

**BOROUGH OF REDDITCH LOCAL
PLAN – SUMMARY OF SCOPING
CONSULTATION**
OCTOBER 2026

Borough of Redditch Local Plan – Summary of scoping consultation (October 2026)

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Section 1 – Introduction

1.1 Overview of Borough of Redditch Local Plan Scoping Consultation

- 1.1.1 Redditch Borough Council ('RBC') is in the process of reviewing and replacing the adopted Borough of Redditch Local Plan No.4 (2011–2030, adopted January 2017). The forthcoming Borough of Redditch Local Plan will be developed as a new style local plan in line with the Levelling-up and Regeneration Act 2023. It will be prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2026, which came into effect on 25th March 2026, and the Planning and Compulsory Purchase Act 2004 (as amended).
- 1.1.2 The scoping consultation marks the first consultation in preparing the Local Plan under the new plan-making system. Redditch Borough Council undertook a six-week scoping consultation between 3rd July and 14th August 2026. The Council invited representations on matters relevant to the preparation of the Local Plan, including what the Local Plan should contain, and the methods by which stakeholders should be engaged in its development, in accordance with Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2026.
- 1.1.3 More specifically, the scoping consultation sought views on the key priorities and challenges facing the Borough; the vision and objectives for the Local Plan; the potential scope of locally specific topic-based policies; the evidence base needed to support the Local Plan; and the proposed consultation and engagement strategy. Questions were posed to help guide responses and to enable the Council to gather meaningful feedback as the Local Plan progresses.
- 1.1.4 The scoping consultation was concerned with establishing the scope and parameters of the Local Plan, rather than considering specific proposals such as the identification of development sites or the drafting of planning policies. Opportunities to comment on these matters will be provided through future consultation stages.
- 1.1.5 As Section 2 outlines, there were 33 individual respondents to the scoping consultation (8 from the public, 18 from consultation bodies and other stakeholders, and 7 on behalf of developers and landowners). Section 3 provides a summary of the main issues raised and RBC's response to representations received. Section 4 outlines the next steps.
- 1.1.6 This summary of scoping consultation should be read alongside the scoping document, available on the Council's website – <https://www.redditchbc.gov.uk/redditchplan-scoping>.
- 1.1.7 The scoping consultation followed the publication of the Local Plan timetable and the notice of intention to commence local plan preparation on 29th June 2026, which are available to view on the Council's website – <https://www.redditchbc.gov.uk/redditchplan>.

Section 2 – Consultation bodies and other stakeholders invited to make representations

2.1 General and specific consultation bodies invited to make representations

- 2.1.1 The table below sets out the general consultation bodies and specific consultation bodies, as defined under regulation 2 of the Town and Country Planning (Local Planning) (England) Regulations 2026, who were invited by email to make representations under regulation 20 (scoping consultation) and whether they responded to the scoping consultation.

General / specific consultation body consulted	Responded to the scoping consultation
Active Travel England	
Ofcom	
Openreach	
BT	
EE	
NOW TV	
O2	
Plusnet	
Sky	
TalkTalk	
Three	
Virgin Media	
Vodafone	
CTIL	
MBNL	
Canal & River Trust	
Civil Aviation Authority	
Coal Authority/ Mining Remediation Authority	
Sport England	
Environment Agency	
Forestry Commission	
Worcestershire County Council	
Warwickshire County Council	
National Highways	
Historic England	
Homes England	
NHS Herefordshire and Worcestershire ICB	
National Grid Electricity Distribution (NGED)	
National Grid Electricity Transmission (NGET)	
Cadent Gas	
Severn Trent Water	
Marine Management Organisation	
Natural England	
Network Rail Infrastructure Limited	
Office for Nuclear Regulation	
Office of Rail and Road	
Stratford-on-Avon District Council	

Wychavon District Council	
Bromsgrove District Council	
Worcestershire Regulatory Services	
Feckenham Parish Council	
Alvechurch Parish Council	
Tutnall and Cobley Parish Council	
Bentley Pauncefoot Parish Council	
Hanbury Parish Council	
Stock and Bradley Parish Council	
Inkberrow Parish Council	
Cookhill Parish Council	
Sambourne Parish Council	
Studley Parish Council	
Mappleborough Green Parish Council	
Beoley Parish Council	
West Mercia Police	
Warwickshire Police	
North Worcestershire Water Management	

2.2 Other stakeholders invited to make representations

- 2.2.1 Any person or other stakeholders were able to make representations to the scoping consultation. The table below lists the other consultation bodies (not general or specific consultation bodies, public or developers/landowners/planning agents) who were consulted by email as part of the Council's Local Plan consultation database. For clarity, everyone else on the Council's Local Plan consultation database were also notified by email, including members of the public, schools, GP surgeries & primary care networks, developers / landowners / planning agents and other stakeholders.

Other consultation bodies consulted	Responded to the scoping consultation
Cannock Chase District Council	
Lichfield District Council	
South Staffordshire District Council	
Dudley Metropolitan Borough Council	
Sandwell Metropolitan Borough Council	
Walsall Council	
Wolverhampton City Council	
Birmingham City Council	
Solihull Metropolitan Borough Council	
Tamworth Borough Council	
Wyre Forest District Council	
Staffordshire County Council	
Stoke Parish Council	
Tanworth in Arden Parish Council	
West Midlands Combined Authority	
Transport for West Midlands	
Worcestershire Wildlife Trust	
Worcestershire Local Enterprise Partnership	
Redditch BID	
Greater Birmingham & Solihull Growth Hub	
Kingfisher Shopping Centre	

NHS England	
NHS Birmingham and Solihull ICB	
Worcestershire Primary Care Trust	
Hereford & Worcester Fire and Rescue Service	
South Staffs Water	
Joint Committee of the National Amenity Societies	
The Gardens Trust	
Twentieth Century Society	
Victorian Society	
Georgian Group	

Section 3 – Summary of the main issues raised and RBC’s response

3.1 Overview

- 3.1.1 This section provides a summary of the main issues raised in the representations received by the questions asked in the scoping document and how RBC have had regard/response to those representations to date. Sub-section 3.7 provides an overview of the responses received that do not specifically relate to any of the scoping questions posed in the document. Please note, not all respondents answered all the questions set out in the scoping document/Smart Survey questionnaire which explains why the response rate by question does not tally with the number of respondents.

3.2 Key priorities and challenges – Questions 1a and 1b

- 3.2.1 The key priorities and challenges section of the scoping document (section 3) explored the priorities and challenges from the adopted Borough of Redditch Local Plan No. 4 (2011-2030) and the priorities and challenges consulted on last summer (2025) during the Issues and Options consultation, under the legacy plan-making system. An updated list of priorities and challenges were consulted on during this scoping consultation covering housing; economy; town centre and local centres; infrastructure; design; environment; and health. The tables below provides a summary of matters raised and underneath RBC’s response to questions 1a and 1b.

Question 1a: Are these priorities correct? Yes / No / Unsure
Responses: 22
• Yes: 64% • No: 23% • Unsure: 13%

Question 1b: Are there any priorities that you would change or add? Please explain your answer
Responses: 20
<u>Summary of matters raised</u>
Public responses
• Provide additional green space like Morton Stanley Park. • With reference to the adopted Local Plan challenges, RBC needs to explore what it can build and meet its own need before looking elsewhere. • Support for inward investment, economic growth, regenerating the town centre and protecting the environment. • Recognise importance of maintaining/ improving district centres as a hub for the local community.

Supporting local independent businesses and manufacturers by reducing planning restrictions and making it easier to invest and expand.
Some support for turning empty retail units in housing or regenerating empty town centre areas and local centres.
Good design will give people a feeling of space.
Place greater emphasis on protecting the Green Belt and open countryside, including from cross-border housing shortfalls
Some support for regenerating existing urban areas before considering releasing greenfield land.
Delivering higher quality housing rather than simply increasing housing numbers. Redditch should avoid becoming dominated by large, low-quality housing estates that place additional pressure on services.
Improving roads, parking and infrastructure before permitting significant new development.
With Local Government Reorganisation creating a new North Worcestershire Council, Redditch risks being isolated, vulnerable to regional housing targets and vulnerable to a Greater Birmingham expansion. A priority should be to protect the distinct, green identity of Redditch as a separate entity from the West Midlands.
Consultation bodies and other stakeholders responses
Community Campaigner – traditional architectural design codes for new developments and protection of existing historical buildings (including non-designated heritage assets and unclassified historic buildings).
Sport England – recommends strengthening the priorities by making more explicit reference to the provision, protection and enhancement of sport, recreation and physical activity infrastructure (including open spaces, playing fields, sports pitches and green infrastructure). Promoting multifunctional green infrastructure that supports recreation, biodiversity, climate resilience and community wellbeing.
Sport England – whilst health is identified as a priority, the current wording focuses primarily on access to green space and community facilities. The Local Plan should recognise the important role that sport and recreational facilities play in improving health outcomes, reducing inequalities, supporting social cohesion and creating sustainable communities.
Sport England – recommends additional priorities relating to access to sport, recreation and physical activity. Ensuring new development supports active lifestyles through access to formal and informal recreation.
Sport England – ensure sufficient indoor and outdoor sports facilities to meet needs arising from existing and future populations. Additionally, enhancing connectivity to sports facilities through active travel.
Sport England – include a standalone priority “Creating active, healthy and inclusive communities through the protection, enhancement and delivery of sport, recreation and physical activity infrastructure”.
Natural England – recommend amending some of the priorities to be more specific and naming Green Infrastructure specifically. Additionally, Nature Recovery Networks and the Worcestershire LNRS should feature as a key priority.
Natural England – plan should contain policies to mitigate and adapt to climate change impacts on the natural environment. Your plan should recognise that climate change mitigation and adaptation and biodiversity loss are interlinked. Many habitats provide essential ecosystem services to allow adaptation to climate change e.g. natural flood management, as well as mitigation e.g. through tree planting and retaining peat as a carbon store. Policies should set out appropriate nature-based solutions for climate mitigation and adaptation such as woodland or wetland creation or peatland restoration. Policies should

address water use, promoting the use of sustainable drainage systems (SuDS) and water sensitive design as part of a wider green infrastructure approach.
• Natural England – recommend that the Local Plan includes policies to reflect the 5 headline Green Infrastructure Standards (Green Infrastructure Strategy Standard; Accessible Greenspace Standards; Urban Nature Recovery Standard; Urban Greening Factor; and Urban Tree Canopy Cover) in Natural England's Green Infrastructure Framework Principles and Standards for England.
• Natural England – embedding green infrastructure into walking and cycling routes can encourage the uptake of active travel, supporting increased physical activity, improved air quality and the reduction in vehicular traffic. Creating green corridors assists with urban cooling and increases people's opportunities to connect with nature.
• Natural England – note the importance that nature plays in supporting our health and wellbeing. Natural England advise increasing access to urban green space; ensure availability and access to a variety of green and blue spaces (parks, playgrounds, woodlands, community gardens, allotments, water features, etc.); improve the quality of existing green and blue spaces; and include community gardens and food growing spaces.
• Environment Agency – we agree with them, particularly reference to sustainable development location, brownfield sites, infrastructure, natural environment (flooding, wildlife), reduction of carbon emissions and adapting to climate change. ○ Brownfield development and contaminated land – redevelopment of brownfield sites, while they may be preferable for other reasons, are more likely to encounter issues with contaminated land. ○ The Borough is predominantly underlain by rocks of the Mercia Mudstone Group. The mudstone formation is classified as a secondary B aquifer and is generally of low permeability with groundwater here generally of lower sensitivity. Within the southern part of the borough, the formation is overlain by river terrace deposits and alluvium associated with surface watercourses. These superficial deposits are capable of supporting small scale groundwater abstractions and also support baseflow to rivers. Groundwater is considered to be of higher sensitivity where these superficial deposits are present. ○ There are no groundwater source protection zones designated within the area covered by the local plan and no groundwater public water supply abstractions are currently present within the area. ○ Reference to Environment Agency databases indicates the presence of several historic landfills within the Plan area. Parts of Redditch have an industrial legacy which may have resulted in the presence of historic contamination. Any identified sites upon brownfield land may need a level of risk assessment to ensure that the site is deliverable prior to allocation. ○ Green Infrastructure – encourage you to emphasise the importance of the water environment (ponds, rivers, streams, wetlands) as part of your nature-based strategy and to further highlight the benefits from integrating blue and green infrastructure (urban cooling, carbon sequestration, natural flood management, nature recovery) even at a small scale (green walls & roofs, SuDS). There could be a stronger focus on enhancing biodiversity along the River Arrow and its tributaries. Enhancements can include increasing in stream connectivity, improving riparian habitats, managing Invasive Non Native

Species (INNS) and increasing native planting. We would support proposals for de-culverting of existing watercourses.

- Waste water infrastructure – infrastructure could also refer to the water environment (water quality and quantity). Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). Water supply and wastewater treatment capacity should be available and implemented ahead of development, without causing deterioration of any watercourse in accordance with the Water Framework Directive and/or adverse effects on designated sites. Developments may need to be phased to coincide with planned infrastructure upgrades, to ensure there is sufficient capacity/water supplies that can continue to meet the needs of new development and the wider environment. A water cycle study will investigate this and should provide clear recommendations for an emerging Local Plan.
- Water resources and availability – strategic plan-making should make an important contribution in reducing pressure on available water resources by planning developments in accordance with water cycle studies and in alignment with Water Resources Management Plans. This should ensure developments are phased, located appropriately and designed to use water efficiently. Climate change could result in an increase in water scarcity which is why measures to reduce demand (and by doing so, reduce the detrimental impact on the water environment of abstracting that water) are so important. We expect the water efficiency standard required in local plan policy for all new residential developments to be designed to utilise no more than 100 litres per person per day, or future successor standards where more stringent. This goes beyond the optional higher standard as per Regulation 36 of the Building Regulations 2010 (amended 2015).
- Biodiversity Net Gain – should consider increasing the requirements for Biodiversity Net Gain (BNG) beyond the national minimum to further enhance biodiversity in the area. Higher BNG targets would encourage more ambitious and effective habitat creation, restoration, and connectivity within developments. This would help offset the cumulative impact of growth and contribute to long-term ecological resilience and nature recovery in Redditch. The Local Nature Recovery Strategy (LNRS) would be a useful tool in identifying potential areas of biodiversity and ecological enhancements. New developments should incorporate measures to protect, enhance, and create habitat corridors that improve ecological connectivity between development sites and existing blue/green spaces.
- Flood risk – the NPPF sets out the requirement for Local Plans to apply the flood risk sequential test to the selection of growth areas and sites.
- Climate change – we are encouraging all Local Authorities to identify climate change as an overall Development Plan priority and to align policies with national net zero targets and mitigation policies. There is a statutory duty on LPAs to include policies in their Local Plans designed to tackle climate change and its impacts.
- Renewable energy – we note the inclusion of climate change, and would welcome consideration of renewable energy provision. Renewable energy is an important part of the solution to reducing greenhouse gas emissions and meeting future energy needs.

○ Agents of change – we note the ambition to attract business to the area. If industry is encouraged locally through the local plan, the EA has highlighted former NPPF paragraphs 193 and 200. Recommend planning policies ensure that appropriate assessment and mitigation can be carried out by the agent of change (i.e. residential allocations). Where any mitigation is not practical, we highlight the importance of providing a minimum distance buffer zone between land uses to protect neighbours from amenity impacts associated with waste activities (noise and vibration, dust, odour, litter, flies etc) and reduce tensions between conflicting land uses.
• Worcestershire County Council – recommend including the word “enhancing” under bullet point 2 of the environment priority.
• Worcestershire County Council – the environment priority would benefit from the recognition that the enhancement of the Borough’s existing network of landscape features and the creation of new habitat links are at the core of achieving enhancements to biodiversity.
• Worcestershire County Council – the Local Plan should promote age-friendly communities through accessible and adaptable housing, specialist accommodation, extra care housing and lifetime neighbourhood principles. New development should be located close to services, healthcare, public transport and community facilities to support independent living and reduce social isolation.
• Worcestershire County Council – the health priority should be expanded beyond access to green space and community facilities. The Plan should require healthy place-making principles that promote physical activity, mental wellbeing and social inclusion through walkable neighbourhoods, active travel routes, access to open space and community infrastructure. Health inequalities should also be considered as part of future growth and development.
• Worcestershire County Council – whilst our responsibilities to prepare a Minerals and Waste Local Plan are separate to those for Redditch to prepare a Local Plan, the need to safeguard existing waste management sites, mineral resources and mineral infrastructure in the Borough will need to be considered during the development of the Redditch Local Plan and should be recognised in the economic and environmental priorities for the area.
• Dudley Metropolitan Borough Council – DMBC agree that sustainable growth (including housing and employment) should be the priority of the plan. This should also include the potential contribution that sites may make towards addressing unmet housing and employment needs arising from neighbouring authorities.
• NHS Herefordshire and Worcestershire ICB – the health priority is currently framed solely around promoting healthier lifestyles through access to green space and community facilities. The ICB strongly supports healthy place-making but considers this framing incomplete: it addresses the determinants of health without addressing the capacity of healthcare services themselves. Suggestion: “Ensuring that primary and community healthcare infrastructure has sufficient capacity to serve the existing population and planned growth, with new development contributing towards the expansion, reconfiguration or provision of healthcare premises where a capacity impact is identified.”
• Historic England – ‘Conserving and promoting historic assets and local heritage...’ is identified in the priority for the historic environment. Is an historic asset the same as a heritage asset? How would the emerging Plan manage impacts on significance of heritage assets through changes within their setting? Does historic asset include designated and non-designated heritage assets? How is local heritage different to those?

• Suggestion to revise the priority: “Conserving and enhancing the historic environment, heritage assets and their setting, including Redditch’s needlemaking heritage and post-war identity where appropriate”. Please note we have removed ‘promote’ as we have separate advice on tourism aspects.
• Historic England – tourism appears to be included with the historic environment when each could be individual priorities. Tourism aligns with many Local Plan topics as a standalone subject as does heritage. Recommend tourism is considered in the economy priority instead.
• Historic England – note that climate change does not appear in the revised list of priorities and challenges set out in Section 3.4 New Priorities and Challenges compared to the previous Issues and Options. Considers this is an omission.
• Tetlow King Planning obo West Midlands Housing Association Planning Consortium – the Local Plan should seek to maximise delivery of affordable housing through both site allocations and development management policies, ensuring that future housing growth contributes towards meeting identified local needs and improving housing affordability for current and future residents.
On behalf of developers and landowners responses
• Harris Lamb obo Taylor Wimpey – RBC should meet its housing needs in full within its own administrative area first, including utilising the Green Belt. The priority should be amended to include reference to undertaking a review of the Green Belt to meet the housing needs in full.
• Harris Lamb obo Taylor Wimpey – Redditch should help contribute to meeting the unmet housing needs within the Greater Birmingham and Black Country Housing Market Area.
• Harris Lamb obo Taylor Wimpey – delivery of housing should be considered in line with the quantum and location of employment land to be proposed.
• Harris Lamb obo Taylor Wimpey – agree that new development should be adequately served by new or upgraded infrastructure. The requirements to deliver infrastructure should not present an impediment to the delivery of new housing and be planned so that it delivers to meet the needs of new residents.
• Harris Lamb obo Taylor Wimpey – welcome the intention to achieve high quality design through new housing development although have reservations about the application of design coding to the delivery of new housing. Agreeing design codes on individual smaller sites can delay sites coming forward.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – greater emphasis on the delivery of housing and a key priority should be to “meet Redditch’s housing need in full” as well as considering whether a contribution to the unmet needs of the GBBCHMA.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – the Standard Method for the calculation of local housing need is only the ‘starting point’ for identifying the housing requirement for the plan. RBC should consider planning for a higher requirement in order to meet affordable housing needs and stimulate economic growth, for example.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – the priorities and challenges under ‘economy’ are restricted to investment in businesses and alignment to regional economic strategies; consider that there should also be greater emphasis on recognising the economic benefits brought by housing delivery.
• Tetra Tech obo Taylor Wimpey Strategic Land – the reference to "potential cross-boundary allocations" is welcomed but does not reflect the reality that cross-boundary supply has been a long-standing feature of Redditch's plan making. The adopted BORLP already planned to meet the majority of the Borough's identified housing need on sites in Bromsgrove District – recognising

the constrained nature of the Redditch boundary. That constraint has since intensified with the December 2024 Standard Method uplift to 486 dpa and the current 3.06-year land supply position. Cross-boundary working should therefore be positioned as a headline strategic priority.
• Ridge and Partners LLP obo HarperCrewe – based on the previous plan’s strategy to address these challenges, it is considered that housing delivery and meeting housing need needs to be reflected as a stronger priority.
• Ridge and Partners LLP obo HarperCrewe – overplays the role that brownfield land in the Borough is likely to have in addressing housing need as there is limited brownfield opportunities – the brownfield land register, last dated 2021, identifies only 14 sites with an indicative capacity of only 399 dwellings, many of the sites are labelled as already under construction or even complete.
• Ridge and Partners LLP obo HarperCrewe – Future LHN as assessed through the new standard method is considerably higher than has been planned for or delivered in the borough previously. PDL opportunities are very limited and will likely play only a minor role in addressing the required housing growth. The Local Plan must identify sufficient opportunities to accommodate growth throughout the plan period in other ways.
• Ridge and Partners LLP obo HarperCrewe – a stronger priority should be ensuring that infrastructure delivery keeps pace and is at a level that facilitates the significant housing growth required. Housing growth and infrastructure delivery should be planned together as opposed to being separate priorities, which is why it is considered that a specific priority relating to infrastructure led growth, or amending the infrastructure priority within the plan to tie it to supporting housing growth explicitly.

RBC’s response:

- 3.2.2 Understanding the priorities and challenges is one of the first key steps in the production of the Borough of Redditch Local Plan so that the Local Plan can address the right matters, as appropriate. It is noted that almost two-thirds of respondents agree with the priorities and challenges set out which were shaped by responses to the issues identified in the previous Issues and Options consultation last summer.
- 3.2.3 A range of priorities and challenges have been identified by different groups, most of which the Local Plan can address, for example exploring how the Borough’s housing need is met; economic growth; environmental protection; climate change; biodiversity; high quality design; sports, recreation and open space; the historic environment; and infrastructure provision. The Council will consider the new and suggested amendments to the identified priorities during the preparation of the Local Plan. Ultimately, the priorities will shape the vision for the Local Plan; the aims and objectives; the spatial strategy; allocated sites; and local policies. These matters will be the focus of future consultations.

3.3 Vision and objectives – Questions 2a, 2b, 3a and 3b

- 3.3.1 The vision and objectives section of the scoping document (section 4) explored what a local plan vision is; feedback on the comments received from the Issues and Options consultation relating to the emerging vision; and suggested potential aims and objectives for feedback covering a wide range of matters within the remit of the Local Plan. The tables below provide a summary of matters raised and underneath RBC’s response to questions 2a, 2b, 3a and 3b.

Question 2a: Is our vision from the Issues and Options consultation still applicable to Redditch Borough? Yes / No / Unsure

Responses: 23

- Yes: 70%
- No: 17%
- Unsure: 13%

Question 2b: What would you change or add to the vision? Please explain your answer.

Responses: 20

Summary of matters raised

Public responses

- What does 'greener' mean? Does it mean maintaining the green spaces in the Borough?
- The vision should place greater emphasis on protecting what makes Redditch attractive.
- Would like Redditch to become one of the best places in Worcestershire to run a business, a town with a thriving independent economy, strong manufacturing sector.
- The countryside, Green Belt and local character are protected for future generations.
- Infrastructure is delivered before development rather than afterwards.
- The town centre is revitalised through investment and business confidence rather than over-reliance on residential development.
- Growth should be sustainable and proportionate rather than driven solely by housing targets.
- With Local Government Reorganisation the vision should state that Redditch will remain distinct from the West Midlands conurbation and focus on keeping Redditch a green, self-contained Worcestershire town rather than allowing it to be treated as an overspill area for neighbouring city regions.
- In light of LGR, add connecting with/embracing/focusing/positively contributing to a North Worcestershire housing market / local economy / cultural and leisure offer.
- Include a dedicated objective to actively resist urban sprawl, protect our surrounding Green Belt buffers, and enhance network of public rights of way.
- Focus more of making the best use of existing assets not demolishing buildings then paying to rebuild them. Scrap plans to waste more money on the town centre which is too large for the needs of the town, refocus investment on developing local hubs/centres to build community spirit.
- Some areas in the vision the Council do not have the power to change e.g. health care services, like doctors & dentists. The NHS has already said that Redditch does not need any more provision.

Consultation bodies and other stakeholders responses

- Community Campaigner – traditional architectural design codes/methods must be a forefront focus and the protection of existing historical buildings (including non-designated heritage assets and unclassified historic buildings).
- Sport England – supports the overall vision, however, recommends strengthening the vision through a more explicit commitment to creating an active and healthy borough. The vision also does not specifically recognise the

role that sport, recreation and physical activity play in delivering healthier communities and reducing health inequalities.
• Sport England – suggests the vision could be amended to include wording such as “Redditch will be an active, healthy and inclusive Borough where people of all ages and abilities have access to high-quality sport, recreation, leisure, open space and active travel opportunities that support physical and mental wellbeing.”
• North Worcestershire Water Management – further clarification and inclusion of watercourses as a green space in Redditch should be added. Similarly, Redditch should be resilient to existing flood risk, along with future flood risk influenced by climate change.
• Natural England – Your plan’s vision and emerging development strategy should address impacts on and opportunities for the natural environment and set out the environmental ambition for the plan area. It is critical that the vision of your local plan is underpinned by climate and biodiversity resilience, nature recovery, access to green space and linking corridors alongside transport mobility strategies, and peoples access to nature for health and wellbeing.
• Natural England – Your plan should include the natural environment in its long-term vision and objectives for the plan area. These should be based on local characteristics and circumstances and include locally specific goals for nature recovery and enhancement, supported by policies and proposals in the plan.
• Natural England – Your plan should take a strategic approach to the protection and enhancement of the natural environment, including providing a net gain for biodiversity, considering opportunities to enhance and improve connectivity. Where relevant there should be linkages with the Biodiversity Action Plan, Local Nature Partnership, National Park/Area of Outstanding Natural Beauty Management Plans, Rights of Way Improvement Plans and Green Infrastructure Strategies, Nature Recovery Network.
• Worcestershire County Council – when discussing aspirations in section 4.1.1 (first bullet point) and identified emerging vision for the Local Plan (para 4.2.1) we suggest removing the word “decent” and replace with “Redditch will have better designed more energy efficient homes...” The sentence as it stands is awkward in the context of the rest of the vision statement.
• Worcestershire County Council – suggest changing “Redditch will draw upon its post-war heritage” to “Redditch will draw upon its historic landscape and post-war heritage to adapt...” The post-war development of Redditch is distinctive but is not the whole story of the town and its wider borough. The landscape character of the town and countryside is well developed and offers a strong framework to support creative adaptations.
• Worcestershire County Council – suggest adding the word “environment” to the first sentence ‘Redditch to become a greener, safer place with pride in its heritage and environment’. We would also suggest green infrastructure/natural environment, is changed to an enhanced environment and green infrastructure to avoid repetition of energy efficient.
• Worcestershire County Council – suggest a greater emphasis on healthy communities and suggest the following wording “Redditch will be a healthy, inclusive and age-friendly Borough where residents can access homes, services, employment, healthcare, green spaces and community facilities through safe and sustainable travel choices.”
• NHS Herefordshire and Worcestershire ICB – agree with respondents to the I&Os consultation support for infrastructure-led approach to growth with improvements to local services; and asks that “local services” is understood to include healthcare.
• NHS Herefordshire and Worcestershire ICB – consideration could be given to referencing health and wellbeing explicitly within the vision text, given the Plan

period to 2044 will coincide with continued growth in the Borough's older population and in the prevalence of long-term conditions.
National Highways – policy needs to be clear that growth occurs in locations that are sustainable and that any associated transport infrastructure supports active and sustainable travel as the primary mode choice.
On behalf of developers and landowners responses
Harris Lamb obo Taylor Wimpey – reference to Redditch having more decent, energy efficient homes is vague and does not convey a clear vision of what is required. Instead, TW would suggest that the vision refers to Redditch having more homes, of the right sizes, tenures that are energy efficient and located in the right place.
Harris Lamb obo Taylor Wimpey – in respect of employment space, TW welcome the intention to allow businesses to thrive and grow although the focus on creating highly skilled jobs, whilst welcome, detracts from the delivery of a range of different types of jobs that would be open to people of all ages with different skills levels and ambitions.
- Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – considered that some elements of the vision are vague, for instance, 'decent homes' and 'energy efficient homes' should be clearly defined if included in the vision. - There is too much emphasis on heritage and energy standards, and it lacks an overall focus on housing delivery and growth. Given the significant housing need of the Borough, it is considered that a balanced approach to the protection of heritage, nature and town landscapes should be taken which ensures compliance with key sections of the Framework which seek to protect such assets.
- Tetra Tech obo Taylor Wimpey Strategic Land – the current vision is weighted towards environmental, heritage and design themes. Whilst those themes are supported, the vision does not fully reflect the scale of the social and economic challenges facing the Borough, particularly housing, despite these forming a central part of the priorities. If the vision is to be a direct response to the issues, an explicit housing-delivery theme should be built in from the outset. - The vision should also positively frame the reality that, given the Borough's significant housing need, the Council should consider opportunities to meet development needs both within and, where appropriate, beyond its administrative boundaries.
Tetra Tech obo Taylor Wimpey Strategic Land – encourage the Council to consider a longer plan period of up to 20 years. In this context, the Council may wish to look to a 20-year period from Gateway 1 which would build in some time to reach adoption. This may provide further resilience from the outset.
Ridge and Partners LLP obo HarperCrewe – the vision should be amended to place greater emphasis on positively planning for growth, meeting housing needs and delivering affordable housing.

RBC's response:

- 3.3.2 The vision will describe how Redditch Borough should grow, change and what it will look like by the end of the Local Plan period, and it has a role in addressing the priorities and challenges identified. The vision sets the foundation for the Local Plan's aims and objectives; strategy; site allocations; and policies.
- 3.3.3 Although 70% of respondents agree that our vision from the Issues and Options consultation is still applicable, the vision can still be improved using the feedback

received. A proposed vision will be consulted on at the next local plan content and evidence consultation.

Question 3a: Do you agree with the proposed aims and objectives? Yes / No / Unsure

Responses: 23

- Yes: 65%
- No: 26%
- Unsure: 9%

Question 3b: Are there any aims and objectives that you would change or add? Please explain your answer.

Responses: 21

Summary of matters raised

Public responses

- Protect the Green Belt except in genuinely exceptional circumstances.
- Brownfield-first development as an absolute principle. Brownfield sites are available within the town centre but have not been developed. The Council should look to building council houses on them.
- Support the expansion of existing businesses and attract higher-skilled employment.
- Reduce unnecessary planning bureaucracy for commercial investment.
- Ensure infrastructure – including roads, GP surgeries, schools, drainage and parking – is delivered before major development.
- Encourage high-quality architecture that reflects Redditch's character rather than standardised housing estates.
- Objective to formally protect all established public rights of way, ancient woodlands, and natural corridors from fragmentation.
- Given Local Government Reorganisation, the economic and spatial objectives must explicitly rule out the sacrifice of designated Green Belt land to meet cross-boundary housing targets, ensuring our local growth remains sustainable and contained within existing urban footprints.
- Local residents should have their say on what happens on their doorstep. The plan is too vague and open to manipulation. Everyone wants a better town however without any real specifics you are asking people to vote on a dream.
- Remove provision for additional housing.
- In light of LGR, add connecting with/embracing/focusing/positively contributing to a North Worcestershire housing market / local economy / cultural and leisure offer.

Consultation bodies and other stakeholders responses

- Community Campaigner – traditional architectural design codes/methods for new developments, including placemaking principles, greenery, authentic period-style cast iron street furniture, free car parking to stimulate economic activity, support supply chains of physical skills and raw materials, ban on demolition of buildings constructed prior to 1950.
- Sport England – additional objective relating to active communities – “Ensure that all residents have access to high-quality sport, recreation and physical activity opportunities through the protection, enhancement and provision of playing fields, sports facilities, open spaces and active travel networks.”

• Sport England – Strengthen "Provide the infrastructure required to support Redditch and its future growth" Amend to include: "...including transport, education, healthcare, community facilities, sport and recreation infrastructure." This recognises that sports facilities are essential social infrastructure required to support planned growth.
• Sport England – Strengthen "Promote a greener, more environmentally resilient Redditch" Add reference to: "Protecting and enhancing parks, playing fields, green infrastructure and recreational spaces that support biodiversity, climate resilience and health outcomes."
• Sport England – "Strengthen "Improve sustainability and connectivity" Add: "Creating connected walking, wheeling and cycling networks that provide safe access to schools, employment areas, local centres, parks and sports facilities."
• Sport England – "Strengthen "Create healthy, safe and inclusive communities" Add: "Improving opportunities for participation in sport and physical activity and reducing health inequalities through the design of places and provision of community infrastructure."
• Sport England – suggested measurable outcomes including: ○ Percentage of residents living within walking distance of accessible open space and sports facilities. ○ Amount of playing field and recreational land protected and enhanced. ○ Delivery of new sport and recreation facilities alongside development. ○ Increase in active travel journeys. ○ Improvements in physical activity participation rates and reductions in inactivity levels.
• North Worcestershire Water Management – inclusion of watercourses as part of Redditch's green spaces.
• Natural England – the 'Promote a Greener, more environmentally resilient Redditch' objective should make reference to the Worcestershire LNRS.
• Natural England – the 'Improve sustainability and connectivity' objective should include reference to promoting active travel.
• Environment Agency – improvements to the potential aims and objectives: ○ Infrastructure and utilities, especially water availability and foul drainage should be brought forward in advance of development. ○ Regarding brownfield development, ensure that a potentially contaminated site is deliverable and that the allocation numbers can be achieved. ○ Greener and more environmentally resilient, including green corridors could refer to the LNRS as an important tool in understanding areas of opportunity. ○ Agree that appropriate housing should be delivered in appropriate areas, for example, not within areas of increased fluvial flood risk (refer to sequential test). ○ Delivering high quality, sustainable designs could seek to include water efficiency / water recycling measures as well as energy efficiency.
• Worcestershire County Council – there is a lack of clear reference to heritage, safeguarding of heritage assets and the enhancement of their setting. There's no reference to the conservation, enhancement and promotion of the town's heritage (despite its referenced in priorities and vision as a key opportunity). • Suggested objective – support growth that respects, conserves and enhances the historic environment, recognising its cultural, social and economic value to current and future generations.
• Worcestershire County Council – While it is implied there should be a more explicit reference to the distinctive landscape character of Redditch, given the range of functions that it supports and are listed in the aims and objectives.

The value of landscape is wide and particularly important in supporting ecosystem services, the provision of healthy and attractive places (this should not be limited to POS), provides the setting of heritage assets and older settlements, in addition to its integrated place within Redditch town. The Plan will need to support delivery of LNRS and other conservation measures to align the aims and objectives with both the vision & wider environmental trends.
- Worcestershire County Council – suggested additional objectives: - Promote Age-Friendly Communities – ensure new development supports people to live independently throughout all stages of life through accessible homes, specialist accommodation where required, walkable neighbourhoods and access to healthcare, public transport and community facilities. - Reduce Health Inequalities – use planning policies to improve access to green infrastructure, sport, recreation, healthcare and community facilities, particularly in areas experiencing deprivation and poorer health outcomes.
NHS Herefordshire and Worcestershire ICB – recommends that one measurable outcome relates to healthcare infrastructure, for example, the proportion of residential allocations supported by secured healthcare contributions, so that the alignment of growth and health infrastructure can be monitored transparently over the Plan period.
Historic England – disappointing that the suggested objectives do not recognise the opportunities for the historic environment to contribute to the delivery of the new Plan's priorities.
Tetlow King Planning obo West Midlands Housing Association Planning Consortium – affordability is referenced within the proposed objective, the scale of affordable housing need in Redditch warrants a stronger and more explicit commitment within the Local Plan's objectives. The Council has identified shortages in affordable housing as a key challenge for the Borough and this should be reflected throughout the Plan's strategic objectives and any housing related future policies.
Tetlow King Planning obo West Midlands Housing Association Planning Consortium – welcome an objective focused on development deliverability and viability. This should recognise the need to balance affordable housing delivery, infrastructure provision, environmental requirements and design standards to ensure planned growth can be successfully brought forward over plan period.
On behalf of developers and landowners responses
Harris Lamb obo Taylor Wimpey – concerned by the use of the word “phase” in relation to the delivery of new development. TW would wish to avoid a situation where the phasing of new development was such that it would prevent new development coming forward in a timely manner. TW fully acknowledge the need to deliver infrastructure that is aligned with the development but consider that this could be achieved through appropriately worded policies, CIL and Section 106 agreements.
Harris Lamb obo Taylor Wimpey – in respect of the prioritising brownfield first and urban regeneration, this is a matter of principle that all new developments would need to adhere to in any case. In light of the NPPF's proposed presumption in favour of development on previously developed sites within urban areas, TW query whether this objective is necessary.
Harris Lamb obo Taylor Wimpey – TW welcome the opportunity to strengthen public transport and deliver safe and attractive walking and cycling networks but consider that the reference to encouraging active travel should also be added to this objective.

Harris Lamb obo Taylor Wimpey – welcome the intention to deliver the right mix of homes with a strong focus on affordability and provision for different life stages. Suggest that a reference to homes being delivered in the right location, that are accessible to services and facilities should be added to the objective.
Harris Lamb obo Taylor Wimpey – In relation to the spatial strategy, TW contend that the Council should seek to meet all of its housing needs within its own administrative area first before looking to adjoining neighbours to meet any unmet need that cannot be accommodated within Redditch. Any needs that are to be met in adjoining authorities should if at all possible be met on sites that adjoin Redditch town rather than them being remote from it.
Tetra Tech obo Taylor Wimpey Strategic Land – whilst the brownfield-first aim is compliant with national policy, it does not explicitly follow that green belt release should be undertaken in accordance with paragraphs 143, 148 and 155 of the NPPF, prioritising previously developed land, then grey belt, and then other green belt where release is necessary. Given the Borough's tightly drawn boundary, the substantial LHN uplift (486 dpa) and the current 3.06-year housing land supply position, the aim should be reframed to make this sequential logic explicit.
Tetra Tech obo Taylor Wimpey Strategic Land – suggest the addition of a new aim reflecting the Borough's long-established reliance on cross-boundary supply, and the shared Greater Birmingham and Black Country Housing Market Area geography with Stratford-on-Avon District: "Work with adjoining authorities to secure cross-boundary allocations where these represent the most sustainable option for accommodating Redditch's growth".
Ridge and Partners LLP obo HarperCrewe – whilst there is reference to “delivering affordable and appropriate housing”, it does not place sufficient emphasis on the importance of delivering housing growth and identifying land to meet future development need.
Ridge and Partners LLP obo HarperCrewe – the vision and associated potential aims and objectives therefore have a heavy emphasis on environmental quality, community wellbeing and the protection of assets yet very limited reference to accommodating future housing needs.
Ridge and Partners LLP obo HarperCrewe – the focus on PDL is disproportionate to the actual opportunity to deliver housing growth on these sites in the borough.
Ridge and Partners LLP obo HarperCrewe – given the scale of housing growth that the district is likely to have to accommodate, infrastructure provision will be critical in determining where development can be delivered sustainably. The emerging plan should recognise that investment in education, community facilities and other infrastructure can increase the capacity of settlements to accommodate additional growth and, in some instances, help unlock sustainable development opportunities that might otherwise been constrained.

RBC's response:

- 3.3.4 The Government's Local Plan guidance outlines that the vision statement should include and be split into clear and focussed paragraphs based on specific aims and objectives. These aims and objectives should be aspirational underpinned by a realistic appreciation of what the Local Plan's policies can genuinely shape and deliver. No more than 10 measurable outcomes will be identified to help monitor progress towards meeting the vision statement.
- 3.3.5 It is understood that almost two-thirds of respondents agree with the proposed aims and objectives. Respondents highlighted a wide range of aims and objectives, some of which are already covered by the proposed aims and objectives. New objectives

and amendments were identified and will be considered as we develop the aims and objectives to be consulted on at the next local plan content and evidence consultation.

3.4 Local Plan topic-based content – Questions 4a, 4b, 5a and 5b

- 3.4.1 The local plan topic-based content section of the scoping document (section 5) explored current and emerging (at the time of the scoping consultation, the August 2026 version of the NPPF was not published) national policy in the NPPF. The section sought feedback on the indicative content of the new-style Borough of Redditch Local Plan and the potential topic-based policies the Local Plan could contain. The tables below provide a summary of matters raised and underneath RBC's response to questions 4a, 4b, 5a and 5b.

Question 4a: Do you agree with the indicative content of the Borough of Redditch Local Plan? Yes / No / Unsure
Responses: 24
• Yes: 79% • No: 13% • Unsure: 8%

Question 4b: Is there any content you would change or add? Please explain your answer.
Responses: 20
<u>Summary of matters raised</u>
Public responses
• Planning process needs to be easier. • Should include strong policies regarding: ○ Green Belt protection. ○ Protection of agricultural land. ○ Town centre business incentives. ○ Support for independent retailers. ○ Protection of employment land from unnecessary conversion to housing. ○ Parking standards that recognise the reality of modern family and business life. ○ Infrastructure delivery tied directly to new development. • Policy specifically addressing cross-boundary strategic pressures. With the transition to a new North Worcestershire Council, the content needs explicit policies that protect existing Green Belt boundaries from being reallocated to absorb external urban housing shortfalls. • Policy addressing green infrastructure networks. The environment section must include enforceable content on the preservation, mapping, and enhancement of all public rights of way and wildlife corridors to ensure they cannot be fragmented by streamlined planning processes. • Provide the detail at the consultation stage, how can anyone support a proposal when it contains no detail. Without a clear picture of what would happen the consultation is meaningless, leaving the council free to do whatever it likes without the agreement of residents.

Consultation bodies and other stakeholders responses
Community Campaigner – traditional architectural design codes/methods for new developments, including placemaking principles, greenery, authentic period-style cast iron street furniture, free car parking to stimulate economic activity, support supply chains of physical skills and raw materials, ban on demolition of buildings constructed prior to 1950.
Sport England – recommends that the Local Plan explicitly identifies sport, recreation, physical activity and active design as key components of infrastructure planning and healthy place-making.
Sport England – recommends that the Local Plan includes measurable outcomes relating to health and physical activity, such as improving access to sports facilities, open space and active travel opportunities. This would align with the proposed vision, infrastructure-led growth agenda and objective of creating healthy and inclusive communities
Environment Agency – the spatial strategy should be informed by a robust evidence base. Particular reference should be made to flood risk, provision of infrastructure (water supply and foul drainage) and consideration of climate change.
- Worcestershire County Council: - Under “Environment” add landscape. It is important to recognise that landscape is a product of both natural and cultural processes and therefore it is not accurate to group it under “natural environment.” - Age-friendly communities and specialist accommodation for older people. - Accessible and adaptable housing standards. - Health inequalities and access to healthcare infrastructure. - Electric vehicle charging infrastructure
NHS Herefordshire and Worcestershire ICB – asks that healthcare is expressly identified within infrastructure provision and contributions to support the delivery of the Local Plan, and that the supporting Infrastructure Delivery Plan identifies primary and community healthcare requirements arising from the growth strategy and the delivery mechanism for each.
Historic England – recommend content in respect of the historic environment, heritage assets and their setting but acknowledges the approach set out and that content will become clearer once the NPPF has been issued.
Tetlow King Planning obo West Midlands Housing Association Planning Consortium – housing is listed in the draft framework; it is assumed that this includes the provision of affordable housing.
On behalf of developers and landowners responses
Harris Lamb obo Taylor Wimpey – we would hazard against duplication about the spatial strategy and land allocations overlapping with site allocation policies. Ideally, they would only need to be a single set of allocations with associated policies that would set out what was required rather than duplicating these within the Local Plan.
Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – housing should have greater emphasis in the emerging Local Plan. A key focus of the Local Plan should be to ensure sufficient homes are provided to meet the Council’s objectively assessed needs in order to ensure that the plan is positively prepared in line with the requirements of the NPPF paragraph 36(a). It is also considered that the affordable need should be assessed and whether there is a need to increase the housing requirement to account for this.
Tetra Tech obo Taylor Wimpey Strategic Land – the Spatial Strategy should be prepared on a functional geography basis, reflecting that Redditch's

development needs are unlikely to be met solely within the administrative boundary.
Tetra Tech obo Taylor Wimpey Strategic Land – site allocations should include, where justified, cross-boundary sites identified through joint working with Stratford-on-Avon District Council.
Tetra Tech obo Taylor Wimpey Strategic Land – given the functional relationship between cross-boundary sites and the Redditch urban area, the Council's Infrastructure Delivery Plan should account for the population and service demand associated with cross-boundary developments that are directly served by Redditch's services, schools, healthcare, employment and retail offer. Planned strategic growth facilitated through an Infrastructure Delivery Plan and Whole Plan Viability Assessment can provide both patronage and support a sustainable cross-boundary growth strategy.
Tetra Tech obo Taylor Wimpey Strategic Land – the Local Plan should acknowledge that Green Belt release will be necessary to meet the Borough's identified housing need, with grey belt sites positioned as the first source of supply beyond previously developed land, consistent with the current NPPF.
Ridge and Partners LLP obo HarperCrewe – a clear and effective spatial strategy with policies for the amount of housing development and an assessment of strategic growth options will be vital components. Given the constraints affecting the Borough, this is likely to require consideration of locations beyond the existing urban area, including sustainable locations within the Green Belt and Open Countryside.

RBC's response:

- 3.4.2 Question 4b was sometimes misunderstood with potential policies the Local Plan could include e.g. parking standards (which is the focus of questions 5a and b), rather than the content/structure of the Local Plan.
- 3.4.3 The content of local plans to be produced under the new plan-making system is clearer now that the August 2026 NPPF has been published, which was only in a draft form at the time of the scoping consultation. The consultation responses received and the publication of the August 2026 NPPF will continue to be reviewed and will be reflected in the next local plan content and evidence consultation.

Question 5a: Do you agree with the topic-based policies that the Borough of Redditch Local Plan could contain? Yes / No / Unsure

Responses: 24

- Yes: 75%
- No: 8%
- Unsure: 17%

Question 5b: Are there any topic-based policies that you would change or add? Please explain your answer.

Responses: 21

Summary of matters raised

Public responses

- Add policies covering:
 - Permanent protection of important countryside and landscape views.

○ Greater support for advanced manufacturing and skilled employment. ○ Protection of existing industrial estates. ○ Greater flexibility for rural businesses. ○ Strong design standards. ○ Higher parking standards and enforcement. ○ Better management of delivery and servicing within the town centre. ○ Protection of local shopping centres from becoming dominated by vacant units or unsuitable uses.
● Contain a specific topic-based policy on 'Green Belt Integrity and Border Buffers'. This policy must explicitly state that Redditch will not release Green Belt land or alter boundaries to accommodate the unmet housing needs of neighbouring urban areas outside Worcestershire.
● There should be a robust 'Green Infrastructure and Accessibility' policy that legally protects all existing public rights of way, leisure routes, and natural spaces from being encroached upon by new developments, ensuring our town's distinct green character is preserved.
● Some of the areas highlighted do not fall under the remit of Redditch Borough Council but under the County Council.
Consultation bodies and other stakeholders responses
● Community Campaigner – key objective is traditional architecture.
● Sport England – inclusion of specific policies addressing the following matters: ○ Protection and Enhancement of Sports Facilities – a policy should seek to protect existing sports facilities, playing fields, playing pitches and recreational land from loss unless robust evidence demonstrates they are surplus to requirements or suitable replacement provision at least equivalent quantity and quality is secured. ○ Provision of Sport and Recreation Infrastructure – a policy should require new development to contribute towards the provision, improvement and long-term maintenance of sport and recreation facilities where demand is generated by development. Sport England note the NPPF consultation document advocates the use of standards for open space and playing field land, if this is introduced Sport England would advocate local standards based on an up-to-date Playing Pitch Strategy as opposed to the utilisation of national standards. ○ Active Design and Healthy Communities – a policy should support the application of Active Design principles to ensure development: • Encourages everyday physical activity. • Creates attractive and safe walking, wheeling and cycling environments. • Integrates homes with schools, employment areas, local centres, open spaces and sports facilities. • Reduces reliance on private car travel.
● North Worcestershire Water Management – much of the information in the 2017 Local Plan should still be used, however the following information should be included on top of this: ○ There should be specific mention of a required watercourse buffer of between 5-10m from development. ○ The National Standards for SuDS (2025) should be referenced to summarise the national expectations for sustainable drainage. ○ The Local Plan should also include reference to the SuDS Design Guide (2018) created by Redditch Borough Council in partner with various district councils. ○ While the current local plan mentions Flood Zone models in terms of development, many sites that do experience significant flooding are not included on the national Flood Zone modelling due to catchment restrictions. As such, it would be necessary to specify that

developments containing, or within close proximity to, a watercourse must provide site-specific fluvial flood risk modelling. ○ To ensure the protection of Redditch's water quality in the natural environment, the Local Plan must mention the need for the SuDS treatment train, and the Simple Index Approach to mitigate pollution. ○ There must also be mention of ensuring developers stay within the greenfield runoff rates on sites, when designing drainage systems.
• Natural England – would like to see the inclusion of strategic policies on: ○ Geodiversity and Biodiversity ○ Designated sites ○ Biodiversity Net Gain ○ Green and Blue Infrastructure ○ Local Nature Recovery Strategy ○ Water Quality and Resources and Flood Risk Management ○ Protecting Best and Most Versatile Land ○ Protected Landscapes ○ Connecting People with Nature ○ Health and Wellbeing
• National Grid Electricity Transmission – NGET understand the need for allocating land for housing and employment and support such development. However, where proposed sites interact directly with, or border an NGET asset, there is a requirement for such assets to be considered within any future policy regarding the sites. NGET do not seek to prevent development of sites which interact with assts, however, a considered and proactive approach to proposed allocations which interact with NGET assets will assist in mitigating against any potential issues that could arise from development within close proximity of such assets.
• Environment Agency – understand the approach and the areas highlighted, specifically flood risk, water (environment), air quality, climate change and site allocations. Further evidence will likely be required to support these chapters. You could consider adding renewable energy into the list.
• Worcestershire County Council – Landscape could be added as a specific thematic area. To embed it in Natural Environment and Historic Environment is valid to a point, but it risks being reductive given the multifunctional services that landscape supports that is expressed through landscape character.
• Worcestershire County Council – a policy requiring developments to support ageing well through accessible and adaptable homes, specialist accommodation, inclusive design, safe walking routes and access to services and facilities.
• Worcestershire County Council – a policy requiring major developments to demonstrate how they will support physical activity, mental wellbeing, social interaction, access to green infrastructure and healthy lifestyles.
• Worcestershire County Council – depending on the final decision-making policies in the NPPF when it is published, and any forthcoming updates to National Planning Policy for Waste, as well as how these issues will be addressed in the forthcoming Minerals and Waste Plan documents, it may be appropriate to include policy/ies referring to impacts from non-mineral and waste development on safeguarding mineral resources, mineral sites and supporting infrastructure, and waste management sites. • Although very limited in extent, there are some safeguarded terrace and glacial sand and gravel resources within the borough. There are also two supporting mineral infrastructure sites. There are a number of waste management sites within the borough.
• Worcestershire County Council – The site allocations process and future policy development should be informed by the consideration of how any safeguarded mineral resources, mineral sites and supporting infrastructure, and waste

management sites could be affected, and the need to apply the “agent of change” principle.
Worcestershire County Council – the development of the Redditch Local Plan could help to facilitate waste management development, which can often be an appropriate use on industrial estates. We would ask that that waste needs be recognised among other industrial and employment land requirements in calculating employment land allocation requirements.
Dudley Metropolitan Borough Council – request that wider housing need including unmet needs in the Greater Birmingham and Black Country Housing Market Area (GBBCHMA) is considered when selecting the chosen spatial strategy and housing requirement.
Dudley Metropolitan Borough Council – highlight the need to consider the accommodation requirements of Gypsy and Traveller communities and Travelling Showpeople. Emerging evidence indicates that accommodation shortfalls are arising across parts of the conurbation and in neighbouring authorities.
Dudley Metropolitan Borough Council – advocates identifying employment land requirements, ensuring that sufficient land is allocated not only to meet Redditch’s own economic development needs but also the potential to support unmet employment land requirements arising from neighbouring Functional Economic Market Areas (FEMAs) where sustainable opportunities exist.
- NHS Herefordshire and Worcestershire ICB – recommends a locally specific policy covering: - Developer contributions towards healthcare. - Plan-led approach to healthcare mitigation – the Local Plan and its Infrastructure Delivery Plan should establish clearly that residential development which increases demand on primary and community healthcare will be expected to mitigate that impact through Section 106 contributions. - Health Impact Assessment – requirement for major development to be accompanied by a Health Impact Assessment. - Healthcare land and premises – policy support in principle for the provision, extension, reconfiguration or redevelopment of healthcare facilities; and provision, within any strategic scale allocation, for the assessment of whether on-site healthcare floorspace (or land for it) is justified by the cumulative capacity impact of that allocation together with committed development in the same practice catchments. - Housing mix and specialist housing – where policies promote older persons’, extra care or C2 accommodation, those policies should acknowledge the associated enhanced healthcare demand.
Historic England – recommend the inclusion of policies for the historic environment, heritage assets and their setting.
Tetlow King Planning obo West Midlands Housing Association Planning Consortium – the Local Plan should include a clear and comprehensive affordable housing strategy; including consideration of affordable housing need, tenure requirements, delivery mechanisms, rural and specialist affordable housing provision, and monitoring arrangements to assess delivery over the plan period.
On behalf of developers and landowners responses
Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – any policies in relation to housing size and tenure/ mix should be determined on a site-by-site basis, based upon the latest available evidence at the point of submission.
Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – housing requirement should be formulated

using the standard method as a minimum, however other factors such as unmet need from neighbouring authorities and affordable housing need should be factored in and the housing need increased accordingly.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – the environment and climate change theme is also considered to be important, although this should not go beyond Building Regulations based on a Ministerial Statement, titled ‘Planning – Local Energy Efficiency Standards Update’ produced on 13 December 2023. In addition to the above guidance, it is also likely that the Future Homes Standard will be implemented in advance of the emerging Local Plan being adopted.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – development should not be required to deliver Biodiversity Net Gain in excess of the statutory 10% requirement, as this often leads to significant viability challenges and can also result in an inefficient use of land as more land is required to be left undeveloped.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – greater emphasis on ‘Site allocation policies’, with particular guidance for strategic allocations. Any criteria included within the site allocation policies should however be agreed and discussed with the relevant developer to ensure what is included is appropriate and would not cause any deliverability issues.
• Tetra Tech obo Taylor Wimpey Strategic Land – subject to the final form of the NPPF, we encourage the Council to include the following locally specific policies: ○ Cross-boundary growth and cooperation. A dedicated policy setting out how sites at the edge of Redditch that lie within neighbouring administrative boundaries – but which share a functional relationship with the Borough – will be identified, assessed and, where justified, allocated. ○ Grey belt. A specific policy on grey belt land, reflecting the criteria at paragraphs 155–157 of the NPPF.
• Ridge and Partners LLP obo HarperCrewe – should contain a policy relating to Green Belt assessment and release where required to meet housing need. It is likely that housing growth requirements may require consideration of Green Belt land. In fact, where identified needs cannot be met, the NPPF mandates a review of Green Belt boundaries. • Given the challenges, an assessment of sustainable opportunities within the Green Belt will be vital in informing the strategic growth options of the plan and is a matter that needs greater recognition within the proposed scope of the plan

RBC’s response:

- 3.4.4 Three-quarters of respondents agree with the topic-based policies that the Borough of Redditch Local Plan could contain.
- 3.4.5 Local plans to be prepared under the new plan-making system will be substantively different to local plans adopted under the legacy plan-making system. New style local plans will be more concise and streamlined and will not include all of the wide array of policies typically found in historically adopted local plans. The role of national policy has changed.
- 3.4.6 The scoping document acknowledged that at the time of publication the draft NPPF published in December 2025 was not in its definitive final form and therefore the scope of the policies in the draft NPPF were uncertain. Now that the finalised version of the NPPF, published in August 2026, is available the Council will continue to fully

review the policies within the Framework. This will ensure the Local Plan is consistent with national policy, including not containing policies which duplicate, substantively restate or are inconsistent with the content of national decision-making policies, unless directed by other policies in the Framework, in accordance with policies PM6 and PM15. This will enable the Council to prepare necessary justified locally specific policies that are compliant with national policy.

- 3.4.7 Opportunities to provide comments on any locally specific policies and the content of the local plan will be available at the subsequent local plan content and evidence consultation stage, as well as during the proposed local plan consultation.

3.5 Local Plan evidence base – Questions 6a and 6b

- 3.5.1 The Local Plan evidence base section of the scoping document (section 6) explored the evidence base compiled to date, the evidence currently being prepared, and the evidence that may require updating or new evidence. Feedback was sought on the proposed evidence base and any additional evidence required. The tables below provide a summary of matters raised and underneath RBC's response to questions 6a and 6b.

Question 6a: Do you agree with the evidence base to support the Local Plan (table 2)? Yes / No / Unsure
Responses: 21
• Yes: 67% • No: 24% • Unsure: 9%

Question 6b: Is there any evidence you would change or add? Please explain your answer.
Responses: 23
<u>Summary of matters raised</u>
Public responses
• Ensure landscape sensitivity. • What evidence nothing is there? As a community member who has provided evidence of at least one area I would be interested to know why some of those things haven't started yet? • At least 1 estate has independent research on what it needs and has been voicing it for a long time and offering to continue to find the funding. Why is there no green spaces reports? • The Council should also prepare evidence relating to: ○ Road congestion and junction capacity. ○ GP and NHS capacity. ○ School places. ○ Utility capacity (water, electricity and sewerage). ○ The cumulative effect of housing growth. ○ Commercial demand from existing Redditch businesses. ○ Retail leakage to neighbouring towns. ○ Parking demand across Redditch.

• The Local Plan should be evidence-led rather than target-led.
• The evidence base must be expanded to include studies that address the impending North Worcestershire Council reorganisation and the preservation of our natural spaces.
• An updated 'Green Belt Purposes Assessment' is required to specifically evaluate the role of Redditch's borders in preventing merging with the West Midlands conurbation.
• A comprehensive 'Green Infrastructure and Public Rights of Way Audit' must be added to formally map all nature trails and walking routes, ensuring their protection is based on complete data.
• A strategic study to assess how the structural shift to a North Worcestershire authority will impact our capacity to resist external housing targets.
• I find the evidence questionable, no involvement with a good number of residents. How can you provide evidence around a plans impact if you have not drawn up the plan yet.
Consultation bodies and other stakeholders responses
• Sport England – Indoor and Built Sports Facilities Assessment: ○ Whilst the evidence base includes an updated Playing Pitch and Outdoor Sports Strategy, Sport England recommends the preparation or update an Indoor and Built Facilities Assessment in line with Sport England guidance. ○ This should assess the quantity, quality, accessibility and future needs for facilities such as: ▪ Sports halls; ▪ Swimming pools; ▪ Health and fitness facilities; ▪ Indoor tennis and other specialist sports facilities; ▪ Community sports facilities. ○ This evidence will help identify investment priorities and ensure that future development is supported by an appropriate range of sports infrastructure.
• Sport England – Playing Pitch and Outdoor Sports Evidence: ○ Sport England welcomes the inclusion of the Playing Pitch and Outdoor Sports Strategy and recommends that it is reviewed and updated to reflect: ▪ Population growth forecasts; ▪ Changes in supply and demand; ▪ Facility quality and accessibility; ▪ Future demand generated by housing growth.
• Sport England – Sports Facility Strategy: ○ The Council should consider preparing a wider Sports Facility Strategy which draws together the findings of both indoor and outdoor facility assessments and identifies: ▪ Current deficiencies; ▪ Future infrastructure requirements; ▪ Investment priorities; ▪ Opportunities for co-location and community sports hubs.
• Sport England – strongly supports preparation of the Infrastructure Delivery Plan and recommends that it explicitly identifies: ○ Indoor and outdoor sports infrastructure needs; ○ Playing fields and recreation provision; ○ Funding requirements; ○ Potential developer contributions and delivery mechanisms required to support planned growth.

• Natural England – the strategy for allocating land should avoid protected sites and apply the biodiversity mitigation hierarchy in the NPPF; give great weight to conserving and enhancing designated landscapes; and avoid the loss of best and most versatile agricultural land. Site selection evidence base should include: ○ Landscape and Visual Impact Assessments, Landscape Sensitivity Assessments and Landscape Character Assessments. ○ Soil surveys and mapping (Agricultural Land Classification available on Magic maps) ○ ecological surveys, green infrastructure and biodiversity opportunity mapping. ○ Must also be informed by the Sustainability Appraisal, Strategic Environmental Assessment and Habitats Regulations Assessment.
• Environment Agency – agree (and provided guidance) with the listed documents that are needed within their remit including the Sustainability Appraisal and SEA; Site Assessment and Selection Methodology; Strategic Flood Risk Assessment Levels 1&2; Infrastructure Delivery Plan; Water Cycle Study; Habitats Regulations Assessment; and Green Infrastructure, Ecology and Biodiversity Assessment.
• Environment Agency – concur that a Strategic Environmental Assessment (SEA) will be required. ○ The SEA themes should incorporate the ‘SEA topics’ suggested by Annex I(f) of the SEA Directive, including biodiversity, flood risk, climate change (incorporating mitigation and adaptation), soil and water quality/resources. ○ Climate change – must include policies designed to secure the development and use of land contributes to the mitigation of, and adaptation to, climate change. The forthcoming Plan should seek to ensure that air, water and soil quality is improved and that the use of natural resources is sustainable, including water. ○ The SA should seek to identify and address potential negative effects on the water environment, including implications relating to wastewater.
• Worcestershire County Council – the County Historic Environment Record (HER) should be a key evidence base for the Heritage Impact Assessment (HIA).
• Worcestershire County Council – the County Landscape Character Assessment (LCA) evidence base is currently in the process of being updated with a new addition of urban areas being included. The County Historic Landscape Character (HLC) mapping adds time depth and a finer grain of assessment. Both LCA and HLC should be considered material in the preparation of the Landscape Sensitivity Assessment and Heritage Impact Assessment.
• Worcestershire County Council – additional evidence should be prepared to support future policies relating to health and wellbeing and ageing well.
• Worcestershire County Council – the plan should allow for appropriate waste management facilities to come forward. This can be enabled through allocating sites for a broad range of employment uses, and these needs should be considered in developing/updating the HEDNA.
• Dudley Metropolitan Borough Council – request that regional / sub-regional evidence bases e.g. the GBBCHMA Strategic Growth Study Refresh is fully considered.
• NHS Herefordshire and Worcestershire ICB – requests that it is engaged as a named stakeholder in the preparation of the Infrastructure Delivery Plan and the Health Impact Assessment. We would also encourage engagement with Worcestershire Acute Hospitals NHS Trust, and Herefordshire and

Worcestershire Health and Care NHS Trust so that acute and community infrastructure, including the role of the Alexandra Hospital, is properly reflected.
• NHS Herefordshire and Worcestershire ICB – asks to be consulted on the scope of the SEA.
• Historic England – has published a document relating to site allocations in Local Plans which covers all types of allocation and sets out a site selection methodology in relation to heritage assets.
• Tetlow King Planning obo West Midlands Housing Association Planning Consortium – alongside an updated assessment of affordable housing need, evidence should be prepared in respect of the need for accessible and adaptable housing, space standards, climate change requirements and open space, all of which can have significant implications on development viability.
• Tetlow King Planning obo West Midlands Housing Association Planning Consortium – the production of an Affordable Housing Supplementary Planning Document (SPD) would also be welcomed to provide additional guidance of how to apply future policies and obligations/requirements.
• National Highways – are keen to engage with the Council on a number of documents, most notably the Strategic Transport Assessment and Infrastructure Delivery Plan, amongst other contributing documents.
On behalf of developers and landowners responses
• Harris Lamb obo Taylor Wimpey – the Local Plan is being prepared in advance of the Spatial Development Strategy (“SDS”). There will be no overriding strategic direction for the provision of new housing and employment until such time as the SDS is prepared and adopted. Notwithstanding the above, the new Local Plan will need to have regard to wider requirements for the delivery of housing and employment in meeting these needs both within Redditch but also on the wider sub-region basis that may include meeting the needs of other authorities within the same Housing Market Area. The current Framework still requires local authorities to work with their neighbours on cross boundary matters and whilst the duty to cooperate is no longer a legal test to comply with when preparing Local Plans this has not removed the need to work collaboratively when needed.
• In light of the future requirements and the need to work cross boundary with other authorities in the same HMA to meet these needs, it is suggested that certain evidence-based documents are prepared with these wider objectives in mind e.g. the Housing and Economic Development Needs Assessment (“HEDNA”), the Green Belt and Grey Belt Assessment, the Green Belt Exceptional Circumstances Paper, Housing Land Supply Evidence and the Strategic Transport Assessment. TW consider that looking at these on a wider geography than just the administrative area of Redditch could potentially have wider benefits in seeking to meet and deliver housing and employment needs through the north Worcestershire area going forward.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – evidence pertaining to housing need, Green Belt and Site Selection is considered to be particularly important and should be commenced as soon as possible.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – site specific evidence submitted to RBC by developers should be taken into consideration when drafting these documents to ensure the Plan is in accordance with NPPF paragraph 21.
• Tetra Tech obo Taylor Wimpey Strategic Land – supports the commissioning of a Green Belt and Grey Belt Assessment and the preparation of a Sustainability Appraisal. However, to properly reflect the well-established need for cross-boundary supply, consider that the geographic scope of key evidence should

extend to settlements and land parcels outside the Redditch Borough boundary. The Green Belt and Grey Belt Assessment should be co-ordinated with the Green Belt Assessment published by Stratford-on-Avon District Council as part of the SWLP Regulation 19 document. A consistent, joint methodology across the two plan areas would avoid divergent conclusions on the same functional Green Belt parcels.
• Tetra Tech obo Taylor Wimpey Strategic Land – a Strategic Transport Assessment should be commissioned with modelled cross boundary development scenarios. It should be acknowledged that infrastructure improvements and transport assessment can assist in unlocking large scale grey belt sites.
• Tetra Tech obo Taylor Wimpey Strategic Land – Housing Land Supply Evidence should explicitly consider the potential contribution of cross-boundary sites to Redditch's five-year land supply and longer-term trajectory, recognising the precedent set by the adopted RLP4 (2017) in relying on cross boundary supply to meet identified need.
• Tetra Tech obo Taylor Wimpey Strategic Land – the SA should explicitly test cross-boundary spatial options and assess sites in adjoining authorities that adjoin the Redditch urban edge on a consistent methodology with sites within the Borough. The Council should recognise the functional relationship between the Redditch urban area and settlements/land immediately outside the Borough boundary, including Mappleborough Green, reflecting the shared HMA geography and the reality that some edge-of-Redditch locations in adjoining districts function as natural extensions of the Redditch urban area rather than as separate settlements.
• Tetra Tech obo Taylor Wimpey Strategic Land – consider preparing a Settlement Study or Growth Options Assessment. Such work should objectively consider the ability of settlements and edge-of-settlement locations to accommodate growth, taking account of factors including accessibility, sustainability credentials, infrastructure capacity, relationship to services and facilities, environmental constraints, and patterns of historic growth. A consistent methodology should be applied to locations both within and adjoining the Borough boundary to ensure that all reasonable growth options are properly assessed and compared.
• Ridge and Partners LLP obo HarperCrewe – it is vital to understand the relative contribution different parcels make to Green Belt purposes, noting the importance the NPPF places on identifying Grey Belt and the recognition that not all Green Belt sites perform the same strategic function.
• Ridge and Partners LLP obo HarperCrewe – the evidence base should be broad enough to allow the Council to properly assess alternative growth strategies capable of meeting the Borough's future housing need. Given the challenges, it is difficult to see how the Council can establish an appropriate spatial strategy unless a full range of growth options are considered including sites currently within the Green Belt, as now directed by the NPPF where needs cannot otherwise be met.
• Ridge and Partners LLP obo HarperCrewe – it is important that the HEDNA, Housing Land Supply evidence, Settlement Hierarchy Review and Site Assessment and Selection Methodology are prepared with sufficient scope to test a full range of growth options.

RBC's response:

- 3.5.2 Two-thirds of respondents agree with the evidence base documents proposed to support the production of the Local Plan. Some of the suggested additional evidence will be covered by identified evidence base documents, for example, assessment of

road congestion and junction capacity will form part of the Council's Strategic Transport Assessment.

- 3.5.3 The evidence base is fundamental to delivering a 'sound' and justified local plan. Suggested additional evidence base documents or matters to be included within already identified evidence base documents will be reviewed. Furthermore, as the Local Plan progresses, additional evidence may also need to be prepared or commissioned.

3.6 Consultation & engagement strategy – Questions 7a, 7b, 8a, 8b and 9

- 3.6.1 The consultation and engagement section of the scoping document (section 7) explored and welcomed feedback on the consultation principles proposed to guide future consultation methods. The tables below provide a summary of matters raised and underneath RBC's response to questions 7a, 7b, 8a, 8b and 9.

Question 7a: Do you agree with the consultation principles identified? Yes / No / Unsure
Responses: 19
• Yes: 74% • No: 16% • Unsure: 10%

Question 7b: What consultation principles would you change or add? Please explain your answer.
Responses: 14
<u>Summary of matters raised</u>
Public responses
• Suggest adding a principle of 'Technical Accessibility' – ensuring that for those with specialised knowledge or interest (e.g. energy, structural planning), there is a pathway to submit data-backed, technical feedback that is treated with the same weight as general feedback. • The officers are the best people to deal with the communities assets needs and their agenda of best for the town should be followed. Anyone interfering and not aiding this should be reprimanded. Paper consultation is a great idea but also be aware many community members are unable to read so an audible option for those and the blind would also be good. • The council webpages are hard work to navigate. • Videos are a good idea if there's a relatable knowledgeable worker on them explaining the idea and why. • Focus groups easily become insular and have their narrative controlled or feedback given easily twisted to fit a result already decided. They take up time people don't have working in the community and they have become a tick box exercise. When stakeholders become part of many of these they carry the narrative that isn't accurate for all. Stakeholders should be carefully chosen from proactive whole community focused stakeholders over those not willing to look at the wider community to ensure the best for all.

• The consultation should make greater efforts to engage: ○ independent businesses; ○ manufacturers; ○ town centre traders; ○ residents' associations; ○ parish councils; ○ young people who intend to remain in Redditch.
• Consultation responses should be published in a clear and transparent format showing how comments have influenced the final Local Plan.
• The consultation principles must be expanded to ensure they reach everyday working residents, rather than just those who have the spare time to attend formal meetings or navigate complex online portals. Do more to make residents aware of Local Plan consultations.
• Future consultation strategies must include proactive, plain-English outreach, specifically regarding high impact decisions like the 2028 council reorganisation and any proposed changes to our Green Belt boundaries.
• Relying heavily on digital-first methods risks shutting out a huge portion of the community.
• The council must actively meet residents, ensuring that major decisions about our town's layout are not left entirely to career politicians or restricted to boardroom discussions.
• I don't trust the council to carry out the wishes of the people of Redditch based on recent history they will just do their own thing.
• Email and ability to upload PDF documents online.
• Advertise on all noticeboards.
Consultation bodies and other stakeholders responses
• Worcestershire County Council – additional emphasis should be placed on engaging groups that are often under-represented/ seldom heard in plan-making, including older people, younger people, residents with disabilities and those experiencing health inequalities.
• Tetlow King Planning obo West Midlands Housing Association Planning Consortium – whilst digital engagement should form a central part of the consultation strategy, it is important that alternative methods of participation continue to be available e.g. ability to submit representations by email as well as on a consultation platform.
• Tetlow King Planning obo West Midlands Housing Association Planning Consortium – welcome an explicit commitment to ongoing engagement with Registered Providers and other affordable housing stakeholders throughout the plan making process.
On behalf of developers and landowners responses
• Tetra Tech obo Taylor Wimpey Strategic Land – an additional principle recognising the need to engage communities, stakeholders, parish councils and landowners immediately outside the Borough boundary should be established where cross-boundary allocations are under consideration.
• Tetra Tech obo Taylor Wimpey Strategic Land – further principle of targeted developer engagement. Planning consultants, site promoters and housebuilders are best placed to advise on the deliverability, phasing and viability of identified developments, and early engagement enables the Council to identify infrastructure bottle necks and delivery risks before draft policies and site allocations are prepared. Proactive engagement would strengthen the soundness of the emerging Plan's housing trajectory.

RBC's response:

- 3.6.2 Almost three-quarters of respondents agree with the consultation principles identified. It is acknowledged that not all of the responses to question 7b directly relate to consultation principles; instead, there are some comments that relate to consultation methods (which is the focus of questions 8a and b). The Council's consultation and engagement strategy will guide future Local Plan consultation principles and methods, taking into account the feedback received. It is important that all residents, groups, consultation bodies and the development industry from a wide demographic are encouraged to be engaged in the development of the Local Plan and there are some helpful suggestions from respondents that will be considered for future consultations.

Question 8a: Do you agree with the potential consultation methods identified? Yes / No / Unsure

Responses: 20

- Yes: 70%
- No: 20%
- Unsure: 10%

Question 8b: What potential consultation methods would you change or add? Please explain your answer.

Responses: 14

Summary of matters raised

Public responses

- More human interaction.
- More evening consultation events for working residents.
- Business roundtable meetings.
- Dedicated sessions with local employers.
- Interactive maps allowing residents to identify local issues.
- Better publicity through local newspapers, which remain an important source of trusted local information for many residents.
- Interactive workshops held in local community centres and libraries at varying times, specifically weekends and evenings.
- Information regarding major boundary or Green Belt reviews should be physically publicised via notices along public rights of way and popular natural paths, ensuring users of these spaces are directly notified.
- Documents must also be presented in short, plain-English summaries rather than dense planning jargon.
- Independent scrutiny of any plans to make sure the council carry out the wishes of the residents and don't pursue their own agenda.
- Do more to make more residents aware of these consultations. Far too often, the response to these are very low because people do not engage with such council matters like this that will/may affect them in years to come.
- Advertise on all noticeboards.

Consultation bodies and other stakeholders responses

- Natural England – find it easier for a consultation document, such as a PDF to be sent to us with the questions included. Then, we will provide a response in the same format (as a pdf letter of response). The online form means that

hyperlinks to our evidence does not show, there are word limits in the box, and it is difficult to format our response as we would wish.
- Worcestershire County Council – at 7.2.6 add accessible on-screen readers. - NHS Herefordshire and Worcestershire ICB – is invited to any focus groups proposed for community and physical infrastructure providers, and to officer-level engagement on infrastructure matters. - Tetlow King Planning obo West Midlands Housing Association Planning Consortium – encourages the Council to facilitate targeted engagement with RPs and affordable housing stakeholders at key stages of plan preparation. This could take the form of stakeholder workshops, roundtable discussions or focused evidence sessions, particularly when preparing housing evidence, viability assessments and affordable housing policies.
On behalf of developers and landowners responses
- Harris Lamb obo Taylor Wimpey – it is generally acknowledged that Local Plan consultations have a low response rate and are typically responded to by particular interest groups or those with a specific objection in mind. In light of this, any opportunity to engage with younger people or those who would not typically engage with the planning system would be welcomed and that such an approach would take some out of the box thinking to achieve so the Council could seek to engage with a wider, more diverse audience. Use of webinars or social media could be additional methods to be employed to engage with a different audience. - Tetra Tech obo Taylor Wimpey Strategic Land – the Council should directly engage with developers to support effective and informed plan-making.

RBC's response:

- 3.6.3 Over two-thirds of respondents agree with the potential consultation methods identified. The Council's consultation and engagement strategy will guide future Local Plan consultation principles and methods, taking into account the feedback received. It is important that all residents, groups, consultation bodies and the development industry from a wide demographic are encouraged to be engaged in the development of the Local Plan and there are some helpful suggestions from respondents that will be considered for future consultations.

Question 9: Do you consider there is anything else relevant to consultation that has not been mentioned? Please explain your answer.
Responses: 14
<u>Summary of matters raised</u>
Public responses
- The Local Plan should not become an exercise in meeting centrally imposed housing numbers at the expense of local character. - Redditch has a distinctive identity, excellent parks, valuable Green Belt and an established manufacturing economy. These strengths should be protected and enhanced. - Future development should be infrastructure-led, focused on brownfield regeneration wherever possible, and designed to improve the quality of life for existing residents rather than simply increasing the Borough's population. Economic growth, skilled employment and support for local and new businesses should receive equal or greater weight alongside basic housing provision.

The Local Plan should strike a better balance between environmental protection, economic prosperity and sustainable growth, ensuring Redditch remains an attractive place to live, work and invest.
The consultation strategy completely fails to address how the council will communicate the direct planning consequences of the 2028 local government reorganisation to the public. As Redditch transitions into a separate North Worcestershire authority, any future discussion or consultation regarding cross-boundary infrastructure, housing shortfalls, or threats to the Green Belt must be flagged to residents as an extraordinary strategic issue. The local community deserves total transparency regarding how these structural shifts might expose our borders to West Midlands urban expansion.
Consultation on a plan which has not been drawn up yet is meaningless. No independent audit process to ensure the plan reflects the wishes of residents not the personal agenda of individual dominant council members who are in leading roles in the council. More involvement from residents throughout the building of the plan, there is no point in spending money on a plan if it then gets rejected by residents. It should be the residents who have the final say on the various parts of the plan, not councillors who have their own agenda.
The HEDNA document is not in page order. The conclusion part runs from page 100+ then includes page 60+ which is not relevant to the conclusion.
This consultation has a total lack of dates (time scales) and also information to give an objective view on this consultation.
Consultation bodies and other stakeholders responses
Natural England – Annex A for advice relating to soils, protected sites, water quality and quantity, BNG etc. Annex B for Air Quality advice.
Worcestershire County Council – WCC are the Local Highways Authority and have responsibility for provision of education places across the county. We will continue to work with RBC as the local plan is developed and provide the relevant evidence bases and assessments to support plan development. This will include input into objectives, policies and infrastructure delivery plans through the existing collaborative arrangements.
Historic England – provided suggestions relating to the Sustainability Appraisal.
On behalf of developers and landowners responses
Tetra Tech obo Taylor Wimpey Strategic Land – whilst the statutory Duty to Cooperate is being phased out under the LURA 2023 and replaced by new alignment tests and Spatial Development Strategies, Redditch has established a history of supporting cross-boundary growth. Given Stratford is in the same HMA as Redditch, direct engagement should be sought with relevant stakeholders to ensure wider unmet needs are addressed.

RBC's response:

- 3.6.4 The relevant planning matters under the Council's control will be considered as the Local Plan progresses.

3.7 Responses to non-consultation questions

- 3.7.1 The table below summarises the responses received that do not specifically address one of the questions posed in the scoping document and underneath RBC's response.

Responses to non-consultation questions
<u>Summary of matters raised</u>
Consultation bodies and other stakeholders responses
Community Campaigner – historic environment related guidance for design codes, construction methods and contractors.
Community Campaigner – enhancement and protection suggestions and working with stakeholders for the betterment of designated and non-designated heritage assets.
Community Campaigner – enhancement suggestions for conservation areas and suggestions to improve the permission process.
Community Campaigner – appropriate improvements to historic buildings to combat climate change and provide economic benefits. Additionally, improvements to the outdoor environment e.g. maximising biodiversity, flooding and transport suggestions to mitigate climate change.
Community Campaigner – suggestions for the application process, and enforcement penalties for the deliberate neglect to historic buildings.
Forestry Commission – recommends that the Local Plan aligns with the NPPF to ensure the protection of irreplaceable habitats, such as ancient woodland and veteran trees. Additionally, trees play a crucial role in achieving BNG by providing habitats for wildlife, improving air quality, and contributing to climate resilience and therefore encourage the integration of tree planting and woodland creation into development plans to meet BNG requirements and enhance local biodiversity.
- Natural England: - The Nature Recovery Network (which aims to expand and connect wildlife habitats to support species recovery and deliver wider benefits such as carbon capture, air and water quality improvements and recreation etc.) does not stand out as a key driver. The plan should include policies and proposals for nature recovery. - The Plan should map local ecological networks, including buffers and wildlife corridors and set out policies and proposals to safeguard and enhance the network, including contributions through development where appropriate. - The scoping stage does not include the theme/issue of Local Nature Recovery Strategies (LNRS). The LNRS should inform the Local Plan by identifying the most appropriate locations for habitat creation, restoration and enhancement, where actions are likely to deliver the greatest benefits for nature and the wider environment; and supporting planners, developers, environmental organisations, communities, residents and businesses in targeting investment and activity to areas where they can make the greatest contribution to nature recovery. - All public authorities have a duty to conserve and enhance biodiversity. Local planning authorities in England are legally required to "take account" of Local Nature Recovery Strategies when developing Local Plans and making planning decisions. It is vital to consider how areas mapped within a LNRS and the Potential Measures proposed are reflected in the plan, including the extent of safeguarding which should be applied in those locations. - Your published Worcestershire LNRS should act as an essential spatial evidence-base that will be vital for identifying both potential areas of importance for biodiversity, the connectivity of ecological corridors and green infrastructure. It should inform development site assessments; biodiversity net gain arrangements; site allocations and associated

green infrastructure; while also enabling planning application determinations to be made. ○ Reference should be made to the LNRS within the site allocations policy wording when available. This is in order to develop clear policies and strategies that give developers an indication as to what the requirements are in relation to nature recovery such as whether there are any areas that are of particular importance to biodiversity (as identified within the LNRS mapping) or whether there are any associated biodiversity actions recommended for a site (these can be found within the LNRS strategy). ○ General advice for local plans provided at Annex A, standard advice for air quality impacts at Annex B, standard advice for soil and agricultural land quality at Annex C, and a separate local plans advice note.
• Canal & River Trust – The Trust has no waterways, assets or land interests within the area and as such we have no comment to make.
• National Grid Electricity Transmission – identified NGET assets in the Borough, including 6 overhead transmission lines, 3 electrical substations and NGET landownership all around Feckenham.
• National Grid Electricity Transmission – the security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.
• National Grid Electricity Transmission – the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.
• Active Travel England – expects Local Plans to be informed by a robust, data-led understanding of existing and future active travel and public transport networks, travel patterns and connectivity. Baseline work should establish current conditions, identify barriers and opportunities, and take account of planned transport infrastructure, services and policies. Baseline evidence should include: ○ Analysis of travel patterns and mode choice across different population groups and journey purposes. ○ Mapping of existing and planned active travel networks, public transport services and key local amenities, including schools, parks, play areas, food shops, healthcare facilities and community facilities; together with an assessment of their connectivity by active travel and public transport, informed by the DfT Connectivity Tool. ○ Identification of existing deficiencies in connectivity, accessibility and mode share, and opportunities for improvement over the plan period. ○ Identification of factors affecting the suitability and attractiveness of active travel and public transport, including route audits of networks serving potential strategic sites. ○ Review of Local Transport Plans (LTPs), Local Cycling and Walking Infrastructure Plans (LCWIPs), Rights of Way Improvement Plans (ROWIPs), Bus Service Improvement Plans (BSIPs), and other relevant local transport and infrastructure strategies.

- Active Travel England – Local Plan visions should be informed directly by baseline findings and adopt a vision-led approach, consistent with national planning policy, that prioritises sustainable travel from the outset. The vision should seek to maximise journeys made by active travel and public transport, reduce reliance on private car travel, and support wider health, equality, climate and environmental objectives.
- ATE expects vision statements to: Commit to growth that improves health, wellbeing, quality of life and environmental outcomes through increased use of active travel and public transport, including measurable increases in active travel and public transport mode share over the plan period.
 - Set clear and differentiated ambitions across settlements, neighbourhoods and accessibility contexts.
 - Define the connectivity and infrastructure standards expected of new development, which should be consistent with Manual for Streets, Inclusive Mobility and Local Transport Note 1/20: Cycle Infrastructure Design.
 - Promote equality of access, inclusive design and affordable travel choices.
 - Support environments that are safe, inclusive and accessible for all users, including women and girls.
 - Support carbon reduction and wider environmental objectives through reduced dependence on private motor vehicle travel.
- Active Travel England – evidence required to test options, proposed spatial strategy and site allocations:
 - Forecasts of active travel and public transport demand that are aligned with mode share targets and reflect the characteristics of different places, settlement types and accessibility contexts.
 - Demonstration that the proposed spatial strategy and site allocations have been informed by, and selected on the basis of, their ability to maximise access by active travel and public transport, minimise reliance on private car travel, and support mode shift.
 - Demonstration of how the proposed strategy will improve connectivity and accessibility to key destinations, and address identified constraints and deficiencies.
 - Identification of the active travel and public transport infrastructure and services required to support planned growth, together with evidence of their deliverability, including infrastructure requirements, costs, funding sources, phasing and implementation risks.
 - Assessment of the cumulative impacts of proposed development on active travel and public transport networks, including cross-boundary impacts where relevant.
 - Assessment of the contribution of the proposed strategy to public health, equality, inclusion, carbon reduction and wider environmental objectives.
- Active Travel England – The initial site assessment exercise should consider the extent to which potential allocations can support and deliver the Local Plan vision and a vision-led transport strategy. This should include an assessment of a site's ability to:
 - Maximise accessibility to key destinations by active travel and public transport.
 - Support high levels of active travel and public transport use and minimise reliance on private car travel.
 - Connect effectively to existing and planned active travel and public transport networks.
 - Support the delivery of sustainable transport infrastructure and services from an early stage of development.

○ Contribute to the creation of complete, connected neighbourhoods and wider health, equality, climate and environmental objectives. ○ Where new or improved transport infrastructure is required, priority should be given to active travel and public transport interventions before consideration of highway capacity enhancements, in accordance with the transport hierarchy.
• Worcestershire Regulatory Services (WRS) – has no comments in regard to nuisance and air quality at this stage.
• NHS Herefordshire and Worcestershire ICB – collaboration to ensure that: ○ The type and location of housing built, ensuring it is accessible and better meets health and care needs of local people, recognising the impact of the new housing on health and ensuring the ability for the new build occupants to carry out a healthy lifestyle. Noting the ageing population, increased prevalence of long-term conditions and disability. ○ Recognition of the impact of the increase in population new to Redditch Borough on health services infrastructure, ensuring that the developer mitigates the harmful impact created and that provision is included and mitigated within local plans, and where implications are detrimental there is a fair and consistent approach to developer contributions in accordance with Para 204 of the NPPF and Regulation 122 of the Community Infrastructure Levy Regulations 2011 (as amended).
• NHS Herefordshire and Worcestershire ICB – supports the delivery of housing suitable for older people; however, such development carries the highest per-capita healthcare demand of any housing type, and its impact must be assessed on that basis rather than on standard occupancy assumptions alone.
• West Midlands Combined Authority – the WMCA area has historically sought assistance in meeting housing and employment land needs from neighbouring areas with strong functional relationships reflected through transport connectivity, commuter, and migration flows. As the Scoping Document recognises, Redditch benefits from good road and rail connections into Birmingham. Whilst the emerging Birmingham Local Plan review intends to meet its own housing need, across the wider WMCA area a shortfall of approximately 28,000 homes remains in the current tranche of Black Country plans, and the latest internal analysis of local authority EDNAs suggests a substantial (est 475 ha) employment land shortfall across the WMCA area.
• West Midlands Combined Authority – it is requested that as the Redditch Local Plan evolves consideration is given to economic relationships with the WMCA area, particularly to the opportunities offered by the West Midlands Growth Plan and the West Midlands Strategic Employment Sites Study, which identifies the M42/M5/A435 Redditch and Bromsgrove as Opportunity Area 9.
• West Midlands Combined Authority – has recently commenced work on its Spatial Development Strategy, which will determine the scale and distribution of growth between its constituent local authorities over at least a 20-year period and guide their local plan reviews. A key component of the evidence base is the refresh of the Strategic Growth Study which covers the WMCA area as well as Redditch. Once the evidence base is completed, and its findings considered in the light of the new National Planning Policy Framework, the scale of housing and employment shortfalls in the WMCA area will become clearer.
• National Highways – The SRN in the vicinity of the Redditch Local Plan area is formed of the M42 Motorway approximately 6km to the north of Redditch town centre, which links into the M40 approximately 10km to the northeast of Redditch town centre. The A46 Trunk Road runs approximately 11km to the south of Redditch town centre. M42 junctions 2 and 3 presently perform within capacity during peak hours, however Local Highways Authority roads approaching the junction 3 circulatory experiences delays in both peak periods.

The M42 mainline westbound experiences consistent delay in the am peak typically extending to the M40 diverge.
National Highways – Sustainable residential and economic (employment) development remains a clear priority, and National Highway is supportive in terms of facilitating assessment and delivery of proposed growth, helping to meet both local and national government objectives.
On behalf of developers and landowners responses
The Planning Bureau Limited obo Churchill Living and McCarthy & Stone – advocates that the Local Plan should go beyond having a specific older persons housing policy that details locational requirements but instead the Local Plan should identify the older persons housing need and seek to allocate some sites to deliver such identified need.
- The Planning Bureau Limited obo Churchill Living and McCarthy & Stone – must ensure that when setting M4(3) standards that the accompanying viability assessment correctly assesses and includes additional cost for delivering this type of housing. M4(3) housing requires significant modifications to a typical unit beyond a M4(2) unit e.g. wheelchair circulation space. Given the level of likely need for older persons housing, the council should be careful not to prejudice delivery through the imposition of overly prescriptive and unnecessary criteria. - McCarthy & Stone recently undertook a wheelchair user survey of all of its developments to understand the proportion of residents that use a wheelchair. This identified that only 2.7% of residents of occupied flats use a wheelchair in their apartments whilst 3.2% of residents use a wheelchair in communal areas.
The Planning Bureau Limited obo Churchill Living and McCarthy & Stone – the viability of specialist housing for older people is more finely balanced than ‘general needs’ housing and we are strongly of the view that these housing typologies should be robustly assessed for viability and affordable housing separately to mainstream housing. Advice is provided on what should be noted within the viability assessment.
The Planning Bureau Limited obo Churchill Living and McCarthy & Stone – our experience is that older person’s housing proposals will not viably provide affordable housing on a typical development site given that unit numbers will not generate sufficient affordable housing for a registered provider to have interest in acquiring units; typical sites are too constrained to accommodate mixed management arrangements; and viability has consistently demonstrated that it is not financially feasible to provide ‘policy compliant’ affordable housing. The affordable housing & housing mix policies should be applied flexibly in respect of older persons housing or a reduced/exempt affordable provision.
Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – the standard method for calculating local housing need stipulates that RBC is required to deliver 462 dwellings per annum and given the extent of the (minimum) housing need, RBC will be obliged to deliver around 9,000 homes over the plan period.
Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – commentary and supporting documents to support the promotion of their site at Brockhill.
Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – RBC should meet its own needs in full, but the plan should maintain flexibility to assist neighbouring authorities where justified and the plan should not constrain supply. RBC is part of the Greater Birmingham and Black Country Housing Market Area and unmet housing needs have been identified within the GBBCHMA for a number of years. It remains that, across the wider HMA, a shortfall of 76,500 dwellings exists that should be met through cross-boundary cooperation.

• There is little by the way of contribution from authorities within the GBBCHMA towards meeting this need. The 'narrative' within the GBBCHMA is now that there is no unmet need, as revisions to the Standard Method has 'redistributed' this need to the authorities surrounding Birmingham and the Black Country. However, this overlooks that housing within the GBBCHMA has been under-delivered since at least 2017 when the BDP was adopted. It is not appropriate for this historical under-delivery to simply be 'wiped clean' moving forwards.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – As of April 2025, RBC can only demonstrate a housing land supply of 3.11 years. In terms of housing delivery, there were 174 net completions in the monitoring year 2024/25. This similarly represents a significant under-delivery, even when compared against the adopted Local Plan housing requirement of 337 dwellings per annum. Since 2011, only two years have met/exceeded the housing requirement. When utilising the data underpinning as yet unpublished 2024 HDT measurement, RBC only delivered 70% of the homes required over three year period and again is therefore subject to the presumption in favour of sustainable development.
• Savills obo Miller Homes Limited, Bellway Homes Limited / Woolsington One Limited and Persimmon Homes – the base date proposed for the plan period is not clear and should be clearly outlined in order for the plan to be in accordance with NPPF paragraph 16 (d). RBC should consider whether a longer plan period is necessary if larger scale developments such as new settlements or significant extensions to existing villages and towns are included.
• Tetra Tech obo Taylor Wimpey Strategic Land – commentary to support the promotion of their site at Mappleborough Green.
• Ridge and Partners LLP obo HarperCrewe – commentary to support the promotion of their site at Astwood Bank.

RBC's response:

- 3.7.2 A wide array of comments are summarised above that were not specifically answering one of the questions in the scoping consultation document. The relevant points will be considered as the Local Plan progresses.

Section 4: Next steps

4.1 Next steps

- 4.1.1 The responses received to this scoping consultation, together with responses from the Issues and Options consultation in the summer of 2025, will inform the preparation of the Local Plan and the Council's engagement strategy for future consultations.
- 4.1.2 There will be two further opportunities to help shape the Local Plan. The next consultation is the proposed Local Plan content and evidence consultation which is anticipated to be held in June 2027 for a minimum of 6 weeks. The final consultation is expected to be held in March 2028 for a minimum of 8 weeks which is a consultation on the full draft Local Plan before it is submitted for independent examination. The anticipated key milestone dates can be found in the Borough of Redditch Local Plan timetable, available at <https://www.redditchbc.gov.uk/redditchplan-timetable>.
- 4.1.3 The Council's website includes all information on the Local Plan; including the Local Plan timetable, notice of intention to commence local plan preparation, scoping consultation details, Gateway 1 self-assessment, evidence base, details of the previous Issues and Options consultation, and the privacy notice – <https://www.redditchbc.gov.uk/redditchplan>. This will be kept up to date throughout the preparation of the Local Plan, and any updates will be published there.