

Vision

There is a Vision in the Core Strategy that sets out how Redditch borough should be by 2026

1. What so you think about the vision for Redditch and what the area can achieve by 2026?

Rep No.	Name	Summary	Officer Response	Officer Action
R007	Cardew	A sensible vision	Noted	None
R008	Rose			
R009	Hughes			
R015	Batty			
R016	Rowell			
R019	Morris			
R021	Carpenter			
R029	Ostroumoff			
R036	Bourne			
R037	Bourne			
R038	Smith			
R040	Emms			
R042	Best			
R044	Allbutt			
R045	Smith			
R046	Lippett			
R049	Haigh			
R050	Haigh			
R051	Haigh			
R052	Haigh			
R054	Mason			
R057	Sinclair			
R061	Homer			
R063	Evans			

R076	Mason			
R082	Ramsay			
R101	Davies			
R116	Smith			
R118	Bartley			
R123	Mills			
R309	Moxon			
R310	Waldron			
R311	Hatton			
R312	Hatton			
R318	Bonham			
R343	Smith			
R344	Newburn			
R345	Flowers			
R346	Sims			
R347	Cruxton			
R348	Miller			
R349	Rose			
R350	Cale			
R351	Warby			
R352	Warby			
R354	Khoury			
R355	Kloetzli			
R356	Anderson			
R357	Bradshaw			
R381	Edmunds			
R383	Sinclair			
R012	Lewis	To further nurture our children, to provide space for them to grow. To identify areas which could be improved not removed. To	The vision aims to provide sustainable areas for growth. An Office Needs Assessment document has already been	None

		promote the use of existing office space that has been empty for many years and to further develop the town centre.	carried out which demonstrates the need for office space and that current vacant offices are not fit for purpose. This will also be updated in an Employment Land Review this year. The Core Strategy contains a number of regeneration initiatives to further develop the Town Centre	
R014	Sport England	Commendable vision, but due to economic climate there will be a greater reliance on the government & agencies rather than on the private sector	Not relevant	None
R018	Coombs	A reasonable vision, but wants more done to improve the negative perception of Redditch – give it some bling!	Overall aim of strategy is to do this	None
R020 R074 R084 R105 R109 R119	Baker Griffiths Cunningham Dewhurst Smith Danks	Agree with vision	Noted	None
R022 R068	Clark Hill	Reasonable vision	Noted	None
R023	Phillpotts	A logical vision	Noted	None
R024	Theobald	Sound and ambitious vision, but wants more of a focus on the town centre – encouraging niche shops and more restaurants	Policy 18 of the Core Strategy focuses on regeneration and the future of the Town Centre including priority projects such as	Continue to investigate and implement Town Centre Strategy priority projects and actions.

			a mix of uses and an improved café and restaurant offer	
R025	Barber	Vision well intentioned, but lacks distinctiveness. Considers the sentence “Green Belt matters because some changes to the Green Belt in Redditch may be necessary” too dubious. Feels with current plans to build on green belt the vision is contradictory and misleading in saying “To achieve this green strategy, Redditch’s character, biodiversity, water environment, open space and landscape will have been maintained and enhanced”.	Respondent has misinterpreted point in vision, it is necessary to ensure there are enough houses for the population of Redditch for the plan period, to do this it may be necessary to utilize some green space including Green Belt. In addition it is also essential to ensure that new development enhances and respects the green character of the Borough.	Amend wording to: “Green belt issues, as some changes to the Green belt in Redditch may be necessary”
R028	Lynn	Doesn’t want any more housing, wants to maintain countryside	It is not relevant or appropriate to amend the vision in this respect as housing strategy outlines the need for housing	None
R030	WCC	The Vision contains a paragraph relating to being sustainable. This is noted but should also reference the Worcestershire LTP3 and supporting policies, in particular the Development Control (Transport) Policy, the Smarter Choices Policy, the Transport & Climate Change Policy and the Transport and Air	This is not appropriate for the vision. There is a suitable reference contained in the transport policy.	None

		<p>Quality Policy</p> <p>Under the paragraph entitled 'Creating and Sustaining a Green Environment', the third bullet point regarding travel is noted. It is worth referencing the Worcestershire LTP 3 and supporting policies, which emphasise the importance of a balanced multi-modal approach which recognizes the role of each transport mode in helping to support economic growth, the environment and quality of life. Following the first paragraph on page 21 it is worth referencing the Worcestershire LTP3 and supporting policies, in particular the Accessibility and Development Control (Transport) policies which highlight the importance of delivering highly accessible new developments if use of walk, cycle, bus, rail and high occupancy car is to be maximized.</p> <p>Agree with paragraph regarding 'Sustainable places to live to meet our needs'.</p>		
R034 & R035	Sharpe & Evans	Concentration & amount of development is excessive and	The amount and location of development is dealt with in	None

		Redditch can not support it.	housing and employment related policies	
R053	Timothy	Concerns over more development at Brockhill when there are so many problems with existing housing.	The amount and location of development is dealt with in housing and employment related policies	None
R055	Wakeman	Only concern relates to the erosion of green belt and setting a precedent for more development to extend further into green belt	The vision sets out that change to green belt boundaries may be necessary and this will be informed by a green belt review. As part of the review, Officers agree that the boundaries would need to be defensible and long term.	None
R059	Watkiss	Difficult to form an opinion when so vague. Positive, providing a future plan for the Borough, but its implementation will determine its success. Vision discusses sustainable modes of transport – existing cycling routes are dangerous, blocked by parked cars.	Officers agree that the implementation of the vision will need to be undertaken to achieve it. An Infrastructure Delivery Plan will highlight where there are significant issues, particularly with cycling routes and implementation using recently gained funding. Issues with parked cars are a traffic enforcement issue. The Core Strategy cannot deal with this	None
R065	Porteous	Well thought out, but data could be more up to date	Although there is no data in the vision, data used throughout the Core Strategy is up to date	None
R067	Worcs Wildlife Trust	Support the vision, in particular 'Creating and Sustaining a Green	Noted	None

		Environment'. Significant progress must be made in terms of biodiversity and GI throughout the plan period and the vision helps to embed this.		
R080	White	Not a good vision. Redditch needs a period of consolidation. The resources do not meet the needs of existing residents.	The Local Planning Authority has a duty to plan for the area. Without the strategy vision, Redditch would be at risk from inappropriate development. An Infrastructure Delivery Plan will make provision for the infrastructure necessary to make development acceptable	None
R095 R092 R172	HCA Gallagher Estates Heaselgrave	Supports the vision	Noted	None
R096	Griffin	Will create a vast urban sprawl without the necessary infrastructure to support it	Infrastructure provision is mentioned in the vision	None
R100 R124	Selves Hughes	The population of Redditch is decreasing, therefore we have enough houses	This is not related to the vision. The population is not decreasing	None
R104 R162 R174	Green Campbell Bedford- Smith	Generally a positive, achievable vision	Noted	None
R106	Jobson	Vision reflects highest housing figures and lacks flexibility	The Core Strategy will always look at worst case scenario. In going forward the strategy will	None

			look at flexibility	
R108	Hawkins	Great (esp. town centre redevelopment) – provided the funds are available	Noted	None
R113	Stallard	Too ambitious	The Council will have to prove that it can be delivered through a Delivery Plan.	None
R115	Hayfield	Lack of major high tech companies. No development regarding river arrow.	Lack of high tech companies is dealt with in the Employment Land Review. This is also in the Creating a Borough where Businesses can Thrive strategy area	None
R117	Cotton	Vision reflects highest housing & employment figures, suggesting decisions on numbers have already been made	Elsewhere in the Core Strategy makes it clear that this isn't the case	None
R120	Styler	Population of Redditch has trebled in the last 50 years – enough is enough.	Not realistic to plan for no population growth	None
R121	Styler	Having lived in Redditch whole life and seen Greenlands, Lodge Park & New Town built, I think there has been enough development.	Not realistic to plan for no population growth.	None
R122	Carter	Generally agree, but need to consider the impact on Feckenham etc through flooding.	This is important but is not relevant to the vision; this issue is considered through the Strategic Flood Risk Assessment Level 2.	None

R128	Natural England	<p>Fully supports the 'green' aspirations – would like reference to the GI Strategy. Suggests we combine points 2 & 4.</p> <p>Point 3 – sustainable travel... might be better placed in 'Sustainable Places to Live to Meet our Needs'</p> <p>GI should also be mentioned in 'Promoting Redditch's Community Well-being'</p> <p>Final sentence of C&SAGE on delivering infrastructure should include GI.</p>	<p>Agree</p> <p>Officers consider it more appropriate for sustainable transport to be perceived as continuing to sustain Redditch's green environment</p>	<p>Amend wording to: "The natural environment and open spaces, as these are a unique feature of Redditch which give the urban area a rural atmosphere;"</p> <p>Amend wording to: "New and enhanced leisure provision and GI will achieve healthy communities as well as provision for healthcare facilities and enhancements to existing healthcare."</p> <p>Amend wording to: "Sustainable modes of transport will be supported and delivered as well as the infrastructure and green infrastructure needed to support planned development"</p>
R173	Coombes	<p>Good in theory. The detail should reflect what the current population wants.</p>	<p>Cannot produce a plan that everyone will be happy with – needs to be deliverable, achievable and reflect the most up to date evidence (advice from</p>	<p>None</p>

			PPS12)	
R176 R177	Styler Styler	Council should be careful to avoid turning Redditch into a big urban sprawl. The town suffered enough during the New Town years	Noted	No change
R178	Styler	The vision should be for a better place to live	Each of the strategies aims to achieve this	No change
R306	Moss	How can RBC state that 'Redditch will be greener by 2026' when their first action is to destroy and develop the Green Belt?	The Green Infrastructure Strategy encompasses a number of elements, one of which is the green belt. The Local Planning Authority have a duty to plan for the area, without the strategy vision, Redditch would be at risk from inappropriate development.	No change
R314	Rood	Sensible, but Successful should include; higher educational standards and a skilled and motivated workforce	Reference to a skilled and motivated workforce is in vision. Educational standards are included in Policy 16 – diversification of the Economy.	No change
R358	English Heritage	Welcome the overall aspirations of the vision, in particular the specific consideration given to protecting & enhancing the historic environment. Suggest a minor amendment (page 22) to reflect terminology in PPS5: '...the heritage assets of the borough will be conserved and enhanced.'	Agree	Amend wording to: "To deliver the Historic strategy, the heritage assets of the borough will be conserved and enhanced."

R379	Scottish Widows	Supports the vision as drafted, but appears to overlook the role of the private sector under 'shared responsibility'	This relates to the Sustainable Community Strategy (SCS) Vision	Amend layout/formatting of document to make clear which is the SCS & which is the CS vision
R382	Redditch LSP	The new SCS vision needs to be inserted. Question whether New and enhanced leisure provision will achieve healthy communities as well as provision for healthcare facilities and enhancements to existing healthcare" is an accurate statement to make. Little information regarding the impact that planning and the CS can have on health. Suggest that reference should be made to the use of Health Impact Assessments."	Agree In the remit of planning, the statement made in the vision & the policies that follow will achieve this aspect of the vision. Agree to principle of the ref, but will be inserted in strategy policy rather than vision.	Replace previous SCS Vision with: "The Redditch Sustainable Community Strategy is built around a shared vision for the Borough. It is envisaged that by 2026: 'Redditch will be successful and vibrant with communities that have access to good job opportunities, good education, good health and are communities that people will be proud to live and work in."
R384 R385 R386 R387	McQuaid McQuaid McQuaid McQuaid	Redditch has a number of social challenges: - Highest unemployment rate in Worcestershire, with two areas where unemployment amongst	Development provides opportunities for improvement to things like this, such as the policies we have in the "Creating a borough Where Businesses can Thrive" Strategy area.	No change

		<p>young people is the worst in the country. - Schools have the lowest levels of achievement</p> <p>Need a vision for improving these issues that can be implemented and is working before we attract new people to the area and to encourage people to stay in Redditch. Only then can we provide an environment for people to thrive.</p> <p>These problems will be harder to solve with more people, we should discourage new people from coming to live in Redditch until we can support local people.</p> <p>National (housing?) targets are inappropriate for a town that is so far below the national average on so many important social measures, affecting quality of life and expectations that Redditch currently offers.</p> <p>Improving these issues before any other action is taken is more important than ever as reduced spending is likely to disproportionately affect Redditch</p>	<p>LPA have a duty to plan for the area, without the strategy vision, Redditch would be at risk from inappropriate development.</p>	
--	--	---	---	--

		to further disadvantage residents.		
R389	Sterry	Brockhill East & West – the strategy appears to disregard the green belts surrounding the town – this is seen as an attempt to gain favour with developers. Green belt areas have been designated for a reason and should not be revoked without a full consultation. Developments cannot be allowed to proceed at the expense of the countryside.	The vision sets out that change to green belt boundaries may be necessary and this will be informed by a green belt review. As part of the review, Officers agree that the boundaries would need to be defensible and long term.	No change
R390	Blakeway	Redditch is located within a highly sensitive landscape with the town’s growth nearing its natural limits. Need to take note of the point “Nearing its natural limit” (your statement) Need to conserve what we have and not look to bring in more population and development that brings more problems. Redditch, like a family should not have more dependants than we can afford or cope with. The report has the unusual undercurrent of continual growth – we know where that has got the country – into debt from living beyond our means. This report is sending Redditch the same way.	The Local Planning Authority have a duty to plan for the area and to meet the needs of the population including the housing needs, without the strategy vision, Redditch would be at risk from inappropriate development. In terms of landscape, it is agreed that its sensitivity is an important consideration for the Core Strategy, hence its reference.	No change

		Conservation – not construction is what's required.		
--	--	--	--	--

Objectives

To deliver the Vision a set of 12 Objectives (see Core Strategy, page 23) have been developed that reflect the aspirations of the Vision and provide direction for the Core Strategy

2. Are these objectives the right objectives to make sure that Redditch achieves the Vision?

Rep No.	Name	Summary	Officer Response	Officer Action
R007	Cardew	Agree with all apart from No. 9. Suggested should be replaced with: “No houses, or at most a limited number of houses (no more than 1,000) up until 2026, should be built, to reflect local need for Redditch residents only. The majority of these should be ‘affordable’, built in sensible locations close to the City Centre, with good road/rail infrastructure, close to employment sites and supporting infrastructure.”	This suggested objective does not reflect the locally derived evidence base and would have severe detrimental effects on the economic sustainability of the Borough. As set out in the Core Strategy, the percentage of those houses to be affordable must be set at a viable level so that development isn’t stifled. It is not feasible to locate this residential supply in Town Centre locations as there are competing demands from Town Centre uses and a very limited supply of suitable sites in Redditch, however the principle of housing being well related to employment areas and to other services and facilities has always been supported.	None
R008	Rose			
R009	Hughes			
R015	Batty			
R016	Rowell			
R019	Morris			
R020	Baker			
R021	Carpenter			
R022	Clark			
R023	Phillpotts			
R029	Ostroumoff			
R036	Bourne			
R037	Bourne			
R038	Smith			
R039	Allen			
R040	Emms			
R042	Best			
R044	Allbutt			
R045	Smith			
R046	Lippett			
R049	Haigh			
R050	Haigh			

R051	Haigh			
R052	Haigh			
R054	Mason			
R057	Sinclair			
R061	Homer			
R063	Evans			
R065	Porteous			
R068	N Hill			
R074	Griffiths			
R076	Mason			
R082	Ramsay			
R101	Davies			
R109	Smith			
R116	Smith			
R118	Bartley			
R123	Mills			
R309	Moxon			
R310	Waldron			
R311	Hatton			
R312	Hatton			
R318	Bonham			
R343	Smith			
R344	Newburn			
R345	Flowers			
R346	Sims			
R347	Cruyton			
R348	Miller			
R349	Rose			
R350	Cale			
R351	Warby			
R352	Warby			

R354 R355 R356 R357 R381 R383 R384 R385 R386 R387	Khoury Kloetzli Anderson Bradshaw Edmunds Sinclair McQuaid McQuaid McQuaid McQuaid			
R012	Lewis	Objectives do no consider the requirements of current residents. The town centre should have more support & development	The evidence base indicates what the requirements are that we have to plan for, and the objectives reflect this. Officers agree, the town centre could accommodate more development than originally proposed and the objective needs to reflect this	Amend objective 8
R014 R024 R059 R084 R105 R108 R119 R122 R162 R172 R174	Sport England Theobald Watkiss Cunningham Dewhurst Hawkins Danks Carter Campbell Heaselgrave	Agree with objectives	Noted	None

R380	Bedford-Smith Jarrett			
R018	Coombs	Accept we need to provide homes for future generations. Need to improve the image of Redditch, making it a place that people want to live/visit.	This is what the objectives aim to achieve	None
R025	Barber	Feels the objectives are undermined by the proposed development esp. objective 4 - great objective, but made meaningless. Considers green infrastructure network sentence to be meaningless babble and disagrees with objective 9 to provide a range of housing... when it means building on green field and belt sites.	Access to the green space will be enhanced through the proposed development. Objective 9 aims for a range of types of housing to be provided which is considered appropriate	None
R028	Lynn	Obj. 1 – Agricultural and landscape value of Brockhill East green belt is a welcome sight into the town and should be protected under national policy. Brockhill can provide habitat for wildlife. Considers wildlife and landscape to be particularly important. Land between Sainsbury's island and cemetery should not be developed.	This is site focused and not related to the objectives. Brockhill East would not meet the criteria for national protection. There is no evidence of protected species habitats etc in this location.	None

R030	WCC	Agree with objective 5 regarding travel. Worth referencing the Worcestershire LTP3 and supporting policies, which emphasise the importance of a balanced multi-modal approach which recognizes the role of each transport mode in helping to support economic growth, the environment and quality of life.	There is a suitable reference contained in the transport policy. Not appropriate for the objectives.	None
R034 & R035	Sharpe & Evans	Dev will destroy AONB and wildlife Insufficient infrastructure to support new dev. Increased risk of flooding	There are no AONB designations in Redditch. There is nothing in the core strategy or any of the sites that will destroy species or habitats. Although the respondent has not pinpointed which location concerned about, the SFRA has not identified any specific issues. The Plan would be accompanied by an Infrastructure Delivery Plan.	Prepare an Infrastructure Delivery Plan
R041	Patten	No – they are outdated. Quality of life for current residents is more important than providing more houses.	It's not clear how these objectives are outdated. Provision of housing contributes towards quality of life so they are mutually exclusive. Both existing and potential new residents are priorities.	None
R042	Best	Agree with all apart from No. 9. Do not want to see Redditch	Housing targets will need to be based on Redditch's natural	None

		covered in concrete. Housing targets should reflect the town's natural growth only.	growth in principle the idea of planning to meet what requirements Redditch residents generate for housing is sound, however this is a high figure, and doesn't take into account other factors.	
R043	Rixon	<p>Obj. 1 – will be unable to achieve this by building houses on green field/belt land. Will also result in unmanaged green areas.</p> <p>Obj. 2 – bringing more people into the town will increase carbon levels, new people will only care about cheap housing & not about the town or its history.</p> <p>Obj. 3 – encourage existing residents to recycle/reuse more.</p> <p>Obj. 4 – Man made parks do not make up for losing fields. By building on them, educated people & those who can afford to will move out of Redditch.</p> <p>Obj. 5 – Recent bus service reductions force people to use cars & contradict this objective.</p> <p>Obj 6 – Good to visit during the day, but unsafe at night due to drinking culture, stabbings and no. of drinking establishments.</p>	<p>Where strategic site – could encourage management through the CS and potentially secure financial contributions for management. Also no reason to question deliverability of the sites suggested in the strategy</p> <p>Agree – the CS doesn't encourage migration into the town and the BC successfully argued for its settlement of sustainable development designation to be removed from the RSS.</p> <p>Obj 3 – this is considered in Policy 1 – Climate Change</p> <p>Obj 4 – Ref to GI Strategy</p> <p>Obj 5 – continue to encourage sustainable transport</p> <p>Obj. 6 - CS attempts to enhance night time economy and planning has a limited role in how it can encourage interaction of uses to</p>	

		<p>Obj 7 – Must show anti-social behavior is not acceptable.</p> <p>Obj 8 – Town centre must be a safe place for everyone. Events and markets will encourage more use of the town centre, while pubs discourage visitors.</p> <p>Obj 9 – Fill existing vacant homes before building new dwellings.</p> <p>Obj 10 – Too many vacant offices – should be filled before building new ones.</p> <p>Obj 11 – Shouldn't build on land that has the original Red Ditch.</p> <p>Obj 12 – Hospital needs support, should be accessible.</p>	<p>minimize social issues</p> <p>Obj. 7 – This is not directly a planning matter but CS does focus on safety and anti social behavior in Policy 23 High Quality and Safe Design.</p> <p>Obj 8 – Agree see above. The Town Centre Strategy also aims to encourage these kinds of activities.</p> <p>Obj. 9 - LPA have a duty to plan for the area, without the strategy vision, Redditch would be at risk from inappropriate development.</p> <p>Obj 10 – See above. In addition, vacant offices are very often not fit for purpose, but the Core Strategy encourages their redevelopment for economic purposes.</p> <p>Obj. 11 – The Red Ditch is important to preserve and issues a physical constraint to dev't in any case</p> <p>Obj 12 – Policy 31 Land to the rear of the Alexandra hospital, Policy 26 – Health facilities both ensure support for the hospital and its access.</p>	
R053	Timothy	No, disagree with objectives	Noted	None

R124 R176 R177	Hughes Styler Styler			
R055	Wakeman	No opinion on objectives.	Noted	None
R064	Diocese of Worcester	<p>Support objectives, particularly the emphasis on environmental concerns. It could be the case though that these objectives could have a negative impact on the development of a flexible and responsive community e.g. seeking to reduce travel restricts the potential for employment opportunities.</p> <p>To maintain a vibrant and attractive economy more effort to attract appropriate, high value, sustainable employment. Obj. 10 is the only one that addresses this and this needs to be strengthened.</p> <p>Obj. 12 should set out to reduce the number of people who need health treatment and increase the no. of people who live healthily. Tackling people's ill health is only part of the picture. Should be promoting good health and preventing ill health.</p>	<p>The Core Strategy is not restricting travel, but in its allocations attempt to reduce the need to travel by unsustainable modes of transport, and also encourages dev't to help people make the shift to more sustainable modes</p> <p>Objective 10 is as strong as it can be to support and attract appropriate, high value, sustainable employment.</p> <p>Policy 26 – Health aims to reduce the number of people who need health treatment and increase the no. of people who live healthily.</p>	None
R067	Worcs Wildlife Trust	Agree with Objectives, particularly pleased to support objectives 1, 2	Noted	None

		& 3.		
R092	Gallagher Estates	Agree with all, but further consideration on Obj. 9 (see other comments on cross boundary/joint working etc)	It is more appropriate to have a separate objective as cross boundary issues include more than housing.	Amend Objective 13 if this development is appropriate
R073	The Rowney Green Association	Supports objectives, particularly 1, 4, 6 & 11. It is important to protect and enhance the wildlife corridor of the River Arrow & its tributaries.	Noted	None
R096	Griffin	Will set the precedent of creating a corridor of development linking Redditch & Bromsgrove. Open space, habitats, roads, schools & health facilities are poorly acknowledged.	Green Belt policy established between the two settlements would maintain the settlements as separate entities. Objectives 1, 5, 10 and 12 cover these issues.	
R100	Selves	Disagree with objectives – Redditch is not job rich. An increase in population will mean an increase in unemployment	Officers are looking at how the population will affect the job take up in the Strategic Housing Market Assessment, which might change the objectives in the future before the next version of the Strategy is presented to members.	None
R103	Smith	No mention of green technology/solar panels/environmental considerations in the proposals. All the concrete causes problems with surface water drainage.	Objective 3 broadly covers this, but more detail in the Creating and Sustaining a Green Environment Strategy area.	

R104	Green	More can be achieved in respect to heritage and tourism – currently too “timid.”	Notes on heritage & tourism supplied, but not core strategy related.	None
R106	Jobson	Irreversible decisions will be made in the early years. Planning decisions cannot be reversed if found to be wrong	Noted	None
R113	Stallard	Agree, with reservations	Noted	None
R115	Hayfield	Disagree, where will the funding come from?	Various sources	None
R117	Cotton	The government has already decided on housing numbers, you are consulting on something that has already been decided.	NPPF requires that the Local Planning Authorities determines their own growth levels	None
R126	Environment Agency	Suggest an amendment to obj. 1 to include a reference to enhancement (due to deterioration since the New Town was built, inc culverting and straightening of watercourses) i.e. ‘...opportunities for enhancing biodiversity value, wildlife and ecological connectivity...’	It is not clear where the deterioration is, however accept the merit of the additional word.	Amend the wording of Objective 1 to: ‘...opportunities for enhancing biodiversity value, wildlife and ecological connectivity...’
R128	Natural England	Support the objectives, but would recommend amending obj. 1 on GI to reflect its multifunctional value.	Agree	Amend the wording of Objective 1 to: “To maintain and provide a high quality natural, rural and historic environment with a multifunctional Green Infrastructure

				network....”
R173	Coombes	Good in principle, but don't understand how e.g. obj. 4 can be achieved when parcels of green land are being sold for development.	The green strategy is about more than just Greenfield sites being used for development.	None
R178	Styler	Buildings more homes will erode quality of life in the town.	There is a balance to be struck between providing housing and using greenfield land for development, both of which can affect quality of life.	None
R266	Dallaway	A number of the objectives contradict plans to develop Green belt land (1 st , 4 th , 5 th & 11 th)	The green strategy is about more than just Green Belt	None
R314	Rood	Agree with all except objective 9 – this should be replaced with something along the lines of <i>“Given the uncertainty of demographic populations house building will be restricted until a proven need is demonstrated and will be prioritized in locations close to the town centre where suitable infrastructure of all types already exists.”</i> Obj. 10 – consider adding “In particular, steps will be taken to attract inward investment, focusing on overseas companies looking for a UK base, together	This is not appropriate, the Core Strategy will need to make the decisions locally about the growth levels. Objective 10 is as strong as it can be to support and attract appropriate, high value, sustainable employment. Agree it can be strengthened.	Amend working of objective 10 to: “To have a strong, attractive, diverse and enterprising economic base with sufficient employment land, including Strategic Sites. Redditch will have employees with higher skills levels with strengthened links between business and education;”

		<p>with those involved in nascent technologies and service industries so as to increase and enrich employment opportunities” Without new employers in new business areas I consider employment opportunities are likely to shrink.</p> <p>Note no mention of education in objectives. Believe that three-tier system in Redditch is partly responsible for poor educational achievement. Recognise that it is a county matter, but would suggest adding a further objective along the lines of “To work with and support other agencies in improving the structure and quality of educational opportunities open to young people in Redditch so as to increase their level of attainment and enhance their life opportunities”.</p>		
R358	English Heritage	Broadly support objectives, in particular the inclusion of the HE under obj. 1. Objectives 4 & 6 also have potential to link to the sustainable management of the Borough’s HE and heritage assets.	Noted	None

R379	Scottish Widows	Broadly supports 12 objectives. Critical that any leisure development at the Abbey Stadium is consistent with objective of enhancing the vitality and viability of existing centres. Important to recognise the finite demand for commercial leisure uses in the Borough such that the priority of delivering such uses in the TC is not undermined.	Agree leisure use in the TC needs to be considered by can't see any necessary change to objectives. The objectives are broad enough to allow leisure uses in preferred town centre locations.	None
R389	Sterry	Disagree with objectives. Should be identifying all brownfield sites that can be re-developed before building in the green belt.	Agree that sites within the urban area are more preferable and the Council has pursued this as demonstrated in the SHLAA.	None
R390	Blakeway	Obj 1. Biodiversity is the degree of variation of life forms within a given ecosystem, biome, or an entire planet. Biodiversity is a measure of the health of ecosystems. Greater biodiversity implies greater health. Biodiversity is in part a function of climate. In terrestrial habitats, tropical regions are typically rich whereas polar regions support fewer species. I do not see how you are to improve on this if you intend to further construct buildings with concrete and brick and timber over greenbelt. Obj 2.	The Creating and Sustaining a Green Environment section of the Core Strategy covers these issues. Planning and design and access statements also include this level of detail in individual applications. Changes to Green Belt boundaries may be necessary and this will be known once the development targets as known. This consultation is an opportunity for all to have their say. Objective 9 is set when none of these issues provide a context to the amount of demographic need. The Core Strategy does	None

		<p>Working towards doesn't mean anything - stop making political statements and start making actual statement about not building with materials that damage the planet, i.e. (concrete/brick). The most environmentally damaging materials on the market not to mention the energy they need to be manufactured. State what type of materials would be used in your strategy to exceed national standards. Obj 3. Best way to do this is live within our means. Obj 4 & 5 Do not build on Green Belt - we are already a small borough with too many buildings .you will not be happy until this area ends up like inner city Birmingham. Obj 6. Improve the Redditch natural environment, woods, parks etc - I do not know anyone who want to visit West Bromwich to see it wonderful landscapes -. Never mind you need to earn more money from visitors - try to live within your means - its always about money. Stop wasting money on your expensive consultants and listen to the</p>	<p>already include reference to the need to use recycled materials. With objective 4 and 5 the green belt development would only be required in exceptional circumstances however the strategy demonstrates that those exceptional circumstances existed. In relation to objective 6 the objective sets out the position to require sufficient protection for natural environment. Comments in relation to objective 7 and objective 8 do not constitute planning matters which this core strategy can resolve. Comments on objective 9 are somewhat correct in that it is for the Local Authority to determine its development targets. The site mentioned by the respondent was included in the Core Strategy as a potential strategic site for redevelopment. There is a sand and gravel deposit at Brockhill West Strategic Site. Officers are currently following this up.</p>	
--	--	---	---	--

		<p>constituency. Obj 7. To reduce crime the existing communities need to take part in making people with unacceptable attitudes change - Publish pictures of lawbreakers and show decent people where they live to allow respectable citizens to see where the danger is and who they are. Heavy fines and longer jail sentences. We have tried being bleeding heart liberals and now we have more crime than ever.</p> <p>Obj 8. Keep is simple - make the community become more involved. Everybody in Redditch should spend some of their time keeping their own area clean and tidy. Obj 9. Your data for these needs are incorrect based upon the soon to be disbanded RDA who in turn developed the RSS. This is a central government tool to make borough councils build/construct more to line the pockets of construction companies through profits of new home sales and to allow councils received fiscal revenues from council tax and incentive bonuses bribes from central government in</p>		
--	--	--	--	--

		<p>the form of "The New Homes Bonus". No more construction to the green belt. People of Redditch overwhelmingly reject this plan to build more homes, industrial sites and roads. Obj 10. You have many building's that need to be redeveloped such as the derelict structure adjacent to the railway station - been like it for years but you have taken no steps to sort this - and right by the station for commuting purposes. What type of industry are you thinking of bringing to town, open cast mining adjacent to again Brockhill (We do seem to the centre of attention at Brockhill) See you own report or another storage facility. These do not bring income into the country. Obj 11. No more construction to the green belt. Obj 12. No more construction to the green belt.</p>		
--	--	--	--	--

Proposals Map

Rep No.	Name	Summary	Officer Response	Officer Action
R129(A)	Persimmon Homes	The RPDCS does not make it clear whether it will continue to rely on the adopted Local Plan No.3 Proposals Map or whether a new proposals map will be prepared in line with the CS	Agree. RBC will make reference to a Proposals Map in the next CS draft and produce a new Proposals Map	Prepare Proposals Map in preparation for the Submission version of the Plan and alter CS wording to reflect this
R129(B)	Persimmon Homes/ Miller Homes/ S&RD	<ul style="list-style-type: none"> - The proposals map should be revised and republished as part of the CS, defining the development area of the Strategic Sites - The Brockhill East development area should be divided into two discrete areas separated by the railway line - There are some discrepancies regarding the extent of the identified Brockhill East Strategic Site. Attention should be given to the inclusion of appropriate land, currently excluded from the site which will contribute towards the overall Green Infrastructure in the greater Brockhill area i.e. 	<p>Noted, see Action above</p> <p>The Brockhill East strategic site and its boundary will be revisited through further policy preparation</p> <p>Noted. See above</p>	<p>See above</p> <p>Reconsider strategic site boundaries through policy updates</p> <p>See above</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>community woodland and the Red Ditch corridor, which should be included as open space</p> <p>- There are some discrepancies regarding the extent of the identified Brockhill West Strategic Site. Attention should be given to the extent of the developable area i.e. exclusion of community woodland and land south of Brockhill Drive</p> <p>The Key Diagram should not show policy designations outside the Borough Boundary as this is a matter for the Core Strategies in neighbouring districts. The diagrammatic representation of Brockhill East should be increased in size to indicate that the proposal extends up to the Borough boundary and a separate symbol inserted for land east of the railway as a further strategic site</p>	<p>The Brockhill West strategic site and its boundary will be revisited through further policy preparation</p> <p>The Key Diagram is indicative and will be replaced by an appropriately detailed proposals Map</p>	<p>See above</p> <p>Prepare Proposals Map in preparation for the Submission version of the Plan</p>

Rep No.	Name	Summary	Officer Response	Officer Action
R006	M Bish	We need agricultural land to provide local food, which is essential to meet 'green targets' and reduce mileage for transporting food.	The Borough Council do manage and support the provision of allotments to enable residents to produce local crops. The quality of land and whether it is needed for agricultural purposes has been considered when selecting development sites.	None.
R030	Worcestershire County Council	Bullet point one i. is noted; suggest referencing that this approach is consistent with the overarching Worcestershire LTP3 and in particular the LTP3 Transport & Climate Change Policy, the Development Control (Transport Policy), the Smarter Choices Policy and the Accessibility Policy.	Officers agree with the importance of LTP 3, reference will be made in the introductory chapter of this section to highlight the importance of LTP3 and that policies are in accordance with this plan.	Amend introductory chapter to include reference to LTP3.
		Page 27 – Reasoned Justification. With regard to the reference to low carbon vehicle infrastructure, provision for this is welcomed as part of an integrated approach.	Support noted	None.
R038	William Davis Ltd	Clarification is needed on point (iii) and the requirement that new	The policy requires that all aspects of the CFSH are	None.

		<p>residential development must meet national standard of the Code for Sustainable Homes. It is unclear whether the policy is referring to the energy element of the code to which the national timetable relates or other parts of the code as well.</p> <p>If the requirement is to meet energy part of the code then there is no objection (as this is already enforced through Building Regulations). However requiring additional code requirements would be highly constraining on housing delivery in the borough through increased building costs. Requiring additional code requirements would also be inconsistent with national planning policy as such requirements should be the subject of viability testing (PPS 1 is quoted which requires evidence that delivery is viable). As viability testing has not been completed there is objection to requirements.</p>	<p>implemented in line with what is already requested for Government Funded housing schemes. It is a key objective of the emerging plan to ensure all new development in the Borough is of a high standard and reduces its environmental contribution by working towards being zero carbon. There is no intention to constrain housing delivery however a balance must be sought between housing delivery and the standards of such housing.</p> <p>If applicants believe their proposal will be unviable due to such requirements they must be able to demonstrate this and engage early with the Development Management team to ensure a suitable, sustainable scheme can be delivered. This is outlined in the policy.</p>	
R067	S Bloomfield OBO Worcestershire Wildlife	Support for this policy but recommend that it includes a comment on valuing and use of ecosystem services to provide	Reference is made to the link between this policy and the Green Infrastructure policy, however the Reasoned Justification will be	Amend Reasoned Justification to: <i>“The provision of Green Infrastructure is the</i>

	Trust	mitigation and adaptation opportunities through the natural environment. While this is picked up in the GI Policy it would bear repeating it here.	amended to include detail on that ecosystems and the natural environment provide a tool for mitigating and adapting to climate change and this should be considered in new development scheme and projects relating to the Core Strategy.	<i>most sustainable way to ensure proposals can adapt to a changing climate. Ecosystems and the natural environment provide a tool for mitigating and adapting to climate change and this should be considered in new development schemes and projects relating to the plan (see Policy X for more information)."</i>
R095	D Charmbury OBO Homes & Communities Agency	Support reference to specific tools such as the Code for Sustainable Homes and the West Midlands Sustainability Checklist.	Support noted.	None.
		Support the focus on retrofitting of existing housing stock.	Support noted.	None.
R125	K Ventham OBO Barton Willmore OBO Barratt Strategic and Taylor Wimpey UK Ltd	Reference to standard being sought in line with national target is supported, it is however considered that specific reference to, for example, the Code for Sustainable Homes within the policy is inflexible. As the plan is long term the Code for Sustainable Homes may be replaced/ updated by alternative	Although the point is noted it is considered essential to give readers a clear direction about what standards are expected from new development within the Borough. In this instance this requires reference to the Code for Sustainable Homes. However an amendment will be made to the Policy which refers to any other	Amend Policy to state <i>"Code for Sustainable Homes (or any other national scheme which supersedes it)."</i>

		legislation and as such direct references should be avoided.	national scheme.	
		As the Code for Sustainable Homes is sought through alternative legislation, it is not considered that there is a need for an express reference within this policy [quote from Para 30 of PPS1 provided].	The Code for Sustainable Homes is not yet mandatory for all new developments (only those with Government funding) therefore this local requirement brings all new housing in Redditch to the same standard.	None.
		In accordance with the climate change supplement to PPS1, the Council are required to have an evidence based understanding of the local feasibility and potential for renewable and low carbon technologies in their area. In addition, they should ensure consistency with housing and economic objectives. We are not aware of any work which Redditch have undertaken with the industry to determine the potential impacts of this policy.	The evidence base for the emerging plan is still on-going all evidence that is required will be in place for the submission version of the plan.	None.
R126	R Whiteman OBO Environment Agency	<u>Sustainability Checklist</u> The West Midlands Sustainability Checklist is considered more useful to inform 'issue and options' not detailed requirements. We would query this approach as a tool for	It is acknowledged by the Council that the West Midlands Sustainability Checklist has ceased to operate and therefore its reference will be removed from the Policy. .	None.

		delivering the objectives of the DPD.		
		If the Council wish to pursue a checklist it is recommended that a locally tailored version is produced. This needs to be secured in an appropriate way i.e. linked to a policy within a DPD (look at Shropshire Councils Sustainability Checklist as an example).	As above – it is acknowledged by the Council that the West Midlands Sustainability Checklist has ceased to operate and therefore its reference will be removed from the Policy.	None.
		The Policy refers to the Code for Sustainable Homes and BREEAM, however we recommend the inclusion of a specific target within the DPD for example a water efficiency target linked to the Code and the local evidence base within the Councils emerging Water Cycle Study, which could be detailed in Policy 3 on 'Water Management'.	This will be informed by the emerging Water Cycle Study.	None.
		Note the reference to water efficiency measures including greywater recycling and rainwater harvesting.	Support noted.	None.

		<p><u>Waste</u> Support the consideration of waste within this policy. There is a need to work in close collaboration with Worcestershire County Council in the development of sustainable waste management policies.</p>	<p>Agreed.</p>	<p>None.</p>
		<p>Note that efficient use of resources has been addressed within the policy. However, there is no explicit reference to waste minimization and re-use within this policy. Waste generated by new developments should be appropriately managed the re-use of waste should be effectively embedded in the consideration of new development proposals. We would recommend that the wording is revised to place a greater emphasis on encouraging waste minimization, re-use and recycling in order to utilize waste as a useful resource (in accordance with Sustainability Appraisal).</p>	<p>Agreed. A further reference will be included within the policy to waste minimisation, re-use and recycling.</p>	<p>Amend policy to include reference to waste minimisation, re-use and recycling.</p>

		It may be appropriate to clarify what might be expected in future developments in terms of adequate space for the storage and segregation of waste and access for waste collection vehicles.	This is too specific for inclusion within the emerging plan and is an issue that is discussed further at planning application stage. The Development Management team consults with the waste management team regarding this issue and use a technical advice note during pre-application discussions to provide applicants with best practice measures.	None.
R128	H Pankhurst OBO Natural England	This policy should include a requirement for renewable energy production. Previous draft of the Core Strategy set a target of 10%, and at one point a target of 20% was discussed. A 10% standard is not new or innovative anymore. Around half of UK authorities adopted a 'Merton Rule' and Wyre Forests recently adopted Core Strategy contains a 10% target. We hope Redditch will set a similar standard. Community- and micro-scale renewable should be promoted as a means of achieving this.	One of the objectives of the emerging plan is to ensure new development in Redditch works towards the zero carbon. Agenda It is considered the most effective way to reduce carbon in new development in Redditch is to ensure developers consider the building fabric in the first instance, this will be ensured through requiring developers to conform with the code for sustainable homes. It is considered there is more scope to reduce emissions though requiring high building standards rather than renewable energy. Therefore it is not considered appropriate to have a 'Merton style' requirement in this plan as this plan needs to be local	None.

			to Redditch.	
		This draft policy is light on requirements for climate change adaptation. The Town and Country Planning Association's Climate Change Adaptation By Design provides lots of useful background information and practical tips for delivering adaptation at neighbourhood and building scales. [weblink provided].	A further reference has been made to the need to provide Green Infrastructure, as it is considered green infrastructure is the most sustainable approach to adapt to climate change. However this document has been considered and further references to adaptation measures are included in the emerging plan in the following policies – High Quality and Safe Design, Flood Risk and Water Management and Green Infrastructure.	None.
		Green Infrastructure should be mentioned in this policy as it has a valuable role to play in climate change adaptation.	Agreed a reference will be included within the policy to the Green Infrastructure policy.	Amend policy to: <i>“adaptation measures must maximized, with particular emphasis on the provision of Green Infrastructure (see Policy X for further detail).”</i>
		Welcome the reference to Sustainability Checklist for the West Midlands.	Officers acknowledge that since the time of writing the West Midlands Sustainability Checklist has ceased to operate.	None.

R129 (A) and (B)	RPS OBO Persimmon Homes South Midlands (A) and Persimmon Homes South Midlands, Miller Strategic Land and Southern & Regional Development s (B).	Support in principle. However criterion (v) that each and every category should be met to good or best practice standard is considered unduly onerous and may threaten viability of development in some cases.	Officers acknowledge that since the time of writing the West Midlands Sustainability Checklist has ceased to operate.	None.
		The checklist is agreed to be a very useful tool. The policy should avoid over-prescription in respect of the criteria of the Checklist. The criterion should be reworded to be less prescriptive and allow a tailored approach to each development to achieve as sustainable an approach as possible and appropriate within the constraints and opportunities of the site.	Support noted. However 'good standards' are considered to be achieved be achievable by all developments and each site can tailor the approaches, therefore is appropriate be contained within a Core Strategy Policy. It is considered that achievable standards need to be required to ensure deliverability of the policy.	None.

R358	English Heritage	Point (vii) in the policy refers to retrofitting the existing housing stock. This can cover relatively modern as well as historic buildings where the appropriateness of the solution for improving water and energy efficiency can require careful appraisal to avoid harm to the significance of the heritage asset and its setting (for example in line with Policy HE 1 of PPS5). Suggest that an appropriate cross-reference is included in the supporting justification to the historic environment section.	Agreed a reference will be included to historic buildings.	Amend policy to, “ <i>the retrofit of the existing housing stock with improved insulation and water saving devices will be sought wherever practicable including for historic buildings</i> ”.
R378	Worcestershire County Council	Inclusion of adaptation measures should be made in this policy <i>[also see comments submitted in relation to climate change to the Preferred Draft Core Strategy May 2009]</i> .	Agreed further reference to adaptation measures will be incorporated within this policy.	Amend policy to “ <i>adaptation measures must maximized, with particular emphasis on the provision of Green Infrastructure (see Policy for further detail).</i> ”
		Reasoned justification could include reference to the government’s adaptation plan <i>[weblink provided]</i> .	It is not clear which report is being directed to, however further references to adaptation to climate change have been included in the plan.	None.

R339	K Parsons	New housing should be built to high environmental standards to minimize environmental impact and materials used.	Agreed, this policy and the wider plan seeks to ensure that new development in the Borough is built to high environmental standards and minimize environmental impact.	None.
R340	H Parsons			
R341	H Parsons			
R342	F Parsons			

Policy 2 Natural Environment

Rep No.	Name	Summary	Officer Response	Officer Action
R028	C Lyn	<u>Objectives</u> The original idea for the New Town was to keep buildings hidden on lower ground with trees and hedges on higher ground to provide high landscape value and to get the impression of countryside when overlooking the town.	This is still a consideration when planning applications for development are received and the emerging plan contains this policy to ensure landscape is given a high priority and the design of new development is sympathetic to the surrounding environment.	None.
		Wildlife must not be forgotten. This is very important. Wildlife should live in natural surroundings.	Agreed. Therefore the Core Strategy contains a policy focused on the Natural Environment.	None.
R030	Worcestershire County Council	The last paragraph of the Reasoned Justification is noted however, suggest referencing that this approach is consistent with	It is considered that the LTP3 should be referenced further in the plan, however Officers consider this should be located in	None.

		the overarching Worcestershire LTP3 and in particular the LTP3 Transport & Air Quality Policy and the Development Control (Transport) Policy.	the Transport policy rather than the Natural Environment Policy.	
R067	S Bloomfield OBO Worcestershire Wildlife Trust	Support for this policy but would strongly recommend that the wording or part vii is amended to include all habitats, not just woodland.	Agreed wording will be amended.	Amend wording to read, <i>"...management of habitats and woodland."</i>
R126	R Whiteman OBO Environment Agency	There is an overlap between Policy 1, 2 and 3. Suggest that point i is removed from Policy 2 and expanded upon in Policy 3 under section B on Water Management. A link could be provided within this section to cross reference within Policy 3,	Agreed. Move criteria i. from Policy 2 to Policy 3.	Move criteria i. from Policy 2 to Policy 3.
		Support point ii, iii and iv.	Support noted.	None.
		Point iv could be altered slightly to ensure that the policy is robust and sufficiently clear in relation to contaminated land, suggest amending point iv to, <i>"Demonstrate that land contamination issues have been fully addressed. Proposals must undertake appropriate remediation measures and verification works where contamination issues are</i>	It has been considered previously that contaminated land is adequately covered by national planning policy.	None.

		<i>identified.”</i>		
		<u>Reasoned Justification</u> The Strategic Flood Risk Assessment (SFRA) states that infiltration techniques are largely unsuitable. However a site specific assessment of the ground conditions should still be undertaken for each of the development sites as part of any development proposal to determine whether infiltration techniques are suitable.	Agreed. However this is more suited to Policy 3. Reasoned Justification of Policy 2 will be moved to Policy 3, the Reasoned Justification will be amended to reflect the suggested requirement.	Reasoned Justification of Policy 2 will be moved to Policy 3. Amend Reasoned Justification of Policy 3 to reflect the suggested requirement.
R128	H Pankhurst OBO Natural England	Welcome policy, however due to range of issues covered the purpose is a little unclear. Cross-references should be used to show connections but avoid the need for repetition.	It is considered the issue covered in this policy do cover the local issues related to the natural environment in Redditch Borough.	None.
		Point I on SuDS should refer specifically to naturalized, soft engineered drainage solutions which will benefit the natural environment. The detail to which types of SuDS may/may not be suitable may be better placed in the water management policy.	Agreed this detail will be included in the Reasoned Justification of Policy 3.	Agreed this detail will be included in the Reasoned Justification of Policy 3.

		Point ii covers natural resources, biodiversity and GI. This is a lot to cover in one point and is confusing. We suggest separating these out. It may be logical to integrate the biodiversity elements of point 2 with point 3. GI is worthy of a point in itself, with a cross-reference to the GI Policy.	Agreed. The policy will be amended so there is one criteria focusing on biodiversity and one on Green Infrastructure.	Amend Policy to ensure there is one criterion which focuses on biodiversity and one on Green Infrastructure.
		Welcome point v and vi, this should apply to all semi-natural habits and not just woodland. Although trees, woodland and hedgerows are an important element to the landscape and benefit biodiversity, other habitat types are equally if not more important to Redditch Borough.	Agreed. Criteria will be amended to apply to all semi-natural habitats.	Amend criteria to apply to all semi-natural habitats. Amend to: "... <i>(including ancient hedgerows) and semi-natural habitats.</i> "
		The terms 'ancient hedgerows' might be inaccurate, the term used under the Hedgerow Regulations (1997) is 'important hedgerows'. Points 5 and 6 should be integrated with or clearly linked to point 3 on biodiversity.	The regulations do refer to 'Important Hedgerows. and therefore this terms will be used.	Amend Policy to "... <i>(including Important hedgerows).</i> "
		Access, recreation and open space should also be mentioned in this policy, perhaps as part of the point on GI.	It is considered this is covered adequately within the Green Infrastructure Policy.	None.

		<p>Welcome the clear connections through to the Worcestershire Landscape Character Assessment. A similar approach should be applied to GI and biodiversity – with ‘Worcestershire GI Framework’ and ‘Worcestershire Biodiversity Action Plan’ being key document.</p>	<p>Agreed. Further links will be included within the policy to the GI Framework and the Biodiversity Action Plan.</p>	<p>Amend Reasoned Justification to reflect the GI Framework and the Biodiversity Action Plan, amend to <i>“strengthening and enhancing the character and local distinctiveness wherever possible. The Worcestershire GI Framework and Worcestershire Biodiversity Action Plan should also be used to inform the development of Development Proposals.”</i></p>
P180	P Anderson	<p>The idea of incorporating greywater recycling needs to be amplified and constrained. Any rainwater harvesting needs to utilize underground tanks and professionally controlled methods of use. Water should be available at each dwelling through a meter; it should not enter the internal dwelling areas at all as untreated water is dangerous.</p>	<p>The importance of greywater recycling has been included in the flood risk and water management policy. The emerging plan cannot control whether water meters are used in households, this is the responsibility of Severn Trent water.</p>	<p>None.</p>

R377	J Milward OBO Woodland Trust	<p><u>Sub paragraph i</u> Would like to see sub-paragraph i to include a reference as to how trees and woodlands can deliver a major contribution to resolving a range of water management issues (they offer opportunities to make positive water use change whilst contributing to other objectives such as biodiversity, timber and green infrastructure (link to relevant document provided)). <i>[Details of all positive uses of trees and woodland make to water risk management provided – see representation]. [Details provided regarding appropriate national policy relating to Trees and Woodlands – see representation.]</i></p>	<p>A reference to the benefits of woodlands will be included in the Reasoned Justification to the Policy. Reference to Water management and SuDs criteria will be moved to Policy 3.</p>	<p>Incorporate reference to the benefits of woodlands in the Reasoned Justification to the Policy. Include in Reasoned Justification the following <i>“Trees and Woodland (including the provision of new native woodland) can deliver a major contribution to resolving a range of water management issues whilst also delivering other positive factors such as biodiversity, Green Infrastructure and adapting and mitigating climate change.”</i></p>
		<p>Importance of the West Midlands Forestry Framework highlighted (alongside delivery exemplars).</p>	<p>Noted.</p>	<p>None.</p>
		<p>The full value and potential of trees and woods to help mitigate flooding, and improve water quality should be recognized and properly funded at all levels of policy and delivery.</p>	<p>A reference to the benefits of woodlands will be included in the Reasoned Justification to the Policy.</p>	<p>Incorporate reference to the benefits of woodlands in the Reasoned Justification to the Policy. Include in Reasoned Justification the following <i>“Trees and</i></p>

				<i>Woodland (including the provision of new native woodland) can deliver a major contribution to resolving a range of water management issues whilst also delivering other positive factors such as biodiversity, Green Infrastructure and adapting and mitigating climate change.”</i>
		<p>Would like to see <u>sub paragraph i</u> amended to, <i>“For Redditch suitable methods include greywater recycling, rainwater harvesting, green roofs, new native woodland creation, permeable surfaces, swales and ponds, which are all features of the natural environment.”</i></p>	<p>The reference to SuDs will be moved to Policy 3; however this amendment will be made to reflect the suggestion.</p>	<p>Make suggested amended to; <i>“For Redditch suitable methods include greywater recycling, rainwater harvesting, green roofs, new native woodland creation, permeable surfaces, swales and ponds, which are all features of the natural environment.”</i></p>

		<p><u>Sub paragraph vi</u> Support reference to ancient semi-natural woods.</p>	Support Noted.	None.
		<p>Would like sub-paragraph vi. to make it clear that ancient semi-natural woodland should have absolute protection <i>[benefits and policy requirements provided detailing why this should be included in policy]</i>.</p>	<p>It is considered that the policy adequately stresses that woodlands and hedgerows must be retained, however there may be situation were other benefits of the scheme outweigh their retention and therefore it is not suitable to amend the policy as per the suggestion. In addition, protection for ancient woodland is specifically referred to in National Planning Policy Framework.</p>	None.
		<p>Would like to see ancient trees similarly protected <i>[benefits and policy requirements provided detailing why this should be included in policy]</i>.</p>	<p>The policy will be amended to make reference to ancient trees as well as existing trees, woodland and hedgerows.</p>	<p>Amend policy to “existing trees (including Ancient Trees), woodlands and hedgerows”.</p>
		<p>Like to see support for new native woodland creation, with particular links to delivering benefits for green infrastructure <i>[benefits and policy requirements provided detailing why this should be included in policy]</i>.</p>	<p>Reference will be included in criteria to state that this aids in delivering Green infrastructure benefits.</p>	<p>Amend policy to “Trees and Woodland (including the provision of new native woodland) can deliver a major contribution to resolving a range of water management issues whilst also delivering other positive</p>

				<i>factors such as biodiversity, Green Infrastructure and adapting and mitigating climate change.”</i>
		<p>There would like to see paragraph vi be amended to :</p> <p><i>“Particular emphasis should be placed on the protecting, expanding and linking of ancient semi-natural woodlands and ancient trees, together with support for increasing native tree cover in the Borough.”</i></p> <p>Would like to see this expended into a dedicated Trees & Woodland Strategy/ SPD for Redditch Borough.</p>	<p>Agreed. Policy criterion will be amended to reflect suggestion.</p> <p>A SPD dedicated to Trees & Woodland is not an SPD scheduled for completion. The Core Strategy DPD is the current focus for completion. The Draft NPPF has stated that SPDs should only be used to <i>“to bring forward sustainable development at an accelerated rate.”</i> (page 7)</p>	<p>Amend criterion to <i>“Particular emphasis should be placed on the protecting, expanding and linking of ancient semi-natural woodlands and ancient trees, together with support for increasing native tree cover in the Borough.”</i></p> <p>None.</p>
R378	Worcestershire County Council	Reference should be made to protected species within Policy 2; this should also be reinforced in Policy 15 Rural Economy when considering proposals for reuse or	Agreed a reference to protected species will be included in Policy 2 and in Policy 15.	Include reference to protected species in Policy 2 and 15.

		conversion of buildings.		
		Policy 2(i) reference to SUDs is welcomed. Suggest that this policy would sit better elsewhere within this document (either Policy 1 on Climate Change or Policy 3 or in policies on design.	This criterion will be moved to Policy 3.	Move criterion i. from Policy 1 to Policy 3.
		This policy should also refer to comments in the Reasoned Justification which state: <i>“Redditch Borough suffers from negligible permeability”</i> and the need for an appropriate assessment of suitable SUDs measures.	This is already adequately covered in the Reasoned Justification; however this criterion and subsequently this section of the Reasoned Justification will be moved to Policy 3.	None.
		Not clear how other elements within this policy would form features of a ‘natural’ environment i.e. greywater recycling or rainwater harvesting.	References to water management will be moved from this Policy to Policy 3.	None.
		Reference to the benefits of the natural environment in adapting to and mitigating to for future climate change would be welcomed.	The Reasoned Justification will make reference to the fact that the natural environment contributes to adapting and mitigating to climate change.	Amend Policy to <i>“Trees and Woodland (including the provision of new native woodland) can deliver a major contribution to resolving a range of water management issues whilst also delivering other positive</i>

				<i>factors such as biodiversity, Green Infrastructure and adapting and mitigating climate change.”</i>
		Alternate policy (i) and (ii).	Criterion i. will be moved to Policy 3.	None.
		Key habitats identified within the policy are very specific including trees, woodland but should not be exclusive and also include other key habitats such as unimproved grassland, acid grassland and heath land. This point could easily be broadened to include BAP habitats.	The Biodiversity Action Plan will be referred to in the Reasoned Justification.	Amend Policy to <i>“The Worcestershire GI Framework and Worcestershire Biodiversity Action Plan should also be used to inform the development of Development Proposals.”</i>
		The reasoned justification of this policy should include reference to the Worcestershire Biodiversity Action Plan (BAP) and priority habitats, species and the woodland guidelines in addition to landscape character. The reasoned justification (which includes reference to woodland management) could also include reference to BAP priority habitats.	The Reasoned Justification will be amended to incorporate reference to the Biodiversity Action Plan (including habitats) and other priority habitats and species as referred to.	Amend Policy to <i>“The Worcestershire GI Framework and Worcestershire Biodiversity Action Plan should also be used to inform the development of Development Proposals.”</i>

		<p>Policy misses reference to some important other landscape aspects. Recommend the following additional point; <i>"viii. Ensure that development proposals will not have an adverse impact on skylines and hill features, including established views of these features."</i></p>	<p>Amend policy to reflect suggested wording with the inclusion of <i>"have a significant adverse impact"</i>.</p>	<p>Policy to be amended to reflect suggested concept. Include wording: <i>"viii. Ensure that development proposals will not have a significant adverse impact on skylines and hill features, including established views of these features."</i></p>
		<p>Reference should be made to the Worcestershire Landscape Character Assessment and the Worcestershire Historic Landscape Characterisation (October 2011) to inform the need that landscaping proposals associated with new development should seek to maximize woodland planting, and using indigenous species, enhancing the landscape character of the area.</p>	<p>There are links already within the policy to the Landscape Character Assessment. It is considered that the links to the Historic Characterisation Study would be better suited to Policy 21.</p>	<p>Incorporate links to Historic Characterisation Study within Policy 21.</p>
	English Heritage	<p>Point (v) of the policy refers to the Boroughs distinctive 'natural landscape' which is then followed through in the justification to the Worcestershire Landscape Character Assessment.</p>	<p>Agreed that all landscape is important however it is the purpose of this particular policy to focus on the Natural environment, other forms of landscape are considered elsewhere within the</p>	<p>None.</p>

		<p>Recommend that the policy wording is amended to refer more generally to 'landscape' in response to the natural and cultural on the character of the present day landscape. Although the historic landscape is dealt with in detail in the historic characterisation study (nearing completion), we consider an integrated approach to the landscape is warranted here and in line with the European Landscape Convention. A suggested amendment might be along the lines of;</p> <p><i>“demonstrate the Borough’s distinctive <u>landscape</u> is protected, enhanced or restored, as appropriate and proposals are informed by and sympathetic to the character of the surrounding landscape character.”</i></p>	<p>core strategy (Historic Environment – Policy 21 and design related to the surrounding landscape – Policy 23.</p>	
		<p>Justification at page 29 should include cross-references to the Historic Environment Assessment and also the County’s historic landscape characterisation notwithstanding the coverage in the historic environment section.</p>	<p>As above.</p>	<p>None.</p>

Policy 3 Flood Risk and Sustainable Water Management

Rep No.	Name	Summary	Officer Response	Officer Action
R048	William Davis Ltd	Object to the requirements for greywater recycling and rainwater harvesting on new residential developments. As both of these water management systems carry significant additional costs that would be highly likely to constrain viability of development schemes. In line with PPS1 the council should undertake a further viability assessment to ensure requirement is viable and practicable, without assessment the requirements are inconsistent with national policy.	It is considered that Redditch Borough Council has sufficient evidence to request that rainwater harvesting and greywater recycling are requested as part of any new development. However to ensure schemes that are genuinely made unviable due to this requirement a sentence will be inserted in the policy which states that greywater recycling and rainwater harvesting will be required unless a viability assessment conducted by the developer demonstrates the scheme it is undeliverable.	Amend Reasoned Justification to include a sentence which states greywater recycling and rainwater harvesting will be required unless a viability assessment conducted by the developer demonstrates it is undeliverable. Amend to <i>“Greywater recycling and rainwater harvesting will be required unless a viability assessment conducted by the developer demonstrates they are undeliverable.”</i>
R067	S Bloomfield OBO Worcestershire Wildlife Trust	Support for this policy but would strongly recommend a clear presumption in favour of multi-functional and biodiversity –led SUDS in all cases where conditions permit. This is alluded to but we believe that the wording should be strengthened.	Agreed, wording will be amended to demonstrate that multi-functional biodiversity led SuDS are preferred. Wording will also be included in Policy which states that sites should be assessed on their merits to determine which SuDs techniques are the most	Amend wording in line with suggestions as per Officer Recommendation. Amend Reasoned Justification to: <i>“There will be a clear presumption in favour of</i>

		Furthermore we would contend that whilst infiltration techniques might not be applicable overland conveyance through swales (often regarded as being unsuitable in areas with low permeability) should be considered on a site by site basis in light of the other benefits they can bring to a SUDS.	suitable.	<i>soft-engineered, multi-functional and biodiversity-led SUDS and sites should be assessed on their merits to determine which SuDs techniques are the most suitable.”</i>
R078	S Arble OBO Feckenham Parish Council	Support for this policy. Request that the phrase “ <i>in areas subject to Flood Risk</i> ” be omitted so that all proposals would have to take into account the possible effects elsewhere from any proposed development. This is of relevance to Feckenham due to risk posed by development of Webheath ADR, which would increase the risk of flooding.	This purpose of this point within the policy is to ensure that all other alternative locations have been considered ahead of the area within flood risk. If these words are omitted then the purpose of the sentence would not be clear or coherent.	None.
R125	K Venham OBO Barton Willmore OBO Barratt Strategic and Taylor Wimpey UK Ltd	With reference to paragraph 30 of PPS1, part A of this Policy (Flood Risk) is superfluous as it is a duplication of the requirements of PPS25 and the sequential approach to site selection. It is considered the first part of this policy should be deleted.	Due to the importance and relevance of this issue in Redditch it is important to retain this section of the policy; however this policy will be further informed by the SFRA L2 and WCS Update when these documents are complete to ensure this policy relates directly to Redditch.	None.
R126	R Whiteman	The title could be amended	Agreed policy title will be	Amend Policy title to:

	OBO Environment Agency	slightly to 'Flood Risk and Sustainable Water Management'.	amended to Flood Risk and Sustainable Water Management.	<i>"Flood Risk and Sustainable Water Management"</i> .
		A. <u>Flood Risk</u> Point ii of this policy is misleading as a Flood Risk Assessment (FRA) is also required for sites plus 1ha, which could be within Flood Zone 1.	The policy will be amended to state that a Flood Risk Assessment is also required for sites plus 1ha which are in Flood Zone 1. check this	Amend policy wording to <i>"Functional Floodplain"</i> or <i>above 1 Hectare in Flood Zone 1 is developed"</i> .
		The Policy refers to PPS25, however we suggest that the policy should be more locally specific rather than duplicating government policy, with links to the Councils SFRA. The policy should also be further informed by the Level 2 SFRA currently being undertaken.	The Policy will be tailored to the findings of the SFRA L2 and Water Cycle Study when these documents are completed.	None.

		<p>Reference should be made to ensuring that new development is designed to be safe taking into account the lifetime of the development (and the need to adapt to climate change). The policy is broad at the moment, we would seek clarification on how the council intend to secure further flood risk guidance (locally specific), such as design on safe developments incorporating the recommendations of the Councils SFRA L2 i.e. within the councils subsequent Site Allocations and Policies DPD and/or a local sustainability checklist, this should be explained within the Reasoned Justification of the Core Strategy.</p>	<p>Further site specific advice site specific advice is contained within the Strategic Site Policies as this is the most appropriate location for specific site detail.</p>	<p>None.</p>
		<p>Would support a reference within the policy for development proposals to provide betterment in flood storage and flood flow routes, where appropriate, in line with the policy recommendations in the SFRA L1. Also a betterment in surface water run-off rates for brownfield sites (20%).</p>	<p>Agreed. Policy will be amended in line with the recommendations of the SFRA L1.</p>	<p>As per the wording within SFRA L1 the following sentence will be included, <i>“Where practicable flood risk should be reduced by increasing flood storage, improving flood flow routes and/or removing existing obstructions to flow.”</i></p>

		<p>Reference should be made to appropriate buffer strips adjacent to watercourses here or linked to a more detailed policy within the Site Allocations and Policies DPD. The Environment Agency normally require an 8m buffer strip adjacent to watercourses classified as 'Main Rivers' or betterment over the existing situation (to be agreed with the Environment Agency) where this is not achievable due to the existing development. The LADN Drainage Office would be able to advise on suitable buffer strips for 'ordinary watercourse'.</p> <p>[Refer to detailed flood risk comments provided in response to previous Preferred Draft Core Strategy May 2009].</p>	<p>There are no development sites suggested along the main watercourses as the main watercourse – the River Arrow runs through protected park land. With regard to ordinary watercourses it is considered that this would be dealt with during the planning application process as it is too detailed for inclusion within the Core Strategy.</p>	<p>None.</p>
--	--	--	---	--------------

		<p>B. <u>Water Management</u> Severn Trent's Water Resources Management Plan and the draft Outline Water Cycle Study have identified that there is enough sufficient supply of water for the Borough to meet proposed housing growth, however local evidence (including CAMS) within the emerging WCS supports the use of water efficiency techniques. We would refer to above comments regarding the inclusion of a target for water efficiency techniques in new developments linked to the Code for Sustainable Homes and BREEAM or AECB (Assessment of Environment Conscious Building) standards.</p>	<p>Agreed.</p>	<p>None.</p>
--	--	--	----------------	--------------

		<p>The Draft Outline WCS has identified some constraints within the existing sewerage systems in infrastructure capacity and spare treatment capacity. The findings of the study should be used to shape the policy on protecting water quality and explaining how the local authority will overcome the constraints raised by the study. For example phasing development in line with any required foul drainage infrastructure upgrades and ensuring that foul flows can only enter the system once the upgrading work is complete.</p>	<p>Agreed. The findings of the SFRA L2 and WCS Update will be incorporated into the policy once these studies are completed.</p>	<p>None.</p>
		<p>We would recommend that the last sentence on water treatment infrastructure is altered to better reflect the above, for example, <i>“Development within area of infrastructure and treatment capacity constraint, as identified by the Water Cycle Study must demonstrate that the necessary infrastructure is in place to serve the development.”</i></p>	<p>Agreed. Policy will be amended to reflect the need to ensure necessary infrastructure is in place to serve new development.</p>	<p>Amend Policy to: <i>“Development within area of infrastructure and treatment capacity constraint, as identified by the Water Cycle Study must demonstrate that the necessary infrastructure is in place to serve the development.”</i></p>

		<p>Reference could be made to non-mains drainage within either a DPD policy or through a local sustainability checklist.</p>	<p>Agreed reference will be made to the need to connect to the correct infrastructure.</p>	<p>Amend Policy to: <i>“With regard to foul water disposal, developments should first look to connect to the main foul sewer as the preferred most sustainable option. Only once it has been demonstrated that it is not feasible/practical to connect to the mains sewer should the developer consider non-mains foul drainage options (see Planning circular 3/99 for more information).”</i></p>
		<p>Planning Authorities, under the Water Framework Directive (WFD) have a duty to take account of the River Basin Management Plan. Planning policies and activities can ensure that new development does not create adverse pressures on the water environment that could compromise our ability to meet WFD objectives. Reference could</p>	<p>Agreed reference to the suggested document will be made in the Reasoned Justification to the policy.</p>	<p>Amend Reasoned Justification to <i>“New development must not create adverse pressures on the water environment that could compromise Redditch’s ability to meet the Water Framework Directive (WFD) objectives.”</i></p>

		be made to the WFD in the Reasoned Justification.		
R128	H Pankhurst OBO Natural England	Part B on water management should promote the use of soft engineered SuDS. The description on which SuDS would/ would not be suitable in the borough would be better located here.	Agreed. The Reasoned Justification will promote the use of soft engineered SuDS. Agreed. Criterion i. from Policy 2 will be moved to Policy 3.	Amend policy Reasoned Justification to <i>“There will be a clear presumption in favour of soft-engineered...”</i> Move Criterion i. from Policy 1 to Policy 3.
R174	A Bedford-Smith	Bow Brook needs consideration	Any watercourses that are in close proximity to large development sites have been considered as part of the SFRA L2. As this watercourse is a significant distance from any potential development sites it is not being considered as part of the SFRA L2. However the full implications from potential development at Webheath are being fully considered.	None.
P180	P Anderson	Agree with policy with regard to site selection.	Support noted.	None.

		In addition water traversing a site should be considered. New development upstream can greatly increase flows, even when mitigation measures are installed. When assessing a new site downstream problems should be considered e.g. ducts under Sainsbury's roundabout are beyond full capacity leading to flooding. If new ducts are to be installed they must have capacity to take existing excess flows.	All forms of flooding have been considered through the SFRA L2. The Policy also states that all effects of development elsewhere have been fully assessed and mitigated against.	None.
		With regard to mitigating flow if a site is characterize by impermeable subsoil, installing water dispersal ponds is impractical and the developer will need to identify and create a site downstream where surface water can be held so that it percolates down into the aquifers. Money is needed to maintain these features.	The appropriate SuDs techniques should be assessed on a site by site basis, with the developer baring the cost of the implementation and functioning of the chosen SuDS method.	None.
		From a biodiversity point of view (Policy 2) this will lead to some re-instatement of the wetlands that used to exist beside the river. There are several options (9 provided see representation).	The re-instatement of wetlands beside river beds will be supported, although it is out of the remit of the Core Strategy to request this for all developments.	None.

		<p>It may, on occasions be appropriate to hold water within the boundaries of the site. However ponds tend to silt up quickly reducing capacity. Capacity needed for such holding ponds has been greatly underestimated. It is considered that if a site is 1 hectare in size, 30% of the precipitation should be the capacity of a holding tank or pond. This requirement should be stated in our policy. If this is an attenuating pond, the policy should also state the release rate. This holding facility should be an underground tank.</p>	<p>This would be appropriate for inclusion within the Reasoned Justification.</p>	<p>Amend Reasoned Justification to include: <i>“It is preferable that water should be held within the boundaries of the site wherever possible.”</i></p>
R378	Worcestershire County Council	<p><i>[Refer to previous comments submitted to Preferred Draft Core Strategy (May 2009)].</i> Lack of consideration of addressing pollution which is increasingly important with regard to delivering targets in Severn River Basin Management Plan. Policy 3B appears weak in this regard.</p>	<p>Officers consider that pollution is dealt with adequately at national planning policy level and therefore is not necessary within the Core Strategy.</p>	<p>None.</p>

		<p>No reference to Water Framework Directive and River Basin Management Plan in the Reasoned Justification. Also no reference to Surface Water Management Plan and impacts on 'pluvial flooding'.</p>	<p>These documents will be considered further through the Reasoned Justification of the Policy.</p>	<p>Amend Reasoned Justification to: <i>“New development must not create adverse pressures on the water environment that could compromise Redditch’s ability to meet the Water Framework Directive (WFD) objectives. It is also important for applicants to bear in the mind the important of the River Basin Management Plan and the Surface Water Management Plan when putting together proposals.”</i></p>
--	--	---	---	--

Policy 4 Sustainable Travel and Accessibility

Rep No.	Name	Summary	Officer Response	Officer Action
R030	WCC	Suggest referencing that approach is consistent with the overarching Worcestershire LTP3 and in particular the LTP3 Integrated Passenger Transport Policy and Development Control (Transport) Policy.	Agreed a reference will be included within the Policy's Reasoned Justification which states that the approach taken is in line with LTP3.	Amend Reasoned Justification to <i>"Any Planning Application should consider and incorporate the recommendations of the Worcestershire Local Transport Plan No.3 and its Supporting Policy documents."</i>
		Bullet point i. of Policy suggest referencing the LTP3 and in particular Accessibility Policy and Development Control (Transport) Policy.	It is considered that it is not appropriate to reference LTP 3 directly within the Policy wording; however it is appropriate to incorporate a reference within the Reasoned Justification to the Policy.	Amend Reasoned Justification to <i>"Any Planning Application should consider and incorporate the recommendations of the Worcestershire Local Transport Plan No.3 and its Supporting Policy documents."</i>

		<p>Bullet point ii. Suggest referencing the LTP3 and in particular the Walking & Public Realm Policy, the Cycling Policy and the Accessibility Policy.</p>	<p>It is considered that it is not appropriate to reference LTP 3 directly within the Policy wording; however it is appropriate to incorporate a reference within the Reasoned Justification to the Policy.</p>	<p>Amend Reasoned Justification to <i>“Any Planning Application should consider and incorporate the recommendations of the Worcestershire Local Transport Plan No.3 and its Supporting Policy documents.”</i></p>
		<p>Bullet points iii. And vi. Suggest that a specific point on public transport is required (similar to the for walk, cycle and coach) along the lines of; <i>“...ensuring that public transport infrastructure, services and information is provided for users and operators, to a level that is consistent with actively encouraging use of public transport as part of the process of delivering sustainable growth and minimizing the impact on the economy and environment of traffic generated by new development. Proposals should incorporate measures which maximize accessibility to/from/between public transport modes, both at the development</i></p>	<p>Amend Policy to reflect suggestion.</p>	<p>The Policy will be amended to reflect the purpose of the comments, The Policy will be amended at Point I <i>“meeting development requirements in accessible locations and taking account of interactions between uses, including maximizing accessibility to, from and between public transport modes, both at the development sites and at key modes such as Redditch bus and rail interchange;”</i> and an additional Point included at Point V</p>

		<p>sites and at key modes such as Redditch bus/rail interchange. The Worcestershire LTP3 provides details of the types of measures that could be considered to encourage use of public transport with further detail provided in the LTP3 Integrated Passenger Transport Policy, Accessibility Policy, Development Control (Transport) Policy and Smarter Choices Policy.”</p>		<p>“ensuring that public transport infrastructure, services and information is provided for users and operators in order to encourage the use of public transport”.</p>
		<p>Bullet point v. suggest referencing the LTP3 and in particular the Traffic Management & Parking Policy and Integrated Passenger Transport Policy.</p>	<p>It is considered that it is not appropriate to reference LTP 3 directly within the Policy wording; however it is appropriate to incorporate a reference within the Reasoned Justification to the Policy.</p>	<p>Amend Reasoned Justification to “Any Planning Application should consider and incorporate the recommendations of the Worcestershire Local Transport Plan No.3 and its Supporting Policy documents.”</p>

		<p>Bullet Point vii. Suggest that this policy is strengthened to reference to and maintain consistency with the Worcestershire LTP3 and associated Development Control (Transport) Policy and the Worcestershire Transport Assessment Guidelines. These set out the methods by which the impact of new development on the transport network and the means by which these can be mitigated through sustainable transport measures (consistent with Policy 4 and other Core Strategy sustainability policies).</p>	<p>It is considered that it is not appropriate to reference LTP 3 directly within the Policy wording; however it is appropriate to incorporate a reference within the Reasoned Justification to the Policy with regard to LTP 3 and Worcestershire Transport Assessment Guidelines.</p>	<p>Include reference to LTP 3 and Worcestershire Transport Assessment Guidelines in Reasoned Justification. Amend Reasoned Justification to <i>“Any Planning Application should consider and incorporate the recommendations of the Worcestershire Local Transport Plan No.3 and its Supporting Policy documents.”</i> And <i>“Transport Assessments should be prepared in line with the Worcestershire Transport Assessment Guidelines and Worcestershire Highways Design Guidance (both can be found on the County Council Website (located under Transport Guidance). A Transport Assessment will be expected where</i></p>
--	--	--	---	--

				<p><i>proposals for development exceed the following thresholds, developments below these thresholds still have an impact on the local transport network and may be required to provide a Transport Statement. Developers are advised to check at an early stage with Worcestershire County Council to establish what level of information is required (pre application meetings are actively encouraged in order to address any potential issues)."</i></p>
		<p>Bullet Point viii. This could benefit from reference to and consistency with the Worcestershire LTP3 and associated Smarter Choices Policy (which sets out role and importance of Travel Plans) and Development Control (Transport) Policy.</p>	<p>It is considered that it is not appropriate to reference LTP 3 directly within the Policy wording; however it is appropriate to incorporate a reference within the Reasoned Justification to the Policy.</p>	<p><i>Amend Reasoned Justification to "Any Planning Application should consider and incorporate the recommendations of the Worcestershire Local Transport Plan No.3 and its Supporting Policy documents."</i></p>

		<p><u>Reasoned Justification</u> Second paragraph of Reasoned Justification regarding anti-social behaviour – LTP3 includes policies and a strategic delivery plan to help address this. The deficiencies mentioned also highlight the need for new developments to be designed with the infrastructure and services in place to maximize the use of walk, cycle and public transport.</p>	<p>It is considered the policy is in line with what is suggested.</p>	<p>None.</p>
		<p>With regard to desire lines perhaps add reference to the need to provide accessible, reliable and convenient public transport reinforced by strong and enforceable Travel Plans.</p>	<p>It is considered this is already adequately covered within the policy.</p>	<p>None.</p>
		<p>Following the paragraph requesting a Transport Assessment it is strongly suggested that this needs to be strengthened and include specific reference to WCC Guidance on Transport Assessments, the LTP3 and the associated Development Control (Transport) Policy. A thorough and soundly based Transport Assessment is critical from the point of identifying the</p>	<p>Include reference to Worcestershire Transport Assessment Guidelines.</p>	<p>Amend Reasoned Justification to include reference to Worcestershire Transport Assessment Guidelines, amend to <i>“Transport Assessments should be prepared in line with the Worcestershire Transport Assessment Guidelines and</i></p>

		<p>transport impacts of development generated travel demand and should not be restricted to those developments considered to impact on the 'Primary Route Network'. A properly prepared Transport Assessment or Transport Statement will allow Redditch Borough Council (as the Local Planning Authority) to assess a developments compatibility with the relevant planning policy framework i.e. Core Strategy and supporting documents and in particular, the relevant transport strategy (usually the LTP). It will allow the transport implications of proposed developments to be properly considered and, where appropriate, will help identify suitable measures to achieve a more sustainable and environmentally sound outcome. A Transport Assessment or Transport Statement will also identify and help to address issues likely to be of concern to the local traffic authority and the Highways Agency where relevant, in performing their network</p>	<p><i>Worcestershire Highways Design Guidance (both can be found on the County Council Website (located under Transport Guidance). A Transport Assessment will be expected where proposals for development exceed the following thresholds, developments below these thresholds still have an impact on the local transport network and may be required to provide a Transport Statement. Developers are advised to check at an early stage with Worcestershire County Council to establish what level of information is required (pre application meetings are actively encouraged in order to address any potential issues)."</i></p>
--	--	---	---

		management duties.		
		The fifth paragraph regarding cycle routes should reference the role of Travel Plans (and associated measures) in supporting use of walk, cycle, public transport and high occupancy car modes.	It is not considered necessary to repeat the role of Travel Plans as this is adequately covered in the Policy and would be at risk of repetition.	None.
		Paragraph seven refers to quiet lanes, it is suggested that the scope of this is widened to cover Smarter Choices and Travel Plan measures as a whole as evidence shows that this is the most effective way of encouraging use of sustainable transport and 'locking-in' the benefits of any investment in transport infrastructure (e.g. cycle ways, improved walk routes, new public transport infrastructure etc).	Agree with the importance of the Smarter Choices approach and Travel Plan measures, however this intention of this paragraph is to reference particular initiatives that can be implemented on the back of development.	None
		Regarding the thresholds for the requirement of a Transport Assessment, the thresholds needs to be consistent with the WCC thresholds (see LTP3 Highways Design Guidance – extract provided) and amend Reasoned Justification to read; <i>“The following thresholds are</i>	Amend policy in line with suggestion and Include thresholds provided within the Policy.	Amend policy in line with suggestion and include thresholds for Transport Assessments (taken from Worcestershire Highways Design Guide).

		<p><i>normally applied for initiating a Transport Assessment. Developments below these thresholds still have an impact on the local transport network and may be required to provide a Transport Statement. Developers are advised to check at an early stage with Worcestershire County Council to establish what level of information is required. We actively encourage pre application meetings in order to address any potential issues at an early stage. [Thresholds provided]</i></p> <p><i>Scoping Reports shall be provided and be agreed in writing by Worcestershire County Council prior to the undertaking of the TA Report.</i></p> <p><i>Worcestershire County Council has produced guidance to assist developers undertaking TA's. This is located here:</i> www.worcestershire.gov.uk/LTP3 <i>"</i></p>		
R128	H Pankhurst OBO Natural England	Support this policy and recommend that it is clearly linked to the policy on GI. Integrating pedestrian and cycleways into the	Include reference to Green Infrastructure in Policy.	Incorporate a reference to Green Infrastructure within Criterion iii as per recommendation.

		GI network can make them safer and more attractive, thereby increasing the likelihood that they will be used.		Amend to <i>“ensuring that infrastructure for pedestrians and cyclists is provided and that it facilitates walking, cycling and public transport. The Green Infrastructure Network should be integrated into the pedestrian network and Cycleways to ensure they are made safer and more attractive.”</i>
P180	P Anderson	Policy says little about the need to extend and improve the bus routes within the existing borough. The current system operates by buses go out from the Town Centre and return. This leads to people having to enter the Town Centre to go elsewhere. Another ring route is needed that links the north of the borough in the same way that the south is linked, with an interchange at Woodrow so bus users can change from one circular route to the other. This will entail a route going through Batchley that goes under the dual carriageway and on up through	An additional criterion has been included within the Policy which focuses on the provision of public transport. However with regard to the route network this is out of the remit of the Core Strategy to and the suggestions made will be send to Worcestershire County Council for consideration.	None.

		Webheath. The route would then return to the Town Centre along Studley Road. Providing two sustainable routes, upon which links to employment centres can be created.		
		Policy needs to recognise the difference in heights between New Town and old town and this has implications for cycle routes.	This would be considered at the planning application stage when considering the design and location of a cycle route and its connection to the proposed development.	None.
		No provision within policy to prevent the creation of 'rat runs' within communities. There is potential for one in Webheath, through Crumpfields Lane to Hanbury.	This would be considered at the planning application stage when considering the design and access of the proposed development by the Strategic Highways Authority.	None.
R358	English Heritage	The quality of the public realm can be an important factor in influencing the take up of sustainable modes of travel (cycling and walking) and conversely also be negatively affected by the inappropriate location and design of new infrastructure.	Agreed. Therefore the Core Strategy has included a Policy focusing on Design and High Quality Environments.	None.

		Suggest that an additional point is incorporated into the policy on promoting a high quality public realm; alternatively this could be included under expanded point (iii).	The Core Strategy has included a Policy focusing on Design and High Quality Environments which must be adhered to when proposals come forward.	None.
--	--	---	--	-------

		<p><u>Creating and Sustaining a Green Environment (page 25)</u></p> <p>Following the sentence which states <i>“As Redditch is designed around private car use, reducing the emissions from this mode of transport is a constant challenge for the Borough to address”</i>, please see previous reference to the encouraging performance of Redditch in terms of public transport use and the importance of delivering highly accessible new developments if use of walk, cycle, bus, rail and high occupancy car is to be maximized.</p>	Agree further reference will be made to the success of the bus routes in the Borough.	Amend Policy to <i>“Public transport use in Redditch is high, with successful bus routes in the Borough, however it is important to grow this service in order to deliver highly accessible new developments which include access via walking, cycling, bus and rail.”</i>
--	--	--	---	--

		<p>Following the last paragraph on page 25 which ends on page 26. It is important to note that Redditch New Town designers specifically incorporated measures to make local public transport (bus) as efficient and attractive as possible. This approach has helped to deliver the most commercial and well used network of local bus services in Worcestershire (reducing reliance on public sector subsidy and increasing sustainability). See previous reference to the encouraging performance of Redditch in terms of public transport use and the importance of delivering highly accessible new development if use of walk, cycle, bus, rail and high occupancy car is to be maximized.</p>	<p>Agreed. Reference will be made to the design of the Bus Routes when planning Redditch and the success of the subsequent routes.</p>	<p>Include reference to the design of the New Town and the bus routes. Amend Policy to <i>“Redditch New Town designers specifically incorporated measures to make local public transport (bus) as efficient and attractive as possible. This approach has helped to deliver the most commercial and well used network of local bus services in Worcestershire”</i></p>
R059	S Watkiss	<p>Transport provisions should be a primary concern, particularly improving access for pedestrians and cyclists.</p>	<p>Agreed. A Policy is included within the Core Strategy which focuses on Sustainable Travel and Accessibility.</p>	<p>None.</p>
R127	Highways Agency (HA)	<p>In defining growth levels to take forward, the HA needs to be satisfied that development can take place without detrimental</p>	<p>Agreed. The Borough Councils continues to work with the Highways Agency during the preparation of the Core Strategy</p>	<p>None.</p>

		impact on the safety and free flow of traffic on the SRN and understand what, if any, mitigation measures may be required.	and Local Development Framework.	
R174	A Bedford-Smith	Failure of WCC Highways Authority to comprehend dangers of traffic on country lanes particularly Callow Hill and Astwood lane	Concerns have been forwarded to the Highways Departments at Worcestershire County Council and no significant road or pedestrian safety concerns have been identified to rule out development potential.	None.

Environmental (non- direct policy related comments)

Rep No.	Name	Summary	Officer Response	Officer Action
R067	S Bloomfield OBO Worcestershire Wildlife Trust	Welcome the commentary and high profile given to biodiversity, GI, SUDS and sustainable development throughout the document. In particular, please to note that 'greening' the borough is considered to be so important and we look forward to working with the council on delivering a GI Strategy to help with this.	Support noted	None.
R128	H Pankhurst	Welcome Policy suite.	Support noted.	None.

	OBO Natural England	<p>The statement in the first paragraph that “<i>many features of the natural environment are particularly sensitive to flood risk and climate change</i>” is perhaps misleading. Climate change is considered to be one of the greatest threats the natural environment faces, but this is because changing temperatures and weather patterns may alter habitat composition and species distribution rather than because of increased flood risk.</p>	<p>Agreed amend Policy in line with recommendation.</p>	<p>Amend Policy to ““<i>many features of the natural environment are particularly sensitive to the consequences of climate change, including changing temperatures and weather patterns and an increased risk of flood risk to name just two</i>”.</p>
		<p>The second paragraph mentions trees and a distinctive feature of the Boroughs landscape. Although trees are of course important, other habitat types are equally if more important to the boroughs local distinctiveness. The borough is split between two Natural Character Areas; Arden and Severn and Avon Vales. These NCA may provide a useful backdrop in defining in quite broad terms those features which contribute towards the boroughs local distinctiveness [web links with info provided].</p>	<p>Agreed. The Natural Environment Policy refers to other locally distinctive habitats rather than just trees.</p>	<p>None.</p>

		<p>The paragraph on climate change muddles its terminology in places. Care should be taken not to imply that new development will mitigate carbon dioxide emission – new development will always increase CO₂ emissions. Ensuring new development emits as little as possible will mitigate the <i>increase</i> in CO₂ emissions, therefore the policies in the Core Strategy will, for the most part, minimize rather than reduce or mitigate emissions.</p>	<p>Agreed. Terminology will be amended to ensure clarity.</p>	<p>Amend references to climate change to ensure reference is made to minimize carbon rather than mitigate.</p>
		<p>The reference to WCC’s technical paper is not accurate. TIP’s report concluded that the opportunities for large-scale renewable energy production in the county were limited. However, it did not consider the opportunities for community-or micro-scale generation. To say that renewable energy cannot be a major source of energy within Redditch Borough takes this too far. Considering TIP’s findings, the Core Strategy should really push community or micro-generation.</p>	<p>Agreed, this is referred to in this section. However the phrase “large scale” will be included to ensure readers are clear.</p>	<p>Amend sentence to read <i>“Worcestershire County Council have demonstrated that the use of large-scale renewable energy cannot be a major source of energy within the Borough.”</i></p>

R358	English Heritage	Concern over how these policies take account of the historic environment. It would be useful to include relevant cross-references to help reinforce the links across these topic areas and between chapters.	There is a reference within the Historic Environment Policy to mitigating climate change.	None.
		<p><u>Page 25 Introductory Text</u> Flood risk and climate change also pose a risk to the historic environment and heritage assets. The opening paragraph could be made more general by referring to the 'environment' not just the 'natural environment' in terms of the risks and minimizing the potential. A cross-reference to the policy chapter on the historic environment could also be included to explain that the consideration of climate change mitigation and adaption and the historic environment is also addressed in the relevant section.</p>	Agreed, the opening paragraph will be made more general by referring to the 'environment' not just the 'natural environment', this will be cross cutting to refer to all parts of the environment.	Amend Introductory chapter by removing the work natural, to refer to the broad environment.

R378	Worcestershire County Council	Reference to the forthcoming Landscape Character Assessment Supplementary Guidance would be welcomed in paragraph 2 (<i>subject to approval following consultation and endorsement</i>).	The Landscape Character Assessment is already referred to in the 2 nd paragraph of the chapter introduction.	None.
		Advise the removal of reference to sites of “National Wildlife Importance“ in paragraph 3 and replace with SSSI’s/ SWS’s and a hierarchical approach to their protection.	It is considered important to retain reference to sites of National Wildlife Importance as this encapsulates all national designations.	None.
		Question whether paragraph 4 is true. Whilst there are some notable individual examples of sustainable housing they are specific and isolated and do not represent general market housing that has come forward. Sentence suggests that development in the borough is already very low-carbon whereas it is probably heavily emitting conventional housing.	It is considered that the examples of low carbon development should be recognised and promoted to encourage developers to provide what is being required through the plan. This is something that is seeking to be achieved by the plan and should be retained.	None.
		4 th para: 6 th line down: superfluous “the” before “Redditch”.	Amend.	Amend error in text.

		Wording in paragraph 4 regarding renewables is incorrect. Reference could be made to opportunities for smaller scale and decentralised opportunities for renewables.	Agreed. This sentence should have read <i>“large-scale renewable energy”</i> .	Amend sentence to read <i>“large-scale renewable energy”</i> .
		Specific regard to the historic environment should be given in this chapter and its influence on the natural environment [see comments submitted to Redditch Preferred Draft Core Strategy 2009].	This chapter refers to all parts of the environment including the historic environment.	None.
R305	C John	Page 25, Para 4 Sentence 3 – reword to: <i>“traditionally lower than average carbon emissions”</i> .	Agreed sentence will be amended.	Amend <i>“traditionally lower than average carbon emissions”</i> .
		Sentence 8 – this section should be clarified. Worcestershire County Council have clarified that the use of large scale renewable energy within Redditch cannot contribute a major proportion of energy demand due to the physical constraints of the area, although there may be options in rural areas.	Agreed, this is referred to in this section. However the phrase “large scale” will be included to ensure readers are clear.	Amend sentence to read <i>“Worcestershire County Council have demonstrated that the use of large-scale renewable energy cannot be a major source of energy within the Borough.”</i>

		Small scale, or micro-generation renewable technologies, such as individual solar panels on new and existing dwellings, are a viable option to increase the sustainability of local energy use.	Agreed, this is encouraged through the emerging plan.	None.
--	--	---	---	-------

Policy 5 Green Infrastructure

Rep No.	Name	Summary	Officer Response	Officer Action
R067	Worcestershire Wildlife Trust	<p>Pleased to support the proposed GI policy and welcome the positive reference to wider sub-regional GI working.</p> <p>Would expect open space to represent at least 40% of overall land take in line with best practice guidance. In order for green space to work effectively it must permeate through the built environment forming meaningful corridors within and to the periphery of development. There may be a conflict between achieving this and achieving high density development.</p>	<p>Noted</p> <p>The delivery of Green Infrastructure in the Borough will be guided by a Green Infrastructure Strategy for Redditch Borough and, where appropriate, site specific Green Infrastructure Concept Statements.</p>	<p>None</p> <p>Complete Green Infrastructure Strategy and appropriate site specific Green Infrastructure concept statements.</p>
R126	Environment Agency	<p>Welcome the policy. The potential for flood risk benefits has not been mentioned; retained floodplains, Sustainable Drainage and woodlands and other natural habitats can all help to reduce the impacts of flooding. This is linked to Policy 3 on Flood Risk and Water Management.</p>	<p>Agreed. There should be reference to the potential flood risk benefits of GI and make links to the Flood Risk and Water Management policy.</p>	<p>Amend policy/reasoned justification to include reference to the flood risk benefits and links to the policy on Flood Risk and Water Management.</p>

R128	Natural England	<p>Pleased to see a GI policy and welcome reference to a Redditch Borough GI strategy and sub-regional GI framework. Suggest a reference to the definition of GI provided in the Glossary. For the sake of consistency, we recommend using the same definition as WCC.</p> <p>Recommend moving this policy further forward in the chapter.</p> <p>GI should be seen as an integrating framework which brings all the elements of the chapter together. The multifunctionality of GI should also be emphasised.</p> <p>Open space is part of the GI network and as such does not need to be separately named at the start of the policy. New open space should be strategically located to contribute to the GI network in order to increase its multifunctionality.</p> <p>The SA notes that the positive</p>	<p>Noted. A reference to the glossary definition can be inserted. The glossary definition will be amended to be the same as WCC.</p> <p>Agreed, policy will be moved to be the second policy in the chapter.</p> <p>Agree that linkages can be made to other policies in the strategy to further demonstrate the multifunctionality of GI.</p> <p>Agreed. Reference to open space will be removed from first sentence. Agree that reference should be made to the way that open space located in order to contribute to the wider GI network.</p> <p>Agreed. The policy/reasoned</p>	<p>Insert reference to glossary in introductory paragraph. Use same definition as WCC in glossary.</p> <p>Move GI policy to be second in chapter.</p> <p>Make linkages to other policies in introductory paragraph or reasoned justification as appropriate.</p> <p>Remove reference to open space in first sentence. Amend policy/reasoned justification to include reference to the location of open space in the GI network.</p> <p>Amend policy/reasoned</p>
------	-----------------	---	--	--

		<p>relationship between DPD Objective 1 on GI and SA Objective 11 on biodiversity and geodiversity can only be achieved if biodiversity is enhanced within areas of existing and future open space. Emphasising the multifunctional nature of GI should help to secure this, along with other multiple-wins. See Wyre Forest's policy CP14 for example of good GI policy.</p> <p>Would welcome a policy hook to help secure off-site GI provision.</p>	<p>justification will be amended to emphasise the multifunctionality of GI.</p> <p>The Green Infrastructure Strategy will provide evidence for CIL and therefore guide off-site provision if there is a proven need.</p>	<p>justification to emphasise the multifunctionality of GI.</p> <p>Complete Green Infrastructure Strategy for Redditch Borough.</p>
R180	Cllr Anderson	<p>Creating more green space within the boundary is both unnecessary and leading to unacceptable overcrowding. We have more than enough public open space; many are rarely used and expensive to maintain.</p> <p>Suggest that as much land as possible is put into private use, thus increasing the spacing between dwellings and reducing the potential for friction between</p>	<p>Not providing open space within development would be contrary to the aims of Planning Policy Guidance No.17. There is no local justification for not complying with national planning policy.</p> <p>Planning applications are submitted to change public open space into private space; the Core Strategy would not preclude this.</p>	<p>None</p> <p>None</p>

		neighbours. If most of this land is behind the buildings, it will reduce options for changing front gardens into parking spaces. This will add to biodiversity, in that gardens have a similar habitat to scrub and wood perimeters.		
R358	English Heritage	Welcome the commitment to produce a GI strategy and GI concept statements with input of relevant historic environment opportunities.	Noted	None
R378	WCC	<p>The policy is centered around open space and less on multi-functional benefits of green infrastructure.</p> <p>Within the reasoned justification PPS9 should be titled Biodiversity and Geological Conservation and not Nature Conservation.</p> <p>The reasoned justification could</p>	<p>The policy/reasoned justification will be amended to emphasise the multifunctional benefits of GI.</p> <p>Noted, the correct title for PPS9 should be used.</p> <p>These references can be inserted</p>	<p>Amend policy/reasoned justification to emphasise the multifunctional benefits of GI.</p> <p>Ensure correct title for PPS9 is used. This change would be subject to review following any relevant details emerging from the National Planning Policy Framework due to be introduced late 2011/early 2012.</p> <p>Insert references to</p>

		<p>also include references to the Worcestershire Access and Informal Recreation Strategy (AIRS) and ROWIP (Rights of Way Improvement Plan) in appropriate places.</p> <p>In 4th paragraph, first line, typo “be”.</p>	<p>into the reasoned justification.</p> <p>Noted</p>	<p>Worcestershire Access and Informal Recreation Strategy (AIRS) and ROWIP (Rights of Way Improvement Plan) in reasoned justification.</p> <p>Amend typing error.</p>
--	--	--	--	---

Policy 6 Settlement Hierarchy

Rep No.	Name	Summary	Officer Response	Officer Action
R030	WCC	<p>Support for policy, but with the incorporation of stronger policies on accessibility and sustainability</p> <p>Where strategic sites form Sustainable Urban Extensions to the Redditch urban area, the provision of a sustainable transport network is key. They should include provision for walking, cycling and public transport which effectively and efficiently link the development to key trip attractors and transport hubs. SUEs should be designed to provide sufficient densities of population to support financially viable passenger transport operation. Low density is therefore unsuitable. To secure high frequency, commercially viable bus-based systems requires 40-50 dph. Efficient, convenient and commercially viable rapid transit services are an essential criteria of</p>	<p>Support noted</p> <p>The CS does not make provision for Sustainable Urban Extensions. However, the Strategic Sites within the Borough and their specific policies included in the CS address the need for sustainable transport provision. Reference should also be made to CS Policy 4 – Sustainable Travel and Accessibility which aims to encourage more sustainable modes of transport throughout the Borough</p>	<p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		sustainable urban development		
R087	West Mercia Police	Support for Policy 6. It will ensure development is concentrated in a small number of locations which avoids a dispersed infrastructure pattern for emergency services and limits the potential for locations to be at the fringe of acceptable response times	Support noted	None
R091	Tetlow King	Support Policy 6. Recommend that all references to specific national planning guidance is removed and replaced with reference in supporting text to ' <i>up to date national planning guidance</i> '. This will ensure the Plan remains relevant and up to date	Support and re-wording suggestion noted.	Update policy text to reflect changing national planning policy framework
R180	Anderson	Policy does not give sufficient protection to the small settlements of Ham Green, Elcocks Brook, old Callow Hill and old Webheath. These communities have	The settlements of Ham Green, Elcocks Brook etc are primarily protected by Green Belt policy, which serves to protect their local character and limit development by size/mass and appropriateness to the	None

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>distinctive character which should be protected and enhanced in the same way as the two conservation areas.</p> <p>Old Webheath (incl. Crumpfields Lane, part of Heathfield Road and part of Church lane) should be renamed 'Heathfield' village, and developed as a distinctive community</p>	<p>surrounding area. Conservation Areas are designated for their special architectural and historic interest (English Heritage website). These hamlets do not offer sufficient architectural or historic interest to warrant Conservation Area designation</p> <p>This area forms part of the urban area and as such forms one of the urban area 'districts', which do have distinct and different characteristics throughout the Borough. As part of the urban fabric of the Borough, this area does not constitute 'village' status</p>	None
R316	Heyford Developments Ltd	Support for the Redditch urban area as the main focus for development but object to the inclusion of Astwood Bank and Feckenham as they are not as sustainable as urban extensions on the edge of Redditch. As such they should only meet a local housing need. The policy should	Support noted. Feckenham and Astwood Bank are not identified in Policy as sustainable urban extensions. The Policy clearly identifies the focus for these areas will be local needs only	None

Rep No.	Name	Summary	Officer Response	Officer Action
		be amended in accordance with advice contained in PPS3, para 53		
R353	Williamson	Consider that Astwood Bank offers a suitable direction for growth and the south west should be reconsidered	RBC does not consider the south west of the Borough to be a suitable direction for growth. The evidence to support this view is contained in the Study of Green Belt Land and ADRs within Redditch Borough, through RBC analysis of the WYG1 study areas, and by default through the RSS and WYG 1	None

Policy 7 Development Strategy

Rep No.	Name	Summary	Officer Response	Officer Action
GENERAL				
R010 R169	Barber Showell	Support for Policy 7	Noted	None
R024 R025	Theobald Barber	Against development on ADR land ever	The ADRs in Redditch were identified in previous Local Plan reviews as representing the most suitable locations for meeting Redditch's longer term growth needs. National planning policy still advocates this approach. Redditch is at a point where it can no longer find sufficient suitable development sites within the Borough without having to consider using the ADRs to meet targets. Studies are currently being undertaken to identify any constraints that would preclude ADR land from development. If the Studies reveal that development on ADR land is no longer appropriate, then the position regarding these sites will be reconsidered. Furthermore, in the light of the emerging Localism Bill, and the opportunity for local planning authorities to set their own	No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute towards the Borough's development targets Amend policy accordingly in light of evidence in said studies

Rep No.	Name	Summary	Officer Response	Officer Action
			evidenced development targets, studies are also being undertaken to determine the levels at which our development targets should be set. If as a result of the constraints studies, there are no identified constraints to development on ADRs then they will be considered to meet the Borough's development targets, either during this Plan period or in the future in preference to further Green Belt development	
R025	Barber	Against development on Green Belt	Response dealt with under Responder's representation to Policy 30	None
R030	WCC	General support for the policy, however suggest alterations to Policies 4, 29, 30, 31 and 32	Specific additions to other policies have been addressed under the appropriate policy	None
R087	West Mercia Police	Policy does not provide a robust and credible basis for the Council to secure the necessary infrastructure to enable sustainable development in the Borough	Agreed, a stand alone infrastructure policy will be inserted into the next draft of the Core Strategy based on the Infrastructure Delivery Plan	No change to this policy. Draft infrastructure policy for next draft of the Core Strategy
		Suggests a dedicated	There should be no need to	None

Rep No.	Name	Summary	Officer Response	Officer Action
		Infrastructure policy and reference to it in Policy 7	cross reference an Infrastructure Policy to Policy 7 as development proposals should take account of the Core Strategy policies in a holistic manner	
R091	Tetlow King	<p>Policy requires clarity as to how the 'more sustainable' sites will be brought forward first</p> <p>A definition of how the 'most sustainable sites' are identified would be useful</p> <p>The Council should indicate that maintaining a five year land supply will remain its priority and that in doing so it may be necessary to bring forward sites in less sustainable locations to achieve this</p> <p>Paragraph 3 is too ambiguous, failing to set out what information is likely to be required by developers and what scales of development would trigger infrastructure requirements. May cause delay to development delivery. May be useful to signal</p>	<p>Policy makes reference to the urban area and strategic sites. The manner in which these could be brought forward could be addressed through site specific SPDs, which is already referenced in the policy</p> <p>Agree</p> <p>A stand alone infrastructure policy will be inserted into the next draft of the Core Strategy based on the Infrastructure Delivery Plan and reference could be made in Policy to the strategic sites</p>	<p>None</p> <p>Reference to five year land supply in policy</p> <p>No change to this policy. Draft infrastructure policy for next draft of the Core Strategy</p> <p>Add reference in Policy to Strategic Sites</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>that information regarding infrastructure provision will be set out in a CIL charging schedule. Indication that CIL should be set out in a separate policy</p> <p>Further detail should also set out the point at which work on an SPD is likely to commence where likely shortfalls in housing supply are identified</p> <p>Further detail should be set out to define how/when ADR sites will be reviewed. Indicating that they will be subject to DC policies may not be sufficient to protect them from early development. Further certainty as to their suitability and timing for housing development is strongly recommended</p>	<p>Until monitoring indicates that there are shortfalls in delivery that need addressing via proactive planning matters then it is not possible to indicate when work to address these issues would commence</p> <p>See Officer Response at R024</p>	<p>None</p> <p>No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute towards the Borough's development targets</p> <p>Amend policy accordingly in light of evidence in said studies</p>
R092	Gallagher Estates Ltd	Supports the aspiration that all strategic sites can come forward immediately and supports the Council's concerns over the deliverability of the A435 and	<p>Support for Strategic Site delivery noted</p> <p>A review of the A435 ADR will be carried out to ascertain the</p>	<p>None</p> <p>No change to policy until evidence collected, then</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Webheath ADRs</p> <p>In the absence of ADR delivery, the Development Strategy should seek to deliver the portion of housing yield attributed to those sites at alternative, immediately available and deliverable sites in order to meet the RSS EiP Panel recommendation of 4000 dwellings within Redditch by 2026</p>	<p>development potential within this plan period and/or beyond</p> <p>This matter is better addressed under Policy 8 – Housing Provision, where the housing target will be explored in greater detail alongside the consequences of the ADRs on target delivery. Furthermore, the locally derived target in the light of the Localism Bill/ revocation of RSSs</p>	<p>consider ADR evidence to determine their suitability to contribute towards the Borough’s development targets</p> <p>Refer to Policy 8</p>
R126	Environment Agency	<p>Query the phrasing that “all strategic sites for development can come forward <u>immediately</u> in accordance with the development plan”, with respect to policy paragraph 3. Has infrastructure information been formulated in considering all strategic sites for development that are able to come forward immediately (PPS 12 Para 4.8-12 refers)?</p> <p>Consider that policy should phase development in line with any required foul drainage infrastructure upgrades and</p>	<p>Para 3 of policy is clear on this point and necessary infrastructure would be displayed in the IDP</p>	<p>Reference to IDP</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		ensuring that foul flows can only enter the system once the upgraded work is complete		
R129(A))	Persimmon Homes	Broadly supports the policy, but considers that paragraph two of the policy should clarify that reference to the most sustainable sites being developed early in the Plan period should clarify that this includes the strategic sites	Support for policy noted and agree amendments with reference to strategic sites	Change reference to development sites focused on the urban area of Redditch
R129(B))	Persimmon Homes/ Miller Homes/ S&RD	Strongly supports the statement in the policy which states that identified strategic sites are available immediately for development	Support noted	None
		Agrees that the GB boundary should be altered in the location of Brockhill East and Brockhill West, within the Borough boundary	Support noted. Refer to responses to Policies 29 and 30	None
		Considers that reference to ADRs being safeguarded to meet longer term development needs beyond 2026 should be altered to represent an appropriate end date for the Plan	Noted and agreed. CS text will be altered to reflect an appropriate end date in order that at least 15 years from adoption to the end of the plan period can be demonstrated	Extend CS plan period to reflect a 15 year period from adoption and ensure that all relevant references in the CS reflect a new end

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>period given the 15 year post adoption requirement for identification of developable land set out in PPS3</p> <p>Supports the maintenance of ADR status for Webheath and A435. Reference to ADRs becoming available for development beyond 2026 needs to be aligned with any revised Plan end date</p> <p>BORLP3 includes a development control policy for existing ADRs. There is no policy proposed in the CS which explains what policy is proposed to apply to these areas during the CS Plan period</p>	<p>A review of the A435 ADR will be carried out to ascertain the development potential within this plan period and/or beyond.</p> <p>Support noted with regard to the Webheath ADR.</p>	<p>date</p> <p>No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute towards the Borough's development targets</p>
R180	Anderson	<p>The strategy needs to recognise that there are three brownfield sites that should take precedence over other greenfield sites, namely:</p> <p>Land beyond the southern ring road boundary from Trafford Park up to the former Liberal</p>	<p>The Council cannot demonstrate a five year supply of deliverable land based solely on brownfield sites and needs to rely on available and deliverable greenfield sites. With respect to the brownfield/ regeneration sites suggested:</p> <p>Land in this location has been identified in the Office Needs Assessment as appropriate for</p>	<p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Club</p> <p>North west quadrant (including land as far as the transport interchange)</p> <p>Land between Hewell Road swimming pool to Oak Tree Avenue and removing the Cornish flats along Salters Lane</p> <p>The first two could provide for between 500 and 700 dwellings</p>	<p>office uses or alternatively, all town centre related uses. However residential capacity is less preferable in this location when other land use issues would take priority</p> <p>The north west quadrant has been identified for redevelopment as part of the Town Centre Strategy. This site has been identified in the SHLAA as having some residential potential but capacity would be constrained by preference for other town centre uses</p> <p>Officers will pursue the Salters Lane option and report back via the SHLAA update</p> <p>The above responses indicate that capacity for housing may not be as high as 500-700 dwellings. Officers will continue to pursue the redevelopment of brownfield sites within the urban</p>	<p>None</p> <p>Consider suitability of Salters Lane site for redevelopment and contribution towards housing target through SHLAA refresh</p> <p>Continue to pursue brownfield/ redevelopment sites as appropriate, through the SHLAA updates</p>

Rep No.	Name	Summary	Officer Response	Officer Action
			area that could contribute towards the housing target	
R378	WCC	<p>Consider that paragraphs 1 and 2 are conflicting. Para 1 states that strategic sites can come forward immediately whilst para 2 states that the most sustainable sites must come forward earlier in the plan period</p> <p>Reference to policy 6 in policy 7 needs clarifying as Redditch urban area is the only settlement within the hierarchy that caters for all demand, AB and Feckenham are for local needs only</p>	<p>Paragraph 1 refers solely to strategic sites, whilst paragraph 2 refers to all other residential development sites within the Borough. Alterations to policy wording may aid clarity and will be pursued</p> <p>See officer response at R091</p>	<p>Reword policy to clarify which sites should come forward and when during the Plan period</p> <p>See officer action at R091</p>
R379	Turley Associates (Scottish Widows Investment Partnership)	Release of greenfield land for development is supported but with a clear preference to release the most sustainable sites first	Support noted. Policy clearly states that sustainable sites should come forward earlier in the plan period. See officer response at R091	See officer action at R091
A435 ADR				
R053	Timothy	Believe the ADR has potential for some limited development	A review of the A435 ADR will be carried out to ascertain the development potential within this plan period and/or beyond.	No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute towards the Borough's

Rep No.	Name	Summary	Officer Response	Officer Action
				development targets
R084	Cunningham	<p>Agree that development at A435 ADR is currently untenable, although understands that this may be reviewed after 2026.</p> <p>Matchborough allotments provide over 70 families with a range of health, social & community benefits. The area is rich in wildlife and is a valuable asset to the local community of Matchborough.</p>	<p>A review of the A435 ADR will be carried out to ascertain the development potential within this plan period and/or beyond.</p> <p>Current local planning policy is to retain allotments and it is envisaged that this will apply to the A435 ADR</p>	<p>No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute towards the Borough's development targets</p> <p>None</p>
R113	Stallard	Leave beyond 2026.	A review of the A435 ADR will be carried out to ascertain the development potential within this plan period and/or beyond.	No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute towards the Borough's development targets
R114	Hattersley	<p>Any future factory or warehouse development needs to be kept to the west of Claybrook Drive due to noise and bad smells pollution being carried into Mappleborough Green.</p> <p>Tree plantations along Claybrook Drive need to be retained,</p>	<p>The A435 ADR is east of the Claybrook Drive, there is already employment development to the west of Claybrook Drive.</p> <p>A buffer between any new development and existing properties would need to be</p>	<p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>preserved and improved.</p> <p>What is 'affordable housing'? High density blocks do not fit into the pleasant scenery surrounding Redditch. Higher quality housing should be provided around Broadacres Farm.</p> <p>Damage to local property values will be considerable.</p> <p>Has sufficient research been carried out on traffic flows on the A435 and Claybrook Drive at peak periods, and has consideration been given to the additional traffic impact from the large number of new homes and the development proposed?</p>	<p>maintained.</p> <p>Affordable housing is defined in Planning Policy Statement 3: Housing as "...social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market." (page 25). Affordable housing should be 'pepper-potted' throughout the development. Density of housing development would be between 30 and 50 dwellings per hectare in accordance with emerging Core Strategy policy.</p> <p>Property values are not a material planning consideration.</p> <p>Yes, a transport assessment has been completed which will inform the infrastructure needs for future development.</p>	<p>None</p> <p>None</p> <p>Complete Infrastructure Delivery Plan for the Core Strategy.</p>
R117	Cotton	This is one of the only areas within the Redditch boundary	A review of the A435 ADR will be carried out to ascertain the	No change to policy until evidence collected, then

Rep No.	Name	Summary	Officer Response	Officer Action
		that have the infrastructure to take any development.	development potential within this plan period and/or beyond.	consider ADR evidence to determine their suitability to contribute towards the Borough's development targets
R122	Carter	Agree it is undeliverable (as per WYG Report) and breaches Planning Principles.	It is not clear what is meant by the statement that it 'breaches planning principles'. A review of the A435 ADR will be carried out to ascertain the development potential within this plan period and/or beyond.	No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute towards the Borough's development targets
R130 – R161	Balls & Scrimshire obo Allensmore Close Residents	Support the continued designation of the A435 corridor as an Area of Development Restraint. Strong objections would be raised to further consideration of any development in this area prior to the adoption of the Core Strategy.	A review of the A435 ADR will be carried out to ascertain the development potential within this plan period and/or beyond. It should be noted that the designation of land as an Area of Development Restraint means that it will be safeguarded to meet possible long term development requirements beyond the current plan period.	No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute towards the Borough's development targets
R202	White	A435 ADR acts as a wildlife corridor and should be preserved.	A review of the A435 ADR will be carried out to ascertain the development potential within this plan period and/or beyond. An ecological assessment would be	No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute

Rep No.	Name	Summary	Officer Response	Officer Action
			required with a planning application for development on this site.	towards the Borough's development targets
R380	Jarrett	Agree site is undeliverable.	A review of the A435 ADR will be carried out to ascertain the development potential within this plan period and/or beyond.	No change to policy until evidence collected, then consider ADR evidence to determine their suitability to contribute towards the Borough's development targets
Webheath ADR				
R060	Pulsford	Supports current plans not to build on Webheath ADR. Building on Webheath ADR would cause foul drainage and access problems in the immediate vicinity. There would be an increased risk of flooding in low lying areas such as Feckenham and Himbleton. Surface water run-off would increase water levels in the Swansbrook and Bow Brook	Support Noted A Transport Assessment which considers Webheath ADR will form part of the evidence base to inform the emerging Plan. A Water Cycle Study Update and Level 2 Flood Risk Assessment are also being completed which will consider flood risk and foul drainage. This evidence will feed into the emerging plan.	None
R078	Feckenham Parish Council	Supports Policy 7 and its recommendation to safeguard Webheath ADR from consideration until post 2026	Support Noted	None

Rep No.	Name	Summary	Officer Response	Officer Action
		Supports the requirement that any minor development in the Feckenham area will be subject to policies controlling development in the open countryside	Support Noted	None.
R007 R008 R009 R010 R012 R015 R016 R018 R019 R020 R021 R022 R023 R024 R029 R036 R037 R038 R039 R040 R041 R044 R045 R046 R048	Cardew Emms Hughes Barber Lewis Batty Rowell Coombs Morris Baker Carpenter Clark Phillpotts Theobald Ostroumoff Bourne Bourne Smith Allen Best Allbutt Smith Lippett Haigh Haigh	Support for Policy 7. Webheath is undeliverable. Object to development. Due to the following reasons: Transport/ Access - Poor and limited road infrastructure narrow lanes, no footpaths, congested and dangerous roads (WYG 2009)	A Transport Assessment which considers Webheath ADR will form part of the evidence base to inform the emerging Plan, however this level of detail would need to be completed by a Site Specific Transport Assessment which would be done at a more detailed stage.	None
		There are issues on Crumpfields Lane, Green Lane, Church Road, Curr Lane, Foxlydiate Lane, Blackstich Road Heathfield Road and Middlepiece Drive	Key junctions will be assessed as part of the Transport Assessment; however this level of detail would need to be completed by a Site Specific Transport Assessment which would be done at a more detailed stage.	Send comment to the Highways Department at Worcestershire County Council for investigation.
		HGVs use lanes as a 'rat run' and there is extensive farm	This is a Highways matter and should be referred to	None

Rep No.	Name	Summary	Officer Response	Officer Action
R049	Haigh	traffic particularly at harvest and winter times	Worcestershire County Council for investigation.	
R050	Haigh			
R051	Mason	Poor transport links – no public transport and not well linked to cycleways and footpath systems (WYG 2009), combined footpath and cycle route along Church Road	Improving transport links within the Borough is a key objective of the emerging plan. Increasing transport links within the Borough is also improved via other methods such as the emerging Choose How You Move 2 project. The accessibility of the site is considered through the Transport Assessment.	This comment will be sent to the Highways Department at Worcestershire County Council.
R052	Sinclair			
R054	Pulsford			
R057	Homer			
R060	Evans			
R061	Porteous			
R063	Hill			
R065	Griffiths			
R067	Feckenham Parish Council			
R074	White			
R078	Ramsay			
R080	Davies			
R082	Hawkins			
R101	Smith			
R108	Smith	All living in new housing would need to commute to work by car as there is no alternative, increasing the rush hour traffic and increasing the carbon footprint of Webheath.	Accessibility is a key issue for the emerging plan. Increasing transport links within the Borough is also improved via other methods such as the emerging Choose How You Move 2 project. The accessibility of the site is considered through the Transport Assessment.	None
R109	Bartley			
R116	Styler			
R118	Mills			
R120	Hughes			
R123	Heaselgrave			
R124	Bedford-Smith			
R172	Styler			

Rep No.	Name	Summary	Officer Response	Officer Action
R174 R176 R177 R202 R305 R310 R311	Styler White Hatton Hatton Rood Bonham Smith	<u>Flood risk</u> Severe flood risk (Royal Haskoning 2009)	A Water Cycle Study Update and Level 2 Flood Risk Assessment are also being completed which will consider flood risk and foul drainage. This evidence will feed into the emerging plan.	None
R312 R314 R318 R343 R344 R345 R346 R347 R348 R349	Newburn Flowers Sims Crupton Miller Rose Warby Warby Khoury Kloetzli	Development here will increase risk of flooding in Feckenham (Royal Haskoning 2009) (particularly as Feckenham is one of only two Conservation Areas in the Borough Feckenham is affected by development at Webheath particularly in terms of excess rainfall)	A Water Cycle Study Update and Level 2 Flood Risk Assessment are also being completed which will consider flood risk and foul drainage. This evidence will feed into the emerging plan.	None
R350 R351 R352 R354 R355 R356 R357	Kloetzli Kloetzli Anderson Bradshaw Edmunds Sinclair McQuaid	Civil Engineer report submitted which states that runoff will be 6 times greater when the area is developed	A Water Cycle Study Update and Level 2 Flood Risk Assessment are also being completed which will consider flood risk and foul drainage. This evidence will feed into the emerging plan.	None
R381 R383 R384 R385 R386 R387	McQuaid McQuaid McQuaid Cale Rose Moxon	If the southern part of the ADR is built upon then 6 times the amount of water will emanate from the development	A Water Cycle Study Update and Level 2 Flood Risk Assessment are also being completed which will consider flood risk and foul drainage. This evidence will feed into the	None
R392	Waldron			

Rep No.	Name	Summary	Officer Response	Officer Action
			emerging plan.	
		The site is hilly and lower parts will be affected by flooding after building	A Water Cycle Study Update and Level 2 Flood Risk Assessment are also being completed which will consider flood risk and foul drainage. This evidence will feed into the emerging plan.	None
		The soil is acid, loam and clay, drainage is poor	A Water Cycle Study Update and Level 2 Flood Risk Assessment are also being completed which will consider flood risk and foul drainage. This evidence will feed into the emerging plan. A Site Specific Flood Risk Assessment and Water Cycle Study would outline measures to ensure how they type of soil has been considered when evaluating the site.	None
		<u>Drainage/ Sewage</u> Difficult foul drainage (need to pump sewerage increasing energy costs to home owners (WYG 2009)). If developed Webheath ADR has to have two foul drainage mains, one gravity main and second as pressure main with risk of leaking joints and pollution. Two foul storage	The Water Cycle Study Update being prepared will recommend the appropriate foul drainage system as part of the site evaluation	None

Rep No.	Name	Summary	Officer Response	Officer Action
		cisterns to meet building regulations would be needed containing 24 hour storage in event of pump failure and breakdown of 'protected supply'		
		Dispute as to whether the drainage systems on Church Road are connected to pipes which drain into the sewerage network. Concern that excess water is draining into fields and trees	This comment will be sent to the Drainage Engineer for investigation	Send comment to Drainage Engineer for investigation and comment
		Residents currently on septic tanks which drain into gardens at the rear Crumpfields Lane	This is a pre-existing problem which has the potential to be rectified through wider system upgrades by Severn Trent	None
		The additional water emanating from any development will cause the overflow drains which include rainwater and septic water to run off causing a health hazard	A Water Cycle Study Update and Level 2 Flood Risk Assessment are also being completed which will consider flood risk and foul drainage. This evidence will feed into the emerging plan	None
		<u>Contamination</u> Environmental concerns expressed by Feckenham Parish Council on development of Webheath ADR within the Bow Brook Catchment	Water Quality has been assessed through the A Water Cycle Study Update and Level 2 Flood Risk Assessment which are currently being completed	None

Rep No.	Name	Summary	Officer Response	Officer Action
		Threat of pollution downstream in Feckenham	Water Quality has been assessed through the A Water Cycle Study Update and Level 2 Flood Risk Assessment which are currently being completed	None
		Concerns over contaminations of the Curr Lane Wells and their water gathering grounds	Water Quality has been assessed through the A Water Cycle Study Update and Level 2 Flood Risk Assessment which are currently being completed	None
		Concerns over dangers of portage of toxic material from Webheath works at centre of ADR over Great Hawkins and Foxlydiate Lanes	This would need to be investigation further should development be considered suitable for the site.	None
		<u>Carbon emissions</u> Increase carbon emissions – against Redditch Borough Council and Government Policy. No reduction in emissions if development does ahead	It is the purpose of planning to balance all conflicting issues; the need to reduce carbon emissions is a high priority as is supplying a sustainable supply of housing. It is a key priority of the emerging plan to ensure all new development minimizes its contribution to carbon emissions	None
		<u>Infrastructure</u> Poor supporting infrastructure (doctors, shops etc)	Infrastructure Delivery Plan is currently being completed which will assess where the deficiencies are within the	None

Rep No.	Name	Summary	Officer Response	Officer Action
			Borough with regard to infrastructure.	
		Poor communications (public transport etc (WYG 2009)	Accessibility is a key issue for the emerging plan. Increasing transport links within the Borough is also improved via other methods such as the emerging Choose How You Move 2 project.	None
		Far from employment sites and no public transport (WYG 2009)	Accessibility is a key issue for the emerging plan. Increasing transport links within the Borough is also improved via other methods such as the emerging Choose How You Move 2 project.	None
		Who will fund the new school that will be needed?	The costs for any infrastructure that would be required as part of any new development would be borne by the developer. The Borough Council is currently completing infrastructure work which will assess where the deficiencies are within the Borough.	None
		Where are the jobs for the new estate?	The emerging plan will provide an employment target which will provide what is required in the Borough to 2030.	None

Rep No.	Name	Summary	Officer Response	Officer Action
		<u>Landscape/ Environmental</u> Highly visually sensitive (WYG 2009)	A landscape character assessment has been completed which looks at the sensitivity of the rural area, this forms part of the evidence base and the Sustainability Appraisal which is required as part of the emerging plan.	None
		Development would be visually intrusive (WYG 2009)	A landscape character assessment has been completed which looks at the sensitivity of the rural area, this forms part of the evidence base and the Sustainability Appraisal which is required as part of the emerging plan.	None
		Loss of habitat for a wide variety of wildlife, mammals, birds and invertebra currently residing in the area	This will form part of the Sustainability Appraisal which is required as part of the emerging plan.	None
		There would be a loss of amenity to horse riders, walkers and dog owners who use Foxlydiate Lane, Church Rd, Pumphose Lane and Crumpfields Lane to gain access to rural country lanes, bridle paths and footpaths	Any public rights of way would be maintained on any site.	None

Rep No.	Name	Summary	Officer Response	Officer Action
		Webheath is a semi rural area and the areas of Church Road, Green Lane and Crumpfields Lane are different to other areas of Redditch. Any further development will ruin semi rural aspect.	Crumpfields Lane falls within the Webheath Area of Development Restraint. Green Lane falls within both the ADR and then travels east into the Green Belt.	None
		<u>Designation</u> Webheath ADR should be treated as an extension to the neighbouring Green Belt	Noted	None
		The ADR should be returned to Green Belt.	The Webheath ADR has never been part of the Green Belt.	None
		Webheath should be returned to ADR land.	Noted	None
		Webheath ADR should remain undeveloped as there are areas in Redditch where development would have a lesser environmental impact	A Sustainability Appraisal is completed alongside the emerging plan which allows potential development sites to be compared according to sustainability objectives. This forms part of the evidence base which feeds into the emerging plan.	None
		<u>Coalescence of settlements</u> Provides a 'bridgehead' into the Western areas refused by	The Webheath ADR is a designation in its own right and	None

Rep No.	Name	Summary	Officer Response	Officer Action
		Planning Inspectors as a threat to coalescence (contrary to PPG)	would not influence the potential development of surrounding areas as they have their own designation which decisions would be made against	
		<u>Other</u> One of the last areas with a 'village' feel	The area is not designated as a village settlement, although it may feel this way it is not designated as such and therefore this has no bearing on planning decisions	None
		Bordesley is a more suitable alternative (gravity drainage, close proximity to employment sites, close to M42, leisure facilities and Town Centre)	Noted	None
		View from south west will be a housing estate instead of fields	The right to a view is a not a planning consideration	None
		Far from Redditch town centre (WYG 2009) -Redditch is 45 minutes walk away	Not all development can be located within the Town Centre as there is not the capacity for this. The accessibility of the area has been considered through the Accessibility Assessment which forms part of the wider Transport Assessment, this document feeds into the evidence base of the emerging	None

Rep No.	Name	Summary	Officer Response	Officer Action
			plan and would therefore be taken into account.	
		Concern that now Upper Norgrove House has been vandalised this will trigger development. Question whether the building will be re-built or demolished	The status of Upper Norgrove House has no bearing on the future of the Webheath ADR, they can be developed independently if the status changes.	None
		Webheath has reached saturation point	There is no context provided to this comment in terms of the specific saturation point being referred to	None
		Do not support policy 7 which says that ADRs will be reassessed	Noted	None
R004 R053	Chawner Timothy	Support for development of the Webheath ADR (with assumption that all issues are solved) and support for affordable housing to be located in this area	Noted	None
		Development at Webheath would not be harmful to infrastructure or residents	Noted	Noted
R064	J Paxton & D Johnson OBO The Diocese of Worcester	Although development on this site is postponed until after 2026 thought must be given to the environmental impact and to issues of access and community facilities	Agreed. There are various studies which feed into the evidence base of the emerging plan which consider all of these issues, including a Transport Assessment and Infrastructure	None

Rep No.	Name	Summary	Officer Response	Officer Action
			work	
		Current infrastructure seems inadequate for such a significant development	The Infrastructure Delivery Plan is currently being completed which will assess where the deficiencies are within the Borough with regard to infrastructure.	None
R096	Griffin	Must retain a Green Belt buffer between Webheath and Bromsgrove to protect wildlife, amenities for leisure, farmland for future food production and reducing pollution	There is no intention or proposal to allow Bromsgrove and Webheath to merge.	None
R106	Jobson	The Webheath area earmarked for possible development should be fully investigated as this area would appear to cause less damage to landscape and overall environment because of the size of this open space	Noted	None

Rep No.	Name	Summary	Officer Response	Officer Action
R125	K Ventham OBO Barton Willmore OBO Barratt Strategic and Taylor Wimpey UK Ltd	With regard to the suggestion that the Webheath ADR is not deliverable the two issues are considered: <u>Transport</u> No highways evidence since the publication of the WMRSS Panel Report or alongside the draft Core Strategy to substantiate the claim that there are questions over transport delivery	A Transport Assessment has been completed which will feed into the evidence base for the emerging plan.	None
		The Council have been in attendance with the developer and County Council when the transport strategy of the site was agreed	The Borough Council were in attendance at transport meetings at the County Council, however these meetings discussed potential access points for the area and did not agree a transport strategy. It should be noted that at these meetings it was not agreed that the site would be a development site; the status of the area was not discussed.	None
		The County Council were unaware that the Borough had any concerns in respect of this site and have confirmed that transport does not represent a constraint to delivery (discussed further in Delivery Document)	The County Council advised that further work would be required on the area with regard to transport, should the area be deemed a suitable development site.	None

Rep No.	Name	Summary	Officer Response	Officer Action
		<p><u>Waste Water Infrastructure</u> Conclusions in this respect appear to have been drawn from the flawed White Young Green Report (2009) where it was suggested (with no evidence) that the foul sewerage capacity would prevent the site from being delivered (quote from Panel Report provided) (this matter is discussed further in the Delivery Document)</p>	<p>Officers are aware of foul sewerage issues due to existing knowledge of the site. A Water Cycle Study Update is currently being completed which will advise on the appropriate solution for foul sewerage.</p>	<p>None</p>
		<p>Severn Trent Water were commissioned to review and consider the options for connecting foul water flows into the existing foul water sewerage systems. The results suggest that the existing foul sewer and pumping station in Church Road have limited available spare capacity however the report acknowledges that there is sufficient capacity for up to 350 dwellings. It is advised that a connection from the proposed development is allowed to connect the existing public foul water sewer at either Church Road or Springvale Road. Therefore assertions made in</p>	<p>From the response received by Severn Trent it is acknowledge that there is limited capacity and an issue with the foul sewerage system in this location. If it is that only half of the site is deliverable then the Borough Council needs to decide on the strategic benefits of the release of the ADR. The Water Cycle Study will outline the most appropriate sewerage disposal solution. In additional to Severn Trent Water the Local Drainage Engineer must also be satisfied with the solution proposed for each area.</p>	<p>None.</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		respect of the deliverability of this site are unfounded and unsupported by any robust or credible evidence base given that the respective statutory bodies have raised no objection		
		In addition, in the Reasoned Justification to Policy 29 (Brockhill East) it is noted that upgrades to the existing foul drainage system are required to ensure sufficient capacity; the detailed extent of the flood zone for the site is unknown and investigation is required into potential sand and gravel deposits. This appears to be a far greater level of 'unknowns' than for land at Webheath. It is therefore evident that an inconsistent approach is being applied to the treatment of sites	Supporting material has been supplied to the Borough Council with regard to this site from the agents which details this information. No such information as provided by the agents for the Webheath area in advance of the consultation period. It is critical that the sites contained within the emerging plan are sustainable and deliverable. With regard to Brockhill the upgrades required are local upsizing of the diameters of the pipes, this is not a significant foul drainage issue as at Webheath.	None
		<u>Green Belt Land</u> The draft Core Strategy proposes the release of land within the Green Belt as opposed to the utilization of an existing ADR site	If a site is considered to be undeliverable it will not be proposed as a development site in the emerging plan, regardless of whether the site is ADR or Green Belt.	None

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>PPG 2 (Annex B) states that safeguarded land should be genuinely capable of development when needed etc. the rebuttal evidence to Local Plan No.3 states that the ADR is a suitable location for development. The Local Plan Inspector also considered development of Webheath ADR to be suitable. As such we do not consider that there has been any change in planning legislation or planning policy which would result in a different view emerging of the suitability of this site for development. The 2010 SHLAA update confirms that any such issues in respect of this site are likely to be able to be overcome by developer contributions. The Sustainability Appraisal fails to provide an adequate or balanced assessment of alternative options. As such there is insufficient evidence to demonstrate that the identified Strategic Sites are more sustainable than Webheath.</p>	<p>It is clear at the national level that the ADR designation should be reviewed for each plan period, and having an ADR designation does not automatically roll forward to the next plan period.</p>	<p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		The utilisation for the ADR sites in advance of the Green Belt release was also supported by the Campaign to Protect Rural England (West Midlands) in their submissions to the RSS EiP (quote provided)	It is clear at the national level that the ADR designation should be reviewed for each plan period, and having an ADR designation does not automatically roll forward to the next plan period.	None
		Quote also provided from PPG2 which request exceptional circumstances for Green Belt release	Exceptional circumstances existed for the Green Belt release.	None
R390	Blakeway	Webheath is not undeliverable. Only considered undeliverable due to financial reasons, sewerage and logistics. Builders should take the cost of building	Developers are required to support the costs of any development they wish to pursue.	None
R391	R Middleton OBO Brockhill Action Group	No evidence that Webheath ADR cannot be brought forward in the current plan period. Concern that Council has reacted to pressure groups concerning development at Webheath as no evidence has been produced to support 'technical issues' that have emerged. Transport infrastructure has never been as insurmountable issue at Webheath ADR and was rejected by the Planning	The emerging plan is supported by a emerging evidence base and decisions are made on the most recent evidence available at the time and local knowledge. Transport and sewerage considerations for this area were lacking and will be informed by a Transport Assessment and a Water Cycle Study Update.	None

Rep No.	Name	Summary	Officer Response	Officer Action
		Inspector during Local Plan No.3 enquiry. Not aware of any robust evidence to show otherwise from statutory consultees.		

Policy 8 Housing Provision

Rep No.	Name	Summary	Officer Response	Officer Action
R002	Barnett	There are alternative sites [other than Brockhill Green Belt] which are more than sufficient to meet any development needs. The existing ADR options have not been fully exhausted.	Based on evidence in the SHLAA, there are insufficient development sites available to meet the target of 3200 dwellings within the Borough without taking consideration of greenfield, ADR and Green Belt land into account	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing
R003	Lee			
R017	Dudley			
R075	Battle			
R081	Garner			
R199	Shah			
R200	Turner			
R201	Whitehouse			
R203	Mahmood			
R204	Mahmood			
R205	Hussain			
R206	Bibi			
R207	Butt			
R208	Hussain			
R209	Zateer			
R210	Achtar			
R211	Bowers			
R212	Ali			
R213	Uddin			
R214	Wilkes			
R215	Hashid			
R216	Mukhtar			
R217	Shabbin Khan			
R218	Shah			
R219	Rehman			
R220	Hussain	There is no compulsion on the		

Rep No.	Name	Summary	Officer Response	Officer Action
R221	Ahmed	Council to develop on GB and Policies 29 and 30 should be amended accordingly	should identify sufficient specific deliverable sites for housing in order to ensure that there is a continuous five year supply of deliverable sites (PPS3, para 57, NPPF para 109) and identify sufficient land to enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of provision set out in the RSS (PPS3, para 53, NPPF para 109). In light of the emerging Localism Bill, housing targets still need to be set, albeit locally derived. The target in the RPDCS of 3200 needs to be revisited, based on robust and credible local evidence. Any target in the region of the current 3200 dwellings, will necessitate use of Green Belt land. PPG2, para 2.6 (NPPF para 137) states that once Green Belt boundaries have been approved, they should be altered only in exceptional circumstances. Any Green Belt alterations will need to satisfy the Secretary of State that the local authority has considered opportunities for development within	
R222	Younis			
R223	Waheed			
R224	Noble			
R225	Younis			
R226	Younis			
R227	Younis			
R228	Bi			
R229	Mukhtar			
R230	Hussain			
R231	Mahmood			
R232	Mahmood			
R233	Wheate			
R234	Wheate			
R235	Wheate			
R236	Jones			
R237	Morgan			
R238	Shakespere			
R239	Jones			
R240	Lofthouse			
R241	Ellis			
R242	Oakes			
R243	Hussain			
R244	Hadley			
R245	Few			
R246	Henderson			
R247	Smart			
R248	Hudson			

Rep No.	Name	Summary	Officer Response	Officer Action
R249	Rani		the urban areas contained by and beyond the Green Belt. Redditch's urban area is completely constrained by Green Belt. Officers consider that all 'deliverable' opportunities for development within the urban area have been considered (refer to SHLAA). There is insufficient 'deliverable' land available within the urban area to meet the 3200 dwelling target, which implies the need to reallocate Green Belt land for development. However, given that the housing target needs to be revisited in light of the emerging Localism Bill, and emerging/ imminent evidence to determine the suitability of Webheath ADR and A435 ADR for development, officers will reconsider the need to allocate Green Belt land to meet development targets	
R250	Hafiz			
R251	Naseem			
R252	Naseem			
R253	Jehangis			
R254	Hanif			
R255	Gray			
R256	Asif			
R257	Lees			
R258	Harvey			
R259	Nazir			
R260	Nazir			
R261	Imitiaz			
R262	Gosling			
R263	Kousaur			
R264	Imitiaz			
R265	Ali			
R267	Aziz			
R268	Aziz			
R269	Hussain			
R270	Hussain			
R271	Hussain			
R272	Hussain			
R273	Barber	Consider that the land at Brockhill (east of the railway) is suitable for housing development and are unclear why it does not feature in the RPDCS	Officers are aware that emerging Core Strategy Policy 29 – Brockhill East needs to make more specific reference to land either side of the railway line and employment use	None
R274	Zafar			
R275	Zafar			
R276	Zafar			
R277	Zafar			

Rep No.	Name	Summary	Officer Response	Officer Action
R278	Zafar		<p>needs to be widened from B1 (office) to include opportunities for other B1 uses such as research and light industry. However, the amount of land required to meet Redditch's development needs rely heavily on evidence that is not yet available. The ADR land at Weight's Lane (east of the railway) has been identified in the ELR as suitable to contribute towards meeting the Borough's employment land needs, however it is accepted that if solutions to the Bordesley Bypass can be employed to enable delivery of some housing in addition to the employment on this part of the site then this would be supported by the Borough Council in order to maximise the use of the land. Officers would expect full support from Worcestershire Highways Authority with respect to an alternative Bypass alignment north of the Weight's Lane site. The Council is working towards developing a locally derived, robust evidence base in light of the</p>	
R279	Latham			
R280	Ahmed			
R281	Nazir			
R282	Bashir			
R283	Bashir			
R284	Bashir			
R285	Akbar			
R286	Akhtar			
R287	Akhtar			
R288	Ashraf			
R289	Ashraf			
R290	Ashraf			
R291	Ashraf			
R292	Ashraf			
R293	Ashraf			
R294	Ashraf			
R295	Iqbal			
R296	Iqbal			
R297	Mahmood			
R298	Hussain			
R299	Qurban			
R300	Nisa			
R301	Bi			
R302	Jan			
R303	Shazia			
R304	Braich			
R326	Dolan			

Rep No.	Name	Summary	Officer Response	Officer Action
R327	Stevens		emerging Localism Bill however	
R328	Townsend		there are no reasons to currently	
R334	Laurent		dispute the RSS evidence base at	
R335	Payne		this point. There are therefore	
R359	Davis		substantial demands for	
R360	Turner		employment land in Redditch, and	
R361	Doble		only 33.3Ha of land available within	
R362	Ali		the Borough, including this site, to	
R363	Ali		contribute towards the requirements	
R364	Begum		for over 60Ha in total.	
R365	Akhtar			
R366	Akhtar	Not all previously identified sites for	Although all previously identified	None
R367	O'Reilly	development have been brought	PDL sites have not yet been brought	
R368	Zaman	forward and represent a large	forward for development, they do	
R369	Shah	volume of housing capacity. We	contribute towards meeting the	
R370	Naz	understand that CPRE has identified	housing target. Officers do not	
R371	Ullah	sufficient alternative development	consider that the CPRE rep	
R372	Ali	sites without it being necessary to	identifies sufficient alternative	
R373	Ahmed	use Brockhill GB. RBC is referred to	capacity	
R374	Bi	the CPRE rep for details of these		
R375	Begum	sites and housing figures		
R376	Azsiz			
R380	Jarrett	All other options have not been	Of the sites identified here, officers	None
R391	BAG	explored e.g. in fill around the town	also have to consider other	
R393	Lee	centre, former Alunna industrial sites	development uses in addition to	
R395	Payne	in Lodge Park, disused commercial	housing. Town centre sites must	
R397	Save Brockhill	sites (Fishing Line Road), low value	primarily be considered for uses to	
	Green Belt	commercial sites in the town centre	complement the Town Centre,	

Rep No.	Name	Summary	Officer Response	Officer Action
	Petition	<p>(discount warehouses and Buildbase) or Bordesley Park</p> <p>RBC should redesignate some employment land for housing. Figures from Worcs Chamber of Commerce show that at March 2011 there were approximately 1,063,625 sq ft of unoccupied industrial and warehouse space in Redditch. In addition there was 194,448 sq ft of unoccupied office space. RBC should investigate whether some of the land designated for office space would be better used for housing</p>	<p>employment sites need to be considered with respect to the employment target and Bordesley Park is not within the Borough boundary and therefore falls beyond the remit of this version of the CS. Officers have taken account of sites within the town centre and those surplus to employment requirements. Their suitability for residential development is recorded in the SHLAA</p> <p>As of 30/6/11 there was 838,095 sq ft (77,859 sq m) of industrial space available in the Borough. This represents a void rate of 8%. This void rate has been relatively consistent during the past 4 years. The longest an industrial unit that is currently available has been on our database is since 16/2/07</p> <p>As of 30/6/11 there was 194,543 sq ft (18,073 sq m) of office accommodation available in the Borough. This represents a void rate of 16%. This void rate has been</p>	<p>Consider implications of Employment Land Review and determine a locally derived employment land target for Redditch</p>

Rep No.	Name	Summary	Officer Response	Officer Action
			<p>relatively consistent during the past 4 years. The longest an office suite that is currently available has been on our database is since 10/1/03</p> <p>There are only 8 office properties that have been available for more than 5 years, no industrial properties have been available for more than 5 years</p> <p>A void rate of c10% is considered optimum for a healthy market and sufficient available properties to generate demand</p> <p>Existing employment areas are protected for employment uses and regeneration of some areas is encouraged for employment uses</p>	
R006	Bish	Limit new house building to bungalows and sheltered housing for the elderly as this is where the housing shortfall lies. Huge numbers of elderly people still live alone in 3-4 bed family homes	The SHMA will identify in which housing sectors there is a shortfall of appropriate housing. Policy wording will reflect that reference should be made to the most up to date SHMA with respect to the size and type of housing the Council would expect to see on development schemes	Policy wording will reflect that reference should be made to the most up to date SHMA with respect to the size and type of housing the Council would expect to see on development schemes

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Do not build family homes on school sites. There is no local school for children to attend leading to obesity issues due to the school-run by car</p> <p>Opposed to building on Woodrow's parkland [Dingleside?] Providing open space for children to run around on reduces anti-social behaviour on street corners</p> <p>Why is K Lumley claiming that 3000 houses in Redditch is a reduction from the original 7000 target when half of those were to be built in Bromsgrove district – it's the same amount?</p>	<p>The school sites that have been identified for housing development have been declared surplus by the local education authority and identified as suitable for alternative uses</p> <p>Application for this site was approved contrary to policy criteria</p> <p>Noted. Not sure when K Lumley said this. However, housing target will need to be based on a credible and robust evidence base. See officer response at R007</p>	<p>None</p> <p>None</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence</p>
R007 R008 R009 R015 R016 R018 R019 R020 R021	Cardew Rose Hughes Batty Rowell Coombs Morris Baker Carpenter	Disagree with Policy 8. The target is too high. Either build no new houses or only a limited number, no more than 1000 to reflect local need for Redditch residents only. These should be mainly affordable, close to the city centre, with good road/rail and supporting infrastructure and close to employment sites.	The housing target for Redditch must be based on a credible and robust evidence base. The pending demise of RSS targets, and the emerging Localism Bill, gives officers the opportunity to set a housing target for Redditch which will meet our needs, based on our own commissioned evidence, rather	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence

Rep No.	Name	Summary	Officer Response	Officer Action
R022	Clark		than planning to meet targets imposed regionally. RBC expects to draw on data in the Worcestershire Strategic Housing Market Assessment (due summer 2011), which will analyse housing needs across all tenures up to 2030. Once this evidence is in place, officers will progress with a housing target that meets Redditch's needs	
R023	Phillpotts			
R029	Ostroumoff			
R036	Bourne			
R037	Bourne			
R038	Smith			
R039	Allen			
R040	Emms			
R042	Best			
R043	Rixon			
R044	Allbutt			
R045	Smith	There are hundreds of empty properties in Redditch that should be brought back into occupation. These should be included in current and future housing targets. This more than offsets the amount of planned new build in the Green Belt. RBC should be more proactive in this respect	At 1 June 2011, there were 890 empty properties in the Borough, which is a reduction of 140 properties per annum when compared with the same period in 2007 before the economic downturn. Of the 890 empty properties, only 87 are in RBC ownership and this number represents the 'churn' in housing stock for re-lets etc. There are 43 second homes within the Borough and 44 which are registered as 'temporary absence' due to occupants in prison, care homes etc. There are 270 properties which have been empty for more than six months, which could be	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence
R046	Lippett			
R049	Haigh			
R050	Haigh			
R051	Haigh			
R052	Haigh			
R054	Mason			
R057	Sinclair			
R061	Homer			
R063	Evans			
R065	Porteous			
R068	Hill			
R074	Griffiths			
R076	Mason			
R082	Ramsay			
R100	Selves			
R101	Davies			

Rep No.	Name	Summary	Officer Response	Officer Action
R116	Smith		targeted by the Empty Homes Strategy. However, funding to enable the Empty Homes Strategy to return homes into use is extremely limited and the legal process associated with commandeering privately owned properties is a long and laborious process. All empty properties are accounted for in evidence such as the SHMA and they are viewed for statistical purposes as providing a useable residence, thus reducing the number of new dwellings that need to be provided	
R118	Bartley			
R123	Mills			
R308	Beecham			
R309	Moxon			
R310	Waldron			
R311	Hatton			
R312	Hatton			
R313	Middleton			
R318	Bonham			
R343	Smith			
R344	Newburn			
R345	Flowers			
R346	Sims			
R347	Cruyton			
R348	Miller			
R349	Rose			
R350	Cale			
R351	Warby			
R352	Warby			
R354	Khoury			
R355	Kloetzli			
R356	Anderson			
R357	Bradshaw			
R381	Edmunds			
R383	Sinclair			
R384	McQuaid			
R385	McQuaid			

Rep No.	Name	Summary	Officer Response	Officer Action
R386 R387	McQuaid McQuaid			
R010 R012 R019 R025 R028 R036 R037 R043 R068 R106 R107 R122 R173 R258 R320 R329 R333 R335 R337	Barber Lewis Morris Barber Lynn Bourne Bourne Rixon Hill Jobson Wardle Carter Coombes Harvey King Hancock Betts Payne Vranic	<p>Opposed to development on greenfield sites/ ADR/ Green Belt. No need for so many new houses. These dwellings could be better placed and limited to development on brownfield land</p> <p>Use land that requires enhancement and re-population i.e. - around the town centre (Smallwood Health Centre)</p> <p>- numerous vacant office and</p>	<p>See officer response at R007. Furthermore, based on evidence in the SHLAA, there are insufficient development sites available to meet the target of 3200 dwellings within the Borough without taking consideration of greenfield, ADR and Green Belt land into account</p> <p>With respect to sites suggested to accommodate housing development:</p> <p>Land round Smallwood Health Centre - The north west quadrant has been identified for redevelopment as part of the Town Centre Strategy and Core Strategy Policy 18. This site has been identified in the SHLAA as having some residential potential but capacity would be constrained by preference for other town centre uses</p> <p>See officer response on p.4</p>	<p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>None</p> <p>See officer action on p.4</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>commercial buildings should be converted into apartments</p> <p>- bring back empty homes into use</p> <p>- land adjacent to the railway</p>	<p>See officer response at R007</p> <p>See officer response at R012</p>	<p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence</p> <p>Officers will continue to progress and promote SPDs where appropriate. However there are no actions relating to CS progression at this stage</p>
R012 R043 R053 R113	Lewis Rixon Timothy Stallard	<p>Revamp older areas of the town and reuse unused office space as these areas are in abundance – such as Enfield</p>	<p>Revamping any areas of the town requires cooperation and financial commitment from landowners, which takes matters out of the hands of the planning system. An example of this is Edward Street. SPD was produced and adopted by the Council in 2007, however despite appropriate planning tools being in place to enable redevelopment, the site remains in a state of disrepair</p>	<p>Officers will continue to progress and promote SPDs where appropriate. However there are no actions relating to CS progression at this stage</p>

Rep No.	Name	Summary	Officer Response	Officer Action
			<p>With respect to redevelopment of areas such as Enfield, Enfield caters for a part of the economic market, where there is a need for low value rental units for businesses. Furthermore, Enfield has a high occupancy rate therefore there is no real need to redevelop it</p>	
R071 R075 R081 R329	Ansell Battle Garner Hancock	All brownfield sites should be looked at before building on Green Belt	<p>All brownfield sites which are considered suitable and available for housing development have been identified in the SHLAA. Furthermore, the SHLAA has had consideration for urban greenfield sites and ADRs. At this point in time, there is insufficient land available to meet the housing target without the inclusion of Green Belt land</p>	Continue to refresh the SHLAA in order to identify suitable land for housing
R071 R100 R117 R320 R330 R394	Ansell Selves Cotton King Dawson McFarlane	Why build more houses when there are so many still for sale?	Officers consider that the economic climate is to some extent responsible for the slow-down in house sales. The economic downturn and the current state of the mortgage market does not	Continue to develop a housing target for Redditch based on a credible evidence base

Rep No.	Name	Summary	Officer Response	Officer Action
			remove the need for additional homes, but it does slow down the process	
R077	Rogers	People have to accept that houses are going to be built within the Borough, be it on Green Belt land or not. But one must question the number and location, especially in the Brockhill East and West areas	Support for housing target noted. See officer response at R002	See officer action at R002
R080 R117 R169 R390	White Cotton Showell Blakeway	Object to all new house building - Statistics show Redditch has an out migration of population	The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live (PPS 3 and emerging NPPF). Not meeting Redditch's housing needs is not an option Redditch had an average out migration of 407 per annum (04-09), however, the natural change (due to births and deaths) averages 451 per annum (04-09). Therefore Redditch has an annual increase in its population per annum despite a high out migration rate	None Officers will take account of the migration figures when determining an appropriate housing target for the CS

Rep No.	Name	Summary	Officer Response	Officer Action
		- Should promote strong family bonds rather than building more homes for single parents and dividing families	This is not a planning issue	None
R097	Merry	<p>Insufficient attention has been paid to identifying brownfield sites in the Borough. Most of which require re-development thereby helping to eliminate eyesores. Such development would relieve some of the excessive pressure on Green Belt land</p> <p>Where does the proposed need come from considering the population is set to remain fairly constant?</p> <p>The Localism Bill should enable local authorities and residents some say in such development rather than</p>	<p>All brownfield sites which are considered suitable and available for housing development have been identified in the SHLAA. Furthermore, the SHLAA has had consideration for urban greenfield sites and ADRs. At this point in time, there is insufficient land available to meet the housing target without the inclusion of Green Belt land</p> <p>Despite the Redditch population being set to remain fairly constant, proposed need arises from household composition. Household sizes are set to shrink (2.47 in 2001 to 2.18 by 2031). Also, single person households are set to increase due to marriage breakdowns and an increased aging population</p> <p>The Localism Bill will require locally derived targets to be based on robust and credible evidence. In the</p>	<p>Continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence</p> <p>Progress a housing target to meet Redditch's needs based on the imminent</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		allowing developers to build as and where they please as is currently the situation	absence of adopted CS or emerging targets based on credible evidence, there will be a presumption in favour of sustainable development – emerging National Planning Policy Framework	SHMA evidence
R106	Jobson	<p>Should only consider building on greenfield sites when all other options have been exhausted. At some point we will be in a position where Redditch is full – a concrete jungle with a fenced in park. Greenfield development is an easy option leaving poor housing and derelict brownfield sites in place, All brownfield sites should be used before consideration of greenfield sites</p> <p>Farmland should be protected</p>	<p>All brownfield sites which are considered suitable and available for housing development have been identified in the SHLAA. Furthermore, the SHLAA has had consideration for urban greenfield sites and ADRs. At this point in time, there is insufficient land available to meet the housing target without the inclusion of Green Belt land</p> <p>It is not always possible to protect farmland from development. In fact the majority of the New Town development took place on former farmland. However, every effort is made to protect the highest quality agricultural land in accordance with MAFF guidelines</p>	<p>Continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>Use MAFF land quality mapping to inform the policy's accompanying Technical Paper</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Planning must be gradual as statistics and needs change and cannot be predicted in the current economic times. At this time develop only brownfield sites as they are most likely to provide the low cost housing that is most in need</p> <p>Areas of previous development [Brockhill] should be excluded to maintain the correct ratio of open space to buildings</p>	<p>Housing delivery is monitored annually and the SHMA is also refreshed annually. If the SHMA indicates that Redditch's needs are changing, these will be reflected through the Development Management process. There is no indication that brownfield sites are the most likely to provide the low cost housing that is needed. Redditch cannot demonstrate a 5 year supply of housing land (PPS3 and NPPF) without reliance on greenfield sites. Within the 5 year supply, 68% of the identified sites are brownfield sites and of these sites, 60% of them have valid planning consent or are under construction</p> <p>Redditch has a high standard of open space provision which is negotiated within each development site. Any new development would be expected to meet the open space standard as part of its design. Open space negotiated previously in</p>	<p>Continue to monitor housing demand and delivery throughout the Plan period. No action for Plan preparation</p> <p>Ensure open space provision is negotiated as part of any proposed development scheme</p>

Rep No.	Name	Summary	Officer Response	Officer Action
			development schemes would not be double counted if new development is located in the vicinity of existing development	
R129(A) R129(B)	Persimmon Homes Persimmon Homes/ Miller Homes/ S&RD	<p>Until the Localism Bill is enacted, the WMRSS remains part of the development plan and the emerging WMRSS2 and its Panel Report, must attract significant weight in CS preparation</p> <p>Supports the approach of reference to construction and completion of dwellings within a defined period as this approach is concerned with delivery of new homes. However, an appropriate Plan end date should be reflected in the policy</p> <p>Consider paragraph two of the policy to be unnecessary. One paragraph relating to the entire Plan period would be sufficient. Residual</p>	<p>The Council is working towards developing a locally derived evidence base in light of the emerging Localism Bill. The Core Strategy will not be progressed to publication/ submission until the issue around the Localism Bill and the RSS revocation has been resolved</p> <p>Support noted. Officers are aware that the plan period needs to reflect an appropriate end date in accordance with PPS3 para 53 and the end date and any associated targets will be amended accordingly in policy</p> <p>Noted and agreed. Once locally derived evidence is in place to support a housing target for the Borough, policy wording will be</p>	<p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence</p> <p>Reconsider appropriate end date for the Plan period</p> <p>Reword policy to reflect a locally derived housing target</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>requirement can be explained in the RJ</p> <p>Concerned that the proposal for 3200 dwellings up to 2026 is lower than the 4000 dwellings recommended by the WMRSS2 Panel Report for within Redditch and significantly lower than the 7000 dwellings proposed overall for Redditch related growth in the WMRSS2 Panel Report</p> <p>Accepts developer compliance with the Lifetime Homes Standard, but objects to paragraph 4 of the policy which seeks to encourage implementation of the concept prior to its mandatory introduction in 2013 as this would have significant implications for marketing and designing the layout of schemes. Implementation of relevant standards prior to the currently programmed timetable is unjustified. There is no explanation of the</p>	<p>amended accordingly</p> <p>The 3200 dwelling target represented an achievable figure for consultation purposes in the aftermath of the RSS revocation issue. The Council is working towards developing a locally derived evidence base in light of the emerging Localism Bill</p> <p>The policy merely 'seeks to encourage' early implementation of the Lifetime Homes Standard prior to its 2013 mandatory introduction. The RJ makes this position clear. Also, it is unlikely that the CS will be adopted prior to this date in 2013</p>	<p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>implications if applicants do not comply with the Code for Sustainable Homes during this 'voluntary' period prior to 2013. It is not considered that non-compliance could be sustained as a refusal reason. This part of the policy should be excluded</p>		
R180	Anderson	<p>There is a need for a new Housing Needs Assessment, which takes account of the aging population of Redditch, their current property sizes and their actual need. Furthermore, it should take account of the possibility of multi-generation family homes to support increasing needs for the elderly in the home, the supply of care homes and private rented housing</p> <p>Some housing in the town is reaching the end of its useful life. What are the implications on housing need if these dwellings are taken down and recycled?</p>	<p>New SHMA is currently being prepared for all Worcestershire Districts and will include an in depth District Profile for each district. This will include the needs of an aging population and other projected changes to household composition. Furthermore, for the first time, the private rented sector will be included in the analysis</p> <p>When housing is demolished and replaced, only the net gain on a site is counted towards off-setting the housing target (a one for one replacement would make no impact on the target). The Council is limited</p>	<p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence</p> <p>Officers will continue to progress and promote SPDs where appropriate. However there are no actions relating to CS progression at this stage</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		The concept of lifetime homes has unacceptable effects on the provision of affordable housing. Basic structures should be provided, which are more affordable and families should 'add on' home improvements and attractive features as the family becomes more affluent	financially with respect to compulsory purchase in order to redevelop the areas identified. Officers can guide the private development market through the provision of SPD but essentially any redevelopment would be market-led See officer response at R006	Policy wording will reflect that reference should be made to the most up to date SHMA with respect to the size and type of housing the Council would expect to see on development schemes
R202 R394	White McFarlane	Only social housing should be built	See officer response R006	See officer action R006
R329	Hancock	It has been our experience that any new developments provided only housing to attract the buyer who would be considered to be enjoying a middle class lifestyle	See officer response R006	See officer action R006
R353	Williamson	Policy makes no provision for homes for the elderly	See officer response R006	See officer action R006
R378	WCC	Questions relevance of para 2. A clearer explanation of the overall	Noted. Policy will be reworded when a robust housing target has been	Reword policy when new housing target is

Rep No.	Name	Summary	Officer Response	Officer Action
		Plan provision would be useful	determined	determined
R397	Save Brockhill Green Belt Petition	The SHLAA states that the assessment should involve key stakeholders, including local communities. The SHLAA Working Partnership includes developer interest but no community representation. This is unsatisfactory and there should be another review, this time involving the local community	<p>It was very difficult to establish a working partnership despite invitation to contribute to the SHLAA in February 2008 (documented in 2009 SHLAA). When a Partnership was eventually set up, the purpose was to scrutinise and agree the assessment methodology and to develop a mechanism to collect detailed landowner information relating to viability assumptions, ownership/ tenancy constraints etc. No sites were discussed in detail as part of the Partnership – it was purely involved with the process</p> <p>The SHLAA was originally placed on public consultation in March 2009 and consultation responses were reported to Council. There is a copy of the consultation responses on the web site. The consultation event was publicised in Redditch Matters. A large volume of responses were received in 2009 based on sites included in that version, however, as Brockhill Green Belt wasn't included,</p>	None

Rep No.	Name	Summary	Officer Response	Officer Action
			<p>no responses would have been expected from residents in these areas</p> <p>The SHLAA was endorsed by the Council for an annual update which did not need further Council ratification and the SHLAA updates are displayed on the website. However, all background documents relating to the Core Strategy are open to comment, especially so during our consultation periods. When sites are located all across the town, other than through public consultation, there is no viable suitable alternative method for including local communities in the SHLAA process</p>	
TARGETS				
R018	Coombs	Limit the building or there will be no individual areas such as Astwood Bank, Webheath and Feckenham left	The Council is working towards developing a locally derived, robust evidence base in light of the emerging Localism Bill. A housing target for Redditch will be based on emerging SHMA evidence, which is considered an appropriate and robust approach to adopt.	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence

Rep No.	Name	Summary	Officer Response	Officer Action
			Astwood Bank and Feckenham are defined in Policy 6 – Settlement Hierarchy as suitable to meet local needs only (NPPF para 112)	None
R024 R380	Theobald Jarrett	Why set a target? Or set a maximum of 2200 should they be required 2200 dwellings should come forward naturally. The Council should not waste time trying to find sites – history shows that they come forward naturally and will easily fulfil a further 2200 dwellings over 15 years	See officer response at R018	See officer action at R018
R034 R035 R096 R172	Sharpe Evans Griffin Heaselgrave	Housing provision should be a maximum of 1000 dwellings 1000 dwellings could be provided just using infill strategies on brownfield sites and empty buildings. There is a surfeit of unused commercial plots, scruffy, old, derelict sites – use these first	See officer response at R018 See officer response at R002	See officer action at R018 See officer action at R002
R041	Patten	Limit new homes to 200 and build them on waste ground around the town centre. Convert derelict buildings	See officer response at R018 and R002	See officer action at R018 and R002

Rep No.	Name	Summary	Officer Response	Officer Action
R048	William Davis Ltd	<p>Until the issue of cross boundary growth has been clarified, it is premature to consider Redditch-only housing numbers. Robust evidence should be in place to support any housing target</p> <p>Object to the Council's intention to encourage private sector development to implement lifetime homes prior to its mandatory introduction in 2013 as it is inconsistent with the previous government's 2013 target. Also query whether the coalition government will now even commit to 2013. The recently revised 'CHS Technical Guide (Nov 2010) indicates that Lifetime Homes requirements are not a mandatory element of the code until level 6 of the code is required</p>	<p>Once locally derived evidence is in place to support a housing target for the Borough, the matter of cross boundary development will be dealt with if the target suggests that Redditch cannot accommodate its evidenced target within the Borough boundary</p> <p>See officer response at R129(A)</p>	<p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence. Consider whether cross boundary growth is an issue once evidence is in place</p> <p>None</p>
R055	Wakeman	Object to housing target. Target is probably unquantifiable and no more than educated guesswork	See officer response at R018	See officer action at R018
R059	Watkiss	Figure seems high but housing	See officer response at R018	See officer action at R018

Rep No.	Name	Summary	Officer Response	Officer Action
		target needs to be evidenced		
R069 R070	Sutton Sutton	RSS and its targets have been abandoned therefore cannot see any reason to expand Redditch. Redditch has not achieved past growth targets so why should it do so now?	See officer response at R018	See officer action at R018
R084	Cunningham	Instead of guessing a figure for new housing, it would be preferable initially to ensure all existing dwellings are occupied	See officer response at R007	See officer action at R007
R091 R108 R258 R314 R328 R353	Tetlow King Hawkins Harvey Rood Townsend Williamson	Target needs to be evidenced	See officer response at R018	See officer action at R018
R092	Gallagher Estates Ltd	Consider that 4000 dwellings should be built in Redditch between 2006-26 as stipulated in the WMRSS Ph2 Revision EiP Panel Report	The Council is working towards developing a locally derived evidence base in light of the emerging Localism Bill. The Core Strategy will not be progressed to publication/ submission until the issue around the Localism Bill and	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Furthermore this policy pays no regard to the 3000 dwellings within Bromsgrove as identified within the RSS EIP Panel Report</p> <p>The target of 3200 appears to reflect the uncertainty surrounding delivery on the A435 and Webheath ADRs and reflects their removal from the 4000 dwelling target. Alternative, immediately available and deliverable sites should be considered to accommodate the shortfall</p> <p>Land to the east of the railway at Brockhill East can deliver up to circa 260 dwellings which is not currently considered within the SHLAA capacity for this strategic site</p> <p>There is no specific mention of allocating land for at least 15 years from adoption. The RPDCS is unlikely to be adopted before 2013</p>	<p>the RSS revocation has been resolved</p> <p>See officer response at R048</p> <p>See officer response at R007</p> <p>See officer response on p.3</p> <p>See officer response at R129(A)</p>	<p>See officer action at R048</p> <p>See officer action at R007</p> <p>None</p> <p>See officer action at R129(A)</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		and the LPA should therefore be planning to deliver housing to 2028. Failure to address this PPS3 requirement undermines the soundness of the Core Strategy		
R093	Bruton Knowles	Consider that the proposed target of 3200 is well below the understood housing requirement for the plan period and future sites should be identified to accommodate additional growth	See officer response at R018	See officer action at R018
R094	CPRE	Figure of 3200 has been achieved by projectors including Green Belt sites which is not a base for the Borough's housing need. There must be a target in the CS if only to prevent developers removing land at will Consider that the CS cannot be without housing need figures The list of available undeveloped probable housing sites listed needs updating	See officer response at R018 The SHMA will identify housing need within the Borough and reference to the most up to date SHMA will be reflected in policy List of development sites is updated annually through housing monitoring. The list in the CS	See officer action at R018 Reference policy to SHMA to reflect the housing need in Redditch Update list of development sites for next publication based on

Rep No.	Name	Summary	Officer Response	Officer Action
			represents a snapshot at the time of publication	most up to date monitoring figures
R095	HCA	Note that the level of planned housing delivery in the CS has been reduced from the RSS target given the nature and assessment of sites identified as ADR	The housing target needs to be revisited in light of the emerging Localism Bill, and emerging/ imminent evidence to determine the suitability of Webheath ADR and A435 ADR for development, officers will reconsider the need to allocate ADR and Green Belt land to meet development targets	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing
R100	Selves	Housing target needs to be robustly evidenced. Concern that the strain 3200 additional houses will have on community facilities in Redditch	See officer response at R018 Additional development would include a need for associated infrastructure, including open space, education provision, doctors' surgeries etc. Officers are developing an infrastructure policy to guide and support the provision of such community facilities when development increases the reliance on existing facilities	See officer action at R018 Refer to new infrastructure policy and Infrastructure Delivery Plan
R103	Smith	Housing targets should be based on population projections, the number on the waiting list and availability of	See officer response at R018	See officer action at R018

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>mortgages not on figures 'plucked out of the air'</p> <p>Housing stock should be monitored to ensure empty homes are brought back into use</p> <p>Deal with under occupancy of larger family homes before building more houses</p>	<p>See officer response at R007</p> <p>RSL/ LA properties can contribute towards addressing this issue and re-house tenants into appropriate properties; however, this is not a planning issue. Occupancy rates in private dwellings is also not a matter that can be dealt with through the planning system</p>	<p>See officer action at R007</p> <p>None</p>
R104	Green	Consider an additional 10% could be achieved in addition to 3200	See officer response at R018	See officer action at R018
R109	Smith	<p>Target too high. We should only build enough to meet the needs of current residents</p> <p>Infrastructure in danger of overload</p>	<p>See officer response at R018</p> <p>See officer response at R100</p>	<p>See officer action at R018</p> <p>See officer action at R100</p>
R113	Stallard	Town planned for 90,000 – western area roads need modification	Whatever the location of planned development, associated infrastructure improvements or additional provision would be expected to form part of any	Develop infrastructure policy and delivery plan

Rep No.	Name	Summary	Officer Response	Officer Action
			development proposal and would need to be mindful of the new infrastructure policy which will form part of the next revision of the Core Strategy	
R115	Hayfield	850 maximum	See officer response at R018	See officer action at R018
R120 R121	Styler Styler	1500 – focus should be on brownfield sites and stop any further development on greenfield sites	See officer response at R018 and R002	See officer action at R018 and R002
R122	Carter	Agree with target but consider that better use should be made of brownfield land for development and no encroachment into Green Belt	See officer response at R002	See officer action at R002
R124 R177 R178	Hughes Styler Styler	Objects to target	See officer response at R018	See officer action at R018
R125	Barton Willmore	<p>Objects to lower housing target of 3200 dwellings. This target is not adequately justified. RSS target of 7000 is based on a justified and effective evidence base</p> <p>In the absence of any assessment of housing need, BW has commissioned its own HNA (submitted with this rep) which indicates that the Redditch population is set to increase by 4100</p>	<p>See officer response at R129(A)</p> <p>A Worcestershire-wide SHMA has been commissioned and the locally derived housing target for Redditch will be based on this evidence</p>	<p>See officer action at R129(A)</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>and households by 4300. The BW HNA also seeks to assess the RPDCS housing target and its implications for need. It also runs further scenarios based on zero net migration demonstrating a housing need in Redditch of 4,309 dwellings between 2011-2026</p> <p>Redditch should encourage net-in migration to improve the labour supply and mix of skills available</p> <p>ADRs are a historic designation and preference should always be to allocate sites where possible in accordance with PPS. Webheath ADR is capable of delivering up to 275 dwellings, a local centre, open space and green infrastructure</p>	<p>Redditch Borough Council would prefer it if residents were to acquire the skills required by local businesses and were therefore able to access employment opportunities within the town rather than these jobs being taken up by non-residents</p> <p>See officer response at R095</p>	<p>None</p> <p>See officer action at R095</p>
R127	Highways Agency	Notes that RBC recognises the Localism Agenda and the move towards locally set targets reflecting	See officer response at R018	See officer action at R018

Rep No.	Name	Summary	Officer Response	Officer Action
		'what local people want'. Notes that in taking this direction, the target is lower than that of the RSS and following evidence gathering , this target may alter again		
R169	Showell	High housing target reflects the inward migration into Redditch	ONS mid year estimates 2004-2009 indicate an annual average net migration (and other changes) from Redditch of -407 persons. However, Redditch's natural change to population (births and deaths) indicates an annual average increase in population of +451. Off-setting these two figures against each other indicate an annual average population increase of 45 persons. Statistics such as these are taken into account by the SHMA research to determine a locally derived target for Redditch	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence
R174	Bedford-Smith	Agrees with target, which should be added to by measures freeing up available stock (mainly in the affordable sector) through re-lets, co-habitation, change of tenure, migration, deaths and those taken into care.	See officer response at R018	See officer action at R018
R176	Styler	Objects to housing target as the	See officer response at R018 and	See officer action at R018

Rep No.	Name	Summary	Officer Response	Officer Action
		population is set to fall	R169	and R169
R183	Comelio	<p>Can the 2006 population projections still be relied upon as sound planning evidence</p> <p>Understands that RSS derived targets on Green Belt land were unavoidable but considers that under the Localism Bill, the public can vote against this decision</p> <p>Objects to being consulted on a Strategy that is based on the 'old rules'</p>	<p>See officer response at R018</p> <p>This is not what the government has planned in the Localism Bill. There are many amendments being made to the Bill at the moment so a position will become clearer as the Bill progresses through the governance process. At present, the public cannot vote against a proposed Core Strategy, they can however vote on Neighbourhood Development Plans, which can promote development in excess of that proposed in the Core Strategy but not on a figure lower than that in the Core Strategy</p> <p>The planning process changes periodically. Plan preparation cannot simply stop and start from the beginning because the rules/ process is changed. As new guidance emerges, plans already in production go through a set of</p>	<p>See officer action at R018</p> <p>Officers to keep up to speed on Localism Bill and its implications as it emerges</p> <p>Continue to progress a Core Strategy which will be found sound at Inquiry – this will include soundness with procedural matters</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		Further explanation of the evidence base for the number of new houses is required	transitional arrangements in order that they comply with new legislation but make best use of the work undertaken to date The SHMA will provide this explanation	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence
R197 R198	Hirst Marks	Further development not justified. There is no demand for 6000-7000 new homes. Existing premises lie empty. There are numerous buildings which may be demolished/ converted to enable such building programmes Indications are that there is a limited need for further affordable housing which could easily be accommodated on available land within the town centre	See officer response at R018 and R010 Affordable housing needs will be identified in the SHMA and affordable housing targets will be determined in line with this evidence. Government has a priority to integrate affordable homes within new development sites to encourage and promote social inclusion. Therefore, a portion of affordable units would be negotiated on all new developments which meet the	See officer action at R018 and R010 Revisit Policy 10 – Affordable Housing on receipt of SHMA evidence

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>There has been no consideration of sensible and strategic development in the Green Belt to the south of the urban area. A north/south divide has been created resulting in considerable congestion in the north area of Redditch and no development to the south. Using up the remaining Green Belt to the north will remove/limit access to rural areas and amenities offered and prejudice the position of local residents. The original RSS report considered the preferred option to extend Redditch to the south around Astwood Bank and Studley. This is sensible as it would allow access to the south for work areas to the south as well as to the north. This area is close to the A441 and A435 and well placed to develop towards Stratford. It would require less infrastructure development and the countryside is less rolling. Development would be more easily integrated</p>	<p>affordable housing policy criteria</p> <p>RBC does not consider the south west of the Borough to be a suitable direction for growth. The evidence to support this view is contained in the Study of Green Belt Land and ADRs within Redditch Borough and in RBC analysis of WYG1. The RSS did not consider land around Astwood Bank, and the Panel dismissed land at Studley. Joint RBC/BDC emerging evidence will address these areas for suitability for development opportunities</p>	<p>None</p>
R316	Heyford Developments Ltd	<p>The target is inappropriate as it does not take account of or reflect the need in the 2006 population</p>	<p>See officer response at R018</p>	<p>See officer action at R018</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>projections. A target of 5,887 dwellings up to 2026 would be required based on the 2006 projections. The Council's figure in policy 8 should be considered as a 'minima'</p> <p>The plan period and subsequent policy should be extended to reflect a time horizon of at least 15 years from adoption in accordance with PPS3, para 53</p>	See officer response at R129(A)	See officer action at R129(A)
R339 R340 R341 R342	Parsons Parsons Parsons Parsons	<p>Targets should not be set before review and analysis of census 2011 data. This information could say for sure what the housing needs of Redditch people would be up to 2016. Census data would negate the need for further assumptions and guestimates in terms of housing need</p> <p>Need to adopt the same 'enough is enough' approach as Birmingham when Redditch was designated as a New Town</p>	<p>See officer response at R018</p> <p>The SHMA uses detailed up to date datasets, which robustly inform the SHMA outcomes. It is not practical or possible to stop plan production to wait for Census statistics, which will not be available until late 2012</p> <p>See officer response at R018</p>	<p>See officer action at R018</p> <p>See officer action at R018</p> <p>See officer action at R018</p>
R361 R389	Doble Sterry	Housing targets should be derived locally - Consider development in the	See officer response at R018	See officer action at R018

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Winyates triangle and Beoley Park, then consider use of ADRs sequentially [in preference to GB land]</p> <p>Who is to say whether the number is correct? Who has set these targets – local or national government? Why do we need so many houses? Hard facts and figures are needed</p>	<p>The housing target needs to be revisited in light of the emerging Localism Bill, and emerging/ imminent evidence to determine the suitability of Webheath ADR and A435 ADR for development, officers will reconsider the need to allocate Green Belt land to meet development targets. Winyates triangle and Bordesley Park are not within the Redditch Borough. Once locally derived evidence is in place to support a housing target for the Borough, the matter of cross boundary development will be dealt with if the target suggests that Redditch cannot accommodate its evidenced target within the Borough boundary</p> <p>See officer response at R018</p>	<p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing. Consider to what extent cross boundary growth is an issue once evidence is in place</p> <p>See officer action at R018</p>
R391	BAG	Housing target should be based on what number of new houses Redditch can accommodate without	See officer response at R018	See officer action at R018

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>compromising existing areas of high value</p> <p>There are a number a significant number of empty properties in Redditch</p> <p>The town has recently witnessed a net out migration</p>	<p>See officer response at R007</p> <p>ONS mid year estimates 2004-2009 indicate an annual average net migration (and other changes) from Redditch of -407 persons. However, Redditch's natural change to population (births and deaths) indicates an annual average increase in population of +451. Off-setting these two figures against each other indicate an annual average population increase of 45 persons. Statistics such as these are taken into account by the SHMA research to determine a locally derived target for Redditch</p>	<p>See officer action at R007</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence</p>
POLICY SUPPORT				
R030	WCC	Noted	Noted	None
R064	Paxton	Support for housing target as it is appropriate to the needs of the community and the sustainability of	Support noted. However see officer response at R018	See officer action at R018

Rep No.	Name	Summary	Officer Response	Officer Action
		the environment		
R091	Tetlow King	Support the policy Concerned by the proposal that all new development should meet Lifetime Homes Standards. RBC should consider this as a lower target, to be negotiated on an individual proposal basis and subject to viability	Support noted. However see officer response at R018 See officer response at R129(A)	See officer action at R018 See officer action at R129(A)
R105 R162	Dewhurst Campbell	Supports the target	Support noted. However see officer response at R018	See officer action at R018
R339 R340 R341 R342	Parsons Parsons Parsons Parsons	Support for Lifetime Homes Standard	Support noted	None
R379	Turley Associates (Scottish Widows Investment Partnership)	Supports maximum provision of dwellings within the Borough. They should be located in the most sustainable locations, readily accessible to the existing centres and capable of supporting further commercial investment in the town	Support noted. However see officer response at R018	See officer action at R018

Policy 9 Effective Use of Land

Rep No.	Name	Summary	Officer Response	Officer Action			
R007	Cardew	Housing densities should be higher in respect to flats in or near the city centre	Policy reflects the opportunity to achieve higher densities within or adjacent to Redditch Town Centre. Naturally, flats do provide higher density development, however, flatted development may not reflect the most appropriate development to meet Redditch's needs and is not always suited to the character of an area. The policy is flexible to ensure that all types of residential development can be provided in a Town Centre location at an appropriate density	None			
R008	Rose						
R009	Hughes						
R015	Batty						
R016	Rowell						
R018	Coombs						
R019	Morris						
R020	Baker						
R021	Carpenter						
R022	Clark						
R023	Phillpotts						
R029	Ostroumoff						
R036	Bourne						
R037	Bourne						
R038	Smith						
R039	Allen				Support for criteria iii & iv of the Policy	Support noted	None
R040	Emms						
R042	Best	Consider that the 15% target on PDL should be increased to 25%	PDL is a finite resource. Redditch has very limited redevelopment opportunities due to the relatively 'young' nature of the town's development. However, the opportunities for development on PDL means that less greenfield	Revise policy to remove reference to PDL target			
R044	Allbutt						
R045	Smith						
R046	Lippett						
R049	Haigh						
R050	Haigh						
R051	Haigh						
R052	Haigh						
R054	Mason						

Rep No.	Name	Summary	Officer Response	Officer Action
R057	Sinclair		land is required to meet the Borough's housing target.	
R061	Homer			
R063	Evans		Therefore the Council still needs to promote this resource to meet development needs	
R065	Porteous			
R074	Griffiths			
R076	Mason			
R082	Ramsay		The BORLP3 was subject to a Structure Plan requirement (Policy D.5) to provide 25% of its housing provision on PDL. In reality, 51.3% of development was provided on PDL during this period. The 2011 SHLAA update indicates that the supply of PDL is dwindling and it is not possible to identify sufficient sites on PDL to continue the previous level of PDL development	
R101	Davies			
R116	Smith			
R118	Bartley			
R123	Mills			
R309	Moxon			
R310	Waldron			
R311	Hatton			
R312	Hatton			
R318	Bonham			
R343	Smith			
R344	Newburn			
R345	Flowers			
R346	Sims			
R347	Croxton			
R348	Miller			
R349	Rose			
R350	Cale			
R351	Warby			
R352	Warby			
R354	Khoury			
R355	Kloetzli			

Rep No.	Name	Summary	Officer Response	Officer Action
R356 R357 R381 R383 R384 R385 R386 R387	Anderson Bradshaw Edmunds Sinclair McQuaid McQuaid McQuaid McQuaid			
R010 R104	Barber Green	High density housing should be considered but must be local to the town centre	This is fully addressed in criteria (ii) of the Policy	None
R012	Lewis	No higher densities as this leads to large over populated 'council' estates of stereo-typical house builds such as the proposed Brockhill East	Consider that this comment supports the RPDCS Policy. The density range of between 30 to 50 dph and 70 dph in town centre locations, offers a range in which developments in the Borough can responsively reflect the character of the surrounding area Developments in locations such as that proposed at Brockhill East would be expected to comply with density standards within current policy	None None
R014	Sport	Higher densities would see a reduction in garden sizes. Garden	See Officer Response at R012	None

Rep No.	Name	Summary	Officer Response	Officer Action
	England	areas provide opportunities for healthy recreation pursuits	Furthermore, contribution to publically accessible open space forms part of the DM negotiation process which contributes to the provision of opportunities for healthy recreation pursuits	
R024 R351 R352	Theobald Warby Warby	Development densities should reflect the existing environment. They should be higher in central locations and lower in semi-rural areas	See Officer Response at R012	None
R025	Barber	Objects to higher densities – especially within Redditch’s urban area Astwood Bank and Feckenham are better placed to expand rather than cramming within the urban area. The need for access to open space is greater within Redditch’s urban area	See Officer Response at R012 Refer to Policy 6 – Settlement Hierarchy – RBC does not consider the south west of the Borough to be a suitable direction for growth. The evidence to support this view is contained in the Study of Green Belt Land and ADRs within Redditch Borough and through RBC analysis of the WYG1 study areas	None None
R028	Lynn	Supports higher density	Support noted. However, refer to	None

Rep No.	Name	Summary	Officer Response	Officer Action
R043 R053 R084 R096 R105 R106 R113 R119 R173	Rixon Timothy Cunningham Griffin Dewhurst Jobson Stallard Danks Coombes	development	Officer Response at R012	
R030	WCC	Sustainable urban extensions should be designed to provide sufficient densities of population to support financially viable passenger transport operation. Low density development is therefore unsuitable. The minimum density for a financially viable fixed link (e.g. tram or rail system) passenger transport system is 60 dph, with high frequency, commercially viable bus-based systems requiring 40-50 dph	See Officer Response at R012 The CS does not make provision for Sustainable Urban Extensions. However, the Strategic Sites within the Borough and their specific policies included in the CS address the need for sustainable transport provision. Furthermore, density of such developments should be provided in accordance with relevant CS policy. Reference should also be made to CS Policy 4 – Sustainable Travel and Accessibility which aims to encourage more sustainable modes of transport throughout the	None None

Rep No.	Name	Summary	Officer Response	Officer Action
			Borough	
R034 R035	Sharpe Evans	Supports higher density to retain the identity of the town as a green and eco-friendly environment	Support noted. However, refer to Officer Response at R012	None
R041 R055 R080 R124 R338	Patten Wakeman White Hughes Stevens	Objects to higher density development	Objection noted. However, refer to Officer Response at R012	None
R059	Watkiss	Objects to higher density development. Redditch needs more family homes which is better provided at lower densities	See Officer Response at R012 and R014	None
R067	Worcs Wildlife Trust	Higher density development is not always the most appropriate approach. It may be appropriate in town centre locations subject to the need for sufficient open space for flood attenuation and POS In large urban extensions, higher density is not appropriate. Open space should represent 40% of the site area in order to provide for a range of needs including	See Officer Response at R012 and R014 Higher density development would still meet the Borough's required open space standards	None None

Rep No.	Name	Summary	Officer Response	Officer Action
		biodiversity enhancement, flood defence, POS and formal landscaping		
R091 R378	Tetlow King WCC	Support for Policy	Support noted	None
R092	Gallagher Estates Ltd	A flexible approach to housing densities should be applied, taking account of site characteristics/ constraints and the local environment and market. Consider that the upper density requirements of 50 dph would not be reflective of Redditch in both environment and market. Owing to the physical characteristics/ constraints of sites in certain instances such densities are not likely to be achievable. The policy should stipulate that these factors will be taken into account and a flexible approach to achieving high density will be applied	See Officer Response at R012	None
R103 R202	Smith White	Objects to higher density housing – when people live too close to each other, neighbour noise levels rise and causes tension and	See Officer Response at R012 Neighbour noise is not considered to be a result of density levels, rather society's lack of respect for	None

Rep No.	Name	Summary	Officer Response	Officer Action
		stress	its neighbour	
R108	Hawkins	Objects to higher density development as it leads to more anti-social behaviour. A mix of high and low is required	See Officer Response at R103	None
R109	Smith	Supports higher density housing - higher density (flats) are more affordable to buy or rent - uses less green space, which should be preserved	Higher density housing is appropriate in Town Centre locations. However, the appropriateness of flatted developments may not be suitable given the current housing market and requirements. The appropriateness of flatted (or other) developments will be realised through the SHMA, which will identify the appropriate type and mix of housing needed within Redditch.	Reference Policy to SHMA
R115	Hayfield	Objects to higher densities - reduce number of houses and use brownfield sites	See Officer Response at R012 See Officer Response at R007 re: PDL	None

Rep No.	Name	Summary	Officer Response	Officer Action
R120 R121 R172 R329	Styler Styler Heaselgrave Hancock	Supports higher density development in order to save development on greenfield land	See Officer Response at R109	See Officer Action at R109
R122	Carter	Supports higher density development as long as it is high quality and low rise	See Officer Response at R109	See Officer Action at R109
R129(A) R129(B)	Persimmon Homes Persimmon Homes/ Miller Homes/ S&RD	Policy considered reasonable and appropriate	Support noted	None
R169	Showell	Supports higher density as there are lots of large and small pockets of land available	See Officer Response at R109	See Officer Action at R109
R174	Bedford-Smith	Yes – No is simplistic when locations influence solutions. Generally support low rise and about 14 dpa underlying however the benefit and cost savings of controlled aspect should be considered. Again it is regretted that higher quality of housing with human scale and identity in form	See Officer Response at R109	See Officer Action at R109

Rep No.	Name	Summary	Officer Response	Officer Action
		of urban village		
R176 R177 R178	Styler Styler Styler	No – we don't need anymore housing	We need additional housing to meet our local population needs. The level of which will be identified in the SHMA. Suitable locations for the identified need is identified in the SHLAA and the level of affordable housing which is considered appropriate will be tested through the AHVA	See Officer Action at R109
R180	Anderson	<p>The densities of new developments should be no more intense than the average of the surrounding developments. Where there are no significant dwellings in the area, then the overriding principle must be to ensure that an appropriate street scene is maintained</p> <p>The level of PDL still seems to be too low. If the policy is to redevelop land in preference to building on greenfield sites, then there is a need to continue the pressure on developers to</p>	<p>See Officer Response at R012</p> <p>See Officer Response at R007 re: PDL</p>	None

Rep No.	Name	Summary	Officer Response	Officer Action
		regenerate existing sites. The figure should be set at 40%		
R202	White	Objects to higher density housing – small areas of open space have been lost over recent years. The remaining areas should be retained to give people ‘breathing space’	See Officer Response at R012 and R014	None
R258	Harvey	Densities could be increased by redeveloping and regenerating older areas of Redditch. There are large amounts of areas wasted and some of the properties are poorly designed in comparison to todays standards	See Officer Response at R007 re: PDL	None
R314	Rood	High density housing is not without its problems but should be considered as a first port of call for planning decision making. Aging population and singles/ married couples may be attracted to town centre locations within easy access of social and community facilities and public transport	Support for higher densities in Town Centre locations noted	None

Rep No.	Name	Summary	Officer Response	Officer Action
R379	Turley Associates (Scottish Widows Investment Partnership)	It should be a clear objective to secure a compact town, recycling brownfield sites and building at the highest appropriate densities but not to the detriment of acceptable residential environments	See Officer Response at R012 and R109	See Officer Action at R012 and R109
R380	Jarrett	Supports higher density development in town centre locations and on affordable housing sites	Support for higher densities in Town Centre locations noted	None
R389	Sterry	Supports higher density housing as we need high density/ smaller houses for first time buyers	See Officer Response at R012 and R109	See Officer Action at R012 and R109

Policy 10 Affordable Housing

Rep No.	Name	Summary	Officer Response	Officer Action
R036 R037	Bourne Bourne	Affordable housing should be built on brownfield land or in the town centre. It is unfair and unreasonable to offer affordable housing in rural idylls	<p>The Draft NPPF promotes the development of strong, vibrant and sustainable communities and community cohesion in both urban and rural areas. This means meeting the diverse needs of all people in existing and future communities, promoting personal well-being, social cohesion and inclusion and creating equal opportunity for all citizens</p> <p>To adopt an 'isolated' approach to the location of affordable housing would be contrary to national planning policy</p> <p>A range of both brownfield and greenfield sites have been identified as suitable for housing and will be progressed to meet the needs of our residents in accordance with the SHMA and AHVA</p>	Reference in Policy to SHMA and AHVA
R048	William Davis Ltd	Policy fails to provide a specific requirement for affordable	The Draft NPPF does not make reference to the setting of an	Align policy wording with SHMA and AHVA.

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>housing which fails to provide applicants with any certainty on the level of affordable housing required and the possible influence such a requirement may have on the viability of future residential schemes</p> <p>Welcome the element of flexibility incorporated into the policy where full affordable housing provision may render a scheme undeliverable and unviable. However this flexibility does not absolve the council from testing</p>	<p>overall target for the amount of affordable housing to be provided through the Development Plan process. It does make reference to taking into account information from the SHMA. Officers consider affordable housing provision, based upon the most up to date SHMA evidence offers a better approach to affordable housing delivery. SHMAs are required to be up dated regularly and revisited in full every five years (SHMA Guidance p.61). Furthermore, SHMA evidence will be supplemented by AHVA data. Reliance on evidence which is regularly updated throughout the life of the Plan period offers flexibility within the policy</p> <p>Officers are confident that the AHVA will test viability at the policy level and will make recommendations on an appropriate level of affordable housing that should be sought through said policy</p>	<p>Seek clarity on SHMA and AHVA approach being adopted in the RJ</p> <p>See Officer Action above</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		viability at the policy level		
R064	Paxton	Welcomes the emphasis on affordable housing as a key part of housing development	Support noted	None
R091	Tetlow King	<p>Concerned that this policy includes neither a target nor a threshold for the delivery of affordable housing across the Plan period. With out these figures, the policy is unimplementable and would fail the tests of soundness at examination. The introduction of this policy in advance of any target and testing by a robust viability assessment is premature</p> <p>A target for the provision of affordable housing for each of the urban and rural areas may be useful and provide clarity to developers</p> <p>The Council should also set out the 'exceptional circumstances' in which viability assessments are likely to be required</p>	<p>See Officer Response at R048</p> <p>The SHMA is expected to break housing need data down to sub groups within the Borough and is expected to provide an urban/rural split</p> <p>Officers consider that the 'exceptional circumstances' in which viability assessments are likely to be required are "where</p>	<p>See Officer Action at R048</p> <p>See Officer Action at R048</p> <p>Align policy wording to AHVA</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Agree with the intention to seek mixed tenure and types but recommend that the policy seeks to reflect need as set out in an up to date assessment, taking into account a site's context, rather than a full mix regardless of context</p> <p>Recommend that the Council review the impact of the proposed change to the PPS3 definition of affordable housing and how a flexible approach to delivery can meet local needs across the district</p> <p>Affordable housing should be given sufficient weight and status</p>	<p><i>the economic viability of affordable housing contributions is questionable, and can be fully demonstrated", as stipulated in the current draft policy and is clear</i></p> <p>Policy does not state that a full mix regardless of context is required on all sites. Officers consider that reference to the SHMA will fully take account of the change to the affordable housing definition and offer guidance on appropriate provision within the affordable housing element of any proposal</p> <p>Noted. Officers consider that the Core Strategy achieves this</p> <p>See Officer Response at R036</p>	<p>Refine policy wording of paragraph 1 to reflect site context</p> <p>Align policy wording with SHMA. Seek clarity on approach being adopted in the RJ</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>within the Core Strategy</p> <p>The provision of affordable housing should be viewed within the context of achieving balanced communities and within the wider social exclusion and housing plus agendas. Policies should be included that maximize the reuse of empty properties for affordable housing</p>	<p>The Council has an Empty Homes Strategy 2009-2012, which aims to target homes that have been empty for more than six months. However, bringing homes back into use does not reduce the housing target. The SHMA builds in an allowance for empty properties so the residual target assumes that empty properties will be brought back into use</p>	<p>Reference in Policy to SHMA and AHVA</p>
R095	HCA	<p>Note that further clarity on the policy position will be forthcoming after the testing phase</p>	<p>Noted</p>	<p>None</p>
R100	Selves	<p>Objects to affordable housing at 40% as it will create ghetto regions around the town</p>	<p>The 40% provision rate has historically been sought within the Borough. The AHVA will test whether this level of provision is still appropriate or whether an alternative level of provision should be sought</p>	<p>Align affordable housing provision to findings in the AHVA and reflect these findings in Policy</p>
R125	Barton Willmore	<p>Considers policy is unsound and contrary to PPS3</p>	<p>See Officer Response at R048</p>	<p>See Officer Action at R048</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Policies should set an overall target of affordable housing provision, not merely make reference to the most up to date SHMA</p> <p>It should also set out targets for social rented and intermediate affordable housing, specific sizes and types, the appropriate thresholds for provision, and the approach to seeking developer contributions</p>		
R129(A) R129(B)	Persimmon Homes Persimmon Homes/ Miller Homes/ S&RD	Policy and RJ implies that based on the most up to date SHMA and testing of the 40% affordable housing requirement, the affordable housing requirement may change based on new evidence of need. It is important that changes to provision are articulated at an early date to the development industry. There is a need for maximum certainty based on robust evidence. All changes must be transparent and justified and exposed to full	See Officer Response at R048 Officers appreciate that the development industry need early warning of possible changes to provision in the light of new or updated evidence. All supporting evidence for the CS would be posted on the Council's website and it is therefore suggested that developers are mindful to check the website for the most up to date evidence base when	See Officer Action at R048 Reference in RJ to location of most up to date SHMA and AHVA evidence associated with the policy

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>consultation. Equally, the evidence may reveal a reduced level of affordable housing from 40% given the SHMA evidence of need</p> <p>Query whether the Council's encouragement of low cost market housing would contribute towards the affordable housing requirement on site</p> <p>Given the state of change and uncertainty in affordable housing policy and practice with respect to the Government's new "Affordable Rent" scheme and the prospect of grant funding</p>	<p>progressing development schemes</p> <p>It is acknowledged that the definitions and qualifying parameters for affordable housing are changing, especially in light of the emerging Localism Bill and the new Affordable Rent Scheme which was released in April 2011. Officers consider that the policy wording needs to be altered to reflect these circumstances and to clarify what elements of low cost market housing do contribute towards the affordable housing target, with reference to the SHMA</p> <p>The SHMA will take account of the changing affordable housing agenda and incorporate recommendations regarding the Affordable Rent Scheme. The policy should be altered to reflect</p>	<p>Amend policy wording to reflect which elements contribute towards the affordable housing target and cross reference policy/RJ to SHMA. Consider detailed definitions in the CS Glossary. Consider revision of Affordable Housing SPD to align with the new government agenda</p> <p>As above</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		withdrawal, RBCs approach to affordable housing provision will need to be re-examined to take these factors into account	this position and make reference to the SHMA	
R174	Bedford-Smith	Support for shared equity housing (suggests a shared equity scheme at Car Park 4)	Negotiations with the landowner indicate that redevelopment options for car park 4 are highly unlikely to come forward	None
R258	Harvey	Council and/ or Affordable Housing could be much more appropriately located	See Officer Response at R036	See Officer Action at R036
R331	Downing	Consider demolishing the sub standard housing on Salters Lane and replacing with affordable housing units. The present occupants are not interested in the large garden areas associated with these properties	Site suggestion acknowledged. Officers will pursue this option and report back via the SHLAA update	This site has been considered by Housing Strategy and it did not present a viable option for redevelopment due to the reduction in numbers of affordable housing and the cost at the time

The New Homes Bonus is a Government incentive scheme which provides funding to local authorities to increase their housing supply.

5. Do you think that more homes should be built in order to receive more money from the New Homes Bonus incentive?

Rep No.	Name	Summary	Officer Response	Officer Action
R007	Cardew	Houses should not be built just for cash incentives; they should be built based on housing need. Should not be a bribe to build.	Housing targets will be based on identified need and therefore the News Homes Bonus received by the Council for completed dwellings will not be an incentive to build more homes than necessary	None
R008	Rose			
R009	Hughes			
R015	Batty			
R016	Rowell			
R018	Coombs			
R019	Morris			
R020	Baker			
R021	Carpenter			
R023	Phillpotts			
R029	Ostroumoff			
R036	Bourne			
R037	Bourne			
R038	Smith			
R039	Allen			
R040	Emms			
R042	Best			
R044	Allbutt			
R045	Smith			
R046	Lippett			
R049	Haigh			
R050	Haigh			
R051	Haigh			

Rep No.	Name	Summary	Officer Response	Officer Action
R052	Haigh			
R054	Mason			
R057	Sinclair			
R061	Homer			
R063	Evans			
R074	Griffiths			
R076	Mason			
R082	Ramsay			
R101	Davies			
R116	Smith			
R118	Bartley			
R123	Mills			
R309	Moxon			
R310	Waldron			
R311	Hatton			
R312	Hatton			
R318	Bonham			
R343	Smith			
R344	Newburn			
R345	Flowers			
R346	Sims			
R347	Cruyton			
R348	Miller			
R349	Rose			
R350	Cale			
R351	Warby			
R352	Warby			
R354	Khoury			

Rep No.	Name	Summary	Officer Response	Officer Action
R355 R356 R357 R381 R383 R384 R385 R386 R387 R389 R390	Kloetzli Anderson Bradshaw Edmunds Sinclair McQuaid McQuaid McQuaid McQuaid Sterry Blakeway			
R010 R022 R034 R035 R059 R080 R096 R100 R105 R106 R109 R113 R115 R117 R120 R121 R122	Barber Clark Sharpe Evans Watkiss White Griffin Selves Dewhurst Jobson Smith Stallard Hayfield Cotton Styler Styler Carter	No	See Officer Response at R007	See Officer Action at R007

Rep No.	Name	Summary	Officer Response	Officer Action
R124 R162 R169 R172 R173 R176 R177 R178 R202	Hughes Campbell Showell Heaselgrave Coombes Styler Styler Styler White			
R012	Lewis	No – Housing should not replace Green Belt land	See Officer Response at R007 Housing will only be designated on Green Belt land if there is insufficient alternative land to meet need and exceptional circumstances exist	See Officer Action at R007
R024 R055	Theobald Wakeman	No – It would provide an incentive for Councils to build more than was required	See Officer Response at R007	See Officer Action at R007
R025 R028	Barber Lynn	No – The charm of the town and countryside should not be sacrificed for money	See Officer Response at R007	See Officer Action at R007
R041	Patten	No – more homes increases pressure on services. Additional money will not benefit existing residents	See Officer Response at R007 Development schemes must provide all necessary infrastructure, which through CIL	See Officer Action at R007

Rep No.	Name	Summary	Officer Response	Officer Action
			and S106 negotiation will address the need for additional services	
R043	Rixon	No – Its an excuse to build on greenfield land. Query – what happens to the money? Is it enough to look after all the extra people you are drawing to the area? The money is not an answer to the Council's problems, it's the start of thousands of new ones	See Officer Response at R007 Monies received will be considered by Council when it sets budgets and priorities	See Officer Action at R007 None
R064 R084 R314	Paxton Cunningham Rood	Housing target should not be increased just for financial gain unless a case for increased need can be made	See Officer Response at R007	See Officer Action at R007
R092 R104 R108 R119	Gallagher Estates Ltd Green Hawkins Danks	Yes	See Officer Response at R007	See Officer Action at R007
R174	Bedford- Smith	No – this is another step on the road to buying planning permission. Seen as a breach of Localism by negotiating with developers over the heads of voters	See Officer Response at R007	See Officer Action at R007

Rep No.	Name	Summary	Officer Response	Officer Action
R197 R198	Hirst Marks	It appears that the LA may be keen to benefit from grants/payments so that they can secure and use the funds to accommodate affordable housing. This should not be done to the detriment of existing community/residents of east and west Brockhill	See Officer Response at R007	See Officer Action at R007
R380	Jarrett	Our Borough is too tightly constrained to sustainably create more housing than is absolutely necessary	See Officer Response at R007	See Officer Action at R007

Policy 11 Gypsies, Travellers and Travelling Showpeople

Rep No.	Name	Summary	Officer Response	Officer Action
R026	Alice de la Rue OBO Derbyshire Gypsy Liaison Group	A timescale should be attached to delivering the showmen plots/ transit pitches in accordance with the findings from the GTAA and the Core Strategy.	Agreed. The policy will be amended in line with the emerging evidence (SHMA) which will provide up to date information on need. Once this study is completed the policy will be updated accordingly.	Amend policy in line with the findings of the SHMA.
		Criterion i should be amended by deleting the words <i>'in close proximity to'</i> and replacing with <i>'within a reasonable distance of'</i> . In order for the Policy to conform to current government policy (Circulars 01/2006 and 04/2007). This would make the policy more effective and realistic in delivering sites.	Agreed, the Policy will be amended in line with the suggested wording.	Delete <i>'in close proximity to'</i> and replace with <i>'within a reasonable distance of existing facilities and transport networks with satisfactory access and highway arrangements'</i> .

		Criterion iv should be amended to read ' <i>will not result in unacceptable disturbance or loss of amenity</i> '. The insertion of the word 'unacceptable' is to ensure that a reasonable approach is taken to the assessment of new development, since all new development can be argued to have an impact on amenity, but it is the degree of the impact that is important.	Agreed, the Policy will be amended in line with the suggested wording.	Amend criterion iv to read ' <i>will not result in unacceptable disturbance or loss of amenity</i> '.
		Criterion v needs to be amended to read, ' <i>have, or be capable of having...</i> '	Agreed, the Policy will be amended in line with the suggested wording.	Amend criterion v to read, ' <i>have, or be capable of having a satisfactory water supply, sewerage and refuse disposal facilities</i> '
		It would be useful to liaise with the Showman's Guild in the area and see also Travelling Showpeoples sites – a planning focus (2007).	Agreed, the Showman's Guild will be directly consulted with regard to the emerging policy.	Consult with Showman's Guild regarding the emerging Policy.
		It would be useful to set out monitoring arrangements and delivery mechanisms.	Monitoring arrangements and delivery mechanisms will be incorporated into the policy. However this detail will be informed by the emerging SHMA.	Include Monitoring and Delivery arrangements into the policy one the SHMA is received.
R126	R Whiteman OBO	Refer to comments made to Preferred Draft Core Strategy May	The requirement for applications to consider flood risk is	None.

	Environment Agency	<p>2009. Previous comments state; “We would recommend that the last sentence of Policy SC.6 is altered to include reference to flood risk as follows:</p> <p><i>‘There will be a presumption against proposals in flood zone 3 and the Green Belt, unless exceptional circumstances are demonstrated.’</i> The reasoned justification for including a reference to flood risk would be that permanently occupied caravan, mobile home and ‘park home’ sites (including gypsy and traveller sites) are regarded as ‘highly vulnerable’ development in PPS25. It is acknowledged that the instability of these structures places their occupants at special risk and they are likely to be occupied during periods when flood risk is higher (all year). ‘Highly vulnerable’ development should not be permitted within flood zone 3.”</p>	adequately detailed in Policy 2 ‘Flood Risk and Water Management’ with adequate reference to PPS25 and therefore it would be unnecessary to repeat it here. When applications are submitted this policy would be considered and therefore vulnerability and risk would be considered at this point.	
R128	H Pankhurst OBO Natural England	Welcome references to landscape, waste supply and sewerage. Rather than saying the	A Landscape and Visual Assessment is required as part of the Borough Councils Local	None.

		<p>Worcestershire Landscape Character Assessment will be borne in mind, which places the onus on the Council to undertake an assessment, it may be preferable to require a landscape and Visual Impact Assessment as part of a planning application, when appropriate. The protection of biodiversity also needs to be taken into account.</p>	<p>Validation Checklist in appropriate circumstances.</p> <p>With regard to biodiversity, this will be ensured through Policy 2 'Natural Environment'.</p>	
R378	Worcestershire County Council	<p>Would emphasise that constraints on Gypsy and Traveller Accommodation should not be more demanding than for other types of accommodation [see <i>previous comments to Preferred Draft Core Strategy 2009</i>].</p>	<p>It is considered that the approach taken by the policy to Gypsy and Traveller provision is adequate and the requirements within this Policy Gypsies and Traveller sites is essential to ensure deliverable, high quality site provision.</p>	None.
		<p>Would like to see acknowledgement and consideration of the need/ demand for individual building plots for Gypsy families i.e. they don't all want to live in conventional housing or on managed sites.</p>	<p>The Policy will reflect the need and demand of Gypsies and Travellers which is informed by the emerging SHMA and provision will be made for this in the emerging policy.</p>	Amend policy in line with SHMA when received.

Employment Question from Questionnaire

The Policy for employment land bases the employment target on the Regional Spatial Strategy allocation 11. Do you think this target should be flexible to suit the needs of businesses, which will continually change?

Yes or no, please explain

Rep No.	Name	Summary	Officer Response	Officer Action			
R007	Cardew	<p>Yes Reasons why yes: Employment target should be flexible to suit needs of all businesses, not just the traditional employment uses found within use classes B1, B2 and B8.</p> <p>A flexible approach should be adapted in order to prevent land being unused</p>	<p>It is considered that the most appropriate approach for the emerging plan is to make provision for an employment land target as this allows us to plan for the future. The draft National Planning Policy Framework and the recent consultation on Change of Use allows for flexibility with regard to responding to changing economic circumstances.</p>	None.			
R008	Rose						
R009	Ostroumoff						
R010	Emms						
R015	Hughes						
R016	Barber						
R018	Batty						
R019	Rowell						
R020	Coombs						
R021	Morris						
R022	Baker						
R023	Carpernter						
R024	Clark						
R025	Phillpotts						
R027	Theobald						
R029	Barber				<p>Already too many offices and factory units empty, the Council should conduct a survey to determine future requirements and utilize the existing units before building more.</p>	<p>The current employment provision is not sufficient to ensure a sustainable supply up to 2031. An Employment Land Review was conducted in 2009 to determine the employment requirements and has been updated annually</p>	None.
RO36	Planning						
R037	Prospects						
R038	Bourne						
R039	Bourne						
R040	Smith						
R041	Allen						

R042	Best		since. This study provides the evidence to support the amount of land allocated in the emerging plan.	
R043	Rixon			
R044	Allbutt			
R045	Smith			
R046	Lippett			
R049	Haigh	High tech businesses should be encouraged to come to Redditch by building a campus area on one of the allocated spaces.	This is not prohibited by the emerging plan and the location on high-tech businesses in Redditch would be encouraged and supported through the emerging plan.	None.
R050	Haigh			
R051	Haigh			
R052	Haigh			
R053	Timothy			
R054	Mason			
R055	Wakeman			
R057	Sinclair	More space should be allocated for small and medium factory units.	The employment land target will be set through the emerging plan, small and medium sized factory units can be developed as part of this target, although it is too specific to designate land for a particular sized unit.	None.
R059	Watkiss			
R061	Homer			
R063	Evans			
R065	Porteous			
R067	Hill			
R074	Griffiths			
R076	Mason			
R080	White	Find ways to encourage existing firms to expand.	There will be a policy contained within the emerging plan which will support businesses expanding through diversification.	None.
R082	Ramsay			
R101	Davies			
R103	Smith			
R104	Green	A Borough should be created where businesses can thrive and prosper.	That is the intention of the Core Strategy and one of the overarching themes.	None.
R106	Jobson			
R108	Hawkins			

R109	Smith	Target should be flexible as we are still in a recession, with the recovery not yet clear.	It is important that the employment land target in the emerging plan is fixed to ensure the plan is deliverable, however the Draft National Planning Policy Framework and the recent consultation on Change of Use allows for flexibility.	None.
R113	Stallard			
R115	Hayfield			
R116	Smith			
R118	Bartley			
R119	Danks			
R122	Carter			
R123	Mills			
R162	Campbell			
R173	Coombes	Any change from manufacturing to services could free up land for housing.	Provision will be made for all types of employment land including manufacturing type uses. Provision will also be made for residential development.	None.
R174	Bedford-			
R310	Smith			
R311	Hatton			
R312	Hatton	There is no point in having a fixed approach to this, there needs to be a reasonable belief that if development takes place it will be utilized. However there needs to be ability to provide more if demand exceeds supply, subject to location.	The Draft National Planning Policy Framework and the recent consultation on Change of Use allows for this flexibility and changing economic circumstances.	None.
R314	Rood			
R318	Bonham			
R343	Smith			
R344	Newburn			
R345	Flowers			
R346	Sims			
R347	Crupton			
R348	Miller			
R349	Rose			
R350	Warby	The target should be flexible to attract the right businesses and avoid having empty buildings.	The emerging plan will seek to attract businesses to Redditch whilst still making provision for a certain amount of employment plan for the plan period.	None.
R351	Warby			
R352	Khoury			
R354	Kloetzli			
R355	Kloetzli			
R356	Kloetzli			
R357	Anderson			
R380	Bradshaw			

R381 R383 R384 R385 R386 R387	Jarrett Edmunds Sinclair McQuaid McQuaid A McQuaid McQuaid Cale		consultation on Change of Use allows for this flexibility and changing economic circumstances. With regard to vacant buildings, the amount of empty office and industrial space in Redditch is lower than the national average and the amount needed for market churn and therefore this is not an issue in Redditch.	
		Factories should be built to fit needs not ‘one size fits all’ before a client has been secured to rent/buy it. Factories are standing empty for years on Greenfield sites and do not achieve income and waste the land. There are empty factories and trading estates (off Ravensbank Road), what is being done to attract tenants to these? Existing units should be used before new ones built.	The amount of empty office and industrial space in Redditch is lower than the national average and the amount needed for market churn and therefore this is not an issue in Redditch.	None.
		The town has too many charity shops that are the only tenants who can afford to trade in this economic climate and rely on volunteers – how does this create	Retail units are part of the ‘A’ use classification; any business that comes within this use class can locate in a vacant unit.	None.

		employment.		
		Over a 15 year period some aspects will change but there must be a basic policy.	Agreed.	None.
		Full utilization and improvement of business and industrial parks should be in place before new employment facilities are built.	The current employment provision is not sufficient to ensure a sustainable supply up to 2031. An Employment Land Review was conducted in 2009 to determine the employment requirements and has been updated annually since. This study provides the evidence to support the amount of land allocated in the emerging plan.	None.
		Economic conditions fluctuate and housing needs are directly related to business needs in an area.	Agreed. The Draft National Planning Policy Framework is flexible enough to deal with this.	None.
		Particularly in a recession – businesses must be able to develop, change and expand without unnecessary constraints in order to maximize employment opportunities and increase job availability.	The Draft National planning Policy Framework and the recent consultation on Change of Use allows for this flexibility.	None.
		Economic and social needs change with developing new	Agreed.	None.

		technologies.		
		Needs change with Government policies.	Agreed.	None.
		Plans for the future should reflect the needs of businesses.	Agreed, the Employment Land Review demonstrates the needs of businesses and the emerging plan will reflect this.	None.
		It is essential to attract new business to Redditch so flexibility is important.	Agreed, encouraging business growth and economic prosperity is a key theme of the emerging plan.	None.
R012 R034 R035 R096 R100 R120 R121 R169 R172 R202 R309 R390	Lewis Sharpe Evans Griffin Selves Styler Styler Showell Heaselgrave White Blakeway Moxon Waldron	No. Reasons why no: The strategy should be based on the actual requirements of the area as in Redditch not the region. By agreeing a time limit for review the costs involved with assessing the business needs are not reviewed unnecessarily.	The emerging plan will be based on the employment requirements of the Borough. A review of the emerging plan will take place when it is deemed necessary due to changing circumstances.	None.
		The Town Centre is not fully used (as report indicates) and the outer area has vacant units.	It is the intention of the emerging plan to ensure all space in Redditch is used in the most efficient manner, however additional space for employment, retail and housing is needed to plan up to 2031. With regard to vacant buildings, there amount of	None.

			empty office and industrial space in Redditch is lower than the national average and the amount needed for market churn and therefore this is not an issue in Redditch.	
		Empty office and commercial space that is unoccupied should be used first.	Agreed, however additional office and commercial space will be needed to ensure the needs over the plan period are met. With regard to vacant buildings, there amount of empty office and industrial space in Redditch is lower than the national average and the amount needed for market churn and therefore this is not an issue in Redditch.	None.
		Flexibility is pejorative. It should be up to the community and planners to discuss the current requirement rather than creating an avenue for 'flexibility' becoming a blueprint for justifying development without boundaries.	The emerging plan will be based on the employment requirements of the Borough.	None.
		Flexibility means no control.	The emerging plan will be based on the employment requirements of the Borough. This will allow us to plan adequately up to 2031. The draft NPPF and recent	None.

			consultation on Change of Use will allow a certain amount of flexibility to all the Borough to respond quickly to changing market conditions. It is the emerging plan which will allow there to be a planned approach will can be delivered.	
		Need to have a consistent target for planning.	The emerging plan will be based on the employment requirements of the Borough. A review of the emerging plan will take place when it is deemed necessary due to changing circumstances.	None.
		Redditch has a high proportion of manufacturing businesses compared with the rest of the country and region. Also distribution, hotels and the restaurant sector. Why do we have this make up of employment types? Building more factories will create factory workers close by. Don't continue to make Redditch an industrial estate.	Provision will be made for <i>all</i> types of employment that are required following the Employment land Review.	None.
R117	Cotton	How can the target be flexible when you have already decided how much land and where?	The emerging plan will set a target based on need; however there is scope within the draft	None.

			National Planning Policy Framework and the recent consultation on Change of Use allows for flexibility.	
--	--	--	---	--

Policy 12 Location of New Employment

Rep No.	Name	Summary	Officer Response	Officer Action
R030	Worcestershire County Council	Bullet point i. should be amended to: <i>“Close proximity to suitable transport routes <u>and services</u>, having regard to the scale and nature of <u>the travel demand across all modes</u> likely to be generated”.</i>	Agreed, policy wording will be amended in line with suggested text.	Amend policy to the following: <i>“Close proximity to suitable transport routes and services, having regard to the scale and nature of the travel demand across all modes likely to be generated”.</i>
		Bullet point ii. Should be amended to; <i>“Are accessible from existing residential land by all appropriate modes of transport and are not dependent upon access by private transport, where amenity is not negatively affected”</i>	Amend wording of policy as suggested.	Amend policy to the following: <i>“Are accessible from existing residential land by all appropriate modes of transport and are not dependent upon access by private transport, where amenity is not negatively affected”</i>

	<p>Amend section C of Policy 12 to; “C. Impact on the Highway (Transport Network) <i>Uses which generate high vehicular movement particularly for warehouse and distribution proposals can have impacts on the <u>transport network</u>.</i> <u>Development proposals must be supported by the appropriate Transport Assessment or Statement which sets out the impact on the transport network across all modes of transport and demonstrates how adverse impacts will be mitigated, including through investment in transport infrastructure and services and Travel Plans. Please see Worcestershire County Council LTP3 and associated policies, including the Development Control (Transport) Policy.</u></p> <p><i>Where proposals are going to increase traffic, it will be for the applicant to demonstrate that the local transport system is capable of accommodating the <u>additional demand for travel, sustainability.</u></i></p>	<p>It is considered that the Policy will be amended slightly as per suggestion; however the detailed wording suggested is more suited to Policy 4 (Sustainable Travel and Accessibility).</p>	<p>Amend wording of Policy to the following, “<i>Uses which generate high vehicular movement particularly for warehouse and distribution proposals can have impacts on the transport network. Development proposals must be supported by the appropriate Transport Assessment or Statement to demonstrate the impact on the transport network and how adverse impacts will be mitigated against.</i>”</p>
--	--	---	---

		<u>safely and efficiently, in line with the Worcestershire LTP3 and as set out in Policy 4 (Sustainable Travel and Accessibility) of the Core Strategy.</u>		
R014	B Sharples OBO Sport England	Reference policies 12 – 14 – consideration of the impact on sport infrastructure should be given by the increase of employment. Refer to Paragraph 2 of PPG 17 which states “ <i>as a minimum, assessments of need should cover the differing and distinctive needs of the population for open space and built sports and recreational facilities (as outlined in the annex). The needs of those working in and visiting areas, as well as residents should also be included.</i> ”	Officers acknowledge that those in employment place a demand on sports facilities and this should be considered when planning for the provision of sports. However it is considered that the emerging plan is flexible enough to ensure future provision is based on all needs including the working population.	None.
R126	R Whiteman OBO Environment Agency	Section D of the above Policy recognizes the need to provide new waste management facilities. As population projections are likely to increase this will be accompanied by a corresponding increase in waste production from these extra households and businesses. It is important that sufficient waste management	Agreed. The Worcestershire County Council Waste Core Strategy has had full regard for projected population increases and subsequent waste facility demand.	None.

		facilities are available to meet needs.		
		The timing and delivery of new waste management infrastructure should be synchronized with the phasing of development of residential and employment land so as to ensure that new facilities become available when they are needed.	Agreed, this concern will be submitted to Worcestershire County Council in response to the Waste Core Strategy. In addition the need for new waste management facilities- their timing and delivery will feed into the Councils Infrastructure Planning work.	Submit comments to Worcestershire County Council and ensure Infrastructure work has regard to the need for a new waste management facility.
R128	H Pankhurst OBO Natural England	Support for this policy, particularly point B iii.	Support noted.	None.
P180	Anderson	Care needs to be taken in wording on strategy to ensure that prospective employers are not discouraged by statements that say biodiversity are more important to planning than the creation of jobs within the borough.	It is considered that the policy does not put more emphasis on biodiversity than the economy; both should be detailed considerations when preparing proposals and when considering planning applications. The Draft National Planning Policy Framework places significant weight on economic priorities and this draft framework feeds into the	None.

			preparation of the emerging plan.	
R129 (A) and (B)	RPS OBO Persimmon Homes South Midlands (A) and Persimmon Homes South Midlands, Miller Strategic Land and Southern & Regional Development s (B).	Support the flexible approach to employment land provision based on market requirement and agree that the uses provided should not be restricted in the Core Strategy.	Support noted.	None.
		The potential for proposals to be refused because they may be considered by the Council's Economic Development Team not to be in line with Borough Councils economic priorities at the time is not appropriate for a policy. Rather, the development plan should set out clearly what the economic priorities are from the outset and a plan review should be undertaken if these are to be altered. The current wording could allow the local planning authority to refuse permission because of a change in view by officers of economic priorities with no consultation. This level of uncertainty could result in a deterrent to investment which cannot be the intention of the policy. The strategy set out in this policy is unclear and should be expounded with explicit economic	It is considered the most appropriate approach is to set out the Councils Economic Priorities in the Employment Land Review. These priorities will trigger the need for certain land uses which will be prescribed in the emerging plan. As the Councils economic priorities can change it is not suitable to detail them in the emerging plan. The emerging plan will allow for the needs of the Borough to be met but will also be flexible enough to allow for changes in the economy.	None.

		priorities.		
		The plan lacks detail on which sites make up the 33.3ha employment land provision. An employment land appendix should be included within the Core Strategy based on the Employment Land Review update. This would be consistent with the approach to housing provision. This will quantify the employment land contribution proposed at Brockhill East and other locations.	Agreed. An Employment Land Appendix will be included within the emerging plan, informed by the Employment Land Review.	Include an Employment Land Appendix informed by the Employment Land Review.
		Support the total aggregate approach which should be preferred to the rolling reservoir model included in the emerging WMRSS2. The former can be phased in respect of release but allows appropriate flexibility to meet investor requirements which can arise over the plan period.	It is considered that the most suitable approach is to provide a total employment land requirement for the plan period, which is supported by a rolling reservoir of a certain amount of land.	None.
		Employment land requirement should be revisited in the context of the extended plan period.	Agreed this will be considered further in preparation for the next stage of the Core Strategy.	Consider the employment land requirement in line with the extended plan period.

		<p>The need for cross-boundary joint working to meet strategic employment land requirements should be identified in the Core Strategy. It is understood that Bromsgrove District is proposing the release of land north east of the Ravensbank Business Park for employment use and that the land at Winyates Green Triangle in Stratford-on-Avon District is not now considered deliverable. The implications of this, including the potential need to propose an employment land allocation on the A435 ADR land should be considered.</p>	<p>This is currently being considered, further proposals on cross-boundary working will be detailed during the next consultation on the emerging plan.</p> <p>A Review of the A435 will be conducted to consider where there is potential for development.</p>	
		<p>The Employment Land Strategy should be clarified further and an appendix provided in the Core Strategy setting out the distribution and locations of the Principal Land allocations (33.3ha) in Policy 12.</p>	<p>An appendix will be provided which details the sites needed to meet the employment land target.</p>	<p>None.</p>

		The restriction of employment uses on the site (Brockhill) to B1 offices only is not appropriate. There should also be greater flexibility over the scale of office development permitted in the IN67 employment land proposal carried forward within the emerging Core Strategy (Policy 30 from the adopted Local Plan).	See response to Policy 29.	None.
R378	Worcestershire County Council	Unsure whether policy can/ should stipulate that the use of a site needs to be in line with the economic priorities. However it can and should ensure that land is available that would be suitable for the types of uses that are of priority.	It is considered that it is appropriate to ensure that the use of an employment site is in line with the Councils economic priorities. The economic priorities will be set out the Councils Employment Land Review and will inform what type of employment use a site should be used for. It is the intention of the plan to ensure that land is available to meet need.	None.
		The County Employment Requirements Study (GVA Grimley 2007) identifies that the amount of employment land required will be affected by the amount of land needed for waste facilities. Jobs in the recycling and refuse disposal sectors have not	The ELR sets out that an additional 6ha of land will be required for waste facilities; this will be incorporated into the emerging plan.	Include in emerging plan a reference to the allocation in the emerging Waste Core Strategy.

		been included in the LEFM forecasting.		
		Support reference to emerging Waste Core Strategy.	Support noted.	None.
		Would welcome an understanding of the consideration of the impact on provision of employment land and how this fits with Policy 12 A and the aspiration of the Redditch Economic Development Strategy.	The Councils Economic Development Strategy sets out the Councils Economic Priorities. These priorities inform what type of land will be required through the emerging plan.	
		Redditch should be one the locations for new waste facilities.	Agreed, this is stipulated in the County Councils Waste Core Strategy and referenced in Policy 12.	None.
		Should identify whether the figure identified through the RSS also excluded recycling and refuse disposal sectors and therefore identify what effect the loss of employment land to these sectors would have on the need for employment land across the Borough.	The ELR Update conducted in 2011 has stipulated that an additional 6ha of land will be required for waste facilities; this will be incorporated into the emerging plan. Therefore there will not be a loss of employment land to waste facilities as this provision is in addition too the employment land requirement.	None.

R378	Worcestershire County Council	Section A, 2 nd paragraph. It is not clear whether this means the Economic Development team will be consulted during planning application as at present, or if planning applications will need to meet criteria which reflect specific Economic Development priorities and could in effect be “veto-ed” by Economic Development Officers or Councilors. Which priorities are being referred to?	The Priorities are those contained within the Borough Councils Economic Strategy. It is not appropriate to detail these priorities within the merging plan as they could be subject to change however they will be detailed in the Employment Land Review. The emerging plan requests that proposals are in line with these priorities. As the priorities are subject to change each application will be assessed on its merits however it is preferable if applications are in line with the priorities.	None.
		Would like to see Policy WCS 14 of the submitted Waste Core Strategy referred to.	Agreed, this policy will be referred to in the Reasoned Justification to the Policy.	Include reference to see Policy WCS 14 of the submitted Waste Core Strategy in the Reasoned Justification.
		Section d. Consider changing the term ‘may’ to ‘will’ or ‘it is very likely’ as it is likely that new facilities will be needed in Redditch.	It is agreed that the wording in this section could be improved; therefore the policy will be amended to, “ <i>Where new sites will be required for waste facilities in order to cope with demands from new growth employment land in the Borough may be suitable for these new facilities.</i> ”	Amend wording to, “ <i>Where new sites will be required for waste facilities in order to cope with demands from new growth employment land in the Borough may be suitable for these new facilities.</i> ”

		Consider inserting a reference to how new development would be required to fit into the landscape (refer to paragraph 3.24 and 3.25 in the submitted Waste Core Strategy).	It is considered that this is covered adequately elsewhere in the Core Strategy for example there is a policy which focuses on High Quality and Safe Design and also on the Natural Environment, and therefore does not require repeating here.	None.
--	--	--	---	-------

Policy 13 Development within Employment Areas

Rep No.	Name	Summary	Officer Response	Officer Action
R006 R010	Bish Barber	Do not need any more industrial buildings as there are lots of empty industrial buildings and older people don't need jobs.	The Core Strategy currently plans up to 2026 and is likely to run up to 2031, between now and then more, and varied types of employment areas will be required. The Core Strategy also plans for the change in and the increasing population.	None.
R027	C Dodds OBO Planning Prospects	The first sentence of this policy should be deleted as this would prevent non-employment development in development areas. This is at odds with the criteria based approach which is in the rest of the policy.	It is the intention of the policy to prevent non-employment development in employment areas and therefore this sentence should be retained. The Draft NPPF states that to support economic development Local Planning Authorities should,	None.

			<i>“identify priority area for economic regeneration, infrastructure provision and environmental enhancement.”</i> (page 19).	
		This policy should control not prohibit non-employment development.	It is considered that this policy does control and not prohibit non-employment development. In line with the Draft NPPF the policy plans for priority areas for economic regeneration but also allows flexibility for a changing market.	None.
		A criteria based approach to the control of such development is appropriate. However the current criteria are overly restrictive and ignore exceptional circumstances e.g. where a requirements cannot be fully met but there would be overriding benefits.	It is considered that the current criteria are appropriate with regard to Redditch’s economic climate. Exceptional circumstances will be assessed on their own merits and will be subject to the applicant demonstrating what their exceptional circumstances are. This is in line with the approach advocated in the Draft NPPF.	None.
		A further criterion should be added which states, <i>“iv. Where these criteria are not fully met, non-employment development will only be allowed where overriding benefits of such</i>	This criteria would not be relevant to this Policy as this is not the intention of the Policy. The Draft NPPF provides this flexibility.	None.

		<i>development can be shown, for example in terms of regeneration, investment or job creation.”</i>		
R030 R378	Worcestershire County Council	Amend bullet point iii. Sub bullet point 2 to: <i>“it causes substantial <u>transport network</u>, highway or traffic problems;”</i>	Agreed, policy will be amended to reflect suggested wording.	Amend policy to: <i>“it causes substantial transport network, highway or traffic problems;”</i>
		The sentence in the Reasoned Justification which states <i>“Having an available supply of employment land is essential to the economic well-being and development of Redditch”</i> . This would benefit from more context and cause-effect explanation.	The need for an available supply of employment land is well documented at the national level (see Draft NPPF) and would not benefit from repetition here.	None.

Policy 14 Office Development

Rep No.	Name	Summary	Officer Response	Officer Action
RO12	Lewis	Object to development at Brockhill as offices are not let in the area and the Town Centre requires more office space as it is near to the main transport routes.	With regard to the location of Brockhill for office development this land has been assessed and is considered as being suitable for office accommodation. The Draft National Planning Policy Framework no longer requires	None.

			office accommodation to follow the 'Town Centre First' Policy and proposals should be judged on their individual merits.	
R092	R Mitchell OBO WYG Planning & Design OBO Gallagher Estates Ltd	Support the provision of additional office development in the Town Centre and note the proposal to provide 8,000sqm of office space outside of the Town Centre.	Support noted.	None.
		Given that IN67 is intended for B1 office use, Gallagher consider that the policy priority on the remainder of the Policy 29 strategic site should be the allocation of land to meet housing requirements, particularly in the light of the shortfall of housing land proposed to be delivered against identified WMRSS EIA Panel Report recommendations.	There is a need for housing and employment in the Borough for further detail on this see response to Policy 29.	None.

		It should be ensured that existing employment allocations outside of the Town Centre already served by infrastructure e.g. site IN67 of adopted Local Plan located to the north-west of the Town Centre, are brought forward for B1 class office development before additional allocations outside of the Town Centre are developed, in accordance with sustainability objectives. Draft Policy 14 should be revised to specify these requirements.	The Draft National Planning Policy Framework no longer requires office accommodation to follow the 'Town Centre First' Policy and proposals should be judged on their individual merits.	None.
R180	Anderson	The Office Needs Assessment was designed to show that the level of office accommodation required to be built within the Town Centre environment was beyond the capacity of the infrastructure. It made no assessment of the actual future needs for office accommodation within the Borough in terms of size, facilities, use and design. It also required most office accommodation to be close to the Town Centre, a dated practice that would have condemned Redditch to restricted growth in this area of employment.	The purpose of the Office Needs Assessment was to look at what the office needs were within the Borough for the plan period. One of the outcomes of this assessment was that the office requirements were beyond the capacity of the Town Centre however the Draft National Planning Policy Framework no longer requires office accommodation to follow the 'Town Centre First' Policy and proposals should be judged on their individual merits.	None.

		<p>Within Redditch there is a lot of accommodation in the town and in rural settings. Both options are difficult to let because of the shift in the way business is done, there has been a reduction in the amount of office space needed. There is a requirement now for structures that accommodate offices, manufacturing, storage and distribution into integrated establishments.</p>	<p>There is a difference between the demand for offices and the way in which office needs are calculated. The way the need in Redditch is determined does take account of the changing demands. However the emerging plan does not preclude multi-functional buildings being developed in Redditch should the need arise, however it does not specifically promote them as this is too specific and speculative for the plan and subsequent delivery on a specific site is not certain.</p>	<p>None.</p>
		<p>The need for large office blocks may have departed. High rentals, insistence on costly parking facilities, congestion at the start of the ringway in the morning and end in the evening, and cheaper options have affected demand. Re-organizing departments may lead to a new demand but this</p>	<p>It is agreed that there are a number of reasons for changes to the demands for different types of offices. The demand for employment land and offices will be quantified through the Employment Land Review and Office Needs Assessment respectively however specific re-</p>	<p>None.</p>

		should be quantified.	organizing of departments is considered to be an issue for the businesses and there is no appropriate planning control for this.	
		Accommodation in more rural positions has faired better during recession, but there are still several empty sites that have proved difficult to let. This begs the question - why are we designating IN 67 as entirely office accommodation when the demand for this type of structure is questionable.	IN67 was designated as employment (B1, B2 or B8) in local plan No.3 and was unimplemented. Please see response to Policy 29 (Strategic Policy Brockhill East).	None.
		The Employment Needs Assessment identifies pieces of land that could be used to meet a government set target. It takes no cognizance of the redevelopment of existing sites, the potential for a continuation of this process, nor does it make any attempt to quantify the future demand of existing and emerging businesses. Employment needs assessment should also identify the resources available and the specific industries that should be	The Employment Land Review does take into account the reuse of sites (this is called churn) and is factored into when considering need. The primary employment areas are encouraged to re-develop for employment purposes.	None.

		<p>encouraged to increase the employment opportunities of the existing population. It should not simply encourage investment per se, a practice which in the past has resulted in an increasing number of locally unemployed men and women because opportunities have not been matched to their abilities. This is particularly relevant when the policy of diversification has been pursued recently. The number of jobs created within the Borough has risen steadily, but frequently to the benefit of adjacent communities and immigrants who stay for a few years.</p>		
--	--	---	--	--

Policy 15 Rural Economy

Rep No.	Name	Summary	Officer Response	Officer Action
R014	B Sharples OBO Sport England	There are economic benefits of sport in the West Midlands (growth figures quoted in representation). Sports and associated industries employ a large amount of people in the West Midlands and is growing (statistics quoted in representation). Indicators demonstrate that sport plays a vital role in the economy in the West Midlands.	Agreed, sports provision does account for employment within the Borough, however this is too detailed to be contained within the Core Strategy.	None.
		Consideration should be given in particular in the rural areas to the attraction and retention of sports use of land. Motor sports, equestrian and gun sports which require great land take are not suitable in an urban setting.	Agreed, it is considered that this is not restricted by the Core Strategy. In Redditch's rural area, much of the areas for these uses are washed over with a Green Belt designation which provides some degree of policy protection.	None.

R064	J Paxton & D Johnson OBO The Diocese of Worcester	<p>The proposed strategy seems to concentrate only on conversion or change of use of buildings. Although this is welcomed, the strategy should include a commitment to strengthen the agricultural economy itself in the Borough as an important element of the economy.</p>	<p>It is considered that the first sentence of this Policy provides as much support for the agricultural economy as possible. Further detail would not be suitable as there would be no certainty of delivery.</p>	None.
		<p>Conversion of existing buildings e.g. barns is not sufficient to meet possible future needs for employment facilities. No provision is made for new build rural business parks for example in order to sustain the environmental integrity of the countryside.</p>	<p>The location of new employment should be located in accordance with the Core Strategy Policies 6 and 7 (Settlement Hierarchy and Development Strategy). The urban area should be the main focus for new development, especially as Green Belt coverage forms most of Redditch's rural area. There is however suitable support for conversion for economic purposes in rural areas and scope within the settlement of Astwood Bank for employment redevelopment.</p>	None.
R128	H Pankhurst OBO Natural England	<p>This policy would benefit from clear cross-references to the policies on green infrastructure and the natural environment.</p>	<p>Agree. Policy will be amended to include cross reference to Green Infrastructure Policy and Natural Environment Policy.</p>	<p>Amend Policy to include: <i>“ With regard to impact on the surrounding natural environment</i></p>

				<i>consideration should be had to the potential for protected species (such as bats and barn owls) with particular reference being had to Policy on 'Green Infrastructure' and Policy on 'Natural Environment'.</i> "
		The conversions being promoted here will need to consider the potential for impacts on protected species such as bats and barn owls.	It is considered that this is covered adequately by the Natural Environment Policy and is not suitable for repetition here.	None.
R358	English Heritage	Welcome the consideration of rural economy in this chapter. For this policy the results and outputs of the West Midlands Farmsteads and Landscapes Project are directly relevant and offer an evidence base and tools to help implement the policy (<i>weblink to report provided</i>).	This project has already fed into the development of this policy.	None.
		Welcome the positive approach of the opening paragraph.	Support noted.	Support noted.
		The West Midlands Project and mapping could be used more in the Justification and Policy.	This Study has already influenced this Policy.	None.

		The West Midlands Project has demonstrated that residential use can underplay their economic significance because of home-working and the role of historic farmsteads as serving as bases for limited companies or substantial directorships.	Agreed, residential conversions can also provide economic benefits too however this does not outweigh the need for redevelopment/conversion for economic purposes. However the policy could be amended to state that economic uses could also involve an element of residential where there is justification.	Amend Policy to state: <i>"... impact on road network. Applications for economic uses could also involve an element of residential development where there is justification."</i>
		Prioritising 'employment purposes' over residential conversions may serve to undervalue this contribution to the local economy. There should be consideration of all end uses.	Amend Policy to state that applications for economic uses could also involve an element of residential where there is justification.	Amend Policy to state: <i>"... impact on road network. Applications for economic uses could also involve an element of residential development where there is justification."</i>
		Future change of historic farmsteads should be based on the appraisal of the historic character and significance of the whole site and its sensitivity to the type of change being considered. The project outlines a site assessment framework.	It is considered that this will be implemented through this policy as this policy requires the consideration of impacts on character of the area and farmstead character.	None.
		The broad statement in the Justification identifying 'barns and other farm buildings' is too generalized and could be	Policy will be amended to make clear reference to the Natural Environment Policy, which covers these issues.	Amend Policy to include: <i>" With regard to impact on the surrounding natural</i>

		damaging to conserving the significance of the Boroughs surviving resource of historic farmsteads as well as the wider character of the landscape.		<i>environment consideration should be had to the potential for protected species (such as bats and barn owls) with particular reference being had to the Policy on 'Green Infrastructure' and the Policy on the 'Natural Environment'.</i>
		The policy warrants greater emphasis on change being based upon an understanding of the character, significance and capacity for adaptive reuse of historic farmsteads and their buildings.	These considerations would be integral to the issues considered when determining planning applications.	None.
R378	Worcestershire County Council	Policy should include the consideration of potential affects to biodiversity i.e. protected species (specifically bats and barn owls) when considering proposals for change of use/ re-use or conversion of buildings [see <i>previous representation to Preferred Draft Core Strategy May 2009</i>].	It is considered that this is covered adequately by the Natural Environment Policy and is not suitable for repetition here.	None.

Policy 16 Diversification of the Economy

Rep No.	Name	Summary	Officer Response	Officer Action
R378	Worcestershire County Council	This policy is slightly disjointed. It refers to three separate –albeit overlapping issues – diversification, skills, training and broadband. Whilst it is important for the local labour market to be prepared for new technologies and specialisms and be willing and able to develop relevant, this alone will not enable or support diversification. As such the two issues should perhaps be referred to in separate policies. <i>[One policy might focus on skill training and business-education links to support existing businesses generally as well as feed-in to wider support for diversification. A separate policy would address the broader issue and all angles of diversification]</i>	This policy will be re-drafted in consultation with the Economic Development Team to ensure a clear focus; these comments will feed into this re-draft.	Ensure comments provided are used when re-drafting this policy.

		<p>If Policy 16 remains the same it is important that the role of planning and economic development is supporting diversification should be significantly expanded upon. The policy would benefit from a clearer explanation of exactly what diversification is being encouraged and how it is to be facilitated by the Core Strategy. It is an important issue and there is not enough in the Core Strategy at present to demonstrate how diversification could and will be supported.</p>	<p>This policy will be re-drafted in consultation with the Economic Development Team to ensure a clear focus; these comments will feed into this re-draft.</p>	<p>Ensure comments provided are used when re-drafting this policy.</p>
		<p>Amend Reasoned justification from “...<i>the local economy is not overly exposed to changing economic climates</i>” to: “...<i>local economy is the less vulnerable to changing economic circumstances</i>”.</p> <p>The manufacturing sector includes a range of low value added through to high value added businesses, each with varying degrees of vulnerability. ‘Vulnerable’ is a more accurate term to describe the challenges</p>	<p>Agreed, the policy will be amended to use the term vulnerable rather than expose.</p>	<p>Amend policy to; “...<i>local economy is the less vulnerable to changing economic circumstances</i>”.</p>

		than 'exposed'.		
		'Broad-band' seems to be included as an 'add-on' it is relevant to other matters not just diversification – this could warrant a separate policy.	This policy will be re-drafted in consultation with the Economic Development Team to ensure a clear focus; these comments will feed into this re-draft.	Ensure omens provided are used when re-drafting this policy.

Employment (non-direct policy comments)

Rep No.	Name	Summary	Officer Response	Officer Action
P180	Anderson	Changes need to be made to adjust national targets to the needs of the Borough. The first problem is the continual requirement to keep adding Greenfield industrial and commercial sites without consideration of regeneration going on in designated areas.	The regeneration of sites within employment areas is still essential to the economy of Redditch, however in order to plan up to 2031 additional space for employment uses is required.	None.
		Using land outside boundaries does not meet targets but puts new businesses away from bus routes, increasing demands on land for parking space and reduces the viability of existing bus routes. It often results in	When selecting any sites for development a sustainability appraisal is conducted which compares sites for their sustainability features such as location to public transport and access, this information feeds into	None.

		businesses recruiting from north of the Borough, rather than within the Borough.	decisions on preferred locations.	
		There is a need to recognize that business processes are changing, there need for office space is reducing. New businesses that combine bespoke design and manufacturing are growing meaning that there will be a greater demand for medium sized units.	There is evidence within the Employment Land Review which shows that there is a demand for office space. The emerging plan will provide an employment target and this can be met through a variety of buildings sizes, if there is a demand for medium sized buildings the plan does not prohibit it.	None.
		Due to changing working patterns businesses need to be close to communication hubs and transport hubs. This implies that in the future there will be a much greater demand for mixed development where manufacturing and distribution centres are aligned with office space and living accommodation.	Agreed, it is a priority of the plan to ensure new development is accessible. With regard to mixed use development the emerging plan does not prohibit this.	None.
		We need a different strategy for identifying these future demands, and to rethink the way this new opportunity is brought forward, rather than simply allocating more	The emerging plan contains and range of policies which support and encourage economic development. Allocating new land for employment uses is just one	None.

		green land.	of these policies. It is essential to allocate new land for employment uses to ensure the plan makes provision for development up to 2031 to allow the economy of Redditch to grow.	
R361	Doble	There is an oversupply of office, industrial and retail sites in Redditch. Concern that increasing supply in areas suggested will not attract new firms to Redditch but will relocate existing firms, with the result of empty sites and urban decay.	The vacancy rate for office and industrial accommodation in Redditch is lower than the national average and lower than the optimum amount to allow for market churn, therefore this is not a significant issue in Redditch.	None.
		Concern over retail sites which threaten the viability of the Town Centre and would guard against future retail expansion outside of the core.	There are policies within the Core Strategy (Policy 17 – Town Centre and Retail Hierarchy and Policy 18 – Regeneration for the Town Centre) which seek to ensure that all retail development is located within the Town Centre,	None.
R378	Worcestershire County Council	<u>Creating a Borough where Businesses can Thrive</u> Section would benefit from a more detailed description of the economic development challenges and opportunities faced and how this planning can help create the right conditions to	The introduction provides a broad overview of these things; it is the Council Economic Development Strategy which would provide the detail. This document is referred to in this introductory chapter.	None.

		encourage private sector-led investment and growth.		
		<p><u>Creating a Borough where Businesses can Thrive</u> Should include broad economic challenges and specific issue such as demand, an aging stock of commercial premises, limited availability of land- and how these can impact on economic growth. This would strengthen the reasoned justification sections. This is particularly important as economic conditions will be the driver for future growth and investment – and take-up of employment land.</p>	It is considered that the important key issues are provided within this entire section of the plan.	None.
		Page 46 states “ <i>the Core Strategy seeks to complement this in assisting the delivery of some of the economic priorities</i> ” is this sentence referring to specific priorities or the overall vision of the Economic Development Strategy? If the former, it would be helpful if particular priorities were referred to or explained, for context.	This is referring to delivering some of the economic priorities contained within the Economic Development Strategy.	None.
		There appears to be some contradiction in terms of sectors	All three references made promote a flexible approach. It is	None.

		being encouraged [see full representation for more details].	clear from the text that the Economic Development strategy plays an important role in identifying sectors that are likely to grow in the Borough.	
		The AWM Documents 'Worcestershire Economy: Overview and summary of key issues' (Sep 2010) provides a summary of challenges faced when trying to boost economic performance locally. Some of the issues raised may be useful as context in the Reasoned Justification sections.	The document does not provide any additional detail that would support the policies put forward in the plan although it does provides a good context.	None.
R353	Williamson	Unemployment has steadily increased year on year and from 2004 to date has almost doubled in Redditch.	Evidence provided by Worcestershire County Council does not support this statement (see http://www.worcestershire.gov.uk/cms/community-and-living/research-and-intelligence/economy/monthly-economic-summary.aspx).	None.
		The housing market is depressed, Halifax Building Society forecast further decline in the housing market following the latest 2.8% fall.	Market conditions influence decisions influence the requirement for housing and employment and this will feed into the evidence base supporting the	None.

			emerging plan.	
		Significant increase in property to let as first time buyers struggle to find the £35k average deposit now required.	This is not within the control of planning.	None.
		There is no empirical proof that suggests housing attracts employment rather the converse business attracts individuals. The Core Strategy ignores how new employment is to be attracted to Redditch that is even before empty office space is addressed in the Town Centre and the idle premises on the business parks.	The link between housing and employment is well established at the national level and would not benefit from being repeated.	None.

Policy 17 Town Centre and Retail Hierarchy

Rep No.	Name	Summary	Officer Response	Officer Action
R027	Planning Prospects	This policy and other policies within the core strategy refer to the second tier in the hierarchy of centers as 'district centers'. It is acknowledged within the text that these district centers operates as local centers as defined in PPS 4 however this terminology is persisted with. This should be removed referred to as local centers as it is misleading, incorrect and confusing.	Noted	This issue was raised within the Borough of Redditch Local Plan No.3 inspectors report where the inspector stated the following; 'There is no reason why the term District Centre should not be used for what are in PPS6 terms Local Centres, provided that an adequate explanation is given.' This explanation will be included in the reasoned justification to provide clarity.
R030	WCC Transport	Include reference to an enhanced public realm in support of the objectives. This to include enhanced streetscape, walk and cycle routes, public transport facilities/access routes/information systems and signage. Include reference to these centres being highly accessible, in particular by walk, cycle and public transport.	Officers accept that it would be reasonable to include reference to enhanced public realm within the principles. Planning off levels of off street parking is not deliverable within the Core Strategy	Include reference to enhanced public realm within the principles.

		With appropriate levels of off street parking provided.		
R087	West Mercia Police	WMP broadly support Policy 17, concerned that it doesn't provide a sufficient basis for the council to consider proposals relating to the night time economy. Policy provision does not comply with policy EC4.2 of PPS4. There are already significant levels of concern in Redditch regarding drunken disorder, WMP would not want to see this and related problems worsen during the period covered by the Core Strategy. WMP and HWFRS suggest the insertion of an additional policy into this chapter of the Core Strategy to expand on the statement made in Policy 17 and resolve our concerns.	Policy already makes reference to promoting a vibrant and safe, high quality, evening economy. Officers consider that the Redditch retail policy reflects all relevant aspects of Policy EC4 of PPS4. West Mercia will also be consulted as part of the planning process for comments.	None
R088	Peacock & Smith	The CS document should contain a realistic summary of the need for convenience retail development in the borough, taking account of both qualitative and quantitative considerations. This should be informed by an up to date retail study as required by PPS4	Agreed	The Retail and Office Needs Assessment will be updated this year to inform policy and will include the need for convenience retail taking account of both qualitative and quantitative considerations.

R180	Anderson	<p>The general need for market stalls is reducing with the arrival of low cost stores and car boot sales competing for custom. The general cleanliness is also a cause for concern with discarded boxes, damaged produce and litter all around the stalls.</p> <p>New development around the quadrant is likely to push footfall over to the other side of the Kingfisher Centre as parking opportunities are removed. The need to continue to supply this facility for the next 20 years should be removed from this document. Nothing in the document about the need to increase occupancy of accommodation in and around the town centre</p>	<p>Cleanliness around the market stalls including litter is not a planning issue.</p> <p>Officers consider that the Redditch Market provides a valuable local retail resource appropriate for the Town Centre and it needs to be supported therefore any large scale new development is complimentary to the continuing success of the market.</p> <p>The Town Centre Strategy makes reference to the need for residential accommodation within the Town Centre and this is supported within Policy 18. There is also reference to increasing occupancy of retail within Policy 17.</p>	None
R382	Redditch LSP	<p>Support all policies relating to improving the vibrancy of the Town Centre. 'designing in children and young people' should be included in the list of principles.</p>	<p>Policy is applicable to all members of the public however reference to children and young people will be included in the reasoned justification.</p>	<p>Include reference to children and young people in the reasoned justification</p>

Policy 18 Regeneration for the Town Centre

Rep No.	Name	Summary	Officer Response	Officer Action
R006	Bish	<p>Use the Edward Street Site for a museum or adapt into apartments for housing with the ground floor being used for elderly and disabled accommodation. Extend the original building with a mosaic type historical design.</p> <p>Use Threadneedle House for sheltered housing</p>	<p>The Edward Street Site is currently covered by Policy E(EMP).5 in the Borough of Redditch Local Plan No.3 which states that the site should continue to be used for employment purposes. The Retail and Leisure Needs Assessment recommends retail use on the site only if other named sites in the Town are found unsuitable for retail.</p> <p>Where employment is not economically viable then housing could come forward.</p> <p>Threadneedle House has potential to be used for a variety of town centre uses including residential.</p>	None

R007	Cardew	Q10. Extend into the peripheral zone or beyond the peripheral zone if necessary. Supports Policy 18 particularly to regenerate, encourage city centre renaissance and increase residential accommodation (flats and apartments).	Noted	Extend the Town Centre Boundary to include the peripheral zone.
R008	Rose			
R009	Hughes			
R014	Sport			
	England			
R015	Batty			
R016	Rowell			
R019	Morris			
R020	Baker			
R021	Carpenter			
R022	Clarke			
R023	Phillpotts			
R029	Ostrooumoff			
R036	Bourne			
R037	Bourne			
R038	Smith			
R039	Allen			
R040	Emms			
R042	Best			
R044	Albutt			
R045	Smith			
R046	Lippett			
R049	Haigh			
R050	Haigh			
R051	Haigh			
R052	Haigh			
R054	Mason			
R057	Sinclair			
R061	Homer			
R063	Evans			
R065	Porteous			

R074	Griffiths			
R076	Mason			
R082	Ramsay			
R096	Griffin			
R101	Davies			
R104	Green			
R108	Hawkins			
R010	Barber			
R115	Hayfield			
R116	Smith			
R118	Bartley			
R123	Mills			
R124	Hughes			
R162	Campbell			
R169	Showell			
R172	Heaselgrave			
R176	Styler			
R177	Styler			
R178	Styler			
R122	Carter			
R309	Moxon			
R310	Waldron			
R311	Hatton			
R312	Hatton			
R318	Bonham			
R343	Smith			
R344	Newburn			
R345	Flowers			
R346	Simms			
R347	Cruyton			
R348	Miller			

R349	Rose			
R350	Cale			
R351	Warby			
R352	Warby			
R354	Khoury			
R355	Kloetzli			
R356	Anderson			
R357	Bradshaw			
R380	Jarrett			
R381	Edmunds			
R383	Sinclair			
R384	McQuaid			
R385	McQuaid			
R386	McQuaid			
R387	McQuaid			
R012	Lewis	<p>Q.10 yes extend into the peripheral zone. Redditch town centre is the natural area to enhance the office and retail space. The current travel system centralises in this area and surely is the area that should focus on retail. NOT the outer Brockhill area which is open and not within the natural flow of commerce.</p> <p>Use the town centre to further attract and develop the business infrastructure around the existing transport availability. The courts, police and town hall are situated</p>	<p>Noted</p> <p>Green areas of Brockhill are not related to this question and will not be affected by Town Centre Redevelopment.</p>	<p>Extend the Town Centre Boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority projects and actions.</p>

		in the centre -this should demonstrate the importance of retail and office development suitability that promotes the town. NOT the prominent green areas of Brockhill East.		
R018	Coombes	Q.10 yes supports the policy but try and get architects to use the existing ring road as a one sided open tunnel so that retail can expand above, give it a medieval look with castellated walls so it appears like an old city fortress from a distance.	Implementation of any Town Centre Strategy Proposals will be in keeping and sympathetic to the character of the area, particularly where there are impacts on the conservation area/listed buildings.	None
R024	Theobald	Possibly extend beyond the peripheral zone. Ring road takes up too much land, separates the Town from the hinterland and doesn't deliver much benefit. Parking is an issue and is geared towards the KSC. No short stay parking available. Little provision for daily residents. There used to be both Sainsbury and Tesco shops. When the large supermarkets opened this aspect of the centre closed leaving it a poorer place to visit, live and work.	Breaking down the concrete collar of the ring road as detailed in the Town Centre Strategy and reducing the width of the carriageway will open up land for frontage development and connect the town centre with the hinterland enabling users to access directly into the town centre rather than around it. The Retail Needs Assessment recognises the need for convenience retailing in the form of a supermarket in the Town Centre.	Extend the Town Centre Boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority projects and actions.

R025	Barber	<p>The strategy document doesn't explain what the constraints are or why expanding the town centre makes the situation different. Problem with the town centre is there is nothing of any significance there (e.g. aesthetic, cultural or historic) other than Kingfisher centre. The church is, unfortunately, just a small nondescript building and everything feels like its all part of the entrance to the shopping centre. Add to it the ring road which, whilst very effective for traffic, is a noisy barrier between Redditch town and Redditch suburbs and makes the whole experience of going into Redditch like crossing a city wall, with the Kingfisher centre as the town's castle. It shouldn't be a surprise that everything in the town is subservient to the Kingfisher because that's the way the town centre was designed. Without a focal point to make people really want to come into Redditch for the evening, it is difficult to see how the vision of a vibrant town centre can be achieved in the</p>	<p>The issue with the Town Centre was explained at Issues and Options stage of the Core Strategy.</p> <p>At present there is not enough land to accommodate the retail and office space requirements as evidenced in the Retail Needs Assessment and Office Needs Assessment, therefore there is a need to extend into the peripheral zone, an approach supported by national policy in PPS4. This can be demonstrated in sequential tests for submitted planning applications for Town Centre Uses outside of the Town Centre</p> <p>Breaking down the concrete collar of the ring road as detailed in the Town centre Strategy and reducing the width of the carriageway will open up land for frontage development and connect the town centre with the hinterland enabling users to access directly into the town centre rather than around it.</p>	<p>Extend the Town Centre Boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority projects and actions.</p>
------	--------	---	---	--

		shadow of the mighty Kingfisher centre.		
R027 R034 R035 R100 R105 R119 R120 R121 R106 R202	Planning Prospects Sharp Evans Selves Dewhurst Danks T Styler O Styler Jobson White	Q.10 – No	Noted however the majority of responses received are in agreement with extending the boundary of the town centre into the peripheral zone have given valid reasons.	Extend the Town Centre Boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority projects and actions.
R028	Lynn	Q.10 – No there are several units already empty within the KC. Why do we need more office space - so many empty offices have been vacant for years.	An update of the Retail Needs Assessment will be carried out this year looking at retail requirements and current vacant empty units. An Office Needs Assessment document has already been carried out which demonstrates the need for office space and that current vacant offices are not fit for purpose. This will also be updated in a review of the ELR this year.	Carry out Retail Needs Assessment update. Update Office requirements for the Town Centre.

R030	WCC Transport	Add/change wording in red to the following principle contained in Policy 18 ii promote excellent accessibility by all sustainable transport modes, incorporating any necessary infrastructure and service improvements including those required to ensure efficient operation of public transport	Noted	Amend Policy 18 to include relevant wording.
R041	Patten	Q.10 There is land within the Town Centre ring road on which development can take place, need to be innovative. Consideration should be given to knocking down buildings such as the bus depot and the building behind Smallwood House.	Agreed – comments support the recommendation within the Town Centre Strategy. Sites within the Town Centre have been investigated and will be updated with the Retail Needs Assessment update.	Carry out Retail Needs Assessment update. Progress implementation of Church Rd SPD.
R043	Rixon	Q.10 – yes extend in the peripheral zone – there are areas of the town that can be regenerated giving the whole area a social and economic boost.	Noted	Extend Town Centre boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority projects and actions.
R053	Timothy	Q.10 Extend into the peripheral zone. The Town Centre has a number of constraints preventing	Noted	Extend Town Centre boundary into the peripheral zone.

		the improvements that need to be made to provide new retail and office space. The peripheral zone looks like it would benefit from improved retail/entertainment facilities currently lacking in the Town Centre.		Continue to investigate and implement Town Centre Strategy priority projects and actions.
R055	Wakeman	Q.10 Why should the Town Centre be given preference over previously undeveloped land? However there does seem to be some scope for development in some of the designated peripheral areas	The Town Centre is the preferred location for town centre uses including retail, office leisure and residential as supported by national policy in PPS4. It is not clear from the response whether its referring particularly to housing however it should be noted that there isn't enough previously developed land in the Borough to accommodate the housing target and innovative approaches to the town centre are being investigated.	None
R059	Watkiss	Q.10 Yes extend into the peripheral zone, this area zone includes areas/features which should be considered as part of the town centre e.g. Train Station and retail and could be helped to target improvements to these areas.	Noted	Extend Town Centre boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority projects and actions.

R062	Network Rail	No comments to make	Noted	None
R064	Worcester Diocese	<p>Support the emphasis within the strategy for Town and District Centre Importance. What constitutes a Healthy Centre needs to be included i.e. mixture of uses. Within the TCS the central location and importance of St Stephens Church needs greater prominence.</p> <p>No further mention is made of St. Stephen's as a strategically important building within the town centre than on the intro of the TCS. This does not reflect the considerable input made by Redditch BC officers into the shaping of plans for the building as a community resource at the heart of the town centre, and therefore at the heart of the town and borough. Important to ensure that any buildings to the west of St Stephen's church do not have a negative impact on the church. They should be of appropriate height and appearance. This does not necessarily mean that they should be designed in the</p>	<p>Agreed, mix of uses within the town centre is referenced in principle one of Policy 18.</p> <p>St Stephens Church is located in the conservation area therefore any future development within this area would have to be sympathetic to buildings within the conservation area.</p>	<p>Include reference to St Stephens Church with Church Green Bullet point within Policy 18.</p> <p>None</p>

		same architectural style but all the buildings should compliment each other. The diversification of land use around Church Green is good idea.		
R066	Theatres Trust	Theatres are important anchors in the cultural and creative industries, providing jobs, skills, learning and educational opportunities, and are vital secondary spend to tourism retail and leisure sectors.	Noted	None
R068	Hill	Q.10 yes agrees in principle; make use of all unused redundant sites that are currently available first.	Agreed	Same answer as above
R079	WCC Archaeology	Acknowledgement is required that the town centre is also the historic medieval core of the borough and as such any development proposals should take into account the historic environment.	Agreed	<p>Include reference to the medieval core and requirement for archeological investigations where appropriate within the guiding principles.</p> <p>Link to the Historic Environment Policy within the reasoned justification</p>

R080 R103	S White Smith	Q.10 No extension into the peripheral zone. We already have several shops and business areas that are empty e.g. the old job centre, Barclays, the shop next to Wspoons, old medical centre and several shops in the Kingfisher Centre.	An update of the Retail Needs Assessment will be carried out this year looking at retail requirements and current vacant empty units. An Office Needs Assessment document has already been carried out which demonstrates the need for office space and that current vacant offices are not fit for purpose. The Office needs requirements will be refreshed in the ELR update for 2011.	Carry out Retail Needs Assessment update.
R084	Cunningham	Q.10 No extension into the peripheral zone, there are many empty office developments – large area opp Church Hill McDonalds and Oast House. Redditch has a lot of retail outlets already and doesn't need any more particularly in such close proximity to Solihull and Birmingham.	An update of the Retail Needs Assessment will be carried out this year looking at retail requirements and current vacant empty units. An Office Needs Assessment document has already been carried out which demonstrates the need for office space and that current vacant offices are not fit for purpose. The Office needs requirements will be refreshed in the ELR update for 2011.	Carry out Retail Needs Assessment update.

R087	WMP	<p>Support Policy 18 and its commitments to improved lighting, safety and security in the Town Centre and developments to include safe and well designed buildings and places.</p> <p>As currently worded the policy is consistent with planning guidance.</p>	Noted	None
R109	S Smith	<p>Yes extend into and beyond the peripheral zone. Can see no benefit in development constraints for the Town Centre Area. Varied development for businesses and residential accommodation should be considered.</p>	Agreed	<p>Extend the Town Centre Boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority projects and actions.</p>
R113	Stallard	<p>No. Make sure that all void property is utilised to its full potential before committing to new developments and making full use of refurbished units.</p> <p>One limiting provision in the town is suitable accommodation for societies to hold events at regular intervals and at a reasonable cost.</p>	<p>The policy is aiming to achieve regeneration for the town centre.</p> <p>An update of the Retail Needs Assessment will be carried out this year looking at retail requirements and current vacant empty units.</p> <p>An Office Needs Assessment document has already been carried out which demonstrates</p>	<p>Carry out Retail needs Assessment Update</p>

			the need for office space and that current vacant offices are not fit for purpose. The Office needs requirements will be refreshed in the ELR update for 2011.	
R128	Natural England	Supports this approach and welcomes the recognition of the importance of accessibility.	Noted	None
R173	Coombes	Extend beyond the peripheral zone	Agreed	Extend the Town Centre Boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority projects and actions.
R174	Bedford Smith	Extend to private service sector not only retail but also professional solicitors, banks jobs advisors etc but not estate agents as Redditch is over subscribed. Possibly wholesale distribution, exhibition facility or multi purpose hall or hotel? Retail should be supported by robust modeling with allowance	Agreed, all of the uses referred to are Town Centre Uses. The Updated Retail Needs Assessment will provide robust evidence for retail requirement allowing for internet shopping, similarly to how the previous RNA considered its effects.	Carry out Retail Needs Assessment update.

		for internet shopping		
R188	Pritchard	Regenerate empty business and retail units in the town centre rather than use green belt land. Why are these units currently not being used? Is there a demand for retail, industrial and office units if these are empty?	<p>Agree with comments, policy is aiming to achieve regeneration for the town centre.</p> <p>An update of the Retail Needs Assessment will be carried out this year looking at retail requirements and current vacant empty units.</p> <p>An Office Needs Assessment document has already been carried out which demonstrates the need for office space and that current vacant offices are not fit for purpose. The Office needs requirements will be refreshed in the ELR update for 2011.</p> <p>No land within the Town Centre is designated as Green Belt land.</p>	Carry out Retail Needs Assessment update.
R186 R207 R209 R215 R230 R241 R242	Prewitt Butt F Zaheer Hashid Hussain L Ellis Oakes	Welcome proposals for the Town Centre Area, they are long awaited and will provide a real boost for Redditch and its people.	Noted	Continue to investigate and implement Town Centre Strategy priority projects and actions.

R245	Few			
R247	Smart			
R248	Hudson			
R249	Rani			
R250	Hafiz			
R255	A Gray			
R256	Asif			
R259	Nazir			
R260	Nazir			
R261	Imitiaz			
R262	Gosling			
R263	Tiaz			
R265	Ali			
R269	Hussain			
R270	Hussain			
R272	Hussain			
R273	Barbar			
R274	Zafar			
R276	Zafar			
R277	Zafar			
R285	Akbar			
R286	Akhtar			
R287	Akhtar			
R290	Ashraf			
R291	Ashraf			
R293	Ashraf			
R294	Ashraf			
R297	Mahmood			
R298	Hussain			
R303	Shazia H			
R369	Raza			

R370 R371 R372 R373	Naz Viloh Ali Ahmed			
R314	Rood	Extend the TC boundary and supports the thrust of Policy 18. If reasonable restaurants (not fast food) were clustered around the cinema it could open up as a centre for evening entertainment for a variety of age groups.	Agreed	Extend the Town Centre Boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority projects and actions.
R378	WCC	Suggest that much of the policy be better incorporated in the reason justification.	The RJ includes all necessary detail needed to achieve this important strategy policy.	None
R379	Turleys	No. SWIP support the policies to protect and strengthen the retail role of Redditch and to encourage a wider range of services and facilities. Acknowledges the need to improve linkages within the established town centre and connections to surrounding communities. SWIP supports the principle of identifying a 'Strategic Site' through the linking of existing development opportunity sites.	The Borough Council will continue to work and support the KSC however significant growth and regeneration within the Town Centre is required for the vitality and viability of the centre as evidenced in the retail needs assessment and office needs assessment. Officers consider that this can be achieved within areas referenced without significant impact on existing retail provision within the Town Centre given the scale of need identified, with uses	Carry out Retail Needs Assessment update.

		<p>Concern that the boundary of this Strategic Site which takes in land traditionally outwith the town centre core (north east and south western boundaries). Edward Street must be carefully considered given its separation from the core.</p> <p>The identification of mix of uses on each of the constituent parts of the 'Strategic Site' should not preclude comparable uses being brought forward within the established core e.g. food retail provision. Concern remains that the estimated 30,000sqm (to 2021) and further 20,000sqm (to 2026) overstates retail need within the town. It is vital that the amount of comparison floorspace does not overstretch retailing in Redditch to the detriment of the existing retail core/provision.</p>	<p>complementing each other.</p> <p>Agree with comments regarding the identification of a mix of uses on the site which should not preclude comparable uses being brought forward within the established core. With regards to the estimated provision required this will be revised within the forthcoming Retail Needs Assessment</p>	
R389	Sterry	<p>Yes extend into the peripheral zone. The whole area is a mess and needs improving - approaches from the railway are awful</p>	<p>Agreed</p>	<p>Extend the Town Centre Boundary into the peripheral zone. Continue to investigate and implement Town Centre Strategy priority</p>

				projects and actions.
R390	Blakeway	No – why do we need more retail and office space – so people can spend more and get further into debt and work longer hours? – modern lifestyle doesn't work.	<p>An update of the Retail Needs Assessment will be carried out this year looking at retail requirements and current vacant empty units.</p> <p>An Office Needs Assessment document has already been carried out which demonstrates the need for office space and that current vacant offices are not fit for purpose. The Office needs requirements will be refreshed in the ELR update for 2011.</p>	Carry out Retail Needs Assessment update.

Policy 19 District Centre Redevelopment

Rep No.	Name	Summary	Officer Response	Officer Action
R030	WCC Transport	Amend wording in principle vi; propose a scheme with good accessibility to and from the neighbouring residential areas particularly in terms of walking and cycling and from the wider	Agreed	Include relevant wording within the Policy.

		<p>areas by public transport</p> <p>In order to improve patronage and enhance passing trade to the District Centres consideration needs to be given to the accessibility within and around the District Centre. Opportunities to create passing trade are essential to the success of the redevelopment. The creation of or improvement of accessible and safe walking, cycling and public transport routes and services to and from the District Centre would be required to accompany the redevelopment to improve accessibility.</p>		
R064	Worcester Diocese	<p>In the list of Principles guiding any development of District Centres there is no reference to the provision of green spaces and spaces for relaxation. This should be corrected in recognition of the importance of such spaces for residents' well-being and health.</p>	Noted	<p>Include the provision of green infrastructure within the principles.</p>
R087	WMP	<p>Endorse the commitment in Policy 19 that development of DC should design out crime we</p>	Noted	<p>Recommendations are already included within the principles of Policy</p>

		<p>caution that additional or expanded community safety infrastructure will be needed.</p> <p>Recommend that part (iii) of Policy 19 be amended as follows to resolve our concerns: -</p> <p>'iii. Include safe and well designed building and places supported by appropriate infrastructure and service provision.'</p>		19.
R128	Natural England	<p>Welcome the requirements for sustainable access links and open space provision which should be strategically delivered as part of green infrastructure. Connections to the Arrow Valley Country Park to the east and Local Nature Reserves to the west should be promoted and enhanced.</p>	Noted	<p>Reference to Green infrastructure is already included within the principles of policy 19 however connections to the suggested places will be expanded within the reason justification.</p>
R378	WCC	<p>Part V could be included in a more widely applicable design policy, as this will apply more widely than just to the district centers and would be better considered as part of Policy 23</p>	Noted	<p>Design issues included again in this policy due to the importance of the district centre redevelopment.</p>

		High Quality and Safe Design.		
--	--	-------------------------------	--	--

Policy 20 Health of District Centres

Rep No.	Name	Summary	Officer Response	Officer Action
R064	Worcester Diocese	<p>The breadth of meaning of the word “health” should be reflected in the Strategy</p> <p>The “health” of a community is much more than a healthy balance of uses within a centre so that, during the day time, it is not a collection of closed shops, something that would arise if there were too many fast food outlets. Should be noted that the healthiness of the food provided from such establishments is questionable.</p> <p>People’s health should be looked at equally in 3 dimensions, body mind and spirit. A proliferation of fast food outlets and betting shops for e.g. can reinforce an</p>	<p>Agreed, the policy is aimed at incorporating a mix of uses to ensure the health of the centre and the public that use it. District Centres should provide for the day to day needs of those around it.</p>	None

		unfortunate stereotype. Facilities in each district centre must encourage human and community growth in their fullest sense.		
R382	Redditch LSP	<p>Support the statements made regarding the provision of hot food and take-aways in the District Centres (from a health perspective).</p> <p>Suggest that reference should be made under the principles that children and young people should be designed in to the Centres and that opportunities should be made to develop and foster a sense of community where possible.</p>	Policy is applicable to all members of the public however reference to children and young people will be included in the reasoned justification.	Include reference to children and young people the reasoned justification.

Policy 21 Historic Environment

Rep No.	Name	Summary	Officer Response	Officer Action
R128	Natural England	<p>Support integration of the historic environment into GI and welcome the proposed use of the Historic Environment Strategy to inform the Borough's GI strategy.</p> <p>A GI-led approach to the historic environment can do more than just enhance its amenity value. GI can aid in the conservation of the historic environment, including features as diverse as above and below ground archaeological assets and their setting, ancient woodlands, historic designed landscapes and historic field patterns. For example, green space can be located to preserve archaeology or buffer Scheduled Ancient Monuments, locally important non-designated assets and historic field patterns can be incorporated within a new development, the overall effect being to respect, preserve and work with the historic fabric.</p>	<p>Noted</p> <p>Agreed, the policy and reasoned justification should make reference to the potential for GI to aid in conservation of the historic environment.</p>	<p>None</p> <p>Revise policy/reasoned justification to reflect GI potential to aid in conservation of the historic environment.</p>

R358	English Heritage	<p>Welcome positive approach taken to Borough's historic environment and heritage assets.</p> <p><i>Introductory paragraph:</i> it would be helpful if the short summary on the historic environment incorporates relevant examples from the Borough of each type of heritage asset. This would also help serve to underline the broad definition of the historic environment as set out in PPS5.</p> <p>The policies could also be interpreted to help to support objectives 4 & 6.</p> <p><i>Historic Environment opening paragraph:</i> This paragraph could be made more positive particularly in the context of PPS5 Policy HE3.1 with regard to setting out 'a positive, proactive strategy for the conservation and enjoyment of the historic environment' in the area and its contribution to a range of aspects – as for example outlined in HE3.1 (i)-(v). This list could help to frame the paragraph and extend beyond the reference</p>	<p>Noted</p> <p>It is considered that this type of information would be better located in the Local Portrait as it would provide a context to Redditch's Historic Environment assets.</p> <p>Agreed, the policies to contribute to achieving objectives 4 & 6.</p> <p>Agreed, the paragraph can be made more positive. This change would be subject to review following any relevant details emerging from the National Planning Policy Framework due to be introduced late 2011/early 2012.</p>	<p>None</p> <p>Include examples of heritage assets in the Local Portrait.</p> <p>Include reference to objectives 4 & 6 in introductory paragraph.</p> <p>Revise sentence as suggested.</p>
------	------------------	--	--	--

		<p>to green infrastructure.</p> <p>Concerns regarding the interpretation of the second sentence and the extent to which it accords with PPS5 – in particular its emphasis on the sustainable management of change, which is implicit in the definition of ‘conservation’ given in Annex 2. To achieve this understanding the significance of a heritage asset is key to informing decisions on development proposals (as set out in the development management section of PPS5). Hence reframing the sentence along the lines of managing change in ways which sustain, and where appropriate, enhances the significance of the Borough’s heritage assets will be encouraged – offers a positive basis for the policy.</p> <p><i>Policy 21:</i> Practical application of the HEA can also extend to supporting the aim of conserving, and where appropriate enhancing the Borough’s heritage assets and</p>	<p>Agreed, the sentence can be re-framed along the lines suggested to make the policy more positive.</p> <p>Agreed, greater reference can be made to the application of the Historic Environment Assessment, as suggested. Reference can also be made to</p>	<p>Re-frame sentence.</p> <p>Make changes as suggested.</p>
--	--	---	--	---

		<p>hence warrants further development both in the policy and justification. For example, the HECZ provide a level of information to help inform the determination of development proposals (as well as the design of the strategic sites) together with other important sources such as the County Council's Historic Environment Record and emerging detailed work on the Historic Landscape Characterisation which should continue to be used. We recommend this wider application is clearly recognised in the policy and supporting text as well as the need to consult the other information sources at the earliest stage.</p> <p>We also consider that the policy requires some amendment to accord with PPS5 and its advice on designated heritage assets and their conservation (e.g. HE9) - particularly in terms of a strengthened wording than currently proposed. The general aim of the conserving and, where</p>	<p>HER & HLC in reasoned justification and the need to consult these resources at the earliest stage.</p> <p>Agree reference can be made to PPS5 and designated assets but caution needs to be taken that this is not repetition of its policies. Changes will be made to the local portrait as per comment above. This change would be subject to review following any relevant details emerging from the</p>	<p>Include reference to PPS5 and designated assets in policy/reasoned justification.</p>
--	--	---	--	--

		<p>appropriate, enhancing the Borough's heritage assets is also important to retain to accord with the broad definition of the historic environment and heritage assets set out in PPS5. This perhaps could be further illustrated by setting out in the policy the aspects of the historic environment considered to contribute to the area's distinctive identity and how they will be safeguarded or enhanced. Clear cross-references to PPS5 in the reasoned justification would also be helpful, and care should be taken that the wording of the policy reflects the terminology used in PPS5 and address the issue of harm to and loss of significance of heritage assets, including setting.</p> <p>The positive encouragement to heritage-led regeneration is welcomed. Can other policy linkages be reinforced? (reference to comments on Bordesley Abbey)</p>	<p>National Planning Policy Framework due to be introduced late 2011/early 2012.</p> <p>Both the Historic Environment policy and the Leisure and Tourism policy can be amended to include reference to the potential of the historic environment to provide opportunities for leisure and tourism and to seek associated</p>	<p>Make amendments to Historic Environment and Leisure and Tourism policies to include reference to the potential of the historic environment to provide opportunities for leisure</p>
--	--	--	--	--

		<p>Recommend that the policy wording has full regard to Policy HE1 of PPS5. In particular, we suggest that ‘adaptation’ as well as mitigation is referred to. The last sentence also requires amendment to better reflect PPS5, for example ‘.... <u>will not harm the significance of a heritage asset and its setting</u>’ – this is important in that it widens the policy to other heritage assets other than buildings and incorporates the key principle of the significance of the heritage asset.</p> <p>As part of the policy and justification it may also be appropriate to consider the following in support of strategy for the Borough’s historic environment:</p> <ul style="list-style-type: none"> • How conservation areas and other heritage assets will be managed, including 	<p>enhancements to heritage assets, with particular reference to the Bordesley Abbey.</p> <p>Agreed. Policy can be amended to refer to ‘adaptation’ and the final sentence can be amended as suggested.</p> <p>Whilst these are considered to be important parts of the strategy, these considerations are more appropriately made as part of the delivery strategy, which could include:</p> <ul style="list-style-type: none"> • Review Conservation Area Management Plans as necessary and establish 	<p>and tourism and to seek associated enhancements to heritage assets.</p> <p>Amend policy to make reference to ‘adaptation’ and re-word final sentence to include ‘.... <i>will not harm the significance of a heritage asset and its setting</i>’</p> <p>Complete Delivery Strategy for the Core Strategy.</p>
--	--	--	--	--

		<p>the need for Conservation Area Appraisals and Management Plans and Article 4 Directions;</p> <ul style="list-style-type: none"> • Consideration of how CIL/S106 agreements could contribute towards the enhancement of individual assets or specific historic places – (see Annex); • How the strategy will be delivered, by who and what resources are required 	<p>monitoring to identify trigger for review and programme for implementation;</p> <p>Where there is a direct impact on a heritage asset, the possibility of seeking S106 agreements or CIL contributions for enhancements will be explored.</p> <p>The Delivery Strategy for the Core Strategy will achieve this.</p>	
R378	WCC	<p>There is no mention of the historic designated landscape, historic parks or gardens. Although there are no Registered historic parks or gardens within the Borough, there are at least three unregistered sites of local importance (Norgrove Court, Bentley Park, Sillins Park). Consider a policy to recognise the local importance of these and to afford them some protection. These also form part of an important part of Redditch Borough's green infrastructure network.</p>	<p>This representation requests inclusion of reference to specific sites which may not be considered appropriate for Core Strategy policy. However Redditch Borough Council maintains a schedule of buildings of local interest (Local List). English Heritage's consultation document on Good Practice for Local Listing suggests that the Local List can include more than just buildings, therefore it may be appropriate to consider the suggested sites when the Local List is next reviewed. The Local List Policy can also be amended</p>	<p>Consider unregistered sites of local importance during the next review of the Local List. Amend Local List policy to make provision for monuments, sites, places, areas and landscapes (in accordance with Draft English Heritage Guidance), in addition to buildings, to be added to the Local List.</p>

			to make provision for assets other than buildings to be added to the list.	
--	--	--	--	--

Policy 22 Local List

Rep No.	Name	Summary	Officer Response	Officer Action
R358	English Heritage	Welcome the Borough's commitment to maintain and review a Local List. Broadly welcome the inclusion of the policy in response to this identified local issue. We recommend that the policy content and justification is reviewed against English Heritage latest guidance so that it accords and can draw on this emerging guidance (and particularly sections 1.3) as well as comply with PPS5.	Noted; the draft English Heritage guidance was not available when the policy was drafted.	The reasoned justification will be amended to have regard for the Local Listing guidance. This change would be subject to review following any relevant details emerging from the National Planning Policy Framework due to be introduced late 2011/early 2012.

Policy 23 High Quality and Safe Design

Rep No.	Name	Summary	Officer Response	Officer Action
R030	Worcestershire County Council	Amend bullet point iv. to read: <i>“Aid movement by ensuring all development areas benefit from accessibility, connectivity, permeability and legibility, particularly aiding sustainable modes of movement such as walking, <u>cycling and public transport</u>”</i>	Agreed, policy will be amended to incorporate reference to public transport.	Amend Policy to read, <i>“Aid movement by ensuring all development areas benefit from accessibility, connectivity, permeability and legibility, particularly aiding sustainable modes of movement such as walking, <u>cycling and access to public transport</u>”</i>
		Amend bullet point v. / add bullet point to read: <i>“Encourage use of sustainable modes of transport by incorporating in terms of design and layout best practice for walk, cycle and public transport infrastructure and services. The Worcestershire LTP3 and associated policies and design guides provide information on</i>	It is considered that this is sufficiently addressed already in this policy at Bullet point ii and also through Policy 4 Sustainable Travel and Accessibility.	None.

		<i>best practice.”</i>		
		<p><u>Reasoned Justification</u> Add to Reasoned Justification to read: <i>“The roads are designated according to their intended use and design standard. The main principle of the Redditch road system is to create areas of high environmental quality, high pedestrian and cycle safety <u>and operation of an efficiently and attractive public transport system.</u>”</i></p>	As the policy has been amended to remove reference to the road hierarchy (as this concept has been updated by Manual for Streets 2, this comment is no longer applicable.	None.
		<p>It is suggested that in terms of transport, it would be useful to also reference the design principles set out in the Eco-Town Guidance. This would be particularly applicable to the large ‘Sustainable Urban Extensions’.</p>	The Eco Towns Guidance has been incorporated within this policy, in particular reference will be made to the need for inclusive design.	Amend Policy to read, <i>“To create an attractive, well designed, safe, <u>inclusive</u>, high quality environment all places and spaces in Redditch Borough should contribute positively to the local character of the area through respecting and enhancing the local context.”</i> The Reasoned Justification has been amended to read <i>“Inclusive design ensures access to and the use of the</i>

				<i>environment by all members of a community regardless of age, disability, faith or gender.”</i>
R087	A Morgan OBO West Mercia Police and Hereford & Worcester Fire Service	Consider this policy and supporting text to be outstanding. The standard is such that it will be actively promoted nationally as a model of good practice for design planning policies in core strategies. Policy provides a credible and robust way to continue the ‘Secured by Design’ award scheme.	Support noted.	None
R095	D Charmbury OBO Homes & Communities Agency	Support reference to specific tools such as CABEs Building for Life.	Support noted.	None.
R378	Worcestershire County Council	In the second paragraph of the policy it should be made clear that this policy applies to buildings and spaces. As currently written, the policy refers to both area-wide masterplanning as well as building-specific issues, but the relevance of each will differ, this could be more clearly expressed.	The policy will be amended to make it clear that the policy applies to building-specific issues and also area wide master planning.	Amend Policy to read, <i>“There are nine criteria that have been developed which set the standard quality of development expected in the Redditch, including individual buildings, public and private spaces and wider development</i>

				<i>schemes.”</i>
--	--	--	--	------------------

Policy 24 Leisure and Tourism

Rep No.	Name	Summary	Officer Response	Officer Action
R014	Sport England	<p>It should be noted that some sports can only take place in locations which are not easily accessible to public transport; allowance should be made for this.</p> <p>The development of appropriate Management solutions should be sought to reduce conflict between conservation and sport/recreation uses.</p>	<p>This policy was drafted with regard to the principles of PPG17 which states that in identifying where to locate new areas of open space, sports and recreational facilities, local authorities should promote accessibility by walking, cycling and public transport. However, it is acknowledged that some uses may be restricted by location, therefore the policy wording can be changed to be more flexible.</p> <p>It is considered that the policy wording as drafted provides sufficient protection for the natural environment and should any conflict arise, the natural environment policies provide sufficient guidance.</p>	<p>Amend criterion ii to read: the proposal is located in places that are sustainable and accessible by a choice of transport modes and / or where additional visitor numbers can be accommodated without detriment to the local environment, principally Redditch Town Centre.</p> <p>None</p>
R030	WCC Transport Policy & Strategy Team	Reword criterion ii: the proposal is located in places that are sustainable and accessible by a choice of transport modes and where	Agreed, this would strengthen the protection of existing retail and employment in the Borough.	Amend policy as suggested

		<p>additional visitor numbers can be accommodated without detriment to the local economy and environment, principally Redditch Town Centre.</p> <p>Assessment of transport impacts should follow WCC Transport Assessment Guidance and relevant LTP3 policies.</p>	<p>It is considered that reference to Core Strategy Policy 4 (Sustainable Travel and Accessibility) would be sufficient, where appropriate.</p>	<p>Insert reference to Core Strategy policy 4 (Sustainable Travel and Accessibility) into reasoned justification.</p>
R066	Theatres Trust	<p>Theatres are important anchors in the cultural and creative industries, providing jobs, skills, learning and educational opportunities, and are vital secondary spend to tourism retail and leisure sectors.</p>	<p>Noted</p>	<p>None</p>
R396	Cllr Hall obo Various contributors	<p>Art plays as valuable a role in society as sports participation. It can contribute to the health and well being of individuals. Planners should make arts a priority because it gives local people the opportunity to express themselves and showcase their talents. Arts should be a priority as they reflect and interpret the soul of a town. The loss of arts in society is no less than the loss of the essence of humanity. The arts should be</p>	<p>The importance of the arts to society and the town is noted. RBC supports the arts in various ways including through the role of the Theatre and Arts Development Manager. The Core Strategy does not preclude this work continuing and reference to the arts can be made within this section of the Core Strategy.</p>	<p>Include 'arts' in the second sentence of the introductory chapter of the 'Promoting Redditch's Community Well-being' section.</p>

	<p>supported by RBC as it can offer a wide range of opportunities for people of all ages to experience a range of entertainment.</p> <p>Current provision in Redditch is limited to the Palace Theatre, cinema, village halls, church halls and community rooms which have limited facilities to support arts activities. Many cannot access them and others travel to neighbouring towns and cities for facilities that could and should be provided locally. This should be recognised in the planning priorities of the town as a gap that needs to be addressed.</p> <p>The town centre needs a versatile building that can provide facilities for a range of art forms.</p> <p>The creative industries should be in the strategy as it is a growing sector which has the opportunity to provide jobs. The Arts are essential for building and sustaining a successful community. The Arts bring people</p>	<p>The Core Strategy does not preclude the enhancement of arts provision in Redditch. Core Strategy objective 6 aims to enhance Redditch's cultural opportunities and reference to the arts will be made in the opening paragraph of this section.</p> <p>This would be an appropriate use for the town centre and the Core Strategy would not preclude this.</p> <p>The arts (and creative industries) was not identified as a locally distinctive issue for Redditch during scoping for the Core Strategy. Reference to the arts will be made in the opening paragraph of this section.</p>	<p>Include 'arts' in the second sentence of the introductory chapter of the 'Promoting Redditch's Community Well-being' section.</p> <p>None</p> <p>Include 'arts' in the second sentence of the introductory chapter of the 'Promoting Redditch's Community Well-being' section.</p>
--	---	---	---

		<p>together.</p> <p>Creativity equals holistic growth and development, which is why those with foresight use the arts as the foundation for regeneration and community building. It is unthinkable that a caring Public Sector body, keen to engender a sense of health and well being, pride and ownership in its town, would not consider this as essential to the community it serves and ensure creative thinking was at the essence of the Core Strategy.</p> <p>A well identifiable arts hub is much better than too many multi-use venues which are hard to find. The Palace theatre could form a nexus for such an arts hub, however currently cost is prohibitive, parking is poor and is currently a walk past noisy pubs to get to the bus or train station. A well identifiable arts hub in the town centre would improve the night time vibrancy and feel of safety (i.e. to move away from a drinking culture).</p>	<p>RBC supports the arts in various ways including through the role of the Theatre and Arts Development Manager. The Core Strategy does not preclude this work continuing and referene to the arts will be made in the opening paragraph of this section of the Core Strategy.</p> <p>It is not within the remit of the Core Strategy to affect the costs and parking arrangements of the Palace Theatre. The Core Strategy does not preclude the provision of an arts hub in the Town Centre.</p>	<p>Include 'arts' in the second sentence of the introductory chapter of the 'Promoting Redditch's Community Well-being' section.</p> <p>None</p>
--	--	---	--	--

		Arts events make a town more lively. Artistic aspects such as hanging baskets enhance a town. Arts bring visitors to the town.	Noted.	None
		Include in the list of suitable development an arts centre for the benefit of Redditch residents and to promote tourism under policy 24.	The list of leisure facilities in the reasoned justification of policy 24 is repeated from Planning Policy Statement 4 and is not intended to be an exhaustive list.	None

Policy 25 Abbey Stadium

Rep No.	Name	Summary	Officer Response	Officer Action
R011	McAlinden	Any development will undermine the tranquil environment and intrude upon the privacy of mourners. The type of development suggested is particularly unsuitable for a site adjacent to a cemetery, due to the possibility of anti-social behaviour and vandalism.	The policy requires that proposals do not adversely impact on the adjacent cemetery and crematorium through the use of appropriate landscaping. It is normal practice for the Police Crime Risk Manager to be involved in any planning application of this type and would therefore seek to design out any opportunities for anti-social behaviour or vandalism.	None
R014	Sport England	Consideration should be given to locating some health facilities on the Abbey Stadium ('The Peak' is	There may be scope for ancillary health facilities at the Abbey Stadium however anything of a	None

		<p>a good example).</p> <p>Additional/new sporting facilities should have backing from the appropriate National Governing Body.</p> <p>River Arrow: the development of appropriate management plans should be sought to reduce conflict between conservation and sport/recreation uses. Blanket bans on use of natural features such as the River Arrow should not be the starting point. There are a number of examples where sport and natural environment exist in harmony.</p>	<p>larger scale would be contrary to the aims of Policy 26 (Health Facilities) and Policy 17 (Town Centre and Retail Hierarchy) which guide health facilities to be located in the town and district centres.</p> <p>Noted, however this should be sought by the applicant and is not for inclusion in a Core Strategy policy.</p> <p>The policy does not impose a blanket ban on the use of the River Arrow, but as it is a designated Special Wildlife Site it requires that it is enhanced and protected. Should any conflicts arise, the natural environment policy provides sufficient guidance.</p>	<p>None</p> <p>None</p>
R030	WCC Transport Policy & Strategy Team	Add a new criterion: satisfy the relevant tests required by Planning Policy Statement 4.	Redditch Borough Council will need to be satisfied that the proposed land uses can be delivered in this location in accordance with PPS4. Should any main town centre uses not listed in the policy be proposed a	Carry out a sequential test for the proposed uses on this site.

			sequential test would be required as required by PPS4. This change would be subject to review following any relevant details emerging from the National Planning Policy Framework due to be introduced late 2011/early 2012.	
R094	CPRE	This land is a buffer for the crematorium and Abbey site. CPRE say NO to hotels on this site due to proximity of Abbey Golf Club and Bordesley Lodge Farmhouse. Environmental surveys will be required before any proposal is considered.	Hotels is only one of the possible uses for this site, however it is not clear how the possible uses would have a detrimental effect on the Bordesley Lodge Farmhouse. . An ecological assessment is required as part of the Local Validation Checklist.	None
R126	Environment Agency	Support reference to protecting and enhancing the River Arrow and welcome links to Policies 2 and 3. The reference to PPS25 could be changed to "...an assessment of flood risk should be made in accordance with Policy 3 (Flood Risk and Water Management) and the SFRA Level 1 and 2 (to be completed).	Noted Noted, reference can be made to the SFRA level 1 and 2.	None Include reference to SFRA level 1 and 2 in reasoned justification.
R358	English Heritage	The spatial extent of this site is not clear; a map/illustration would	Noted, a proposals map will be published to show this site.	Publish proposals map with Abbey Stadium site

		<p>be of help.</p> <p>The policy could be broadened to provide an integrated approach to the recreation and leisure opportunities of the River Arrow valley as a whole. This would better reflect the range of attractions and facilities associated with the area and its immediate vicinity, including Bordesley Abbey. Also by addressing them in an integrated way this could serve to help realise future investment and enhancement opportunities since it presents a positive framework for funding bids, such as via the Heritage Lottery Fund.</p> <p>Suggest that the policy title is amended, for example, '<u>Arrow Valley and Abbey Stadium</u>'; and the content of the policy expanded. With regard to this, we have previously commented on the importance of incorporating an explicit reference to protecting the setting of Bordesley Abbey as well as have regards to the archaeological potential of the</p>	<p>The majority of the Abbey Stadium site as was designated through Local Plan No.3 has now received planning permission. A project of this scale has no known financial support and therefore its delivery would be uncertain. This Core Strategy policy covers the teardrop-shaped land to the south of the existing Abbey Stadium. It should be noted that the scale of development that has planning permission and the scale of development envisaged for the teardrop-shaped land is considerably less than was proposed through the Local Plan No.3 policy. Therefore the opportunities to achieve what is suggested through an amended policy are considerably limited and it is not considered appropriate to amend the policy in this way.</p> <p>However, both the Historic Environment policy and the Leisure and Tourism policy can be amended to include reference</p>	<p>safeguarded for leisure uses.</p> <p>Make amendments to Historic Environment and Leisure and Tourism policies to include reference to the potential of the historic environment to provide opportunities for leisure and tourism and to seek associated enhancements to heritage assets.</p>
--	--	---	--	---

		<p>area and other heritage assets (as for example outlined in the relevant Historic Environment Character Zones e.g. 130, 131). Additionally given its current condition status and the opportunities it offers for contributing to the leisure, recreational and cultural use of the wider area we suggest that the policy also seeks to given positive promotion to securing enhancements in the management of the site, its enjoyment, interpretation and access as part of any wider sport and recreational use of the Stadium and river valley. A possible approach could be along the lines of: <i>'conserve and enhance the heritage assets of the Arrow Valley, including Bordesley Abbey and its setting, and realise opportunities for improving the understanding and enjoyment of the historic environment'</i>. In support of this the reasoned justification should be expanded drawing on the useful information given in for this area as part of the Historic</p>	<p>to the potential of the historic environment to provide opportunities for leisure and tourism and to seek associated enhancements to heritage assets, with particular reference to the Bordesley Abbey.</p>	
--	--	--	--	--

		Environment Character Assessment.		
--	--	-----------------------------------	--	--

Policy 26 Health Facilities

Rep No.	Name	Summary	Officer Response	Officer Action
R014	Sport England	Consideration should be given to locating some health facilities on the Abbey Stadium.	There may be scope for ancillary health facilities at the Abbey Stadium however anything of a larger scale this would be contrary to the aims of Policy 26 (Health Facilities) and Policy 17 (Town Centre and Retail Hierarchy) which guide health facilities to be located in the town and district centres.	None
R090	Bigwood obo Secretary of State for Health	The policy should be more flexible and permit other potential locations (other than Town & District Centres and the Alexandra Hospital).	This would be contrary to the aims of Policy 26 (Health Facilities) and Policy 17 (Town Centre and Retail Hierarchy) which guide health facilities to be located in the town and district centres. There are numerous opportunities for a range of types of health facilities through this core strategy with the district centre redevelopment policy and town centre regeneration policy and the	None

			proposed expansion of the town centre into the peripheral zone.	
R319	Worcestershire Acute Hospitals NHS Trust	Support the protection of land within the curtilage of the hospital for health related purposes.	Noted	None
R378	WCC	<p>Suggest that this policy should include a consideration of wider health issues and measures that can be taken to promote health and well being. This may include the provision of good quality well designed open space or public space and the provision of measures to reduce the impacts of future climate change i.e. the urban heat island through the planting of trees or solar orientation and provision of play space for children. Other authorities have considered policies for takeaways to address issues of obesity and poor diet.</p> <p>The issue of health should also be included within other policies throughout the document.</p>	A Health Impact Assessment is being carried out for the Core Strategy. This will aim to ensure that where appropriate policies have a positive impact on the health of residents. This will inform any policy changes before the next draft of Core Strategy.	Complete Health Impact Assessment.

Policy 27 Health

Rep No.	Name	Summary	Officer Response	Officer Action
R014	Sport England	Welcome policy but unclear how this will be achieved in reality.	The aim of the policy is to encourage applicants to consider health issues through their planning application, as described in the introduction to the policy. The reasoned justification includes examples of how the health benefits associated with development can be demonstrated.	None
R091	Tetlow King	Policy is considered overly onerous and a requirement that would be better dealt with through a specific SPD or through a CIL charging schedule, identifying shortfalls in health-related facilities and how such shortfalls are to be remedied. The intrinsic benefits of affordable housing developments, including health, should not require further explanation at application stage. Therefore recommend that affordable housing developments are exempt from this policy.	It is considered that the requirements are not overly onerous and the health benefits of all development can be demonstrated in a relatively simple way. The reasoned justification includes examples of how the health benefits associated with development can be demonstrated. The Strategic Housing Market Assessment (SHMA) for Worcestershire is currently being revised and updated. The SHMA will, amongst other things,	None

		Recommend a policy encouraging the development of a range of housing and care to meet the needs of the elderly (for example, Bromsgrove Draft Core Strategy).	identify the Borough's need for housing for the elderly and will be updated annually. Core Strategy Policy 8: Housing Provision requires that proposed residential schemes will be assessed against the current SHMA requirements.	
R090	Bigwood obo Secretary of State for Health	Welcome health promotion, through good planning and the implementation of appropriate measures, to seek to encourage individuals to take part in sport/exercise.	Noted	None
R378	WCC	<p>This policy could include the need for a Health Impact Assessment for strategic developments.</p> <p>The reasoned justification seems to repeat itself in focusing on walking and cycling in both the second and third sentences as a means of promoting healthy environments.</p> <p>The reasoned justification should also include reference to the Worcestershire Access and</p>	<p>A Health Impact Assessment is being carried out for all Core Strategy policies and proposals and is likely to negate the need for individual assessments.</p> <p>Noted, the wording can be revised to avoid repetition.</p> <p>These references can be inserted into the reasoned justification.</p>	<p>Complete Health Impact Assessment and make any necessary amendments to the policy.</p> <p>Revise reasoned justification to remove repeated reference to walking and cycling.</p> <p>Insert references to Worcestershire Access and Informal Recreation</p>

		Informal Recreation Strategy (AIRS) and ROWIP (Rights of Way Improvement Plan) in appropriate places.		Strategy (AIRS) and ROWIP (Rights of Way Improvement Plan) in reasoned justification.
R382	Obo Redditch LSP	Fully support proposals under 'Promoting Redditch's Community Well Being' in particular Policy 27.	Noted	None

Policy 28 Cemeteries

Rep No.	Name	Summary	Officer Response	Officer Action
R378	WCC	This is an issue not a policy. A policy could be the allocation of land or safeguarding of a site cemetery use.	Redditch Borough Council anticipates that there is a need for a significant land allocation to accommodate a cemetery which will need to be made in the Site Allocations DPD. It would not be appropriate to introduce this issue at the site allocations stage, necessitating its inclusion in the Core Strategy.	None

Policy 29 Brockhill East Strategic Site

Rep No.	Name	Summary	Officer Response	Officer Action
R001	Middleton	Objection to development at Brockhill East:		
R002	Barnett			
R003	Lee			
R012	Lewis	Green Belt Issues:		
R013	Maserati	- There is currently sufficient unused land not within the Green Belt that could be used for housing/ commercial/ employment development	All urban brownfield sites and greenfield sites which are considered suitable and available for housing development have been identified in the SHLAA.	Continue to refresh the SHLAA in order to identify suitable land for housing
R017	Dudley		Furthermore, the SHLAA has had consideration for urban greenfield sites and ADRs. At this point in time, there was insufficient land available to meet the housing target without the inclusion of Green Belt land	
R028	Lynn			
R031	Watson			
R032	White			
R033	Bent			
R034	Sharpe			
R035	Evans			
R041	Patten			
R047	Corbett			
R053	Timothy			
R056	Boyle			
R058	Thomas			
R069	Sutton	- Green Belt at Brockhill East is not required to meet the Core Strategy. There are no Government imposed housing targets for Redditch to meet	The imposed government housing targets for local authorities will cease when the Localism Bill becomes statute and local authorities will be expected to determine locally derived targets for development needs in their area. In the meantime, RBC has a	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to
R070	Sutton			
R071	Wiggett			
R072	Ansell			
R073	Snaddon			
R075	Battle			
R081	Garner			
R097	Merry	- There is no longer the housing requirement within the Redditch catchment area to justify		

Rep No.	Name	Summary	Officer Response	Officer Action
R098	Pitchford	sacrificing Green Belt	duty to facilitate and promote sustainable patterns of development by making suitable land available for development (PPS1, para 5). The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live (PPS3, para 9). In order to underpin these key policy objectives, local planning documents should be informed by a robust evidence base, in particular of housing need and demand (PPS3, para 11). Councils should identify sufficient specific deliverable sites for housing in order to ensure that there is a continuous five year supply of deliverable sites (PPS3, para 57) and identify sufficient land to enable continuous delivery of housing for at least 15 years from the date of adoption, taking account of the level of provision	identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target
R099	Bates			
R100	Selves			
R106	Jobson			
R107	Wardle			
R110	Brown			
R111	Wells			
R163	Reeves			
R165	Vincent			
R166	Chesterton			
R167	Lee			
R168	Mayne			
R170	Brown			
R171	Perry			
R175	Bedford			
R179	Ahmed			
R181	Sparrow			
R182	Weate			
R183	Comelio			
R184	Morton			
R185	Williams			
R186	Prewitt			
R187	Aldwick			
R188	Pritchard			
R189	Bullivant			
R190	Bullivant			
R191	Bullivant			

Rep No.	Name	Summary	Officer Response	Officer Action
R192	Habib		set out in the RSS (PPS3, para 53). In light of the emerging Localism Bill, housing targets still need to be set, albeit locally derived. However, given that the housing target needs to be revisited in light of the emerging Localism Bill, and emerging/imminent evidence to determine the suitability of Webheath ADR and A435 ADR for development, officers will reconsider the need to allocate Green Belt land to meet locally derived development targets. Any target in the region of the current RPDCS target of 3200 dwellings, is likely to necessitate use of Green Belt land within the Borough	
R193	Habib			
R194	Habib			
R195	Habib			
R196	ORielly			
R197	Hirst			
R198	Marks			
R199	Shah			
R200	Turner			
R201	Whitehouse			
R203	Mahmood			
R204	Mahmood			
R205	Hussain			
R206	Bibi			
R207	Butt			
R208	Hussain			
R209	Zateer			
R210	Achtar			
R211	Bowers			
R212	Ali			
R213	Uddin	- What 'exceptional circumstances' exist to warrant building on this land? They have not been demonstrated as there are issues surrounding the suitability of ADRs to meet development needs	PPG2, para 2.6 states that once Green Belt boundaries have been approved, they should be altered only in exceptional circumstances. Any Green Belt alterations will need to satisfy the Secretary of State that the local	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the
R214	Wilkes			
R215	Hashid			
R216	Mukhtar			
R217	Khan			
R218	Shah			
R219	Rehman			

Rep No.	Name	Summary	Officer Response	Officer Action
R220	Hussain		<p>authority has considered opportunities for development within the urban areas contained by and beyond the Green Belt. Redditch's urban area is completely constrained by Green Belt. Officers consider that all 'deliverable' opportunities for development within the urban area have been considered (refer to SHLAA). There is insufficient 'deliverable' land available within the urban area to meet the 3200 dwelling target, which implies the need to reallocate Green Belt land for development. The capacity limitation within Redditch is a position that was widely acknowledged by the WMRA and the RSS Panel throughout the RSS process. Officers presented long standing evidence through the RSS process, stating that development in the south-west Green Belt was unsuitable. This stance was accepted by the WMRA and the Panel, and was</p>	<p>SHLAA in order to identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target</p>
R221	Ahmed			
R222	Younis			
R223	Waheed			
R224	Noble			
R225	Younis			
R226	Younis			
R227	Younis			
R228	Bi			
R229	Mukhtar			
R230	Hussain			
R231	Mahmood			
R232	Mahmood			
R233	Wheate			
R234	Wheate			
R235	Wheate			
R236	Jones			
R237	Morgan			
R238	Shakespere			
R239	Jones			
R240	Lofthouse			
R241	Ellis			
R242	Oakes			
R243	Hussain			
R244	Hadley			
R245	Few			
R246	Henderson			

Rep No.	Name	Summary	Officer Response	Officer Action
R247	Smart		<p>reflected in the decision to guide unaccommodated Redditch related growth beyond Redditch's administrative boundary. Para 3.65 of the WMRSS Phase Two Preferred Option, with respect to Redditch states <i>"With limited development capacity within the town itself, this will require extensions to the urban area, including provision in adjoining Districts (CF3) with implications for Greenbelt."</i> This is further substantiated by the Panel report amendment R8.20 (p.226) which states <i>"Green Belt alterations will be required within Redditch and within Bromsgrove District to meet the housing provision and related development needs arising from Redditch"</i>. Although the development target may alter from that specified in the RSS, if capacity within Redditch's urban area remains an issue in the light of a locally derived target, then the precedent has been set to</p>	
R248	Hudson			
R249	Rani			
R250	Hafiz			
R251	Naseem			
R252	Naseem			
R253	Jehangis			
R254	Hanif			
R255	Gray			
R256	Asif			
R257	Lees			
R259	Nazir			
R260	Nazir			
R261	Imitiaz			
R262	Gosling			
R263	Kousaur			
R264	Imitiaz			
R265	Ali			
R266	Dallaway			
R267	Aziz			
R268	Aziz			
R269	Hussain			
R270	Hussain			
R271	Hussain			
R272	Hussain			
R273	Barber			
R274	Zafar			

Rep No.	Name	Summary	Officer Response	Officer Action
R275	Zafar		justify that exceptional circumstances exist to roll back the northern Green Belt within Redditch	
R276	Zafar			
R277	Zafar			
R278	Zafar			
R279	Latham			
R280	Ahmed	- Contrary to Green Belt policy PPG2 and its objectives (PPG2 para 2.8)	Para 2.8 relates to establishing Green Belt boundaries where none have previously been defined. However, para 2.1 states <i>"The essential characteristic of Green Belts is their permanence. Their protection must be maintained as far as can be seen ahead."</i> Para 2.6 identifies that Green Belt boundaries can be altered if exceptional circumstances can be demonstrated	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target
R281	Nazir			
R282	Bashir			
R283	Bashir			
R284	Bashir			
R285	Akbar			
R286	Akhtar			
R287	Akhtar			
R288	Ashraf			
R289	Ashraf			
R290	Ashraf			
R291	Ashraf			
R292	Ashraf			
R293	Ashraf			
R294	Ashraf			
R295	Iqbal			
R296	Iqbal	- The contravention to PPG2 was also recognised in WYG 2 (Constraints on Development)	Noted. However, WYG's conclusion and recommendation was for an urban extension at Bordesley on Green Belt land in Bromsgrove District which dismisses any contravention to	None
R297	Mahmood			
R298	Hussain			
R299	Qurban			
R300	Nisa			
R301	Bi			

Rep No.	Name	Summary	Officer Response	Officer Action
R302	Jan		PPG2	None
R303	Shazia			
R304	Braich	- The GB boundary in Brockhill	The Redditch Green Belt (and	
R307	Waugh	has always been intended as a	interim Green Belt prior to its	
R308	Beecham	permanent and enduring	formal identification) has been	
R313	Middleton	boundary, by the Council, the	recognised and 'maintained as far	
R315	Dallaway	Planning Inspectorate and	as can be seen ahead' since the	
R317	English	national policy. We note that the	early 1980s. The boundaries have	
R320	King	BORLP3 examination in 2006 set	not been altered on a whim at any	
R321	Hart	the GB boundary as a permanent	available plan review and their	
R322	Gillespie	and enduring GB boundary and	permanence has been respected	
R323	Birse	this proposal is contrary to PPG2	right up to the point where	
R325	Slater	para 2.12. The BORLP3 inspector	exceptional circumstances do	
R326	Dolan	concluded that exceptional	exist. At BORLP3 examination,	
R327	Stevens	circumstances did not exist for the	there were no proposals to roll	
R329	Hancock	GB boundary to be moved in the	back Green Belt boundaries as	
R330	Dawson	Brockhill vicinity. Furthermore he	exceptional circumstances did not	
R331	Downing	stated that its protection must be	exist and sufficient land had been	
R332	Reavey	maintained as far as can be seen	identified to meet the BORLP3	
R333	Betts	ahead. The BORLP3 inspector	development targets.	
R334	Laurent	also concluded that the	Continuation of identified	
R335	Payne	exceptional circumstances	safeguarded land was proposed	
R336	Simpson	needed to justify a change to GB	in order to meet the longer term	
R337	Vranic	boundaries did not exist	growth needs of Redditch. That	
R338	Parsons	- Inspectors report in 2008	point in time has now been	
R339	Parsons	concluded that development on	reached. The Green Belt and	
R340	Parsons	this Green Belt land would be	safeguarded land boundaries	

Rep No.	Name	Summary	Officer Response	Officer Action
R341	Parsons	most inappropriate	have been in place since BORLP2 and have therefore endured well beyond the plan period (1991-2001). This proposal is therefore not contrary to para 2.12	Continue to refresh the SHLAA in order to identify suitable land for housing. Carry out an assessment of the evidence to consider the most appropriate direction for growth on Green Belt land
R342	Stevens	- Inspector previously recommended that the Brockhill East Green Belt boundary be designated as a permanent and defensible boundary		
R353	Williamson			
R359	Davis			
R360	Turner			
R361	Doble			
R362	Ali			
R363	Ali	- The assessment of GB is not sound and it lacks a conclusive evidence base to support it	See comments above regarding exceptional circumstances and SHLAA evidence. The Redditch Green Belt has been the subject of various studies over time, all of which are referenced in the Study of Redditch Green Belt and ADR land (2008). Furthermore, the RSS Panel considered the options for Redditch related growth and determined that Green Belt to the northwest of Redditch offered the most suitable location. The Panel also considered that after northwest Green Belt, cross boundary growth offered the next most suitable location. This supports other RBC evidence that development on the southwest	
R364	Begum			
R365	Akhtar			
R366	Akhtar			
R367	O'Reilly			
R368	Zaman			
R369	Shah			
R370	Naz			
R371	Ullah			
R372	Ali			
R373	Ahmed			
R374	Bi			
R375	Begum			
R376	Azsiz			
R390	Blakeway			
R391	BAG			
R394	McFarlane			
R395	Payne			
R397	Save Brockhill			

Rep No.	Name	Summary	Officer Response	Officer Action
	Green Belt Petition	<ul style="list-style-type: none"> - The RBC GB Study concluded that in relation to the RSS, any development above that of option 1 would be contrary to PPG2 advice - RBC Green Belt review identifies that development should not take place on ridgelines - Brockhill East Green Belt is high quality agricultural land which should be preserved. The majority of the land is grade 2 and 3a 	<p>Green Belt did not offer a suitable solution to Redditch's growth issues</p> <p>This was indeed the case when commenting on the RSS Spatial Options. See comments above regarding exceptional circumstances</p> <p>Noted. This is a matter for the Development Management part of the planning process. However reference to protect ridgelines can be added to policy if development is still required on Brockhill Green Belt</p> <p>The MAFF ALC map identifies only Grade 3 land in the Brockhill area and no sign of Grade 2. MAFF ALC suggests that grade 3a land should be capable of consistently producing moderate to high yields of arable crops. The majority of the land at Brockhill is not farmed for crops, more so,</p>	<p>None</p> <p>Consider additional policy wording to protect prominent ridgelines from development</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- RBC has a very poor record of preserving its Green Belt seeming only too happy to encourage such development which will result in Redditch becoming a concrete and brick wasteland</p> <p>- Proposed development on Green Belt land is totally disproportionate in that very little development is planned to take place elsewhere throughout the Borough</p> <p>- Brockhill has taken more than its fair share of development and</p>	<p>animal grazing. RBC, in its approach to identifying key sites to meet development needs has, in the first instance looked at urban sites (brownfield and greenfield), followed by ADR and edge of town areas. The targets for development have meant that not all needs can be met without consideration of higher quality agricultural land as a last resort</p> <p>Not true. See comments above regarding RBCs record on Green Belt protection</p> <p>All urban brownfield sites and greenfield sites which are considered suitable and available for housing development have been identified in the SHLAA. Furthermore, the SHLAA has had consideration for urban greenfield sites and ADRs. At this point in</p>	<p>None</p> <p>Continue to refresh the SHLAA in order to identify suitable land for housing</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>these sites are the last remaining green belt land within the Brockhill area</p> <p>- Development of this Green Belt land would have a massive impact on the surrounding countryside</p> <p>ADR Issues:</p> <p>- There are alternative sites which are more than sufficient to meet development needs – the existing ADRs have not been fully investigated and should not be ruled out of the Core Strategy</p>	<p>time, there was insufficient land available to meet the housing target without the inclusion of Green Belt land</p> <p>Development in any location on the edge of an urban area will have impacts on the surrounding countryside. SAs identify the most suitable locations in which to build, taking into account a number of factors. Presumption in favour of sustainable development would undoubtedly compromise some environmental issues</p> <p>Based on evidence in the SHLAA, there are insufficient development sites available to meet the target of 3200 dwellings within the Borough without taking consideration of greenfield, ADR and Green Belt land into account</p>	<p>None</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- There are technical issues and a greater level of unknowns and development constraints for bringing Brockhill ADR forward for development. There is no evidence to demonstrate that Brockhill ADR is more suitable for development than other ADRs</p> <p>- BORLP3 provides for a sequential approach under which the existing ADRs were deemed sufficient to meet future development needs. The RPDCS represents a radical and unwarranted departure from this policy and BORLP3 and there is no justification or evidential support for this change</p> <p>- Any development on the Brockhill ADR and IN67 must respect the local landscape and be appropriate for the area. It must provide appropriate GI and protect/exempt the valuable Red Ditch area from any development</p>	<p>No technical issues or constraints have been identified which are contrary to site delivery. The SA exercise indicated that Brockhill was the most sustainable location for development</p> <p>This is not the case. The ADRs were safeguarded to meet possible future longer term development requirements (Policy B(RA).3). However BORLP3 does not indicate that they would be sufficient to meet these needs</p> <p>Noted. The recent planning application on behalf of Persimmon Homes presented a scheme which took sympathetic account of the local landscape. GI forms a comprehensive part of the developers wider master plan</p>	<p>None</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>Ensure reference to GI is clear in policy. Ensure policy refers to no development being identified within the Red Ditch area</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- There should be no remodelling of topography as it will have a negative impact on the countryside</p> <p>- Access to development of the ADR should not be made from the existing Butlers Hill Lane roundabout as it is not adequate to sustain both existing and future development. An independent traffic assessment should be</p>	<p>for the area. No development was proposed within the Red Ditch, other than highway provision. This area is to remain as Primarily Open Space; however as part of the proposed development, it will become publicly accessible. The matter of road development through the Red Ditch area has been resolved through a revised planning application. Policy re-write could specify that no development should take place in the Red Ditch corridor</p> <p>Policy 29 already specifies that excessive remodelling of land should be avoided</p> <p>The roundabout at Butler's Hill Lane is an at grade roundabout designed to take a fifth spur</p>	<p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>carried out to determine an alternative site access</p> <p>Environmental Issues:</p> <ul style="list-style-type: none"> - Topography does not lend itself to additional development due to its hilly nature. Development would have a detrimental visual impact - Impact on Brockhill Wood. Development should avoid Brockhill and Bulters Hill Woods - Ecological Appraisal 2009 identifies hedgerows H1 and H2, bordering the access track to Lowans Hill Farm. These should be protected from removal as they are considered a priority habitat for conservation under UK BAP - 2008 GB Study concluded that 	<p>The whole of Redditch is hilly and development in this location would have no more of a detrimental visual impact than elsewhere in Redditch. Sensitive consideration to topography can be incorporated into any development</p> <p>Brockhill Wood and Butlers Hill Woods do not form part of the Strategic Site</p> <p>Unsure which 2009 Ecological Appraisal is referred to. Partial removal of these hedgerows formed part of the planning application. However their removal was not considered significant enough to warrant refusal of the application</p> <p>The demonstration of exceptional</p>	<p>None</p> <p>None</p> <p>None</p> <p>Progress a housing</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>landscape and ecological factors represented compelling constraints against development which are still applicable and can be used to resist development of GB to meet RSS proposals</p> <p>- High ecological value. Disruption to wildlife habitats. Species in the area include: kestrels, deer, kingfishers, herons, great crested newts, owls, bats, badgers</p> <p>- Area is of extensive high landscape value. Development would be damaging to the local landscape</p> <p>- The area around Red Ditch boasts a prominent landscape with steep topography to the north west. Current and recent development sits well in a bowl but any extension beyond this area and the ADR would be damaging to surrounding</p>	<p>circumstances would supersede this position – see comments above</p> <p>Species surveys would need to be carried out and mitigation measures identified where necessary. Policy could be strengthened to reflect this position</p> <p>With suitable mitigation, aspects of the local landscape deemed to be of value can be retained and enhanced. Development does not necessarily cause damage</p>	<p>target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>Consider additional policy wording to ensure appropriate protection and mitigation for flora and fauna</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>landscape.</p> <ul style="list-style-type: none"> - Road or attenuation pond development is opposed in the Red Ditch area. The 'cone of vision' should be preserved and the commitment be enforced - Parts of the area around Hewell Park, Cladshill and Brockhill Wood were classified as being of high ecological value by WNCT. These zones should be exempt from development - This development would destroy the 'green lung' from the Arrow Valley - Development would limit the amount of open space left in Redditch which needs to be preserved - Land has valuable amenity value 	<p>Necessary infrastructure to support development is essential. Policy changes will be made to protect and enhance the Red Ditch area, which in turn should protect the cone of vision</p> <p>These areas do not form part of the strategic site</p> <p>This site is not connected to the Arrow Valley</p> <p>Publicly accessible open space forms part of any negotiation process for all planning applications and is represented in this policy</p> <p>This land does not represent</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>due to its close proximity to an already large residential area</p> <p>- Lowans Hill is one of Redditch's last remaining ancient sites. It is possibly the highest landmark in the area and could be an asset (such as the Lickey Hills and Waseley Hills where they have a compass point to identify various landmarks)</p>	<p>publicly accessible open space and any use of it for amenity uses currently constitutes trespass</p> <p>Lowan's Hill Farm The farm itself is red brick and of late 18th/early 19th century origin. The farm buildings are arranged in a regular courtyard, separate, but adjacent to the main house. The farmstead is fairly typical of the area, but its survival is not. The historic farmsteads project carried out on behalf of English Heritage for the West Midlands shows an average loss of farmsteads across Worcestershire of 8% (compared to 10% regionally). The expansion of urban areas appears to be the key factor influencing farmstead loss, however, and in Redditch 42% of farmsteads have been lost. Lowan's Hill Farm is characterised as EXT (extant, with little loss since 1900).</p>	<p>Maintain communication lines with Worcestershire Archaeology Unit and make reference to HER in policy re-write</p>

Rep No.	Name	Summary	Officer Response	Officer Action
			<p>Across the West Midlands only 13% of farmsteads are characterised as EXT, making this farm well preserved despite the relative dilapidation of some of the buildings.</p> <p>We would encourage the retention and reuse of the farm buildings if possible, particularly given the significant loss of farm buildings in this area. If a suitable scheme for retention was not possible, we would ask for full recording prior to demolition.</p> <p>Brockhill – the wider landscape In terms of the wider landscape, the majority of the site was blank or modern, but the archaeologists did find a substantial Iron Age enclosure. This was located roughly 250 meters south of the farmhouse. Due to the location of the farm on the ridge, it is possible that further prehistoric remains lie beneath it. In fact the</p>	

Rep No.	Name	Summary	Officer Response	Officer Action
			<p>archaeological potential is good all the way along the ridge and there is a known medieval settlement at the other end near Weight's Lane with a probable mill recorded on the little stream to the east of the railway line. In between the farm and the medieval settlement there are several WWII features. Along the stream to the west of the farm is a water management system, now partially built over by the houses off Brockhill Lane.</p> <p>The archaeological potential of the area is high, but there is nothing known that would prohibit development. We would request a pre-determination evaluation on any planning application to assess the archaeology and potentially advise subsequent mitigation by condition. We might also request the retention of certain boundaries within the development, depending on the</p>	

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- We need to protect good quality farmland for food production</p> <p>Flooding issues:</p> <p>- These would increase with additional development. Issue with existing drainage ponds flooding</p> <p>- SFRA 2008 exposes the flood risk from further development to Brockhill East GB. Batchley Brook is described as being extremely vulnerable to additional rapid run-off as a result of existing new building</p> <p>- RPDCS acknowledges that there are major issues to be addressed with regard to the 'determination of flood risk' but does not explain at what stage in the approval process these major issues would be addressed</p> <p>- Hewell Road (towards Sainsbury's island) already floods on a regular basis. This area</p>	<p>planning application.</p> <p>See comments on p.8</p> <p>A level 2 Strategic Flood Risk Assessment (SFRA) will assess flood risk on the site and suggest mitigation measures where necessary. Policy wording can reflect this if it is identified as an issue. Current evidence does not indicate that flooding issues do not constitute a 'show stopper' to development</p>	<p>None</p> <p>Complete Level 2 SFRA and update of Water Cycle Study. Consider any necessary changes to policy wording</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>would be adversely affected if development took place</p> <p>- Proposed exposed attenuation ponds raise safety concerns</p> <p>- Concerns that increase to the size of the current attenuation ponds will cause flooding to factory units along Hewell Road</p>	<p>Officers understand that the proposed attenuation pond which formed part of the phase 1 Brockhill East application included safety measures to fence off the pond. It is understood that further ponds would be required for a larger development which have not yet been subject to Development Management scrutiny. To ensure this issue is not overlooked, policy wording will be revisited</p> <p>Attenuation ponds have been included to prevent flooding from the development. Officers consider that if the current attenuation pond had not been increased in size and additional ponds planned, there would more likely be a possible issue with flooding</p>	<p>Consider wording in policy to ensure all balancing areas are implemented to adequate safety standards</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- It is clear from the majority of reports that any major development west of the river Arrow will cause/create problems for the disposal of sewerage from the area. Necessary upgrades to the existing drainage system must be implemented to ensure there is enough capacity for the waste water need arising as a result of development. PDCS1 (para 8.18 and 8.19) indicate that the most sustainable solution would be to develop close to, or east of the river Arrow</p> <p>- Infrastructure Reports need consideration before development is considered in this location</p> <p>Transport issues:</p> <p>- Main access roads would become a major thoroughfare</p> <p>- Roads not capable of taking this</p>	<p>Reports referred to are WYG 1 and 2, however, reference to constraints west of the River Arrow are wrong in these reports. Issues of sewage treatment and disposal are more of an issue to the south/ south west of the ridgeline in the vicinity of the A448. Upgrades to the system would come through the application process, which would be no less than any infrastructure provision/ upgrades necessary</p> <p>Officers are awaiting infrastructure reports to support emerging policies</p> <p>The purpose of main access roads is to distribute traffic around the town avoiding residential streets</p> <p>Officers are awaiting</p>	<p>None</p> <p>SRFA evidence to inform policy revision and location of development</p> <p>None</p> <p>Transport Assessment</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>level of increase in traffic</p> <ul style="list-style-type: none"> - Lack of footpaths along Brockhill Drive will make walking unsafe with increased traffic - No pedestrian crossings pose an increased risk for pedestrians <p>- Negative impact on noise and air pollution</p> <p>- Brockhill Lane/ Butlers Hill Lane has for some time been a potential incident black spot due</p>	<p>infrastructure reports to support emerging policies</p> <p>Footpaths along Brockhill Drive were excluded, as with all District Distributor graded roads within Redditch. The purpose of which is to segregate vehicular and pedestrian traffic. However, as planning moves towards more sustainable modes of travel and transport, pedestrian routes need to be considered carefully not only within developments but also links to the wider area. Policy should reflect the wider connectivity for pedestrians</p> <p>A Transport Assessment will be completed which will assess traffic implications of development</p> <p>Development at Brockhill East should not increase traffic volumes at the Brockhill Lane/</p>	<p>evidence to inform policy revision and location of development</p> <p>Consider policy wording to reflect greater pedestrian connectivity</p> <p>Transport Assessment evidence to inform policy revision and location of development</p> <p>No policy implications. Pass concerns over Brockhill Lane/ Butlers</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>to the increased volume and speed of traffic</p> <p>- Rat-run created from Bromsgrove Highway, along Brockhill Drive to Hewell Road is a black spot with poor road layout and vehicle right-of-way onto this now busy route</p> <p>- Hewell Road (swimming baths island) is excessively congested at peak times, made worse by youngsters trying to cross the roads during school opening/closing times</p>	<p>Butlers Hill Lane junction as it would be accessed directly off the nearby roundabout. However the concerns raised will be passed to County Highways for attention to this matter</p> <p>Not a rat-run – classified as a District Distributor route which are designed to facilitate free-flowing traffic around the town with minimal disruption. The only junction that currently suffers from vehicular right of way onto this route is the junction with Batchley Road. It may be possible to negotiate an upgrade for this junction if the Transport Assessment identifies this as an issue</p> <p>A Transport Assessment will be completed which will assess traffic implications of development. The crossing issue will be passed to County Highways for attention to this</p>	<p>Hill Lane junction to County Highways for attention</p> <p>Transport Assessment evidence to inform policy revision and possible junction upgrades</p> <p>Transport Assessment evidence to inform policy revision. Pass crossing issue to County Highways for attention</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<ul style="list-style-type: none"> - Windsor Road takes excessive volumes of traffic which causes congestion problems when the road is subject to road-works from flooding, works to services and potholes. It was never designed to accommodate the volumes of traffic it is now expected to cope with - Proposed rat-run along Weights Lane is surprising. The junction with the A441 is already hazardous - Infrastructure Reports need consideration before development is considered in this location - Adverse weather makes the 	<p>matter</p> <p>A Transport Assessment will be completed which will assess traffic implications of development</p> <p>A through route from Brockhill Drive along Weights Lane to A441 Birmingham Road, would require an at grade roundabout to facilitate appropriate traffic movements. A Transport Assessment will be completed which will assess traffic implications of development</p> <p>A Transport Assessment will be completed which will assess traffic implications of development</p> <p>This is not a planning matter. It</p>	<p>Transport Assessment evidence to inform policy revision</p> <p>Transport Assessment evidence to inform policy revision</p> <p>Transport Assessment evidence to inform policy revision</p> <p>No implications for</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>roads around Brockhill Drive extremely treacherous due to their steep incline</p> <p>- Will the public transport system be improved to serve the new building areas?</p> <p>- The Brockhill Drive/Hewell Road island will have 5 entry roads on a busy junction which has the potential to have a lot of accidents</p> <p>- Developers traffic surveys for Phase 1 of ADR development show that further traffic congestion will occur if flow increases at: Hewell Road Baths, A441, Abbey Retail Park, A441 junction with Dagnell End Road. Traffic would queue from the north heading towards Redditch town centre</p> <p>- More road traffic will occur,</p>	<p>relates to County Highways gritting policy. It can be drawn to their attention</p> <p>Yes. A sustainable travel plan would be expected to accompany all development proposals. This is covered in Policy 4 – Sustainable Travel and Accessibility</p> <p>When this roundabout was built, it was designed as a 5 arm junction with the fifth arm to be constructed at a future date</p> <p>A Transport Assessment will be completed which will assess traffic implications of development</p> <p>A Transport Assessment will be</p>	<p>policy. Report to County Highways for attention</p> <p>None</p> <p>None</p> <p>Transport Assessment evidence to inform policy revision</p> <p>Transport Assessment</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>impacting on the road system locally and in the region</p> <p>- The train infrastructure is limited and busy at peak times. Increased people will put pressure on the rail network</p> <p>Employment Issues:</p> <p>- Large scale Greenfield development around Redditch will not serve the local economy and will not lead to rural regeneration</p> <p>- Brockhill's location is not suitable for office development</p> <p>- Commercial proposal is inappropriate in what is currently only a residential estate. No public transport links for employment proposal will increase road traffic</p> <p>- New industry will generate noise.</p>	<p>completed which will assess traffic implications of development</p> <p>No indication that there will be additional pressure on the rail network, however, Network Rail is proposing to increase train frequency to every 20 minutes</p> <p>Greenfield release is required for employment land and employment provision levels are based on local needs</p> <p>The area within Brockhill identified for employment development was proposed during the preparation of BORLP3. BORLP3 was subject to independent examination and approved for adoption. The Planning Inspector raised no concerns over this allocation of land for employment uses</p> <p>Noise from the Mettis site was a</p>	<p>evidence to inform policy revision</p> <p>Continue to liaise with Network Rail to implement this proposal</p> <p>None</p> <p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>For example, the air hammer at Hewell Road/ Mettis is invasive</p> <p>- No need for additional office/ business units as there are hundreds of thousands of unlet square feet already in Redditch</p>	<p>cause for concern raised by RBC when the Windsor Road Gas Works site was proposed for housing (and refused by RBC). During the application appeal, the Planning Inspector dismissed noise from the Mettis site as a substantial reason for refusal and granted permission. Therefore, on a site located further away from Mettis, this cannot be seen as a strong reason against the development</p> <p>As of 30/6/11 there was 77,859 sq m of industrial space available in the Borough. This represents a void rate of 8%. This void rate has been relatively consistent during the past 4 years. The longest an industrial unit that is currently available has been on our database is since 16/2/07</p> <p>As of 30/6/11 there was 18,073 sq m of office accommodation available in the Borough. This</p>	<p>Consider implications of Employment Land Review and determine a locally derived employment land target for Redditch</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- Proposed building will not bring economy or jobs as volume housebuilders contract from all over the country. Materials are unlikely to be sourced locally</p> <p>Other Planning Policy Issues:</p>	<p>represents a void rate of 16%. This void rate has been relatively consistent during the past 4 years. The longest an office suite that is currently available has been on our database is since 10/1/03</p> <p>There are only 8 office properties that have been available for more than 5 years, no industrial properties have been available for more than 5 years</p> <p>A void rate of c10% is considered optimum for a healthy market and sufficient available properties to generate demand</p> <p>It is beyond Policy Planning control to ensure that local contractors are employed. Planning consent usually refers to locally sourced materials where appropriate</p> <p>Officers are aware that the plan</p>	<p>None</p> <p>Reconsider appropriate</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- PPG 12 (against which this plan was prepared) advises that a period of longer than 15 year from the base date of the plan will be appropriate</p> <p>- Contravenes PPS1 – as development at Brockhill does not ‘protect and enhance the quality, character and amenity value of the countryside and urban area as a whole’. A high level of protection should be given to valued landscapes. The proposal does not ‘seek to maintain and improve the local environment for local communities’</p> <p>- Contravenes PPS9 – As Green Belt, the site is of local importance and proposal does not attach appropriate weight to this in line with PPS9. RBC has not considered the contribution collectively of this site area and features to the landscape and</p>	<p>period needs to reflect an appropriate end date in accordance with PPS3 para 53 and the end date and any associated targets will be amended accordingly in policy</p> <p>RBC has a duty to facilitate and promote sustainable patterns of development by making suitable land available for development (PPS1, para 5). The Government’s key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live</p> <p>Green Belt as an ‘important link to in the unbroken network of natural habitats’ is not one of the five purposes of Green Belt function identified in PPG2. However, Green Infrastructure forms a significant part of policy considerations when identifying</p>	<p>end date for the Plan period</p> <p>Progress a housing target to meet Redditch’s needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing</p> <p>Consider policy wording to strengthen the need to address GI within the site and its immediate environs</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>vicinity. The GB is an important link in the unbroken 'network of natural habitats' which is 'a valuable resource and stepping stone for the migration, dispersal, and genetic exchange of species in the wider environment'. These proposals would break that chain</p> <p>- Pending legislative changes on the horizon which will have an impact on the Core Strategy and more than likely require significant alterations and further consultation</p> <p>Other Issues: - Allocation of GB land is premature given the uncertainty of the housing target</p>	<p>land for development and any scheme would need to adequately address the natural resources within the site. PPS9 supports the integration of natural habitat networks within development (para 12)</p> <p>Agreed. When the Localism Agenda is clear and the National Planning Policy Framework is released, officers will reconsider development targets which are appropriate for Redditch and carry out policy amendments and further consultation</p> <p>Once the SHMA is published and a locally derived housing target can be determined. Green Belt designation will be reconsidered in line with the new housing target</p>	<p>Progress Core Strategy (Local Plan) following legislative changes and carry out further consultation</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<ul style="list-style-type: none"> - This land is inappropriate for both residential and commercial development - Alternative sites have not been fully exhausted - The size of the proposed development is excessive in a plummeting housing market - Houses at Windsor Heights are still for sale - Consider that this area cannot sustain the amount of development proposed - Local infrastructure cannot cope with an increase in homes. Schools, doctors etc are at capacity within the area. There 	<p>See officer comments under 'Green Belt Issues' of this rep</p> <p>Based on evidence in the SHLAA, there are insufficient development sites available to meet the target of 3200 dwellings within the Borough without taking consideration of greenfield, ADR and Green Belt land into account</p> <p>This site is still under construction. The vast majority of homes are now occupied</p> <p>If infrastructure and SFRA evidence suggest that this is the case, then officers will reconsider allocation of this land for development</p> <p>Provision of local community facilities forms an integral part of the strategy site policy. Furthermore, wider provision for</p>	<p>See officer action under 'Green Belt Issues' of this rep</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>None</p> <p>Transport Assessment and SRFA evidence to inform policy revision and location of development</p> <p>Reword policy to link to IDP</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>are limited spaces available at the local first schools, Development of this scale should be placed in an area where there are already suitable community facilities in place</p> <ul style="list-style-type: none"> - There are more viable sites within Redditch, Bromsgrove and Stratford which give a closer relationship between housing and employment - Proposed housing would be better within easy access of Bromsgrove as it has a shortage of affordable housing - Building additional new homes will have a detrimental impact on the sale prices of existing homes in Brockhill - Persimmon should not be 	<p>facilities such as doctors surgeries would form part of the Infrastructure Delivery Plan</p> <p>Based on evidence in the SHLAA, there are insufficient development sites available to meet the target of 3200 dwellings within the Borough without taking consideration of greenfield, ADR and Green Belt land into account</p> <p>Redditch has its own shortage of affordable housing which needs to be addressed</p> <p>Not a planning matter</p> <p>This issue is currently being dealt</p>	<p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>None</p> <p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>allowed to build more houses when most of their roads and lighting etc remain unadopted for several years</p> <ul style="list-style-type: none"> - Building affordable housing is unacceptable - Development will lower the tone and value of the existing estate, chasing away the owners of the larger more affluent houses as the area is no longer exclusive - Increased building will deter residents from staying - Opposed to Persimmon's densely populated developments 	<p>with and beyond planning policy control</p> <p>Redditch has a shortage of affordable housing which should be addressed</p> <p>All new development must meet the Borough's design standards. Development should include a range of types and tenures in order to provide balanced and mixed communities (PPS1). Development such as smaller or affordable homes should not be segregated from the larger, more affluent dwellings</p> <p>Population rates in Redditch have remained fairly static over the last twenty years despite continued building</p> <p>Persimmon's developments are in accordance with the Council's</p>	<p>None</p> <p>Provide housing types and tenures in accordance with emerging SHMA evidence</p> <p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<ul style="list-style-type: none"> - Insufficient space to build an appropriate level/mix of housing, employment and community facilities - Development will create an ugly sprawl, losing natural breaks from other communities - There are lots of power outages around Brockhill, these will increase with more homes - Impact on businesses in Batchley as current 'through traffic' will bypass them through the new estate - It only takes 15 mins to walk to town and much less to walk to 	<p>density policy</p> <p>The level and mix of development and associated facilities will be proportionate to the developable area of the site</p> <p>Unsure what natural breaks from other communities refers to. There are no other communities in this location other than Batchley</p> <p>Evidence indicates that additional development in Redditch would not have a significant impact on the electricity supply in Redditch (WYG1)</p> <p>The response is not clear which businesses would be affected. However, officers do not consider it to be a risk to any existing businesses in this area</p> <p>The Infrastructure Delivery Plan will identify what local and</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p> <p>Continue to refresh the SHLAA in order to</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Batchley so no more shops are required locally – a new shopping area will encourage anti-social behaviour</p> <p>- Persimmons current application suggests building to begin in Autumn 2011, long before the CS has finished being consulted upon and therefore before it is even decided how many houses and where</p>	<p>community facilities are needed to serve the size of development. The design and layout of community facilities will be subject to safe design standards and consultation with Police (as are all planning applications). The Retail Needs Assessment identified a deficiency of services in this location</p> <p>The current application is for development on ADR land. All urban brownfield sites and greenfield sites which are considered suitable and available for housing development have been identified in the SHLAA. Furthermore, the SHLAA has had consideration for urban greenfield sites and ADRs. At this point in time, there was insufficient land available to meet the housing target without the inclusion of ADR land at Brockhill</p>	<p>identify suitable land for housing</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- Brockhill East land has already been sold by the Council to Persimmon. The Core Strategy is clearly about not wanting to fight against Persimmon for fear of financial loss at appeal and about making money from the New Homes Bonus</p> <p>- It is clear that there is no support for development at this site. The Council is obliged to have regard to public opinion. To disregard the force of such opinion would be unconscionable and unconstitutional</p> <p>- WYG (2009 p. 28 & 58) outlined disadvantages for development at</p>	<p>Brockhill East has never been in Council ownership. RBC as local planning authority, presents its best and most sustainable options for development in accordance with the planning policy framework</p> <p>See officer response on p.2</p> <p>It was an intention of the report to identify disadvantages. However,</p>	<p>None</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Brockhill</p> <ul style="list-style-type: none"> - Planners have reacted to pressures from external sources i.e. greedy developers only concerned with profit, not the local area. RBC has given no legitimate reason for this development - The layout is flawed as it represents a repeat of the New Town District Centres – high density central core of social housing which leads to social deprivation and vandalism - More people live in Redditch and work elsewhere. Why should we lose our Green Belt to people who live here but don't work here 	<p>these do not necessarily preclude development of a site</p> <p>See officer response on p.2</p> <p>The concept plans for Brockhill East do not identify the location of affordable dwellings. This comment is unfounded</p> <p>61% of residents work in Redditch, with 11% working elsewhere in Worcestershire and 28% out of the County. On average, people who work outside of the Borough earn less than those who work in the Borough attracting many in-commuters. There is a need to provide more employment</p>	<p>Continue to provide suitable employment opportunities within the Borough to meet our needs</p> <p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- Batchley and Brockhill have the highest unemployment in the Borough. Where will all the extra jobs be for the extra people? If they are not in the same location as the housing then this will impact on traffic congestion</p> <p>- Why is Persimmon the only plan under consideration?</p> <p>- Objection to the developers masterplan as it includes a road through the Red Ditch open space, it fails to provide appropriate levels of GI and open space, It fails to provide an adequate buffer between developments, it fails to protect the cone of vision, it fails to respect the topography of the area</p>	<p>opportunities so that residents can access higher paid jobs in the Borough</p> <p>The population is not set to rise dramatically. The need for additional homes arises from household formation i.e. single households, divorcing families etc. Strategic site policy includes provision for sustainable transport network</p> <p>Persimmon are the landowners</p> <p>These matters are related to the recent planning application. All matters were considered acceptable with the exception of the road through the Red Ditch open space. The Red Ditch issue was resolved through a revised planning application and is not a matter for the Core Strategy. However, a policy re-write could specify that no development</p>	<p>None</p> <p>None</p> <p>Ensure reference to GI is clear in policy. Ensure policy refers to no development being identified within the Red Ditch area</p>

Rep No.	Name	Summary	Officer Response	Officer Action
			should take place in the Red Ditch corridor	
R027	Trebor Devts LLP	Provision of a local centre should be restricted to either Brockhill East or Brockhill West. One in each location is unnecessary and unviable	Robust evidence should determine what local community facilities are required and where. Policy wording could reflect the need for evidence to support application details	Consider policy wording to include reference to supporting evidence for community infrastructure provision
R030	WCC	<p>Suggests the following amendments to the policy (in italics):</p> <p>Brockhill East is located on the north west boundary of the Redditch urban <i>“area and subject to adherence to sustainable design best practice and with appropriate investment in sustainable transport infrastructure, services and Smarter Choices measures”</i> is ideally located to support a significant amount of housing, employment and community facilities.</p>	Agree	Incorporate into policy re-write

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>(iv) be accessible by a choice of modes of transport, incorporating any necessary infrastructure “and service” improvements;</p> <p><i>“(v) Is designed from the outset to maximise use and operational efficiency of walk, cycle, public transport and high occupancy vehicles;</i></p> <p><i>(vi) The development design has:</i></p> <ul style="list-style-type: none"> • <i>Reduced the need to travel (especially by car) to/from the development</i> • <i>Tackled the environmental and economic impact of travel generated by the development</i> • <i>Maximised the accessibility of the development by sustainable transport modes</i> • <i>Developed other measures and plans which assist in influencing travel behaviour (e.g. active and effective and sustainable travel plans, smarter choices measures, real time information systems</i> 	<p>Agree</p> <p>These criteria comments should apply to all new development for Redditch. They would sit better within Policy 4 Sustainable Travel and Accessibility rather than individual strategic site policy</p>	<p>Incorporate into policy re-write</p> <p>Ensure policy relates back to the Sustainable Travel and Accessibility policy. Consider inclusion of the criteria in the Sustainable Travel and Accessibility</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p><i>for passenger transport users etc.)</i></p> <p><i>(vii) Has satisfied the relevant tests required by Planning Policy Statement 4.”</i></p> <p>Reasoned Justification Infrastructure improvements for the site as a whole should be identified in an appropriate Transport Assessment which must “<i>follow Worcestershire County Council Transport Assessment Guidance and relevant LTP3 policies. The Transport Assessment must take account of the impact of the travel demand generated by the development, including on the wider network.</i>” Within the Transport Assessment, details of the installation of an appropriate link road from Weights Lane will need to identify any impacts on Dagnell End junction and the Riverside roundabout in particular,</p>	<p>Agree to refer to relevant national policy</p> <p>This addition is not relevant for this policy as it is covered in the transport policies</p>	<p>Incorporate into policy re-write</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		and mitigation measures will be required to deal with these impacts arising from development. Furthermore, “ <i>the mode shares for walk, cycle and public transport must be maximised and infrastructure, service and Smarter Choices measures put in place</i> ” to reduce car dependency and promote the use “ <i>of walk, cycle and</i> ” public transport in this area based on the findings of the Worcestershire County Council Accessibility Study for Redditch. Any major transport implications arising as a result of development of the strategic site must be mitigated against and this should be informed by a Transport Assessment submitted alongside any planning application	This repeats the wording above, which has been agreed to insert into policy	None
R060	Pulsford	Support for development at Brockhill. No increased flood risk in this area and located close to transport hub	Support noted	None
R064	Paxton	Support for inclusion of community facility provision within	Support noted. Provision of these facilities by developers is detailed	None

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>the policy. It is essential that these facilities are provided and not avoided by developers. However, provision of new facilities should not compromise the viability of existing facilities such as Batchley District Centre</p> <p>School provision should be developed as a multi-use community facility for use by community groups and faith groups for example</p>	<p>in policy and would form part of a legal agreement prior to planning approval. The scale of development demonstrates that additional facilities would be needed in the area. Officers have agreed to refer to national retail policy, which addresses this issue. Up until this point, development that would compromise Batchley District Centre has been resisted, based on the current level of existing development</p> <p>Discussions for delivery of shared school/ community facilities would form part of any planning application preparation. Developer consultation with local groups would be beneficial to achieve what residents want/ need from a facility. This would fit well under the new Localism Agenda and officers would be willing to facilitate such discussions</p>	<p>Not a matter for strategic policy but consider facilitating developer/ community discussions regarding community facility provision at an appropriate stage of development</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		Development on Green Belt land should be mitigated against through the provision of public green space. The provision of private front gardens should be discouraged in favour of public green space	Public open space forms part of the requirements for any development scheme. Green Belt land is still needed to meet the development needs and all its associated (green) infrastructure. A certain amount of private front space is needed for off street parking provision and to discourage density levels that might be perceived as too high, giving the impression of crammed development	None
R069 R070 R075 R081	Sutton Sutton Battle Garner	Object to development at Brockhill with respect to transport issues at Bordesley: <ul style="list-style-type: none"> - A441 is well over capacity especially at peak times - Bordesley bypass should be built before any additional housing - Access to the A441 from Weights Lane is ridiculous. A441 and Weights Lane junction is already dangerous - Combining new general traffic with HGV traffic along Weights Lane is dangerous, especially 	A Transport Assessment will be completed which will assess traffic implications of development	Transport Assessment evidence to inform policy revision

Rep No.	Name	Summary	Officer Response	Officer Action
		given the narrow low railway bridge - A441 frequently experiences flooding without the impact of additional development		
R073	Snaddon	RSS Panel Report 2009 (p.193, paras 8.82-83) notes that the very narrow Green Belt between Birmingham and Redditch has a special natural landscape character	Panel report does not refer to the very narrow Green Belt between Birmingham and Redditch, it refers to the 'more significant gap towards Alevchurch'. Panel also recommends GB alterations within Bromsgrove District. Officers assume that the Panel considered that the need for development outweighs the natural landscape character considerations	None
R087	West Mercia Police	Reiterate previous comments that development in this location would require a new police post	Noted. Consider as part of IDP	Make reference to police provision in IDP
R089	Peterson Spring	Objection to the extensive nature of the proposed development and the geography of the site which may increase the potential flood risk to Heath House, Hewell Road. This property has never flooded. However, larger and	A level 2 Strategic Flood Risk Assessment (SFRA) will assess flood risk on the site and suggest mitigation measures where necessary. Policy wording can reflect this if it is identified as an issue	Complete Level 2 SFRA and update of Water Cycle Study. Consider any necessary changes to policy wording

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>deeper balancing ponds may pose a flood risk which would result in business disruption, equipment damage and stock loss. Insurance costs will rise significantly and may become unobtainable</p> <p>Increase in traffic congestion along Hewell Road will pose a danger for employees at this location</p>	<p>A Transport Assessment will be completed which will assess traffic implications of development</p>	<p>Transport Assessment evidence to inform policy revision</p>
R092	Gallagher Estates Ltd	<p>As currently drafted, the policy infers that the land to the east of the railway is suitable for associated non-residential development i.e. employment and community facilities. We consider that the land east of the railway should be considered to deliver housing development, namely a portion of that considered undeliverable on the A435 and Webheath ADRs in order to contribute towards the RSS target of 4000 dwellings. Approximately 260 additional dwellings can be</p>	<p>This land has been identified in the ELR as suitable to contribute towards meeting the Borough's employment land needs. RBC has a duty to facilitate and promote sustainable patterns of development by making suitable land available for development (PPS1, para 5), not just to meet housing needs. The Council is working towards developing a locally derived, robust evidence base in light of the emerging Localism Bill. A housing target for Redditch will be based on</p>	<p>Progress housing and employment targets to meet Redditch's needs based on the imminent SHMA evidence and ELR</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>accommodated at the strategic site on land to the east of the railway. The policy's current housing target should be increased from 825 to 1085 dwellings. Furthermore, delivery on land to the east of the railway is relatively unconstrained and can be brought forward as an early phase of development in advance of the mix of uses proposed on land to the west of the railway</p> <p>With respect to delivery of IN67, the policy wording should be altered to reflect that this delivery should be explicitly concurrent with other development west of the railway only within the strategic site</p>	<p>emerging SHMA evidence, which is considered an appropriate and robust approach to adopt, whilst the Employment Land Review update will inform employment needs. Housing and employment targets will be revisited when the evidence base is in place</p> <p>Noted</p>	<p>Reword policy criteria to clarify that IN67 development should be delivered concurrently with other development at Brockhill East (west of the railway)</p>
R093	Bruton Knowles	Support Brockhill East strategic site as it represents one of the most sustainable sites for growth	Support noted	None
R094	CPRE	Use of Green Belt for development requires evidence of the exceptional circumstances –	See officer response at R001	See officer actions at R001

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>there is no evidence in the RPDCS</p> <p>Taking away Green Belt in this location opens the gateway to further, greater development and destroys the concept of the Green Belt – to avoid merging of urban growth</p> <p>Object to building on the Green Belt and to the pursuit of new development prior to control of new development in the Core Strategy and establishment of Localism</p>		
R129(A)	Persimmon Homes	<p>Supports the identification of land at Brockhill East as a strategic site for allocation in the CS:</p> <p>- There are compelling exceptional circumstances to alter the Green Belt boundary in this location linked to the need to meet strategic housing and employment land requirements in a sustainable location. The addition of adjoining</p>	<p>Support noted</p> <p>Noted and agreed. However, when SHMA evidence emerges, RBC will revisit the need for reliance on GB land to meet its locally derived targets</p>	<p>None</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Green Belt land is justified through the scale of development now required in Redditch</p> <p>- The ADR land at Brockhill has long been recognised as offering potential for residential development</p> <p>- The objective should be to create a mixed and sustainable community which can best be achieved through comprehensive development including adjoining</p>	<p>All urban brownfield sites and greenfield sites which are considered suitable and available for housing development have been identified in the SHLAA. Furthermore, the SHLAA has had consideration for urban greenfield sites and ADRs. At this point in time, there was insufficient land available to meet the housing target without the inclusion of ADR land at Brockhill</p> <p>Once locally derived evidence is in place to support a housing target for the Borough, the matter of cross boundary development will be dealt with if the target</p>	<p>SHLAA in order to identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target</p> <p>Continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence. Consider</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>land in Bromsgrove District</p> <p>- Reference to the ability for IN67 to be developed through development of Brockhill East should be clarified to explain that IN67 remains unadopted from BORLP3 and now forms part of the Brockhill East Strategic Site. The intention is that phased residential development on the Brockhill ADR land west of the railway will deliver serviced employment land within the adopted IN67 allocation</p> <p>Broadly concurs with most of the 13 specific development principles included in Policy 29 but has some concerns as follows:</p> <p>- The policy should refer to the design of the development being required to enable comprehensive</p>	<p>suggests that Redditch cannot accommodate its evidenced target within the Borough boundary</p> <p>Agree that this wording needs clarification</p> <p>Once locally derived evidence is in place to support a housing target for the Borough, the matter</p>	<p>whether cross boundary growth is an issue once evidence is in place</p> <p>Reword policy criteria to clarify delivery expectations for IN67</p> <p>Progress a housing target to meet Redditch's needs based</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>cross-boundary development in Bromsgrove District which may be allocated through a Bromsgrove CS or other DPD</p> <p>- Principle i – consider rewording to state <i>“incorporate a mix of housing types and provide affordable housing in accordance with current Local Authority policy”</i></p> <p>- Principle ii – should refer to 6.6ha of employment being serviced and made available for Class B1 development concurrently with other phased development rather than referring to IN67. This 6.6ha provision can be appropriately accommodated on the land west of the railway at Brockhill East, broadly reflecting the area of land identified on the adopted BORLP3 Proposals Map</p>	<p>of cross boundary development will be dealt with if the target suggests that Redditch cannot accommodate its evidenced target within the Borough boundary</p> <p>As policies progress, their wording will be considered for sense and grammatical correctness to ensure that they are concise and unambiguous</p> <p>Agree that this wording needs clarification</p>	<p>on the imminent SHMA evidence. Consider whether cross boundary growth is an issue once evidence is in place</p> <p>Consider policy wording for sense and grammatical correctness to ensure that Core Strategy policies are concise and unambiguous</p> <p>Reword policy criteria to clarify delivery expectations for IN67</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- Principle ii – It is not desirable to preclude residential phases from proceeding if there is no immediate development interest in the employment land. The priority must be to deliver housing and to provide serviced (readily available) land for employment use. This principle should be reworded accordingly</p> <p>- Principle iii – objects to restriction of all employment uses within the strategic site to Class B1(a)Office use within IN67. There is no policy justification for this restriction. The topography of the site does not preclude other forms of Class B1 use. The policy should be more flexible and consider all B1 uses, all of which are suitable for inclusion adjoining or within a wider residential area. The capacity of IN67 is significantly greater than the 5000m² floorspace and could be</p>	<p>As above</p> <p>Agree that this wording needs clarification</p>	<p>As above</p> <p>Reword policy criteria to clarify delivery expectations for IN67</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>accommodated within about 40% of the IN67 area. It is not clear from this principle what other employment uses would be accommodated in either IN67 or elsewhere at Brockhill East. This principle and its three criteria are unduly restrictive and require significant amendment</p> <p>Additional employment land can be provided on the area of current ADR land east of the railway and should be the subject of a separate strategic site allocation</p> <p>- Principles iv to vi – Agree with these principles</p> <p>- Principle vii – Development should ensure appropriate foul water drainage measures are in place before the development is occupied. This does not require a development plan policy</p>	<p>Agree that some elements of the policy need to be site specific to land either east or west of the railway line but consider that this is achievable within one strategic site</p> <p>Noted</p> <p>Given the cause for concern regarding previous development and issues with drainage in this vicinity, officers consider that specific attention to this matter in policy is prudent</p>	<p>Consider policy wording to clearly identify the delivery expectations of land to the east and west of the railway line</p> <p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<ul style="list-style-type: none"> - Principles viii and ix – Surface water drainage and assessment of flooding risk are appropriately covered by these principles - Principle x – Support for this principle. It is helpful that the delivery of shared school/ community facilities is stipulated in policy as it avoids the potential for other parties involved in education provision seeking to preclude community use of expensive social infrastructure - Principle xi – Not aware of the GI Concept Statement for Brockhill East. This reference should be deleted and replaced by a reference to the need for a GI strategy for the site. This could be included in an expanded Principle vi - Principle xii – Should be deleted as there will be no residual GB land in Redditch in the Brockhill 	<p>Noted</p> <p>See officer response at R064</p> <p>Policy wording needs to relate directly to GI, either via other CS policy or to the Concept Statement directly. Officers will revisit this wording alongside other policy</p> <p>It could be argued that the current GB boundary is an arbitrary line on the ground and not considered</p>	<p>None</p> <p>See officer action at R064</p> <p>Consider rewording policy to link to GI Statement/ policy</p> <p>Consider removal of this criteria and establishing a</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>East area. Also, there is compelling logic to comprehensive cross-boundary development including land south of Weights Lane</p> <p>- Principle xiii – Should be deleted as it is not necessary as it is implicit in all development plans that their policies should be read as a whole. Policies will only not apply to a site where they are expressly stated not to apply</p> <p>- Reasoned Justification – Strongly supports the demonstration of exceptional circumstances to justify the</p>	<p>defensible. A boundary may be better identified by officers to create the outer boundary of the strategic site rather than included as policy criteria. Once locally derived evidence is in place to support a housing target for the Borough, the matter of cross boundary development will be dealt with if the target suggests that Redditch cannot accommodate its evidenced target within the Borough boundary</p> <p>Noted and agreed</p> <p>Officers consider that inclusion as a strategic site, cross referenced with Policy 7 - Development Strategy would be more</p>	<p>defensible GB boundary in order that a considered and appropriate strategic site boundary can be identified on the Proposals Map</p> <p>Consider removal of this criteria</p> <p>Consider explanation of exceptional circumstances in RJ to Policy 7</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>alteration of the GB boundary. Supporting text should detail the suitability of the site for development and its deliverability</p> <p>Need to reconsider the wording relating to phasing delivery of employment uses within the site and the restriction of land uses. Restricting office floorspace to 5000m² is considered too onerous. No cap on office development should be applied. Separate individual office building units over 100m² within the strategic site outside the IN67 area, where 5000m² of office floorspace has been exceeded within the IN67 land, should be meet the specified criteria with a policy that such individual units should not be combined</p> <p>Reference to open space and green infrastructure should be amended to recognise the topography in parts of the area is</p>	<p>appropriate</p> <p>Noted, see above</p> <p>Agree</p>	<p>See above</p> <p>Consideration to be given to the non-developable areas of the strategic site to</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>a recognised constraint and that the masterplanning of the area should ensure there is an appropriate level of both useable recreation space and amenity space where the topography has been used imaginatively.</p> <p>Support for references to conservation value and protection and retention of important features</p> <p>Agree that a Transport Assessment will be required and that appropriate mitigation should be implemented. A key objective of Persimmon is to seek to reduce traffic demand by providing a choice of modes of travel including bus service routes through the development</p>	<p>Support noted</p> <p>Support noted</p>	<p>ensure their use is appropriate and reflective of the surrounding developed area and enhances the strategic site as whole</p> <p>None</p> <p>None</p>
R164	Davies	This land should only be used when there is a proven and urgent need for land for new housing and employment development	See officer responses at R001	See officer actions at R001

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Future population predictions and thus the need for development on greenfield sites is not reliable. The irrevocable decision to undertake development in this location should not be made until there is conclusive evidence of its necessity</p> <p>Our countryside is a precious, finite and irreplaceable resource. It should not be regarded as an expendable commodity to satisfy the demands of commercial developers</p> <p>In the near future, land in this country may be urgently needed for growing food</p> <p>The Borough of Redditch rightly prides itself on being a green area. RBC planners should have the courage to reject past decisions to extend the town's growth beyond sustainable levels and focus on making the town an</p>	<p>90% of the population lives on 12% of the land. There is sufficient land for agricultural uses</p> <p>See officer responses at R001</p>	<p>None</p> <p>See officer actions at R001</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		attractive area		
R338 R339 R340 R341	Parsons Parsons Parsons Parsons	Question the reliability of the evidence base. The suitability of Brockhill and Webheath for development seems to vary from report to report	The position of suitability of sites alters as further evidence comes to light and the LDF system changes. For example, at one point, guidance said that ADR land within Redditch might not have offered the most suitable locations for growth when the larger cross boundary picture was taken into account. This approach has altered and we're once again looking at land within Redditch's boundaries wholly before (or if) we need to consider cross boundary growth. Furthermore additional evidence will clarify some outstanding matters regarding water and transport issues, particularly in the Webheath area	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and other emerging evidence. Consider whether cross boundary growth is an issue once evidence is in place
R358	English Heritage	Recommend that relevant information is drawn from the Historic Environment Assessment prepared by the County Council and additionally any more detailed and site specific information	See officer response on pp.14-16	See officer action on pp.14-16

Rep No.	Name	Summary	Officer Response	Officer Action
		available from the County Historic Environment Record		
R378	WCC	<p>Consider that topography is an inappropriate assertion to limit employment development to B1(office) in the RJ. Equally, this relates to assertions in paragraph 3 (RJ). Consider this should be reworded to say 'location'</p> <p>Para 3 (RJ) – last sentence not deemed necessary as the previously mentioned GI concept plan adequately considers and incorporates these features</p>	<p>See officer response R129(A)</p> <p>See officer response R129(A)</p>	<p>See officer action R129(A)</p> <p>See officer action R129(A)</p>
R397	Save Brockhill Green Belt Petition	<p><i>“We the undersigned request RBC to abandon these damaging and inappropriate proposals</i></p> <p><i>We also request RBC to preserve and protect the green belt in Redditch and exempt it from any further development”</i></p>	<p>The comments detailed at this rep no. do not reflect the entire case put forward in the Petition. Some points have already been picked up under the main Brockhill rep at R003, starting on p.2. The points listed here represent additional points not previously listed. Officers consider that the entire case presented through the Save Brockhill Green Belt Petition have</p>	

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>The CS refers to the RSS target of 7000 dwellings up to 2026 and maintains that it remains in force until its official replacement by the Localism Bill</p> <p>There has been a change in circumstances since 2006 i.e. economic downturn</p> <p>During 1996-2006, of the 3367 dwellings built, only 20% provided affordable housing, which has created the current need for affordable housing</p>	<p>been picked up appropriately within this table, and those associated with Policies 8 and 30</p> <p>This is the case. The RPDCS proposed a housing target which was considered deliverable within its administrative boundaries whilst the cross boundary issue remained unresolved and a further steer was forthcoming from central government through the Localism Bill</p> <p>Agreed. The SHMA/ AHVA will take account of a full cycle of economic pressures placed on development targets, including both 'boom' and 'bust' scenarios</p> <p>During the 1996-2006 period, the Council did not have a target or a policy to co-ordinate the delivery of affordable housing provision within the Borough. This initiative has emerged through national planning policy over more recent</p>	<p>Continue to progress a development target for Redditch, based on up to date SHMA/ SHLAA evidence as direction from the Localism Act</p> <p>Continue to progress a development target for Redditch, based on up to date SHMA/ SHLAA and AHVA evidence</p> <p>Continue to rely on SHMA and AHVA evidence to determine the affordable housing needs of the Borough</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Due to falling house prices, the Council waiting list should be reevaluated to ensure all of those on the waiting list are still in need before making final decisions on housing targets</p> <p>The CS model for development is 60% private, 40% affordable. Further breakdown shows that for every one affordable dwelling built, there will be 3 private. This ratio could be even greater than 3:1 as some developers believe</p>	<p>years. Following adoption of BORLP3, an SPG was produced to enable delivery of affordable dwellings on sites of 25 units/ 1 ha or more. Further revision to national policy reduced this threshold to sites of 15 units/ 0.5 ha. The SHMA will continue to monitor the level of affordable housing required in the Borough and the AHVA will monitor the viability of its delivery</p> <p>This type of evaluation has formed part of the SHMA evidence base and need has been adjusted accordingly</p> <p>The AHVA tests the appropriate level of affordable housing contribution on private developments. Private developers will not build sites with a higher affordable housing ratio as this affects profit margins and this is</p>	<p>None</p> <p>Continue to determine an appropriate level of affordable housing contribution through the AHVA and consider lowering the threshold in order to maximize</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>this ratio is not high enough. Due to Redditch's land shortage, developers should be requested to reduce the private build percentage to allow more low cost rented social housing</p>	<p>considered an unreasonable request. RSLs are currently not progressing sites for 100% affordable housing due to funding and the economic climate. Sites need to be viable in order for development to come forward</p>	<p>provision</p>
		<p>PPG2 para 2.12 states that any proposals affecting GB should relate to a timescale longer than that adopted for other aspects of the Plan. CS Policy 7 states that all strategic sites (incl. Brockhill E & W) can come forward immediately. These two statements are in conflict</p>	<p>PPG2 is referring to GB boundary alterations, which should be defensible for longer than the Plan period, not the time scale that development should come forward</p>	<p>None</p>
		<p>The points raised in this petition relate solely to the provision of Green Belt land for development and excludes Brockhill ADR</p>	<p>Noted</p>	<p>None</p>
		<p>Allowing Green Belt in Brockhill to be developed would set a planning precedent for all Green Belt land within the Borough.</p>	<p>PPG2/ NPPF will still exist to prevent unnecessary GB development. Given the RSS Panel recommended cross</p>	<p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Further public consultation and involvement should be considered on the issue of Green Belt development, involving local communities as proposed in the Localism Bill</p> <p>Removing Brockhill Green Belt from the CS would not restrict non GB development from taking place. There is sufficient land identified to keep developers busy until a complete resolution of this issue has been reached</p> <p>Under the previous government Coventry, Nuneaton & Bedworth and Warwick councils were facing a similar threat. This threat has been removed at present but one</p>	<p>boundary growth for Redditch, officers consider that the south west GB within the Redditch administrative has been successfully defended against inappropriate urban sprawl. This evidence will continue to be progressed</p> <p>See comment above. There is still some uncertainty surrounding the development targets for Redditch. The RPDCS reflects the most current position at that point in time. Policy progression and additional evidence offers the opportunity to revise emerging policy at an appropriate juncture. The CS must plan for 15 years of development needs beyond its adoption date</p> <p>The decisions taken by other local authorities still need to be evidenced. There is nothing in legislation to suggest that development pressures have</p>	<p>Continue to develop a housing target for Redditch based on emerging SHMA evidence</p> <p>Continue to progress the CS through the appropriate RBC committee process</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>must be vigilant and ensure that councillors abide by the wishes of local people</p> <p>Take note of what the Government are saying</p> <p>This development is totally</p>	<p>disappeared given the need for it to be evidenced. Officers at RBC can only input into the planning system with respect to Redditch related issues. All CS work is scrutinized by Members and progresses through the Executive Committee and Full Council. Therefore, the views of Members are taken into consideration as they have the elective power to approve or dismiss CS consultation</p> <p>The government is pursuing a growth agenda and requires new homes to be built, whilst promoting a Localism agenda. RBC officers are considering emerging evidence to determine an appropriate development target for Redditch, whilst awaiting further advice on the Localism agenda and emerging NPPF</p> <p>Unsure who made this promise.</p>	<p>Continue to develop a housing target for Redditch based on emerging SHMA evidence</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>against the original plans for Brockhill. We were promised this land would never be built on when we bought our house</p> <p>In the words of Carole Gandy, the town must not be concreted over</p>	<p>However, at the time of Brockhill completions, BORLP3 was the adopted local plan and there were no plans to roll back GB further than that released for the original Brockhill designation in BORLP2</p> <p>All CS work is scrutinized by Members and progresses through the Executive Committee and Full Council. Therefore, the views of Members are taken into consideration as they have the elective power to approve or dismiss CS consultation</p>	<p>Continue to progress the CS through the appropriate RBC committee process</p>

Policy 30 Brockhill West Strategic Site

Rep No.	Name	Summary	Officer Response	Officer Action
R003	Lee	Object to development at Brockhill West:		
R017	Dudley			
R025	Barber			
R043	Rixon	Green Belt Issues:		
R053	Timothy	- building on Green Belt should be a last resort not the first option	All urban brownfield sites and greenfield sites which are considered suitable and available for housing development have been identified in the SHLAA. Furthermore, the SHLAA has had consideration for urban greenfield sites and ADRs. At this point in time, there was insufficient land available to meet the housing target without the inclusion of Green Belt land	Continue to refresh the SHLAA in order to identify suitable land for housing
R097	Merry			
R102	Craddock			
R110	Brown			
R163	Reeves			
R165	Vincent			
R167	Lee			
R168	Mayne			
R171	Perry			
R182	Weate			
R183	Comelio			
R184	Morton			
R185	Williams			
R186	Prewitt	- What 'exceptional circumstances' exist to warrant building on this land? They have not been demonstrated as there are issues surrounding the suitability of ADRs to meet development needs	PPG2, para 2.6 states that once Green Belt boundaries have been approved, they should be altered only in exceptional circumstances. Any Green Belt alterations will need to satisfy the Secretary of State that the local authority has considered opportunities for development within the urban areas contained	Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for
R187	Aldwick			
R189	Bullivant			
R190	Bullivant			
R191	Bullivant			
R192	Habib			
R193	Habib			
R194	Habib			
R195	Habib			
R196	OReilly			

Rep No.	Name	Summary	Officer Response	Officer Action
R197	Hirst		<p>by and beyond the Green Belt. Redditch's urban area is completely constrained by Green Belt. Officers consider that all 'deliverable' opportunities for development within the urban area have been considered (refer to SHLAA). There was insufficient 'deliverable' land available within the urban area to meet the 3200 dwelling target, which implies the need to reallocate Green Belt land for development. The capacity limitation within Redditch is a position that was widely acknowledged by the WMRA and the RSS Panel throughout the RSS process. Officers presented long standing evidence through the RSS process, stating that development in the south-west Green Belt was unsuitable. This stance was accepted by the WMRA and the Panel, and was reflected in the decision to guide unaccommodated Redditch related growth beyond Redditch's administrative boundary. Para 3.65 of the WMRSS Phase Two</p>	<p>housing and to justify whether release of Green Belt land is necessary to meet a locally derived target</p>
R198	Marks			
R199	Shah			
R200	Turner			
R201	Whitehouse			
R203	Mahmood			
R204	Mahmood			
R205	Hussain			
R206	Bibi			
R207	Butt			
R208	Hussain			
R209	Zateer			
R210	Achtar			
R211	Bowers			
R212	Ali			
R213	Uddin			
R214	Wilkes			
R215	Hashid			
R216	Mukhtar			
R217	Khan			
R218	Shah			
R219	Rehman			
R220	Hussain			
R221	Ahmed			
R222	Younis			
R223	Waheed			
R224	Noble			
R225	Younis			
R226	Younis			

Rep No.	Name	Summary	Officer Response	Officer Action
R227	Younis		Preferred Option, with respect to Redditch states <i>“With limited development capacity within the town itself, this will require extensions to the urban area, including provision in adjoining Districts (CF3) with implications for Greenbelt.”</i> This is further substantiated by the Panel report amendment R8.20 (p.226) which states <i>“Green Belt alterations will be required within Redditch and within Bromsgrove District to meet the housing provision and related development needs arising from Redditch”</i> . Although the development target may alter from that specified in the RSS, if capacity within Redditch’s urban area remains an issue in the light of a locally derived target, then the precedent has been set to justify that exceptional circumstances exist to roll back the northern Green Belt within Redditch	
R228	Bi			
R229	Mukhtar			
R230	Hussain			
R231	Mahmood			
R232	Mahmood			
R233	Wheate			
R234	Wheate			
R235	Wheate			
R236	Jones			
R237	Morgan			
R23	Shakespere			
R239	Jones			
R240	Lofthouse			
R241	Ellis			
R242	Oakes			
R243	Hussain			
R244	Hadley			
R245	Few			
R246	Henderson			
R247	Smart			
R248	Hudson			
R249	Rani			
R250	Hafiz			
R251	Naseem			
R252	Naseem			
R253	Jehangis			
R254	Hanif	- Contrary to Green Belt policy	Para 2.8 relates to establishing	Progress a housing
R255	Gray	PPG2 and its objectives (PPG2)	Green Belt boundaries where	target to meet

Rep No.	Name	Summary	Officer Response	Officer Action
R256	Asif	para 2.8)	none have previously been defined. However, para 2.1 states <i>"The essential characteristic of Green Belts is their permanence. Their protection must be maintained as far as can be seen ahead."</i> Para 2.6 identifies that Green Belt boundaries can be altered if exceptional circumstances can be demonstrated	Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target
R257	Lees			
R258	Harvey			
R259	Nazir			
R260	Nazir			
R261	Imitiaz			
R262	Gosling			
R263	Kousaur			
R264	Imitiaz			
R265	Ali			
R267	Aziz			
R268	Aziz			
R269	Hussain			
R270	Hussain			
R271	Hussain	- The contravention to PPG2 was also recognised in WYG 2 (Constraints on Development)	Noted. However, WYG's conclusion and recommendation was for an urban extension at Bordesley on Green Belt land in Bromsgrove District which dismisses any contravention to PPG2	None
R272	Hussain			
R273	Barber			
R274	Zafar			
R275	Zafar			
R276	Zafar			
R277	Zafar			
R278	Zafar	- The GB boundary in Brockhill has always been intended as a permanent and enduring boundary, by the Council, the Planning Inspectorate and national policy. We note that the BORLP3 examination in 2006 set	The Redditch Green Belt (and interim Green Belt prior to its formal identification) has been recognised and 'maintained as far as can be seen ahead' since the early 1980s. The boundaries have not been altered on a whim at any	None
R279	Latham			
R280	Ahmed			
R281	Nazir			
R282	Bashir			
R283	Bashir			
R284	Bashir			
R285	Akbar			

Rep No.	Name	Summary	Officer Response	Officer Action
R286	Akhtar	the GB boundary as a permanent	available plan review and their	
R287	Akhtar	and enduring GB boundary and	permanence has been respected	
R288	Ashraf	this proposal is contrary to PPG2	right up to the point where	
R289	Ashraf	para 2.12	exceptional circumstances do	
R290	Ashraf	- Inspectors report in 2008	exist. At BORLP3 examination,	
R291	Ashraf	concluded that development on	there were no proposals to roll	
R292	Ashraf	this Green Belt land would be	back Green Belt boundaries as	
R293	Ashraf	most inappropriate	exceptional circumstances did not	
R294	Ashraf	- Inspector previously	exist and sufficient land had been	
R295	Iqbal	recommended that the Brockhill	identified to meet the BORLP3	
R296	Iqbal	Green Belt boundary be	development targets.	
R297	Mahmood	designated as a permanent and	Continuation of identified	
R298	Hussain	defensible boundary	safeguarded land was proposed	
R299	Qurban		in order to meet the longer term	
R300	Nisa		growth needs of Redditch. That	
R301	Bi		point in time has now been	
R302	Jan		reached. The Green Belt and	
R303	Shazia		safeguarded land boundaries	
R304	Braich		have been in place since	
R306	Moss		BORLP2 and have therefore	
R307	Waugh		endured well beyond the plan	
R313	Middleton		period (1991-2001). This proposal	
R317	English		is therefore not contrary to para	
R320	King		2.12	
R325	Slater			
R326	Dolan	- The assessment of GB is not	See comments above regarding	Continue to refresh the
R327	Stevens	sound and it lacks a conclusive	exceptional circumstances and	SHLAA in order to
R328	Townsend	evidence base to support it	SHLAA evidence. The Redditch	identify suitable land for
R329	Hancock		Green Belt has been the subject	housing.

Rep No.	Name	Summary	Officer Response	Officer Action
R333	Betts		of various studies over time, all of which are referenced in the Study of Redditch Green Belt and ADR land (2008). Furthermore, the RSS Panel considered the options for Redditch related growth and determined that Green Belt to the northwest of Redditch offered the most suitable location. The Panel also considered that after northwest Green Belt, cross boundary growth offered the next most suitable location. This supports other RBC evidence that development on the southwest Green Belt did not offer a suitable solution to Redditch's growth issues	
R334	Laurent			
R335	Payne			
R337	Vranic			
R359	Davis			
R360	Turner			
R361	Doble			
R362	Ali			
R363	Ali			
R364	Begum			
R365	Akhtar			
R366	Akhtar			
R367	O'Reilly			
R368	Zaman			
R369	Shah			
R370	Naz			
R371	Ullah			
R372	Ali			
R373	Ahmed			
R374	Bi			
R375	Begum	- The RBC GB Study concluded that in relation to the RSS, any development above that of option 1 would be contrary to PPG2 advice	This was indeed the case when commenting on the RSS Spatial Options. See comments above regarding exceptional circumstances	Carry out an assessment of the evidence to support protection of south – west Green Belt
R376	Azsiz			
R390	Blakeway			
R391	BAG			
R395	Payne			
R397	Save Brockhill Green Belt Petition	- RBC has a very poor record of preserving its Green Belt seeming only too happy to encourage such	Not true. See comments above regarding RBCs record on Green Belt protection	None

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>development which will result in Redditch becoming a concrete and brick wasteland</p> <p>- Land around Brockhill is agricultural land and should be protected through special status. The majority of the land is grade 2 and 3a</p> <p>- Proposed development on Green Belt land is totally disproportionate in that very little development is planned to take</p>	<p>The MAFF ALC map identifies only Grade 3 land in the Brockhill area and no sign of Grade 2. MAFF ALC suggests that grade 3a land should be capable of consistently producing moderate to high yields of arable crops. The majority of the land at Brockhill is not farmed for crops, more so, animal grazing. RBC, in its approach to identifying key sites to meet development needs has, in the first instance looked at urban sites (brownfield and greenfield), followed by ADR and edge of town areas. The targets for development have meant that not all needs can be met without consideration of higher quality agricultural land as a last resort</p> <p>All urban brownfield sites and greenfield sites which are considered suitable and available for housing development have</p>	<p>None</p> <p>None</p> <p>Continue to refresh the SHLAA in order to identify suitable land for housing</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>place elsewhere throughout the Borough</p> <ul style="list-style-type: none"> - Brockhill has taken more than its fair share of development and these sites are the last remaining green belt land within the Brockhill area - RBCs Green Belt Study states that there are numerous reasons why further development of this land should be avoided - Development here would blight the skyline and obliterate the sense of place for which no amount of green infrastructure can compensate <p>ADR Issues:</p> <ul style="list-style-type: none"> - There are alternative sites which are more than sufficient to meet 	<p>been identified in the SHLAA. Furthermore, the SHLAA has had consideration for urban greenfield sites and ADRs. At this point in time, there was insufficient land available to meet the housing target without the inclusion of Green Belt land</p> <p>The GB Study is essentially a literature review which puts all previous comments regarding all GB and ADR land in Redditch in one comprehensive place for ease of reference. Up until this point Redditch has been able to meet its development needs without reconsidering the use of its ADR and GB land. The Council will have to be satisfied, at the point of submission of the CS that defensible boundaries can be established for 'as far as can be seen ahead' in accordance with PPG2. See also officer response on pp.2-5</p> <p>Based on evidence in the SHLAA, there are insufficient development</p>	<p>None</p> <p>Progress a housing target to meet</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>development needs – these existing ADRs have not been fully investigated and should not be ruled out of the Core Strategy. If ADRs are not capable of development then they should be de-classified</p> <p>- BORLP3 provides for a sequential approach under which the existing ADRs were deemed sufficient to meet future development needs. The RPDCS represents a radical and unwarranted departure from this policy and BORLP3 and there is no justification or evidential support for this change</p> <p>Environmental Issues:</p> <p>- Area is of extensive high landscape value. Destruction of existing rural environment and detrimental to the quality of Redditch's landscape</p> <p>- There are sand and gravel deposits in this area</p>	<p>sites available to meet the target of 3200 dwellings within the Borough without taking consideration of greenfield, ADR and Green Belt land into account. Additional evidence has been commissioned to inform the delivery status of Webheath ADR</p> <p>This is not the case. The ADRs were safeguarded to meet possible future longer term development requirements (Policy B(RA).3). However BORLP3 does not indicate that they would be sufficient to meet these needs</p> <p>See officer response on pp2-5</p> <p>This has been confirmed by WCC and requires further investigation</p>	<p>Redditch's needs based on the imminent SHMA and other evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>None</p> <p>Needs further investigation with Inland</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<ul style="list-style-type: none"> - Biodiversity issues. This area provides wildlife access between Brockhill Wood and Foxlydiate/ Pitcheroak Woods - High ecological value. Disruption to wildlife habitats. Species in the area include: kestrels, deer, kingfishers, herons, great crested newts, owls, bats, badgers, foxes, hedgehogs, stoats, frogs, toads, buzzards, sparrow hawks, greenfinch, bullfinch, yellow hammer, black redstart pied and grey wagtail 	<p>Species surveys would need to be carried out and mitigation measures identified where necessary. Policy could be strengthened to reflect this position</p>	<p>Revenues Minerals Valuer to inform safeguarding issues relating to this site</p> <p>Consider additional policy wording to ensure appropriate protection and mitigation for flora and fauna</p>
		<ul style="list-style-type: none"> - Parts of the area around Hewell Park , Cladshill and Brockhill Wood were classified as being of high ecological value by WNCT. These zones should be exempt from development 	<p>These areas do not form part of the strategic site</p>	<p>None</p>
		<ul style="list-style-type: none"> - Minimal impact on Foxlydiate 	<p>Foxlydiate Wood does not form</p>	<p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Wood is needed</p> <ul style="list-style-type: none"> - Development at Brockhill West is contradictory to The Green Strategy for Redditch. Open space is a unique feature of Redditch as a former New town; Redditch has an abundance of green buffers and tree lined highways which give the urban area a rural feel - Impact on Hewell Grange conservation area - This is the last bit of open space in Brockhill/ Batchley. The area would be better designated as parkland - Land has valuable amenity value due to its close proximity to an already large residential area - loss of recreational space i.e. for dog walking 	<p>part of the strategic site</p> <p>See officer response on pp2-5</p> <p>Policy may need to be reworded to ensure adequate regard is paid to the setting of the conservation area</p> <p>Development schemes would make full provision for publicly accessible open space facilities in accordance with Redditch's open space needs/ standards. This land is not publicly accessible</p> <p>This land does not represent publicly accessible open space and any use of it for amenity uses currently constitutes trespass</p>	<p>None</p> <p>Reword policy to take account of the Hewell Grange conservation area</p> <p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Flooding issues:</p> <ul style="list-style-type: none"> - Currently serious flooding problems in the Batchley area - Field behind Parklands Close is a natural soak away - Increased flood risk - SFRA (2008) identifies Brockhill West as vulnerable to flooding - There is no drainage provision and the area is some distance from sewerage network - Drainage will be difficult. The area is in the vicinity of historic gravel pits not suited to further development - Topography at Brockhill West is likely to have an influence on increased flooding to Batchley - It is clear from the majority of reports that any major development west of the river Arrow will cause/create problems for the disposal of sewerage from the area. Necessary upgrades to the existing drainage system must be implemented to ensure there is enough capacity for the waste 	<p>A level 2 Strategic Flood Risk Assessment (SFRA) will assess flood risk on the site and suggest mitigation measures where necessary. Policy wording can reflect this if it is identified as an issue. Current evidence does not indicate that flooding issues do not constitute a 'show stopper' to development</p>	<p>Complete Level 2 SFRA and update of Water Cycle Study. Consider any necessary changes to policy wording</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>water need arising as a result of development. PDCS1 (para 8.18 and 8.19) indicate that the most sustainable solution would be to develop close to, or east of the river Arrow</p> <p>Transport issues:</p> <ul style="list-style-type: none"> - Main access roads would become a major thoroughfare - Rat-run created from Bromsgrove Highway, along Brockhill Drive to Hewell Road is a black spot with poor road layout and vehicle right-of-way onto this now busy route - Brockhill Drive is a minor road and not able to take more traffic than currently uses it - Increased congestion at the Foxlydiate roundabout - The Brockhill Drive/ Bromsgrove 	<p>The purpose of main access roads is to distribute traffic around the town avoiding residential streets</p> <p>Not a rat-run – classified as a District Distributor route which are designed to facilitate free-flowing traffic around the town with minimal disruption. The only junction that currently suffers from vehicular right of way onto this route is the junction with Batchley Road. It may be possible to negotiate an upgrade for this junction if the Transport Assessment identifies this as an issue</p> <p>A Transport Assessment will be completed which will assess traffic implications of development</p>	<p>None</p> <p>Transport Assessment evidence to inform policy revision and possible junction upgrades</p> <p>Transport Assessment evidence to inform policy revision and</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Highway roundabout is very small and will easily become congested</p> <ul style="list-style-type: none"> - Hewell Lane needs to remain congestion-free for the regular security/prison vans which travel along this route. Increased traffic would cause congestion - More road traffic will occur, impacting on the road system locally and in the region <p>- Inadequate public transport in this area</p> <ul style="list-style-type: none"> - Site located far away from the Town Centre with no traffic-free cycling/ walking routes, leading to increased car usage <p>- Pollution from vehicle emissions will increase</p> <ul style="list-style-type: none"> - Volume of traffic will have a negative impact on the Hewell Grange Conservation Area <p>- Contradicts the North East Worcestershire Transport Strategy (2011-26) which boasts</p>	<p>A sustainable travel plan would be expected to accompany all development proposals. This is covered in Policy 4 – Sustainable Travel and Accessibility</p> <p>A Transport Assessment will be completed which will assess traffic implications of development. Measures to reduce traffic movements will be encouraged through sustainable transport policies i.e. modal shifts</p> <p>See comments above regarding existing capacity limitations in the urban area</p>	<p>location of development</p> <p>None</p> <p>Transport Assessment evidence to inform policy revision and location of development</p> <p>Progress a housing target to meet Redditch's needs based</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>of Redditch's trees, rural setting and green belt and suggests that future growth will be focused on existing urban areas</p> <p>- Approx 50% will travel outside of Redditch to work. Without adequate rail improvements on the Redditch line, more road traffic will impact on the road system</p> <p>Employment Issues: - No need for additional office/business units as there are hundreds of thousands of un-let square feet already in Redditch. The amount of un-let floorspace needs to be identified before decisions to build more are taken</p>	<p>61% of residents work in Redditch, with 11% working elsewhere in Worcestershire and 28% out of the County. Network Rail is proposing to increase train frequency to every 20 minutes</p> <p>As of 30/6/11 there was 77,859 sq m (838,075 sq ft) of industrial space available in the Borough. This represents a void rate of 8%. This void rate has been relatively consistent during the past 4 years. The longest an industrial unit that is currently available has been on our database is since 16/2/07.</p>	<p>on the imminent SHMA and other evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>Continue to provide suitable employment development opportunities within the Borough to meet our needs. Continue to liaise with Network Rail to implement this proposal</p> <p>Consider implications of Employment Land Review and determine a locally derived employment land target for Redditch</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Other Policy Issues: - PPG 12 (against which this plan was prepared) advises that a period of longer than 15 year from the base date of the plan will be appropriate</p>	<p>As of 30/6/11 there was 18,073 sq m of office accommodation available in the Borough. This represents a void rate of 16%. This void rate has been relatively consistent during the past 4 years. The longest an office suite that is currently available has been on our database is since 10/1/03</p> <p>There are only 8 office properties that have been available for more than 5 years, no industrial properties have been available for more than 5 years</p> <p>A void rate of c10% is considered optimum for a healthy market and sufficient available properties to generate demand</p> <p>Officers are aware that the plan period needs to reflect an appropriate end date in accordance with PPS3 para 53 and the end date and any associated targets will be</p>	<p>Reconsider appropriate end date for the Plan period</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- Contravenes PPS1 – as development at Brockhill does not ‘protect and enhance the quality, character and amenity value of the countryside and urban area as a whole’. A high level of protection should be given to valued landscapes. The proposal does not ‘seek to maintain and improve the local environment for local communities’</p> <p>- Contravenes PPS9 – As Green Belt, the site is of local importance and proposal does not attach appropriate weight to this in line with PPS9. RBC has not considered the contribution collectively of this site area and features to the landscape and vicinity. The GB is an important link in the unbroken ‘network of natural habitats’ which is ‘a valuable resource and stepping stone for the migration, dispersal, and genetic exchange of species in the wider environment’. These</p>	<p>amended accordingly in policy</p> <p>RBC has a duty to facilitate and promote sustainable patterns of development by making suitable land available for development (PPS1, para 5). The Government’s key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live</p> <p>Green Belt as an ‘important link to in the unbroken network of natural habitats’ is not one of the five purposes of Green Belt function identified in PPG2. However, Green Infrastructure forms a significant part of policy considerations when identifying land for development and any scheme would need to adequately address the natural resources within the site. PPS9 supports the integration of natural habitat networks within development (para 12)</p>	<p>Progress a housing target to meet Redditch’s needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing</p> <p>Consider policy wording to strengthen the need to address GI within the site and its immediate environs</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>proposals would break that chain</p> <ul style="list-style-type: none"> - Pending legislative changes on the horizon which will have an impact on the Core Strategy and more than likely require significant alterations and further consultation <p>Other Issues:</p> <ul style="list-style-type: none"> - Allocation of GB land is premature given the uncertainty of the housing target <ul style="list-style-type: none"> - Brownfield sites and empty homes should also be explored - 150 dwellings could be built somewhere more justified given the available evidence, without harm to the Green Belt 	<p>Agreed. When the Localism Agenda is clear and the National Planning Policy Framework is released, officers will reconsider development targets which are appropriate for Redditch and carry out policy amendments and further consultation</p> <p>Once the SHMA is published and a locally derived housing target can be determined. Green Belt designation will be reconsidered in line with the new housing target</p> <p>See officer response on pp.2-5</p> <p>See officer response on pp.2-5</p>	<p>Progress Core Strategy (Local Plan) following legislative changes and carry out further consultation</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence and continue to refresh the SHLAA in order to identify suitable land for housing</p> <p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<ul style="list-style-type: none"> - Concerned about the type of proposed housing. Existing Brockhill West is some of Redditch's prime real estate and development would destroy the real estate values of one of Redditch's better areas - Development will lower the tone and value of the existing estate, chasing away the owners of the larger more affluent houses as the area is no longer exclusive - Noise from the proposed development is a concern, in particular with reference to the scale and design of the Persimmon master plan - Development will create an ugly sprawl, losing natural breaks from other communities - There are limited spaces available at the local first schools, Development of this scale should be placed in an area where there 	<p>Development should include a range of types and tenures in order to provide balanced and mixed communities (PPS1). Development such as smaller or affordable homes should not be segregated from the larger, more affluent dwellings</p> <p>This is not a planning matter. Construction noise is finite and a short term consequence of meeting local development needs</p> <p>Unsure what natural breaks from other communities refers to. There are no other communities in this location other than Batchley</p> <p>Provision of local community facilities forms an integral part of the strategy site policy. Furthermore, wider provision for</p>	<p>Provide housing types and tenures in accordance with emerging SHMA evidence</p> <p>None</p> <p>None</p> <p>Reword policy to link to IDP</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>are already suitable community facilities in place</p> <ul style="list-style-type: none"> - Inadequate infrastructure in this area in terms of footpaths, transport, schools, health services and shops. No indication in the Strategy when these issues and flooding issues would be resolved in the development process - Policy contradicts Core Strategy Objectives 1, 4, 9 and 11 - Any development at Brockhill West should be mindful; of the developer issues at the existing Brockhill development <ul style="list-style-type: none"> – including flooding, unadopted roads, sewer network remaining 	<p>facilities such as doctors surgeries would form part of the Infrastructure Delivery Plan</p> <p>Contributes to Objective 9, and 2, 5, 7, 10 and 12. One policy cannot meet all CS objectives. The CS balances achieving all its development and enhancement/ protection objectives by producing a Plan that, when taken in its entirety, provides for all of Redditch's needs. There is an expectation of compromise to achieve a plan that balances all Redditch's needs</p> <p>This issue is currently being dealt with</p>	<p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>unadopted</p> <ul style="list-style-type: none"> - Considers that SHLAA reference to Brockhill West details several reasons for not developing this area which have been ignored - It is clear that there is no support for development at this site. The Council is obliged to have regard to public opinion. To disregard the force of such opinion would be unconscionable and unconstitutional - The fact that this is a sparsely populated area should count against development 	<p>SHLAA identifies constraints which may need mitigation measures as opposed to identifying major reasons to not developing the site</p> <p>See officer response on pp.2-5</p> <p>Any areas on the edge of an urban area would be sparsely populated. This is not a planning consideration</p>	<p>None</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- WYG (2009 p. 28 & 58) outlined disadvantages for development at Brockhill</p> <p>- Planners have reacted to pressures from external sources i.e. greedy developers only concerned with profit, not the local area</p> <p>- RBC has given no legitimate reason for this development</p> <p>- Development will change the character of the existing Brockhill area. High density housing, commercial properties and shops will be detrimental to the area</p>	<p>It was an intention of the report to identify disadvantages. However, these do not necessarily preclude development of a site</p> <p>See officer response on pp.2-5</p> <p>Housing densities will be expected to meet the density standards in current and emerging policy. Existing Brockhill has no community facilities at present, additional development will trigger the need for such facilities in this area</p>	<p>None</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		- Impact on businesses in Batchley as current 'through traffic' will bypass them through the new estate	The response is not clear which businesses would be affected. However, officers do not consider it to be a risk to any existing businesses in this area	None
R030	WCC	<p>Suggests the following amendments to the policy (in italics):</p> <p>iv. Creation of new and improved footways <i>“and cycleways and routes”</i> particularly to the north of the site from the rural area into the urban area are required;</p> <p>v. Improvements to the existing bus network infrastructure <i>“and services such that it will provide reliable and convenient access into”</i> the Town Centre, <i>“Redditch railway station and to key employment, health, education, retail and leisure facilities and services;”</i></p> <p>vi. Create appropriate and safe access into the site informed by a Transport Assessment;</p>	<p>Agree</p> <p>Agree</p> <p>These criteria comments should apply to all new development for Redditch. They would sit better</p>	<p>Incorporate into policy re-write</p> <p>Incorporate into policy re-write</p> <p>Ensure policy relates back to the Sustainable Travel and Accessibility</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p><i>and Facilitate possible links to the wider and strategic road network, including via the A448 and A441;</i></p> <p>The mode shares for walk, cycle and public transport must be maximised and infrastructure, service and Smarter Choices measures put in place to reduce car dependency and promote the use of walk, cycle and public transport to, from and within this area. Transport network impacts and” implications arising as a result of development of the strategic site must be mitigated against and this should be informed by a Transport Assessment submitted alongside any planning application</p>	<p>Consideration will be given to this wording when the strategic policy RJ is aligned</p>	<p>Align strategic policy RJ</p>
R064	Paxton	<p>Development on Green Belt land should be mitigated against through the provision of public green space. The provision of private front gardens should be discouraged in favour of public green space</p> <p>- This area is quiet and does not lend itself to new development</p>	<p>Public open space forms part of the requirements for any development scheme. Green Belt land is still needed to meet the development needs and all its associated (green) infrastructure. A certain amount of private front space is needed for off street parking provision and to</p>	<p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- The location of Hewell Grange correctional facilities also dictates against development in this area. The remote location of these facilities away from residential development should remain a factor when considering development in this area</p> <p>- Object to Foxlydiat Green Belt being relabeled as Brockhill West. The SHLAA identifies a number of</p>	<p>discourage density levels that might be perceived as too high, giving the impression of crammed development</p> <p>There is no agreed or statutory minimum distance one can develop up to a Prison however a distance of at least 4 metres is allowed beyond a Prison wall/fence when carrying out development on a Prison site to allow for perimeter controls using a motor vehicle.</p> <p>Where land sought to be developed is within four metres of a Prison boundary (or a greater distance where security might be undermined) HM Prison Service has compulsory purchase powers and would consider compulsory purchase of this land. (NOMS – National Offender Management Service)</p> <p>Brockhill West is just a strategic site name as it is less than the SHLAA area identified as</p>	<p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		major reasons why this site should not be developed	Foxlydiat Green Belt. SHLAA identifies constraints which may need mitigation measures as opposed to identifying major reasons to not developing the site	
R087	West Mercia Police	Reiterate previous comments that development in this location would require a new police post	Noted. Consider as part of IDP	Make reference to police provision in IDP
R093	Bruton Knowles	Support Brockhill West strategic site as it represents one of the most sustainable sites for growth	Support noted	None
R094	CPRE	Use of Green Belt for development requires evidence of the exceptional circumstances – there is no evidence in the RPDCS Taking away Green Belt in this location opens the gateway to further, greater development and destroys the concept of the Green Belt – to avoid merging of urban growth Object to building on the Green Belt and to the pursuit of new development prior to control of new development in the Core Strategy and establishment of Localism	See officer response at R003	See officer action at R003
R129(B)	Persimmon	Supports the identification of land	Support noted	None

Rep No.	Name	Summary	Officer Response	Officer Action
	Homes/ Miller Homes/ S&RD	<p>at Brockhill West as a strategic site for allocation in the CS:</p> <ul style="list-style-type: none"> - There are compelling exceptional circumstances to alter the Green Belt boundary in this location linked to the need to meet strategic housing and employment land requirements in a sustainable location - The objective should be to create a mixed and sustainable community which can best be achieved through comprehensive development including adjoining land in Bromsgrove District 	<p>Noted and agreed. However, when SHMA evidence emerges, RBC will revisit the need for reliance on GB land to meet its locally derived targets</p> <p>Once locally derived evidence is in place to support a housing target for the Borough, the matter of cross boundary development will be dealt with if the target suggests that Redditch cannot accommodate its evidenced target within the Borough boundary</p>	<p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence, emerging ADR evidence and continue to refresh the SHLAA in order to identify suitable and deliverable land for housing and to justify whether release of Green Belt land is necessary to meet a locally derived target</p> <p>Progress a housing target to meet Redditch's needs based on the imminent SHMA evidence. Consider whether cross boundary growth is an issue once evidence is in place</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- It has been demonstrated in the portfolio of information relating to Brockhill West that the land in Redditch Borough can be developed effectively in respect of technical infrastructure requirements and linkages to the adjoining urban area. The portfolio also demonstrates how development can be delivered effectively on a cross boundary basis</p> <p>- Suggests that the strategic site boundary is redrawn to exclude land south of Brockhill Drive</p> <p>- The development area should be removed from the GB as part of the plan changes in the area along with the community woodland area. These green areas should continue to be protected by Local Plan policies or their equivalent CS policy</p> <p>Broadly concurs with most of the 18 specific development principles</p>	<p>The information in the Brockhill West portfolio has played an intrinsic part in this policy's development and RBC welcomes the information that the developer has provided and continues to do so</p> <p>Agree that the strategic site boundary needs refining rather than including all GB land in this vicinity</p> <p>Pockets of GB protecting the community woodland areas may not be appropriate if GB boundaries are reviewed. An alternative protection for these areas may be necessary</p>	<p>Continue reference to site portfolio when refining policy</p> <p>Redefine strategic site boundary is line with GB review</p> <p>Consider alternative protection to areas of community woodland if GB boundary altered in this vicinity</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>included in Policy 30 but has some concerns as follows:</p> <ul style="list-style-type: none"> - The policy should refer to the design of the development being required to enable comprehensive cross-boundary development in Bromsgrove District which may be allocated through a Bromsgrove CS or other DPD - Principle iv – should be reworded for clarity. There is agreement that a comprehensive network of pedestrian routes should be provided as part of the Brockhill West scheme. The extent of the network will be dependent on whether there are comprehensive cross boundary proposals for both Districts. Footpaths will link to the existing rural footpath network and capable of links to a potentially larger urban area. There will also be appropriate links across Brockhill Drive to Foxlydiate Wood 	<p>Once locally derived evidence is in place to support a housing target for the Borough, the matter of cross boundary development will be dealt with if the target suggests that Redditch cannot accommodate its evidenced target within the Borough boundary</p> <p>Policy criteria need aligning across all the strategic site policies for consistency</p>	<p>Progress a housing target to meet Redditch’s needs based on the imminent SHMA evidence. Consider whether cross boundary growth is an issue once evidence is in place</p> <p>Align policy criteria wording, where similar, across all strategic sites for consistency</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>where there is public access and community woodland</p> <p>- Principle v – Wording appropriate. It is recognised that public transport improvements should be addressed to serve the Brockhill West development. They should be proportionate to the scale of development</p> <p>- Principles vi and vii – should be combined as they are linked. It is not clear what is meant by ‘link roads should be provided where needed alongside all related junction improvements’. Consider that it is not necessary for the development to facilitate a new link between A448 and A441 as Brockhill Drive fulfils this role appropriately between A448 and Hewell Road. A revised principle vi requiring a Transport Assessment of the development to address site access, traffic impact, sustainable travel and appropriate mitigation measures should be included</p>	<p>Support noted</p> <p>Noted. Following consideration of an appropriate Transport Assessment and the requirements that might be highlighted in the Assessment officers will consider how these criteria can be clarified</p>	<p>Align policy criteria wording, where similar, across all strategic sites for consistency</p> <p>Consider criteria rewording following consideration of Transport Assessment and align with other strategic policy wording if necessary</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>- Principles viii, ix, x and xii – recommend that viii, ix and x are combined to provide a single principle addressing landscape principles for the development of the site. As currently drafted, they lack clarity and could be interpreted as applying to a wider cross boundary development area e.g. the oil pipeline does not cross land within Redditch</p> <p>- Principle xvii – Is appropriate, however sand and gravel extraction could be considered only in this location if it is economically viable. Principle should clarify that the extent of any investigation should relate only to the area of the proposed allocation site</p> <p>- Principle xviii – disagree with the current wording of this principle. It may be unviable and will almost certainly not be feasible to provide all of the infrastructure at the start of any development. Request the</p>	<p>Noted. Officers will consider how these criteria can be clarified</p> <p>See officer response on p.11</p> <p>Noted. Officers will consider how this criterion can be clarified</p>	<p>Consider criteria rewording and alignment with other strategic site criteria where possible for clarity</p> <p>See officer action on p.11</p> <p>Consider criteria rewording and alignment with other strategic site criteria where possible for clarity</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>following rewording: <i>“the infrastructure requirements of the Brockhill West strategic site shall be met in phase with the construction of the development to ensure the impacts of the development are appropriately mitigated”</i>. If the intention of the principle was to ensure co-ordinated cross boundary development can be undertaken, then clarity is needed.</p> <p>Supports the principle of providing GI in Bromsgrove District as land adjacent to Batchley Brook is suitable for SUDs and recreational space. It is recognised that GI should be planned to form a satisfactory discrete development in the event that there were no cross boundary development</p> <p>- Reasoned justification – Supporting text should detail the suitability of the site for development and its deliverability</p>	<p>Support noted. However officers will try and align criteria wording comprehensively across all strategic site policies if possible for clarity</p> <p>Not sure why the supporting text should detail the suitability of the site for development and its deliverability. Officers consider that inclusion as a strategic site, cross referenced with Policy 7 -</p>	<p>Consider criteria rewording and alignment with other strategic site criteria where possible for clarity</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>There is a lack of consistency between the policy wording of Policy 29 and policy 30 and the general requirements for each site are expressed differently e.g. policy 30 refers to the requirement of an impact assessment to determine the acceptability of retail and/or community facilities, policy 29 does not. The wording should be dropped from policy 30 for consistency</p> <p>With reference to para 5, there is no evidence of the Landscape Character Assessment Sensitivity Map indicating that the area north of the B4184 is 'highly sensitive' Alternative wording is suggested to replace this paragraph (refer to original rep)</p>	<p>Development Strategy is detail enough</p> <p>Consider aligning strategic site policy wording for clarity</p> <p>Officers consider that the respondent is confusing Landscape Character Assessment with Historic Environment Assessment. The LCA does indeed identify the area north of the B4184 as falling within a 'high' sensitivity area. However this sensitivity area covers a wider landscape than that of the strategic site. Therefore, any development in this location would need to</p>	<p>Consider aligning strategic site policy wording for clarity</p> <p>Maintain communication lines with Worcestershire Environmental Policy Team and consider whether any further work is necessary to determine whether development in this area may be delayed/ dismissed</p>

Rep No.	Name	Summary	Officer Response	Officer Action
			<p>respect this sensitivity</p> <p>With respect to the HEA data, see officer response at R358</p>	<p>See officer action at R358</p>
R164	Davies	<p>This land should only be used when there is a proven and urgent need for land for new housing and employment development</p> <p>Future population predictions and thus the needs for development on greenfield sites is not reliable. The irrevocable decision to undertake development in this location should not be made until there is conclusive evidence of its necessity</p> <p>Our countryside is a precious, finite and irreplaceable resource. It should not be regarded as an expendable commodity to satisfy the demands of commercial developers</p> <p>The Borough of Redditch rightly prides itself on being a green area. RBC planners should have</p>	<p>See officer response at R003</p>	<p>See officer action at R003</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>the courage to reject past decisions to extend the town's growth beyond sustainable levels and focus on making the town an attractive area</p> <p>In the near future, land in this country may be urgently needed for growing food</p>	90% of the population lives on 12% of the land. There is sufficient land for agricultural uses	None
R180	Anderson	Reference is made to gravel deposits in this area. They act as balancing reservoirs and are important to the ecology in the area. Extraction of gravel before development could affect the lower sections of Foxlydiate and Pitcher Oak Woods, damaging the biodiversity. It will also significantly increase flows in Batchley Brook, especially in times of high rainfall	See officer response on p.11	See officer action on p.11
R306	Moss	On 5 December 05, as part of a major package of measures on planning and housing, the Government announced <i>The Town and Country Planning (Green Belt) Direction 2005</i> . It required local planning authorities	The Core Strategy and its supporting evidence will be presented to Public Inquiry where it will fall under the scrutiny of the Planning Inspectorate who will then make recommendations to the S of S as to whether the Plan	None

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>to notify the Secretary of State of applications for significant development, so they might be called in if necessary.</p> <ul style="list-style-type: none"> - Has the S of S been made aware of this proposal to build housing on Green Belt? - If so, what is their response? - If not, why not? <p>In the previous Bromsgrove and Redditch CS, Foxlydiate Green Belt was identified for 150 dwellings and is now in Appendix 2 of the consultation document as Brockhill West – 230 dwellings. Something is amiss in the CS</p>	<p>is sound and should be adopted. This is the appropriate point in the planning process for the S of S to be made aware of proposals of any nature in emerging Plans. This itself is not an actual application for significant development and there is no need for it to be called in. If an application were to be submitted on Green Belt land in advance of the CS progressing through the Inquiry process, then it would be necessary to either suggest to the applicant that its submission was premature and advise withdrawal, or in the case of a submitted application, refer it to the S of S</p> <p>230 dwellings was the estimated capacity of the site based on residential uses only. After the SHLAA was refreshed in 2010, the policy was written with a preference for some employment uses on the site, thus reducing the residential capacity. Appendix 2 represents a typo and will be amended</p>	<p>The SHLAA will be amended to read 150 dwellings to reflect the mixed use potential of the site and Appendix 2 will be amended due to typo error</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		Redditch Chamber of Commerce states that there is over 1 million square feet of employment property currently empty and unused in Redditch. How can new commercial development be justified against these figures?	See officer response on pp.17-18	See officer action on pp.17-18
R324	Whitworth	Consider that due to meetings held between consultants and RBC, the transparency and integrity of Policy 30 should be called into question. This has resulted in detailed plans being drawn up by the consultants and published two months prior to the CS consultation period. This shows that these companies were privy to information relating to Policy 30 prior to the residents of Brockhill. The unbiased nature of the CS and consideration of local views relating to this policy is overshadowed by the pre-emptive consultancy and discussions held between RBC and developers	This is not the case. Policy officers gather evidence to support the policies that are in the Core Strategy. Developers/ landowners with interest in sites in Redditch (including Webheath ADR for example) produce masterplans irrespective of whether sites are being proposed for development at any particular time. Developers are not privy to early release of policies for consultation. They are not consulted prior to the consultation period and process that all other consultees are invited to comment on	None
R358	English Heritage	Recommend that relevant information is drawn from the Historic Environment Assessment prepared by the County Council	The HEA rates this area (within HECZ148(e)) as having a medium sensitivity rating. HECZ148e covers an area much	Maintain communication lines with Worcestershire Archaeology Unit and

Rep No.	Name	Summary	Officer Response	Officer Action
		and additionally any more detailed and site specific information available from the County Historic Environment Record	larger than the Brockhill West Strategic Site and includes features such as Hewell Grange historic park and garden but it is not readily clear how appropriate the rating is to the particular area of the strategic site. Furthermore, the HER considers that this area has unknown potential. Ridge and furrow in the eastern part of the site could suggest below ground remains. HLC (Historic Landscape Character) is low. The strategic site may require further investigation by the developer to explore this unknown potential. However, investigative work may not necessarily negate development, it may just require some sensitivity during scheme preparation and that any historic find is properly taken account of	amend policy to require that basic investigative work is undertaken at the time of planning application. Make reference to HEA and HER in policy re-write .
R378	WCC	There is no mention of a GI concept plan as in policies 29 and 31. The development of a GI reference within this policy may offer the opportunity to reduce its content. A GI concept statement would help to reinforce the	Policy wording across the strategic site policies needs aligning. Reference to GI and GI policy for Policy 30 will be aligned with Policy 29	Clarify and align GI wording across Strategic Site policies

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>accompanying principles</p> <p>Would also seek stronger wording around the Hewell Grange SSSI; need to protect and buffer; and look for opportunities to link/ enhance as appropriate habitat, landscapes and recreation where possible. Principles xv and xvi in assessing and implementing a scheme for drainage/ SUDs should consider the wider catchment and relationship with Hewell Grange to ensure that they do not have an adverse or negative impact in the SSSI</p>	<p>Policy may need to be reworded to ensure adequate regard is paid to the setting of the conservation area</p>	<p>Reword policy to take account of the Hewell Grange conservation area</p>
R397	Save Brockhill Green Belt Petition	<p><i>“We the undersigned request RBC to abandon these damaging and inappropriate proposals</i></p> <p><i>We also request RBC to preserve and protect the green belt in Redditch and exempt it from any further development”</i></p>	<p>The comments detailed at this rep no. do not reflect the entire case put forward in the Petition. Some points have already been picked up under the main Brockhill rep at R003, starting on p.2. The points listed here represent additional points not previously listed. Officers consider that the entire case presented through the Save Brockhill Green Belt Petition have been picked up appropriately within this table, and those</p>	

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>The CS refers to the RSS target of 7000 dwellings up to 2026 and maintains that it remains in force until its official replacement by the Localism Bill</p> <p>There has been a change in circumstances since 2006 i.e. economic downturn</p> <p>During 1996-2006, of the 3367 dwellings built, only 20% provided affordable housing, which has created the current need for affordable housing</p>	<p>associated with Policies 8 and 29</p> <p>This is the case. The RPDCS proposed a housing target which was considered deliverable within its administrative boundaries whilst the cross boundary issue remained unresolved and a further steer was forthcoming from central government through the Localism Bill</p> <p>Agreed. The SHMA/ AHVA will take account of a full cycle of economic pressures placed on development targets, including both 'boom' and 'bust' scenarios</p> <p>During the 1996-2006 period, the Council did not have a target or a policy to co-ordinate the delivery of affordable housing provision within the Borough. This initiative has emerged through national planning policy over more recent years. Following adoption of BORLP3, an SPG was produced to enable delivery of affordable dwellings on sites of 25 units/ 1</p>	<p>Continue to progress a development target for Redditch, based on up to date SHMA/ SHLAA evidence as direction from the Localism Act</p> <p>Continue to progress a development target for Redditch, based on up to date SHMA/ SHLAA and AHVA evidence</p> <p>Continue to rely on SHMA and AHVA evidence to determine the affordable housing needs of the Borough</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Due to falling house prices, the Council waiting list should be reevaluated to ensure all of those on the waiting list are still in need before making final decisions on housing targets</p> <p>The CS model for development is 60% private, 40% affordable. Further breakdown shows that for every one affordable dwelling built, there will be 3 private. This ratio could be even greater than 3:1 as some developers believe this ratio is not high enough. Due to Redditch's land shortage, developers should be requested to reduce the private build percentage to allow more low cost rented social housing</p>	<p>ha or more. Further revision to national policy reduced this threshold to sites of 15 units/ 0.5 ha. The SHMA will continue to monitor the level of affordable housing required in the Borough and the AHVA will monitor the viability of its delivery</p> <p>This type of evaluation has formed part of the SHMA evidence base and need has been adjusted accordingly</p> <p>The AHVA tests the appropriate level of affordable housing contribution on private developments. Private developers will not build sites with a higher affordable housing ratio as this affects profit margins. RSLs are currently not progressing sites due to funding and the economic climate. Sites need to be viable in order for development to come forward</p>	<p>None</p> <p>Continue to determine an appropriate level of affordable housing contribution through the AHVA and consider lowering the threshold in order to maximize provision</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>PPG2 para 2.12 states that any proposals affecting GB should relate to a timescale longer than the that adopted for other aspects of the Plan. CS Policy 7 states that all strategic sites (incl. Brockhill E & W) can come forward immediately. These two statements are in conflict</p> <p>The strategic site policy 30 makes no reference to the lands current designation of Green Belt. For public consultation, this is unacceptable, unprofessional and misleading. People were asked to comment on the Cs without a full and clear description of the site identified. Care should be taken to ensure documentation is complete, clear and accurate</p>	<p>PPG2 is referring to GB boundary alterations, which should be defensible for longer than the Plan period, not the time scale that development should come forward</p> <p>Noted. However the RPDCS proposes what would be in an adopted Plan and as such, the GB designation would cease. Having revisited previous Local Plan documents, where GB review has been suggested (BORLP2), it was noted that no mention of removal of GB designations was made previously. Although this does not necessarily make the current approach correct, it is an approach that has been adopted previously. However, officers consider that in the light of clarity and transparency, there is an opportunity to revisit reporting</p>	<p>None</p> <p>Officers to adopt a more carefully worded and transparent approach to policy writing in order to present a full and clear statement of intent</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Foxlydiat Green Belt as identified in the SHLAA has been relabeled as Brockhill West in CS. This is misleading and unacceptable as it has removed all reference to Green Belt for Brockhill West. In many cases, petitioners did not realise that Brockhill West was Green Belt and made no representations as part of the earlier consultation process in March 2011. This lacks transparency and cannot be explained as an error, oversight or simple mistake</p> <p>Brockhill West is not adjacent to the existing Brockhill estate and there are no linking footpaths, it adds little value to the</p>	<p>practices to ensure the correct message is being relayed. The manner in which the policy was structured was not an intentional attempt to mislead. The CS Vision (p.20) makes reference to some changes to the Green Belt in Redditch</p> <p>See comment above. The strategic site relates to an area smaller than that identified in the SHLAA Foxlydiat Green Belt site. There was no intention to mis-lead</p> <p>Connectivity would be addressed through the policy and in any scheme for development. RBC, in its approach to identifying key</p>	<p>Officers to adopt a more carefully worded and transparent approach to policy writing in order to present a full and clear statement of intent</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>sustainability and deliverability of the CS. It would only provide about 37 affordable units</p> <p>This strategic site is clearly seen by the developers as an enabler to wider development on adjacent Bromsgrove Green Belt (SHLAA LOQ info)</p> <p>Policy 30 refers to a stream and oil pipeline, neither of which exists within the strategic site, but are in</p>	<p>sites to meet development needs has, in the first instance looked at urban sites (brownfield and greenfield), and followed by ADR and edge of town areas. The targets for development have meant that not all needs can be met without consideration of Green Belt land as a last resort. A site of around 150 dwellings would be expected to deliver affordable homes at a rate of 40%. This would secure approximately 60 affordable units. Every affordable dwelling represents a positive contribution to the housing needs of Redditch</p> <p>Developers often have wider development ideas than those proposed. Until a decision on cross boundary growth has been made, RBC has no intention of identifying a larger area for development in this location</p> <p>Noted and agreed</p>	<p>None</p> <p>Remove reference to features beyond the Borough boundary in</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Bromsgrove. This cross boundary reference is inappropriate ahead of cross boundary discussions with BDC</p> <p>How can 150 dwellings justify having associated retail and employment land? It is obvious that this retail/employment development is consistent to the greater plan for cross boundary development (shown on RPS concept masterplan – option 1</p> <p>RPS informed us that option 1 was RBCs preferred option and this may add some bias when deciding the best location for cross boundary consideration and development</p>	<p>Retail provision and community facilities have been identified in both Brockhill policies, however the likelihood is that only one location would be needed to meet needs in this vicinity. Officers have located employment opportunities in all strategic sites, where there is good connectivity to the major road network</p> <p>This comment is misleading on behalf of the developers. The fact that some employment land has been identified in this location ties in with option 1 of the developers masterplans. RBC has not collaborated with developers and their masterplans. In no way does the Redditch strategic site preempt a decision on cross boundary site locations. The strategic site within Redditch is capable of development in its own</p>	<p>the policy as long as the context of the site is respected</p> <p>None</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Recent public consultation by developers for land east of the railway on Brockhill ADR for around 200 dwellings could replace the 150 identified at Brockhill West</p> <p>Allowing Green Belt in Brockhill to be developed would set a planning precedent for all Green Belt land within the Borough. Further public consultation and involvement should be considered on the issue of Green Belt development, involving local communities as proposed in the Localism Bill</p>	<p>right</p> <p>Land east of the railway at Brockhill East may have some capacity for residential development depending on the requirement to keep the Bordesley Bypass road reserve. However this might represent an additional contribution towards meeting a development target rather than a replacement for land identified at Brockhill West. Until the housing target for Redditch has been determined, it is not possible to identify how much land in these locations will still be needed to meet any target</p> <p>PPG2/ NPPF will still exist to prevent unnecessary GB development. Given the RSS Panel recommended cross boundary growth for Redditch, officers consider that the south west GB within the Redditch administrative has been successfully defended against inappropriate urban sprawl</p>	<p>Continue to develop a housing target for Redditch based on emerging SHMA evidence</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>What is the justification for the change of circumstance with regard to the delivery timeframe for Brockhill West identified in the SHLAA (+10 yrs) and CS Policy 7 (all strategic sites can come forward immediately)</p> <p>Removing Brockhill Green Belt from the CS would not restrict non GB development from taking place. There is sufficient land identified to keep developers busy until a complete resolution of this issue has been reached</p>	<p>The strategic sites are the fundamental delivery mechanism for the CS development targets. Policy 7 offers the sites the opportunity to contribute towards the strategic at an early opportunity as the target identified within Redditch may only be a proportion of the overall target if SHMA evidence suggests a larger target than that already identified. The lead-in times for development on sites such as Brockhill West may not be that imminent given the constraints, such as minerals deposits, that would need to be addressed beforehand</p> <p>See comment above. There is still some uncertainty surrounding the development targets for Redditch. The RPDCS reflects the most current position at that point in time. Policy progression and additional evidence offers the opportunity to revise emerging policy at an appropriate juncture</p>	<p>None</p> <p>Continue to develop a housing target for Redditch based on emerging SHMA evidence</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Under the previous government Coventry, Nuneaton & Bedworth and Warwick councils were facing a similar threat. This threat has been removed at present but one must be vigilant and ensure that councillors abide by the wishes of local people</p> <p>Take note of what the Government are saying</p> <p>This development is totally against the original plans for</p>	<p>The decisions taken by other local authorities still need to be evidenced. Officers at RBC can only input into the planning system with respect to Redditch related issues. All CS work is scrutinized by Members and progresses through the Executive Committee and Full Council. Therefore, the views of Members are taken into consideration as they have the elective power to approve or dismiss CS consultation</p> <p>The government is pursuing a growth agenda and requires new homes to be built, whilst promoting a Localism agenda. RBC officers are considering emerging evidence to determine an appropriate development target for Redditch, whilst awaiting further advice on the Localism agenda and emerging NPPF</p> <p>Unsure who made this promise. However, at the time of Brockhill</p>	<p>Continue to progress the CS through the appropriate RBC committee process</p> <p>Continue to develop a housing target for Redditch based on emerging SHMA evidence</p> <p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p>Brockhill. We were promised this land would never be built on when we bought our house</p> <p>In the words of Carole Gandy, the town must not be concreted over</p>	<p>completions, BORLP3 was the adopted local plan and there were no plans to roll back GB further than that released for the original Brockhill designation in BORLP2</p> <p>All CS work is scrutinized by Members and progresses through the Executive Committee and Full Council. Therefore, the views of Members are taken into consideration as they have the elective power to approve or dismiss CS consultation</p>	<p>Continue to progress the CS through the appropriate RBC committee process</p>

Policy 31 Land to the rear of the Alexandra Hospital

Rep No.	Name	Summary	Officer Response	Officer Action
R010	Lewis	The hospital is a growing area of success and further development here may help to attract professional personnel to assist the needed health care provider.	Agreed.	None.
R030	Worcestershire County Council	<p>Add the following criteria to the policy:</p> <p><u><i>"The development design must:</i></u></p> <ul style="list-style-type: none"> • <u><i>Reduce the need to travel (especially by car) to/from the development</i></u> • <u><i>Tackle the environmental and economic impact of travel generated by the development</i></u> • <u><i>Maximise the accessibility of the development by sustainable modes</i></u> • <u><i>Include other measures and plans which assist in influencing travel behaviour (e.g. active and effective and sustainable travel plans, smarter choices measures, real-time information systems for passenger transport users etc.)</i></u> • <u><i>Satisfy the relevant tests</i></u> 	It is considered that this wording is too detailed for inclusion within the Policy and is sufficiently covered by the Sustainable Travel and Accessibility Policy.	None.

		<p><u>required by Planning Policy Statement 4.”</u></p>		
		<p>Add the following bullet point to the policy: <u>“An enhanced multi-modal interchange should be provided at the Alexandra Hospital. This must be integrated with the proposed development, thereby helping to maximize use of sustainable transport modes.”</u></p>	<p>This is not relevant to the Development Site; however it is an appropriate infrastructure request and will be considered through the infrastructure work.</p>	<p>Ensure comment is considered when completing infrastructure work.</p>
		<p><u>Reasoned Justification</u> Amend paragraph of the Reasoned Justification to read: <i>“In ensuring that the site is sustainable and complies with other policies in this Core Strategy as well as National Planning requirements and the <u>Worcestershire LTP3</u> it is important that the accessibility by a range of transport modes to and from the hospital is incorporated into the proposals. <u>The mode share for walk, cycle and public transport must be maximized and infrastructure, service and Smarter Choices measures put in place to reduce car dependency and promote the use of walk, cycle and public transport to, from</u></i></p>	<p>The majority of this suggestion is already adequately covered by the Policy on Sustainable Travel and Accessibility. However reference to LTP3 and the need for a Transport Assessment will be included.</p>	<p>Amend Policy to read, <i>“Complete a detailed transport assessment and detailed modelling to assess any impact and possible mitigation measures that may be required on affected junctions (as indicated in the Transport Assessment).”</i></p> <p>Amend Reasoned Justification to read, <i>“In ensuring that the site is sustainable and complies with other policies in this Core Strategy as well as</i></p>

		<u>and within this area. Transport network impacts and implications arising as a result of development of the strategic site must be mitigated against and this should be informed by a Transport Assessment submitted alongside any planning application.”</u>		National Planning requirements and the Worcestershire LTP3.”
R041	Patten	Land is more suited to a nature reserve and parkland for the community.	The land does not have any special wildlife or nature designation and has been put forward by the owners as being suitable for development. Following assessment by the Council the land is considered to be a suitable Strategic Site for inclusion within the Core Strategy.	None.
R083	Charmings	There should not be any vehicular access onto the lane from any new development to the rear of the Alexandra Hospital. Green Lane is narrow and an unsuitable thoroughfare for any increase in traffic. It is used as a ‘rat run’ and is subject to speeding. It is also subject to flooding due to runoff from surrounding fields, more housing would make this worse.	Access on to the development site would not be taken from Green lane. The most suitable access is deemed to be from Nine Days Lane; however this would be clarified and detailed at the planning application stage.	None.
R090	C Totney OBO Bigwood	Support for this Policy. It is important that development of this site is compatible with the ongoing	Support noted and agreed.	None.

	OBO the Secretary of State for Health	use and operation of the Alexandra Hospital, residential use is particularly compatible in this regard and may enhance the sustainability of the hospital by providing opportunities for staff to live close to their work. Also recognise that an element of B1 office use of the right nature and developed in the correct manner should not materially impact upon the adjacent hospital or its proper functioning. Land makes an important contribution to future development requirements of the Borough.		
R108	Hawkins	There should be protection of playing fields behind Kingsley College.	There are no plans for development of this area. The Strategic Site proposed does not include the playing fields.	None.
R128	H Pankhurst OBO Natural England	Significant concerns with the promotion of this site due to the presence of lowland meadow, a UK BAP priority habitat, important hedgerows and the proximity to Rough Hill & Wire Hill Woods SSSI. Any development would have to be delivered with great sensitivity. Whilst the Reasoned Justification does start to explain this, we recommend a stronger	Agreed. Policy will be amended to reflect concerns regarding the lowland meadow, BAP habitat, hedgerows and close proximity to Rough Hill & Wire Hill Woods SSSI.	Amend policy wording to , <i>“Respect the natural features of the site (including the lowland meadow, the UK BAP Priority Habitat and Important hedgerows’), topography and biodiversity and respect proximity to the Rough</i>

		emphasis within the policy itself.		<i>Hill & Wire Hill Woods SSSI and extend the tree belt located on the boundaries, into the site in accordance with the land to the rear of the Alexandra Hospital Green Infrastructure concept statement”</i>
		Welcome the promotion of an Alexandra Hospital GI Concept Plan as a means of ensuring these matters are given adequate consideration.	Support noted.	None.
R174	Bedford-Smith	Development should be subject to views of hospital and residents and traffic designation.	Agreed, in preparation of the SPD and this Core Strategy these stakeholders were consulted, in addition the hospital and local residents would be consulted should a planning application be received for the site.	None.
R202	White	Land should be left for expansion of the hospital is required.	The land directly at the rear of the Alexandra Hospital is excluded from the strategic site development boundary to be retained for hospital expansion. Please see Policy on Health Facilities for more detail.	None.
R319	R Bray OBO Worcestrshire	Support for this policy and development for principally	Support noted and agreed.	None.

	Acute Hospital NHS Trust	residential purposes. It is important that B1 office development in terms of location and nature is compatible with and will not impact upon the adjoining healthcare use as noted in point's ii and iv of the policy.		
		Fully supportive of point iv.	Support noted.	None.
		Query point vi as to when the Alexandra Hospital Green Infrastructure Concept Statement will be produced.	The Alexandra hospital green infrastructure concept statement is currently being produced and will be complete before pre-submission consultation.	None.
R390	Blakeway	There should be no more construction in the Green Belt. The people of Redditch overwhelmingly reject this plan to build more homes, industrial sites and roads.	The Land to the Rear of the Alexandra is not within the Green Belt.	None.
R378	Worcestershire County Council	Point (ii) refers to the need to <i>“support the use of the hospital facility”</i> . It is unclear how far all types of development would need to satisfy this.	The Reasoned Justification clearly outlines how development could ensure compatibility with the hospital use; however the paragraph will be amended to ensure clarity.	Amend paragraph to, <i>“The Alexandra Hospital needs to be respected as part of the development. Consideration should be given to the daily functioning of the hospital site, for example thought should be given to limiting overlooking of the</i>

				<i>hospital facilities, development should not impact on emergency services and the use of the office facilities should be compatible with the hospital,."</i>
		Point (iv) is unnecessary.	This point has been required by the NHS Trust it also provides clarity to potential applicants on surrounding land uses. Agree – check with Emma	None.
		Point (vi) refers to a Green Infrastructure Concept Statement, it is recommended that this is prepared in partnership with the sub regional GI Steering Group. The Reasoned Justification refers to the proximity to the SSSI and the need for SUDS but no mention is made of the need for consideration of a multifunctional green infrastructure.	Agreed. The Statement will be complete before pre-submission consultation. Reasoned Justification will be amended to make reference to multifunctional green space including a link to the Green Infrastructure Policy.	<i>"This is inclusive of the design of buildings but also the positioning of development in terms of respecting the topography of the area, considering the impact on local biodiversity and the screening of the site, it is also essential <u>that multifunction green space is provided as part of any development in line with the Policy on Green Infrastructure.</u>"</i>

Policy 32 Woodrow Strategic Site

Rep No.	Name	Summary	Officer Response	Officer Action
R055	Wakeman	Woodrow – development in areas of Woodrow on old industrial sites would be beneficial in preference to extending beyond existing boundaries.	Noted – The boundaries of Woodrow Centre are not proposed for any extension. There are no old industrial sites within the district centre boundary.	None
R202	White	Housing should be placed where the school was but adjoining green site should not be developed.	Agree the Strategic Housing Land Availability Assessment included the former brownfield parts of the Woodrow strategic site for housing however the boundary proposed doesn't include the adjacent green space	None

Strategic Sites – General responses

Rep No.	Name	Summary	Officer Response	Officer Action
R125	Barton Willmore	<p>Note that Appendix 2 refers to Foxlydiat Green Belt as a strategic site, however there is no policy for it</p> <p>Objects to the exclusion of Webheath ADR as a Strategic Site and recommends that an additional policy should be added to the Core Strategy (refer to original rep for full suggested policy wording)</p>	<p>Appendix 2 makes reference to the SHLAA site name/ number. Policy 30 of the RPDCS relates to this SHLAA site</p> <p>At the time of consultation, there was outstanding evidence with respect to transport issues and flood risk/ water cycle strategy, which put the deliverability of this site in doubt. When all evidence is in place, the suitability of this site will be reconsidered against the evidence base and the housing target to ensure it is needed to meet the target</p>	<p>None</p> <p>Consider the suitability and need for this site against evidence base information and the imminent SHMA</p>
R129(A)	Persimmon Homes	<p>There is a lack of consistency between Policy 29 and Policy 30. Although they are clearly different areas and different considerations will apply, there is scope to introduce greater consistency in drafting policies i.e. alignment of common phrasing such as mix of uses/ mixed use elements etc</p>	<p>Consider aligning strategic site policy wording for clarity</p>	<p>Consider aligning strategic site policy wording for clarity</p>

Redditch Borough Council can collect money for improvements to infrastructure for example transport or schools.

7. What infrastructure improvements (including Green Infrastructure) would you like to see at:

- Brockhill East (825 dwellings and 6.6Ha of employment)
- Brockhill West (150 dwellings and 2.5Ha of employment)
- Land to the rear of the Alexandra Hospital (145 dwellings and 1.4Ha of employment)
- Woodrow Strategic Site (77-129 dwellings)

Rep No.	Name	Summary	Officer Response	Officer Action
R025	Barber	Brockhill East: Put a train station in so that there is no additional burden on the town centre train station car park.	It is not likely to be feasible to put a train station at Brockhill East due to the close proximity to the existing town centre train station. To date Network Rail have not indicated a need for a station in this location however this can be investigated through the infrastructure delivery plan.	Complete Infrastructure Delivery Plan for the Core Strategy.
R014	Sport England	All sites: Appropriate indoor and outdoor sports provision.	Provision will be made in accordance with the completed Playing Pitch Strategy for Redditch Borough and this will be reflected in the Infrastructure Delivery Plan.	Complete Infrastructure Delivery Plan for the Core Strategy.
R018	Coombs	All sites: Worcester County Council provide funding for highways and schools so any monies collected from these sites should be spent on local amenities such as day care	Worcestershire County Council relies on contributions from developers for schools and highways; it does not provide 100% of the funding. Contributions can be	Complete Infrastructure Delivery Plan for the Core Strategy.

		<p>centre, etc.</p> <p>The use of modern technology to capture heat from the ground and solar panels to mitigate greenhouse gas effect from the national grid.</p> <p>Improved methods of sewage disposal to reduce the amount of waste pumped.</p> <p>Improved communication via foot, cycle and public transport to reduce the amount of traffic movement.</p> <p>Improved local school facilities to mitigate the need to transport children across the borough.</p>	<p>collected for day care facilities if there is a proven need.</p> <p>It may be possible to collect monies to retrofit properties with measures to mitigate the effects of climate change.</p> <p>The emerging Water Cycle Study update indicates that Severn Trent Water have accounted for proposed growth and made provision for the cost of this to the standard that they require. There are however existing properties in rural areas that are not currently connected to the main sewerage network and this is something that it may be feasible to collect monies for.</p> <p>This is a key consideration for all of the strategic sites, and, where appropriate developer contributions can be sought.</p> <p>Contributions will continue to be collected as advised by Worcestershire County Council Education Services.</p>	<p>Investigate the potential of retrofitting properties with measures to mitigate the effects of climate change.</p> <p>Complete Infrastructure Delivery Plan for the Core Strategy.</p> <p>Complete Infrastructure Delivery Plan for the Core Strategy.</p> <p>Complete Infrastructure Delivery Plan for the Core Strategy.</p>
--	--	---	--	--

R034 R035 R092 R108	Sharpe Evans WYG Planning & Design Hawkins	Brockhill East: Local transport/road links need improvement. Particularly to Windsor Road & bypass connections.	The general road improvements required should Brockhill East be developed are broadly identified in the Transport Assessment. When planning applications are received, a detailed TA is required which would identify necessary improvements. Where appropriate contributions can be sought for wider infrastructure improvements.	Complete Infrastructure Delivery Plan for the Core Strategy.
R042	Best	Brockhill East/West: vital that the correct infrastructure is put in place, i.e. school, road network, good public transport, shops, surgeries and playing areas Rear of Alex: improved public transport and local shops	Agreed, the need for all of the suggested types of infrastructure will be assessed and, where appropriate, developer contributions can be sought. Public transport links will be a key consideration in the determination of any planning application for this site and if appropriate developer contributions will be sought. It is unlikely that the level of development at this site would trigger the need for a number of local shops. A number of shops in this location would not be in accordance with planning policy which directs retail development to the town and district centres.	Complete Infrastructure Delivery Plan for the Core Strategy. Complete Infrastructure Delivery Plan for the Core Strategy.

		Woodrow: modernisation of the shopping precinct and amenities.	Woodrow District Centre has been identified as in need of revitalisation and improvement; the Core Strategy includes a policy which encourages appropriate redevelopment.	None
R043	Rixon	Rear of Alex: more parking spaces for the hospital and other health services here and a centre to promote care in the community.	It is not appropriate to collect contributions for more parking spaces at the hospital. Should the hospital identify the need for a centre to promote care in the community it may be appropriate to collect monies towards it.	None
R065	Porteous	<p>There should be at least one more primary school and high school built in the west of Redditch if more housing is approved in this area.</p> <p>Thoughts should be given to extending or improving links to NCN 5, perhaps by using Weights Lane and Brockhill Lane.</p>	<p>The need has been identified for one first school only within the Brockhill East strategic site. However depending on the scale and location of growth, there could be a trigger for more school provision. Contributions will continue to be collected as advised by Worcestershire County Council Education Services.</p> <p>The national cycle network is maintained by Sustrans. The need for cycle links to support new development will need to be investigated and there is the potential to collect monies towards local cycle networks.</p>	<p>Complete Infrastructure Delivery Plan for the Core Strategy.</p> <p>Complete Infrastructure Delivery Plan for the Core Strategy.</p>

R067	Worcestershire Wildlife Trust	<p>Brockhill East & West: requires considerable GI enhancement. Should have at least 40% open space in line with best practices with urban extensions. GI here should be informed by the sub-regional GI strategy and the emerging GI Partnership comments. In essence though it should be designed to protect, enhance and re-connect existing semi-natural features in the landscape; seek to enhance the Red Ditch corridor and ensure that it is not severed by other infrastructure; buffer the nearby woodlands and provide accessible biodiverse open space for the benefit of the public and wildlife. The overall ethos should be to combine GI functions such that the open space delivers biodiversity enhancement, recreation space and SUDS capacity in an holistic way. Furthermore the site's green infrastructure must also reflect likely developments nearby and must seek to maintain corridors into the wider landscape.</p> <p>Rear of Alex: basic multi-functional GI must be brought forward on this site in line with the emerging sub-</p>	It is intended that Green Infrastructure Concept Statements will be produced for the strategic sites, where appropriate, to guide masterplanning and development.	Produce Green Infrastructure Concept Statements for strategic sites, where appropriate.
------	-------------------------------	---	---	---

		<p>regional and Redditch GI Strategies.</p> <p>Woodrow: GI here should be focussed on delivering multi-functional benefit on site in line with the GI principles laid out in the sub-regional GI Strategy.</p>		
R028	Lynn	<p>Brockhill East: Tidy the area which was to prevent flooding.</p> <p>The railings at the side of the road are ugly and it would be better to build a rustic little fence or bridge.</p>	<p>It is not clear what area this is, it may be appropriate to collect contributions towards the ongoing maintenance of flood defenses or if maintenance is a potential contributor to flooding in the area, this can be ensured after a detailed Flood Risk Assessment accompanies a planning application.</p> <p>It is not within the remit of the Core Strategy to specify the type of fencing/railings.</p>	<p>Complete Infrastructure Delivery Plan for the Core Strategy.</p> <p>None</p>
R080	White	<p>Brockhill East: Existing road system is inadequate and more traffic would create chaos. New school, community centre, green areas, play area, public house/restaurant.</p> <p>The town lacks basic facilities such as youth clubs, discos, swimming</p>	<p>It is appropriate to collect contributions towards schools, community centres, open space and play areas where the need has been identified. It is not appropriate to collect contributions for a public house/restaurant.</p> <p>It may be appropriate to collect contributions for some leisure</p>	<p>Complete Infrastructure Delivery Plan for the Core Strategy.</p> <p>Complete Infrastructure Delivery Plan for the</p>

		pools, snooker & pool halls, bowling alleys, etc.	facilities such as youth centres and swimming pools, where a need can be identified.	Core Strategy.
R084	Cunningham	Woodrow: Open up the bus lane from Studley Road near Woodrow Centre to improve vehicular access. Ensure Woodrow library does not close. Open a community centre to encourage community activities especially for teenagers and older people.	Opening the bus lane would be contrary to current Worcestershire County Council highways policy and there would be no wider community benefits in this case. It may be appropriate to collect contributions towards library provision however it is not possible to ensure Woodrow library does not close through the Core Strategy. Community activities do not necessarily require a community centre from which to operate, however should the need for a community centre or similar be identified it may be possible to collect contributions towards it.	Complete Infrastructure Delivery Plan for the Core Strategy. Complete Infrastructure Delivery Plan for the Core Strategy.
R103	Smith	Need to address public transport for all sites (in the light of funding cuts for bus provision).	Any contributions will need to be for infrastructure that is related to development. Public transport is a key consideration for development sites.	Complete Infrastructure Delivery Plan for the Core Strategy.
R104	Green	All sites: Keep existing hedges & trees, enhance open spaces and provide footpaths.	The retention of existing hedges and trees will be considered in the context of any planning applications and associated ecological assessments and tree surveys.	None

			Open spaces will continue to be provided as part of developments and, where appropriate, contributions collected.	
R113	Stallard	Brockhill East & West: Development of northern relief road Rear of Alex & Woodrow: Construction of link road to Studley.	Worcestershire County Council considers that the Bordesley bypass would not be deliverable without significant justification and funding being identified by developers. To date, the required justification and funding has not been provided by developers. The Studley Bypass was proposed to relieve flows on the A435, however this scheme was withdrawn and the previously made Orders revoked, effectively terminating the proposal. There is no proposal for such a bypass in the current Warwickshire Local Transport Plan.	None None
R115	Hayfield	Brockhill East & West: Form open spaces between homes.	Provision of open space will be required in line with the Council's adopted supplementary planning document and Open Space Needs Assessment. The exact location of open space would be determined through the planning application design process.	None

R117	Cotton	Before any development take place the Bordesley bypass needs to be built.	Worcestershire County Council considers that the Bordesley bypass would not be deliverable without significant justification and funding being identified by developers. To date, the required justification and funding has not been provided by developers.	None
R122	Carter	Improvements to the surrounding roads which are already overloaded.	Any improvements needed to the highway network will be identified through a transport assessment which the developer will be expected to provide or contribute towards.	Complete Infrastructure Delivery Plan for the Core Strategy.
R162	Campbell	Brockhill East: improvements to M42 Junction 3 and M5 Junction 5 to ease congestion.	The Highways Agency has indicated that the impact on these motorway junctions will depend on the level of growth that is planned for. As this is currently uncertain it is not yet possible to determine whether improvements will be needed.	Complete Infrastructure Delivery Plan for the Core Strategy.
R172	Heaselgrave	All sites: Enough amenities to support residents, shops, schools, etc.	An assessment of the infrastructure need will be made to support the delivery of the Core Strategy.	Complete Infrastructure Delivery Plan for the Core Strategy.
R174	Bedford-Smith	Brockhill East: Junction 3 of M42, Junction 5 of M5 and Bromsgrove junction A448 are forecast as being overloaded..	The Highways Agency has indicated that the impact on these motorway junctions will depend on the level of growth that is planned for. As this is currently uncertain it	None

		<p>The northern circular from A448 to A441, should be studied.</p> <p>Arguing for the Bordesley Bypass, avoiding if possible crossing the rail line.</p>	<p>is not yet possible to determine whether improvements will be needed. The impact on other roads will be determined through a transport assessment and appropriate solutions, where appropriate will be sought.</p> <p>This has not been considered as a realistic option.</p> <p>Worcestershire County Council considers that the Bordesley bypass would not be deliverable without significant justification and funding being identified by developers. To date, the required justification and funding has not been provided by developers.</p>	<p>None</p> <p>None</p>
R202	White	Brockhill East & West: Bus service is required.	The need for a bus service will be established in consultation with Worcestershire County Council Strategic Transport.	Complete Infrastructure Delivery Plan for the Core Strategy.
R318	Bonham	All sites: Any road changes necessary to prevent traffic difficulties.	The general road improvements required are broadly identified in the Transport Assessment. When planning applications are received, a detailed TA is required which would identify necessary improvements. Where appropriate contributions can be sought for	Complete Infrastructure Delivery Plan for the Core Strategy.

			wider infrastructure improvements.	
R351	A Warby L Warby	Brockhill: Open amenity space, local shops.	Open space will be provided as part of the development. The need for a local centre in Brockhill has been identified and to make the development acceptable, the developer will need to provide this.	Complete Infrastructure Delivery Plan for the Core Strategy.
R380	Jarret	All sites: better infrastructure of all types is needed including shops, informal play areas, nature reserves, sports facilities, and linked cycle ways.	All types of infrastructure listed can be collected for based on identified need.	Complete Infrastructure Delivery Plan for the Core Strategy.
R389	Sterry	Brockhill East: Small local shops are essential. Effective screening from all views on the approach to the A441. Brockhill West: shops, improved bus facilities and access to cycle networks.	The need for a local centre in Brockhill East has been identified and is expected to be provided by the developer To make the development acceptable. If appropriate, screening will be sought through the planning application process. The need for shops at Brockhill West has been identified and it is expected that these will be provided by the developer to make the development acceptable. It is possible to collect monies towards transport networks where there is an identified need.	Complete Infrastructure Delivery Plan for the Core Strategy. Complete Infrastructure Delivery Plan for the Core Strategy.

R087	WMP & HWFR	<p>Concerned that the Core Strategy does not include a dedicated policy covering infrastructure provision and its funding. This means that the council does not have a robust and credible basis to secure the infrastructure necessary to guarantee sustainable development and is contrary to national planning policy.</p> <p>The references to infrastructure in strategic site policies are fragmentary and inflexible as they would not allow the Council to seek funding and/or provision of any infrastructure requirements not specifically mentioned.</p> <p>An infrastructure policy should achieve:</p> <ul style="list-style-type: none"> - A stated commitment to engage with infrastructure/service providers in relevant planning matters; - Definition of what constitutes infrastructure, which should include the emergency services; 	<p>Agreed, a stand alone infrastructure policy will be inserted into the next draft of the Core Strategy based on the Infrastructure Delivery Plan.</p>	<p>Draft infrastructure policy for next draft of the Core Strategy.</p>
------	------------	--	---	---

		<p>and</p> <ul style="list-style-type: none"> - An explicit commitment to use planning conditions, Section 106, CIL, TIF and NHB to fund infrastructure requirements, including for the emergency services. <p>A suggested policy is included in the representation.</p> <p>The funding allocated to WMP and HWFR is insufficient to fund capital expenditure. CIL, TIF, NHB, planning conditions and planning obligations have the potential to remedy the weaknesses in the present infrastructure funding systems.</p>		
R091	Tetlow King	<p>Indication that planning obligations/CIL will deal with planning infrastructure provision should be set out in a separate policy.</p>	<p>Agreed, a stand alone infrastructure policy will be inserted into the next draft of the Core Strategy based on the Infrastructure Delivery Plan.</p>	<p>Draft infrastructure policy for next of the Core Strategy.</p>

Winyates Green Triangle & Associated land

Rep No.	Name	Summary	Officer Response	Officer Action
R086	Gorcott Settlement Trust	Owens land to north of Coventry Highway and would like it to be considered to meet cross-boundary development to meet Redditch's needs.	The potential for this land to be used to meet Redditch's development needs will have to be investigated with the co-operation of Bromsgrove District Council & Stratford-on-Avon District Council as it lies within their administrative areas.	Work with Bromsgrove and Stratford-on-Avon District Councils to investigate the potential for this land.

Other

12 Do you have any other comments to make on the Core Strategy?

Rep No.	Name	Summary	Officer Response	Officer Action
R007	Cardew	There should be a joint working agreement for cross border development at Bordesley.	There is a joint working agreement – we have a joint leader’s panel and Officers will continue to work closely together to resolve the Redditch growth issue. It is agreed that the strategies will need a coherent response.	Continue to progress Core Strategy and Evidence Base.
R008	Rose			
R015	Batty			
R016	Rowell			
R019	Morris			
R020	Baker			
R021	Carpenter			
R022	Clark			
R023	Phillpotts			
R029	Ostroumoff			
R036	Bourne			
R037	Bourne			
R038	Smith			
R039	Allen			
R040	Emms			
R042	Best			
R044	Allbutt			
R045	Smith			
R046	Lippett			
R049	Haigh			
R050	Haigh			
R051	Haigh			
R052	Haigh			
R054	Mason			

R057	Sinclair			
R061	Homer			
R063	Evans			
R074	Griffiths			
R076	Mason			
R082	Ramsay			
R101	Davies			
R116	Smith			
R118	Bartley			
R123	Mills			
R309	Moxon			
R310	Waldron			
R311	Hatton			
R312	Hatton			
R318	Bonham			
R343	Smith			
R344	Newburn			
R345	Flowers			
R346	Sims			
R347	Cruyton			
R348	Miller			
R349	Rose			
R350	Cale			
R354	Khoury			
R355	Kloetzli			
R356	Anderson			
R357	Bradshaw			
R380	Edmunds			
R383	Sinclair			
R384	McQuaid			
R385	McQuaid			

R386 R387	McQuaid McQuaid			
R009	Hughes	There should be a joint working agreement for cross border development at Bordesley. “The sooner Redditch and Bromsgrove Councils fully amalgamate the better.... As there will be more good quality land with good infrastructure...”	As above This is not relevant as councils aren't supposed to look at boundaries	None
R018	Coombs	There should be a joint working agreement for cross border development at Bordesley. The Core Strategy should be promoting the Town as being a great place to live/visit.	As above Each of the strategies aims to achieve this	None
R030	WCC	Key diagram should include the key elements of the bus network.	The transport map in the Local Portrait shows the major transport interchanges. The bus network would not usually be found on a key diagram. Bus routes etc would be on a separate map.	None
R048	William Davis Ltd	Questions the merits of consulting on the document when further consultation is needed on the issue of cross boundary growth. As recognised in the preferred	It is explained in the introduction that Redditch needed to consult on its own strategy to bring the whole issue up to date since the Council consulted on growth options in February 2010.	None

		<p>draft document, the WMRSS recommended the allocation of 3,000 dwellings within Bromsgrove District given the fact that Redditch is unable to accommodate its housing needs, based on 2006 projections, within its own boundaries. Clearly this is a very significant amount of growth with major implications to the town of Redditch and to Redditch Borough as a whole.</p> <p>Conclusions reached regarding the delivery of ADR land in Redditch means that the level of required cross boundary growth will now be higher.</p> <p>It is vitally important that the implications of this growth are considered alongside policies for the administrative area of Redditch and consequently Cross Boundary and Joint Working is needed throughout the production of this Core</p>	<p>This is incorrect - The CS did not comment on this matter, and made it clear that the appropriate level of growth cross boundary needed to be determined after gathering more evidence. Agree that the final Core Strategy would need to include both aspects</p> <p>This is not related to RBC's Preferred Draft Core Strategy, however a duty to cooperate has subsequently been introduced to hopefully avoid these kinds of omissions. As stated previously – this was done so as to bring internal issues up to date. Agree</p>	<p>None</p> <p>None</p>
--	--	--	---	-------------------------

		<p>Strategy. Concerned by the complete omission of cross boundary issues from BDC's Draft Core Strategy 2. Clearly joint working is not taking place, so consider any consultation document produced before cross boundary issues are resolved to be premature. Should cross-boundary growth not be included in future documents, a comprehensive evidence base should be in place, either demonstrating that the dwellings aren't required or can be accommodated elsewhere within the borough.</p> <p>The duty to co-operate in the Localism Bill is not being followed. We consider this will have implications for the soundness of the plan.</p>	<p>that cross boundary could only be omitted if the evidence suggested that this was supported</p> <p>The duty to cooperate did follow the publication of the Redditch strategy; however Officers disagree that the strategy presented would have a soundness issue, as the stance on cross boundary growth was clearly described in RBC's Core Strategy as something which clearly couldn't be dismissed without the evidence.</p>	None
R077	Rogers	Concerns about mud and debris	This would be addressed on a	None

		not being cleared from roads and noise and dust produced during construction. Existing problems should be addressed before any new development is commenced.	site by site basis through conditions on planning permission where appropriate	
R086	Gorcott Settlement Trust	Continue to promote the land at Gorcott for cross boundary growth.	Noted. A subsequent discussion indicates that a collaborative approach on delivery of infrastructure in this area may negate any deliverability concerns	None
R092	Gallagher Estates	No mention of the requirements set out in PPS3 to allocate sufficient land for at least 15 years post adoption. The LPA is treating the housing requirements as two separate components (cross boundary and within boundary). PPS12 encourages joint working and the production of joint core strategies in locations where housing catchments are wider than district boundaries. And where a strategic approach to infrastructure is required. There is justification for the preparation for a joint Core Strategy.	Although it may not be directly mentioned, officers are aware of the requirements of PPS3. It's not appropriate to repeat national policy in local level documents. This is how the RSS presented the matter and given the uncertainties with wider growth and the evidence to support the levels of provision, RBC aimed to bring out a Core Strategy which set the markers for moving forward with delivering for Redditch's requirements. Whilst the strategies are obviously linked in terms of site provision, in other respects the two areas are different and	None None

		Gallagher would be pleased to input ideas should a joint working approach be adopted.	delivery of the vision and priorities is felt to be stronger through separate core strategies.	
R105	Dewhurst	Hope that RBC will continue to listen to the views of residents and make the right decisions for the people it represents.	Noted	None
R025	Barber	Appreciates a lot of work has gone into preparing the Core Strategy, but feels that proposals are completely contradicting the objectives set out. BDC should be discouraged from pursuing development on adjacent land.	Without the evidence to suggest that development adjacent to Redditch isn't needed, then Bromsgrove would be encouraged to identify land to meet Redditch's needs.	Continue to progress Core Strategy and Evidence Base.
R059	Watkiss	Transport provision should be a primary concern in particular improving access for pedestrians and cyclists. Difficulties for buses turning out of the bus station also needs to be addressed.	The Redditch transport assessment has recently been completed and takes into account accessibility of key sites by a range of modes of transport. The issues regarding the bus station are not a Core Strategy matter.	None
R065	Porteous	Shocked that new housing in the Bordesley area has not been considered. The current Redditch/Bromsgrove boundary in that area is bizarre and needs addressing.	This option has not been ruled out, but all detail on growth wider than Redditch wasn't included purposefully for reasons stated. The Core Strategy would not amend local authority boundaries.	Continue to progress Core Strategy and Evidence Base.
R069 &	Sutton	More viable housing sites (than	Detail on growth beyond	Continue to progress

70		Brockhill) within Redditch, Bromsgrove & Stratford. Bromsgrove has a shortage of affordable housing, so housing would be better located there.	Redditch's boundaries was not included for the reasons stated, however it should be noted that Bromsgrove and Stratford have their own housing requirements to meet as well as Redditch.	Core Strategy and Evidence Base.
R083 R380	Chamings Jarrett	Please don't build on the green belt – they are valuable pieces of open space dividing our counties. Should be protected wherever possible.	Agree that the purpose of GB is to prevent coalescence amongst other things but the principle of release and evidence supporting it was developed through the RSS and can't be refuted. So the focus now needs to be where Green Belt release can be made in the most appropriate locations.	Continue to progress Core Strategy and Evidence Base.
R084	Cunningham	A carefully reasoned document by people trying to understand the needs and aspirations of residents. In sharp contrast to the last review by planning inspectors in March 2010.	Noted	None
R093	Bruton Knowles	Any development in the North West of Redditch should be capable of comprehensive treatment with adjoining land in Bromsgrove.	Agree that whilst there are some constraints, there are no known issues with the capability of comprehensive development based on the evidence available.	Continue to progress Core Strategy and Evidence Base.
R096	Griffin	Too much, too soon, too short-term and politically linked to government targets. Accountability has to be viewed as a long-term issue, not a	Local Authorities have to determine their own targets so they are not government led. The Core Strategy must plan for a 15 year time horizon in line with	Continue to progress Core Strategy and Evidence Base.

		parliamentary party issue.	national guidance.	
R098	Pitchford	Why has the council not alerted the population directly, rather than relying on interest groups.	The Council has undertaken a range of types of consultation in line with the Statement of Community Involvement.	None
R100	Selves	Abandon the CS	The Local Planning Authority has a duty to plan for the area, without the strategy Redditch would be at risk from inappropriate development.	Continue to progress Core Strategy and Evidence Base.
R102	Craddock	Urge the council to reconsider proposals, considering the wellbeing of current citizens as well as future ones.	The Council has a duty to plan for future development. The Core Strategy vision includes the promotion of Redditch's Community Well-being.	Continue to progress Core Strategy and Evidence Base.
R108	Hawkins	The detail will put a lot off people off reading it – a briefer digest would be a good idea.	The aim is to provide a short succinct document which is easier to read, and officers have shortened the content compared to previous versions.	None
R109	Smith	Redditch has done its duty as a new town taking in people from the West Midlands and now needs to stabilize and build communities. The limited space left should be used to provide jobs/house/flats for current residents of all ages.	Officers agree – housing targets will need to be based on Redditch's needs.	Continue to progress Core Strategy and Evidence Base.
R113	Stallard	Too flowery. Subjective, not objective	The strategy as a whole sets out a vision and objectives explaining what needs to change	None

			and why. The policies explain how to deliver that change, so it is unclear what is meant by 'subjective'.	
R115	Hayfield	Learn from past mistakes	It is not clear what the respondent is referring to.	None
R117	Cotton	They government keeps saying let local people make decisions, so ask if people want more housing.	The Core Strategy is the opportunity to present a level of growth and for the community to respond, which is what has been achieved.	Continue to progress Core Strategy and Evidence Base.
R122	Carter	Need to consider aging population; car parking in strategic sites, young population – schools. Safe routes where children can walk to school.	Agree	Continue to progress Core Strategy and Evidence Base.
R125	Barton Wilmore	Consider adoption in 2013 to be more realistic and therefore the timeline should be up to at least 2027. Key Diagram - object to identifications of Webheath as an ADR. Should be a 'Strategic Site'. Numerous references throughout the document to further work being required, demonstrates that the evidence base has not underpinned the draft Core Strategy. The document would fail the test of soundness in this	Agree Those responsible for the delivery of this site need to assist the Borough Council in understanding how constraints on this site can be overcome. The Webheath ADR was removed as a site to be relied upon because of a question over its deliverability. Since then more evidence produced for RBC indicates that transport matters may be able to be resolved but issues with drainage are still unresolved. Unless the	Continue to progress Core Strategy and Evidence Base.

		respect.	<p>SFRAWCS indicates that there are sustainable methods of drainage which can be delivered, the CS cannot rely on it coming forward. Officers in developing the WCS foresee that the issue could be resolved, therefore discussion with STWL/landowner needs to commence to understand viability issues involved and following that, the Webheath ADR could be relied upon to be delivered.</p> <p>Whilst the onus is on the Council to submit what it considers to be a sound strategy, RBC is not at submission stage and evidence to date supported the draft Core Strategy.</p>	
R128	Natural England	<p>Welcome the identification of Redditch's landscape sensitivity & GI network as challenges under 'creating and sustaining a green environment'</p> <p>Local portrait – strongly support section on the environment, but would welcome reference to GI in this section in conjunction with reference to Redditch as a New Town.</p>	<p>Noted</p> <p>Agree</p>	<p>Amend wording of Local Portrait under environment section to read:</p> <p>“New Town Planning Proposals requiring that green infrastructure must be woven in to the fabric of the town.”</p>

R129	Persimmon	Essential that RBC Core Strategy makes proper reference to co-ordinated delivery of development where land in Bromsgrove District is required to meet development needs. Not clear whether a new proposals map will be prepared. Suggests that the proposals map should be updated and re-issued as part of the Core Strategy.	Agree, this will need to be incorporated into the final version of the Core Strategy if cross-boundary development is required. A proposals map will be published reflecting the Core Strategy.	Continue to progress Core Strategy and Evidence Base. Prepare proposals map.
R169	Showell	Respondent feels that new houses are required due to an influx of residents from other areas.	This is incorrect; the housing requirement would need to be based on Redditch's needs only.	None
R176 R177	Styler Styler	Return Webheath ADR to green belt	Webheath ADR has never been green belt. It does not serve the purpose of green belt as described in PPG2.	None
R178	Styler	Preserve Redditch as it is & make it a better place to live	RBC has a duty to plan for the area, without the strategy Redditch would be at risk from inappropriate development.	Continue to progress Core Strategy and Evidence Base.
R183	Comelio	The 3000 dwellings that Bromsgrove should be accommodating (WMRSS) for Redditch are not mentioned in their Core Strategy consultation. Are they planning future boundary changes and further consultations?	RBC and BDC are preparing separate Core Strategies. Following the revocation of Regional Strategies RBC is reconsidering its housing need and the need for cross-boundary development.	Continue to progress Core Strategy and Evidence Base.

		<p>Evidence is based on 2006 population projections with a caveat to consult again when 2008 projections are available – could this be relied on as evidence?</p> <p>Strategy states that further consultation on cross boundary issues is required once issues with RSS/Localism Bill are resolved. It is not possible to approve this strategy without the relevant information.</p>	<p>Officers recommend that the most reliable evidence will be the Strategic Housing Market Assessment due in 2012.</p> <p>Agree, further consultation will be carried out.</p>	<p>None</p> <p>Continue to progress Core Strategy and Evidence Base.</p>
R188	Pritchard	<p>RBC's slogan is a 'green and enterprising town'. If the Core Strategy goes though, Redditch will not be green anymore and if it were enterprising it would make use of existing retail and industrial units.</p>	<p>Disagree – core strategy aims to be green and to safeguard the town's green spaces and encourages improvements to the green infrastructure around the town.</p> <p>By protecting employment land, the Core Strategy encourages those buildings becoming redundant to be redevelopment for economic purposes.</p>	<p>Continue to progress Core Strategy and Evidence Base.</p>
R305	RBC/BDC Climate Change Manager	<p>Minor change to Local Portrait (pg13). Should include: – We have signed the Worcs Climate Change pledge annually since 2008</p>	<p>Noted</p>	<p>Amend wording to: "It boasts the first dwellings to have been assessed against the 'Code for Sustainable</p>

		<p>- Our investment of £200,000 in Solar PV in 2011</p> <p>- First council in the country to re-use 100% waste heat from the crematorium – diverting it to the Abbey Stadium dev providing 42% of it's annual heating demand.</p>		<p>Homes' built to Code Level 3 and has committed to participation in the Nottingham Declaration, signed in 2006, as well as the Worcestershire Climate Change Pledge signed annually since March 2008."</p> <p>"Redditch Borough Council is the first council in the country to re-use 100% waste heat generated from the crematorium, diverting it to the Abbey Stadium development providing 42% of its annual heating bill."</p>
R314	Rood	<p>Believes the future of Redditch depends primarily on:</p> <p>Improving employment opportunities</p> <p>Improving the qualifications of the workforce</p> <p>Improving educational achievement & lifting aspirations of the population as a whole</p> <p>All within an environment where</p>	<p>Agree - to reflect this there is a strong strategy on creating a borough where business can thrive.</p>	<p>None</p>

		<p>people feel safe.</p> <p>Other issues e.g. housing, recreation, entertainment, shopping, but important to prioritise and have community involvement.</p>		
R316	Halcrow	<p>In only identifying sites within Redditch, RBC is not meeting requirements of PPS12 in not considering the most appropriate strategy when considered against reasonable alternatives. Also means the plan is unable to meet the Boroughs population projections.</p> <p>Joint working can ensure decisions on infrastructure capacity and planning are more effective/efficient. Can also make the best use of scarce skills and capacity. Client's site is more suitable than locations identified in the Core Strategy, but has been ignored because it falls within Bromsgrove. This is against the advice in para 36 of PPS3 & 4.17 of PPS12</p>	<p>The Core Strategy explains that needs would have to be evidenced and met and that the core strategy would need to reflect this evidence.</p> <p>Sites located outside of the Borough may be looked at in more detail once growth levels are known and work on identifying sites continues.</p>	<p>Continue to progress Core Strategy and Evidence Base.</p>
R351 R352	Warby Warby	<p>There should be a joint working agreement for cross border development at Bordesley. Surely there must come a point</p>	<p>Redditch is unlikely to meet its need sustainably within its boundaries, hence the need for the cross boundary through the</p>	<p>Continue to progress Core Strategy and Evidence Base.</p>

		where Redditch is “full” in terms of housing – this should be accounted for in the strategy. Concerns that if housing is built within Bromsgrove but close to Redditch’s boundary Redditch will suffer and wont have the benefit of more council tax.	RSS. After this plan period it is a concern that Redditch is nearing the point where its natural limit would be reached, especially in terms of green belt policy.	
R358	English Heritage	Welcome coverage of the historic environment and heritage assets in the environment section of the local portrait. The inclusion of maps and images is a useful tool.	Noted	None
R378	WCC	Suggest a change of wording in the Local Portrait “The Borough has a rich local history evident in the 160 Grade II* and Grade II Statutory Listed Buildings and 8 Scheduled Ancient Monuments. There are also more than 1000 other heritage assets currently recorded, including buildings of ‘local interest’ which, although not statutorily listed, have features of archeological, architectural, historical or townscape significance to the borough.”	Noted	The Local Portrait will be amended to incorporate the suggestions.
R382	Redditch LSP	SCS Pg 8 - SCS priorities need updating to read “The SCS for	The SCS was updated after the Revised Preferred Draft Core Strategy was published,	Take account of amended SCS for future Core Strategy

		<p>Redditch has the following set of priorities that guide decision making:</p> <ul style="list-style-type: none"> -improving health in equalities; -raising educational attainment; -developing economic development; and -tackling areas of deprivation.” <p>Local Portrait</p> <p>Pg 17 – suggested amendment “Around 25% of the Borough’s population is under the age of 19 which is the highest in Worcestershire.”</p> <p>Pg 18 - suggested amendment “The Health Profile for Redditch 2010 (NHS) suggests that the health of people living in the Borough is generally similar to the national average but is the worst in Worcestershire.”</p>	<p>therefore these suggestions will be incorporated into future drafts of the Core Strategy.</p>	<p>revisions.</p>
R390	Blakeway	<p>Do your own investigations - do not take the words of reports from RSS and others - the government of today believes these bodies are not required and their information is not to be believed. See below - make you think they have other interests at heart doesn't it?</p>	<p>The message from Government is contained in the guidance and legislation it releases, not its press releases and public announcements – the national guidance presents a picture of a ‘pro-growth’ government and the retention of a plan led system whose contents are based upon the evidence available.</p>	<p>Continue to progress Core Strategy and Evidence Base.</p>

		Quango :- autonomous government-financed organization: an organization that is able to act independently of the government that finances it		
R391	Middleton OBO BAG	Dispute the argument that 'Bordesley is not a defined settlement' as a valid reason for why Bordesley Park is not being perused. Request that the findings of the WYG 2008 report be revisited by the Council	The statement that Bordesley isn't a formally designated settlement is a fact, however there is no suggestion in the Core Strategy about the future use of Bordesley Park as this is an area of potential growth which can be investigated once growth figures are known. The Conclusions of the WYG report are being revisited in order to update some of the findings as some of the contents are out of date.	Continue to progress Core Strategy and Evidence Base.

Transport (non- direct policy related comments)

Rep No.	Name	Summary	Officer Response	Officer Action
R030	WCC	<u>Spatial Portrait</u> Following the first paragraph relating to transport on page 14 insert the following:	Whilst some of the comments are relevant about the busway the suggested text is excessive for a	None

Rep No.	Name	Summary	Officer Response	Officer Action
		<p><i>“The segregated public transport-only routes (busways) help to ensure that the town’s local bus services can operate in an efficient and reliable way, they play a major part in increasing the commercial viability of the bus network and reducing dependence upon public subsidy (which is and will be under severe pressure over the coming years). They are therefore, critical to the continued operation of the frequent local public transport needed to support the Core Strategy’s excellent Sustainability Policies & aspirations.</i></p> <p><i>In terms of anti-social behaviour, we understand that this has been reducing in response to measures to open up some of the problem areas, by tree cutting and vegetation management, to make them less attractive to trouble makers. The fact that evening bus services have been re-introduced has become established is</i></p>	<p>description of the Borough for the local portrait. The first paragraph is dominated already by the issues created by the busway and it wouldn’t be helpful to add further detail.</p> <p>The perception of anti social behaviour has remained constant however it is helpful that some Council initiatives are assisting with this, but the description about the perception that un-active areas create remains valid.</p>	None

Rep No.	Name	Summary	Officer Response	Officer Action
		<p><i>indication the strategy appears to be working. Certainly have has very little reported in the last year or two."</i></p>		
		<p><u>Spatial Portrait</u> Following the second paragraph relating to transport on page 14 insert the following: <i>"Use of rail services to/from Redditch has increased significantly during LTP2 period (2005-2010), with a 13% growth in passenger numbers between 2005 and 2008. Nearly 850,000 passengers use the station each year.</i></p> <p><i>Redditch's local bus network is also performing well, with over 4.5 million passengers per annum (representing over 25% of Worcestershire's total bus demand). The Redditch New Town busways and other priority measures help to increase the efficiency and use of the Redditch</i></p>	<p>Agreed</p> <p>Don't need to repeat information about Redditch busways as this is already included in the portrait but agree to include information about the passengers on busses.</p>	<p>Amend spatial portrait to read <i>"Use of rail services to/from Redditch has increased significantly during LTP2 period (2005-2010), with a 13% growth in passenger numbers between 2005 and 2008. Nearly 850,000 passengers use the station each year."</i></p> <p>Agree to include <i>"Redditch's local bus network is also performing well, with over 4.5 million passengers per annum (representing over 25% of Worcestershire's total bus demand)."</i></p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p><i>bus network and reduce the level of subsidy required to maintain the appropriate level of service. This is important during a period when the ability of the public sector to subsidise non-commercial bus routes will be severely curtailed.</i></p> <p><i>In terms of journeys to work, Redditch has a higher percentage of journeys made by public transport than other parts of Worcestershire (nearly 11% of motorized mode shares). This provides an excellent base from which to build sustainable growth and highlights the benefit of planning for public transport from the outset of the development process."</i></p>		<p>And</p> <p><i>"In terms of journeys to work, Redditch has a higher percentage of journeys made by public transport than other parts of Worcestershire (nearly 11% of motorized mode shares). This provides an excellent base from which to build sustainable growth and highlights the benefit of planning for public transport from the outset of the development process."</i></p>
		<p><u>Transport Map</u> Page 15: Transport map should show local bus network.</p>	<p>This is too volatile and subject to change</p>	<p>None</p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<p><u>Spatial Portrait</u> Following the fourth paragraph relating to housing on page 18 insert the following: <i>“Redditch is forecast to have a significant increase in the population aged over 65 (+ 58% from 11,500 – 18,200) during the period of the persons will have an impact on the demand for services provided to older people. Consequently there will be a degree of public demand to provide access to these services. This shift in the population age structure will present several transport-related challenges in meeting the demands of the ageing society:</i></p> <ul style="list-style-type: none"> • <i>Access to the passenger transport network</i> • <i>Safety on the transport network</i> • <i>Mobility and independence</i> • <i>Access to key services and facilities</i> • <i>Inclusion within society”</i> 	<p>Cannot be specific about population statistics as they are volatile in Redditch. However the age shift and the issues this creates are relevant.</p>	<p>Add to spatial portrait</p> <p><i>“This shift in the population age structure will present several transport-related challenges in meeting the demands of the ageing society:</i></p> <ul style="list-style-type: none"> • <i>Access to the passenger transport network</i> • <i>Safety on the transport network</i> • <i>Mobility and independence</i> • <i>Access to key services and facilities</i> <p><i>Inclusion within society”</i></p>

Rep No.	Name	Summary	Officer Response	Officer Action
		<u>Key Diagram</u> The Key Diagram (page 24) should include key elements of the bus network.	This is too volatile and subject to change	None

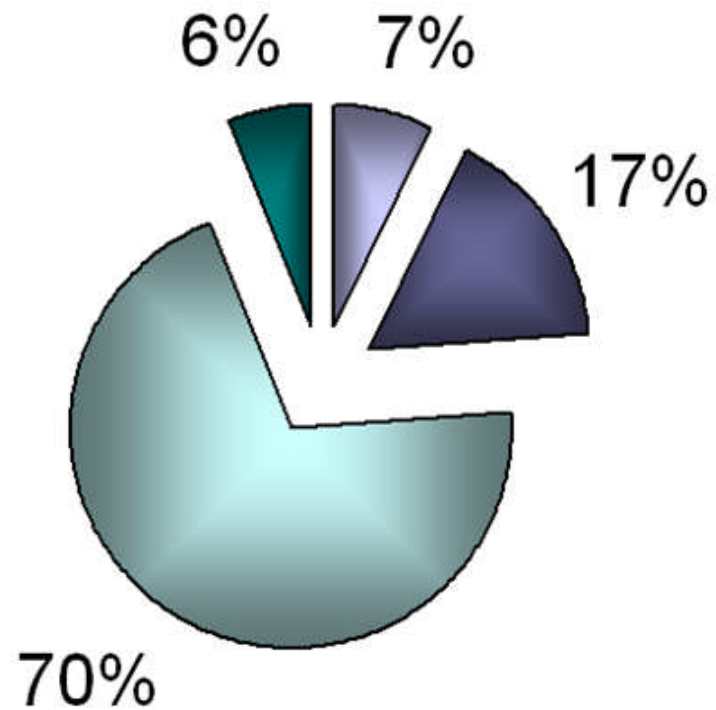
Appendix 2

Rep No.	Name	Summary	Officer Response	Officer Action
R094	CPRE	Comments relating to the status of various sites within the Appendix	Appendix 2 – Housing sites will be updated for the next draft of the Core Strategy. However, it must noted that this represents a snap shot in time and will be out of date as soon as new monitoring takes place. Therefore, reliance should be placed on the Housing Monitoring documents in preference to the Appendix in the Core Strategy	None
R125	Barton Willmore	<p>The table in Appendix 2 does not identify adequate sites to meet the housing target of 3200 dwellings</p> <p>There is no housing trajectory as advocated in PPS12</p> <p>The Council is proposing 170 dwellings on windfall sites, however there is no indication of</p>	<p>This issue is more readily addressed under Policy 8 – Housing Provision</p> <p>Housing monitoring documentation contains an annually updated housing trajectory. This would be more useful than one within a Core Strategy document, which merely presents a snap shot in time</p> <p>Explanation of the windfall assumption is detailed in the SHLAA</p>	<p>None</p> <p>None</p> <p>None</p>

		<p>when these will be achieved. PPS3 advises that windfalls should not be included in the first 10 years of the plan period. Where sites can be identified, it is preferential to rely on identified sites rather than windfalls. The 170 windfall allowance should be replaced with a site at Webheath ADR for approximately 275 dwellings</p>		
R129(A)	Persimmon Homes	Query capacity of Brockhill West (Foxlydiate Green Belt) 150 dwellings not 230?	Capacity altered to allow for some employment provision on this site	None
R129(B)	Persimmon Homes/ Miller Homes/ S&RD	Consider that the windfall allowance should be reduced as it should only apply to year 11 onwards following adoption of the plan and not from 10 years from the operative period of the plan commencing to comply with PPS3. The above comments would result in a lower overall capacity within the Borough	This is the case. See SHLAA for details	None

Q8) We asked:

What do you classify as your neighbourhood?



■ Ward ■ Village/Town ■ District ■ Other

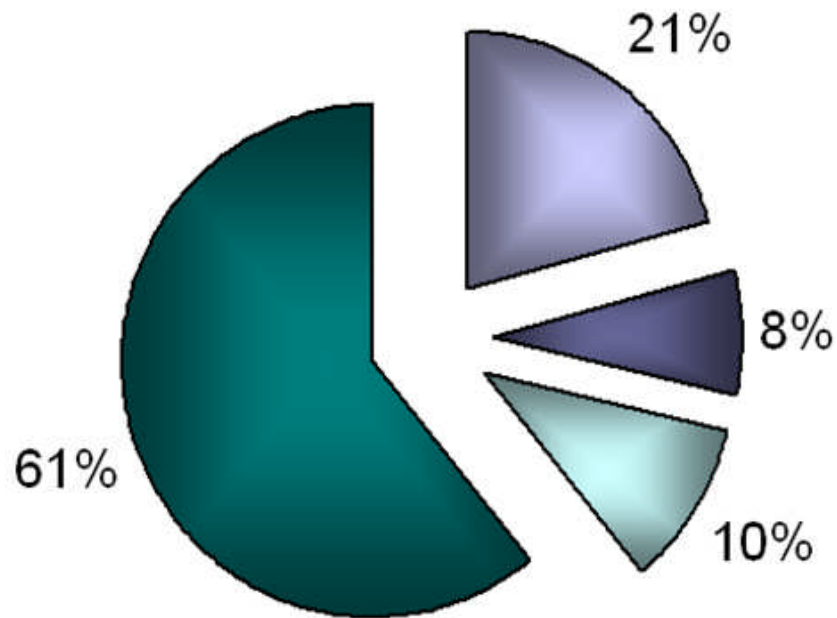
*Other included: Our road, the urban area, any area that affects/is affected by another

Q9) We asked: What is the best method for encouraging community groups to become more involved in local decision making?



Q13) We asked:

Where did you hear about this consultation opportunity?



■ Letter/Email ■ Online ■ Consultation Event/Public Meeting ■ Other

* Other included: Action group flyers, liaison with RBC Officers & word of mouth