

Redditch Borough Council Planning Policy comments on Land at Barn House Farm Foxlydiat Lane Planning Application (19/01356/FUL)

1. Background

- 1.1 Bromsgrove District Council (BDC) has received a Full Planning Application for Land at Barn House Farm, which forms a small parcel of the much larger Foxlydiat development site (RCBD1 'Redditch Cross Boundary Development' in the Bromsgrove Local Plan).
- 1.2 The Barn House Farm Planning Application was received by BDC as an outline application in 2017. At this point Redditch Borough Council (RBC) Strategic Planning Team prepared a response, which was approved by Redditch Planning Committee on 12th Dec 2018. The planning application is yet to be considered by Bromsgrove Planning Committee; however, in the intervening period the applicant has submitted this full planning application.
- 1.3 The differences between the outline application and the full application include a change from 68 dwellings to 63, and also details on access, car parking, open space provision and associated infrastructure (following demolition of existing buildings).
- 1.4 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 RBC 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 and the remaining Foxlydiat designated site on all other sides. It is located in the Tardebigge Ward of Bromsgrove and within the Bentley Paucefoot Parish Council area. The site is located within the larger Foxlydiat development site.
- 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 National Planning Policy Framework (NPPF) was published in 2018 and amended in February 2019. 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 was released in July 2018 and is based on 2014 household projections, it is intended the methodology is a starting point for allocating housing numbers.

- 3.2 As stated it is important to highlight that the results of the 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). This application does provide affordable housing but does not meet the amount required by local planning policy (this is discussed further below). The NPPF places great importance on the delivery of affordable housing.

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 and as an Appendix in 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 RCBD1 is in accordance with the policies set out in the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG). Therefore 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 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 its delivery forming part of the five year housing land supply for Redditch.

5.2 The Application has stated that 36.5% affordable housing will be provided, RCBD1 requires 40% of affordable housing and therefore another 3 units of affordable housing would ensure this element of the proposal would be policy compliant. Without this adjustment the RBC policy team would object to this application.

5.3 Policy RCBD1 makes reference to a mix of house types and sizes. The updated plans submitted show a deviation from the planning application form with regard to market housing. One 2 bed house and two 3 bed houses have been removed and three 4 bed houses have been included. The mix of housing proposed is demonstrated in the following:

Market Housing				
1 Bed	2 Bed	3 Bed	4 Bed	Total
0	0	23	17	40
Affordable Housing				
1 Bed	2 Bed	3 Bed	4 Bed	Total
8	12	3	0	23

5.4 The table above does not demonstrate a mix of house types and tenures (as required by the policy). A mix which includes a proportion of smaller market housing properties would be preferable; including some bungalows with small gardens (to avoid land-hungry plots) would be suggested. It is welcomed that, like the market housing, the affordable housing is to meet Redditch needs.

6. Transport

6.1 Redditch Borough Council would like to stress that it will only be supportive of the development being granted permission if all appropriate transport mitigation measures have been fully outlined and accounted for and the impact of the site has been considered cumulatively alongside the wider Foxlydiate site, at both the construction stage and thereafter, and also with regard to other development sites in the vicinity. It is considered the impacts can only be fully known 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 are addressed. The Transport Assessment submitted alongside the application provides details at paragraph 4.3 regarding pedestrian links which appear to provide an adequate connection to the wider site.

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 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.

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 countryside beyond.
- 9.2 The dwellings should have maximum sustainability credentials; in particular energy neutral approaches should be designed in along with charging points for electric vehicles in dwellings being fully incorporated.

10. Section 106

- 10.1 The provision of infrastructure at the appropriate time is essential in the successful delivery of any project. The delay in the provision of necessary improvements to

local infrastructure and services can have negative impacts on both existing residents and the occupants of new development; this must be guarded against through the effective use of Section 106 agreements. Trigger points must be clearly set out and agreed to ensure that contributions are made in a timely manner, especially with regard to education contributions.

11. Conclusion

- 11.1 For clarity this site is not within the Green Belt and forms part of the wider Foxlydiate site in accordance with Policy RCBD1 'Redditch Cross Boundary Development'. The site contributes a continued supply of much needed housing for Redditch, including a continued contribution of affordable housing. It is considered 3 more units of affordable housing on site would ensure policy compliance. Redditch Borough Council would like to stress that it will only be supportive of the development being granted permission if all appropriate transport mitigation measures have been fully outlined and accounted for and the impact of the site has been considered cumulatively alongside the wider Foxlydiate site, at both the construction stage and thereafter, and also with regard to other development sites in the vicinity.