Redditch Borough Council Planning Policy comments on Land At Barn House Farm Foxlydiate Lane Planning Application (17/00469/OUT)

1. Background

- 1.1 Bromsgrove District Council (BDC) have received a Planning Application for Land at Barn House Farm, which forms a small parcel of the much larger Foxlydiate development site (Bromsgrove Planning Application No. 16/0263). This Planning Application is to establish the principle for 68 dwellings, to include car parking, open space provision and associated infrastructure (following demolition of all existing buildings) with details of the means of access to the site from Foxlydiate Lane submitted for consideration at this stage, with all other matters (including internal circulation routes) reserved.
- 1.2 This response has been prepared as RBC is as a consultee to the Planning Application hosted by BDC. The purpose of these comments is to provide Bromsgrove District Council with a view from Redditch Borough Council on the Application being determined by them.

2. The Site

- 2.1 The application site is located within Bromsgrove District. 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. The site is located within the larger Foxlyidate site, currently subject of another Planning Application.
- 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.

^{1 |} Redditch Borough Council Planning Policy comments on Land at Barn House Farm Planning Application (17/00469/OUT) (November 2018)

- 3.2 It is important to highlight that the results of this methodology are a starting point for determining the appropriate housing need for any given area and should trigger discussions in determining the appropriate housing figure for that area. In addition, any housing needs that cannot be met within neighbouring areas should also be taken into account in 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 application does provide its allocation of affordable housing, but worth mentioning the importance placed on the delivery of affordable housing by national policy.

4. Local Planning Policy

- 4.1 This 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 Foxlydiate site was removed from the Green Belt and became an allocation for housing development. Policy RCBD1 'Redditch Cross Boundary Development' allocates the wider site (of which this site is part) 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 as the evidence supporting the Borough of Redditch Local Plan No.4 2011- 2030 (BORLP4) and states that Redditch needs to deliver up to 2030 is 6,400. 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 the 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. 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 RBCs view on the Application.

5. Housing

- 5.1 As stated above the quantum of housing is in accordance with the Policy and its delivery forms an essential part of the Redditch housing strategy and the Boroughs 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 stated that 40% affordable housing will be provided, which is in accordance with the requirements of the policy. Policy RCBD1 makes reference to a mix of house types and sizes. Whilst this is only an outline application, it is noted that the proposed indicative layout shows only 3 and 4 bedroomed properties for private sale. A mix which included a proportion of smaller 2 bedroomed properties would be preferable; including some bungalows with small gardens (to avoid land-hungry plots) would be suggested.

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 transport mitigation measures have been full outlined and accounted for and the impact on the development site has 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 impact 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."
- 6.2 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. Whilst this application is a separate application to the wider Foxlydiate Site, it is still essential that pedestrian connectivity to the wider strategic site should be fully addressed.

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. The policy also requires green corridors to be created and for the site to be sensitively designed to integrate with the surrounding existing environment and landscape. Natural England will be best placed to consider if maximum opportunities have been sought.

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 the 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.

9. Design

9.1 The development must be of a high quality design and reflect the surrounding character of the area. 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 site, through the wider Foxlydiate site and then into the rural countryside beyond.

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 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.