

Redditch Borough Council Planning Policy comments on the Foxlydiate Site Hybrid Planning Application (16/0263)

1. Background

1.1 Bromsgrove District Council (BDC) have received a Planning Application for the Foxlydiate development site (Application number 16/0263). The Hybrid Application is to establish the principle for up to 2,560 dwellings, a Local centre including retail floorspace (up to 900 sq metres), health and community facilities (of up to 900 sq metres), a 3 Form Entry first school (up to 2.8Ha site area) (including associated playing area and parking) and all associated enabling and ancillary works AND detailed aspects of the planning application for the creation of a means of access off Birchfield Road, Cur Lane, Foxlydiate Lane and Pumphouse Lane.

1.2 In addition Redditch Borough Council (RBC) has received a Planning Application for a small part of the site and the means of access which are located within the Redditch administrative area (Application number 2016/077/OUT).

1.3 This response has been prepared as RBC is as a consultee to the Hybrid Planning Application hosted by BDC. The purpose of these comments is not to consider the merits of the Redditch portion of the application (other than the role it plays forming part of the wider masterplan area) or provide a determination of that application. It is to provide BDC with a view from RBC on the Hybrid Application being determined by them.

2. The Site

2.1 The application site is mostly located within Bromsgrove District, with a small portion of development and highways access located in Redditch Borough. The development is intended to serve the development needs of Redditch (which is discussed further below).

2.2 The site is located to the west of Redditch Town, adjacent to the Webheath area. It is bounded by residential development at Webheath to the east, the A448 (Bromsgrove Highway) to the North and Bromsgrove Green Belt to the west and south. It is located in the Tardebigge Ward of Bromsgrove and within the Bentley Pauncefoot Parish Council area.

2.3 The Site is an allocated housing site in the Bromsgrove District Plan 2011- 2030 (Adopted 2017).

3. National Planning Policy

3.1 The revised National Planning Policy Framework (NPPF) which was published in 2018 has a number of new polices which must be considered in relation to this planning application. One key message that came out of the new NPPF is that strategic policies should be informed by a local housing need assessment, conducted using the standard methodology.

Central government are seeking to maintain their aspiration of 300,000 dwellings per annum being built. The standard methodology for assessing housing need, which was released in July 2018, is currently under review with proposed changes and clarifications out for consultation. In the long term the formula for the standard methodology will be reviewed and a new methodology expected by the time the next projections are issued.

3.2 It is important to highlight that the results of this standard methodology are a starting point in determining the appropriate housing need for any given area and should trigger further discussions in determining the most appropriate housing figure for that area. In addition, any housing needs that cannot be met within any neighbouring areas should also be taken into account when establishing the amount of housing to be planned for. With regard to the standard methodology, the final implications of using this methodology for Redditch are currently unknown and therefore unable to be effectively planned for. Notwithstanding this any change in minimum housing number is required to be established through the Development Plan.

3.3 With regard to affordable housing, the revised NPPF has lowered the threshold to which this should be applied. Affordable housing is now triggered by 10 units or more (previously 11) or 0.5 hectares (previously 1,000 sqm). It is accepted that this Planning Application does provide its allocation of affordable housing, but worth mentioning the importance placed on the delivery of affordable housing by national policy.

3.4 The NPPF has a new section focused on making effective use of land. This purpose of this section is to ensure that effective use of land is achieved in meeting the need for homes and other uses while safeguarding and improving the environment and ensuring safe and healthy living conditions. The application site is large and therefore has enormous potential to ensure its design is in keeping with this requirements of section 11 in particular paragraph 118 b), to recognise that undeveloped land can perform many ecological functions.

4. Local Planning Policy

4.1 The Foxlydiat site is currently designated within the Bromsgrove Local Plan (2011 – 2030) as a housing allocation to meet some of the development needs of Redditch Borough. The Bromsgrove District Plan (BDP) was adopted in January 2017; at this point the Foxlydiat site was removed from the Green Belt and became an allocation for housing development. Policy RCBD1 ‘Redditch Cross Boundary Development’ allocates the site for up to 2,800 dwellings, a Local Centre, a First School and associated community infrastructure.

4.2 Policy RCBD1 is included in the BDP and as an appendix to the Borough of Redditch Local Plan No.4 2011- 2030 (BORLP4) and states that Redditch needs to deliver 6,400 up to 2030 is. Around 3,000 dwellings are to be accommodated within Redditch Borough and therefore

approximately 3,400 dwellings are to be accommodated at the Foxlydiate site and as an extension to the existing Brockhill site. Both sites are crucial to enable the delivery of the housing strategy for Redditch over the plan period.

4.3 It is essential that the proposed development is in accordance with all of the Policies contained within the BDP, in particular Policy RCBD1 which details the principles that the site must achieve to be sustainable. This policy was jointly prepared with RBC. The overarching proposal within the Planning Application is in line with the requirements of the policy with regard to development type and quantum. The remaining principles will be considered below.

4.4 It is worth noting at this point that it has been determined that BORLP4 and RCBD1 are fully in accordance with the policies set out in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). Therefore for the purpose of these comments is to consider the proposed scheme against the principles in Policy RCBD1 to form RBC's view on the Application.

5. Housing

5.1 As stated above, the quantum of housing proposed is in accordance with Policy RCBD1 and its delivery forms an essential part of the Redditch housing strategy and the Borough's five year land supply. It is anticipated that the Foxlydiate site will be delivered over the entire plan period, with completions anticipated within the five year housing land supply for Redditch.

5.2 The Applicant has submitted an Affordable Housing Delivery Plan alongside the application which states that 40% affordable housing will be provided, which consists of a mix of house types and tenures (paragraph 5.1 and 5.2). This is in accordance with the requirements of the policy. The Delivery Plan also states that the affordable housing provided is intended to meet the Bromsgrove affordable housing need, Officers would suggest this is an error as the housing is intended to meet Redditch's needs and therefore the affordable housing must also meet Redditch requirements.

6. Transport

6.1 Redditch Borough Council would like to stress at this stage that it will only be supportive of the development being granted permission if all appropriate mitigation measures have been fully outlined and accounted for. The impact of the development site on the wider area should have been considered cumulatively alongside all other development sites in the vicinity. It is considered this can only be fully known and achieved through a full transport assessment. As stated in Policy RCDB1 *"An overall Transport Assessment will be produced taking account of the prevailing traffic conditions and the individual and cumulative effects of development on transport infrastructure. This will define the mitigation necessary to protect the safety and operation of the road network."*

6.3 With regard to walking and cycling the Applicant has submitted a Walking and Cycling Strategy to support the application. Policy RCBD1 seeks to ensure that full use of existing walking and cycling routes are achieved and that walking and cycling routes are well integrated with the Green Infrastructure Network. Chapter 5 of the Walking and Cycling Strategy provides detail on the infrastructure improvements that will be completed by the developer to ensure there are walking and cycling links within the site and from the site to key destinations are provided and where appropriate enhanced.

7. Green Infrastructure and Topography

7.1 Policy RCBD1 (Criterion V.) requires an *“Overall Strategy and Management Plan for Green Infrastructure which maximises opportunities for biodiversity and recreation”* amongst other things. Policy RCBD1 also requires green corridors to be created around Spring Brook and for the site to be sensitively designed to integrate with the surrounding existing environment and landscape. It appears the Applicant has sought to achieve this through the proposals however Natural England will be best placed to consider if maximum opportunities have been sought.

7.2 It is a key requirement of Policy RCBD1 (Criterion V.) to ensure that development is respectful and sympathetic to the topography of the site, with no development on prominent ridge lines. From the submitted Masterplans it appears the design of the scheme is generally in accordance with these principles; however RBC would question whether development along the northern elevation of the site along the A448 is the appropriate location for three storey buildings with a 12 metre ridge height.

8. Flood Risk, water and sewerage

8.1 Policy RCBD1 emphasises the importance of the development site improving the local water environment. The Environment Agency and the North Worcestershire Land Drainage Team are better placed to determine if the proposed development safeguards and enhances the local water environment with regard to flooding, floodplain regime, management of surface water, water efficiency and water pollution risk.

8.2 It is understood that Severn Trent water, the Environment Agency and the North Worcestershire Land Drainage Team have worked with the developer in order to provide solutions to sewerage capacity and wastewater collection and treatment.

9. Design

9.1 The development must be of a high quality design and reflect the surrounding character of the area. At this stage it is considered that the scheme has considered the surrounding context by including a large proportion of open space throughout the site. It is appreciated that as the application is Hybrid in nature and detailed aspects of design will be dealt with through the Reserved Matters Applications. However, RBC would like to emphasise at this

point the importance placed on Criterion XII of Policy RCBD1 when formulating the detailed design proposals of the scheme. This development will be an extension of Redditch and should be designed to seamlessly flow from the existing urban area of Redditch, into the Foxlydiate site, and then into the rural countryside beyond. The Foxlydiate site has a large quantum of development which includes a number of uses, making good design easier to achieve, this opportunity should be realised in order to provide a well-designed, desirable community.

9.2 There are two heritage assets in close proximity to the Foxlydiate site (one within it), they are Hewell Grange Registered Park and Garden and Lanehouse Farm. It is also acknowledged that the Applicant has implemented the advice given by Bromsgrove District Council with regard to placing development to ensure these heritage assets are respected. Historic England and the Borough Councils Conservation Officer are best placed to determine if they feel the development has been sympathetically designed.

10. Conclusion

10.1 The principle of this application is in accordance with both the BDP and BORLP4. For clarity this site is not within the Green Belt and forms the basis of a detailed masterplan to deliver the Foxlydiate development site in accordance with Policy RCBD1 'Redditch Cross Boundary Development'. The site contributes a fundamental part of the housing need for Redditch up to 2030. The delivery of this site ensures a continued supply of much needed housing for Redditch, including a continued contribution of affordable housing. This site is part of the five-year housing land supply. It is fundamental that the Application is in accordance with all of the policies set out within the BDP, and continues to be through to the detailed Reserved Matters applications. RBC is supportive of all other policies contained within the BDP and would wish to see them implemented to a high standard. In conclusion, Redditch Borough Council supports the principle of the planning application for the above mentioned development.