partnership or democratic process. Puts Councillors in an impossible position.</p> <p>Redditch took the decision to become a New Town nearly 50 years ago, why should Bromsgrove take up slack when Redditch has already exercised its development option?</p>	<p>The Duty to Cooperate is a piece of legislation introduced through the Localism Act (section 110). The Duty requires Local Planning Authorities and other key stakeholders to cooperate with each other on strategic matters. The Localism Act states that Local Planning Authorities and other key stakeholders are required to engage constructively, actively and on an on-going basis in any process by means of which development plan documents are prepared so far as relating to a strategic matter.</p> <p>The Parish Council's comments will be considered as part of the consultation. The BDC leader has in his duty as part of the Cabinet and Council for BDC has agreed to put the HGDS on consultation so that the District Plan complies with national policy. The MP for Bromsgrove has also responded to the consultation and those comments will be considered as part of the consultation.</p> <p>It is unclear from the respondent which part(s) of the Localism Act concerning rights and powers to communities and individuals are being excluded from consideration.</p> <p>With regards to Redditch New Town comments this does not relate to growth locations required to meet housing and employment requirements between 2011 and 2030.</p>

Sub Issues	Officer response
<p>The localism act appears to be being breached i.e. no consideration for local views factored into the equation. Your dept. has produced this “Hobson's choice” site proposal</p>	<p>The key part of the Localism Act is the Duty to Cooperate, introduced through the Localism Act (section 110). The Duty requires Local Planning Authorities and other key stakeholders to cooperate with each other on strategic matters. The Localism Act states that Local Planning Authorities and other key stakeholders are required to engage constructively, actively and on an on-going basis in any process by means of which development plan documents are prepared so far as relating to a strategic matter. It is considered that this is being complied with.</p>
<p>Bromsgrove bulldozing through Foxlydiate, with a complete rejection of any other site on the boundary of the two boroughs</p>	<p>This is not the proposal of one Council; it is both Bromsgrove and Redditch. The sites were chosen after analysis of 20 different sites being considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt.</p>
<p>I was at a meeting where it was agreed that leaflets should be included within the council tax post. I am still waiting.</p> <p>No communication to Area 4 (Site 1) residents from BDC until a few days before joint consultation period commenced. BDC Planner at Bentley Drop-In session conceded that a letter to Area 4 (Site 1) residents to let them know the situation as it developed would have been reasonable.</p> <p>Why have the population surrounding proposed sites (Bentley) not been informed by the Council via post of the plans. There are many who have no idea and their views will not be heard. I was informed by a Council officer at a recent meeting that the Council were not able to inform the public as they did not have contact details, which is rather surprising as voters, council tax payers we receive communication. This is inexcusable and one I believe could be seriously challenged.</p>	<p>These leaflets were to be sent out with the Council Tax reminder letters. However because the consultation was not agreed at the first Full Council meeting in Redditch, the deadline for sending out the leaflets passed and the opportunity was lost.</p> <p>Notification of the consultation period was carried out in accordance with the SCI (Statement of Community Involvement). This document has been in place since June 2006. All statutory consultees and residents on both Councils planning consultation databases were notified of the Housing Growth consultation period. Consultation was also advertised on both Councils websites, in local press, posters in public buildings and the Kingfisher Shopping Centre. Posters and consultation material was placed in the Redditch public libraries and One Stop Shops. Six drop-in sessions were advertised and Parish Councils notified.</p> <p>If residents want to be notified of the future plan-making stages, they can be added to the databases at any time.</p>

Sub Issues	Officer response
<p>Very disappointed with lack of information and contact with people. A lot are not really sure what is going on and where these houses will be built all due to lack of information.</p> <p>Limited notification of drop-in sessions. All residents likely to be affected should have received a leaflet. Request denied due to cost. Instead a minimal number printed and left to Parish Council and local volunteers to deliver. Hence a limited awareness of situation. Not good enough to guide people to the website (as per Emma Baker's email to Lynda Warby, 2 April). Communications costs should be in the plan.</p>	<p>When any planning application is submitted, residents and stakeholders will be consulted and given the opportunity to comment on the detailed proposals.</p>
<p>I believe plans are further progressed that we are led to believe.</p>	<p>The status of the draft Plan for Redditch and Bromsgrove and the consultation on the Housing Growth for Redditch has been sufficient explained in the HGDS and the Plan. The future stages have also been explained, and it is not possible to advance the two plans any further or quicker than has been planned.</p>
<p>No planned drop-in session at Bentley although this was most affected community in Area 4 (Site 1). Had to make a special request for this to be held. Why did Alvechurch village hall have a drop-in session planned? How is Alvechurch affected by any of this? Why were initial Council planning meetings held in the Alvechurch area when the proposals had changed from Bordesley to Bentley, Foxlydiate and Webheath was this a plan by the Council to ensure those affected would not know of the venue in order to voice an opinion.</p>	<p>The sites for the drop in session were the ones readily available for the sessions. Alvechurch have been used previously for the consultation in 2010 and received a reasonable attendance, particularly from people in Alvechurch parish. The venues were advertised equally and were well attended.</p>
<p>The developers are leading the council. This site would not be a decision for Redditch people, it would be chosen because it is the most profitable and developers are pushing for it. At the consultation your representatives could give no valid argument for this development over other potential sites other than it is what the developers want.</p>	<p>The sites were chosen after analysis of 20 different sites being considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could successfully integrate into the built form of Redditch and cause least harm to the Green Belt. There is no consideration of profit. Potential developers exist within many of the sites so it is not reasonable to suggest that the sites exist only where there is interest.</p>
<p>The Council would not have sufficient funding to support upgrading</p>	<p>It is normal for private housebuilders to require a reasonable profit</p>

Sub Issues	Officer response
major roads to cope with the demands, however, a construction firm who want the new house building business have offered to fund major works, this clearly shows the extreme profit some companies will gain.	from developments that they provide.
Why build in one place instead of spreading the load? I suspect it is to limit the vote losing potential of the plan; you scarify any support you have in Webheath and Bentley and hope to garnish support from areas where no development is taking place.	Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.
To access information on Sites other than 1 and 2 requires access to the Council's website. Not everyone has such access.	All evidence published supporting the consultation was available at the drop in sessions for people to read. Also it was explained within the consultation material that anybody can come to the two Council's offices to view any material if they did not have access. The documents themselves also state that CDs can be made available if people do not have internet access.
It has been hard to submit information through the Redditch website. There were no links to the correct section	There are links to the consultation document from the RBC website and the BDC website and there have been no technical issues reported. The respondent has submitted their comments
EA recommend that WCS is updated to reflect the latest proposals	Site specific Drainage strategies and FRA are being completed to supplement the information in the Council's WCS.
There should be continued discussions with Severn Trent Water in establishing the constraints, upgrade requirements and implications for development, as part of the process for updating the WCS report/producing an Infrastructure Delivery Plan.	Noted, this is being undertaken by both Councils
BDC, RBC, 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.	There would be no liability on public bodies if the proper assessments and mitigation to alleviate any risks from flooding have been approved and undertaken to appropriate standards.
The first consultation period included school Easter holidays. The second is due during August – good for Planners taking their holidays, bad for residents. Considering the seriousness of the	Availability of planning officers to undertake consultation is not a concern. Where bank holidays fall within consultation periods, extra days can be added to the consultation period to allow for this. The

Sub Issues	Officer response
<p>consultation process and that it relates to adults a “smiley face” symbol is inappropriate and patronising.</p>	<p>system of adding smiley faces to the documents is a simple and effective way of describing when input has been/is sought during consultation.</p>
<p>On speaking to a BDC Planner at the Bentley Drop-In session, he conceded that there could have been a consultation on the five areas taken forward to the focused appraisal stage, but instead BDC had chosen to skip this stage.</p> <p>BDC have narrowed the consultation to one option two areas only (sites 1 and 2) and are leaving it to residents to back-track to reassess all the five areas.</p> <p>To consult on only two options is contrary to Bromsgrove’s SCI, Page 13, section 7 ‘how we will involve people’</p> <p>A consultation should provide all options available to enable full consideration. It should not be fait en compli</p>	<p>This is incorrect; the consultation took place on the wider areas in 2010.</p> <p>The consultation was instigated by both BDC and RBC, so this is not one Council’s choice. The wider options have already been consulted up, and it was necessary to select a preferred option before the Council’s published a plan with an allocation or allocations proposed within them.</p>
<p>To residents it has been stated by planners and councillors that only “new evidence” will be considered. So why are planning officers not asking for evidence in this process?</p> <p>The response forms are not fit for purpose. They seek people’s views which is different. Most will only be able to state their views. How are planners going to use this information?</p>	<p>This is what the consultation period is for, to receive new information or evidence.</p> <p>Most people have chosen not to use the response forms to respond, and the form was only provided to guide some members of the public in their responses but there has been no restriction and many have taken the opportunity to submit their views in a variety of ways.</p>
<p>Ruth Bamford said at the RBC meeting on the 25 March, that: <i>“no volume of public response against the proposal could count as a material factor in the decision making process...”</i></p> <p>Therefore this is a “tick box” exercise only and the reason for not “consulting” previously in relation to the five areas taken forward to the focused appraisal stage.</p> <p>There should be some benchmarks established prior to consultation that would give people a measure to refer to when the Council</p>	<p>Disagree, the content of the responses and the evidence submitted it what will be taken into account, this is standard practice in plan-making. The previous joint consultation on wider areas was undertaken in 2010 so it is unclear why the respondent believes it has not taken place before.</p>

Sub Issues	Officer response
reaches its conclusions, i.e. at what level of objection you deem the scheme 'unsuitable'	
There were no hard copies available for residents or the Action Groups. The request for hard copies was turned down due to cost. Residents therefore had to pay to have copies printed. Communications costs should be in the plan.	It is not feasible to reproduce such large copies for anybody who asks as there are limited budgets; therefore all documents can be accessed online on the consultation website.
RBC website said personal (addresses) would not be published.	Names or addresses of those writing into the consultation will not be published as part of the Councils response to the representations received. However, all representations received are a matter of public record and can be viewed upon request.
At consultation representatives could give no valid argument for this development over other potential sites other than it is what the developers want	The HGDS explains the rationale for the consultation and the officer's endeavour at the events to answer questions from the members of the public, about the consultation and the contents of the consultation documents.
Question soundness of consultations. It was not clear that: a) there are two consultations on-going b) what their interrelationship is. Some information is confusing e.g. the Foxlydiate site shown as Site 1 in Housing Growth leaflet but Site 4 in Executive Summary. Information about Local Plan No.4 hard to find at event and not all staff aware of it's existence.	<p>The HGDS was advertised in the local newspapers, posters through the Town and in Council buildings, and a separate website and drop in sessions were very well attended.</p> <p>RBC, to avoid confusion between the HGDS and the Local Plan consultations, has advertised separately and written to consultees separately. The map referred to explains clearly that the blue designated areas within Redditch are related to Local Plan No.4 and they are considered to be labelled clearly. All officers attending the events were aware of the Local Plan No.4 consultation; however Bromsgrove officers sought out Redditch officers to talk about the Redditch plan to any members of the public asking to discuss it.</p>
Why haven't the visually impaired been taken into account?	It is unclear what this comment refers to. Events for consultation were advertised at a variety of accessible locations. The consultation documents state that the Councils consider reasonable requests to provide them in accessible formats such as large print, Braille, Moon, audio CD or tape or on computer CD.

Sub Issues	Officer response
<p>Study should have been produced before the draft Local Plan. Since the purpose of the HGDS informs the Local Plan process, it is astonishing that the two are published together.</p> <p>Both documents out for consultation at the same time, which gives the appearance that the two have been prepared independently and that there is little intention of allowing public response to either influencing the other.</p>	<p>The study is required to inform the Local Plan and District Plan. The Local Plan for Redditch was put on consultation at the same time as the HGDS and they were consistent in their references. It is impossible to separate the issue of Redditch growth internally and externally.</p> <p>Redditch Local Plan No.4 has been prepared independently by Redditch officers and agreed for consultation by Redditch members; however the same Redditch officers have prepared the HGDS with Bromsgrove officers. It is unclear why the respondent thinks there is no public response allowed when they have responded alongside many others during the advertised consultation period.</p>
<p>Page 6 of the HGDS presents Local Plan 4 as if it is already policy.</p>	<p>On Page 6 the only reference to Local Plan No.4 is para 1.23 which states "The results of this consultation will be incorporated in the draft Local and District Plans (previously called the Core Strategy) of both Councils." This refers to the documents correctly as draft versions, not existing policy.</p>
<p>No leaflet has been posted through resident's letterboxes in Webheath</p>	<p>The Housing Growth Consultation concerned all twenty areas around the edge of Redditch and not just Webheath, therefore leaflets being delivered to only one area was not justified. It was not feasible to leaflet all residents within and around Redditch separately and the opportunity to post fliers with the Council Tax letters had passed before the consultation was approved.</p>
<p>Advertising of Redditch Growth is poor.</p> <p>The planned RBC consultation drop in sessions have been poorly advertised</p>	<p>Disagree.</p> <p>All statutory consultees and residents on both Councils planning consultation databases were notified of the Housing Growth consultation period. Consultation was also advertised on both Councils websites, in local press, posters in public buildings and the Kingfisher Shopping Centre. Posters and consultation material was placed in the Redditch public libraries and One Stop Shops. Six drop-in sessions were advertised and Parish Councils notified.</p> <p>If residents want to be notified of the future plan-making stages, they</p>

Sub Issues	Officer response
	<p>can be added to the databases at any time.</p> <p>When any planning application is submitted, residents and stakeholders will be consulted and given the opportunity to comment on the detailed proposals.</p>
<p>Highly suspicious nature of the re-submitting of the Redditch Growth report, so quickly, after it was thrown out at the RBC Full Council meeting on the 12th February. The time frame, vague wording in RBC constitution and the reason given that compliance with the Localism Act is paramount, should be tested in law.</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>
<p>WAG collected evidence that residents of Webheath do not want large scale housing developments upon the Webheath ADR and Foxlydiate. Neighbourhood Planning within the Localism Act (2011) has influenced this work. This evidence is:</p> <ul style="list-style-type: none"> - Petition 2011 - Against any development of the Webheath ADR & Foxlydiate - 1,016 signatures. - Petition 2012 - Urging the Planning Committee to refuse development - 1,283 signatures. - Surveys 2012 - 133 Webheath residents completed a detailed online survey i.e. 65% said No new houses, 31% said 0 to 50 houses, and 4% said 50 to 100 houses. See Appendix One Page 5 of 122 (Webheath Neighbourhood Planning Consultation Survey - Future Housing - Key Interim Findings - 31/07/2012) - Petition (Online & continuing) Feb. 2013 - Against any development of the Webheath ADR & Foxlydiate - 1,008 signatures, so far and still open. 	<p>Noted and petitions/survey have been received.</p>
<p>Planning officers over-influenced by what land developers have put forward. May be appropriate for a short-term technical document such as a SHLAA, but development land is more valuable than agricultural land, so ownership should not be a prime consideration in looking almost 20 years ahead</p>	<p>Developers of the sites have information that can inform the Council's decisions, so if the work is corroborated by officers there is no issue with using it, especially if its related to the delivery of the site. However, for this consultation the HGDS was an officer led analysis of sites which looked at 20 sites irrespective of ownerships.</p>

Sub Issues	Officer response
For a proposal of this magnitude, I would have thought that the interests of both Bromsgrove and Redditch would have been well served by RBC setting out its position and BDC then examining Redditch's plan and setting out its own separate position.	Bromsgrove and Redditch Councils need to demonstrate how the policies and proposals which deal with cross boundary issues have benefitted both areas, and that meaningful cooperation has been achieved. There are benefits to both Councils for an agreement on areas to be met by undertaking the work in cooperation.

KEY ISSUE: Miscellaneous – Democratic process

Sub Issues	Officer response
The council, which is elected by Redditch residents and should represent their wishes	Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.
It would appear the system is corrupt with biased decisions	The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.
Why have the members of OUR Redditch council been so misled by the few into believing the best for all is being done?	The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.
I question the democratic process used by Redditch Borough Council to force this through. The first vote to put the plans out for consultation was defeated. Yet RBC decided to hold a second vote	The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to

Sub Issues	Officer response
<p>despite the lack of new material to support this second vote. The second vote was only won by a single vote - which suggests this is a highly controversial plan. With the development plans of Redditch for the next 20 years at stake, surely this needs the support of all political parties and the all residents.</p> <p>Why does everyone opposed to these development proposals, and not just the residents of the areas in question, believe that OUR council are ignoring our feelings and fears and despite their statement of wholehearted service to the community who pay their expenses and who voted them in in the first place.</p> <p>I do not approve of the undemocratic processes so far leveraged by the Redditch Borough Council to implement this plan, in continually disregarding the interests of local people such as myself whose lives are likely to be seriously negatively impacted by the proposal.</p> <p>To have to watch a so called senior Redditch councillor smirk at the dismay of the Webheath residents at the town hall meeting to vote for the consultation, is so disgusting.</p> <p>Council treating local residents disrespectfully and unfairly. The vote at recalled 25th March was Labour versus Conservative game. Convenient excuse for no public speaking using PURDAH as a</p>	<p>consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p> <p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p> <p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p> <p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p> <p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and</p>

Sub Issues	Officer response
<p>reason. This proves we cannot rely on elected Council to make sound and logical decisions on the future of our town.</p>	<p>Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p>
<p>Residents are being patronised and seriously let down by the apparent relentless drive the council displays to appease Central Government, the developers and their own self interests.</p>	<p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p>
<p>Think twice Mr and Mrs Councillor before you finally decide. There are a heck of a lot more voters in the threatened areas than in the alternatives (considered or not considered). We shall take care of you at the next election if you display a lack of intelligence, business sense, compassion and consideration for the people who put you where you are and expect the best decisions to be made for the people who count in this fair town.</p>	<p>Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. As Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers.</p>
<p>I object to a Council who cannot organise a vote to go to consultation and then calls another public vote which is carried by 1. The public had no chance to verify that vote and had to rely solely on a hand count by the Chair who could not get it right the first time. No wonder this Council is so easily gulled by the widely more experienced spin and sales personnel of the developers</p> <p>Britain has always been proud of its democracy: these proposals imply that residents are merely an obstacle to be overcome, rather than valued individuals who invest in their surroundings.</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>
<p>How can an area of this size be destroyed by a set of councillors who we haven't elected and have no influence over? How can they actually make decisions about our future without the public scrutiny of</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to</p>

Sub Issues	Officer response
<p>those most affected? This is not democracy and if Bromsgrove Councillors are already saying it is the right place from their point of view, what good is consultation?</p> <p>If I had a suspicious nature, I would wonder if this is a political decision/agreement to keep Bromsgrove Councillors happy. I wonder where their Leader lives?</p>	<p>consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p> <p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p>
<p>http://www.bromsgrovestandard.co.uk/2012/12/09/news-Row-over-planning-rules-57683.html#ixzz2EIV5TSiy</p> <p>It shows how Hollingworth allegedly operates - it shows how he uses his office to make biased decisions about his ward and where he lives.</p> <p>Just as he has (allegedly) influenced the decision by RBC/BDC planners to propose building thousands of houses in Foxlydiate instead of where it is more Sustainable in Bordesley.</p> <p>I am not alone in feeling like the people of Redditch are being dealt with by BDC like scum. You only have to read councillor Hollingworth's comments in the press to see that he in particular does not welcome the situation of co-operating with Redditch in facilitating these houses. I thoroughly reject the 'chosen sites' as being valid choices, I do not feel like we have been given fair chance to have our say.</p>	<p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p> <p>These are serious allegations made against an individual councillor, which the Monitoring Officer would wish to address and any information that can substantiate them should be referred to the Monitoring Officer as outlined above.</p>
<p>How many of you making the decisions actually live in the vicinities ruined? A leading Redditch Councillor residing in the Charford area of Bromsgrove doesn't sound quite right to me. What the eye doesn't see, the heart doesn't grieve over.</p>	<p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details</p>

Sub Issues	Officer response
<p>Any Councillor with a vested personal interest, i.e. live in an area that may be impacted upon should not have a major say on any option.</p>	<p>can be found on the Councils website.</p> <p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p>
<p>It was really interesting that at the council meeting, the Conservative Councillors 'objected' and the Labour Councillors carried the motion with self-satisfied smug expressions. I ask you to take a look at where those Labour Councillors live. How many live in Webheath and Foxlydiate? I bet that the answer is less than 1! So they won't be affected in the slightest! It makes you wonder if there have been any nice arrangements made between the developers and the councillors. With the way that the voting went, I would expect the council to carry out an investigation.</p> <p>Do any of the Councillors live in Bordesley? If so how many and what are their views on the proposal or need we ask.</p>	<p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p>
<p>Bromsgrove weaker council has dictated where they want the un-needed dwellings to be a blight on Redditch & it seems Redditch council currently led by a Bromsgrove person has meekly acquiesced.</p> <p>It is quite obvious that Redditch Council is deferring to the demands of Bromsgrove Council and in particular Labour Councillors are voting en bloc to determine the fate of Webheath residents, the majority of whom are Tories.</p> <p>Don't let Bromsgrove council dictate where the development should be.</p>	<p>All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.</p>
<p>Bromsgrove will gain a payment for the land, the revenue from Council Tax and yet none of the liabilities such as the drain on our</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the</p>

Sub Issues	Officer response
resources	proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.
It appears that although the idea was never put to the vote at a local election a cross-border arrangement to consider growth of housing on Green Belt Land has been made. This at the very least is undemocratic and the excuse that if the electors don't like it then they can vote it out is fatuous as Redditch Council "decided" to have only one-third of itself elected at an election. I do not remember this being put to the electorate either.	The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.
Is a council member doing business behind the scenes with a developer?	All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.
<p>Given the depth of collaboration between Bromsgrove and Redditch Councils in this planning initiative and wider services, perhaps it is now time to open the local debate for merger of the two councils. In doing so creating greater transparency in decisions for the public and enhancing cost savings in both councillor posts, managers, administrators and especially planners.</p> <p>Is it the intention politically to join Redditch and Bromsgrove town together, and therefore develop houses on the land between the two to bring this about in a practical way?</p> <p>The Councils have decided to join Bromsgrove and Redditch physically by developing a set of objectives which steers REDDITCH's 'so called' housing need towards improving Bromsgrove's town centre as well as Redditch's.</p>	<p>Redditch Borough and Bromsgrove District Councils are two sovereign organisations, being Local Planning Authority for their respective areas, with two teams of Planning Policy officers. Any question of merger of Councils is a matter for central government and the Government has made clear that it is not proposing further merger of local councils.</p> <p>However, the Duty to Cooperate requires Redditch Borough and Bromsgrove District Councils to work together to find a solution to meet the housing need. The joint objectives relate solely to the cross-boundary growth study in order to ensure that the preferred option for growth benefitted both Plans' Objectives.</p>

Sub Issues	Officer response
<p>BDC residents not aware this vote was taking place therefore only 2 members of the public were present. This contrasts with the “openness” of RBC. The run up to the consultation period was during election campaigning so we were told we were not allowed to speak at meetings.</p> <p>Notes from full BDC meeting of 20 Feb 2013 (when the vote to agree to the joint consultation was taken), were not available before the commencement of the consultation period i.e. 1 April.</p>	<p>Agenda papers and minutes are all published in compliance with the Access to Information Regulations and were in relation to the BDC Council meeting on 20 February 2013.</p>
<p>Failed to meet the requirement of 9 clear working days notice which the Constitution requires for submission of non-procedural motions. A motion to rescind a previous decision is not a procedural motion. This is evidenced by the fact that 7 Labour Members deemed it necessary to sign the paperwork on the 12th March to enable this rescinding of the previous decision.</p>	<p>The report to Full Council in March clearly articulated the cross boundary duties that the Council was bound to consider in light of the proposals with Bromsgrove District Council. Members had a duty to consider these and it would have been inappropriate not to have submitted the information to Council for consideration. The Council was considering an Executive recommendation and it is satisfied that it followed due process and that the decision is valid.</p>

KEY ISSUE: Evidence Base - General

Sub Issues	Officer response
<p>Another consultation document is required with ALL potential options for a fair consultation</p>	<p>This consultation was undertaken in 2010 and all 20 areas have been analysed in the HGDS. It is appropriate at this stage for the Councils to present a preferred option.</p>
<p>The number of residents within both these areas (Foxlydiate and Bordesley) should not also be used to finalise the decision of where to build.</p>	<p>This is not a consideration in the selection of sites 1 and 2</p>
<p>The infrastructure and ecological facts should be used not how much money will be donated by the developer</p>	<p>Developer contributions are not a consideration in the selection of sites 1 and 2.</p>
<p>Several years ago in the time of the 'regional strategy' Redditch planners claimed that there was net migration from Redditch. 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>The objectively assessed housing requirements are based upon the information contained within the SHMA 2012.</p>
<p>How much agricultural land will be lost if the proposal is agreed?</p>	<p>Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively assessed</p>

Sub Issues	Officer response
	housing needs. As the land is of a similar agricultural quality across all focussed areas appraised the loss would be equivalent in any area chosen and therefore it is considered to be only a minor constraint to development. It is not known specifically how much land take would be changed from agricultural use to development.
Are all the recommended sites (on the Consultation leaflet) chosen by the planners or have councillors had any input?	All consultation material had approval from both Councils' members at Full Council.
No local knowledge displayed by the decision makers	This is not the case, all sites have been analysed and officers have undertaken numerous site visits throughout the preparation of the HGDS and the decision to consult was made by elected members of both authorities.
How do you expect people to give evidence based alternatives without having access to detailed information on alternative sites? There was nothing in the consultation which provided any information on alternatives or any summaries to enable people to arrive at suggested evidence-based sites	The information on alternatives was included in the HGDS and assessed through SA. All background evidence is available on the councils website and the consultation website.
Consider the impact of population growth on existing church buildings and where necessary, increase the capacity of the buildings to allow for additional activities (i.e. St Phillips Church, Webheath). This would be determined by the scope of the development and the changing demographic. Discussions should take place between developers and Churches Together in Redditch as soon as possible	This is for the church building to decide and submit a planning application for and is not related to the purpose of the HGDS.
Would promote faith based partnership in education. Discussions should take place with regional church education authorities	It is not the within the remit of planning policy to implement initiatives/partnerships such as these.
The options or 'chosen sites' for us to be consulted on are not proper. There should have been opportunity for the people of Redditch to give their opinion on where we could possibly build this number of houses. As it is we have no choice as the chosen sites conveniently give just the right capacity to meet the extra target number of houses.	This is the purpose of public consultation
Too much of the housing plan does not appear to join up with other areas of council work, it doesn't feel coordinated with wellbeing, community safety, transport, reducing carbon emission, young people plans.	The potential development would need to take into account the other policies contained within the Bromsgrove District Plan which is coordinated with Council services and aspirations for the Council.

KEY ISSUE: Evidence base – Housing Growth Development Study

Sub Issues	Officer response
Very well researched and very in-depth	Noted.
<p>Proposals to select Foxlydiate in preference to Bordesley are deeply flawed</p> <p>Recognise the need for additional housing but scale and location is flawed. Needs to be reconsidered and alternatives discussed</p>	<p>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.</p>
<p>Why has the latest “Housing Growth Background Document-January 2013” been prepared by in house planners and not independent consultants.</p>	<p>The officers of the Councils are competent and trained and have experience of the areas. WYG second stage report was completed by independent consultants and was largely discredited by the WMRSS Panel report recommendations.</p>
<p>Foxlydiate has been thrown into the pot at the last minute without due research, consultation, & consideration. Was not evaluated as part of previous Core Plans</p>	<p>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.</p> <p>In any case the two Councils have consulted on this previously in 2010</p>
<p>A number of very weak arguments why Area 8 Bordesley – should not be considered. One of them is the people living here will not shop in Redditch. No evidence to show how Officers came to this conclusion. In Redditch there are 3 major supermarket chains (Tesco, Sainsbury, Morisson’s) one of which is a stones throw from this site. Redditch has Debenham’s, Marks & Spencer’s, B&Q, Matalan, and Homebase etc. Seems nonsensical they would travel to Alvechurch or Rowney Green instead.</p>	<p>The HGDS at para 6.4.30 only describes the distances to Alvechurch and Rowney Green facilities</p>
<p>Report identifying Foxlydiate and Brockhill East as the two most suitable areas flies in the face of other detailed reports supported by RBC. On what “balance” has this decision been made? This should be made public</p>	<p>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. WYG second stage report was completed by independent consultants and was largely discredited by the WMRSS Panel report recommendations. The HGDS has been made public, that is why there are responses to</p>

Sub Issues	Officer response
	this consultation.
<p>Housing Growth Study (Area 4): Holyoakes Pit (medieval pit/pool is omitted from report but is well documented on maps² and historical documents³) The pits and the brook are important both in terms of wildlife and rural employment.</p> <p>² Tithe map 1836, ordnance survey may 1927</p> <p>³ Dickens, M (1931) "Thomas Holliock has a farm by indenture under the conventional seal of Bordesley 4th day of February 27th Henry VIII" This lease includes the woods, hedgerows, underwoods and pyttes including water in pool meadow and sufficient wood to repair house, hedge, ploughs, carts and waggons.</p>	<p>Noted, In undertaking GI work, the historic environment character zones and the sites heritage assets are considered and constraints for biodiversity will feed into the strategy for GI so that biodiversity gains can be achieved.</p>
<p>Why, strengths under Area 4, have been listed, but have not been listed under the other areas: "Effects of sprawl, encroachment and coalescence and limited" "Could integrate well with existing built form of Redditch" "Improvements to access and facilities could provide benefits to wider 'name of area' area" "More likely to enhance Redditch and Bromsgrove Town Centres than encourage movement northwards" All of the above bullet points could all go under the other areas, so why only list under Area 4? Weaknesses applied to Area 8, e.g. distance to existing services/facilities are just not true.</p>	<p>This is referring to the conclusion of the analysis of area 4, and all sites have the same methodology of proving a conclusion to sum up the analysis of the site. 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, so not all conclusions will be the same.</p>
<p>Under Area 5 "Increased traffic flows on A448, Slideslow roundabout, A38 up to junction 1 with M42" Why under Area 4, have you put "Potential to connect to A448" as a Strength? It should be listed as a weakness the same as Area 5</p>	<p>Para 6/2/47 of the HGDS states "The modelling work concludes that development in Area 5 is likely to exert the main pressure on the A448 (Bromsgrove Highway), the Slideslow roundabout and the A38 running northwards to Junction 1 of the M42. These key locations will require further detailed study to assess the specific impact and mitigation required as a result. Although it must be noted similar impacts are felt from other development scenarios and therefore acknowledging that significant improvements will be required, this impact on highways infrastructure is not seen as a barrier to development at this time." This is not listed as a weakness.</p>
<p>Area 4 needs the Weakness of Area 5 "Education, employment, Town Centre and Batchley not within walking distance" and "Public Right Of Way (PROW)". What about the Bridleways in Area 4. Why</p>	<p>The HGDS acknowledges that with Area 4 (in para 6.1.28) "The Town Centre, including a range of facilities at the Kingfisher Shopping Centre, is approx. 4.7km away. Enfield employment area is located</p>

Sub Issues	Officer response
<p>haven't these been listed as a weakness?</p>	<p>approximately 5.5km away. Likely junction improvements on the A448 would increase the overall accessibility of the area, including access to the Town Centre and important employment locations around the town; however access to these facilities would be predominantly dependant on car or bus, without significant improvements to walking and cycling facilities.”</p> <p>Bridleways are not a weakness. Recreational assets would be incorporated into any potential development area. The Green Infrastructure Strategy and Management Plan would maximise opportunities for recreation.</p>
<p>Area 8, states as a weakness “Lack of physical connection to Redditch” The Town Centre is close to the area and easy to access by foot, bike or car. So why has this been listed?</p> <p>“Distance to existing services/facilities” This is the best area for services and facilities, with the newly build Abbey Stadium Fitness and Leisure Centre with newly build swimming pool on its door step.</p> <p>“Likely to require new, costly, bespoke public transport services” This would be the same for all the Areas, so why has only highlight on this area?</p>	<p>Whilst it is one of the closer areas to the Town Centre, the openness of the Arrow Valley Park to the south of area 8 offers no physical connection to the urban form.</p> <p>Access to leisure facilities is not the only consideration when evaluating all types of services and facilities.</p> <p>Area 8 would require a new bespoke bus system which would be costly, whereas in other locations existing networks could be enhanced and expanded.</p>
<p>More information needed on the strong and weak boundaries under Area 8 “No strong defensible GB boundary can be identified”. Is a road not a strong enough boundary? If it is, why in Area 4 does the boundary cross Curr Lane? A road is a very strong boundary line. What is meant by strong/“defensible boundaries”? The A448 (in current proposals) has conveniently been leapfrogged to locate 2800 houses</p>	<p>The HGDS (paras 3.29 to 3.41) set out the methodology for evaluating the strength of boundaries and identifies what constitutes a strong or weak boundary. Cur Lane, as a strong boundary connects to adjacent identified strong boundaries.</p>
<p>Area 8 needs more strengths adding: Road infrastructure very good; Larger Area; Potential for more houses when the next housing growth is needed; Closer to motorway networks; Closer to employment opportunities; More likely to enhance Redditch and</p>	<p>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.</p>

Sub Issues	Officer response
surrounding areas; Could integrate well with existing and proposed built form of Brockhill; Far less impact on quality of life and well being, due to less people living in that area, compared to area 4	These issues have been dealt with in detail in the Area 8 response table.
Mentions no 'Rights of Way' as weaknesses for Area 4 yet they exist (Pumphouse Ln to Hilltop and Curr Ln to Birchfield Rd)	The HGDS does acknowledge the existence of PROW in Area 4 and this could be considered a constraint. However, the weakness identified in Area 5 relates to potential impact on the adjacent historic asset and ecological designations.
Vague in relation to transport infrastructure and road network to support demands of several thousand additional dwellings	Technical work has been carried out by WCC on behalf of BDC and RBC to assess the potential implications of proposed development and to recommend potential transport solutions.
Evaluation of Bordesley site employs unsound methodology and draws false conclusions.	Methodology is consistent across all focussed area appraisals.
It has been suggested by planners that one of the main reasons why Site 1(Area 4) was selected over Area 8 was that it has stronger, more permanent boundaries i.e. the lanes around the area plus a brook. This type of barrier has been proved by this proposed development that a road presents no more safety from urban encroachment than a so called weak boundary of field hedging. If a Council wants to build on Green Belt land they simply jump over a strong boundary as is the case with Foxlydiate Lane in Webheath.	The HGDS (paras 3.29 to 3.41) set out the methodology for evaluating the strength of boundaries and identifies what constitutes a strong or weak boundary. It is necessary to breach existing strong boundaries on the edge of the urban area in order to identify land for growth.
Many inconsistencies in how each of the areas have been handled. Whole process needs to be revisited and looked at in an unbiased way. Each element is not consistent and scoring unfair. Document is unprofessional and assumes that the general public will not bother to scrutinise it in detail. Obvious that the area preferred was decided before analysis was done and the analysis was then carried out to fit.	Methodology is consistent across all focussed area appraisals. Distance measurements were taken from a central point of each area.
Weaknesses not applied consistently. Area 11 is "unsuited for large scale housing development" which is true of Area 4 but that is not listed as a weakness for Area 4. Area 5 has a listed weakness of "Education, employment and town centre not in walking distance".	Not true. Area 11 is not considered suitable for housing due to limited ability to contain urban sprawl and more suited to employment uses. Distance to services/ facilities are identified in all focussed areas as weaknesses, with the exception of Area 6.
Can you confirm what route is used to measure the distance to Redditch Centre from Area 8 Bordesley and Area 4 Foxlydiate?	Distance measurements for all areas were measured from a central point. This approach was taken to ensure consistency between areas

Sub Issues	Officer response
	considered.
Report believes that Webheath is suffering in some way and needs services and revitalising and that a sprawling estate is going to improve this. This is a cynical and patronising statement.	Additional development would put undue pressure on existing services and therefore this would require mitigation through the provision of additional services to serve new development.
Growth Report talks about road infrastructure. For Foxlydiat there is no real comment about what's needed apart from possible connection to A448 yet Bordesley states contribution to bypass but funding gap still likely. How can comparisons be made when there is no information?	Supporting information is contained in the background information – Transport Schemes.
Given that different areas had different strengths and weaknesses, how do you transparently pick without measures to compare HGDS 10.2 states “In order to reach the recommendation on the preferred areas all the planning issues must be considered in order to reach a conclusion”.	A consistent methodology for all site appraisals enables a balanced conclusion to be reached. 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.
<p>Given Area 4 and Area 8 are the only two options capable of taking over 2000 why was area 8 included in only one of the combination scenarios, when area 4 was included in all the others? Again this suggests bias.</p> <p>No explanation within the HGDS or SA of why/how the particular scenarios were identified in combination for appraisal. Why was reduced site on Area 8 not considered? Scoring like this may have elevated it</p>	The scenarios were selected based on the analysis in chapter 6 and the summary of the SA in chapter 7 of the HGDS.
Findings not independently ratified so the study is based on insufficient research, bias and lack of evidence.	The officers of the Councils are competent and trained and have experience of the areas. 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. WYG second stage report was completed by independent consultants and was largely discredited by the WMRSS Panel report recommendations.
Distance from Commerce and Industry: The use of unsubstantiated timings in document/Timings in the HGDS for travel to Redditch from	Approximate travel times have been used.

Sub Issues	Officer response
<p>Area 4. Document mentions a time of 5 minutes travel, this is purely a finger in the air, it is not supported by actual speed of travel, traffic or weather conditions.</p>	
<p>Impact on A448 is underplayed for the Foxlydiate site where it is the only main road, and over played for Brockhill and the North where commuter traffic would flow via three main roads (A448, A441, A435).</p>	<p>Para 6/2/47 of the HGDS states “The modelling work concludes that development in Area 5 is likely to exert the main pressure on the A448 (Bromsgrove Highway), the Slideslow roundabout and the A38 running northwards to Junction 1 of the M42. These key locations will require further detailed study to assess the specific impact and mitigation required as a result. Although it must be noted similar impacts are felt from other development scenarios and therefore acknowledging that significant improvements will be required, this impact on highways infrastructure is not seen as a barrier to development at this time.”</p>
<p>Unclear from literature that there are significant countervailing factors in favour of Webheath/Foxlydiate.</p>	<p>A consistent methodology for all site appraisals enables a balanced conclusion to be reached. 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.</p>
<p>Section 6.1.7 states Area 4 is in a medium to high landscape sensitivity risk but in section 6.1.8 it has been demoted to medium sensitivity risk. Other areas were excluded because they were of medium landscape sensitivity hence this displays lack of objectivity and fairness</p>	<p>Para 6.1.7 of the HGDS states that Area 4 is located within a medium to high landscape sensitivity risk. This level of risk is similar to the other areas subject to this Focussed Area Appraisal. No area has been excluded based solely on landscape sensitivity.</p>

Sub Issues	Officer response
<p>Study identifies flood risk on site 1 but survey information required to objectively assess this is conspicuous in its absence</p> <p>6.1.36 Swans Brook, Spring Brook and an un-named watercourse run through the area. Flood zone definition is only available for Spring Brook and some parts of the area along Spring Brook fall within flood zone 2 and 3; however complete flooding data for Area 4 is not available. Sewer flooding was recorded on the area boundary near Springhill Farm, Foxlydiate Lane</p>	<p>A site specific Flood Risk Assessment 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>With reference to Objective 12, the people of Bentley have been overlooked and let down by their Council if this development proposal is allowed to go ahead and the tranquillity of this quiet rural settlement is lost</p>	<p>Quality of life is more than consideration of environmental concerns. The Councils also have a duty to ensure that objectively assessed housing requirements are met in the Plans, so that peoples need for housing is fulfilled</p>
<p>Statements lifted from HGDS:</p> <p>“Cur Lane, which bisects the area, could be more appropriate strong boundaries within the area to check urban sprawl”. Note: Curr (not Cur) Lane is a pleasant and well loved country lane that happens to be our home. Reference to Curr Lane as a tool to check urban sprawl rather than as something of real rural value (to residents and many visitors that enjoy the leisure opportunities that it offers) shows lack of understanding on the part of the Planners.</p> <p>It appears planners have not visited Area 1, if they had done they would realise that the whole of the development is an encroachment into the countryside. I would ask the planners to visit and familiarise themselves with the local environment to produce a credible argument for and against each site.</p> <p>“6.1.65 Regeneration opportunities 6.1.66 There is no urban/derelict land within the area. There are, however agricultural sheds across the area (Photo 56) which could potentially be incorporated into</p>	<p>The references to all potential boundaries are consistent in their terminology and use throughout the HGDS are not intended to offend existing residents; however technical planning work still needs to be undertaken to ensure that the Plans allocate sufficient land to meet Redditch’s objectively assessed need.</p> <p>This is not the case, all sites have been analysed and officers have undertaken numerous site visits throughout the preparation of the HGDS. Any development proposed around Redditch would constitute an encroachment into the countryside as there is a need to find Greenfield sites outside of the Borough boundaries.</p> <p>It is appropriate to point out the existence of built development within the site. Although the Government does encourage food production the NPPF guides local planning authorities to meet their objectively</p>

Sub Issues	Officer response
<p>future development schemes.” The agricultural sheds are there for a reason, they support the valuable agricultural economy that is threatened by this proposal and that the planners seem to have overlooked when compiling this study.</p>	<p>assessed housing needs.</p>
<p>This is a record of information collected from a number of colleagues at the local authority for which I work, suggesting flaws/concerns stemming from the study:</p> <p>Comments collected from Senior Highways Officer: The Officer questioned the sustainability of a development situated as it is beyond the town boundaries with no significant settlements beyond it and Bromsgrove. Any public transport links that are instigated for this new development (which the Highways Officer present at the drop in session at Lower Bentley Village Hall last month claimed would need to be a 10 minute bus service from Redditch town centre in order to ‘promote the vitality of the town centre’) would be unlikely to be economically viable long term and when the financial assistance from the developer ceases the officer forecasted that the bus service would almost certainly cease unless heavily subsidised by Redditch Borough Council (RBC). Hence this proposal is not sustainable.</p> <p>The Officer questioned at what stage of the development the bus service would be provided. A development of this size will have to be phased, will the bus service be available for the first new residents?</p> <p>Comments collected from Senior Ecology Officer: The isolation of species in Foxlydiat Woods. The physical removal of hedgerows will stop migration of species, fragmenting the habitat and creating a ‘zoo’ effect. See section 6.1.10 of the report referring to an important wildlife corridor. Item 6.1.14 It has been identified that if Area 4 is to be chosen for development it will be necessary to develop on grasslands which house protected species and that this</p>	<p>There is a need to look beyond the boundaries of Redditch because there is no land available within the boundaries to meet the objectively assessed needs for the Borough. The objective of the HDGS was to find the best site that integrates to the Redditch urban area.</p> <p>The policy states “<i>Significant improvements in passenger transport will be required resulting in integrated and regular bus services connecting both sites to key local facilities. In particular, services should be routed through both 1 and 2 which make full use of new and existing walking and cycling routes, such as Sustrans Route No. 5 and Monarch’s Way in 1.</i>” However because Bus Services are operated by private companies, planning policy cannot influence the way they are operated. The Borough Council may choose to subsidise bus services but this is not a determining factor in selecting locations for development.</p> <p>These are details which will be provided when a planning application is being prepared. A travel plan and transport assessment will be produced and the design of the scheme is agreed with the Council and WCC.</p> <p>The aim of the policy is to maximise opportunities for biodiversity, with an overall strategy and management plan for Green Infrastructure. This should include a hedgerow assessment, determining which hedgerows are worthy of retention and protection. A species and habitats survey is being undertaken to ensure mitigation and enhancement of biodiversity.</p>

Sub Issues	Officer response
<p>should be done sensitively. The density of housing required to incorporate 2800 houses onto the area identified will make it impossible to be sensitive to these issues.</p> <p>Look at current policies of both Redditch and Bromsgrove around safeguarding our rural landscapes.</p> <p>Proposals that incorporate loss of valuable agricultural land / Green Belt are likely to need to be carried out under license with Natural England.</p> <p>There are many surveys still outstanding and the officer suggested that it was premature to rule out other areas and concentrate on this area before these studies are carried out and incorporated into the report. Quality evidence is the basis for good decisions. Study fails to illustrate this and conclusions show lack of foundation.</p> <p>The officer questioned the methodology used. There are a lot of words but no substance behind them. How did they arrive at these conclusions? Other local authorities employ a transparent methodology whereby all the criteria are assessed, given a score and then laid out in table format before making public.</p> <p>Interesting statements from National/local policy documents ignored by Council:</p> <p>“The National Planning Policy Framework must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.” (NPPF Page 1)</p> <p>“Our natural environment is essential to our well-being, and it can be better looked after than it has been. Habitats that have been degraded can be restored. Species that have been isolated can be</p>	<p>The NPPF requires that Councils make plans which meet objectively assessed needs</p> <p>Natural England have been consulted and have responded to the consultation on Bromsgrove and Redditch plans.</p> <p>The Councils are required to submit plans which are considered to be sound to the SoS with evidence to back up the contents. Relevant evidence outstanding would be able to either confirm or revise elements of the policy prior to submission.</p> <p>The consultation material and the SA accompanying the consultation are legally compliant and officers consider the methodology used in the HGDS to be presented in a transparent way.</p> <p>The HGDS explains that the NPPF has been taken into account where it is relevant to the consultation document.</p> <p>The introductory statement to the NPPF does not form part of the policy against which planning decision are made</p>

Sub Issues	Officer response
<p>reconnected. Green Belt land that has been depleted of diversity can be refilled by nature – and opened to people to experience it, to the benefit of body and soul.” (Greg Clark, Minister of Planning - Introductory statement NPPF March 2012)</p> <p>“All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.” (NPPF Page 4)</p> <p>When considering edge of centre and out of centre proposals, preference should be given to accessible sites well connected to the town centre (NPPF Page 8)</p>	<p>This requirement of the NPPF has been complied with</p> <p>This is related to town centre uses being located within or on the edge of the town centre, so not relevant to the HGDS.</p>
<p>Where is the list of the scoring questions included and excluded for the Areas?</p>	<p>The methodology of the HGDS chose not to include scoring as a way of analysing the sites because it can be interpreted subjectively</p>
<p>To state vaguely that “a combination of Areas 6 and 8 could have a significant harmful impact on the natural landscape” (paragraph 7.22) when a similar statement could be made about other areas, particularly Area 4 (Site 1) which is of higher landscape sensitivity, is more assertion than evidence.</p>	<p>Para 6.1.7 of the HGDS states that Area 4 is located within a medium to high landscape sensitivity risk. This level of risk is similar to the other areas subject to this Focussed Area Appraisal. No area has been excluded based solely on landscape sensitivity.</p>
<p>The ridge (boundary 10) is a virtual boundary and a poor barrier to physical encroachment. In this section of Area 4 there is no strong physical/tangible boundary to prevent development sprawling from the upper field to the lower field towards Gypsy Lane. The hedge along the ridge is not continuous and has many large gaps (greater than 50 metres in parts). Neither does the ridge work as strong boundary to prevent “visual encroachment”. Development which sits behind the ridge but rises higher than 6 feet can be seen very easily from St Bartholomews Church in Tardebigge, Gypsy Lane, Curr Lane and the middle section of Holyoakes Lane.</p>	<p>Boundary 10 is not just a ridge, there is a hedgerow also and is identified as a strong boundary. The ridge and hedgerow together provide visual containment.</p>
<p>Development at Foxlydiate is contrary to Plan objective 11</p>	<p>A single site cannot meet all 13 strategic objectives</p>
<p>Growth Report has looked deeply into all the sites with an unbiased overall view</p>	<p>Noted.</p>

Sub Issues	Officer response
<p>Growth Report talks about strong defensible boundaries. Surely hedges can be planted to create strong boundaries in Bordesley</p>	<p>The methodology to assess land against the Green Belt purposes and to select defensible boundaries has been derived from an evaluation of other best practice assessments including para 85 of the NPPF: “Local Planning Authorities should... ..define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”</p>
<p>Proposed sites do not meet the Redditch / Bromsgrove strategic objectives: -</p> <p>Paragraph 5 - To focus all new development in sustainable locations with suitable infrastructure provision including green infrastructure.</p> <p>Paragraph 6 - To minimise the loss of Green Belt and areas of high landscape quality.</p> <p>Paragraph 8 – To ensure that both Bromsgrove and Redditch BC are equipped to mitigate against and adapt to the causes of climate change.</p> <p>Paragraph 10 – To minimise waste and increase recycling, including the reuse of land, buildings and building materials where possible</p> <p>This development will impact all of the above</p> <p>Study stresses the importance of the jointly agreed strategic objectives, yet the choice of Site 1 does not meet any of these with the exception of objective 1 “To provide sufficient homes to meet the housing needs of both Bromsgrove District and Redditch Borough” and 13 “To promote high quality design of new developments and the use of sustainable building materials and techniques” which should be met at any other site or combination of sites</p>	<p>The HGDS states at 7.9 “<i>All of the Strategic Objectives would have a positive outcome on development if they were met, as shown by their positive scores (Housing Growth SA main document page 12), but some are more sustainable than others</i>”. A single site cannot meet all 13 strategic objectives. There are some sites within the focussed areas which meet the objectives stated. The methodology of the HGDS chose not to include scoring of each site against objectives as a way of analysing the sites because it can be interpreted subjectively.</p>
<p>You state that the most important strategic objective is: To improve the accessibility of people in both Bromsgrove District and Redditch Borough to employment opportunities and all other facilities and to</p>	<p>The objectives have not been prioritised in the HGDS. Where people choose to be employed is not something that can be controlled through planning policy.</p>

Sub Issues	Officer response
<p>reduce their need to travel; together with the promotion of safer and more sustainable travel patterns and integration of communities. Little evidence of weight being given to where people will find employment up until 2030.</p> <p>Unrealistic to assume everyone living in Redditch will find employment in Redditch over 20 years. No mention of HS2</p>	<p>This assumption has not been made in the HGDS. HS2 is not relevant in determining growth locations around Redditch</p>
<p>Report offers only the single solution of developing Site 1 and Site 2 Brockhill East, not providing other options</p>	<p>This is incorrect, all sites have been analysed and scenarios developed in section 8 of the HGDS. It is appropriate at this stage of plan making for the Councils to consult upon a preferred option, which is sites 1 and 2.</p>
<p>The Study concentrated only on development needs of Redditch. Does not take into account the wider needs of the region</p>	<p>This is not the purpose of the HGDS.</p>
<p>Exclusion of Webheath ADR from the analysis of Area 3 - of which it is clearly an integral part – is a serious failing of the Study.</p>	<p>The Webheath ADR falls within Redditch and is outside of the boundary where this HGDS focuses.</p>
<p>HGDS does not adequately explain why the impact of large scale development on Site 1 is less negative than in other areas and how the benefits of development there outweigh the disadvantages.</p>	<p>The HGDS is extensive and explains how the conclusions about Site 1 and Site 2 have been arrived at.</p>
<p>Whichever area is chosen needs must be met and they would not have a substantive effect on the preferred choice of area. Assume that this is the reason why there are no comments in the Study about telecommunications, gas and electricity supply networks.</p>	<p>These do not provide a significant constraint to development around Redditch</p>
<p>Unfortunate that document does not set out statistics on the land areas and capacities in a table, with a breakdown of the sectors of Area 4, save for an incomplete statement in chapter 8.</p>	<p>Capacities will vary depending on the site constraints and further work being completed now will supplement this information; however indicative capacities have been estimated against each scenario presented in Chapter 8 of the HGDS.</p>
<p>Number of spelling and punctuation errors</p> <p>Long, uses jargon and lacks punctuation: makes comprehension even more difficult for non-planners.</p>	<p>Noted</p>
<p>Area 18 not included in Exec summary. Why? Limits appropriateness of choice of sites</p>	<p>This area was excluded from further analysis. The executive summary only provides detail on the focussed area sites.</p>
<p>'chosen areas' implies the decision has already been made</p>	<p>There needs to be a chosen or preferred option presented for consultation at this stage of plan making. 20 different sites were</p>

Sub Issues	Officer response
	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.
The process used to identify additional housing land has been reasonably comprehensive and underpinned by a number of new studies and evidence.	Noted
Welcomes joint working of the Councils in the production of the Study. Welcome the clear, consistent and comprehensive approach this has provided to identification of a preferred location for accommodating needed housing growth.	Noted.
Study provides a clear explanation of the adopted methodology for identifying suitable locations for housing growth.	Noted.
Welcome the use of a tiered assessment approach involving an initial board area appraisal and then a more focused area appraisal of selected sites.	Noted.
At both stages of the appraisal process the historic environment and heritage assets are addressed at an appropriate level of detail drawing on a relevant evidence base.	Noted. The historic environment and heritage assets will be considered further and will feed into the strategy for Green Infrastructure.
At this early stage of the plan-making process the Study contributes to fulfilling the evidence base requirements of the NPPF, as for example at paras 158 and 157 (point 7) and paras 169 and 170 as well as supporting the core planning principle of conserving heritage assets in a manner appropriate to their significance (paragraph 17, point 10).	Noted
Support the use of the Historic Environment Assessments completed for Bromsgrove and Redditch Councils by Worcestershire County Council - these incorporating information held on the Historic Environment Record; and completion of the detailed assessment 'Hewell Grange Estate – Setting of Heritage Assets Assessment' for Site 5, which is informed by the framework set out in English Heritage's guidance on the Setting of Heritage Assets.	Noted
Without viability assessments for two strategic sites it is impossible to know whether or not these sites can sustain the infrastructure	Viability testing of the two plans is to be undertaken to inform the next version of the District Plan and Local Plan.

Sub Issues	Officer response
<p>requirements proposed such as: - Site 1 including a first school, local centre and associated community infrastructure; - Transport assessments and infrastructure including new and improved accesses, integrated bus services, use of new and existing walking and cycling routes; - Green Infrastructure including maximisation of opportunities for biodiversity and recreation, green corridors along Spring Brook (Site 1) and Red Ditch (Site 2) and the use of Sustainable Urban Drainage (SUD) systems; - High quality design.</p>	
<p>The two sites have been identified without any best practice Landscape/visual assessment of the individual sites or of their relative merits in these terms set against other potential sites.</p>	<p>This is not the purpose of the HGDS</p>
<p>Whilst the HGDS is essentially a Green Belt review, it takes a generalised view of Green Belt impact to each site. There is much emphasis on individual field boundaries to assess where the most appropriate, defensible new Green Belt boundary might lie, but little in the way of a 'high level' analysis of how the overall purposes of the Green belt might be best served through the selection of land for Green Belt release. The different functional attributes of parts of the respective areas are not identified or evaluated.</p>	<p>Under each focussed area appraisal site analysis a section on Green Belt has been included. Under this sub sections on each of the purposes of including land within the Green Belt have been included with an analysis of each focussed site.</p>
<p>Fundamental shortcoming is a blanket 65% conversion factor by HGDS. As a result of RBC's relatively high public open space requirement (it is assumed these would logically be applied by Bromsgrove). On its own, this open space requirement accounts for the vast majority of the 35% gross to net reduction, before any other uses that are to be deducted from the gross site area in each case are taken into account. Area 4 and 6 have a yield that almost exactly matches the 3400 shortfall identified by the consultation. Any slippage in yield from either site has fundamental implications for meeting Redditch's housing requirement.</p>	<p>The discounted land does not relate to RBCs open space requirements, this has not been a factor in influencing the indicative capacities of the sites. There are no factors which would suggest that the capacity of 3400 is not able to be reached by the end of the plan period.</p>
<p>The review of three sites did not fully appraise and consider the vehicular access strategy, the number and location of access points, whether access strategy is deliverability and then assess the subsequent highway impact based on development.</p>	<p>This was not the intention of the HGDS, however this work is being undertaken to inform the next version of the District Plan and Local Plan.</p>
<p>Assessment of growth areas over reliant on existing facilities rather</p>	<p>The policy states that associated community infrastructure is required.</p>

Sub Issues	Officer response
than considering enhancements each site could deliver.	Both the distance to existing facilities and the potential for creation of new facilities have been taken into consideration.

KEY ISSUE: Evidence base – Housing Growth Development Study – Executive Summary

Sub Issues	Officer response
In the HGDS Executive Summary the only ‘Strengths’ in favour of Bordesley are “Potential contribution to Bordesley By Pass (but funding gap still likely)” & “Simpler/cheaper solution to sewerage issues likely”. Other significant advantages have disappeared. Weaknesses are magnified, including “lack of physical connection to Redditch” & “distance to existing services/facilities”, “likely to require new, costly, bespoke, Public transport services”, “flood risk issues”. These points are more applicable to Bentley Pauncefoot yet Area 8 has been discounted & Area 4 is under strong consideration.	These strengths and weaknesses reflect the discussion included within the HGDS.
Whilst a range of sites are listed with strengths and weaknesses of each, there is no associated cost benefit analysis of each option	This is too detailed for this consultation, and too detailed for an executive summary of the HGDS, which includes sufficient information
Executive summary is contradictory. P.5 – Strengths and weaknesses are totally interchangeable P.8 Conclusions are all one-sided in favour of Bromsgrove	It is not clear what the respondent is referring to as being contradictory. The purpose of the HGDS and its consultation is to find the best sites for growth into Bromsgrove surrounding Redditch in order to meet Redditch’s objectively assessed housing requirements, so it is unclear how any statement on page 8 of the Executive summary is favouring Bromsgrove.
While objectives in the introduction to the study are meritable, implementation of objectives in the study is seriously lacking	The Strategy’s objectives are intending to be overarching considerations as context for the HGDS. It will be for the policy to ensure that these objectives are implemented.
Support principle one on the importance of comprehensive Green Infrastructure	Noted.
Welcome principles used to evaluate sites at Broad Area Appraisal stage and agree with initially excluded areas (3a, 7 and 18) which appear to us to be unsuitable for inclusion.	Noted.
Agree that there are good environmental and planning reasons for discounting areas 1, 2, 3, 9, 10, 12, 13, 14, 15, 16, 17, 19 and 20 at broad appraisal stage and that the remainder were worthy of	Noted.

Sub Issues	Officer response
additional scrutiny through the focussed area appraisals.	
Note the methodology used to assess sites in the focussed area appraisals. It has been helpful in highlighting specific areas of biodiversity interest or concern.	Noted.
Exclusion of Area 3a from broad appraisal is unsound. Morton Stanley Park is public open space needed within a town, but the exclusion of a golf course is irrational. The purposes for which the Green Belt can be used include necessary sporting facilities. An 18-hole golf course has substantial land-take and little adverse effect on the openness of the Green Belt. It is a use much more acceptable in open countryside than housing.	It is considered that the towns green spaces, including its golf courses form an important part of Redditch's sports and recreation provision. Part of the Golf course is also covered by important ecological designations.

KEY ISSUE: Evidence base – Housing Growth Development Study – Sustainability Appraisal

Sub Issues	Officer response
SA has been unfairly and inconsistently scored compared with other shortlisted areas. The true score puts Site 1 (Area 4) into a negative sustainability position and should be excluded from consideration for development. (Reference Brooke Smith Planning consultants – BAAG Response)	Noted however the approach taken to analysis of each site by the Council is consistent.
Results of our study show Area 4 is scored unfairly relative to Area 8 (Bordesley). BAAG analysis shows that the actual total score for Area 4 should be -1 rather than +3.	
Document is subjective so with a different reader other areas would be included (Crabbs Cross, Bordesley). The mitigation for exclusion of area 1 could equally apply to area 4 the only difference being area 4 has a potential developer as does Bordesley.	There are a number of issues with Area 1 highlighted in the HGDS and the SA which has led to its exclusion. Some sites, or parts of some sites in the focused area had no developer interest.
Lack of independent validation is relevant in relation to the SA, the scores across areas show inconsistency, subjectivity and bias. Bentley Area Action Group (BAAG) carried out its own SA, no doubt just as scientific as yours, but they endeavoured to be objective and the scores vary	The Councils SA and all evidence will be subject to an examination in public.

Sub Issues	Officer response
Sustainability Appraisal (SA) Non-Technical Summary has no numbered key to the areas and of little help in understanding site selection. Needs further independent review and investigation and needs to be fully referenced so that sources can be checked for bias.	The HGDS contains the detail required to understand the site selection. The Councils SA and all evidence will be subject to an examination in public. Officers do not consider there is any bias in any of the documents.
To include within the SA (unfortunately not part of the main bulk of the Study), details of retail outlets within c 2km of Area 4 and not to do the same for Area 8 does not allow for meaningful comparisons between the two sites.	The SA is required to be prepared independently of the planning related analysis, however the HGDS is required to, and has taken the SA findings into account when determining the selection of site 1 and site 2. The HGDS contains consistent methodology for assessing distance to facilities and retail which the SA has taken into account in analysing the sites.
WYG SA scores Area 4 as 6 against Area 8's score of 14. This shows Area 8 is much more sustainable than Area 4 and Area 4 has a negative sustainability score, it should be excluded from further development proposals as were other areas with a negative score.	WYG did not assess the same areas as the Council have in this process. In any case WYG second stage report was largely discredited by the WMRSS Panel report recommendations.
Inclusion of Webheath ADR for development in Local Plan No.4 is not a reason for investigating Area 3. Its poor judgement to make the assumption that the ADR will meet sustainability criteria without further assessment. Given that approximately half of Area 3 comprises the Webheath ADR, the same judgement will apply to the ADR as to the remainder of Area 3. The score against SA objective S5 should therefore be -2, not the -1 suggested. SA objective E9 should be negative (currently 0) as encouragement towards car based travel inferred detracts from the reduction of causes of climate change.	Area 3 was one of the original WYG areas and all of these have been reassessed through the HGDS for consistency. The HGDS does not assess the ADR land within Redditch. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.
SA objective E8 is not scored, as commentary suggests further studies required to assess its impact against the objective. However, there are already known issues relating to the sustainability of potential sewage pumping which will be required from the Webheath ADR site. There is also a known disused sewage treatment plant within Area 3, which may harbour potential hazards requiring further mitigation. These are public knowledge, so not acceptable to comment that related issues would need to be investigated. Known factors could be scored, and they would undoubtedly result in at best a -1, in place of the current	Sustainability of potential sewage pumping is not a consideration for E8, which relates specifically to the protection and enhancement of the quality of water, soil and air. It is acknowledged that there is a disused sewage treatment plant within Area 3. 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. Therefore, without this additional work, the scoring of '?' is correct as the rationale to support this (SA p. 11) states " <i>Insufficient information may</i>

Sub Issues	Officer response
<p>Distance from the train station for full area 4 stated as 4km – however, much of the (reduced) area is further (the Town Centre and Train Station are within 50m of each other), so positive scoring against SA objective S3 because its ‘within 4km’ should be adjusted to zero rather than current +1.</p> <p>+2 score for SA objective S5 is of concern. When Area 4 was considered as a whole, its Eastern side was considered 4km from Redditch Town Centre and Train Station, and likely to encourage cars but reduces to 3.5km for reduced Area 4 – despite the Western side being over 6km away – this then is deemed likely to promote sustainable travel patterns. Using flawed distances, as such the score for S5 should be reduced to 0.</p>	<p><i>be available to enable an assessment to be made.”</i></p> <p>The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate. The HGDS has consistently used the centre point of each area to measure distances to key facilities and the town centre.</p>
<p>Environmental objective E1 scores -1, although the two SWS’s on site are not mentioned in the commentary. Area 8 matrix commentary includes wording relating to the negative effect development would have on its single SWS, and scores it -2. The E1 score for Reduced Area 4 should be adjusted to -2, or the Area 8 score adjusted to -1 to match Reduced Area 4. Reduced Area 4 has two SWS’s on site, but not referred to in commentary and only scores -1.</p>	<p>The HGDS reflects the existence of SWS in and around Area 8. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>Objective E9 marked +1, related to reducing causes of and adapting to the impact of climate change. Given misleading distances used for proximity to facilities, the potential that the site will not encourage more sustainable travel patterns should adjust this to 0 or -1 as it may increase car usage. This would tie in with scoring for Area 3, partly adjacent to Area 4, and scores 0 on this point.</p>	<p>The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate. The HGDS has consistently used the centre point of each area to measure distances to key facilities and the town centre.</p>
<p>Objective EC3 scored +1 in lieu of ‘close’ proximity to NEW College, which is 3.5km. As NEW College lies further from the site than the Town Centre and Railway Station, this is a flawed argument. South Eastern corner of the area may be within this specification, but the majority of the site is between 4km and 6km from the College. A neutral score for the full Area 4 due to lack of employment is just as relevant for the reduced area 4. The score for EC3 should be adjusted</p>	<p>The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate. The HGDS has consistently used the centre point of each area to measure distances to key facilities and the town centre.</p>

Sub Issues	Officer response
accordingly to 0.	
For Area 6 SA objective S5 contradicts the focussed appraisal by scoring +1 for the positive impacts this area promoted for sustainable travel, highlighting inconsistencies in the analysis of the study.	It is not clear how this analysis and SA scoring is inconsistent with the HGDS analysis
For Area 8 Objective S3 for improving the viability and vitality of Town Centres strangely scored -1. Reduced Area 4 scored +1 despite being further from Town Centre facilities.	The HGDS explains that Area 4 has multiple routes and accessibility to the Town Centre and this is fairly reflected in the SA scoring
Although a school is slightly closer to Reduced Area 4 than Area 8 it is oversubscribed. Growth sites are anticipated to incorporate a new First School, which mitigates this. This score should be adjusted to 0.	The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.
<p>For Area 8 Objective E2 scores -2, with commentary indicating loss of green belt, potential for coalescence with Bordesley and reducing gap between Redditch and Birmingham as reasoning. For Reduced Area 4 only -1 is given, despite the development completely engulfing Foxlydiate, and encouraging coalescence with Tardebigge. Both sites have similar detrimental results and should either adjust Reduced Area 4 to -2 or Area 8 to -1.</p> <p>For Reduced Area 11 SA Objective E2 scores -2 due to potential coalescence with Bordesley, and reduction of strategic gaps between Redditch /Alvechurch /Bromsgrove /Birmingham. Reduced Area 4 scores only -1 for E2, despite enveloping Foxlydiate and reduce the strategic gap to Bromsgrove more than Reduced Area 11, and promote coalescence with Tardebigge. -2 score for Reduced Area 11 is more relevant for the entire Area 11, but E2 score for Reduced Area 11 should be adjusted in line with other similar comparisons, such as Reduced Area 4, where a -1 score is appropriate.</p>	The HGDS explains the context to this scoring. Area 8 has not been identified as a preferred location for development. Storage Lane is a strong enough boundary in Green Belt terms but the extent of development would be more than is required before it reaches Storage Lane. The HGDS has identified that there is a lack of strong defensible boundaries south of Storage Lane. Furthermore, development at Bordesley would have a greater impact with respect to 'strategic gap' reduction to the conurbation than development elsewhere. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.
Area 8 has -2 score for SA objective E3, because the area will not form a logical extension to the existing settlement and potentially block/end the green corridor of the River Arrow valley. Potential for 'logical' extensions to Redditch will always be questionable but no more the case for Area 8 than any other site. Parts to the East of the	The HGDS explains why Area 8 is considered to have poor connectivity to the built form of Redditch. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.

Sub Issues	Officer response
<p>North-South brook across Area 8 could be removed from Area 8 to prevent blocking the valley. Developer proposals to the West do not go across the brook. A reduced Area 8 could have been proposed to mitigate this concern. The score against E3 should be adjusted to -1 instead of the current -2.</p>	
<p>Score for E1 objective recorded as a single minus, but in the results table, it is scored as -2; the red shaded entry on the corrected table includes the correct figure of -1. (Reduced area 11)</p>	<p>Noted this is an error in the SA and the Reduced Area 11 summary table on page 73 should have scored -1.</p> <p>However, the error in Table 4, p.73 has no consequential effects for the commentary at 4.313 (Conclusion of Broad Area Appraisal). The Scenario Appraisal (Areas 4R, 5, 6 & 11R) (Chapter 5) has no consequential effects for the commentary as a result of the scoring error in Table 4. Furthermore, the Scenario scoring in Table 5, p.92 actually reflects the correct score of -1 (i.e: -1, -2, -1, -1 = -1.25 average).</p>
<p>For Reduced Area 11 the score for E3 SA objective is -2, despite the fact that the Reduced Area 11 does not infer coalescence with Rowney Green or Alvechurch. Developer proposals are very selective in that they remain contained to the West of the River Arrow and do not extend North beyond Bordesley. If Officers recognised this area as a potential site against the master plans that the developer submitted, then objective E3 could be scored as -1 worst case, to zero, best case.</p>	<p>The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>A sustainability appraisal for the combination of the 3 most sustainable sites - Areas 6, 8 and reduced area 11 should be carried out. The existing appraisal for Areas 6 and 8 combined will be revisited, taking into account the corrected scoring factors in the table above, as well as the impact of Area 11.</p>	<p>Appraisal of each site is sufficient. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are not appropriate.</p>
<p>S2 Health Provision, Area 8 distance to Alexandra Hospital is mentioned. Area 4 no mention of the Hospital.</p>	<p>These are considered within the HGDS.</p>
<p>S3 No mention of the Sainsbury complex within 2km of Area 8. Whilst for Area 4 both Webheath and Batchley 2.3.km away across the A448 are mentioned.</p>	<p>These are considered within the HGDS.</p>
<p>E3 Area 8 "This area, if developed, will not form a logical extension to</p>	<p>Agree, this is a conclusion in the HGDS</p>

Sub Issues	Officer response
the existing settlement” Area 4 “The area has the potential to connect with the existing urban form of Redditch at Webheath”	
We have considered the Sustainability Appraisal Report and 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: Evidence base – Severn Trent Report

Sub Issues	Officer response
The Severn Trent report on potential impact of developments made no assessment of surface water drainage. The report stated “...preference would be for development to be located in Bordesley, Brockhill and then Foxlydiat with the least preferable location being in Webheath due to the need to pump or incur a more expensive more sustainable gravity option”	The Severn Trent correspondence to the Councils is not a report as claimed by respondents. Surface water drainage on the sites will be assessed to inform and revise the publication versions of both plans.
Are these reports e.g. ‘STW Foul Water Sewage report (Paul Hurcombe – Dec 2012)’ not being read? Or are they being ignored?	The Severn Trent correspondence to the Councils is not a report as claimed by respondents and this correspondence was requested by the Councils for consideration.
Consult with STW to discuss a timed infrastructure plan and phasing	Noted, these discussions are ongoing
In our drainage overview document (19 Dec 2012) we summarised that sewerage impacts would be minimised if development were allocated to the north of the Arrow valley (closer to the trunk sewers) and development to the west of Redditch (i.e. Webheath/ Foxlydiat) could be problematic to accommodate due to the small size of the sewers. Concern that additional development locations have by-passed the Water Cycle Study process and the 2800 dwellings in Foxlydiat is expected to require extensive sewerage capacity improvements.	The Outline WCS was completed before the cross boundary locations were analysed so they would not be included. STWL are completing more work to understand the costs of solutions for a range of scenarios. Regardless of this, STWL have a duty to enable connection to water supply, and for disposal of waste water for treatment.
For Site 1 whilst it’s the developer’s responsibility to construct and pay for the pumping station and on-site drainage, maintenance and running the pumping station will transfer to Severn Trent. Pumping is	STWL have met with the Councils and it is understood that the maintenance is not a constraint to development

Sub Issues	Officer response
a less environmentally sustainable option due to on-going electricity requirements and associated carbon impacts.	
Sewer capacity improvements will be required to the existing small diameter sewerage system upstream of the Arrow valley (as indicated in the Water Cycle Study and the WYG report). Until more detailed hydraulic modelling is undertaken we are unable to confirm the extent of any capacity improvements required to ensure flood risk is not increased. Subject to resolving sewerage capacity issues, we do not expect there to be sewage treatment issues at Spernal sewage treatment works but the key concern is the ability of the sewerage system to accommodate the additional flows.	Noted however STWL are completing more work to understand the costs of solutions for a range of scenarios.
There is a potential option to drain the site south by gravity to a treatment works at Priest Bridge. This option will require a new 2km long gravity sewer to connect to the existing gravity sewer running along the Bow Brook valley, plus potential capacity improvements to the existing 7.2km sewer to Priest Bridge Sewage Treatment Works. As part of a developer enquiry relating to the Webheath ADR site we have notionally looked at this option but initial estimates indicate this will require approximately £2.5m of sewerage improvements and Priest Bridge Sewage Treatment Works will also require additional treatment capacity.	Noted, STWL are completing more work to understand the costs of solutions for a range of scenarios.

KEY ISSUE: Evidence base – Transport Study

Sub Issues	Officer response
Survey was carried out when schools were on holiday and during an off peak time.	This response has been sent to WCC for comment
Welcome the reference to impacts on surrounding highway network being examined and mitigated	Noted
WCC has provided evidence to HA to assess impact of proposals on the SRN and this is in early phases. This will highlight required mitigation and issues around funding which is a pre-requisite for the Plan (Due End July)	Noted
Development must contribute towards improvements to the A38	Noted

Sub Issues	Officer response
through WCC.	
The following sites are cheapest to develop (confirmed by WCC) - ascending in cost order – Griffon Studley, Mappleborough Green, Bordesley, Brockhill, Foxlydiat and Webheath.	This response has been sent to WCC for comment
Strongly object to the biased 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) and 2,800 (Foxlydiat).	This was submitted with the planning application and was not used as evidence to inform the HGDS.
After reading the 242 page consultation study the planners do not appear to have carried out sufficient traffic studies of what effect this will have on the local Bromsgrove community. What traffic studies been commissioned on local lanes?	Supporting information is contained in the background information – Transport Schemes.
The Bromsgrove District Infrastructure Delivery Plan March 2013 by Halcrow gives costs associated with Improving Bus Service Provision across Bromsgrove District and Redditch Borough. There does not appear to be any background detail to this information and this would be required in order to give an analysis of these figures.	Noted. This response has been sent to WCC for comment ACTION: Additional information to support the Study will be formally requested from WCC. Email has been sent to WCC for more background detail – awaiting response - LJ

KEY ISSUE: Evidence base – WYG2 Report

Sub Issues	Officer response
The White Young Green Report (WYG2) actually highlighted Bordesley as the preferred area for development. Why is WYG2 being ignored? The pros for this site certainly outweigh the cons.	WYG Second stage report was largely discredited by the WMRSS Panel report recommendations

KEY ISSUE: Evidence base – SHMA

Sub Issues	Officer response
Concerns about the independence of the population data. The report	The SHMA was carried out by planning consultants who have

Sub Issues	Officer response
<p>on which housing need has been assessed appears to have been submitted by a property consultancy who could potentially have vested interests. Taking these factors into account I am concerned about the validity of the policy produced to deliver these developments.</p>	<p>specialist experience in producing this type of assessment and no vested interests. The data has been extracted from ONS projections which is a standard methodology used Nationally.</p>
<p>It is considered that, with a reconsideration of:</p> <ul style="list-style-type: none"> - the excluded SHLAA sites; - proposed housing densities; - the employment sites portfolio; and - the imminent office to residential permitted development changes, <p>it will not be necessary to provide the level of housing currently being proposed for areas outside of Redditch.</p>	<p>This has been undertaken through annual updates to the Redditch SHMA and ELR. Densities proposed on SHLAA sites reflect the local character of Redditch and make the most efficient use of the land. The PD rights permitting change of use from office to residential is unlikely to yield significant levels of residential development.</p>
<p>Given that there is evidence of migration from both Birmingham and the Black Country into Bromsgrove, two key issues need to be addressed under the Duty to Cooperate as the plan emerges.</p>	<p>Noted this is being considered by the Councils.</p>
<p>Policy 4 sets out a locally derived requirement for 6,380 dwellings between 2011 and 2030, equivalent to 336 dwellings per annum. This is arbitrarily low compared to the economic growth-based requirement of 8,620 dwellings identified by the February 2012 SHMA. It has not been aligned to any economic growth projections. It is therefore unlikely to reflect true housing needs. Housing requirements must be set in accordance with paragraphs 158, 159, 152 and 14 of the NPPF</p>	<p>Disagree, the level of growth proposed meets objectively assessed housing requirements. 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>
<p>ONS recently issued interim-2011 based household projections. These should be used with some caution, as they are interim and likely to have been influenced by short term issues affecting the housing market and economy. When these issues ease household formation rates are likely to return to a pre-recession trajectory over the longer term. The projections only cover the period 2011-2021 and are unlikely to reflect predicted requirements across the whole plan</p>	<p>Noted, the 2011 based projections came in advance of the 2012 SHMA projections.</p>

Sub Issues	Officer response
period.	
In relation to the housing backlog, Many authorities have consistently under-provided housing against targets in the adopted RSS. These were subject to significant scrutiny and were found to be based on robust evidence. If the LPA has not provided sufficient homes to meet its RSS target, there is a need to ensure requirement in the forthcoming Plan includes an element to address this 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. Council's evidence indicates that this backlog is not factored into proposed housing requirement. Unmet need will not just disappear. Failure to include past shortfall in housing delivery is unsound. Shortfall should be made up within the first 5 years of the plan.	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.
The preferred overall housing requirement is likely to significantly constrain the scope for addressing affordable housing needs in the area.	The Redditch housing requirement has been determined to meet objectively assessed housing need and it is accepted that it will not be possible to meet all demands for affordable housing.
This approach will put the authority back in control of planning in their area and will give the Members comfort and certainty over the level and location of development that will take place over the lifetime of the Plan.	Noted

KEY ISSUE: Evidence base – Historic Environment Assessments

Sub Issues	Officer response
HEA should be referred to when assessing the potential growth areas All the potential Growth Areas in Worcestershire have high sensitivity to change. Some already contain known and nationally important heritage assets. All areas have a high potential for containing previously unrecorded remains.	The HEA was considered when preparing the reports. It is agreed that all these areas are highly sensitive to change
Initial opinions is that the most sensitive areas are 1, 2, 4, 5, western half of 11	Agreed, but would include 3, 9 and 10
Least Sensitive areas 3, 4, 6 and 8, eastern half of 11	Would disagree in respect of 3 and 8, 4?
Area 1 is covered by 2 Historic Environment Character Zones HECZ141 (Astwood Hill and Ham Green) and HECZ142 (Astwood	Agreed, although there are 5 listed buildings

Sub Issues	Officer response
Farm and Dagtail End). There is 1 SAM and 4 Listed Buildings. The western 2/3 of area falls within eastern part HECZ141 and contains the Scheduled remains of Hunt House Moat. This site also includes a grade II listed building, making this area highly sensitive to change. The setting of the monument and listed buildings should be a key consideration in assessing the suitability of Area 1 for growth.	
Area 2 is covered by 2 Historic Environment Character Zones HECZ 141: Astwood Hill and Ham Green and HECZ 146: Callow Hill to Cruise Hill. There are 13 listed buildings. The Scheduled remains of Hunt End abut the NE corner of this growth area and therefore would impact on the SAM and listed buildings setting.	Comments noted, although there are 12 listed buildings
Area 3 is covered by 2 Historic Environment Character Zones HECZ 146: Callow Hill to Cruise Hill and HECZ 147: Upper Bentley. There are 5 listed buildings.	Comments noted and agreed
Area 4 is covered by 1 Historic Environment Character Zones HECZ 147: Upper Bentley. There is 1 listed building. The northwest corner of growth Area 4 abuts the Conservation Area of Hewell Grange.	Comments noted and agreed
Area 5 is covered by 1 Historic Environment Character Zones HECZ 148: Hewell Grange, Bordesley and Alvechurch Parks. There are 5 listed buildings, 1 conservation area and 1 registered park and garden. The north western area of Growth Area 5 lies within the Hewell Grange conservation area and Registered Garden. The listed buildings are all within a cluster at Hewell Grange.	Comments noted, although there are 17 listed buildings within the Area
Area 6 is covered by 1 Historic Environment Character Zones HECZ 148: Hewell Grange, Bordesley and Alvechurch Parks. There are no designated assets.	Comments noted and agreed
Area 8 is covered by 1 Historic Environment Character Zones HECZ 148: Hewell Grange, Bordesley and Alvechurch Parks. There are 6 listed buildings.	Comments noted although there 7 listed buildings within the area
Area 9 is covered by 2 Historic Environment Character Zones HECZ: 133: Holt End to Weatheroak Hill and HECZ 165: The Heaths. There are 12 listed buildings and 1 conservation area. The southern edge of Area 9 contains Holt End Conservation Area, while the south	Comments noted, although the conservation area is known as the Beoley Conservation Area

Sub Issues	Officer response
western corner overlooks the Scheduled remains of Beoley Mount.	
Area 10 is covered by 2 Historic Environment Character Zones HECZ: 133: Holt End to Weatheroak Hill and HECZ 165: The Heaths. The northern edge of Area 10 contains Holt End Conservation Area, while the far western corner contains the Scheduled remains of Beoley Mount.	Comments noted and agreed
Area 11 is covered by 1 Historic Environment Character Zones HECZ 148: Hewell Grange, Bordesley and Alvechurch Parks. There are 5 listed buildings and 1 conservation area. The Worcester and Birmingham Canal Conservation Area transects Growth Area 11 and the south western side abuts the Hewell Grange Conservation area.	Comments noted and agreed

KEY ISSUE: Evidence base – NPPF

Sub Issues	Officer response
NPPF states there should be 'Consent of local communities' in these decisions. I am yet to meet anyone who lives in the proposed development area who has given their consent (or even a reluctant acceptance) to this proposal.	This is not contained within the NPPF
Although on first viewing the Councils cross boundary policy appears to be very acceptable I believe that the NPPF on which it is based is a flawed document. I believe that the National Planning Policy Framework, that came into effect last year, is too vague and unspecific in its aims and objectives and can too easily be manipulated to suit the whim of the local authority.	It is not for the HGDS to question the NPPF, respondent should take this up with DCLG directly.
The NPPF requires 5 years worth of housing land. 2030 is 17 years away. What is the urgency with allocating Foxlydiate?	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

Sub Issues	Officer response
	dwellings by 2030, this is the overall need up to the end of the Plan period.

KEY ISSUE: Evidence base – Joint Climate Change Strategy and Action Plan

Sub Issues	Officer response
<p>Joint Climate Change Strategy and Action Plan produced by Bromsgrove District and Redditch Borough Councils (2010-2013) points out the following:</p> <ul style="list-style-type: none"> • The central estimate of change in winter mean precipitation is 18%; it is very unlikely to be less than 3% and is very unlikely to be more than 39%. By 2020, on average, there will be 6% more winter precipitation than we are used to. • In Bromsgrove and Redditch, the most significant problems will be more serious water stress and overheating. Rainfall is projected to decrease during the summer and increase during the winter months, with an increased risk of more intense events which will increase the risk of fluvial and surface water flooding and parts of the drainage system is prone to being over-whelmed during heavy rainfall. <p>However, recent events have suggested that both summers and winters may have more rainfall in future. It is expected that the flow of water into Bow Brook will increase without the additional risk caused by these proposed developments.</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.</p> <p>A flood risk assessment of the site will determine how this can be achieved for this site.</p>

KEY ISSUE: Evidence Base – 2010 Joint Consultation

Sub Issues	Officer response
<p>The development of Bentley Green Belt is in direct contradiction to your previously stated policies, strategies & objectives.</p>	<p>The Joint consultation in 2010 did include a wide swathe of potential development areas across north and west Redditch, including parts of Area 4.</p>

