

**REDDITCH BOROUGH COUNCIL**  
**APPENDIX A**

**PLANNING  
COMMITTEE**

17th July 2019

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**Planning Application 19/00134/FUL**

**Provision of 14 no. self-contained supported one bedroom flats and resource hub (Use Class C2) and 13 no. 2 bedroom flats (Use Class C3) with associated external works, car parking and landscaping.**

**Land At Junction Of Ipsley Street, Station Way And Evesham Street, Redditch, Worcestershire, B98 7AJ**

**Applicant: Josie Bishton**  
**Ward: Central Ward**

**(see additional papers for site plan)**

The author of this report is Sharron Williams, Planning Officer (DM), who can be contacted on Tel: 01527 534061 Ext 3372 Email: sharron.williams@bromsgroveandredditch.gov.uk for more information.

**Site Description**

The application site is the former Liberal Club site which is a triangular area of land bounded by Ipsley Street, Station Way and Evesham Street. The former Liberal Club building has been demolished some time ago and the site has a rough surface and is currently being used as a car park. A number of trees exist on the site with many of them located close to the perimeter of the site.

The site is within an area designated as the Town Centre in the Borough of Redditch Local Plan No.4.

**Proposal Description**

Permission is sought to redevelop the site and provide 13 No. 2 bed shared ownership apartments, a 'My Place' facility comprising 14 No. 1 bed supported living flats for local people with long term needs, and a resource/support facilities flat would be provided for 'My Place' staff to assist residents.

9 No. 2 bed apartments would be within a V shaped 3 storey brick/render building located on the southern tip of the site, whilst the 'My Place' facility would be provided close to the northern boundary adjacent to Station Way. Two separate blocks of flats would provide a total of 4 No. 2 bed apartments and front Ipsley Street. These flats along with the 'My Place' facility would be two storeys in height.

The buildings would include a traditional pitched roof with render and brickwork for the walls. The design is simplified; however, later revisions submitted have provided some vertical attenuation.

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Communal car parking facilities will be provided with footpath links between each building. Access to the car parking would be via Ipsley Street and Evesham Street.

**Relevant Policies :**

**Borough of Redditch Local Plan No. 4**

- Policy 1 Presumption in favour of Sustainable Development
- Policy 2: Settlement Hierarchy
- Policy 4: Housing Provision
- Policy 5: Effective and Efficient use of Land
- Policy 6: Affordable Housing
- Policy 17: Flood Risk Management
- Policy 19: Sustainable travel and Accessibility
- Policy 20: Transport Requirements for New Development
- Policy 22: Road Hierarchy
- Policy 30: Town Centre and Retail Hierarchy
- Policy 31: Regeneration for Town Centre
- Policy 36: Historic Environment
- Policy 37: Historic Buildings and Structures
- Policy 39: Built Environment
- Policy 40: High Quality Design and Safer Communities

**Others**

- NPPF National Planning Policy Framework (2019)
- NPPG National Planning Practice Guidance
- Redditch High Quality Design SPD
- SPD Affordable Housing Provision
- SPD Open Space Provision
- Redditch Town Centre Strategy
- Worcestershire Waste Core Strategy

**Relevant Planning History**

1997/221/FUL	Alterations And Conversion To Form Bedsits On First Floor And Staff Accommodation On Second Floor	08.08.1997
1993/255/FUL	Creation Of New Gateway	16.08.1993
1992/137/FUL	Alterations And Conversion To Form 9 Bedsits On The First Floor And Staff Accommodation On The Second Floor	22.06.1992

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**Consultations**

**Highways**

Have no objection to the scheme subject to conditions and financial obligations.

**Worcestershire Archive and Archaeological Service**

The above application site lies on the boundary between the former Ipsley parish and Tardebigge parish, and at the junction of two historic routeways. As such, the site is likely to have contained former settlement dating from the Medieval period onwards, with low potential for pre-Medieval settlement. Modern development may have impacted significantly on any below ground remains, but it is still likely that there would be islands of survival within the development area.

On this basis, it is recommended that a programme of archaeological works should be secured and implemented by means of a suitably worded condition attached to any grant of planning permission.

**Education Department At Worcestershire- Alison Barnes**

The proposal as submitted is situated in the catchment area of St Georges CE First School, Woodfield Middle School and The Trinity High and Sixth Form Centre. St Bede's CE Middle School is also located less than 1 mile from the proposed development.

The proposal as submitted is for a development of one and two bedroom assisted living accommodation. It is envisaged that this type of development is likely to yield low pupil numbers and will have a low impact on education infrastructure in the area. On conclusion, a contribution towards education infrastructure will not be sought as schools in the area have some surplus capacity to admit the low pupil numbers that may be generated from this development.

**WRS - Contaminated Land**

The site has been previously used as a car park which is considered a potentially contaminative use. Furthermore, the site is located very close to the buffer zone of a sand and gravel pit. Whilst the site falls just outside the buffer zone, it is considered close enough to warrant consideration with regards to ground gas given the scale of the proposed development. Whilst some site investigation has been undertaken, it is considered that further site investigation is required given that circa 27 dwellings are proposed and that suspect asbestos contamination has been reported but not quantified. Similarly, whilst some ground gas monitoring has been undertaken, further gas monitoring is required in line with current UK guidance. As such a suitable condition is recommended.

**Arboricultural Officer**

No objections to this proposed application, in relation to any tree related issues, subject to suitable conditions.

**Crime Risk Manager**

No objections or comments regarding this application.

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### **Town Centre Co-ordinator**

No objections.

### **Leisure Services Manager**

No objections to the development. However, an off-site contribution would be appropriate given the increase in residential accommodation in the Town Centre.

### **Housing Strategy**

Happy with this proposal and feel that the layout makes good use of the site and meets the need for affordable housing in a sustainable location.

### **Waste Management**

Domestic and recycling waste bins are required and need to be paid for by the developer. Entrance to the bin store areas appear to be acceptable from our point of view.

### **North Worcestershire Water Management**

The proposed development would be located within flood zone 1 and is located within the Park Brook catchment. Based on the EA's surface water flood mapping there is no pooling of surface water on the site. A drainage plan has been provided with the application, however, a drainage condition is recommended.

### **Node URBAN DESIGN Katie Kershaw**

Overall, consider regeneration of the site will have, broadly, a positive impact on the area. Recommend some revisions to the initial scheme to

- Reintroduce a sense of enclosure to the street through re-orientation of the built form, avoiding the over dominance of car parking.
- Achieve a more contextual design through considering a townhouse rather than apartment aesthetic, introducing a higher degree of articulation, detailing, and depth to the façade.
- Reconsider the relationship between hard and soft landscaping, and how positioning of these areas relate to the street.
- Reconsider pedestrian access to the west of the site, and considering a more holistic set of pedestrian walkways to take account of access points, potentially as part of the landscaping scheme, to enhance the north-south movement and complement the east west movement around the site.

### **NHS/Medical Infrastructure Consultations**

No Comments Received To Date

### **NHS Acute Hospitals Worcestershire**

The existing service infrastructure for acute and planned health care is unable to meet the additional demand generated as a result of the proposed development of flats. A contribution is requested for the relevant landowner or developer to contribute towards the cost of health care provision directly related to the development proposals and is fairly and reasonably related in scale and kind.

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**Conservation Officer**

The flats will be constructed in a mix of red brick and colour through render beneath pitched grey concrete tiled roofs.

To the south of the site is the locally listed Black Horse Public House building, although it would not appear to be in use as a pub. It comprises several buildings, possibly originally cottages combined into one use, dating back in part to the 18th century, although there is apparently evidence of timber framing inside.

The applicant has submitted a very detailed Heritage Statement which examines the archaeological and historic development of the area, and the damage caused to the area following the 1980s redevelopment of the centre of Redditch.

Policy 36.2 of the Redditch Local Plan No.4 requires, non-designated heritage assets and their settings to be conserved and enhanced in a manner appropriate to their significance and contribution to the historic environment. While paragraph 192 of the NPPF requires local authorities to take account of 'the desirability of new development making a positive contribution to local character and distinctiveness.

The redevelopment of this site is welcomed, as it is clearly an eyesore and detracts from the setting of the locally listed building. The proposed scheme in terms of local character and therefore the setting of the locally listed building is disappointing. The architecture is generic and can be found anywhere, and has none of the character or detailing of the surrounding buildings 19th century buildings where red brick predominates.

**Worcestershire Wildlife Trust**

Do not object to the proposed development but recommend ecological conditions.

**NHS Mark Fenton Associate Director, Estates & Facilities Man**

No Comments Received To Date

**Public Consultation Response**

1 letter of comment referring to supporting documents submitted and use of S106 contributions to be used in local areas.

**Assessment of Proposal**

Principle of development

The site falls within an area designated as the Town Centre in the Borough of Redditch Local Plan No. 4. Policy 31 would be applicable to this site and encourages the increase of residential accommodation in the Town Centre.

The site itself is mainly within a mixed use area comprising residential/offices/ shops etc. it is considered that the principle of residential use on the site is considered to be acceptable and would not conflict with the current neighbouring uses/activities close to site.

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**Density of Development**

The site is approximately 0.3 hectares in area with 27 units of accommodation proposed (excluding the resource/admin flat); representing a density of approx. 90dph.

The 2019 National Planning Policy Framework (NPPF) requires local planning authorities and developers to make effective use of previously-developed land, especially if this would help to meet identified needs for housing where land supply is constrained. Section 11 of the Framework emphasises the importance of making effective use of land, and with respect to density, Para 123 comments that "Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site." The paragraph also states that local planning authorities should refuse applications which they consider fail to make efficient use of land.

Policy 5 of Local Plan No.4 (Effective and efficient use of land) encourages densities of 70 dwellings per hectare within the Town Centre and District Centres. It then goes on to say that higher densities will be sought in locations close to public transport interchanges.

Taking into account that the site is within the Town Centre and is adjacent to public transport routes as well as the bus and railway station, it is considered that a higher density scheme would be appropriate and acceptable in this location, and as such the proposal complies with Policy 5 of Local Plan No.4 and the NPPF.

**Scale**

The scales of the buildings are generally 2 storeys and 3 storeys for the V shaped apartment block. The positioning of the V shaped building on the southern tip of the site offers something of a landmark building to ground the scheme in the area and complements the scale of the Victorian terraced properties close by.

**Layout and appearance**

Since the submission of the initial plans for the scheme and following on from comments submitted by the Urban Designer and Conservation Advisor, amendments have been made to the scheme resulting in a scheme that now respects the historic context of the surrounding buildings.

Amendments to the scheme include:-

- Alteration to the layout of the boundary treatment to the west of the 'My Place' with the addition of railings to the frontage to the northern end of Evesham Street.
- Change of 1.8m close boarded fence to 1.5m fence with 300mm trellis around the sides and rear of the 'My Place', to create a more permeable and attractive boundary treatment under the trees.
- Improvements to footpath links within the site.
- Alterations to the design of the front elevation of the 'My Place' building:- Reducing the extent of the render and creation of two smaller secondary gable features, to provide a more vertical emphasis as well as an introduction of half rendering to the end gables

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- In respect to the V shaped apartment block: - There has been an introduction of deeper windows to the bedrooms, creating a modern interpretation of the Victorian window proportions. Re-design of the gable features to create a narrower gable and introduce a vertical emphasis with less render contained between a projecting brick cheek detail. Incorporation of additional gable features to both sides, again contained by the brick cheek detail, providing a reference to the double gables on a number of the older buildings that surround the site. Lowering of the eaves to the wing blocks, to emphasise the corner. Hipped end to the wing blocks, to reduce the scale of these ends of the building.
- 2 storey Apartments: - Introduction of the deeper windows to the bedrooms, again creating a modern interpretation of the Victorian window proportions. Re-design to the gable features to create a narrower gable with a vertical emphasis with less render which is contained between a projecting brick cheek detail.
- Materials, a Blue Black Fibre Cement Slate is now proposed in place of the original grey concrete tiles, in order to blend the scheme in with surrounding properties.
- The Landscape Concept Plan has also been updated and shows the planting strategy, the location of the new hedges behind the metal railings at back of pavement and the bulb planting under the existing trees, which will provide some seasonal colour and interest both in the public domain to the Ipsley Street and Evesham Street frontages as well as the private amenity space for the resident of the My Pace building.

The revisions made to the scheme go some way to address concerns initially raised by the Conservation Advisor and the Urban Designer. Officers consider the revisions to the scheme as acceptable and would be in accordance with the aspirations of the Councils SPD in terms of High Quality Design.

**Highway matters**

Policy 19 of the Local Plan No. 4 (Sustainable Travel and Accessibility) focuses on the need to reduce private car use and increase the use of public transport. The County's 'Streetscape Design Guide' states that "for both residential and commercial developments in town and city centres the applicant may choose not to provide car parking spaces at all. Consideration must be given to the opportunity to access the site sustainably, the availability and capacity of public car parks, existing parking restrictions, the number of linked trips and the implementation of an approved Travel Plan or welcome pack."

24 car parking spaces are shown on the plans and this is less than what is required for the scale of the development. However, supporting details submitted by the applicant clarifies that residents using the 'My Place' will not generally have a car although some provision will be available for visitors etc. A reduction in car parking is proposed with the 2 bedroom apartments having 1 car space per unit. Taking into consideration that the site is in the Town Centre with good public transport links and compelling arguments put forward by the agent, the reduction in car parking provision is acceptable in this location. County Highways consider the scheme to be acceptable and recommend conditions.

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**Landscaping**

The scheme proposes to retain as much of the existing boundary tree planting although some trees will need to be removed to enable development. Landscape has no objections to the scheme.

**Drainage**

Some drainage details have been submitted for the scheme, however, NWWM do not raise any objections to the application and recommend the imposition of a drainage condition.

**Residential amenity considerations**

No objections have been submitted and it is considered that the scheme would not hinder amenities of existing occupiers.

**Sustainability**

The application site is located within easy walking distance of Redditch Town Centre which provides the expected wide range of commercial, retail and leisure facilities. It is also within a few minutes' walk of the Town's rail and bus stations. The proposed residential development therefore benefits from the NPPF's "presumption in favour of sustainable development" and also complies with the NPPF's objective of significantly boosting the supply of housing in this area.

In addition, the scheme meets the NPPF requirements to make "effective use" of under-utilised land, with the proposed density of redevelopment reflecting the site's highly sustainable location.

Members will be aware that the Council cannot demonstrate a 5 year supply of housing land within the Borough. Para. 11 of the NPPF say that in such circumstances relevant policies for the supply of housing should not be considered up-to-date. The so called tilted balance as advocated by the NPPF is engaged and the presumption in favour of sustainable development applies. Where relevant policies are out of date, Para. 11 advises that permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework taken as a whole. Therefore, significant weight should be afforded to the fact that the scheme would make a meaningful contribution to the Council's housing figures where the Council cannot demonstrate a 5 year supply of housing land as required under the NPPF.

**Planning obligations**

Contributions are required for the scale of the development proposed. This would be sought via a planning obligation and cover the following matters:

**Open space**

Contributions towards off site open space provision due to increase demand from future residents, required in compliance with the SPD. In this case, a contribution to support improvements to the public open space / play area at Glover Street. For sports



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improvements, a need has been identified by Worcestershire Cricket Board for infrastructure developments at Redditch Cricket Club ground on Bromsgrove Road.

**Waste**

Contributions for refuse and re-cycling bins for the new development in accordance with Policy WCS.17 of the adopted Worcestershire Waste Core Strategy.

**Highways**

Contributions towards the Infrastructure Delivery Plan to mitigate for the additional demands on the wider transport and localised improvements.

**Affordable housing**

Policy 6 of Local Plan No.4 requires the provision of 30% affordable housing on sites of 11 or more dwellings, incorporating a mix of tenure types. Due to the nature of the development, the scheme would be providing a supported housing scheme and shared ownership apartments in this area of the Town Centre. As such the scheme meets the needs for affordable housing in a sustainable location and is supported by Housing Strategy.

**NHS**

Worcestershire Acute Hospitals NHS Trust have requested a contribution based on evidence that the existing, ageing population and future population growth will require additional healthcare infrastructure to enable it to continue to meet the acute and community healthcare needs of the local population.

The applicant is agreeable to contributions for the matters set out above.

**Conclusion**

The site is ideally located for residential redevelopment being located within easy walking distance of Redditch bus station, train station and the wide range of facilities within the Town Centre. The application therefore benefits from the NPPF's presumption in favour of sustainable development and complies with Local Plan Policy 5 in respect to high density development.

The scheme would be a high density development that would create a vibrant and attractive scheme in this area of the Town.

**RECOMMENDATION:**

**That having regard to the development plan and to all other material considerations, authority be delegated to the head of Planning and Regeneration to GRANT planning permission subject to:-**

- a) **The satisfactory completion of a S106 planning obligation ensuring that:**

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- Contributions are paid to the Borough Council in respect to off-site open space, and equipped play and sport provision in accordance with the Councils adopted SPD.
- Contributions are paid to the Borough Council towards the provision of domestic and recycling bins for the new development in accordance with the County's Waste Strategy.
- Contributions are paid to County Highways towards IDP contributions to mitigate for the additional demands on the wider transport network that the development will generate. Plus improvements to the nearby kerbs and bus stop located on Evesham Street. A contribution towards Community Transport - the establishment of a new community car scheme which is underway in Redditch as well as upgrades to some of the streetlights within the vicinity of the site.
- Contributions are paid to NHS towards the cost of local healthcare.
- Affordable housing is provided as part of the scheme - 14 self-contained supported one bedroom flats and 13 No. shared ownership apartments.

**b) Conditions and informatives as summarised below:**

Conditions:

- 1) The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of the grant of this permission.

Reason:- In accordance with the requirements of Section 91(1) of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

- 2) The development hereby approved shall be carried out in accordance with plans and drawings to be specified.

REASON: To provide certainty to the extent of the development hereby approved in the interests of proper planning.

- 3) Prior to their first installation, details of the form, colour and finish of the materials to be used externally on the walls and roofs shall be submitted to and approved in writing by the Local Planning Authority. The materials to be approved shall be similar to those cited in Facing Materials Schedule Job No. 201806 Rev. B May 2019. The development shall then be carried out in accordance with the approved details.

Reason: To ensure that the development is satisfactory in appearance, to safeguard the visual amenities of the area.

- 4) The Development hereby approved shall not be occupied until the first 5 metres of the access into the development, measured from the edge of the carriageway, has been surfaced in a bound material.

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Reason: In the interests of highway safety.

- 5) The Development hereby approved shall not be occupied until an area has been laid out within the curtilage of the proposed development for the parking of 24 cars (Inc. 2 disabled bays) at a gradient not exceeding 1 in 8. This area shall thereafter be retained for the purpose of parking a vehicle only.

Reason: In the interests of highway safety and to ensure the free flow of traffic using the adjoining highway.

- 6) The Development hereby permitted shall not be first occupied until the proposed development has been fitted with 2 electric vehicle charging point in accordance with details that shall first be submitted to and approved in writing by the Local Planning Authority and thereafter the charging point shall be kept available for the charging of electric vehicles.

Reason: To encourage sustainable travel and healthy communities.

- 7) The Development hereby permitted shall not be first occupied until sheltered and secure cycle parking to comply with the Council's adopted highway design guide has been provided in accordance with details which shall first be submitted to and approved in writing by the Local Planning Authority and thereafter the approved cycle parking shall be kept available for the parking of bicycles only.

Reason: To comply with the Council's parking standards.

- 8) The Development hereby approved shall not be occupied until the access, parking and turning facilities have been provided as shown on drawing:  
201806 Site Plan 10E

Reason: To ensure conformity with submitted details.

- 9) Unless otherwise agreed by the Local Planning Authority development, other than that required to be carried out as part of an approved scheme of remediation, must not commence until conditions 1 to 5 have been complied with:  
1. Previous reports submitted to the Local Authority in support of the application has identified unacceptable risk(s) exist on the site as represented in the Conceptual Site Model. A scheme for detailed site investigation must be submitted to and approved in writing by the Local Planning Authority prior to being undertaken to address those unacceptable risks identified. The scheme must be designed to assess the nature and extent of any contamination and must be led by the findings of the preliminary risk assessment. The investigation and risk assessment scheme must be compiled by competent persons and must be designed in accordance with DEFRA and the Environment Agency's "Model Procedures for the Management of Contaminated Land, CLR11"

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2. Detailed site investigation and risk assessment must be undertaken and a written report of the findings produced. This report must be approved by the Local Planning Authority prior to any development taking place. The investigation and risk assessment must be undertaken by competent persons and must be conducted in accordance with DEFRA and the Environment Agency's "Model Procedures for the Management of Contaminated Land, CLR11"
3. Where identified as necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to identified receptors must be prepared and is subject to the approval of the Local Planning Authority in advance of undertaking. The remediation scheme must ensure that the site will not qualify as Contaminated Land under Part 2A Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
4. The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development, other than that required to carry out remediation, unless otherwise agreed in writing by the Local Planning Authority.
5. Following the completion of the measures identified in the approved remediation scheme a validation report that demonstrates the effectiveness of the remediation carried out must be produced, and is subject to the approval of the Local Planning Authority prior to the occupation of any buildings.
6. In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken and where necessary a remediation scheme must be prepared, these will be subject to the approval of the Local Planning Authority. Following the completion of any measures identified in the approved remediation scheme a validation report must be prepared, which is subject to the approval in writing of the Local Planning Authority prior to the occupation of any buildings.

Reason:- To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

- 10) No development above foundation level of the scheme hereby approved shall take place until a scheme for surface and foul water drainage has been submitted to, and approved in writing by the Local Planning Authority. The scheme shall include the results of an assessment into the potential of disposing of surface water by means of a sustainable drainage system (SuDS) and shall provide an appropriate

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level of runoff attenuation and treatment. The approved scheme shall be completed prior to the first use of the development hereby approved.

Reason: In order to ensure satisfactory drainage conditions that will not create or exacerbate flood risk on site or within the surrounding local area.

- 11) No development shall take place until a programme of archaeological work including a Written Scheme of Investigation, has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of significance and research questions; and:
- a) The programme and methodology of site investigation and recording.
  - b) The programme for post investigation assessment.
  - c) Provision to be made for analysis of the site investigation and recording.
  - d) Provision to be made for publication and dissemination of the analysis and records of the site investigation
  - e) Provision to be made for archive deposition of the analysis and records of the site investigation
  - f) Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation.

The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (1) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

Reason: In accordance with the requirements of paragraph 199 of the National Planning Policy Framework.

- 12) No demolition, site clearance or development shall take place until all trees and hedges and their root protection areas (RPA) to be retained on the site must be protected during clearance and construction phase in accordance with BS5837:2012 and shall remain in situ for the duration of the development.

Reason:-To ensure the protection of trees and hedgerows in the interests of visual amenity.

- 13) No development above foundation level of the scheme hereby approved shall take place until all hard and soft landscaping details have been submitted to and agreed by the Local Planning Authority. The approved works shall be carried out in accordance with the approved details. The works shall be carried out prior to the occupation of any part of the development or in accordance with a programme agreed in writing by the local planning authority. Any trees or plants which within a period of 5 years from the completion of the development die, are removed or become seriously damaged or diseased shall be replaced in the next planting

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season with others of similar sizes or species unless the local planning authority gives written approval to any variation.

Reason:- In the interests of the visual amenity of the area.

- 14) Appropriate ecology condition(s) in accordance with BS42020:2013 Biodiversity - Code of practice for planning and development.

**Procedural matters**

This application is being reported to the Planning Committee because the application is a major residential development and includes a S106 Agreement. As such the application falls outside the scheme of delegation to Officers.