



# Narrative on the **Site Selection Process for the Growth Areas at Redditch**

January 2016

Prepared jointly by  
**Bromsgrove District Council and  
Redditch Borough Council**



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**Please note: Where summaries of various documents are provided these sections do not seek to replicate all of the analysis and conclusions they purely seek to summarise the process that has been followed.**

## 1. INTRODUCTION

- 1.1 Bromsgrove District Council and Redditch Borough Council have prepared local plans which are presently undergoing an Examination in Public. Both Plans cover a 19 year period from 2011 to 2030 and seek to meet the development needs of the area. But it has long been recognised that Redditch may need to expand into the neighbouring authority areas of either Bromsgrove or Stratford or both, which has necessitated cross boundary working.
- 1.2 A very considerable amount of work has been carried out to examine suitable sites which can accommodate the growth of Redditch. Studies into the possible expansion of Redditch have recognised the north and west sides of the town offer the best opportunity for expansion: these are areas which fall within Bromsgrove District. Under the Duty to Co-operate both Councils have worked together to address the development needs of Redditch (please see section 6 and appendix h for further details on the DTC). This has culminated in the use of ADR land previously removed from the Green Belt to meet long term development needs of Redditch and two very large cross boundary allocations: one to the north of Redditch at Brockhill (600 units) and the other to the west of Redditch at Foxlydiate (2800 units).
- 1.3 This work culminating in the selection of these sites and the rejection of others has taken place over nearly a decade. The work has been extensive and is contained in a wide range of reports and assessments including housing growth reports and sustainability appraisals assessments. It is recognised that the extent of information available might appear overwhelming and the process difficult to explain, particularly as it is difficult for each new report to summarise the full extent of what has preceded it.
- 1.4 This document seeks to bring together all of that work and describe and summarise it in a single narrative. The Inspector examining the Borough of Redditch Local Plan No.4 and the Bromsgrove District Plan has encouraged and supported the production of this narrative which is designed to assist in explaining, in one single document,
- the full process which has been followed by the two Councils since 2007; and
  - the methodology by which all the Areas have been examined;
  - the reasons the proposed allocated sites have been selected; and
  - the reasons why other Areas have not been selected

## **2. THE PROCESS EXPLAINED**

### **Redditch: A New Town in the Green Belt**

- 2.1 Redditch is a New Town. Historically there has always been a modest settlement in the Redditch area. But it was identified as a suitable location for significant growth in the form of a 1960's New Town. The Town was carefully planned to encourage a mixture of significant new housing and employment, but also with generous open space which is its key defining feature as a settlement.
- 2.2 Redditch's urban area is surrounded by Green Belt in all directions, making any decisions about future expansion challenging in terms of town and country planning. Any significant growth clearly requires the use of Green Belt land, except for the three areas of land which had been identified as suitable for development in the Borough of Redditch Local Plan No.2 (BORLP2), which was adopted in February 1996. These three areas were removed from the Green Belt under exceptional circumstances to meet the long term development needs of the town and are designated as Areas of Development Restraint ("ADR") in BORLP2.
- 2.3 These areas were not required to meet the development requirements for the subsequent Borough of Redditch Local Plan No.3, which was adopted in May 2006. There were no exceptional circumstances which would justify returning this land to the Green Belt. It has therefore remained as undeveloped land, removed from the Green Belt to meet the longer term needs of the town as and when the need should arise.
- 2.4 By the mid 2000's however, the latest household projections suggested that Redditch would need to significantly expand to meet its housing needs. This was then carried forward in the Review of the West Midlands Regional Spatial Strategy (WMRSS) and was reflected in early Core Strategy preparation by both Councils. However, the revocation of the WMRSS along with its embedded housing requirement and the introduction of the NPPF have led to the identification of locally derived Objectively Assessed Housing Needs for the two Local Plans which are presently the subject of the Examination in Public. Section 4 of this document provides more detail of this process.
- 2.5 Although predominantly a New Town, the Borough of Redditch does contain significant areas of undeveloped Green Belt land to the south and south west of the urban area, extending out for several miles to the village of Feckenham and beyond. But these areas are on the opposite side of the town from the Town Centre, which is located much closer to the northern edge of the Town. Expansion southwards is therefore difficult to reconcile with the principles of sustainable development, especially in terms of locational sustainability, and the need to focus and support the Town Centre as a key feature of the Town, including assisting in its regeneration.

## **The Early Stages of Plan Preparation**

### **Bromsgrove Sustainability Appraisal Scoping Report 2004- 2007 (July 2005) [CDB 3.9]**

- 2.6 The Bromsgrove District Local Plan was adopted in January 2004. Work on Bromsgrove Core Strategy began shortly thereafter in 2004 (published in 2005) with the preparation of the Sustainability Appraisal Scoping Report, Statement of Community Involvement and other evidence gathering. Redditch cross boundary growth had not been identified as an issue at this time.

### **Bromsgrove Issues and Options 2005 (June 2005) [CDB 2.1]**

- 2.7 A range of core issues were identified and consulted upon during 2005 using a range of consultation techniques. Each core issue presented had a set of alternative options presented as possible solutions to the issues. The key issues and options identified were Locations for Growth; Housing for Everyone; Rural Life; the Local Economy and Creating Jobs; Shopping and Bromsgrove Town Centre; Learning, Leisure and Improving Health; Our natural Environment; Getting Around and Preserving the Past. Again, Redditch cross boundary growth had not been identified as an issue at this time.

### **Bromsgrove Issues and Options Consultation update (July 2007) [CDB2.2]**

- 2.8 This consultation was carried out as further key issues and options had been identified since 2005, including new housing growth; climate change and renewable energy; flooding; waste and recycling and biodiversity.

Issues around new housing growth had changed in the intervening period due to the revised context of the WMRSS which were also explained.

### **Redditch Sustainability Appraisal Scoping Report / Evidence Gathering (October/November 2007) [CDR 3.16]**

- 2.9 Work on Borough of Redditch Local Plan No.4 (BORLP4) began in June 2007 with the preparation of the SA Scoping Report [CDR3.16] and other evidence gathering. In order to frontload the process of preparation, consultation bodies and the wider community were involved through informal consultation in the refinement of aspects of the Core Strategy Issues and Options Document and helped to formulate the Issues. Consultation was also undertaken at an early stage through a series of topic based citizen and stakeholder panels, neighbourhood group meetings etc.

### **Joint Study into the Future Growth Implications for Redditch Town to 2026 (December 2007) (WYG1) [CDX 1.5]**

- 2.10 After the BORLP3 was adopted in May 2006 work began on examining the future expansion of the Town to meet the increase in new homes arising from the Government's latest household projections of the time, and reflected in the work on the partial review of the WMRSS. In 2007 a report by White Young Green was jointly commissioned by Worcestershire County Council, Redditch Borough Council and neighbouring district authorities of Bromsgrove and Stratford. The report dated December 2007 is entitled "Joint Study into the Future Growth Implications of Redditch Town to 2026." (WYG1) This report

represents the important starting point for the work leading up to the present draft local plans for both Redditch and Bromsgrove.

- 2.11 The WYG1 report sets out the rationale for some of the important early decisions which were made about the need to:
- accommodate significantly new housing and employment land at Redditch;
  - utilise existing urban capacity;
  - utilise land already removed from the Green Belt to meet the longer term needs of the town (ADR);
  - safeguard public open space which is the key defining feature of the town.
- 2.12 The work recognised that despite the use of spare urban capacity and ADR land there was likely to be a need for the Town to expand into the Green Belt under two of the three future growth scenarios emanating from the partial review of the WMRSS. Since the growth arises from the needs of the Town itself, it became necessary to examine the land around Redditch for suitable locations for growth. As part of their work a full 360 degree search of the land around the Town was carried out by White Young Green, breaking down the entire circumference to 21 different areas. This included examining ADR land and the two key areas of open space on the periphery of the town (namely Arrow Valley Park and Morton Stanley Park).
- 2.13 A SWOT (Strength, Weakness, Opportunities and Threats) analysis was carried out of all 21 areas. These areas were then grouped into four quadrants based on compass points (NW, NE, SE and SW) (see map at appendix f). Initial conclusions suggested that proximity to Town Centre, public transport accessibility, landscape and utility constraints were key considerations in terms of the differentiation between areas, in addition to the Green Belt purpose of separating towns. This initial work was not conclusive about the most appropriate areas of Green Belt which should be utilised for the expansion of the Town, but it was clear even at that stage that the northern and western edges of the Town looked to have more potential given their close proximity to the Town Centre and good public transport accessibility. These areas fall within Bromsgrove District.
- 2.14 Just before the WYG1 report was published, the Borough Council received clarification on the appropriate scale of growth for the Town for the period 2006 to 2026. Simply in terms of meeting its own needs, the requirement for Redditch was identified as 6,600 dwellings: as set out in the Addendum to the report (page 41). It was recognised that this level of growth necessitated the removal of significant areas of land from the Green Belt to meet future development needs, in addition to land already removed from the Green Belt at Brockhill and Webheath for that very purpose (i.e. the ADR land). Further work since 2006 has continued to focus on this scale of development for Redditch, reinforced by the more recent household projections and work on an appropriate Objectively Assessed Need (OAN).
- 2.15 This important initial work was critical in bringing together Bromsgrove District Council and Redditch Borough Council to examine possible ways of accommodating the future growth of Redditch. When legislation was put in place to abolish the WMRSS in 2010, that method of joint working was replaced by the statutory Duty to Co-operate contained in the Localism

Act 2011. Both Councils recognised the importance of joint working under the Duty to Co-operate, especially given the conclusions of WYG1 produced in 2007. This is evident in much of the work from 2008 onwards.

**Bromsgrove Sustainability Appraisal Scoping Report update 2008- 2011 (August 2008)  
[CDB 3.8]**

- 2.16 The WMRSS was discussed in terms of Redditch cross boundary growth issues and need for 3,300 homes in either Bromsgrove and/or Stratford on Avon Districts.

**Redditch Issues and Options Consultation (May/June 2008) [CDR 1.18]**

- 2.17 The Issues and Options Document was subject to consultation alongside a draft SA Report between 9 May 2008 and 20 June 2008. The old Regulation 25 of the Town and Country Planning (Local Development) (England) Regulations 2004 required consultation on an Issues and Options Document, which proposed the key Issues for Redditch Borough and options to resolve those issues, as well as a draft Vision and Objectives.

- 2.18 The Issues and Options document was based on the review of plans, policies and programmes and baseline information in the Scoping Report, as well as ongoing informal consultation and evidence gathering. In relation to housing growth locations, the Issues and Options document had a set of alternative options which were:

- **Option 1** - Focus development in the most sustainable location in the Borough; the Town Centre
- **Option 2** - Identify areas in the urban area of Redditch in need of regeneration and focus development in key regeneration areas
- **Option 3** - Priority for development on brownfield land in the urban area
- **Option 4** - Rebuilding existing urban areas of poor quality with land efficient buildings
- **Option 5** - In some other way

- 2.19 Each of these options was assessed in the accompanying SA Report to give an indication of the sustainability performance of the different Options to ensure that the Preferred Draft Core Strategy was as sustainable as possible. Those options progressed had the least negative effects on environmental factors and most positive effects for socio-economic factors, as well as reflecting the overall Plan strategy and being capable of delivery over the Plan period.

**Bromsgrove Draft Core Strategy 1 (2008) October 2008 [CDB 2.3]**

- 2.20 This version of the Plan formally raised the issue of cross boundary growth for Redditch's needs for the first time. In terms of a potential location for Redditch's needs the key diagram indicated a broad flexible arc of potential land adjacent to the boundary north and west of Redditch Town. Policy CP15 'Cross Boundary Growth' explained the background to this issue.

**The Study into the Future Growth Implications of Redditch Second Stage Report (WYG2)  
(January 2009) [CDX 1.4]**

2.21 This study attempted to identify the “preferred option” for future housing development in and around Redditch. It was commissioned by Bromsgrove, Redditch and Stratford on Avon District Councils, Worcestershire County Council and the West Midlands Regional Assembly but was both time and resource limited and prepared with different growth levels in mind. The findings of the report were discussed in the WMRSS Phase 2 revision Examination in Public process in April 2009 but many of its key conclusions such as the optimum location for growth and the return of ADRs to Green Belt were not expressly rejected by the Panel, as documented in the Panel Report dated September 2009 [CDR 6.6a] (see below). However, some of the research conducted in this Study does remain valid, for example, in relation to Redditch’s open space.

**Redditch Preferred Draft Core Strategy (October 2008 – May 2009) [CDR 1.17]**

2.22 The 2007 Sustainability Appraisal Scoping Report and comments received during consultation on Issues and Options helped to formulate the Preferred Draft Core Strategy which was subject to an ongoing consultation between 31st October 2008 and 8th May 2009. The Preferred Draft Core Strategy presented the Borough Council's most appropriate policy options after consideration of the context and all implications, in order to resolve the key planning issues in Redditch Borough. Housing provision was focussed on the identified capacity within the Borough at that time (2,243 dwellings). The options considered were:

- **Option 1** - Focus development in the most sustainable location in the Borough; the Town Centre
- **Option 2** - Identify areas in the urban area of Redditch in need of regeneration and focus development in key regeneration areas
- **Option 3** - Priority for development on brownfield land in the urban area
- **Option 4** - Rebuilding existing urban areas of poor quality with land efficient buildings
- **Option 5** - Business as Usual / Do nothing

2.23 A combination of Options 1 – 4 was chosen as an appropriate approach to accommodating development within the Borough, reflecting the focusing of development in the most sustainable location and the use of previously development land.

2.24 In light of the findings of WYG2 [CDX1.4], that the ADRs at Brockhill, Webheath and the A435 corridor were not considered suitable for development, the Preferred Draft Core Strategy proposed they should be designated as Green Belt. However, the conclusions of WYG2 were not accepted by the Councils after the independent panel of experts who considered the WMRSS Phase 2 review concluded there was a need to make use of the Redditch ADRs.

**West Midlands Regional Spatial Strategy Panel Report (September 2009) [CDR 6.6a]**

2.25 The WMRSS Panel Report was published in September 2009. The Panel Report recommended that Redditch Borough should aim to provide for 7,000 new dwellings in the period up until 2026, of which 4,000 dwellings were to be provided within the Borough, and 3,000 dwellings within the District of Bromsgrove adjacent to Redditch's boundaries.

2.26 The WMRSS Panel Report stated (para 8.84) that “...the choice of locality around the boundary of Redditch should be locally determined whether at or adjacent to the

*Webheath/Foxlydiate or Brockhill ADRs or in the Bordesley Park area or in some combination of these possibilities or elsewhere.”*

- 2.27 The WMRSS Panel report concluded that there were no valid reasons to return ADR land to Green Belt and that they should continue to be identified for the future development needs of Redditch. *“Taken overall, we can see no good reason to reverse the conclusions of the October 2008 Study which identified potential use of parts or all of the various ADRs in Redditch and gave a housing capacity of over 4,300. Certainly, we cannot see any new exceptional circumstances in PPG2 terms to justify now deciding to put the ADRs into the Green Belt”* (Para 8.82).
- 2.28 **Bromsgrove and Redditch Joint Consultation (February/March 2010) [CDX 1.3]**
- The implications of increasing Redditch’s to around 4,000 dwellings from the Redditch Borough Council evidenced capacity of 2,243 dwellings presented in the Preferred Draft Core Strategy meant that due to limited capacity and increased requirement that the preferred development strategy needed to be changed. During February - March 2010 Redditch Borough Council consulted jointly with Bromsgrove District Council on cross boundary growth options in Bromsgrove District, a change to Redditch's development strategy and development options within the Borough boundary.
- 2.29 The following options were put forward for the expansion of Redditch cross boundary whilst also inviting suggestions in the consultation for other potential areas in the District or Borough to meet this need:
- East of A441 (Birmingham Road)
  - West of A441 (Birmingham Road)
  - Adjacent to A448 (Bromsgrove Highway)
- 2.30 Due to the requirement in the WMRSS report, the options for the expansion of Redditch cross boundary were all adjacent to the boundary of Redditch. The options were not specific site boundaries at this stage, and the Councils were considering developing variations of the options as well as the sites individually.
- 2.31 The development strategy options and development options within the Borough’s boundary were:
- **Option 1** - Focus development in the most sustainable location in the Borough; the Town Centre
  - **Option 2** - Identify areas in the urban area of Redditch in need of regeneration and focus development in key regeneration areas
  - **Option 3** - Priority for development on brownfield land in the urban area
  - **Option 4** - Rebuilding existing urban areas of poor quality with land efficient buildings
  - **Option 5** - Business as Usual / Do nothing
- 2.32 There were no suitable alternative options presented to the Borough Council at Issues and Options consultation stage. New options to consider in policy which have emerged from consultation:
- **Option 6** - Identify Area of Development Restraint (ADR) land to meet development needs beyond 2026
  - **Option 7** - Add existing ADR land to Green Belt designation

- 2.33 Options 1 - 4 were taken forward, these being considered to provide a reasonable balance between focusing development on the existing urban area and accommodating new development over the longer term. Option 6 was also taken forward as a reasonable planning strategy to provide for future development needs. Options 5 and 7 were not considered reasonable.

**Redditch Revised Preferred Draft Core Strategy (January/March 2011) [CDR 1.16]**

- 2.34 The Revised Preferred Draft Core Strategy proposed that 3,200 dwellings were provided in the Borough between 2006 and 2026. Options 1 - 4 were taken forward within the Revised Preferred Draft Core Strategy because they were considered to provide a reasonable balance between focusing development on the existing urban area and accommodating new development over the longer term. The principle of accommodating growth on one or more large sites was explored in WYG1. Option 6 was also taken forward as a reasonable planning strategy to provide for future development needs, namely land at Webheath and in the vicinity of the A435.

**Bromsgrove Draft Core Strategy 2 (DCS2) January 2011 [CD2.4]**

- 2.35 The cross boundary issue was not addressed in this version of the Core Strategy as RBC was not promoting growth above that which could be accommodated within the Borough. For various reasons cross boundary working was put on hold in 2011.

**Bromsgrove Sustainability Appraisal Scoping Report update 2012- 2015 [CDB 3.7]**

- 2.36 Redditch cross boundary growth was again discussed together with the relevant evidence base.

**National Planning Policy Framework (March 2012) [CDB 5.1/ CDR 6.1]**

- 2.37 Following the introduction of the National Planning Policy Framework (NPPF) in March 2012, and the subsequent abolition of the WMRSS in May 2013, Councils had responsibility to determine their own evidenced development requirements based on, amongst other things, objectively assessed housing need. The Councils addressed the issue of cross boundary growth to meet Redditch's development needs under the remit of the Duty to Co-operate.

**Housing Growth Development Study (January 2013) [CDX 1.1]**

- 2.38 One of the most important documents in the process of deciding where the peripheral expansion of Redditch should take place is the Housing Growth Development Study (HGDS). This was published in January 2013 and represents a very detailed examination of suitable locations to accommodate this growth. It was a product of joint working between Redditch and Bromsgrove Councils, evolving from the earlier WYG 1 report and the subsequent consultation on cross boundary growth.
- 2.39 From the WYG1 report it appeared that the most logical place for Redditch to expand was to the north and west, areas which fell within Bromsgrove District given the proximity of these locations to the town centre and other key factors such as public transport accessibility, topography and landscape impact. But when examining the future expansion of the town, the entire circumference of the urban area was examined. That meant peripheral expansion was considered in

- Redditch Borough (SW direction);
  - Bromsgrove District (NW and NE direction); and
  - Stratford District (SE direction)
- 2.40 The HGDS describes how Redditch and Bromsgrove approached the task of selecting the most suitable sites for growth around Redditch, based on an exhaustive search of all 21 of the areas first identified in the WYG1 Report. ADR land and the two large open space areas within the town were also examined despite earlier conclusions made about the obvious suitability of the former and the unsuitability of the latter to accommodate housing growth.
- 2.41 Given nearly all of the land around Redditch’s urban area is Green Belt, the work included looking at suitable boundaries to mark the new edge of the Green Belt, with detailed consideration given to roads and other features that might provide suitable definition.
- 2.42 **The process began with a reconsideration of the issue of using existing open space in Redditch, concluding as before that it would not be appropriate to place housing on these important features which contribute to the locally distinctive nature of the urban form of Redditch, and is one of the pillars of the original Redditch New Town Masterplan.**
- 2.43 The process also involved reconsideration of the issue of using ADR land, despite the fact the land has always been identified as suitable to meet the future development need of the town.
- 2.44 The HGDS considered all of the potential locations surrounding Redditch’s urban area. The first stage of WYG1 provided the basis for this work and identified sites around Redditch to be analysed for growth potential. All 21 of these potential sites around the full compass of Redditch were re-appraised against the ‘Area Assessment Principles’ set out in Chapter 4 of the HGDS, providing an explanation of the various issues and constraints associated with each Area.
- 2.45 Firstly, a number of Areas were discounted before the ‘Broad Area Appraisal’ Stage. Initially a new settlement to be located in the vicinity of Feckenham was discounted for a number of reasons including implications for accessibility, infrastructure and impact on rural setting grounds. Other Areas adjoining the urban area of Redditch were discounted before the ‘Broad Area Appraisal’ stage due to their designations as important sport and recreation open spaces. Options discarded at earlier stages do not have to be revisited at every subsequent stage: *St Albans City and DC v SSCLG* [2009] EWHC 1280 (Admin). But it should be noted from the outset, that the Inspector requested the Council to provide more detail about these initial decisions to exclude the Areas on the edge of Redditch (3a and 7) and provide detail on the performance of the Areas against the SA sustainability criteria. He also requested the ADR sites be examined through the HGDS and SA process. All of this has now been done (as set out below). As is made clear from the HGDS these Areas were considered as part of the Area assessment process, but the level of detail was not comparable with other Areas.

- 2.46 Following initial discounting, the work on the 'Broad Area Appraisal' led to recommendations on those areas to either be discounted or carried forward to the 'Focussed Area Appraisal' stage and considered for more in-depth analysis.
- 2.47 As stated above a number of the Areas were discounted at the 'Broad Area Appraisal' Stage. The most significant issue which ruled out the majority of the Areas at this stage was the distance from Redditch Town Centre. It was considered that a number of the Areas were so inaccessible and far away that there would not be any economic benefits for the Town Centre. Another significant issue which rules certain land out at this stage was the significance of the Green Belt in preventing the coalescence of Redditch and Studley (in Warwickshire County and Stratford-on-Avon District). Other reasons for discounting Areas at this stage included distance from local facilities, harm to the setting of the historic environment and risk from flooding. As stated above the most important and strategic reasons for discounting Areas at the 'Broad Area Appraisal' Stage were inaccessibility and proximity from the Town Centre and Green Belt harm. Areas that were not discounted at this stage were carried forward to the 'Focussed Area Appraisal' Stage.
- 2.48 The 'Focussed Area Appraisal' stage considered all of the Areas not initially discounted or rejected at the 'Broad Area Appraisal' Stage. The 'Focussed Area Appraisal' considered the Areas using the Area Assessment Principles and further evidence. The 'Focussed Area Appraisal' section also identified a defensible Green Belt boundary, as well as the most appropriate sites for development within the Focussed Areas. Strong and weak boundaries were identified, and various photographs and maps have been included within the HGDS to demonstrate the results of this detailed site work. The proposed boundaries suggested for each Area show the most suitable sites for development within each Area. The sites suggested are based on a combination of reasons including strong defensible Green Belt boundaries, which parcels of land are capable of containing development in Green Belt terms and which perform the best when assessed against the Area Assessment Principles.
- 2.49 The detailed discussion surrounding the outcomes of the 'Focussed Area Appraisal' work concludes that Areas 4 and 6 are the Areas which most sustainably deliver the required amount of development and associated infrastructure with the least negative impacts

**Housing Growth Sustainability Appraisal (January 2013) [CDB 3.1/ CDR 3.2]**

<http://www.bromsgrove.gov.uk/media/748733/HGSA-Full-Report-document-21-03-13-corrected.pdf>

- 2.50 The HGDS report was subject to a Sustainability Appraisal (SA) the Housing Growth Sustainability Appraisal (HGDS SA). This document was produced jointly by both Councils. As stated in the chronology document submitted on 19<sup>th</sup> June 2015 to the Examination at the Inspector's request, the HGDS SA and its Addendum in 2014 is a material component of the evidence base but does not comprise the most recent SA report.
- 2.51 This document comprises an assessment of the sustainability impacts of the growth options around the edge of Redditch's urban area and supplements the HGDS. The aim of the SA was to ensure that the principles of sustainable development were fully integrated into the HGDS and the associated emerging Bromsgrove District Plan and Redditch Local Plan.

- 2.52 The SA Framework emerged from sub regional working across Worcestershire to derive a joint SA/SEA Framework which is then adapted to local circumstances as necessary. This means that broadly speaking all Worcestershire authorities have adopted a very similar SA Framework.
- 2.53 The SA process was divided into a number of key stages which followed a logical sequence as follows:
- 1) Comparison of Strategic Objectives against SA objectives
  - 2) Comparison of Area Assessment Principles against SA objectives
  - 3) Sustainability Appraisal of Redditch Growth Broad Area Options
  - 4) Sustainability Appraisal of Scenarios for Alternative Growth Locations
- Stage 1:** Comparison of Strategic Objectives against SA objectives
- 2.54 Each Strategic Objective was assessed against each of the SA objectives and it was then possible to determine which Strategic Objective performed best in terms of sustainability. All of the Strategic Objectives would have a positive outcome on development if they were met, but some are more sustainable than others.
- Stage 2:** Comparison of Area Assessment Principles against SA objectives
- 2.55 Each Area Assessment Principle was assessed against each of the SA objectives to determine which Strategic Objective performed best in terms of sustainability. All of the SA objectives achieved an overall positive score, due to the constructive nature the principles were designed to have on sustainability.
- Stage 3:** Sustainability Appraisal of Housing Growth Broad Area Options
- 2.56 In order to better understand the implications of the Redditch Growth options, a Sustainability Appraisal of each of the Areas needed to be undertaken. For clarity, an SA was undertaken on the following Areas: 1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 19 and 20. Areas 3a, 7 and 18 were not fully assessed at that stage as they were either designated as Areas of Development Restraint (sites already removed from the Green Belt to meet longer term development needs), or important public open space. Areas 3 (including Webheath ADR) and 18 were however later assessed in the Addendum to the HGDS and the HGDS SA [CDX1.47]. The outcomes from each of the assessed Areas were compared against each other. This assessment assisted in the decision making process to determine which of the identified Areas around Redditch's urban area would deliver the most sustainable form of development for future growth. Guidance provided at the time stated that the SA should aim to improve on the effects of the existing saved Plan. To ensure the effects of the Plan are improved on, options such as 'no plan' and 'business as usual' were therefore explored. It was considered at that time that if growth needs were not met it would be unlikely that the Development Plans of either Authority would be found sound by an Inspector. Without up-to-date Development Plans there would be a great deal of uncertainty which may lead to unsustainable forms of development being implemented.
- 2.57 From assessing each Area against the SA objectives, it was indicated that a number of potential development Areas would have a negative impact in sustainability terms or just have a neutral effect. It was considered that these Areas (1, 2, 9, 10, 11, 13, 16, 17, 19 and 20) could, together with other evidence, be discounted without any further consideration. Areas 3 (not including ADR), 10, 12, 14 and 15 achieved positive scores in sustainability terms but were not considered further because in most cases there was a fundamental reason that made the Areas unsuitable for further consideration which could not be fully expressed within a simplistic SA scoring matrix.

2.58 The remaining Areas (4, 5, 6, 8 and the reduced area of 11) were considered to be the most sustainable in social, environmental and economic terms and were therefore considered in more detail.

**Stage 4: Sustainability Appraisal of Scenarios for Alternative Growth Locations**

2.59 In order to achieve the required unmet housing requirement of 3,400 dwellings it was found that due to identified developable areas and estimated capacities, a single Area would not be capable of delivering the required level of housing and therefore a combination of Areas would be required. As the Broad and Focussed Area Appraisals indicate, Areas 4, 5, 6, 8 and the reduced Area 11 were considered further.

2.60 The following combinations of areas were tested:

Areas 4 and 6

Areas 4 and 5

Reduced Areas of 4 and 11 plus Areas 5 and 6

Areas 6 and 8

2.61 These scenarios were considered to represent a reasonable variety of alternatives to address the scale of need required. Further permutations were not tested as the HGDS and SA work had revealed the best individual Areas. The evidence produced is considered to be proportionate. These combinations were tested for transport modelling work (as referenced in Chapter 9 Infrastructure Capacity) to test what effect development would have on the highway network by concentrating it at different locations i.e. either side of the A448 (Areas 4 and 5); spread in a north western arc across 4 areas (reduced Areas of 4 and 11 plus Areas 5 and 6); concentrate to the north (Areas 6 and 8) or at different, non-connected locations (Areas 4 and 6).

2.62 As all of the most suitable Areas were taken to the Focussed Area Appraisal stage, all of the combined Area scenarios also achieved an overall positive score against SA objectives. However, there were still variances in performance against each scenario.

2.63 The purpose of the SA is therefore as a tool in the site selection process to inform decision making. Decisions made typically consider the results of the SA process but are not driven by it; other higher level policy objectives may take more prominence in decision making as is illustrated above. The SA therefore has some limitations in terms of the final decision making process due in part to it being of necessity based on a simple and rudimentary scoring system in which it is difficult to properly address some planning judgments such as the degree to which an Area is close to the town centre but physically and lacking good connectivity with the urban area (Area 8) and especially the clear need to use land not in the Green Belt which is suitable for development when most land around Redditch is in the Green Belt (Areas 3R and 18). Therefore whilst the SA process is useful it not sophisticated enough for decisions to be based purely on its outcome. Section 9 discusses each of the sections in the HGDS.

**Please note: This summary does not seek to replicate all of the analysis and conclusions that is contained in the full document which can be found in the link below.**

**Documents since Submission of the Local Plans in 2013**

**Bromsgrove District Plan Proposed Submission Track Changes (February 2014) [CDB 1.2]**

<http://www.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/the-emerging-bromsgrove-district-plan-2011-30/core-documents/1-bromsgrove-district-plan-key-submission-documents.aspx>

- 2.64 Whilst the work was being undertaken for Redditch's SA, Bromsgrove District Council took the opportunity to update its Sustainability Appraisal (SA) to check the consistency of the Bromsgrove SA with the revised Redditch SA work and the SEA Directive. This version of the Bromsgrove District Plan Proposed Submission Track Changes was sent to the Planning Inspectorate as the updated submission version of the Plan. It included tracked changes which were inserted following representations period for the Bromsgrove Proposed Submission Plan [CDB 1.1].
- 2.65 There are some updates to the Cross boundary related content contained in this version of the Plan. Policy RCBD1 Redditch Cross Boundary Development and the explanatory text includes some additional text regarding the source protection zones located within Area 4 and some mitigation which development would need to achieve in order to be considered acceptable. This amendment was made in response to the assistance of the Environment Agency and Severn Trent Water prior to submission of the Plan.

**Borough of Redditch Local Plan No.4 Proposed Submission –Track changed version (March 2014) [CDR**

**1.1]** [http://www.redditchbc.gov.uk/media/733240/CD1120BORLP4\\_Submission\\_document-1-.pdf](http://www.redditchbc.gov.uk/media/733240/CD1120BORLP4_Submission_document-1-.pdf)

- 2.66 This version of the Borough of Redditch Local Plan No.4 was sent to the Planning Inspectorate as the updated submission version of the Plan. It included tracked changes which were inserted following the representations period for the Proposed Submission Plan (September – November 2013) [CDR 1.14].

**Redditch Sustainability Appraisal Refresh - 6 November 2014**

**[CDR18.23]** <http://www.redditchbc.gov.uk/media/734773/CDR-1823-Local-Plan-SA-Refresh.pdf>

- 2.67 Further work was undertaken and submitted on site selection methodology and Sustainability Appraisal. This was undertaken in response to the Inspectors Post-Hearings Note dated 3rd October 2014.
- 2.68 The purpose of this SA refresh was to have all of the necessary appraisals of the potential Areas in one place, rather than have a mixed picture of SA's being undertaken for the two Plans and independently in the HGDS SA, irrespective of which Authority the Areas fall within. Additional Area Appraisals for Area 3 (including Webheath ADR Strategic Site) and Area 18 (ADR including the A435 corridor) were undertaken in this SA Refresh on a comparable basis with other Areas selected for development. It did not at this stage include analysis of previously discounted areas (3a and 7).

**Addendum to the Housing Growth Development Study and the Housing Growth Sustainability Appraisal - 6 November 2014 [CDX**

1.47] <http://www.redditchbc.gov.uk/media/734776/CDX147-Addendum-to-the-HGDS-and-the-HGSA.pdf>

- 2.69 In the Inspectors Post-Hearings Note of 3rd October 2014, he states “*While the HGDS reviews a range of sites around Redditch, a number of alternatives were excluded from consideration at the outset of the study...However, importantly, the HGDS also excluded from consideration two areas that were in part the subject of eventual Local Plan allocations: the strategic site at Webheath (policy 48) and land including the A435 Area of Development Restraint (ADR)...I am concerned that the absence of detailed consideration of two above-noted areas from the HGDS means that it is difficult to assess why these two allocations were taken forward while other sites were rejected. Such analysis is not explicitly set out in the SA documents supporting either the HGDS or the BORLP4.*” The production of this Addendum alongside the refresh to the Redditch SA was the Councils remedy to these concerns.
- 2.70 The Addendum to the HGDS was prepared to ensure the previously discounted Areas (Areas 3R, 3A, 7 and 18) from the HGDS work were fully assessed to the same level as the existing Areas within the Study. It added additional content addressing these areas and assessing all four the sites at the Broad Area Appraisal level. It added content to the original HGDS. The same methodology was used so that all 21 Areas were assessed against the same Area Assessment Principles. Sites 3R and 18 were carried forward into the Focussed Area Appraisal. The November 2014 Addendum’s accompanying Sustainability Appraisal is also a material component of the evidence base. This assessed the Areas against the sustainability criteria adopted for the original HGDS SA. But it is important to note this is not the most recent SA Report (for the purposes of statutory compliance under s.19 (5) of the Planning and Compulsory Purchase Act 2004).

**Borough of Redditch Local Plan No.4 Sustainability Appraisal - Draft for Consultation (March 2015) [OED/39]**

<http://www.hwa.uk.com/site/wp-content/uploads/2013/10/BORLP4-Revised-SA-Report-March-2015.pdf>

- 2.71 This re-drafted version of the Sustainability Appraisal was a version published for consultation in March 2015. The redraft was undertaken by consultants AMEC for Redditch Borough Council. It involved a redrafting of the document in order to explain the evolution of the Plan and the decisions made. This included the formulation of (a) an audit of the evolution of the appraisal of the BORLP4 in respect of the reasonable alternatives considered, proposed spatial strategy and strategic allocations; (b) the re-appraisal and additional appraisal where required, of the proposed spatial strategy, proposed strategic allocations and policies; (c) remedies of certain technical errors; and (d) revision of the overall structure and presentation of the SA Report. It incorporated an update to a small number of the appraisals of the Areas through a review of the scoring mechanisms, however as this was applied consistently to all Areas, this did not change any of the outcomes in the SA.

**Borough of Redditch Local Plan No.4 Sustainability Appraisal (May 2015)**

**[OED/33a]** <http://www.hwa.uk.com/site/wp-content/uploads/2013/10/BORLP4-Revised-SA-Report-May-2015.pdf>

- 2.72 Following the consultation held in March 2015 on the BORLP4 Sustainability Appraisal - Draft for Consultation [OED/39], a final SA incorporating some changes suggested during consultation was submitted for examination. A separate document was also submitted to explain where all of the changes since the March 2015 version have arisen which is OED/33b and the outcome of consultation was submitted as OED/35. This May 2015 version of the SA is the culmination of all SA's and is the final SA for the purpose of the Examination and the qualifying document for the purposes of s. 19(5) PCPA 2004 in respect of the BORLP4. It addresses all of the Areas around Redditch including Areas 3A, 3R, 7 and 18. It also contains a comparative appraisal of all the potential development Areas including these four Areas. This SA is the final SA supporting the BORLP4, but the HGDS and its Addendum is still a material component of the evidence base.
- 2.73 This SA Report records the Council's conclusion that the Cross Boundary growth is therefore consistent with the broad evidence in the HGDS.

**Updated Bromsgrove District Plan Sustainability Appraisal (May 2015)**

**[OED/34]** <http://www.hwa.uk.com/site/wp-content/uploads/2013/10/BDP-SA-May-2015-low-res.pdf>

- 2.74 Bromsgrove District Council also produced a final SA incorporating some changes suggested during consultation on the March 2015 version of the Bromsgrove SA.
- 2.75 The BDP SA update has an identical section with the Redditch SA entitled "Cross Boundary working" in its Non-technical Summary on pages 19-23 and pages 96-100 of the main body of the report. The Inspector in his July 2015 Post-Hearings Note states that the May 2015 BDP SA provides appropriate cross-references to the relevant documentation.

### **3. SUMMARY OF THE KEY STAGES**

3.1. Chapter 2 explains the Local Plan process since 2007 leading up the present day. The key stages of that process can be summarised as follows and are discussed further in Chapters 4 to 15:

- (i) Identification of the Housing Requirement
- (ii) Urban Capacity and Policy Constraints
- (iii) Joint Working and the Duty to Co-operate
- (iv) Areas of Search and Initial Potential Growth Locations
- (v) Collection and Consolidation of the Evidence
- (vi) Area Selection Process
- (vii) Site Capacities
- (viii) Delivery and Phasing
- (ix) Consultation on Preferred Options
- (x) Submission of the Redditch and Bromsgrove Local Plans
- (xi) Initial Local Plan Examination Process
- (xii) Further Work Conducted as Part of the Examination Process

#### **4. IDENTIFICATION OF THE HOUSING REQUIREMENT**

##### **4.1 West Midlands Regional Spatial Strategy (WMRSS) Partial Review (2007)**

*“Deciding on the number of new homes to be provided for a whole region over a 20 year period is not a simple process, and nor is it an exact science where a specific ‘right answer’ will emerge as long as all the proper calculations are done.”* This was the view of the Panel who examined the WMRSS (CDR6.6a, para 3.3), whilst acknowledging the evidence base which underpins the housing requirement figure and the vast amount of additional material submitted by various parties throughout the WMRSS process.

- 4.2 The Panel Report examined the housing requirement process in great detail in Chapter 3 and concluded on the Regional requirement (para 3.87) and the District level distribution for housing (Table 3.3), which for Redditch Borough, equated to 7,000 dwellings between 2006 and 2026, of which, around 4,000 were to be provided within the Borough and around 3,000 in Bromsgrove District adjacent to the Redditch boundary.

##### WMRSS revocation

- 4.3 The change of Government in 2010 brought about the removal of the regional planning tier across England and the introduction of the Localism Act (2011) placed the responsibility for determining housing requirements on Local Planning Authorities (LPAs). However, whilst the WMRSS as a planning document was revoked, it was acknowledged that the evidence base underpinning the WMRSS process, including the housing requirement evidence, was still robust and relevant for the purpose of Core Strategy progression.

##### NPPF and locally derived Objectively Assessed Housing Need (OAHN)

- 4.4 In the wake of the Localism Act, the NPPF (2012, para 159) states that LPAs should prepare a Strategic Housing Market Assessment to assess their full housing needs, which should be based on up-to-date evidence (para 158). This meant that the evidence used to underpin the WMRSS housing requirement was now out of date and not reliable to use for local plan preparation. More up-to-date locally derived evidence was required to determine an OAHN figure for both Councils, and more specifically and with particular relevance to cross boundary development, an OAHN figure relating to Redditch Borough (CDR17.1).

##### Inspectors Interim Conclusions (17 July 2014)

- 4.5 The Inspector makes reference to the Councils’ housing needs evidence base (para 13) namely, the Worcestershire SHMA - Redditch Updated Household Projections Annex, May 2012 (CDR7.5b) and the North Worcestershire Housing Need Report, April 2014 (CDB13.3/CDR17.1), and concludes that the evidence provided a robust objective assessment of the Borough’s overall housing needs, amounting to a figure of 6,300 dwellings, which is slightly lower than the 6,400 figure planned for in BORLP4 (para 52).

##### 2012-based household projections

- 4.6 During the EiP recess, on 16 March 2015 the Inspector drew attention to the 2012-based household projections for England 2012-2037 which were released on 27 February 2015. He

invited comments from the Councils and any other interested parties on the implications of the updated figures in respect of the ongoing examinations of the BDP and BORLP4. The Councils provided a joint response stating that they acknowledged that the 2012-based household projections appeared to suggest an uplift in the number of households projected to be in each authority by 2037, which extends 7 years beyond the end of both Plan periods. It was the Councils' view that these new projections should be considered in the context of the National Planning Practice Guidance, particularly Paragraph: 016 Reference ID: 2a-016-20150227: this states that OAN assessments do not need to be updated every time new household projections are issued. Taking account of the specific guidance, as well as consideration of other guidance and policy that require development plans to be in place at the earliest opportunity, it would be untimely to fully revisit the housing assessments that have supported the Plans' progression thus far. Any reassessment at this stage would inevitably lead to a delay in the Examination and the Councils have decided to continue to rely on the previously approved figures for their respective OANs.

## 5. URBAN CAPACITY AND POLICY CONSTRAINTS

### Urban Capacity

#### WMRSS housing allocations

- 5.1 With respect to land capacity within the Borough beyond the BORLP3 Plan period, and in relation to the housing requirement, RBC responded to the WMRSS Spatial Options Consultation, when the WMRA sought views on appropriate levels of housing development across the Region. RBC's response [CDR18.6, Section H.7 pp19-37] clearly identified that the Borough's capacity constraints would limit development in the Borough to around 4,000 dwellings, relying on development of the three ADRs at the A435, Brockhill and Webheath and would require development on Green Belt land within the Borough and in other Local Authority administrative areas, in order to address the WMRSS growth options.
- 5.2 The WMRA, clearly noted and accepted RBC's capacity constraints and reflected this in the WMRSS Phase Two Draft Preferred Option [CDR18.7], and recommended a requirement of 6,600 dwellings for Redditch, 3,300 of which to be provided within the Borough and 3,300 in neighbouring districts of Bromsgrove and/or Stratford on Avon. The Panel examining the WMRSS Phase Two Revision reported that on closer consideration of Redditch's urban capacity and taking account of the ADRs and Green Belt land, Redditch was capable of accommodating at least 4,000 dwellings [CDR6.6a] p.87 and around 3,000 dwellings in Bromsgrove District adjacent to the Redditch boundary. *"We agree, however, with Bromsgrove Council that the choice of locality around the boundary of Redditch should be locally determined whether at or adjacent to the Webheath/Foxlydiate or Brockhill ADRs or in the Bordesley Park area or in some combination of these possibilities or elsewhere."* (p.194 para 8.84 WMRSS Panel Report 2009)

#### WMRSS revocation and Redditch's OAHN

- 5.3 The change to the regional planning tier and process to determine a housing requirement for Redditch has been explained overleaf. However, it should be noted that the figure of 6,400 dwellings relates to a different Plan period. The WMRSS figure of 7,000 dwellings related to a 2006 to 2026 period, whilst Redditch's OAHN relates to a 2011 to 2030 Plan period. Of the 4,000 dwelling capacity identified to inform the WMRSS process (CDR18.6), 1,085 dwellings were built during the 2006 to 2011 period. These completions were taken into account through the OAHN modelling process and are reflected in the BORLP4 housing provision policy, which identifies Redditch's remaining capacity of around 3,000 dwellings.

#### Identifying Redditch's housing capacity within the urban area

- 5.4 In 2007, the Government introduced Practice Guidance which set out how best to identify urban capacities through Strategic Housing Land Availability Assessments (SHLAA). This process has more recently been updated through the NPPG (2014). Both RBC and BDC began undertaking an annual SHLAA in 2008 and worked closely together to align their methodologies, although at this point in time there was no firm commitment that Redditch's housing capacity shortfall would be met in Bromsgrove District.

- 5.5 Following the WMRSS revocation announcement and the introduction of the SHLAA process, BDC wished to appraise the Redditch SHLAA to be sure that Redditch’s capacity had been assessed appropriately and best use of Redditch land had been made. BDC needed to be satisfied that identified growth could not be met within Redditch in order to justify use of Green Belt in Bromsgrove District adjacent to Redditch. The process of site identification (including the three ADRs) and the RBC/ BDC collaboration to assess and address the issue of accommodating unmet housing need cross boundary is detailed in the Statement of Compliance with the Duty to Cooperate [CDR1.3] (pp.15-19) (the timeline of which is included in appendix h).

#### Identifying Redditch’s other development needs within the urban area

- 5.6 Whilst the dominating issue relates to meeting Redditch’s housing needs cross boundary, RBC needs to create and maintain a balance between its various land uses to ensure that Redditch remains a sustainable location in terms of development. Alongside undertaking the SHLAA, RBC also undertakes an Employment Land Review (ELR) to ensure that sufficient land to provide jobs in balance with housing levels is maintained (CDR8.4).
- 5.7 Due to the former New Town design of Redditch’s built form, most employment development in Redditch is located in Primarily Employment Areas. This pattern of development makes it less desirable to mix employment and housing developments and necessitates the identification of large areas to accommodate employment growth. RBCs ELR was unable to identify sufficient capacity on land appropriate for employment development within the Borough. RBC has turned to its neighbours in both Bromsgrove District and Stratford-on-Avon District to accommodate its employment land shortfall.

### **Policy Constraints**

#### Green Belt

- 5.8 The key policy constraint effecting Redditch growth is the Green Belt. It both defines and constrains the Town to a very significant degree. The identified housing requirement and the identification of the urban capacity of the Town (not utilising open space) meant that use of Green Belt land was necessary. However, before deciding on the quantum of Green Belt land required, it was first necessary to consider ADR land.

#### ADR

- 5.9 It is recognised planning practice<sup>1</sup>, that where a local authority has capacity constraints and there is clear evidence that the development needs cannot be met locally, it will be necessary to consider how needs might be met in adjoining areas in accordance with the Duty to Co-operate. The assessment should consider all sites and broad locations capable of delivering five or more dwellings<sup>2</sup>, and the suitability, availability and achievability of sites including whether the site is economically viable will provide the information on which the

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<sup>1</sup> NPPG: Housing and economic land availability assessment (Guides councils in identifying appropriate land to meet development needs. ID: 3)

<sup>2</sup> NPPG: Paragraph: 010 Reference ID: 3-010-20140306

judgement can be made in the plan-making context as to whether a site can be considered deliverable over the plan period.<sup>3</sup> This is the approach adopted by RBC, through its SHLAA. It is reasonable to assume that the Duty to Co-operate process could not be successful without the local authority with limited capacity, maximising its capacity, before turning to its neighbouring authorities for help. It was clear that it would be unacceptable to have to consider making allocations of Bromsgrove Green Belt because difficult decisions have been avoided in Redditch.

- 5.10 The Redditch ADRs (Webheath, A435 and Brockhill) were designated in the BORLP2 (adopted 1996) as safeguarded land to meet possible longer term development requirements beyond 2001. RBC was able to meet its housing requirement for the BORLP3 Plan period within its administrative area without reliance on the ADRs. However, given the land capacity constraints facing the allocation of sufficient land for the BORLP4 Plan period, these three areas are now proposed allocations in the submitted BORLP4 and are located within the Redditch administrative boundary. They are not Green Belt and have been demonstrated to be sustainable sites for development in the SHLAA. The sustainability of the ADRs and the scrutiny afforded to them over the years was also acknowledged by the Inspector who held the Appeal into the Webheath ADR planning application<sup>4</sup>. The Appeal Decision Report (Feb 2014) states *“The assumption that development of the ADRs would be sustainable, in principle, has also been independently tested and confirmed on no less than three previous occasions: At the examination and modification stages of the Local Plan No.2; during the preparation and examination of the current local plan, and by the Panel examining Phase 2 of the now revoked Regional Spatial Strategy.”* (para 21).
- 5.11 The HGDS is very clear (paras 5.15 and 5.48), that the ADRs have been allocated for development in the context of the above position statement and their contribution towards meeting Redditch’s housing requirement has been taken into consideration prior to the need for cross boundary and Green Belt land investigations.
- 5.12 Whilst the Councils evaluated the A435 and Webheath ADRs in response to the Post-Hearing Note (3 Oct 2014), (Addendum to the HGDS, CDX 1.47), and in the context of the capacity assumptions made to facilitate meaningful and constructive cooperation under the Duty, it is considered that the approach adopted in the original HGDS document was correct. The Statement of Compliance with the Duty to Co-operate [CDR1.3] (Section 11 - Urban Capacity) (DTC is detailed in section 6 and appendix h), clearly states that RBC worked with BDC to ensure the capacity within Redditch was robust prior to cross boundary investigations. BDC concurred with the original RBC SHLAA conclusions (11.4), which in the case of the three ADRs, stated that these areas would be assessed by White Young Green (WYG1) [CDX1.5]. WYG1, in the Area SWOT analysis at Appendix F, acknowledges the principle of future development for the three ADRs.

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<sup>3</sup> NPPG: Paragraph: 018 Reference ID: 3-018-20140306

<sup>4</sup> Appeal Ref: APP/Q1825/A/13/2205688 Land off Church Road, Webheath, Redditch, B97 5PG

## Protected Designated Open Space

NPPF:

5.13 Paragraph 73 of the NPPF recognises that Open Space can make an important contribution to the health and well-being of Communities. Specifically, there is instruction that existing open space should not be built upon unless any of three particular criteria in the NPPF are met:

- *“an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.”*

Meeting the final two criteria is not likely given the scale of development required, and evidence referred to below makes it clear that the designated open space in Redditch protected by local policy is not surplus to requirements.

Early Plan Making Stages:

5.14 The open space provision in Redditch is around three times higher than other Districts in Worcestershire. There was recognition of the importance of high quality open spaces in this Borough. Redditch’s distinctive New Town layout incorporates a high proportion of open space which should be maintained and enhanced. As well as offering opportunities for recreation, open space can provide a valuable habitat for wildlife and provides many ecosystem services such as urban cooling. As such open space is important for the overall green infrastructure of Redditch, providing an important, multifunctional space and acting as an interface between the urban and natural environments.

5.15 At an early stage in plan making, at Redditch’s Issues and Options (2008) [CDR1.18] a question was included; *“Should Redditch continue to be distinctive with it’s higher than average standard of open space?”* The overwhelming response to the consultation was to keep Redditch distinctive and to definitely not develop on any open space. The SA outcome for this option was unsurprisingly positive, as was allowing some limited development on open space. Loss of open space had a negative outcome in the SA.

5.16 Where there were areas of potentially low quality open space, the SHLAA at various stages looked at the potential for these areas to accommodate development. The Plan reflects this in its policies to protect this high quality open space but to allow some limited development in sustainable locations where the open space is not considered to be of high quality.

5.17 In February 2010 RBC produced a revised strategy for its Development Strategy Policy which was consulted upon [CDX 1.3]. It included options considered by the Council and the Council’s preferred approach. At this time one of the options was re-examined, which was to develop on all open space possibilities in Redditch Borough. The option to develop all of the open space within the Borough would reduce the need to travel as the land is within the urban area of Redditch ensuring that these locations are accessible and close to existing

facilities and services. However, this option would significantly reduce the amount of open space available within Redditch, which is one of its locally distinctive features. The open spaces make a significant contribution to the townscape and reflect the distinctive New Town master plan principles that give Redditch its character. This option also presents significant environmental concerns; in particular development would likely result in the loss of wildlife and habitats. In terms of recreation, development of the open spaces would result in a reduction in amenity space, which has a high recreational value. Locating new communities within the open spaces in the Borough would also increase densities in urban areas. Fundamentally, the basic choice was between open space and the Green Belt and the Green Belt was chosen to be more sustainable to accommodate growth.

#### Background Evidence Base:

- 5.18 'Public Open Space Standards in the Borough' was an evidence document produced in March 2009 [CDR 10.15]. This documents that many sites of archaeological interest are now largely contained within designated areas of Primarily Open Space. The Study concludes that this designation was undoubtedly partly fundamental in the justification for above average provision of open space in the Master Plan and 'on the ground' in the Borough.
- 5.19 The Joint Study into the future growth implications of Redditch Town to 2026 (WYG1) (2007) [CDX1.5] considered that any major expansion of the town should continue Redditch's established character when it comes to the levels of open space. It also recognised that the open space is not just protected through open space policy, and that a substantial amount of that open space land is also protected through important ecological designations.
- 5.20 The Study into the future growth implications of Redditch Second Stage Report (WYG2) (January 2009) [CDX1.4] although its key conclusions were largely rejected in the WMRSS Panel Report as previously described at para 2.19, as background evidence it does explain why some assumptions about the suitability of Redditch's open space have been made. WYG 2 states that Redditch is a planned New Town that incorporates good levels of open space including Arrow Valley Park which is regarded as a regional facility. It also recognised that there are large areas of landscaping to the principal roads leading to a perception of high levels of green space.
- 5.21 As part of WYG2 the consultants carried out a partial review of the RBC Open Space Needs Assessment (WYG2, Appendix 1) which has identified some potential surplus open space and these sites have been fed in to the SHLAA. This Appendix therefore provides further justification for the assumptions originally made in the HGDS process to accept the capacity of Redditch as it was, and to exclude Areas 3a and 7. This review only amounted to the inclusion of an additional six sites for consideration through the SHLAA process.

#### Site selection in the HGDS:

- 5.22 In the early stages of plan making when the Councils were information gathering prior to commencing formal work on the HGDS, a number of informal stages were carried out between Bromsgrove and Redditch. Initially the housing requirement for the purposes of undertaking the HGDS needed to be agreed, and at that time a total capacity of Redditch

was agreed as 4,500 dwellings. Prior to this agreement BDC had to ensure that this was the maximum capacity of Redditch given the planning opportunity cost of having to lose Green Belt.

- 5.23 Intensive joint examinations of both the open space documentation and the entire SHLAA exercise, including a joint site tour of the Redditch area was carried out on. The primary conclusion, which reinforces work done by RBC and White Young Green, was that there is not a hidden untapped potential in the Redditch urban area. A superficial view of Redditch might have suggested that there is but a focussed look at the evidence indicated that the high open space provision in Redditch is a result of the distinctive nature of the Town and additional urban capacity can only be found at the expense of some strategically important assets, such as Arrow Valley Park and Morton Stanley Park. Detailed and on-site scrutiny suggested that there may be scope for a relatively small number of additional small to medium sized sites to be developed but even at best this was still less than a 5% increase in residential capacity. This has to be counter balanced by the significant risks to the development of a number of identified residential sites, especially in the District Centres. It was therefore concluded that there was not scope for increasing the residential capacity above the 4,500 figure for the 2006-2026 period at that time.
- 5.24 In the HGDS itself, the methodology was consistent with the previous conclusion regarding open space, and the assessment rejected designated parks and open spaces from further investigation. Parks within Redditch were latterly considered in the HGDS Addendum but were not taken forward in the Focussed Area Appraisal for detailed assessment.

## 6. JOINT WORKING AND THE DUTY TO COOPERATE

- 6.1 The history of joint working between the two councils pre dates the legal requirement for the Duty to Co-operate as embodied in the Localism Act 2011 and the NPPF 2012. This is detailed in the Statement of Compliance with the Duty to Co-operate prepared by both Councils [CDB 1.4 and CDR 1.3]. A chronology detailing this joint working is contained at Appendix h of this document. The Duty requires local authorities to work with neighbouring authorities and other prescribed bodies to maximise the effectiveness of the preparation of their development plan documents and supporting activities so far as it relates to a strategic matter. Relevant planning policy issues to be considered under the Duty to Co-operate are also explained in National Planning Policy Framework (paragraphs 178 -181 and 156). Specifically it states “... *the Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities*” (paragraph 178). Cooperation should be a continuous process of engagement from initial thinking through to implementation and should consider cross boundary issues such as:
- homes and jobs needed in a geographical area;
  - infrastructure projects;
  - retail, leisure and other commercial developments;
  - social infrastructure;
  - climate change mitigation and adaptation (e.g. flood risk);
  - landscape and the natural and historic environment.
- 6.2 Predominantly, the issues facing the two Councils revolve around the limited capacity within Redditch Borough to sustainably accommodate growth needs and a previous assumption through the WMRSS process that unmet growth needs could best be partly accommodated in Bromsgrove District.
- 6.3 It was established early in the Phase 2 review of the WMRSS that there were limits to Redditch Borough’s capacity to accommodate the required levels of sustainable development. RBC explored its development capacity in detail but identified a shortfall of available and suitable land to meet its development needs.
- 6.4 After the removal of the regional planning tier the NPPF advocated setting locally derived requirements based on robust evidence, which met the full OAHN of the HMA. At that time it was accepted that Redditch and Bromsgrove fell in the Worcestershire HMA. A Worcestershire-wide Strategic Housing Market Assessment (SHMA) [CDB 7.2a and CDR 7.5a] was undertaken by the six Worcestershire Authorities which provided the opportunity to determine housing requirements across the County based on more up-to-date population projections than those used in the WMRSS evidence base (as described above in Chapter 4).
- 6.5 The first Redditch SHLAA was undertaken in 2008. At this point in time, due to the awareness of the probable shortfall in capacity within the Borough, RBC and BDC officers worked closely together to develop an aligned SHLAA methodology and site assessment appraisal process. There was an acknowledgement by both Local Authorities that, although there was no firm conclusion that BDC would meet Redditch’s housing capacity shortfall in

its District, joint SHLAA preparation offered an appropriate opportunity to develop an aligned methodology should a joint capacity evidence base be required in the future. Once the methodology and appraisal processes were agreed, both LAs proceeded to assess sites within their administrative boundaries separately.

- 6.6 Once the WMRSS Preferred Option was released it became clear that growth in Redditch would be a lot higher than previously anticipated and would require Green Belt and ADR land to be considered as available capacity (as discussed above paras 5.9-5.12). As also described above, WYG1 did not appear to imply that there would be any issues with including ADR or Green Belt in north Redditch for development.
- 6.7 Since the WMRSS Panel Report was released Bromsgrove and Redditch Councils undertook a joint consultation on Redditch growth options (Feb 2010) [CDX 1.3] (as explained in para 2.22 of this document). The consultation focussed on three broad locations for development options in an arc to the north/ north west of Redditch's urban area. The Councils' received mixed opinions about the public preference for preferred locations for growth. Since that time, the Government announced the revocation of the WMRSS which caused confusion and subsequently some delay in reaching a commitment from RBC to having a robust housing requirement and agreement from BDC to meet the growth requirements for Redditch. However, the six Worcestershire Districts did establish an up to date local evidence base through the Strategic Housing Market Assessment (SHMA) [CDB 7.2a and CDB 7.5c] The draft findings of the SHMA, which presented a range of development scenarios for all six LAs, were presented to all LA members. As the SHMA was being finalised (2012), the NPPF was published and a joint discussion with PINS was undertaken with Members from both LAs to consider an appropriate way forward for both LAs Plans. In May 2012, there was a change in political governance at RBC and an Annex to the SHMA for Redditch growth was undertaken to further analyse the SHMA scenarios and establish a housing requirement for Redditch [CDR 7.5b].
- 6.8 With the two authorities of Bromsgrove and Redditch understanding the housing growth implications and levels of growth necessary, collaboration recommenced to find the Authorities' preferred growth location and this itself involved the investigation of a number of options. The collaborative approach of officers was underpinned by the formal acknowledgement and acceptance of the Duty to Co-operate by the Leaders of both Councils.
- 6.9 The need to collaboratively plan across administrative boundaries culminated in the preparation of the Housing Growth Development Study in January 2013 [CDX 1.1], which involved Broad Area Appraisals of all 21 areas around Redditch's urban area identified in WYG1, followed by Focussed Area Appraisals in the Areas deemed to have the most growth potential.
- 6.10 Undertaking the Study included joint team meetings to set out a methodology and a joint survey team to undertake the on-site assessments. The site assessments and subsequent Sustainability Appraisal led to the development of scenarios for alternative growth locations

and a joint preferred option. The identification of a preferred option for development led to the development of a cross boundary housing growth policy, which was the subject of a joint consultation period in April and May 2013. The consultation period and subsequent response to representations work was undertaken jointly by both Councils. The outcome has resulted in both Councils submitting their Plans concurrently on the advice of PINS to ensure aligned Examination in Public hearings could take place. The Bromsgrove District Plan (BDP) includes Policy RCBD1 'Redditch Cross Boundary Development', which was jointly prepared and agreed by both Councils. This is referenced as an Appendix in BORLP4.

- 6.11 Cross boundary provision of land for employment use is an issue which has previously been addressed by BDC in relation to RBC shortfall. The Ravensbank Business Park to the north east of the Borough was allocated for up to 30 ha of development in the Bromsgrove District Local Plan (2004).
- 6.12 It has long been recognised that critical discussions on infrastructure capacity and planning may be more effectively and efficiently carried out over a larger area than a single local planning authority area. Paragraph 179 of NPPF states that LPA's should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.
- 6.13 Infrastructure needs are not necessarily constrained by Local Authority administrative boundaries and both Councils needed an understanding of the impact of development on their areas. It was acknowledged that the cross boundary sites in particular would impact on infrastructure in both Councils for example; schools, drainage and highways and a detailed understanding of these joint aspects was therefore essential. Both Councils also need to demonstrate that their Plans are deliverable which meant ensuring that the infrastructure needs of development are identified and viable.
- 6.14 Joint working on collecting up to date infrastructure information was carried out. The joint working also involved the sharing of contact databases; joint meetings where necessary with various infrastructure providers; agreeing a joint section on transport to be included in both IDPs and agreeing the next steps. Both Councils now have draft Infrastructure Delivery Plans (IDPs) which are fully informed by up to date information from infrastructure providers to support the delivery aspects of both Plans. It should be noted that due to the nature of the transport IDP work it proved impossible to separate this work out between the two Councils, so an agreed replica section is included in each document. These IDPs are 'live' documents and capable of being updated as new evidence emerges.

#### Plan-making evidence base

- 6.15 To underpin the premise of collaborative working by the two Councils, several studies have been undertaken or commissioned, which form a Joint Evidence Base, upon which both Plans rely:
- WYG1 (Dec 2007)[CDX1.5]
  - SHLAA – shared methodology (2008)

- Bromsgrove and Redditch Strategic Flood Risk Assessment Level 1 (2009) [CDB 10.13 and CDR 10.18]
- Bromsgrove and Redditch Scoping Water Cycle Study (Jan 2009) [CDR 10.16]
- Green Infrastructure Baseline Report (2013)[CDB10.26]
- Bromsgrove and Redditch Strategic Flood Risk Assessment Level 2 (2012) [CDB 10.12 and CDR 10.5]
- Worcestershire SHMA (Feb 2012)[CDB7.2a, CDB7.2b, CDR 7.5a and CDR 7.5b]
- Worcestershire SHMA - Redditch Updated Household Projections Annex (May 2012) [CDR 7.5c]
- Bromsgrove and Redditch Outline Water Cycle Study (May 2012) [CDB 10.11 and CDR 10.6]
- Housing Growth Development Study (Jan 2013) [CDX 1.1]and SA [CDB 3.1 and CDR 3.2]
- Bromsgrove and Redditch Cross boundary sites (transport modelling) (Jan 2013) [CDB 8.15 and CDR 11.2]
- Hewell Grange Estate – Setting of Heritage Assets Assessment (Jan 2013)[CDX1.38]
- Bromsgrove Infrastructure Delivery Plan (IDP) [CDB 1.13]
- Redditch Infrastructure Delivery Plan (IDP) [CDR 5.1]
- Worcestershire CIL Viability Study [CDB 6.4a and CDB 6.4b Executive Summary]
- SA/SEA Framework

6.16 It should be noted that the introduction of the RBC and BDC shared service management team in April 2010, has facilitated and ensured alignment of working wherever possible i.e. sharing evidence gathering and resources, regular meetings etc, although the two Councils still remain two independent Local Planning Authorities.

## 7. AREAS OF SEARCH AND INITIAL POTENTIAL GROWTH LOCATIONS

7.1 Whilst peripheral expansion of Redditch was not a feature of BORLP 3 (adopted in May 2007), it was clear from the Government's household projections in the mid 2000's that significantly more housing would be needed across Worcestershire, the West Midlands and England as a whole than had previously been the case for the last decade or more.

7.2 In the WMRSS adopted in 2004, there was a focus on the Main Urban Areas (MUAs). But even then Redditch was identified as a suitable location for some growth because of the emphasis placed on smaller scale local regeneration in certain locations outside the MUAs.

### **Joint Study into the Future Growth Implications for Redditch Town to 2026 (December 2007) (WYG1) [CDX 1.5]**

**Please note: This summary does not seek to replicate all of the analysis and conclusions that is contained in the full document which can be found in the link below.**

<http://www.redditchbc.gov.uk/media/995443/CDX15-Joint-Study-into-the-future-growth-implications-of-Redditch-town-to-2026.pdf>

**Please also note that WYG1 refers to 'Sites' rather than 'Areas' as later used in the HGDS but these denote the same locations.**

7.3 The need to accommodate significantly more housing development at Redditch was recognised jointly by Worcestershire County Council, Redditch Borough Council and the District Councils of Bromsgrove and Stratford. The WYG Report (WYG1) published in December 2007 was the culmination of that work.

### 7.4 WYG1 Summary

White Young Green Consulting (WYG) was commissioned in May 2007 by Worcestershire County Council, in conjunction with Redditch Borough Council, Bromsgrove District Council and Stratford-on-Avon District Council to carry out a strategic assessment of the implications for potential future growth within and adjoining Redditch Borough over the period to 2026. The purpose of the Study was to give clear guidance on the implications of accommodating those growth levels in the various locations around Redditch Borough. At the time of writing, the Study was originally intended to detail the level of additional peripheral growth required to meet the housing and employment requirements set out in the WMRSS Spatial Options Consultation and therefore inform the Preferred Option of Phase 2 of the Partial Revision of the Regional Spatial Strategy for the West Midlands Region to 2026.

7.5 The Study tested three development scenarios for the period 2001 – 2026, these were 4,300 dwellings (Option 1), 8,200 dwellings (Option 2) and 13,200 dwellings (Option 3). Since the original report was drafted The Regional Planning Partnership concluded that the Preferred Option for growth between 2006 and 2026 at Redditch should be 6,600 dwellings. 3,300 to be found within Redditch Borough and a further 3,300 in the neighbouring administrative areas of Bromsgrove and/or Stratford-on-Avon Districts (CDX 1.5, para 10.01). In order to compare this preferred option with the three original options it was necessary to adjust the

initial targets, on this basis Option 1 would have required 2,184 dwellings, Option 2 6,714 dwellings and Option 3 11,714 dwellings. Therefore the Preferred Option at 6,600 dwellings is more than Option 1 but less than either Option 2 or Option 3 (paragraph 10.02). It is important to note the housing requirement being put forward through the emerging Redditch Local Plan (currently subject to Examination) is 6,400; this is in-between Option 1 and 2 but aligns more closely with Option 2.

Methodology:

- 7.6 The first stage of the WYG Study assessed the extent to which Redditch Borough could accommodate the growth associated with the three scenarios within its current built up area. The second stage of the methodology analysed the constraints to development. The purpose of this was to identify the variety and extent of a wide range of development constraints affecting the periphery of Redditch's built up area and therefore the implications associated with major peripheral growth at Redditch. As part of this stage the identification of potential development options were examined using a Strengths, Weaknesses, Opportunities and Threats (SWOT) analysis technique. The SWOT analysis also considered each of the identified potential development sites against a range of sustainability criteria such as accessibility to existing employment areas, retail provision, public utilities and access ability by a range of modes of transport. The final stage of the Study was to assess the implications of directions of peripheral growth. Implications were assessed not just in terms of the effects on Redditch, but also in regard to general consequences for other settlements in the vicinity of Redditch.
- 7.7 As stated above a sequential approach was adopted in WYG 1 to meeting development needs. First preference was previously developed land within the existing urban area, followed by the ADRs and any other non-Green Belt land (i.e. open space) and finally land within the Green Belt (see 'Findings' below). Further information is provided below regarding the use of ADR land and open space land.
- 7.8 The Study identified 21 separate areas on the edge of Redditch encompassing all of the land on the urban periphery. The purpose of identifying a range of sites that collectively encompass all of the land on the urban periphery within the Bromsgrove, Redditch and Stratford's administrative boundaries was to ensure that all reasonable opportunities to achieve balanced growth within Redditch were explored.

Consideration of the existing urban area:

- 7.9 Chapter 4 of the Study demonstrates how the urban area of Redditch has been fully considered to ensure the maximum capacity was achieved. Completions and commitments post 2001 were deducted from the total required. Available sites were originally considered through the 2004 Urban Capacity Study, this has since been updated by the Strategic Housing Land Availability Assessment (SHLAA), which is updated on an annual basis. This chapter concludes with the net required allocations following this assessment for housing, which includes total land needed to ensure any housing development is supported by other appropriate uses, for example education and open space.

#### Consideration of ADRs in Redditch:

- 7.10 The Borough of Redditch Local Plan No.2 established three ADRs - Webheath, Brockhill and along the route of the planned but now abandoned improvements to the A435 to the east of the Town. These designations were continued in Local Plan No.3 which was adopted in May 2006. These sites were identified as having long-term potential to meet the needs of the town and are excluded from the Green Belt. There is also an ADR at Ravensbank Drive within Bromsgrove District that is intended to assist in meeting Redditch's possible long term employment land needs. Winyates Green Triangle is white land that is located within the administrative boundary of Stratford-on-Avon bounded by the A435 and the A4023. This site was removed from the Green Belt in a previous Local Plan and allocated for housing to assist in meeting the needs of Redditch at the time. When the Stratford-on-Avon Local Plan was reviewed the area was de-allocated because there was no overriding housing requirement to be met at the time. However the Local Plan Inspector rejected the case by the Council to re-instate the site as Green Belt and therefore it remains white land (CDX 1.5, para 6.03). In order to ensure protection of Green Belts, safeguarded land between the urban area and the Green Belt can be used to meet longer-term development needs (CDX 1.5, para 2.06). The Study concluded that the ADRs would be sequentially preferable to other areas of open countryside that have either been considered for development and ruled out, or have never been considered at all (CDX 1.5, para 9.03).
- 7.11 WGY1 stated that ADR land has the same status as white land and should be regarded as being sequentially preferable to areas within the Green Belt (paragraph 10.05). The Practice Guidance for SHLAAs (July 2007) (now superseded by NPPG – Housing and economic land availability assessment (ID:3) says that suitable greenfield sites as well as broad locations which would normally have been identified by the WMRSS should be included within the assessment of long term capacity (beyond 10 years). WYG1 explain that in conformity with the guidance it is necessary to consider what capacity could be provided by these sites before assessing the amount of new allocations that would be required to meet each of the growth options. Redditch Borough Council assessed the combined capacity of Webheath and Brockhill to be 1,050 dwellings. The Study estimated that the designated A435 ADR, the adjoining land to the west of the A435 and the Winyates Triangle site could potentially accommodate some 898 dwellings.
- 7.12 All three ADRs and Winyates Green Triangle combined have a capacity of 1,948 dwellings. However, they are insufficient in themselves to accommodate the scale of growth put forward in the WMRSS Revision Options 2 and 3. Therefore in order to accommodate the levels of growth suggested by Options 2 or 3, land which is currently Green Belt is required. This task was to identify sufficient land to accommodate around 2,000 dwellings for Option 2 and around 7,000 dwellings for Option 3.

#### Consideration of Open Space in Redditch:

- 7.13 As stated above a sequential approach was adopted in WYG1 to meeting development needs, with 'other non-Green Belt land' within the administrative area being considered before the Green Belt.

7.14 Redditch has an extensive provision of Open Space which is generally protected by Policy R.1 of adopted Local Plan No.3 and other important ecological designations, such as Sites of Special Scientific Interest (SSSIs), Special Wildlife Sites (SWSs) or Local Nature Reserves (LNRs). The extent of potential development land examined within the built up area of Redditch was restricted by the Council's strong desire to retain the green infrastructure available within the built up area on the basis that it is an integral part of the planned new town and is a vital component of the Town's distinguishing character (CDX 1.5, para 5.06). The WMRSS Phase Two Revision supported this stance, paragraph 2.14 of WYG1 states, *"The Phase Two Revision also recognises that 'it is important that the right types of houses are built in the right places, where people need them, whilst respecting the character of the community and the environment where they are built'. In order to maintain Redditch's unique structure (resulting from its planned development as a New Town) which incorporates a high proportion of greenspace, the gross land take of any peripheral development is likely to be significantly higher than would be the case in other towns in the region."* Therefore this approach was accepted by the WMRSS.

Green Belt:

7.15 In line with national planning policy (at the point of the WYG 1 study being written this was PPG 2 Green Belts, more recently superseded by the NPPF) the essential characteristic of Green Belts is their permanence and that their protection must be maintained as far as can be seen ahead and boundaries should be altered only in exceptional circumstances. The Green Belt affects the extent to which Redditch can expand at the periphery of the Town, as it wraps around the boundary of the built up area of Redditch.

7.16 In identifying options that would involve incursions into the Green Belt, WYG1 has had regard to the purposes of Green Belts as set out in paragraph 2.04 of the Study to ensure that any necessary breaches of the Green Belt boundaries are carried out sensitively so as to minimise the harm arising. The Study sought to identify directions for growth which would cause the least harm to the purposes of the Green Belt, whilst producing sustainable forms of development which may outweigh this harm. In terms of assessment, the Study flagged up the fact that each site was in the Green Belt as a weakness in the SWOT analysis. In identifying the land parcels for further consideration within the SWOT analysis, it was not assumed that all of the land within any given numbered land parcel was able to accommodate, or was appropriate for development. The purpose of the initial assessment was to identify whether there was, in general terms, sufficient quantity of land on the urban periphery to potentially absorb the development requirements arising from the three growth options. It was also required to provide more detailed consideration of the nature and severity of the constraints within the land parcels, to gain an understanding of the realistic and appropriate potential for accommodating development (CDX 1.5, para 6.08).

Findings:

7.17 WYG assessed each site area and concluded in area 'Quadrants' (as shown in Appendix f of this document), the Quadrants are as follows:

- North West Quadrant – Sites 5, 6 and 11

- North East Quadrant – Sites 7, 8, 9, 10 and 20
- South East Quadrant – Sites 12 to 19
- South West Quadrant – Sites 1 to 4

#### 7.18 North West Quadrant

Development in this area has the potential to link to the A448 and A441, there is the potential to extend the ADR in Site 6 beyond its boundaries, the southern part of Site 11 and eastern part of Area 5 are well located relative to the Town Centre and employment area. However, development in this area would have infrastructure implications in terms of highways and foul drainage. It was also considered that development in this area would affect the character of Bordesley. This study did not consider the implications of the development of Area 5 on the Hewell Grange Registered Park and Garden. A historic impact assessment has been carried out since (December 2015) and has determined that no development could occur in Site 5 due to the implications on this heritage asset [CDX 1.38] Hewell Grange Estate Setting of Heritage Assets Assessments.

#### 7.19 North East Quadrant

Site 8 is considered to be well related to the Town Centre and employment and infrastructure improvements could be simpler and cheaper than other sites. However it is acknowledged that Site 9 would be relatively unsustainable to develop in isolation, if it were developed with Site 8 this likely to have expensive infrastructure implications. Development of Site 8 would bring the built up area of Redditch close to Rowney Green, affecting its character. Development in Sites 9, 10 and 20 are likely to affect the character of the surrounding areas.

#### 7.20 South East Quadrant

Sites 14, 15, 17, 18 and 19 are reasonably well located to employment areas. Development in this area could have infrastructure advantages - highway and foul drainage. Development in Site 18 appears to be feasible and sustainable. However, development in this area is relatively remote from the Town Centre, it would be difficult to create a long term defensible boundary to the east of the A435, development within Sites 12 to 15 would have the effect of merging other settlements with Redditch affecting their character and Site 16 would be unsustainable and result in a new settlement within the Green Belt.

#### 7.21 South West Quadrant

It was considered that a substantial proportion of the land within Sites 1 to 4 (with the exception of Site 3A) do not exhibit significant or environmental policy constraints and there is the potential for the Webheath ADR to be developed independently from the remainder of Site 3. However there are disadvantages to accommodating development in this area – Sites 1 to 3 are poorly connected to the main road network, Sites 1 to 3 are relatively remote from the Town Centre and employment areas and Sites 1 to 3 are more attractive in landscape terms than other areas designated as having landscape value. The disadvantages detailed are in relation to Sites 1 to 3 and are not highlighted in relation to Site 4. The Study also highlights in this area that provision of foul drainage would be relatively problematical

and costly and it may be difficult to identify a long term defensible Green Belt boundary and development of Site 1 would create coalescence affecting the character of the area.

Conclusions:

- 7.22 The Study concluded that adverse strategic planning implications associated with accommodating growth adjacent to the Town would be minimised to the north west/ north east with development concentrated around the A441 (north) link (paragraph 8.33 and 8.34). Constraints imposed by highway and drainage infrastructure are generally less to the north than to the south and west. Also expansion northwards in the north west quadrant including the development of the Brockhill ADR would be relatively close to the Town Centre and would result in significant savings on vehicle mileage in comparison with the more peripheral locations, these would be further minimised if improved public transportation links are incorporated into any masterplan for the area.
- 7.23 The conclusions drawn on the South East Quadrant demonstrate that developing in this area would be unsustainable; following these Conclusions the decision was taken for Redditch to work with Bromsgrove to consider the suitable areas to accommodate future housing growth.
- 7.24 The conclusions drawn on the South West Quadrant highlights a number of disadvantages in relation to Sites 1 to 3. These disadvantages are not highlighted in relation to Site 4.

## **8. COLLECTION AND CONSOLIDATION OF THE EVIDENCE**

- 8.1 The Housing Growth Development Study [CDX 1.1] is the Councils' key piece of evidence to inform the site selection process. However the HGDS itself relied upon numerous pieces of primary and secondary evidence in order to aid decision making.
- 8.2 Consideration of the Green Belt and the potential for each of the Areas to harm the Green Belt was a very important factor that influenced decision making in the HGDS. All evidence collected to inform this decision making was primary evidence collected by the two Councils. It consisted of evidence on the five purposes of Green Belts and was considered in the following way:
1. Checking unrestricted sprawl of large built up areas – site visits were undertaken to confirm if each Area or parts of an Area are remote from the urban area, whether there are current strong boundaries to contain the Area, recording the topography and screening within and around the Area to minimise the impact of sprawl.
  2. Preventing neighbouring towns merging into one another – Desk based evidence and follow up site visits were undertaken to confirm the extent of concern for coalescence with defined settlements.
  3. Safeguarding countryside from encroachment – Some Areas were divided into segments to enable a more detailed review of potential for encroachment. Site visits established the key features in the Areas or segments in terms of ridge lines and topography, tree lines and wooded. Consensus was then made on the degree of containment and potential visual impacts.
  4. Preserving setting and special character of historic towns – Whilst no consistent content was displayed for all Areas, wherever issues around about preserving character and history arose the HGDS described the nature of the issue.
  5. Urban regeneration by encouraging the recycling of derelict or other urban land – Any urban or derelict land within each Area were described as well as any potential smaller scale regeneration opportunities.

Other aspects of the Green Belt which the Councils considered to be important in determining which sites to allocate were assessed in the HGDS and were considered in the following way:

- Green Belt gap/ Strategic Green Belt gap – Whilst no consistent content was displayed for all Areas, wherever issues arose about the potential reduction of the Green Belt Gap based upon the distance between settlements, the HGDS described the nature of the issue and which settlements are potentially compromised.
- Potential Green Belt boundary – Field boundaries were numbered for ease of reference and description in the HGDS. Site visits enabled detailed descriptions to be made of all of the boundaries within and around each Area. It was possible at these site visits to confirm which are stronger and which were weaker boundaries, with the aid of a pre-set

definition of strong or weak boundaries that is set out in paragraphs 3.38 and 3.39 of the HGDS.

- Other evidence to support HGDS – Photographs were taken during site visits and records of the position and viewpoints of the photographs were recorded.

- 8.3 Heritage issues were investigated and reported in the HGDS sections under ‘Built Environment’. For the Focussed Appraisal Areas, site visits and desktop searches allowed for urban and rural landscapes to be examined. This considered how development could integrate into these landscapes whilst enhancing the built environment and protecting historic assets. This part of the survey was conducted using maps, detailing where historic assets such as Listed Buildings and Conservation Areas were located (using information at <https://historicengland.org.uk/listing/the-list/>) and their relationship to the potential development sites, with particular reference to English Heritage’s guidance on the setting of historic assets. The site visit work was a crucial element to assess this specific principle as well as full utilisation of the Worcestershire County Council Landscape Character Assessment (using information at <http://gis.worcestershire.gov.uk/website/LandscapeCharacter/>) and the Historic Environment Assessments for Bromsgrove District [CDB 9.22] and Redditch Borough [CDR 14.1].
- 8.4 Landscape sensitivity evidence which is available from [http://www.worcestershire.gov.uk/downloads/file/4789/landscape\\_character\\_assessment\\_technical\\_handbook](http://www.worcestershire.gov.uk/downloads/file/4789/landscape_character_assessment_technical_handbook) was used during the production of the HGDS to add to the information available on Green Infrastructure so that the information on key environmental schemes and designations were available in one place. This allowed comparisons to be made for all Areas. Other Green Infrastructure information was added to build layers of evidence which is available at [http://www.worcestershire.gov.uk/downloads/download/707/worcestershire\\_green\\_infrastructure\\_framework\\_documents](http://www.worcestershire.gov.uk/downloads/download/707/worcestershire_green_infrastructure_framework_documents). The Addendum to the HGDS [CDX 1.47] included additional evidence in the form of the report by White Consultants on behalf of Stratford on Avon District Council for the landscape character of one of the newly assessed areas.
- 8.5 Biodiversity also came under the consideration of the Green Infrastructure section in the HGDS. The number of, and the location of SSSIs contained within each Area were described and mapped along with any Special Wildlife Sites and a description of their importance and any necessary mitigation should development occur. This information was sourced from [http://www.worcestershire.gov.uk/downloads/download/707/worcestershire\\_green\\_infrastructure\\_framework\\_documents](http://www.worcestershire.gov.uk/downloads/download/707/worcestershire_green_infrastructure_framework_documents) and <http://www.magic.gov.uk/>. Similarly any habitats listed in the Worcestershire Habitat Inventory held by Worcestershire County Council were described and the protected species recorded within each Area were listed. The Addendum to the HGDS [CDX 1.47] used information from the Review of the A435 and Adjoining Land [CDR 5.5] to inform the HGDS Addendum, because this gathered information on habitats and protected species at one of the newly assessed Areas (Area 18).
- 8.6 Information was collected to inform the Councils of any constraints arising from trees and woodlands within each Area. Using information available from Local Authority records and Tree Preservation Order records it was possible to determine the extent of the Areas tree

coverage, and to describe the wooded areas in existence. This included a description of where any areas of ancient woodland exist. In all cases these areas would be able to form part of the Green Infrastructure network within developments.

- 8.7 The HGDS included evidence on the best and most versatile land and agricultural land quality. This information came from <http://publications.naturalengland.org.uk/publication/130044?category=5954148537204736> which was reliable because it contains consistent evidence that is available across all Areas. It was possible to determine what likelihood each Area has for containing the best and most versatile agricultural land.
- 8.8 Owing to a restructure of the NHS and other uncertainties it was not possible to gather reliable evidence to inform the health services, GP surgeries, hospitals and dentist aspects of the original HGDS. The Addendum to the HGDS [CDX 1.47] was completed after the original, when more information was available. The Addendum therefore collected information from the Clinical Commissioning Group for Bromsgrove and Redditch who suggest that they do not anticipate that the level of growth proposed would result in any proportionate increase in hospital estate. There is, however, likely to be an impact on the need for GPs and the number of GP surgeries. The Areas assessed in the HGDS Addendum gave information on the likely additional patient numbers and which GP surgeries would be likely to need to accommodate these patients. Limited information on the location of services was sourced from <http://www.nhs.uk/service-search/GP/Redditch/results/4/-1.941/52.309/4/17631?distance=25> and <http://www.nhs.uk/Service-Search/Dentists/Redditch/Results/12/-1.941/52.309/3/17631?distance=25> and <http://www.nhs.uk/Service-Search/Hospital/Redditch/Results/3/-1.941/52.309/7/17631?distance=25>
- 8.9 Education information was collated to determine the possible capacity of the first, middle and high schools around Redditch and what impact development within each Area might have on that capacity. It was possible to determine that there were capacity issues which meant that any Area providing for growth would require direct provision of First school infrastructure. This was determined by Worcestershire County Council Children's Services using a formula to determine the number of additional pupils per year group. Limited information on the location of schools was sourced from <http://e-services.worcestershire.gov.uk/SchoolSearch/SearchSchools.aspx?Search=Area&DisplayResults=True&Location=Redditch>
- 8.10 The distance to and frequency of public transport was considered in the HGDS. Primary data was collected to inform this aspect of the study. A distance to Redditch train station was recorded as well as the total number of bus services running within 1km of each Area was recorded. Details about each of the services were provided to give an indication of the destinations and frequency of the services. Information on the route times and numbers was sourced from <http://www.worcestershirebus.info/category/3-redditch-district/> and <http://myweb.tiscali.co.uk/worcesterfolk/TTRE.pdf>. A route map was sourced from [http://www.worcestershire.gov.uk/downloads/file/4240/redditch\\_bus\\_route\\_map](http://www.worcestershire.gov.uk/downloads/file/4240/redditch_bus_route_map). It

was possible for the Councils to understand what mitigations or improvements would be necessary depending upon the areas selected for development. Cycle provision was evidenced by recording the location of cycle routes and the details of these routes in terms of where they connect to.

- 8.11 Information on transport was evidence from secondary data collected by Worcestershire County Council Highway Department, particularly from the Transport network and mitigation Report [CDB 8.14 and CDR11.1]. Transport modelling work on various scenarios was able to determine where any likely highway pressures were going to be felt as well as its necessary mitigation. The work completed by WCC was also able to provide the Councils with some evidence on the likelihood of being able to extend existing public transport services into each Area or whether an entirely new bespoke service would be required.
- 8.12 Flood Risk evidence was available from the Councils Strategic Flood Risk Assessments levels 1 and 2 [CDB 10.12, CDB 10.13, CDR 10.5 and CDR 10.18]. For the purposes of the HGDS, watercourses that are relevant to each of the Areas were described. Where the Flood Zone definition was available for each watercourse it was described as well as where the relevant flood zones exist.
- 8.13 Evidence from the Councils Water Cycle Strategy [CDB 10.11 and CDR 10.6] helped to inform the HGDS on water related issues. The Study presented which Sewerage Treatment Works was likely to receive the waste water and what resulting issues might arise. Assistance was sought from Severn Trent Water as to the water supply matters and the water supply issues are consistent for all of the Areas.
- 8.14 The Hewell Grange Estate - Setting of Heritage Assets Assessment 2013 [CDX 1.38] is a Council produced evidence base document which informed the HGDS. There are some important conclusions made regarding Area 5 in the HGDS (paragraphs 6.2.93 – 6.2.97) which are directly informed by the evidence in the setting assessment. Since this document was produced further work on heritage has been produced Hewell Grange Estate Setting of Heritage Assets Assessment Update (December 2015).
- 8.15 The HGDS SA [CDB 3.1 and CDR 3.2] was relied upon within the HGDS to help inform the Study. Section 7 of the HGDS summarises the assessment made of the sustainability impacts of all the realistic growth options around Redditch. This should be read alongside the HGDS Addendum [CDR 1.47] which assessed additional Areas that were not assessed in the original HGDS. The outcomes of assessing each Area were compared to identify which were performing the best. It was later determined through the examination process that the Redditch SA should be recast to include the assessment of the Areas for cross boundary growth rather than reliance on the HGDS SA.

## **9. AREA SELECTION PROCESS**

9.1 There are a number of documents which taken together provide the evidence base and rationale for the site selection process. The evidence is consolidated in the Housing Growth Development Study (January 2013) [CDX1.1], and its later Addendum (November 2014) [CDX 1.47].

9.2 A separate Sustainability Appraisal was produced alongside the HGDS in January 2013 [CDB 3.1] together with an Addendum (November 2014) which although a material component of the evidence base, it is the Redditch SA (May 2015) [OED33c] which is the most recent SA.

### **Housing Growth Development Study and Associated Documents**

#### ***Housing Growth Development Study (HGDS) [CDX 1.1]***

9.3 Section 2 explains in detail what the purpose is of the Housing Growth Development Study. In terms of site selection, the HGDS is the principal evidence base for examining the suitable locations to accommodate Redditch's additional growth. These are the key documents for explaining the Councils detailed approach taken to determining which of the sites are more appropriate than others.

9.4 The site selection methodology is set out in the HGDS which is structured to reflect the process undertaken by the Councils:

- Strategic Objectives - To identify the Strategic Objectives which development in Area(s) would need to contribute to.
- Methodology - To explain how the Area selection process was carried out and the sources of information.
- Area Assessment Principles - To identify the principles that are used in the Area Assessment process.
- Broad Area Appraisal - To identify broad Area(s) that are more appropriate for accommodating the development in accordance with relevant criteria.
- Focussed Area Appraisal - To examine in further detail the Focussed Areas identified at the Broad Area Appraisal stage and identify the most suitable Area for accommodating the outstanding growth needs in Redditch by using the Area Assessment Principles.
- Sustainability Appraisal (SA) Summary - A summary of the main conclusions of the SA and how these findings impacted on the HGDS.
- Scenarios for alternative growth locations - An explanation of how the various options for alternative growth locations have been selected and tested.
- Delivery and Phasing Information on the anticipated phasing and delivery issues relating to each Area.
- Conclusions- Summary comparison of the suitability of Areas and identifying which Areas comprise the preferred option for the purposes of consultation. Identification of chosen locations i.e. Area 4 (Site 1) and Area 6 (Site 2)

9.5 The Broad Area Appraisal stage is the process by which all the potential locations for growth were assessed. The Area Assessment Principles were divided into headings (known as sustainability considerations) within the HGDS, and each Area was assessed against these principles. It was established in the methodology (Chapter 3) of the HGDS how these sustainability considerations were being assessed. This process allowed the Councils to make

clear recommendations on the Areas which should not be carried forward to the Focussed Area Appraisal.

- 9.6 The Focussed Area Appraisal examined those sites which were not discounted at Broad Area Appraisal stage. There were five Areas assessed in the original HGDS and a further two Areas in the later Addendum to the HGDS. After undertaking this more detailed appraisal it was possible to make conclusions on the main strengths and weaknesses for each of the Areas. It was then possible to say whether each Area had potential as a growth area.
- 9.7 These key factors that influenced the Area selection process of the preferred sites are set out in the remainder of Section 9. A key part of the process recognised that some factors were more important and more significant as differentiators of Area selection than others (i.e. accessibility to the Town Centre). These were planning judgments made by the two Councils.

***Housing Growth Development Study Sustainability Appraisal (HGDS SA) [CDR 3.2/CDB 3.1]***

- 9.8 As explained in detail in Chapter 2, the HGDS was accompanied by a Sustainability Appraisal. The document is set out in four key stages:
- 1) Comparison of Strategic Objectives against SA objectives
  - 2) Comparison of Area Assessment Principles against SA objectives
  - 3) Sustainability Appraisal of Redditch Growth Broad Area Options
  - 4) Sustainability Appraisal of Scenarios for Alternative Growth Locations
- 9.9 Area selection is especially informed through stage 3 of the HGDS SA. Each of the Areas being assessed in the HGDS was subjected to SA (except Areas 3a, 7 and 18 at the original stage, Area 18 being subjected to SA at the Addendum stage). This SA benefitted from being independent of the two Councils own SAs related to the Plans, and the Councils had developed a common set of SA Objectives and decision making criteria to carry out this process.
- 9.10 When undertaking the SA, the outcome for each Area was analysed and it was clear that some Areas performed better than others. The outcome of this work helped frame the decision making undertaken in the HGDS by determining which of the identified Areas around Redditch would deliver the most sustainable form of development for future growth.

***Addendum to the HGDS and HGDS SA [CDX 1.47]***

- 9.11 The Addendum was produced following the first hearing sessions into the cross boundary development matter in November 2014. This document followed the same methodology as the original HGDS and its SA to produce additional analysis for the Areas originally excluded from the SA and from the Broad Area Appraisal contained within the HGDS (Areas 3, 3A, 7 and 18). As explained in the SA, Areas 3A and 7 were excluded at the Broad Area Appraisal stage because they are private open space. Area 7 (Abbey Park) was excluded on the basis of its scoring against the SA objectives. This is similar to other Areas which had previously been examined such as Areas 1,2, 9 and 10 (HGDS SA Addendum, para A4.84). Area 3A (Morton Stanley Park) was excluded at the Broad Area Appraisal Stage despite a positive scoring against the SA objectives because of the fundamental objection to the use of this important

public open space for housing. (HGDS SA Addendum, para A4.85). This confirms the earlier conclusions in the original HGDS about the fundamental objection to the development of such Areas. But this had not been the subject of assessment in the Broad Area Appraisal or the accompanying SA, and this needed to be explained.

- 9.12 The key factors that influenced the Area selection process of the preferred Areas which were subject to analysis in the Addendum are set out in Chapter 9.
- 9.13 The HGDS Addendum and the SA demonstrates that all Areas reasonable alternatives, including ADR land (Areas 18 and part of 3) and the large peripheral parks (Areas 3A and 7) have been examined as part of the SA process. This is summarised in the final version of the SA at paragraph 24.

#### ***Borough of Redditch Local Plan No.4 Sustainability Appraisal [OED33c]***

- 9.14 Further SA work informing site selection is contained within the Borough of Redditch Local Plan No.4 Sustainability Appraisal (May 2015). This version of the SA addressed issues identified with the SA Refresh of November 2014 and sought to bring together into a single document, material spread across several documents. This SA records the Plans progression to Submission and the SA analysis regarding site selection.
- 9.15 The SA process is of necessity based on a simple and rudimentary scoring system. This does make it difficult to properly address key considerations such as Green Belt and especially the clear need to use land not in the Green Belt which is suitable for development (such as Areas of Development Restraint) before considering how much Green Belt land is needed.

#### **Green Belt: Use of ADR land**

- 9.16 The Area selection process has involved consideration of the use of ADR land. ADR land is land which was removed from the Green Belt for the express purpose of being utilised to meet the future development needs of the Town. It has therefore long been recognised as land suitable for development and has the very considerable advantage of being land located outside of the Green Belt, whereas all other land around Redditch is contained in the Green Belt.
- 9.17 The original HGDS recognised this and the land was identified for development. It was not the subject of the SA. This was a point of concern for the Local Plan Inspector who advised that these Areas should be assessed. This was done in the Addendum to the HGDS and the accompanying SA.
- 9.18 As one might imagine the status of ADR land, removed as it has been from the Green Belt to meet future development need, has been a key determining factor in the selection of Areas suitable for allocation. Both sites 3R (Webheath) and 18 (A435) have been selected as Areas to meet future housing development needs.

#### **Green Belt: Purposes of Including Land in the Green Belt**

- 9.19 The HGDS [CDX 1.1] provides both primary evidence on the review of the Green Belt around the Redditch urban area and also draws on other evidence, including technical evidence. The Green Belt Review work involved examining Green Belt land within Bromsgrove District, Stratford-on-Avon District and Redditch Borough itself.

- 9.20 The original HGDS explains the methodology for the Green Belt Review work and states broadly that land was assessed against the 5 purposes of the Green Belt and, drawing on best practice, defensible Green Belt boundaries were then identified. Further details on the methodology employed is provided on pages 11, 12 and 13 of the HGDS.
- 9.21 The 5 Purposes of the Green Belt are defined by the NPPF:
- 1) To check unrestricted sprawl of large built up areas
  - 2) To prevent neighbouring towns from merging into one another
  - 3) To assist in safeguarding the countryside from encroachment
  - 4) To preserve the setting of historic towns
  - 5) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land
- 9.22 The HGDS and Addendum discuss all of the first three purposes of the Green Belt in a certain amount of detail. The fourth purpose, to preserve the setting and special character of towns does not explicitly refer to issues such as the setting of historic assets, so this issue is not addressed in the Green Belt section in all Areas. The exception to this is Area 5 due to the significance of this Grade II\* Registered Park and Garden and Conservation Area being located in close proximity to a potential development area. Other Listed buildings and heritage assets are however discussed in all sections under 'Built Environment' in the HGDS and in this narrative below under 'heritage impact'.
- 9.23 The fifth purpose applies to all Areas within the Green Belt. By their nature and designation they should contribute to the recycling of derelict and urban land as Green Belt is generally a prohibitive designation where development is rarely acceptable, thus urban development becomes the focus for development. The HGDS does however provide some micro level information on brownfield land and opportunities for redevelopment within specific Areas.
- 9.24 Therefore the key determining factors for the site selection process in the HGDS in relation to the Green Belt relate predominantly to the first three purposes namely:
- 1) To check unrestricted sprawl of large built up areas,
  - 2) To prevent neighbouring towns from merging into one another and
  - 3) To assist in safeguarding the countryside from encroachment coalescence.

The ability to identify a defensible Green Belt boundary is key in this process of analysis particularly in relation to the first purpose of checking unrestricted sprawl. Strong and weak Green Belt boundaries were identified as part of the primary analysis carried out in the HGDS and the ability to identify strong defensible Green Belt boundaries was considered of major importance in the site selection process.

- 9.25 The ability of Areas to check unrestricted sprawl has been examined in some detail in the context of the ability of Areas to absorb development without resulting in sprawl via the identification of strong Green Belt boundaries.

Table 1: Boundary descriptions

Strong	Weak
Motorway	Disused railway lines
Formal road network	Private/ unmade roads
Railway line (in use)	Field boundaries
Rivers, streams, canal, other watercourse	Park boundaries
Prominent physical boundaries	Power lines
Protected woodland/ hedges	Non protected woodland/ trees/ hedges
Residential or other development with strong established boundaries	Residential or other development with weak or intermediate boundaries

9.26 The analysis shows that Area 3 (ADR) Area 4, Area 6 and Area 18 comprise Areas where a meaningful level of development may be contained within the landscape by, for example, a combination of topography and features which provide strong defensible Green Belt boundaries, without incurring adverse effects of one of the five purposes of the Green Belt ‘to check unrestricted sprawl of large built up areas’. In Area 8 the landscape is generally characterised by a gently undulating and rising slope up towards Storage Lane providing largely uninterrupted views over a wide expanse of the landscape of Area 8. Therefore even though the landscape here is predominantly of medium sensitivity, potential development of the magnitude required is capable of being extremely prominent and intrusive and would comprise sprawl, this is exacerbated by the difficulty of identifying any potential for a strong defensible boundary short of Storage Lane. In relation to Area 11, only a small area of land can be identified which is capable of being contained.

The ability to define strong defensible boundaries and contain sprawl has therefore been an important determining factor in the site selection process.

9.27 In relation to preventing neighbouring towns from merging into one another this was examined in the context of the potential for coalescence between towns i.e. Bromsgrove Town and Redditch Town and at a higher level with Birmingham City. The definition of settlement has however been discussed more widely in the HGDS with some discussion of potential for coalescence with hamlets and ribbon development. However such entities are not typically defined in the Planning profession as settlements, for example, for the purposes of settlement hierarchy analysis, are in effect outside the scope of this purpose. However, for completeness, where potential coalescence has been identified with hamlets or ribbon development this has been mitigated when developable area boundaries have been defined.

- 9.28 In relation to the third purpose of assisting in safeguarding the countryside from encroachment, the HGDS recognises that this is closely related to the first purpose of checking unrestricted sprawl. The analysis generally discusses this purpose in the context of visual containment of proposed development. It could however equally be interpreted that encroachment could relate to the presence of urbanising influences, such as equestrian uses, sports pavilions, courts, sports pitches, SuDS attenuation ponds, caravan storage, floodlighting or encroachment by large concentrations of built development. However these urbanising influences are only likely to be of significance if they have an impact on openness. For example, in Area 3 urban development is already prominent on the Crumpfields Lane ridge, together with equestrian use of the ADR, although only for the grazing of horses rather than built form, with development also present on a further two boundaries. In relation to Area 4 the edge of the urban development of Redditch is already visible on high ground at Webheath (development off Great Hockings Lane) together with some urbanising influences such as a riding school and stables. In Areas 5 and 6 the urbanising influences appear to be more limited. In Area 11 urbanising influences are present in the form of employment uses at Weights Lane. In Area 8 ribbon development at Bordesley is visible together with Redditch Town itself. Urbanising influences also includes a scrap yard on site. Area 18 is in part a wooded plantation, open land with some allotments. Area 18 however is not Green Belt land and therefore this purpose is not strictly applicable. In conclusion therefore this purpose has some relevance in terms of determining site selection. In Areas 3 and 4 evidence of urbanising influences are already present and development here could therefore be viewed as an opportunity to contain further sprawl and encroachment. In Area 6 the topography, natural features and strong defensible Green Belt boundaries would perform this function.
- 9.29 Defensible Green Belt boundaries formed a key element in the Green Belt Review work. The ability to identify strong boundaries influenced the choice of developable areas within the larger study Areas for each Area. Strong boundaries were identified for Areas 3, 4 and 6. In Area 8 the strongest boundary lay at the northernmost boundary of the study Area at Storage Lane where negative impacts in terms of sprawl had already been identified. In Area 18, whilst not lying in the Green Belt itself, the Area has been identified as performing a valuable function in terms of Green Belt purposes of providing a visual and amenity buffer and preventing coalescence between Redditch and Mappleborough Green in neighbouring Green Belt land located across the County and Borough border in Stratford-on-Avon District.
- 9.30 The HGDS SA contains specific sustainability appraisal objectives of which Objective E2 covers Green Belt issues. It is a very generic and wide ranging objective as can be seen from the following *“Ensure efficient use of land through safeguarding mineral reserves, the best and most versatile agricultural land, land of Green Belt value and maximising previously developed land and reuse of vacant buildings where this has not been detrimental to open space and biodiversity interest”*. Therefore it has not been possible to assess Green Belt as a separate issue through the SA process. However it should be noted that as most of the Areas resulted in a loss of Green Belt land this objective scored negatively across the board.

### **Exclusion of Designated Open Space on the Periphery of the Town**

- 9.31 As stated above, intensive joint examinations of both the open space documentation and the entire SHLAA exercise, including a joint site tour of the Redditch area was carried out. The primary conclusion, which reinforces work done by RBC and WYG, was that there is not a hidden untapped potential in the Redditch urban area. A superficial view of Redditch might have suggested that there is but a focussed look at the evidence indicated that the high open space provision in Redditch is a result of the distinctive nature of the Town and additional urban capacity can only be found at the expense of some important assets, such as Arrow Valley Park and Morton Stanley Park. Detailed and on-site scrutiny suggested that there may be scope for a relatively small number of additional small to medium sized sites to be developed but even at best this was still less than a 5% increase in residential capacity. This has to be counter balanced by the significant risks to the development of a number of identified residential sites, especially in the District Centres. It was therefore concluded that there was not scope for increasing the residential capacity above the 4,500 figure for the 2006-2026 period at that time.
- 9.32 In the HGDS itself, the methodology was consistent with the previous conclusion regarding Open Space and the assessment rejected designated parks and open spaces from further investigation. Parks within Redditch were latterly considered in the HGDS Addendum but were not taken forward as Focussed Areas for detailed assessment.

### **The Importance of the Town Centre for Residents in Redditch**

- 9.33 Redditch Town Centre is the key location in the Town and a source of most shops and services for residents (and visitors) to the Town. An on-street survey completed in 2008 showed a snap shot of primary reasons for visiting the Town Centre; these were predominately shopping, followed by financial services, closely followed by education and social and leisure activities (Town Centre and Retail Study, 2008 [CDR 9.3A]. The primary role of the Town Centre is its retail function however residents from all over the Town and wider rely on it for much more than this sole purpose. For example it is home to Heart of Worcestershire (HOW) College, Redditch and Bromsgrove Council Offices, the Library, it also provides a source of employment and a transport hub for onward movements around the town and beyond.

### ***Retail and Leisure***

- 9.34 The main focus to the Town Centre is the Kingfisher Shopping Centre. Originally opened in the 1970's, the Kingfisher Centre is the main shopping area in Redditch and is one of the largest covered shopping centres in the West Midlands. The Kingfisher Shopping Centre is a major attraction for residents within Redditch, as it is a covered shopping centre, it attracts people regardless of the weather and especially in bad weather. It is host to numerous shops, cafes and restaurants and the cinema it is particularly appealing for families. There is currently 649,000 sq ft of retailing in Redditch Town Centre contained within 238 units (Redditch Town Centre Strategy, 2009) [CDR 9.2]. There is significant demand from retailers, convenience operators and service retailers (typically restaurants, cafes and take away

providers) to come to Redditch Town Centre, from brands such as Little Waitrose and Sainsbury Local.

- 9.35 The Kingfisher Shopping Centre also hosts the shopmobility service. This service provides assistance to visitors to the Town Centre that have difficulty walking and need equipment to help get around Redditch Town Centre. Shopmobility provide a range of equipment and support (for example, battery powered wheelchairs, scooters, manual wheelchairs, assistance for people to their vehicles and if necessary an escort). Shopmobility is very popular and provides an excellent service relative to national standards.
- 9.36 Whilst Redditch has no 'High Street', the traditional heart of the centre is around Church Green and St. Stephen's Church. Redditch has a long history as a market town and the current market is located in its historic position on Market Place adjacent to St Stephen's Church, Church Green. Independent retailers, charity shops, leisure uses and services are also located in this area.
- 9.37 The Palace Theatre and St Stephen's Church are key landmarks within the Town Centre, with the reputation of the former extending well beyond Redditch. The Palace Theatre is an important facility to support the evening economy, which is currently improving in the Town Centre. Its renovation in 2006 makes the Palace Theatre a go-to destination for both Redditch residents and visitors from further afield. Furthermore, the restaurant offer has recently improved in the Town, providing much needed choice for residents to stay within the Town for their evening entertainment, combined with the Cinema within the Kingfisher Centre; residents are now able to stay within the Town to enjoy these facilities. The Town Centre also hosts many of the Town's events, for example the bike race and singing in the bandstand. In particular for special holidays for example St. George's Day or Christmas activities, this is a major attractor for residents and visitors to the Centre.

### ***Transport Interchange***

- 9.38 The Town Centre, although not located in the centre of the urban area, is accessible from all parts of the Town. The road network within Redditch facilitates easy access onto the Ring Road which directly leads to multiple car parks within the Town Centre; this is a major attraction for residents and visitors who desire quick and easy access to the Town Centre, in particular the Kingfisher Centre.
- 9.39 The Town Centre hosts the Bus Station and Train Station, which are located next to each other and forms the transport interchange. The transport interchange supports frequent and easy public transport movements and provides a much needed means of travel for residents to be able to move in and out of the Borough easily. Having these facilities located in the Town Centre increases footfall through the Town Centre which can give rise to increase Town Centre spending. The Train Station has a regular rail link to Birmingham (three trains per hour into the City). Whilst the Bus Station is well served by local and wider services, which allows for easy onward movements and a very quick and easy destination for residents to access by bus. With a lack of private transport, residents can readily access bus services into the Town Centre, and if needed access onward travel easily. There are

numerous taxi ranks located in the Town Centre to also support movement for residents and visitors.

### ***Education, Employment and community services***

- 9.40 The HOW College is based within the Town Centre offering courses catering for those ranging from school leavers (16-19) and university level students to vocational training and part-time adult courses. The HOW College is an important feature of Redditch Town Centre and significantly contributes to the Redditch community and economy. The College operates from both Bromsgrove and Redditch campuses, catering for over 17,000 students and provides regular inter-campus public transport. Further expansion (circa 80,000 sq ft) and potential links to local universities could attract a variety of students of different ages to Redditch and prompt a future need for student residential accommodation within the Town Centre.
- 9.41 Trinity High School and Sixth Form Centre is located within the heart of Redditch Town Centre. Trinity is a specialist college for business and enterprise. The school is of average size, with 889 pupils aged between 13 and 18. Students enter the school in Year 9, and about a third, remain on into the sixth form. These facilities are a much needed resource for local students, whilst also providing a source of local employment.
- 9.42 The Town Centre provides some of the employment within the Town. Employment is provided through the retail provision and all supporting employment associated with this, such as financial services, office buildings, (including the Redditch and Bromsgrove Council Offices), with many residents looking to the Town Centre as a source of employment.
- 9.43 As well as the main functions detailed above the Town Centre is essential for many other services utilised by Redditch residents, such as Emmanuel Church and Ecumenical Centre providing community support. The Town Centre also provides much needed facilities by way of Doctors, Dentists and many other health related support services.
- 9.44 As can be seen above, the Town Centre hosts a range of facilities and activities that can be accessed by residents of Redditch and wider areas. Visiting the Town Centre is not exclusive to travelling into the Centre, as there are a number of residents who live in the Town Centre. Residents of the Town Centre are more likely to use it for their day-to-day activities.

### **Accessibility and proximity to the Town Centre and Local Centres**

- 9.45 There are no definitions that exist within planning guidance with regard to reasonable walking distances to town centres and local centre facilities. However, accessibility to the Town Centre is an important determining factor in the Area selection process as it is a fundamental aim of the NPPF and the Redditch and Bromsgrove Plans to reduce the need to travel. Therefore where possible, development should be located where it can support a thriving town centre and recognise the town centre as the heart of the community. It is important to ensure the viability and vitality of the Town Centre is supported (NPPF, Paragraph 23). To achieve this it is important that Redditch Town Centre is accessible by a range of means of travel. In the first instance physical proximity, which is supported by an easy walk into the Town Centre is important. It is also important for new development areas

to be supported by close and frequent public transport provision. Although it is accepted that new development will facilitate public transport provision it is advantageous if public transport already exists which can be enhanced and extended.

- 9.46 Area 6 is by far the closest Area to the Town Centre (2km), which confirms its advantageous location in terms of sustainability, especially when this is coupled with the frequency of public transport accessible from this location.
- 9.47 Areas 5 and 11 are the next closest Areas to the Town Centre at 3.3km and 3.6km respectively. Area 5 can increase its Town Centre accessibility due to its easy access to frequent bus services, unlike Area 11. Area 11 is physically isolated from the built form of Redditch, the walking route into the Town Centre would be along Brockhill Lane, which does not currently have footpaths, therefore does not facilitate an easy walk into the Town Centre.
- 9.48 Area 8 is 4.1km away from the Town Centre. This Area does not currently benefit from close access to public transport. As this Area is currently isolated from the built form of Redditch the walk to the Town Centre is along a footpath (which is very narrow in parts) which runs along a busy 'A' road and involves walking through an underpass. This does not facilitate an easy walk into the Town Centre.
- 9.49 Area 3 is slightly closer to the Town Centre than Area 4 (4.5km and 4.7km respectively). However Area 3 is slightly further from public transport than Area 4. The planned package of sustainable transport measures associated with the emerging development scheme on the Webheath ADR will improve the accessibility of Area 3 to the Town Centre through public transport provision. Area 4 has frequent bus provision within close proximity. With regard to walking to the Town Centre, the walk from this Area is simple, with the vast majority along one residential road (Bromsgrove Road).
- 9.50 Area 18 is the most distant the Town Centre at 5.3km of the sites looked at in the Focused Area Appraisal. However, this Area has the best access to public transport and therefore makes the physical distance of Area 18 to the Town Centre less of a barrier to sustainable development.
- 9.51 The purpose of local centres is to provide for day to day needs, supported by a limited range of other shops and non-retail services serving their local communities. In terms of accessibility to local retail facilities, development of this scale would necessitate delivery of new local centres as new local communities are created. Both the BORLP4 Brockhill East Strategic Site Policy (linked to Area 6) and the Cross Boundary Development Policy (in particular, linked to Area 4) specify the need for development to deliver these local facilities; as a result all new development will be within walking distance to a Local Centre. Therefore accessibility to the Town Centre is an important determining factor in the site selection process.

### **Public Transport Provision**

- 9.52 The NPPF is underpinned by the principle of sustainable development, which promotes sustainable transport and supports giving people a real choice about how they travel. For

plan-making in Redditch, this places an emphasis on the freedom of movement around the Borough to access local facilities, without placing undue reliance on car use. Paragraph 41 of the NPPF states that local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical to developing infrastructure to widen transport choice.

- 9.53 It is accepted that public transport provision to and within the urban/rural fringe of Redditch's built-up area is not particularly well served, and will remain so if the status quo of an area remains unchanged. However, the introduction of development to such an area would need to result in improvements to public transport access in that area to ensure proper integration into Redditch's built form. The ability to tap into and improve existing services, offers a viable approach to securing service delivery and could secure the longevity of existing services, which might otherwise be lost due to lack of patronage.
- 9.54 This desire to shift from car reliance towards increasing public transport use and other sustainable travel modes is reflected in emerging BORLP4 policy in relation to the Borough's wider sustainable travel network. Moreover, the emerging Cross Boundary Development Policy (RCBD1) specifies the need for significant improvements in passenger transport as a requirement for site delivery.
- 9.55 As a starting point towards understanding public transport provision serving the urban/rural fringe in the Focussed Area Appraisal, existing public transport provision was identified. However, since the publication of the HGDS and its Addendum, there have been several changes to bus provision serving the Redditch area, and these have been identified in Appendix j.
- 9.56 In order to ensure that this narrative reflects an accurate and meaningful portrayal of the bus services associated with the Focussed Appraisal Areas, the most up to date bus provision information has been presented in Appendix j for comparison purposes (grey rows relate to services no longer available, which were cited in the HGDS and green rows relate to additional services which could be accessed from other nearby bus stops with some additional walking). For the purposes of the HGDS and this analysis, a reasonable walking distance to public transport has been taken as less than 800m.
- 9.57 For the purpose of a comparative analysis across all Focussed Areas, week-day morning peak-time bus provision has been taken into account (Appendix j). In order to provide real choice to people and their ability to access sustainable transport modes (NPPF, para 29), consideration needs to be given to the frequency of services to enable them to reach workplaces within the Borough and beyond. Whilst it is acknowledged that Redditch has a plethora of primarily employment areas (predominantly on the eastern side of the Borough), residents need to access other workplace destinations, such as the Town Centre, local retail facilities, the hospital and other health, leisure and community facilities located elsewhere in the Borough. Therefore, accessibility to primarily employment areas is not necessarily an overriding concern. All services analysed terminate at the Redditch bus station in the Town Centre transport interchange, which offers provision to facilitate onward bus journeys. Furthermore, rail connectivity to Birmingham is easily accessible from this location with

three trains an hour servicing the Cross City line to Lichfield, via Birmingham New Street, from Redditch.

- 9.58 It can be seen from Table 2 below, that the services accessed from the nearest bus stops (X) in Areas 3 and 6 offer the most frequent a.m. peak-time services, equating to a bus approximately every 15 minutes. Area 4 benefits from the second most frequent bus service at half-hourly intervals.

Table 2: Bus frequency (AM week-day peak-time travel)

Area	3	4	5	6	8	11	18
<b>Frequency (approx.)</b>	<b>Mon-Fri AM Peak (before 9am)</b>						
10 mins							Δ <sup>‡</sup>
15 mins	X	Δ	Δ <sup>‡</sup>	X			
30 mins		X	Δ				
hourly			X		X	X	Δ
Nearest bus stop <sup>5</sup> (X)	Tynsall Avenue <b>1.6km</b> (ADR only 1.2km)	Foxlydiat PH <b>1km</b>	Tack Farm <b>700m</b>	Batchley Road <b>1.2km</b>	Birmingham Road <b>1.7km</b>	Cobb Barn <b>400m</b>	A435/Henley Rd <b>320m</b>
Additional services accessed <sup>6</sup> (Δ)		Tynsall Avenue <b>1.5km</b>	Foxlydiat PH <b>1.51km</b> Foxlydiat Crescent <b>1.54km<sup>‡</sup></b>		Icknield St/Papermill Drive <b>2.4km</b>		Millhill Rd <b>377m</b> Matchbro DC <b>1.58km<sup>‡</sup></b>
Distance to Redditch train stn	<b>4.3km</b>	<b>4.5km</b>	<b>3.2km</b>	<b>2km</b>	<b>4.3km</b> Alvechurch train stn <b>4.9km</b>	<b>3.8km</b> Alvechurch train stn <b>3.5km</b>	<b>5.3km</b>

- 9.59 Area 5 can only rely on an hourly service from its nearest bus stop. However, there is another hourly service accessible at the nearby Foxlydiat Arms Public House bus stop, which equates to a combined half-hourly bus service. Areas 4 and 5 can both improve service frequency from 30 minutes to 15 minutes when additional walking distances are taken into consideration (Tynsall Avenue and Foxlydiat Crescent bus stops respectively). The additional walking distances (Δ) far exceed the 800m reasonable walking distance, but they are comparable with that of the nearest bus stop in Area 3.

- 9.60 Areas 8 and 11 can only rely on an hourly a.m. peak-time service from their nearest bus stops. Area 11 has no alternative bus stop in close proximity to help improve bus frequency, whilst other bus stops in the vicinity of Area 8 do not offer an a.m. peak-time service.

<sup>5</sup> Distance from centre of Area to nearest bus stop

<sup>6</sup> Cumulative distance walked to access additional services

- 9.61 Area 18 has no a.m. peak-time service accessible from its nearest bus stop. However, if an additional walking distance is taken into consideration, Area 18 can access an hourly a.m. peak-time service. This additional bus stop falls well within the acceptable walking distance. Area 18 can further increase its accessibility to more frequent bus services (every 10 minutes) by taking account of an additional walking distance (to Matchborough District Centre), which is comparable to walking distances for Areas 3, 4 and 5 of around 1.5kms.
- 9.62 In terms of accessibility, Areas 5, 11 and 18 have bus stops within the 800m reasonable walking distance but can only access an hourly a.m. peak-time service from these stops.
- 9.63 In terms of frequency, Areas 3 and 6 benefit from the most frequent bus services, which are available from each Area's nearest bus stop. Although it should be noted that both of these bus stops exceed the reasonable walking distance by 800m and 400m respectively. If only the Webheath ADR is taken into account for Area 3, then the walking distance to the nearest bus stop is the same for Area 3 as for Area 6 (1.2km).
- 9.64 The frequency of the combined bus services accessible from Areas 3, 4, 5, 6 and 18 offer the greatest accessibility to onward journey movement from the Redditch transport interchange. Whilst Areas 3, 4 and 8 are all approximately the same distance from the railway station, onward rail travel from Area 8 is hampered by the less frequent bus service to the railway station. Although Area 8 is best placed to access Alvechurch railway station as an alternative, this movement is still hampered by the north-bound hourly bus service from Redditch. In order to effectively access rail travel from Area 8, commuters would need to drive or cycle to the stations.
- 9.65 In addition to onward commuting northwards to Birmingham, trip distribution analysis indicates journey movements westwards to Bromsgrove and beyond. Areas 3, 4 and 5 all benefit from an hourly a.m. peak-time service westwards to Bromsgrove bus and railway stations from their nearest bus stops. Area 8 is also capable of accessing direct services to Bromsgrove from its nearest bus stop, however this equates to only one a.m. and one p.m. journey (off peak), which makes Area 8 a less preferable location for development due to its limited access to multiple destinations via public transport.
- 9.66 In terms of promoting and improving access to the public transport network within new developments, Worcestershire County Council used its Accession Modelling software to analyse the accessibility of Areas 4, 6 and 8 by sustainable travel modes [CDB 8.15 and CDR 11.2] Bromsgrove and Redditch Cross-Boundary Sites Assessment]. The analysis indicates (para 3.3) that Area 4 is likely to be the most accessible in terms of local passenger transport services, but would require funding of an additional service routing or re-routing of an existing service in order to maximise the use of passenger transport from the site. The analysis also indicates that Area 8 would require significant investment in order to provide the necessary level of accessibility to/from the site to maximise the use of sustainable modes of transport from the site. In conclusion, whilst all Areas would require some investment, Area 8 is the least accessible [CDR11.2, para 3.4] and the most expensive to deliver.

9.67 Whilst accessibility to the public transport network is not an overriding plan-making criterion for the selection of growth areas, it is an important consideration as movement within and beyond development areas impacts on the accessibility to a wider level of services and facilities which complement growth areas but which are not necessarily located within them. In terms of public transport accessibility, Areas 3, 4, 5, 6 and 18 all have positive attributes to offer, whether it be frequency of services, shorter walking distances to services, greater diversity for onward travel or a combination of these factors. Areas 8 and 11 clearly have limited attributes to offer in this respect. Therefore, whilst it is acknowledged that all services could be improved upon through financial contribution, it is a logical assumption that existing and more frequent services would be easier and cheaper to enhance, indicating that the north-western arc (Areas 3, 4, 5 and 6) would offer a more preferable direction for growth than northwards (Area 8) in terms of sustainable travel.

### **Topography**

- 9.68 The topography of an area affects its ability to withstand and contain development. A number of the Areas are undulating to a greater or lesser degree, in particular Areas 3, 4, 6 and 11. However undulating topography can provide the opportunity for potential development containment.
- 9.69 The Area of Development Restraint (ADR) within Area 3 appears to be well contained by ridge lines (in particular Crumpfields Lane), which follow existing roads, providing the boundaries to the ADR. The remaining land within Area 3 falls sharply away to the south west, across the Green Belt land, with no appropriate ridge lines. The Housing Growth Sustainability Appraisal also suggests that development in this Area could lead to sprawl into the wider countryside due to the topography of the land (Page 26 para 4.46). The topography within the Area (with the exception of the ADR) does not lend itself to contain development.
- 9.70 Area 4 is undulating, notably the southern half of the Area is less undulating than the north. The Area gradually rises from Springbrook to Copyholt Lane and Holyoakes Lane which provides natural containment to the area within the lowest section of the site, East of Spring Brook. Within the most northwest section of Area 4 a ridgeline is perpendicular to the A448. This ridge provides a natural boundary to contain development in this section of the site.
- 9.71 A ridgeline within Area 5 runs along Hewell Lane. The site then slopes down towards the Batchley Brook, rising north towards Brockhill Lane. With regard to the natural extension of Redditch this Area does not provide any natural containment boundaries in topographical terms, as the strongest ridge lines run perpendicular the built up area. Therefore development could potentially sprawl up to Hewell Grange. However the land is well contained from the north and south and this provides strong buffers to the views into the Area from the Bromsgrove Highway.
- 9.72 Many of the Areas contain a high point of approximately 150m, with the highest recorded at Area 6 (156m high). Area 6 is the most undulating Area and contains the highest point of any Area. Area 6 rises towards the north and west, which provides what has been previously termed as the 'Redditch bowl'. The Redditch bowl is a phrase which describes the landform

surrounding the town notably that the northern and western edge of Redditch is of higher ground which provides a bowl shape, enclosing the Town. This provides strong ridge lines in which to contain development, contiguous with the Town.

- 9.73 Area 8s ridge lines within the site run north – south within the Area, which is perpendicular to the Town. The lowest part of the Area is within the southeast of the Area. The topography of this Area is such that it could not provide any natural containment to the extension of Redditch in topographical terms.
- 9.74 Within Area 11 the eastern section is mostly flat and rises up towards the train line in the west. There is a triangular shaped piece of land to the west within the Area (as identified in the HGDS), which describes the land from the railway heading west to the Area boundary. The land in this Area rises from the south towards Butlers Hill Wood. In topographical terms the ‘Western triangle Area’ appears that it could contain development through the lie of the land, where the ridge line corresponds with Butlers Hill Wood. To a lesser extent development may also be somewhat contained by the topography in the eastern part of the Area adjacent to Bordesley, however in topographical terms this would be difficult to contain heading north.
- 9.75 Area 18 contains the least undulating topography of all Areas and generally falls away north to south. Due to the Area’s shape and size, topography in this Area is not an overriding feature and therefore in topographical terms could lend its self to development.
- 9.76 In conclusion, topography is a significant determining factor when considering the most appropriate development Areas. Area 8 is considered to be unable to be contained by topography; neither does the topography provide any natural buffers from views into the site from elsewhere. Areas 3 and 5 also do not lend themselves well to containment from the lie of the land; however Area 5 is better buffered from wider views than Area 3.
- 9.77 Area 4, 6, 11 and 18 particularly lend themselves to be well contained by the surrounding topography.

### **Landscape**

- 9.78 All of the Focussed Areas are either classified by the Worcestershire Landscape Character Assessment as either Principled Timbered Farmlands (Area 3, 4, and 18 ) or the Wooded Estatelands landscape type (Area 5, 6, 8 and 11). Area 8 is primarily Wooded Estatelands with the northeast section being Principle Timbered Farmlands. Area 18 is predominately Principal Timbered Farmlands, with the most southern part of this Area classified as Riverside Meadows Landscape Type.
- 9.79 With regard to sensitivity, the Worcestershire Landscape Character Assessment (LCA) considers how sensitive an areas landscape is. The LCA defines sensitivity as;

*“The sensitivity of a given area of landscape represents the resilience of the attributes of that landscape, combined with a measure of their condition. In other words, sensitivity reflects the actual resilience of a given area of landscape, by relating the generic resilience of that*

*landscape to the degree to which its inherent character is present, reflected through the measure of condition of that landscape.”*

[http://www.worcestershire.gov.uk/info/20014/planning/1006/landscape\\_character\\_assessment/8](http://www.worcestershire.gov.uk/info/20014/planning/1006/landscape_character_assessment/8)

- 9.80 In summary, sensitivity has been calculated as the combination of resilience and condition. The classifications include low, medium and high (or a combination). Sites or landscape units that have been classified with high sensitivity would be most sensitive and least accommodating to change, on the basis of loss of landscape character; here a presumption would be against development on landscape character grounds. Those with medium sensitivity have moderate potential for accommodating change. Those with low sensitivity may be regarded as least sensitive to change and therefore most able to accommodate development (Worcestershire County Council Landscape Character Assessment Supplementary Guidance Technical Handbook August 2013).
- 9.81 Within the Focussed Areas all Areas are either predominantly medium (Area 8) or high (Area 3, 6, 11), or within a combination of these categories – Area 4 is medium to high, Area 5 is high with a small portion of medium sensitivity and Area 18 is a combination of high and medium sensitivity. These classifications are identical with regard to proposed developable area with the exception of Area 5. The proposed development area within Area 5 is wholly high sensitivity.
- 9.82 Whilst it is preferable for development to occur in areas of low sensitivity, all of the land around the periphery of Redditch is of medium or high sensitivity or a combination of the two, due to other overriding factors it was not possible for sensitivity alone to be a determining constraint that weighs against the choice of a particular Area. In addition no Area is deemed undevelopable due to its landscape type classification, Areas are able to be developed with their landscape type and sensitivity in mind and developed in accordance with the recommendations and guidelines set out in the Worcestershire Landscape Character Assessment.
- 9.83 Each Area has been assessed within the HGDS SA and Addendum. Within the Appraisal the consideration of landscape most closely aligns with Criteria E3 – ‘Safeguard and strengthen landscape and townscape character and quality’. The SA concludes that against this criterion Areas 4, 5, 6 and 8 are likely to have a negative impact on landscape character. However, the SA also states that to mitigate the impact on landscape and biodiversity, the design of the development will need to take into account the Worcestershire Landscape Character Assessment and any new development should explore opportunities to plan within the grain of existing historic field boundaries, hedgerow network or other defining landscape type characteristics and aim to restore and create hedgerows that complement the existing historic pattern.
- 9.84 In conclusion landscape is an important issue when considering potential development sites; however as all of the Areas around Redditch are either medium or high sensitivity it is unable to be a determining factor, due to other more important overriding factors.

Furthermore it is possible in Areas of high landscape sensitivity for development to occur as explained below.

Table 3: Landscape Sensitivity and Topography Containment for each Area

	Medium Sensitivity	Medium /High Sensitivity	High Sensitivity
Contained by topography		4 18	6 11
Not contained by topography	8		3 5

9.85 Area 8 is considered to be the least sensitive Area, but is not able to be contained by topography; neither does the topography provide any natural buffers from views into the Area from elsewhere. Area 4 and 18 are a combination of medium and high and do lend themselves to be well contained by the lie of the land. Other Areas that could be contained well by the surrounding topography are Areas 6 and 11; however these wholly fall into the high sensitivity category in landscape terms. Areas 3 and 5 are also both highly sensitive in landscape terms and do not lend themselves well to containment from topography, however Area 5 is better buffered from wider views than Area 3.

#### **Heritage Impact**

9.86 There is a requirement in the NPPF for Local Plans to set out a positive strategy for the conservation and enjoyment of the historic environment. Local Planning Authorities are required to identify and assess the significance of heritage assets that may be affected by a proposal, recognising assets as an irreplaceable resource and conserving them in a manner appropriate to their significance.

9.87 There will inevitably be an impact on the historic environment from new development; however, this can be managed through an approach that aims to mitigate the impact of development on particular heritage assets.

9.88 The use of maps/data from the Historic Environment Record (HER) and Historic England has been used to identify the known heritage assets falling within each of the Areas. The Worcestershire HER holds records on all aspects of the County's archaeology and historic environment, including archaeological sites, historic buildings, monuments and landscape features. Data from the HER has identified that there are heritage assets across all seven of the Focussed Areas, although the assets vary in significance.

#### **Listed Buildings/Designated Heritage Assets/Built form**

9.89 When considering the impact of proposed development on the significance of a designated heritage asset, the NPPF requires that great weight is given to the asset's conservation. The NPPF also recognises that the significance of a heritage asset can be harmed or lost by

development within its setting. For this reason, the potential impact on heritage assets outside of the Area boundaries has also been considered/assessed.

- 9.90 Area 6 and the reduced Area 11 contain no listed buildings. In terms of urban form, Area 6 has potential to integrate well with the existing built form of Redditch and, land to the south already contains the existing Brockhill estate. Area 11 is physically separate from Redditch therefore no urban connectivity is possible. For these reasons Area 6, and to a lesser extent Area 11, can be viewed positively in terms of these Areas' lack of built environment constraints.
- 9.91 Area 4 contains one Grade II listed building – Lanehouse Farm. The Hewell Grange Registered Park and Garden (Grade II\*) and Hewell Conservation Area are also located very close to the northern boundary of Area 4. A detailed setting assessment on the Hewell Grange Estate was carried out in accordance with national guidance in 2013 Hewell Grange Estate Setting of Heritage Assets Assessment [CDX 1.38] and this was updated in December 2015. This Assessment has resulted in careful consideration of the potential development boundary at the northernmost part of Area 4 and how any impact of development at Area 4 in relation to the Hewell Grange Estate, particularly on features such as the Water Tower and the Walled Garden can be mitigated. It is considered that harm may be mitigated by a defining an exact boundary for development. This is identified on Map 4 in the Setting Assessment and it is proposed to detail such boundary changes by proposed wording changes in policy RCBD1 and on the Policies Map.
- 9.92 Lanehouse Farm is located on Curr Lane, close to the centre of Area 4, just outside the proposed development boundary. The HGDS SA refers to the need for further surveys to examine the full extent of historic assets in Area 4. A further Setting Assessment has been carried out on Lanehouse Farm entitled 'Lanehouse Farm Setting of Heritage Assets Assessment'. This Assessment concludes that 'less than substantial harm' is caused by development and this harm, in any case, may be mitigated by the careful siting of development as defined on Map 2 in the Setting Assessment.
- 9.93 In terms of built form connectivity, Area 4 could connect well to Redditch's built form. Webheath would provide a clear urban connection and the A448 serves as a clear boundary and barrier to development. For these reasons there is evidence to suggest that built environment constraints can be mitigated against with a sensitive master planned design within Area 4.
- 9.94 Area 18 contains one Grade II listed building – Lower House. Lower House Farm is located in the northern part of Area 18. The Historic Environment Assessment notes the location of the Farm and the HGDS concludes that impact on the historic environment is likely to be limited. The outcome is that there are few built environment constraints which would prevent Area 18 as an allocation.
- 9.95 Area 3 contains five listed buildings. One of these is the Grade I listed Norgrove Court, four are Grade II listed:
- The Old Cottage (Grade II)

- Crumpfields Farmhouse (Grade II)
- Barn and stable about 30 yards north west of Crumpfields Farmhouse (Grade II)
- Wellbrook House (Grade II)

9.96 Although it was completed after the HGDS, a Setting Assessment for Norgrove Court was submitted to the Examination [XB1/2p]. In terms of built form connectivity, the ADR section of Area 3 offers good connectivity to Redditch's existing built form and would relate well to the urban area. Based upon the available evidence built environment constraints can be mitigated against with a sensitive master planned design within parts of Area 3.

9.97 Area 8 contains seven listed buildings which include:

- Lower Park Farmhouse (Grade II)
- Poplar Farmhouse (Grade II)
- Rose Cottage (Grade II)
- Dagnell End Farmhouse (Grade II)
- Cattle Shelter immediately west of Dagnell End Farmhouse (Grade II)

The designated heritage assets located in Area 8 are all located close to the boundaries of the Area; four of which are clustered together at the south of the Area at Dagnell End Farm. The HGDS SA refers to the need for further surveys to examine the full extent of historic assets in Area 8. In terms of built form connectivity, Area 8 is disadvantaged. The Area is poorly connected to Redditch because the Arrow Valley Park covers a substantial part of the area to the south. This is a significant reason why Area 8 was not considered to be a preferred area for development.

9.98 Area 5 contains nine listed buildings, Hewell Grange Registered Park and Garden (Grade II\*) and the Hewell Conservation Area. A detailed Setting Assessment on the Hewell Grange Estate has been carried out in accordance with national guidance (and is referenced in the HGDS) which helped to inform the conclusions in the HGDS. (This Assessment has recently been updated as abovementioned). The location and significance of the heritage assets located in Area 5 has resulted in this Area being ruled out for future development. In terms of built form connectivity, the Area could connect at Batchley.

9.99 Because of the significance of the effect of any decision to develop Area 5, a great deal of bearing can be placed upon the built environment as a factor influencing the decision making involved in the site selection process.

### **Historic Environment Character Zones**

9.100 The Historic Environment Assessment (HEA) for the Borough/District combines county landscape character mapping with Historic Environment Record (HER) data and an outline Historic Landscape Character Assessment to produce Historic Environment Character Zones (HECZ). The HECZs listed below are relevant to the assessment of the Focussed Areas:

HECZ 129: Mappleborough Green

HECZ 133: Holt End to Weatheroak Hill

HECZ 146: Callow Hill to Cruise Hill

HECZ 147: Upper Bentley

HECZ 148: Hewell Grange, Bordesley and Alvechurch

- 9.101 Each of the HECZs define an area of distinctive or related historic environment character and the maps provide a spatial guide outlining survival, potential and sensitivity. Two of the character zones have been subdivided and this has resulted in three sub-zones in HECZ 147 and eight sub-zones in HECZ 148.

### **Sensitivity to Change**

- 9.102 The HEA assesses each of the character zone's sensitivity to change, based on the impact of medium to large scale development. Where HECZs are subdivided, the sub areas are given a further sensitivity rating of high, medium or low/unknown.
- 9.103 While it would be preferable for development to occur in areas of low sensitivity, all except one of the Focussed Areas (Area 18) are either of high or medium sensitivity or a combination of the two. Because of this lack of distinction at a wider level, the sensitivity of the areas assessed is not a determining factor in the site selection process.

### **Statutory environmental designations**

- 9.104 There is an abundance of sites in both Bromsgrove and Redditch Districts covering national, regional and locally important environmental designations. Whilst the NPPF does not advocate development on important natural and environmental designations, it does state that the impacts on the natural environment should be minimised and provide net gains in biodiversity where possible (para 109). The NPPF goes on to say (para 110) that plans should allocate land with the least environmental or amenity value, where consistent with other policies in the Framework.
- 9.105 This approach underpins both the adopted and emerging Bromsgrove and Redditch Plans, which emphasises the importance of the natural environment to the Councils. Whilst it is not entirely possible to avoid development allocations in the vicinity of natural designations, it is possible to avoid particularly sensitive areas and to secure some biodiversity enhancements to existing designations through planning mitigation.
- 9.106 The HGDS SA [CDB 3.1 and CDR 3.2 clearly states at SA Objective E1 that further ecological surveys to examine the full extent of biodiversity in any Area would be required. This analysis is consistently translated into the BORLP4 SA [OED/33a] (SA Objective 11) for all 21 Areas, which states that all sites have the potential to mitigate against negative effects and have an opportunity to enhance biodiversity and geodiversity.
- 9.107 The Focussed Area Appraisals reveal that of the seven Areas, there are three which contain no statutory environmental designations; namely Areas 3, 4 (reduced) and 6. All other Areas (4 (full), 5, 8, 11, 18) contain one or two SWSs<sup>7</sup>, and Area 5 contains one SSSI. The analysis

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<sup>7</sup> The SWS (Special Wildlife Site) designation was changed to LWS (Local Wildlife Site) as a result of the NPPF publication. This change was rolled out by Worcestershire Wildlife Trust after the publication of the HGDS

also revealed that all seven Areas, without exception, have environmental designations adjacent to the Area boundaries. Development in Areas 3 and/or 6 offers the least impact on environmentally designated sites and emerging planning policy (BDP 21 Natural Environment) would ensure that the nearby environmental designations would be protected and enhanced if/where appropriate.

- 9.108 Development in Area 5 would be likely to have the greatest environmental impact due to the location of the Hewell Park Lake SSSI within the Area [CDX 1.1, p.96]. Furthermore, extra care would need to be taken when considering development in Areas 8 or 18, as both of these Areas have SSSIs adjacent to their boundaries (Dagnell End Meadow and Ipsley Alders Marsh respectively). However, development in Area 18 is unlikely to have an impact on Ipsley Alders Marsh as it is already surrounded by existing development [CDX 1.1, p.46], whilst any development in Area 8 would have to be carefully planned to ensure there is no undue impact on the statutory designation [CDX 1.1, para 6.4.12].
- 9.109 Whilst the location of statutory environmental designations has not been an overriding plan-making criterion for the selection of growth areas as mitigation is possible, it is still important to reduce any possible impacts and keep the requirement for mitigation to a minimum; Areas 3, 4 and 6 offer the most suitable locations, which would complement the decision-taking principles in the NPPF (para 118).

#### **Flood Risk**

- 9.110 The sections in the HGDS regarding flood risk were informed by the Level 1 and 2 Strategic Flood Risk Assessments carried out in January 2009 [CDB 10.13 and CDR 10.18] and June 2012 [CDB10.12 and CDR 10.5] respectively and the Water Cycle Strategy carried out in May 2012 [CDB 10.11 and CDR 10.6].
- 9.111 Flood zones are defined in the NPPG comprising flood zones 1, 2, 3a and 3b and different uses are acceptable in the different zones depending on their vulnerability. However it is generally considered development should be avoided in flood zone 3 if alternatives exist and certainly not for vulnerable uses.
- 9.112 The NPPF states at paragraph 100 that *“Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should be supported by Strategic Flood Risk Assessment and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies, such as lead local flood authorities and internal drainage boards. Local Plans should apply a sequential, risk-based approach to the location of development to avoid where possible flood risk to people and property and manage any residual risk.”*
- 9.113 The Bromsgrove District Plan Policy BDP 23 Water Management states that *“The Council will deliver safe developments with low environmental impact through:... c) Ensuring*

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(January 2013) but before the publication of the HGDS Addendum (November 2014). These designation references have the same environmental status.

*development addresses flood risk from all sources, follow the flood risk management hierarchy when planning and designing development, and do not increase the risk of flooding elsewhere. Where inappropriate developments in areas at risk of flooding are necessary after the sequential test is applied, appropriate designs, materials and escape routes that minimise the risk(s) and loss should be incorporated.”*

- 9.114 A Statement of Common Ground exists between Severn Trent Water Ltd, the Environment Agency, Redditch Borough Council and Bromsgrove District Council which includes amended wording within the Plan and all parties are satisfied and agreed in this respect (as described in Appendix h).
- 9.115 In relation to the Focussed Area Appraisal all seven Areas were assessed in terms of flood risk using the SFRA as evidence. The only Areas where flooding presents more of an issue was in Areas 8 and 11 where the flood zones from the River Arrow and Dagnell Brook in essence, contribute to severing the Areas from the built up form of Redditch making integration between old and new communities more problematic.
- 9.116 In the selected Areas 4 and 6, Area 4 has a small area of flood risk associated with Spring Brook but it is not considered that this would affect the development potential of the overall Area, rather that there may be development constraints in this particular vicinity. The majority of Area 6 falls within flood zone 1 which has the lowest risk of flooding and no historic flooding is recorded in Area 6. The remaining Areas 3, 5 and 18 all contain areas of flood risk as detailed in the HGDS and the SFRA.
- 9.117 It is considered therefore, that the presence of flooding is not a key determining factor in the site selection process. This is partly because relatively large study areas were examined and sites affected by flood zone 3 did not cover entire areas, Flood zone 3 generally presenting the highest risk in flooding terms. Therefore subsequently defined developable area boundaries could avoid such areas.
- 9.118 If flooding was identified as a risk factor in the Areas, it was generally regarded that this could be incorporated as a positive feature in terms of Green Infrastructure, for example, this could be designed into any development which, although this could affect overall site capacities likely to be achieved, it could be resolved at masterplanning stages of development.
- 9.119 The HGDS SA sustainability objective E6 covers flooding issues and refers to the Levels 1 & 2 Strategic Flood Risk Assessments (SFRA) in the commentaries for each Area. Scoring is related to the extent of historic and potential for flooding in each of the Areas. Most Areas consistently score negatively in this respect. Therefore in conclusion, it is considered that the presence of flooding is not a key determining factor in the Area selection process.

#### **Habitats and protected species**

- 9.120 Species and Habitats of Principle Importance are defined by the Secretary of State. The NPPG advises that guidance on statutory obligations concerning designated sites and protected species is wider than planning. Local Planning Authorities should take a pragmatic approach

– the aim should be to fulfil statutory obligations in a way that minimises delays and burdens.

- 9.121 The NPPF also advises that *“To minimise impacts on biodiversity and geodiversity, planning policies should....promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.”*
- 9.122 The Bromsgrove District Plan (BDP), Policy BDP 21 Natural Environment states that *“The Council will seek to achieve better management of Bromsgrove’s natural environment by expecting developments to:... e) Contribute towards the targets set out for priority habitats and species, the environmental priorities of the Local Nature Partnership, participating in the biodiversity offsetting scheme or its replacement, and connect to the Nature Improvement Area(s), the Living Landscape schemes or their equivalents, as appropriate.”*
- 9.123 The habitat types for all seven Areas have been identified as part of the Focussed Area Appraisal stage. It should be noted that where habitats have been identified of principal importance they are likely to be identified under statutory and non-statutory local designations such as Sites of Special Scientific Interest (SSSI), Local Nature Reserves (LNR), Local Wildlife Sites (LWS) (previously known as Special Wildlife sites (SWS). In relation to protected species, where information is available it has been recorded, otherwise it is recommended that appropriate surveys are undertaken. It is therefore considered that the type of habitat or presence of protected species is not a key determining factor in the site selection process, it is more a case that surveys should be carried out to investigate the habitat type if this is unknown and if protected species are found this would need to be mitigated as part of the development process or a licence sought from Natural England, should other factors indicate that such sites are selected.
- 9.124 The HGDS SA sustainability appraisal objective E1 is relevant and is worded *“To conserve and enhance biodiversity and geodiversity”*. This relates also to the statutory designations and if Areas contain nationally important sites this is reflected in the scoring system. Local sites are also identified and the need for ecological surveys recommended.

### **Trees and Woodlands**

- 9.125 All of the Areas contain trees, mature hedgerows and wooded areas to varying degrees and significance. The presence of trees and woodlands is not a significant determining factor with regard to developable areas, because for example, the presence of trees and woodlands can be preserved and enhanced as part of the Green Infrastructure provision. They also provide the opportunity to screen new development and act as strong boundaries to contain such development. In addition the presence of trees and woodland within the wider area can screen development that lies much further beyond, if the topography allows. However, it is acknowledged that the presence of trees and woodland on sites, in particular designated or protected trees or woodland, can reduce the net developable area due to the need for sensitive design around them.

- 9.126 The most densely covered Areas with regard to trees and woodland are Areas 5, 11 and 18 which include significant areas of woodland. Areas 3 and 4 each contain three woodlands, Area 6 contains two small areas of woodland, whereas in Area 8 tree cover is generally quite limited. With regard to potential developable areas, in the vast majority of cases the woodland detailed does not actually fall within the proposed developable area but forms part of the proposed boundaries (Areas 4, 5, to a small extent Area 6, and Area 11).
- 9.127 The HGDS SA and Addendum SA consider the presence of trees and woodland in relation to the sustainability of each potential development Area. In particular the presence of trees and woodlands most closely aligns to SA Objective E1 – *“To conserve and enhance biodiversity and geodiversity”*. The assessment of each Area against this objective acknowledges the presence of trees and woodland but stresses that although their presence could be a constraint to development and a number of trees may need to be removed to accommodate development (particularly mentioned with regard to Area 18), they also provide the opportunity to be preserved and enhanced, and provide a buffer to new development. However in general terms, with regard to the SA, the presence of trees and woodlands is deemed to be a weakness (Areas 3, 4, 11 and 18).
- 9.128 With regard to Tree Preservation Orders (TPOs) Area 3 appears to have an abundance of trees covered by TPOs. Area 18 contains blanket TPOs. Area 5 and 11 have few TPO designations. Areas 8 and 4 contain very few designations and Area 6 does not contain any TPOs. As stated previously the presence of TPOs within Areas does not render the entire Area undevelopable. Development would need to be sensitive to the presence of the designation; however the existence of the TPOs would provide a level of protection.
- 9.129 In conclusion, although some areas are more densely covered by trees and woodland than others this is not considered to be a determining factor with regard to the selection of Areas, and an individual Area is not considered to be at a particular disadvantage. In the majority of instances the woodlands within the Focussed Areas are not actually contained within the proposed developable areas. The presence of trees and woodland, although generally viewed as a constraint to development, can facilitate strong buffers and the extension of the Green Infrastructure network.

### **Public Rights of Way**

- 9.130 Whilst there is a difference in terms of the number, quality and significance of the rights of way that exist across the Focussed Areas, these factors have little to no bearing upon the decisions made regarding the proposed allocations. This is because the presence or not, of rights of way are not going to provide a significant constraint or opportunity that should be factored into decision making. Where there are rights of way these are not constraining as they can be contained appropriately within development and provide opportunities for that development or alternatively, potentially be diverted. Where there are no or few rights of way, it is not constraining because the benefits that rights of way do provide can be created within a development. Either way it is for the site design to masterplan the best approach.
- 9.131 Some Areas are referred to as having ‘several’ rights of way (Areas 3 and 4). The Addendum mentions that Area 18 has three rights of way but it is not directly compared with Areas 3 or

4. When looking at the number of rights of way to directly compare numbers, Area 3 has 12 distinct rights of way and Area 4 has 11 distinct rights of way.

- 9.132 Whilst Areas 3 and 4 may appear to have a disadvantage in terms of the large number of rights of way in comparison to other Focussed Areas, as abovementioned these are not necessarily constraints in planning terms which are viewed negatively. Their presence may add character and recreational possibilities to potential developments that other sites will tend to replicate for good urban design, in terms of permeability and creating usable spaces. The BORLP4 Strategic Site Policy for Webheath (within Area 3) has a specific criterion to require that public rights of way should be incorporated into any design proposals. The HGDS SA refers to Monarch's Way in the Area 3 and Area 4 assessments and provides a positive score against Objective S2 *"To improve the health and well-being of the population and reduce inequalities in health"*. There are also benefits in terms of the enhanced accessibility to the rural hinterlands of the Areas.
- 9.133 Areas 8 and 18 have three rights of way each, Area 5 and Area 11 have two rights of way each and Area 6 has no rights of way. These are insignificant in terms of their number and these Areas have little to constrain their design, but would need to sensitively incorporate new recreational and walking and cycling opportunities.
- 9.134 The Monarch's Way is a significant right of way in terms of its historic significance. This right of way is only located within Areas 3 and 4. The historic significance of the right of way has had no bearing on the decision making for allocations. Where the Monarch's Way crosses the Areas this provides a historic interest to the route which adds character and recreational possibility to the potential developments.
- 9.135 Area 18 contains footpath 800(c) which is also the route of a corridor style Special Wildlife Site known as the Ravensbank Drive Bridle Track. This is a significant right of way in terms of its environmental significance. The significance of the right of way is reflected in the way in which any statutory environmental designation is viewed in the HGDS. As a right of way it is no more or less of a constraint. Its significance relates to its SWS designation and not its significance as a right of way.
- 9.136 In conclusion, there is no rationale in terms of the number, quality or significance of a right of way which would justify one Area as being a potential allocation and another not. Rights of way has not been a key determinant when considering potential allocations and there is no distinction which would make one site any more or less favourable because of the presence of rights of way.

#### **Best and Most Versatile (BMV) Land and Agricultural Land Quality**

- 9.137 The NPPF requires that the economic and other benefits of the best and most versatile agricultural land is taken into account, and that where development is proposed areas of poorer quality land should be used in preference to those of a higher quality.
- 9.138 The agricultural land quality is not consistent within the Focussed Areas. All Areas contain land where the likelihood of the land being the BMV is between 20-60%.

- 9.139 Areas 3, 6, 18 contain the least amount of BMV agricultural land and Areas 4, 5, 8 and 11 contain larger amounts. Development at Areas 4 and 5 are the most sensitive, although Area 8 would also reduce the amount of higher quality agricultural land available on the edge of Redditch and also Area 11 to a lesser extent.
- 9.140 The development of lower quality land should take place in preference to higher quality; the situation around the Focussed Appraisal Areas means some loss of higher quality land is inevitable. It is acknowledged that the development proposed at Area 4 would result in more harm to the amount of the highest quality land than if development was focussed entirely on other Areas, although it is also the case that development on these other Areas particularly Areas 5 and 8 would also result in the loss of the highest quality of agricultural land. Looking at agricultural land in isolation, assuming Area 6 (and Area 3) remain unaltered as it/they perform preferably, the remaining amount of land that needs to be released can only be met in total on Area 4. Should Area 4 not be developed then the focus would fall on other Areas which also contain higher quality land, these Areas would not amount to the total quantum of development required. Therefore other Areas which either are not part of the current assessment would have to be identified with unknown consequences for BMV or sections of Area 4 would have to be brought back into the equation with the similar consequences for BMV that is the current position.
- 9.141 The HGDS SA contains specific sustainability appraisal objectives of which Objective E2 covers agricultural land. It is a very generic and wide ranging objective as can be seen from the following *“Ensure efficient use of land through safeguarding mineral reserves, the best and most versatile agricultural land, land of Green Belt value and maximising previously developed land and reuse of vacant buildings where this has not been detrimental to open space and biodiversity interest.”* The grading/classification of each Area has been included in the narrative and this has contributed to the overall scoring of this objective. All Areas score negatively in this respect.
- 9.142 The prevalence of agricultural land in the Focussed Appraisal Areas is an unfortunate reality of the type of land surrounding the urban area of Redditch. The existence of higher likelihoods of BMV and different grades of agricultural land is one which has been considered alongside many other factors in the decision making process informing the allocations being proposed, although not considered to be a key determinant when considering potential allocations.

### Distance to Medical Facilities

9.143 The following table details the closest GP Surgery and distance to the Alexandra Hospital from each Area.

Table 4: Distance to medical facilities

Area	3	4	5	6	8	11	18
Distance to GP	3.4km The Bridge Surgery	3.7km Millstream Surgery	1.8km Millstream Surgery	2.2km Millstream Surgery	2.85km Maple View Medical Practice	3km Alvechurch Medical Centre	1.29km Winyates Medical Centre
Distance to Alexandra Hospital	6.3km	7.8km	8.2km	8km	8.3km	7.8km	4km

9.144 As detailed above, some Areas are located further away from health services than others. In 2012, all GP practices were asked to agree an outer practice boundary. Outer practice boundaries are an expansion of a GP's original catchment area. This gives people the option to request to stay registered with their existing GP if they move. Following this change to the outer practice boundary, from January 2015, all GP practices in England are able to register new patients who live outside their practice boundary area. This means everyone is now able to register with practices in more convenient locations, such as a practice near work or closer to children's schools

(<http://www.nhs.uk/NHSEngland/AboutNHSservices/doctors/Pages/patient-choice-GP-practices.aspx>). This demonstrates that regardless of provision, patients now have a choice to decide where to go for their health care.

9.145 The Councils Infrastructure Delivery Plans (IDP) documents [CDR5.1 and CDB 1.13] set out the infrastructure required to support additional new cross boundary housing. These facilities can be provided regardless of the location of the housing. The IDPs are live documents and kept updated with information from the NHS.

9.146 With regard to the Alexandra Hospital, all sites are within a 10 minute drive therefore this is not a determining factor with regard to site selection.

9.147 In conclusion, as it is possible to select where you go for your GP provision and that GP provision will be delivered as part of larger housing schemes regardless, the provision of GP facilities is not a determining factor with regard to site selection.

### Distance to schools

9.148 Appropriate levels of school provision for Redditch related growth is determined by Worcestershire County Council (WCC) as Local Education Authority (LEA), in consultation with Councils, and takes account of population projections and the Plans' housing requirements. This approach is consistent with the approach advocated in the NPPF (para 72).

- 9.149 Whilst the NPPF principle of sustainable development promotes minimising journey lengths for education, amongst other things (para 37), it goes on to say (para 38) that where it is practical, particularly within large-scale developments, key features such as primary schools should be located within walking distance of most properties.
- 9.150 For the purpose of the HGDS, a reasonable walking distance to services and facilities (i.e. schools) is less than 3km. WCC operates statutory walking distances which equate to 2 miles (3.2km) for children up to the age of 8, and 3 miles (4.8km) for 8 to 16 year olds<sup>8</sup>.
- 9.151 With the WCC reasonable walking distances and the NPPF (para 38) in mind, it has been assumed that the most important education consideration for the HGDS is the proximity of First school provision. Table 5 below, gives details of the walking distances to the nearest First school facilities for each Focussed Area. The green rows indicate where nearby schools fall within the acceptable walking distances applied by WCC.

Table 5: Walking distances to nearest First school facilities

Area	3	4	5	6	8	11	18
<b>Walking Distance</b> (approx.)							
up to 1 mile (<1.6km)	X		X				X
1 to 2 miles (1.6 to 3.2km)		X		X	X	X	
2 to 3 miles (3.2 to 4.8km)							
over 3 miles (>4.8km)							

- 9.152 All Areas benefit from a First school within the reasonable walking distance for children up to the age of 8, with Areas 3, 5 and 18 offering school proximity considerably closer than the statutory walking distance. Redditch primarily operates a three tier school entry system (First, Middle and High schools), whereby pupils remain at First school until the end of Year 4 (the school year in which they reach 9 years of age). This means that the reasonable walking distance of 3 miles for children over the age of 8, makes the distances to First school in the Focussed Areas even more reasonable.
- 9.153 Based on Council consultation with WCC, the LEA has identified that large-scale development would require on-site additional First school provision as detailed in the Councils IDP documents [CDR5.1 and CDB 1.13]. This has been reflected in the cross boundary policy for Foxlydiate (Area 4/Site 1), whilst First school provision forms part of the Brockhill Strategic Site Policy in BORLP4, which will benefit the wider development at Area 6/Site 2. However, the ability to provide a First school as part of planned development is not limited to any particular Area and therefore no Area would be more preferable for development than another based purely on access to existing First school provision.
- 9.154 WCC has also indicated that existing provision at Middle schools and High schools across the town is adequate to accommodate future pupil numbers and this level of provision can be

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<sup>8</sup> Source: Information for Parents - Admissions & Transfers to Schools 2016/2017 (Statutory walking distances p.10)  
[http://www.worcestershire.gov.uk/downloads/file/6251/information\\_for\\_parents\\_booklet\\_2016\\_to\\_2017](http://www.worcestershire.gov.uk/downloads/file/6251/information_for_parents_booklet_2016_to_2017)

maintained and increased, as necessary, via developers' financial contributions as detailed in the Councils IDP documents [CDR5.1 and CDB 1.13]. There are fewer Middle schools than First schools and even fewer High schools across the town as part of the three tier system, making their close proximity to all residential development less of an issue but necessitating longer travel-to-school distances for older children. Longer travel distances and the proximity to Middle and High schools is much less of a determining factor in relation to growth Area selection; it is assumed that older pupils are capable of walking further and accessing public transport in order to reach school destinations.

- 9.155 Through school admissions policies, parents have the opportunity to state their school of preference, which may not necessarily be in the catchment area or be the local feeder school. Whilst this is an influencing factor for First school selection, it becomes a more prevalent parental choice throughout Redditch in terms of senior school places, whereby parents aim to secure Middle school places which feed into preferred High schools. Historically, preferred High schools in Redditch varies based on performance statistics/ Ofsted reports and can fall in and out of favour when it comes to parental choice.
- 9.156 Parental choice extends beyond the Borough boundary and Redditch experiences high numbers of pupils entering a two tier school system elsewhere, i.e. Senior school admission at Yr 7 (age 11) as opposed to High school admission at Yr 9 (age 13). Primarily, senior school places are sought at Studley High School, Alcester Grammar School and King Edwards Grammar Schools (Birmingham and Stratford). This clearly indicates that parents are choosing educational opportunities over more extensive travel-to-school journeys.
- 9.157 As stated previously, it is assumed that older children are capable of travelling greater distances with appropriate levels of supervision as necessary. Furthermore, if public transport is required to reach schools further afield, children will be expected to walk up to 1 mile (1.6km) to their designated boarding/ alighting point, i.e. a bus stop<sup>9</sup>. However, in addition to accessibility to public transport identified elsewhere in this document, there are dedicated school bus services which run from Redditch Town Centre or Webheath to Ridgeway Middle School (within Redditch Borough but beyond the limits of the urban area), from Webheath to Tudor Grange Academy (senior school) and from Redditch Town Centre (and other locations in Redditch) to Alcester schools via Studley. This emphasises the point that longer travel-to-school journeys for older children, which incorporate public transport use are considered acceptable.
- 9.158 In conclusion, any Area is capable of delivering additional and appropriate First school provision, as identified by the LEA, any Area is capable of accessing Middle and High school facilities in a manner which is considered appropriate by the LEA, thereby limiting the importance of accessibility to education provision as a determining factor in relation to growth area selection.

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<sup>9</sup> Source: Information for Parents - Admissions & Transfers to Schools 2016/2017 (Statutory walking distances p.10)  
[http://www.worcestershire.gov.uk/downloads/file/6251/information\\_for\\_parents\\_booklet\\_2016\\_to\\_2017](http://www.worcestershire.gov.uk/downloads/file/6251/information_for_parents_booklet_2016_to_2017)

## **Infrastructure capacity**

### **Water**

- 9.159 Evidence informing this issue is provided by the Water Cycle Study 2012 [CDB 10.11 and CDR 10.16] and meetings with the Environment Agency and Severn Trent Water Ltd (STWL). The Statement of Common Ground (SOCG) between the Environment Agency, STWL, RBC and BDC is also of evidential relevance to this issue [Hearing Statement B4/1 Statement by Bromsgrove District Council] (please also see Appendix h). One of the issues covered in the SOCG related to the lack of adequate reference to the source protection zone and ground water protection in Area 4 (Foxlydiate). Policy wording changes were included in the SOCG and these were identified in the Schedule of Proposed Minor Changes document [CDB 1.3].
- 9.160 The existing situation is explained in the HGDS in terms of water quality, explaining which rivers/tributaries/brooks/streams that the Sewage Treatment works discharge to and existing issues with water quality, wastewater collection and the potential impact of new development, current capacity at sewage treatment works, and potential for expansion.
- 9.161 It discusses potential issues with the development of each Area. It concludes that Area 8 performs most strongly regarding sewerage issues on the basis that it would be the cheapest in water infrastructure terms as it is closest to the existing infrastructure i.e. trunk sewer. However all Areas would utilise either Priestbridge or Sernal STWs both of which have minimal current capacity but have no land or other constraints preventing expansion. It is understood that all development may be serviced in this respect with differing cost implications for Severn Trent but in strategic terms there are no 'showstoppers'. All development has the ability to impact on water quality and increase demand for water meaning that this particular factor is not a determining factor in the site selection process. It is recommended that the water conservation hierarchy is followed in all cases and this is reiterated in Policy BDP23 Water Management (BDP 23.1 b)
- 9.162 The HGDS SA discusses this issue under sustainability objective E8 which although wide ranging is "*to protect and enhance the quality of water, soil and air quality*". The Water Cycle Study is referenced in this narrative, however an unknown value is consistently entered in the scoring as all development has the potential to impact on water quality and increase demand for water usage. Other issues such as the potential for contamination would be considered at planning application stage.

### **Education**

- 9.163 No site specific information is provided in the HGDS to enable Area by Area comparison of this infrastructure type. General information was provided by WCC in this respect that development of this quantum would require the provision of two new First schools but the assessment of the need for a Middle school would be done at a later time when needs could be accurately determined in terms of projections, the numbers of houses built, where they were built and demographics. The Councils were advised by WCC Childrens Services as part of Stakeholder consultation on the Infrastructure Delivery Plans (IDP) [CDB 1.13 and CDR5.1] that the location of development would need to be determined before specific details could be provided on whether new schools would be needed or whether there would be capacity

in local schools to cater for projected demand. This is mentioned in the IDP and in the Consultation Report on issues and options [CDB 4.7]. It is therefore considered that this is not a determining factor in the Area selection criteria in that wherever development is proposed the WCC would respond appropriately to demand for services.

- 9.164 The HGDS SA Sustainability objective EC3 is *“to raise the skills levels and qualifications of workforce and quality of educational opportunities for all”*. In the narrative relating to this objective the proximity of Areas to educational establishments i.e. schools/colleges and employment is discussed.

### **Transport**

- 9.165 The evidence contained in the Transport Network Analysis and Mitigation reports [CDB 8.14] including Bromsgrove and Redditch Cross-Boundary Sites Assessment [CDR11.2] forms the basis for the assessment of the transport merits of each Area. As can be seen the cumulative impacts of the different Areas are felt in different locations, the destinations people will travel to from these Areas are both local and long distance, therefore the impacts are felt far and wide as well as in close proximity. No location or locations that have been assessed as part of the Focussed Area Appraisal has demonstrated that the required highway infrastructure is a barrier for development, the mitigation strategy is based on achievable interventions rather than focusing on single large solutions which would be more problematic to deliver.
- 9.166 The work has been undertaken in manner that assesses the impact of different development options on the highways network and then identifies the mitigation required to make that option acceptable in planning terms. Part of the selection process focussed on a number of scenarios which were developed to test combinations of Area options rather than Areas in isolation, this was done as it became clear that not one single Area would be able to contain the quantum of development required therefore the impacts of a range of Areas would need to be considered.
- 9.167 The main impacts of all scenarios tested are large numbers of trips from the Areas ending to the north in the conurbation and into Bromsgrove Town and Redditch Town Centre. The location within the conurbation is affected by whether or not the A448/A38 route is used as this provides better access to areas to the north and west of the conurbation such as the Black Country via the M5/M6 motorways. The option of spreading the development across a larger spread of Areas closer to the built form of Redditch was also tested, this helps to spread the load of trips although, this option became less achievable due to the heritage constraints on Area 5. The chosen option of Areas 4 and 6 provides advantages as it provides better integration with the existing residential areas, and can physically accommodate the level of growth required. The scenario tested which includes Area 8 would focus trips on Redditch more than other scenarios although wouldn't not allow the required level of growth to be met unless site boundaries for this location were extended beyond the already weak Green Belt boundaries identified for this location.
- 9.168 The HGDS SA sustainability objective S5 covers *“Increased sustainable travel choices and move towards more sustainable travel patterns”*. The need to travel in relation to accessing

services/facilities affects the scoring on this objective with negative scoring if travel by private car is identified as being necessary and limited access to public transport.

- 9.169 In conclusion, the highways infrastructure can, with the interventions identified, accommodate the development identified; the different scenarios tested have not led to any objections from either Worcestershire County Council or Highways England and progress is now being made on delivering the improvements required in the form of a major scheme bid for improvements on the A38 corridor in Bromsgrove and the delivering of LTP3 scheme associated with Redditch's infrastructure.
- 9.170 In terms of promoting and improving access to the public transport network within new developments, Worcestershire County Council used its Accession Modelling software to analyse the accessibility of Areas 4, 6 and 8 by sustainable travel modes [CDR 11.2 Bromsgrove and Redditch Cross-Boundary Sites Assessment]. The analysis indicates (para 3.3) that Site 4 is likely to be the most accessible in terms of local passenger transport services, but would require funding of an additional service routing or re-routing of an existing service in order to maximise the use of passenger transport from the site. The analysis also indicates that Site 8 would require significant investment in order to provide the necessary level of accessibility to/from the site to maximise the use of sustainable modes of transport from the site. In conclusion, whilst all Areas would require some investment, Site 8 is the least accessible (para 3.4) and the most expensive to deliver.
- 9.171 Whilst accessibility to the public transport network is not an overriding plan-making criterion for the selection of growth Areas, it is an important consideration as movement within and beyond development areas impacts on the accessibility to a wider level of services and facilities which complement growth areas but which are not necessarily located within them. In terms of public transport accessibility, Areas 3, 4, 5, 6 and 18 all have positive attributes to offer, whether it be frequency of services, shorter walking distances to services, greater diversity for onward travel or a combination of these factors. Areas 8 and 11 clearly have limited attributes to offer in this respect. Therefore, whilst it is acknowledged that all services could be improved upon through financial contribution, it is a logical assumption that existing and more frequent services would be easier and cheaper to enhance, indicating that the north-western arc (Areas 3, 4, 5 and 6) would offer a more preferable direction for growth than northwards (Area 8) in terms of sustainable travel.

### **Health services**

- 9.172 Provision of additional health services to meet increases in population would not require or rely on Area-specific analysis. Consultation has been undertaken with NHS Property Services and the Redditch and Bromsgrove Clinical Commissioning Group and all health service requirements are detailed in the IDP, which accompanies the Plans.
- 9.173 Hospital-based services are coordinated at a County-wide level across three main sites and at other specialist units. Therefore, specific and localised infrastructure delivery for hospital provision is not considered to be a determining factor for Area selection.
- 9.174 With respect to GP surgeries, NHS Property Services advise that new surgeries need to be accessible to the community they serve. The purpose of local centres is to provide for day to

day needs, including non-retail services, such as health facilities, serving their local communities. In terms of accessibility to local health facilities, development of this scale would necessitate delivery of new local centres as new local communities are created. Both the Brockhill East Strategic Site policy (linked to Area 6) and the cross boundary policy (in particular, linked to Area 4) specify the need for development to deliver these local facilities. This provision would be required irrespective of Area selection and is therefore not a determining factor in this process.

### **Conclusions on Relevant Criteria for Area Selection**

9.175 As can be seen, a wide variety of factors have been considered as part of the Area selection process. In the context of Redditch, some factors have been more relevant to the differentiation of Areas than others. Factors which weighed more heavily in the Area selection process were as follows:

- Sites already removed from the Green Belt to meet development needs
- Purposes of including land in the Green Belt
- The ability to identify of a strong defensible Green Belt boundary
- Accessibility to the Town Centre
- Topography
- Heritage Impact
- Ability to integrate with existing built form and communities in Redditch
- Potential to provide improvements for existing communities
- Ability of Areas to accommodate a sufficient level of growth sustainably.

9.176 Factors which individually were not key to determining Area selection were as follows:

- Impact on Public rights of way
- Trees and woodlands
- BMV agricultural land
- Infrastructure capacity- water, transport and health
- Accessibility to employment, schools and health services
- Flood risk
- Landscape sensitivity
- Statutory environmental designations
- Habitats and protected species

9.177 All of the factors above have been examined. There is not one factor which has determined Area selection but rather a number of factors which when considered cumulatively point to a preferable site or sites. Some factors such as land already removed from the Green Belt (ADR land) and land with good accessibility to the Town Centre have been more influential in Area selection. The process has been informed by the SA, including the consideration and rejection of reasonable alternatives. The conclusions on the choice of sites selected as allocations and the reason for the rejection of other sites considered in the Focused Area Appraisal are detailed in Chapter 16.

## Consideration of Alternative Scenarios

- 9.178 In his Post-Hearings Note of July 2015, the Inspector requested a further overall conclusion to the HGDS. He accepted the way in which the HGDS (Main report and Addendum) provides the basis for excluding 18 Areas from more detailed analysis in light of the Broad Area Appraisal. This includes Areas 3A and 7, which as explained above were excluded on the basis that they are important areas of public open space within the Town, with Area 7 scoring poorly against the SA sustainability criteria. This is carried through to the HGDS Addendum where the 18 Areas are listed in paragraphs A4.84 and A4.86. It demonstrates that all reasonable alternatives, including ADR land (Areas 18 and part of Area 3) and the large peripheral parks (Areas 3A and 7) have been examined as part of the SA process.
- 9.179 The Inspector's request was for an overall conclusion to be drawn about the suitability of the Areas considered in the HGDS and associated SA process, which were considered in the Focused Area Appraisal and the choice of those Areas carried forward into the Local Plans as allocations. This is made clear in paragraph 9 of his July 2015 Post -Hearings Note. He described this as a comparative assessment. It is explained in the conclusions to this narrative why Areas 4, 6, 18 and part of 3 (3R) have been allocated as housing sites, and why Areas 5, 8 and 11R have been rejected.
- 9.180 It has not been judged necessary to conduct any further SA work in respect of the individual Areas, as all of the Areas (including the Areas within Redditch Borough, i.e. ADR component of Area 3 (3R), 3A, 7 and 18) were considered in the HGDS and the HGDS Addendum in both the text and the Assessment Matrices. But what the Inspector did request in his Post-Hearings Note of July 2015 was an update to the original scenarios for looking at Areas in combination (paragraph 10c). It is not considered appropriate to look at all possible combinations of the 7 Areas because these are numerous and clearly the Area selection decision is being made on the basis of most suitable Areas to emerge from the selection process. These are Areas 4, 6, 3R and 18. However, the Inspector wanted the scenarios set out in the original HGDS to be updated and this has been done below and four additional scenarios have been examined.
- 9.181 It should be noted that multiple small sites around the periphery of Redditch were not considered per se, as part of the scenario testing as this was not considered to be a reasonable alternative, although reduced Areas of larger Study Areas were considered. This was due mainly to the quantum of new development required and the need to provide sizeable sites so that adequate infrastructure could be provided to service new developments. It is considered important that the new communities could link well to the existing urban area. If a large number of smaller sites were selected this would very likely put a strain on existing infrastructure rather than providing the economies of scale required to enable the provision of new and adequate infrastructure.
- 9.182 As stated above *"In order to achieve the required unmet housing requirement of 3,400 dwellings it was found that due to identified developable areas and estimated capacities, a single area would not be capable of delivering the required level of housing and therefore a combination of areas would be required"*. This reiterates para 7.21 of the HGDS.

9.183 Please see the SWOT analysis in Appendix I. for the full range of strengths, weaknesses etc. associated with each of these Areas.

9.184 As stated elsewhere in this narrative the housing requirement for Redditch Borough is 6,400 dwellings for the period 2011-2030. The identified capacity of the urban area of Redditch when the HGDS was carried out was 3,000 leaving 3,400 dwellings to be provided cross boundary in Bromsgrove District.

9.185 The original scenarios in the HGDS did not consider Areas within Redditch Borough and ADRs were viewed as a 'given' as detailed in para 2.59 above. However as the Inspector requested that Areas within Redditch be included in the scenario testing specifically Area 3R (Webheath ADR) this means that capacity figures for the urban area of Redditch need also to be brought into the equation again to ensure that double counting does not ensue. Therefore the scenarios below identify the capacity figure for Redditch where either the Webheath ADR (Area 3R) or the A435 (Area 18) contribute to a particular scenario.

9.186 Therefore four additional scenarios have been identified as follows:

- 1) 3R, 4 and 6
- 2) 6, 8 and 18
- 3) 4, 6 and 18
- 4) 3R, 4, 6 and 18

9.187 These are now discussed in further detail below. Drawing on the most recent site commitments monitoring for RBC (Dec 2015), an identified urban capacity which includes completions within the Plan period, equates to 2,751 dwellings. This figure excludes both the Webheath ADR and the A435 ADR for the purpose of assessing the following scenarios and to ensure there is no double counting.

**1) 3R, 4 and 6**

**Capacity**

RBC-	2,751
Area 3R-	600
Area 4-	2,800
Area 6-	<u>600</u>
	6,751 approximate overall capacity

9.188 Area 3R is located to the west of Redditch's urban area within Redditch Borough and is known as the Webheath ADR. It lies to the rear of properties on Crumpfields Lane, Church Road and Pumphouse Lane. The site has also been assessed in the Redditch SHLAA and is considered suitable, available and capable of delivering housing within the Plan Period. Detailed planning permission has now been secured (December 2015) for 200 dwellings on the northern part of the site. Area 4 is located to the north western side of Redditch's urban area within Bromsgrove District. The Bromsgrove Highway (A448) borders the north eastern edge of the Area. Area 6 is located to the north of Redditch and is bounded by Weights Lane to the north and Brockhill Lane to the south and west. Land to the east of the

railway and bounded by Weights Lane has detailed planning permission for 200 dwellings and 5,000 sqm of employment land and last to the west of the railway has detailed permission for a further 296 dwellings.

- 9.189 This scenario provides sufficient capacity to cater for Redditch's housing needs. This scenario does not include Area 18 which would provide an additional capacity of 200 dwellings which could offer greater flexibility within the allocation figure in relation to site delivery throughout the Plan period, which was an issue discussed at previous Hearing Sessions. In terms of Area 3R its strength lies in the fact that it is not in the Green Belt and was specifically excluded from the Green Belt to meet the future housing needs of Redditch. This is hugely significant in terms of its suitability as a site for development. The Area is surrounded by existing development on three sides. Although none of these Areas would be physically linked it is considered that they all relate well to the existing urban fabric of Redditch.
- 9.190 On balance this scenario can be considered a reasonable alternative as it does provide sufficient capacity to cater for Redditch's overall needs.

## **2) 6, 8 and 18**

### **Capacity**

RBC-	2,751
Area 6-	600
Area 8-	1,000
Area 18-	<u>200</u>
	4,551 approximate overall capacity

- 9.191 As described above Area 6 is located to the north of Redditch and is bounded by Weights Lane to the north and Brockhill Lane to the south and west. Area 8 is located to the north of Redditch to the north of Dagnell End Lane and Area 18 is located close to the A435 to the east of the Borough. All three Areas are unconnected. Area 18 however is an existing ADR and its strength lies in the fact that it is not designated Green Belt land and is also included as suitable, available and capable of delivering housing within the Plan Period. Whilst two of the Areas relate well to the existing urban form of Redditch (Area 6 and Area 18) it is not considered that Area 8 does this and there is an identified lack of connectivity between this Area and the Town Centre. A larger number at Area 8 is not promoted by the developer and would be problematic in terms of drawing a defensible Green Belt boundary.
- 9.192 On balance this scenario cannot be considered a reasonable alternative as it does not provide sufficient capacity to cater for Redditch's overall needs.

### **3) 4, 6 and 18**

#### **Capacity**

RBC-	2,751
Area 4-	2,800
Area 6-	600
Area 18-	<u>200</u>
	6,351 approximate overall capacity

9.193 This scenario differs from scenario 4) below as it excludes Area 3 which would provide capacity for 600 dwellings and therefore does not fulfil the overall capacity needs. However as mentioned above Area 18 is an existing ADR and its strength lies in the fact that it is not designated Green Belt land. These three Areas are unconnected and this scenario would to some extent spread development around the Borough.

9.194 On balance this scenario cannot be considered a reasonable alternative as it does not provide sufficient capacity to cater for Redditch's overall needs.

### **4) 3R, 4, 6 and 18**

#### **Capacity**

RBC-	2,751
Area 3R-	600
Area 4-	2,800
Area 6-	600
Area18-	<u>200</u>
	6,951 approximate overall capacity

9.195 This scenario differs from scenario 1) above as it includes Area 18 which provides an additional 200 dwellings and therefore fulfils the overall capacity needs. Again as abovementioned Areas 3R and Area 18 are existing ADRs and the strength of this scenario lies in the fact that less Green Belt land would need to be utilised than some other options. This is hugely significant in terms of their suitability as sites for development.

9.196 On balance this scenario is a reasonable alternative as it does provide sufficient capacity to cater for Redditch's overall needs and could offer greater flexibility within the allocation figure in relation to site delivery throughout the Plan period, which was an issue discussed at previous Hearing Sessions. This is the scenario which was finally put forward as the preferred option, albeit Areas 3R and 18 formed part of the urban capacity figure within Redditch.

9.197 It is not considered necessary to change the SA to the BORLP4 of May 2015 (the most recent SA) because it already includes a comparative assessment of all the Areas, summarised in Appendix D including Areas 3A, 7 and 3R (described as Webheath Strategic Site (part of Area 3); and 18 (described as A435, part of Area 18).

## 10. SITE CAPACITIES

### Site Capacities and Density Calculations

- 10.1 For the purpose of identifying site capacities, especially in the context of the SHLAA as the evidence to underpin housing supply for Bromsgrove and Redditch, the Councils have taken account of site specific indicative schemes where available (in accordance with SHLAA Guidance). In the absence of an indicative scheme, net developable areas have been applied to sites to allow for infrastructure provision, which was first proposed in the original SHLAA documents [CDB 7.7, page 8 and CDR 7.11a, para 6.19]. This equates to 85% of the gross site area for sites between 1ha and 2ha, and 65% of the gross site area for sites over 2ha. There were no objections to this approach when the SHLAAs were consulted upon and it has therefore continued to inform site capacity estimates. Density calculations have been based on a 30dph capacity. However, development schemes which have since come forward through the planning process generally demonstrate that 30dph is a conservative estimate as 30dph is exceeded in most cases.

### Emerging site capacities

- 10.2 With respect to the Webheath ADR, the 200 dwellings with planning consent equate to 27dph on a discounted site area of 65%, based on the developer's approved site scheme. 'Discounted' refers to the site's net developable area rather than a gross site area. This discounted site area was based on constraints that are present on this site such as the topography, and therefore a reduced capacity was required. If the same level of discount is applied to the remainder of the ADR, based on anticipated constraints then this equates to a net site area of 16ha.

Site area calculation: 16ha x 30dph = 481 dwellings

- 10.3 Therefore, taking the consented 200 dwellings and the estimated 481 dwellings, sufficient capacity has been identified to support the 600 dwelling allocation. Based on the constraints that are present on the northern site it is anticipated that these constraints could be expected in the southern site, therefore applying the same 27dph to the southern part of the site would allow flexibility to take additional site constraints into account.

Site area calculation: 16ha x 27dph = 432 dwellings

- 10.4 With respect to Brockhill, the gross site area for the Redditch Green Belt and ADR land is 53.23ha, which equates to a net site area of 34.6ha. Multiplied by a density assumption of 30dph equates to a capacity of 1,038 dwellings, making the RBC capacity assumption of 1,025 dwellings realistic. Applying the same discounting assumptions to the Bromsgrove Green Belt, the gross site area of 35.61ha equates to a net site area of 23.15ha. Multiplied by a density assumption of 30 dph equates to a capacity of 694 dwellings. The emerging BDP currently allocates only 600 dwellings on this land, however, the above calculation has been substantiated by the developer through their response to consultation where it was stated: *"The identified area of the Brockhill East Strategic Site within Bromsgrove District has a capacity of about 700dw taking account of the assessed constraints. This justifies amending the indicated site capacity from 600 to 700 dwellings."* (Proposed Submission stage, Rep

No.s: XB015 and B093). In light of the SHLAA Guidance which places a preference for capacity assumptions on indicative schemes, where available, it would be appropriate to increase the Bromsgrove Green Belt capacity at Brockhill from 600 to 700 dwellings. No significant constraints to compromise delivery of this level of development have been identified.

- 10.5 Turning to Foxlydiate, during the preparation of the HGDS options, as with other Areas the gross development site area identified in Area 4 was also discounted by 65% and a density multiplier applied, understanding that there were no significant constraints to development. This broad approach to site capacity is acceptable in SHLAA terms in the absence of a detailed masterplan and formed the starting point for progressing the detail of the Foxlydiate site. The developer produced a masterplan and detailed discussions with planning and conservation officers has resulted in revisions to the masterplan which removes some development from areas regarded as having particularly high levels of sensitivity. The identified constraints, both on and off site have been mitigated against through amendments to the design process and the revised masterplan indicates that delivery of 2,800 dwellings is still realistic and achievable. It is pertinent to note that no statutory consultee objection has been raised with respect to the type and density of the proposed development in the vicinity of the groundwater protection zone, therefore this is not considered to be a major constraint capable of affecting site capacity and delivery. Furthermore, in relation to the identified pipeline exclusion zones, these have been incorporated into the site's Green Infrastructure network and also have no impact on site capacity or delivery.

## 11. DELIVERY AND PHASING

- 11.1 It is essential that the preferred development location(s) is realistic in terms of delivery. Following the detailed assessment of Areas through the HGDS and other evidence base studies (as detailed in this document) it is clear that based on the proposed boundaries, which were defined based on sound planning reasons and judgement, one site alone would not be capable of delivering the required 3,400 dwellings. Therefore a combination of at least two of the sites would be required.
- 11.2 Due to the nature of the housing market area and the need to deliver housing in a phased approach it could be an added advantage for the housing market that development is located in multiple locations.
- 11.3 The deliverability of all of the Focussed Area sites was considered through the HGDS. It is essential the selected sites can be delivered. The NPPF requires that sites are identified that are deliverable within five years and sites are also identified that are developable within 6-10 years. Due to the quantum of growth required development will be needed over at least a 15 year period for the identified sites. The NPPF defines deliverable as, *“sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable”* (page 12, footnote 11).
- 11.4 Both Bromsgrove and Redditch Councils have a five year housing land supply (5YHLS). Redditch has 5.05 years supply and Bromsgrove has 5.55 years supply. Furthermore, both Councils are in a positive position with regard to delivery in terms of completions and commitments.
- 11.5 The 1 November 2015 Monitoring results for Bromsgrove show an increase in the number of completions since the last update (Jan 2015) of the 5YHLS when the total net completions was 184. There were 334 Completions at 1 November 2015. The total future commitments within the 5YHLS period has also increased from 1295 (Jan 2015) to 1489 Commitments at 1 November (2015).
- 11.6 With regard to Redditch, although there is still an under provision of completions for the Plan period to date (765 dwellings), the housing trajectory in the 5YHLS indicates an upturn in the development industry following the recent economic downturn. In the 2014/15 monitoring period, RBC achieved its annual average completion rate (337 dpa) for the first time since the recession, indicating a growing confidence in the housing market. The trajectory indicates that the 2015/16 delivery rate will fall short of the annual average (202 dwellings); however this is only due to the lead-in times of several large sites coming to market at the same time rather than a lack of confidence in the improving market. Developers delivery schedules and hence the 5YHLS trajectory reflect this position and show a year on year improvement on site delivery from the 2016/17 period onwards for Redditch. Three large scale development sites at Webheath and Brockhill ADRs recently gained reserved matters consent, which underpins developer confidence and the improving housing market.

- 11.7 The 1 November 2015 Monitoring Update, for the purpose of the Local Plan Examination, indicates 84 completions to date with construction ongoing across several large and small scale development sites in the Borough, which will contribute to the 2015/16 full monitoring period next year. The total future commitments within the 5YHLS, including sites under construction has increased since 1 April 2015 from 2,520 dwellings to 2,601 dwellings.
- 11.8 As outlined in this document the selected sites required to accommodate future housing growth for Redditch in Bromsgrove District are Foxlydiate and Brockhill. 2,800 dwellings are to be accommodated within the Foxlydiate site and 600 within the Brockhill site. As well as residential development, both the Foxlydiate site and the Brockhill site will also deliver a First school, a Local Centre and associated community infrastructure. The Foxlydiate site is needed within the first five years of the plan period to ensure a five year land supply for Redditch, whereas Brockhill will not be needed until years 6-10, due to the construction and completion of earlier Strategic Site development phases on ADR land and Redditch Green Belt land.
- 11.9 Many years of discussions with the developers of these sites and stakeholders has led to detailed conclusions relating to the delivery of these sites, timing, infrastructure required and location of development on the site. These discussions have led to masterplans for both sites which are ready to be submitted as outline planning applications.

#### Foxlydiate

- 11.10 The Councils have received certainty from the Developers that this site can commence delivery within five years. They anticipate that 2 or 3 housebuilders will be on-site providing simultaneous delivery and sales outlets. The Developers have confirmed private sales across the Plan period of an average of 120 per year, which would assume 2 or 3 developer/ sales outlets collectively achieving sales of around 10 per month. In terms of the initial years of the Plan period, they demonstrate that 461 dwellings could be built between 2016 and 2020, which would equate to an average of around 92 plots per year and which would realistically reflect an initial reduction of output as site infrastructure and build programmes are implemented.
- 11.11 The Developers examined key historical trends and the record of delivery of housing in comparable scenarios, which is supported by analysis of the emerging national economic position regarding residential development and how this translates to local market conditions.
- 11.12 There are a number of reasons to support why the delivery of the cross-boundary development sites are realistic at this time (which is supported by the Local Residential Property Market Review produced by Heyford Developments, 2014):
- National market conditions – The housing market is rapidly improving following a period of economic uncertainty.
  - Regional market conditions – The housing market is improving, although faster in London and the South East and there remains an imbalance between supply and demand.

- Local market conditions – Current house prices in Redditch and Bromsgrove suggest that new build will be affordable and market demand is strong with all national housebuilders looking to acquire land in order to deliver new sales outlets.
- Affordable housing- need remains high.
- Historical Build Rates demonstrate that comparable rates of delivery were achieved in similar scenarios.

11.13 There are historically several local examples in Redditch (Brockhill) and Bromsgrove (Oakalls and Breme Park) where large scale housing developments have delivered between 118 and 195 open market dwellings per annum. These sites are broadly comparable to the Foxlydiate site in terms of size, location and home purchase profile and demand. Analysis of completion rates for these sites provides comparables to the potential for delivery rates at the Foxlydiate site. For example Brockhill, Redditch delivered 1,283 units in 9 years (1996/1997 – 2004/2005), equating 142.5 per annum (+7 in 2005/06).

#### Brockhill

11.14 Development at the Brockhill cross-boundary site is adjacent to the Brockhill Strategic Site allocated through the emerging BORLP4. It is logical that this site will be developed in phases, with the Green Belt land within Redditch being developed in advance of the Green Belt land within Bromsgrove. A masterplan has been submitted by the Developers which demonstrates how the entire Brockhill area (including the Redditch and Bromsgrove Green Belt) will be delivered. Developers indicate delivery of the Brockhill ADR will average 65dpa, but could rise to 120dpa on future Green Belt phases when access to the site is also available from the Weights Lane portion of the Strategic Site. Two reserved matters consents were granted on 9 December 2015 for 496 dwellings, adding to the certainty of delivery for the development industry.

## **12. CONSULTATION ON PREFERRED OPTIONS**

### **2013 Housing Growth Consultation**

- 12.1 This joint consultation built on the previous Redditch Growth Options Consultation held in 2010. This consultation did however go into further detail and identified specific sites to accommodate the required levels of cross-boundary growth. These sites are located to the west and north of Redditch at Brockhill and Foxlydiate.
- 12.2 A range of consultation methods were again used including 'drop-in' events. A total of six events were held in different locations within both Bromsgrove District and Redditch Borough and at different days and times over the consultation period, including weekends and evenings, in some instances. This gave everyone an opportunity to attend, regardless of whether they worked full-time or were on holiday for some of the events.
- 12.3 In total, 456 individual responses were received to Housing Growth Consultation. Views were expressed by many different groups, businesses, developers and individuals who either live or work or have an interest in the District. Further information can be found in the Consultation Statement [CDB 1.6]

### **13. SUBMISSION AND CONSULTATION OF THE REDDITCH AND BROMSGROVE LOCAL PLANS**

#### **Proposed Submission (September - November 2013)**

#### **Submission (March 2014)**

- 13.1 Both the Bromsgrove District Plan and the Borough of Redditch Local Plan No.4 were published for Proposed Submission for a six week formal representation period from 30<sup>th</sup> September to 11<sup>th</sup> November 2013. All representations received were published on both Councils websites. Both Plans were then submitted to the Secretary of State on 12<sup>th</sup> March 2014.
- 13.2 1345 bodies or individuals made representations on BORLP4 1,253 representations were copies linked to Action Group representations, therefore 111 made separate representations. 147 bodies or individuals made representations on the Bromsgrove District Plan.
- 13.3 In total there were 68 respondents submitting cross boundary representations. Although representations aren't recorded in terms of household numbers, the Councils received some multiple representations from the same household. Therefore to understand the scale of the response 68 respondents interacted at Proposed Submission stage and there are 34,065 households in Redditch and 38,290 households in Bromsgrove (2011 Census) indicating a low response rate.
- 13.4 During the Proposed Submission consultation, in terms of Legal Compliance there were no objecting representations received relating to the working relationship or Duty to Cooperate matters between Redditch and Bromsgrove.
- 13.5 The Councils were aware that on many occasions the representations sought allocations at alternative sites. There are many examples of representations being received from people living near to proposed development and suggesting that development would be better at a different Focussed Appraisal Area. This illustrates that the need for development is not disputed but rather its close proximity to those objectors.
- 13.6 Full details of all the issues raised is recorded in the Bromsgrove Regulation Section 22 1 c v Report [CDB 1.7] from page 12 onwards and in the Redditch Statement of Representations Regulation 22 (i) (c) (v) [CDR 1.9] page 28 onwards.
- 13.7 No objections received from Statutory consultees remain unresolved. These have largely been dealt with via meetings, minor wording changes to the Plan(s) and/or more formal mechanisms such as Statements of Common Ground (SOCG), please see Appendix h.

#### **14. INITIAL LOCAL PLAN EXAMINATION PROCESS**

Please see appendix i for timeline of the EiP process so far and for further details.

- 14.1 Joint Examination hearing sessions commenced in June 2014 to examine two issues only, namely the Objective Assessment of Housing Need (OAHN) and the Duty to Co-operate (DTC). On 17<sup>th</sup> July 2014 the Inspector's Interim Conclusions were received. This concluded that further work was required on the OAHN for Bromsgrove, however an OAHN figure of 6,300 was set by the Inspector for Redditch. Redditch-only hearings were to go ahead in September 2014. Both Authorities were deemed to have met the DTC.
- 14.2 The Redditch hearings were duly convened from 23-25<sup>th</sup> September 2014. These sessions covered the Redditch Local Plan No.4 as a whole and also covered the cross boundary issue in part, so far as it related to the 5 year housing land supply (5YHLS). The HGDS methodology was also discussed at these hearings. This led to further work being requested by the Inspector on 3<sup>rd</sup> October 2014 to consider two further Redditch Borough sites excluded from detailed consideration in the HGDS. This Addendum to the HGDS and update to the Sustainability Appraisal was submitted to the Inspector in November 2014.
- 14.3 Additional work on the Bromsgrove OAHN was submitted by BDC in September 2014 and it was then confirmed by the Inspector that the Bromsgrove only hearings sessions could recommence in December 2014. Bromsgrove only hearings sessions were held between 2<sup>nd</sup> and 4<sup>th</sup> December 2014, which excluded any consideration of the cross boundary sites as the Inspector wished to examine this issue jointly with Redditch at a separate hearing session.
- 14.4 Meanwhile, a delay had been requested to the cross boundary hearing sessions, which was approved by the Inspector. These postponed hearings were held over two days in June 2015. The Inspector issued a note in July 2015 requesting that further work be carried out to clarify site selection. An updated position on the following matters was also requested; 1) 5YHLS, 2) Gypsy and Travellers, 3) Housing Standards, 4) Renewable Energy.
- 14.5 The Councils submitted a timetable of proposed works to the Inspector in September 2015 and the Inspector responded to the effect that less extensive work and a shorter timescale was required. The Councils responded that the less extensive work could be completed and submitted by 30th December 2015 and this was accepted by the Inspector.

## **15. FURTHER WORK CONDUCTED AS PART OF THE EXAMINATION PROCESS**

### **15.1 26 March 2014**

The Inspector wrote to both LPA's warning of potential soundness concern and requesting that the OAHN is explicitly stated in both Plans following discussion of the SHMA at the South Worcestershire Development Plan EiP.

The Councils response to the Inspector [ED/2] was sent on the 8 April 2014. The additional scenario testing by Edge Analytics is contained in the Amion Report [CDB 13.3 and CDR 17.1]. The additional scenarios contain explanatory text as to whether the scenarios are suitable, both in terms of the actual scenario or the evidence base used.

Sensitivity Scenario 4 is proposed as the most appropriate scenario as it is considered to be realistic attempt to take into account the likely changes within the conurbation over the Plan period.

### **15.2 10 April 2014**

The Inspector responds that two hearing dates will take place on 16/17 June 2014 to cover the OAHN and Duty to Co-operate and also identifies further concerns in relation to Transport evidence; gypsies and travellers; flood risk and groundwater supply and housing land supply.[ED/3 and ED/4]

The Councils response to the Inspector was sent on 1 May 2014 (ED/5) and is summarised in the following sections.

#### **Transport Evidence Base**

The Councils informed the Inspector that any information or evidence in respect of the matter of post 2022 transport implications would be progressed in time for hearings and that liaison with Worcestershire County Council and the Highways Agency were ongoing. SOCG as detailed was subsequently agreed.

#### **Provision for Gypsies and Travellers**

The Councils informed the Inspector that the joint GTAA for the 6 Worcestershire Districts had slipped its original intended publication date but was estimated by the consultants that the final report would likely be published in June 2014.

#### **Flood Risk and Groundwater Protection**

The Councils informed the Inspector that they had addressed the issues raised in by EA and STWL at the Proposed Submission Stage through the proposed changes to the Plan published in CD 1.3 Schedule of Minor Recommended Changes. No further evidence was provided by STWL to justify a site-specific water conservation target for policy RCBD1 and that the revised policy wording and BDP27 Water Management would be adequate to address the issues.

SOCG as detailed was subsequently agreed.

### **Housing Land Supply**

The Councils informed the Inspector that they are currently both working on new housing completion data for 2013-2014.

#### **15.3 7 July 2014**

The Inspector requested BDC to provide clarity on, 1) how the three employment forecasting methodologies have addressed the matter of commuting, 2) How this has been reflected in the three employment forecasts? 3) It is not clear which of the three sets of projections have been taken forward to generate the employment land requirement, 4) The relationship between the labour market evidence presented in the ELR and that set out in the NWHN report and whether these two documents present a consistent picture? [PIH/1]

BDC responded to the Inspector's questions on the 14 July 2014 [PIH/2].

1. The methodologies for the three individual employment forecasts were forwarded to the Programme Officer and added to the document library.
2. AMION consulting confirmed that there were differences in how the three employment forecasting models addressed the matter of commuting.
3. Additional and amended information in table form was provided to the Inspector from WM Enterprises.
4. To aid comparison WM Consulting provided a table of local levels of demand for employees in employment and self-employment. WM Enterprises confirmed that there is a fairly strong and consistent relationship between the labour market evidence presented in the ELR and that set out within the NWHN Report.

#### **15.4 July 2014**

SOCG Environment Agency, Severn Trent Water Ltd, RBC and BDC SOCG (July 2014) [B4/1]  
<http://www.hwa.uk.com/site/wp-content/uploads/2014/09/Bromsgrove-DC3.pdf>

The main concern was in relation to the protection of groundwater resource in Site 1 Foxlydiate. It is agreed by all parties that with regard to the Protection of Groundwater Quality, in view of the size of the development sites and the types of use proposed, the proposed minor amendments to the policies is considered sufficient for protecting the quality of groundwater in Bromsgrove District. Due to the geology of this area, STWL modelled the effect of urban development on the groundwater recharge rate. The reduction is estimated to be in the range of a 20-30% over the site area, representing approximately a 3% overall reduction. Both EA and STWL considered the water conservation target outlined in Policy BDP23 Water Management a realistic target to compensate the reduced recharge rate. However, given the uncertain outcome of the Housing Standards Review and that there is site specific evidence to justify the water conservation target, it is agreed that the target set out in BDP23.1(b) would be repeated as a criterion under the cross boundary policy namely RCB1.9.

**15.5 4 September 2014**

The Inspector requests BDC to categorically state what its OAHN is [ED/15]

BDC responded to the Inspector on 25 September [ED/15a] stating that the Objectively Assessed Housing Need figure is considered to be 6,648 dwellings. Work by AMION and BDC submitted on 1 September [ED/13 and ED/14] produced average figures from Sensitivity Scenarios 3a and 3c (5,540 dwellings) with market signals providing an additional 20% uplift (6,648 dwellings). The result from the further work was that the requirement for housing in the District is to remain the same at 7,000 dwellings.

**15.6 September 2014**

SOCG West Mercia Police, Hereford & Worcester Fire and Rescue Service and RBC (Sep 2014)[OED/3]

[http://www.hwa.uk.com/site/wp-content/uploads/2014/09/Statement\\_of\\_Common\\_Ground\\_-\\_Final.pdf](http://www.hwa.uk.com/site/wp-content/uploads/2014/09/Statement_of_Common_Ground_-_Final.pdf)

This Statement of Common Ground has been developed in response to representations received from West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS) on the Proposed Submission version of the BORLP4.

It is agreed that minor amendments to Policy 40 (and its Reasoned Justification), Objective 7 and other minor amendments to the Plan is considered sufficient to ensure there is a focus on the infrastructure necessary for policing, emergency services and fire safety measures.

It is also agreed that in order to address some of the concerns raised, a specific policy and guidance on evening and night-time economy will be provided in the forthcoming Allocations Plan, which will be prepared following the adoption of the BORLP4.

**15.7 3 October 2014**

The Inspector's Note issued following RBC hearing sessions in September which raised concerns regarding the site selection process for the cross boundary sites as two sites within Redditch Borough were excluded from the analysis. Also recommended that the BORLP4 Sustainability Appraisal is revisited [ED/19].

RBC wrote to the Inspector on 7 October [ED/20] with modifications to Policy 16 Natural Environment and Policy 30 Town Centre and Retail Hierarchy. RBC also informed the Inspector that further work on the Site Selection Methodology and Sustainability Appraisal would be submitted before the December hearings. RBC also clarified that the removal of the middle section of site 211 (Area 18) was unlikely to adversely affect the five year land supply calculation as additional identified capacity could more than compensate.

**15.8 6 November 2014**

RBC submit additional work on HGDS Addendum and accompanying SA and BORLP4 SA Refresh [ED/22].

Document [CDR 18.23] Redditch Sustainability Appraisal Refresh (November 2014) explicitly explains why some sites are selected and some are not and includes all 21 sites irrespective

of their locations within Redditch or outside of Redditch Borough. As well as this, document [CDX 1.47] Addendum to the Housing Growth Development Study and the Housing Growth Sustainability Appraisal was submitted to ensure the previously discounted areas were assessed to the same level as the existing areas in the Study.

#### 15.9 **November 2014**

SOCG West Mercia Police, Hereford & Worcester Fire and Rescue Service and BDC (Nov 2014)

[http://www.bromsgrove.gov.uk/media/1057818/WMP\\_-\\_BDC\\_-\\_SoCG1.pdf](http://www.bromsgrove.gov.uk/media/1057818/WMP_-_BDC_-_SoCG1.pdf)

This Statement of Common Ground has been developed in response to representations received from West Mercia Police (WMP) and Hereford & Worcester Fire and Rescue Service (HWFRS) on the Proposed Submission Version of the Bromsgrove District Plan (BDP).

An addition criterion to be added to BDP12 to ensure the policy is not too onerous for emergency services. The wording to be included is as follows, "When applying these tests to specific proposals the Council will have full regard to the specific characteristics, needs, service priorities and objectives of the service and/or organisation concerned."

In addition it is agreed reference to an Evening and Night-time Economy SPD would be included in Appendix V1 underneath heading 'New Supplementary Planning Documents'.

#### 15.10 **November 2014**

SOCG Highways Agency, Worcestershire County Council, RBC and BDC (Nov 2014) [B3/1]

<http://www.hwa.uk.com/site/wp-content/uploads/2014/09/Bromsgrove-DC2.pdf>

The Statement sets out the confirmed areas of agreement between 'the parties' with regard to the Bromsgrove District Plan 2011-2030 and supporting Infrastructure Development Plan (IDP).

It is recognised by all parties that further collaborative work is necessary to identify the scope and form of required highways and other transport infrastructure and services and funding mechanisms to deliver the required growth in Bromsgrove post 2021 for its own needs, the wider area and those potentially emanating from Birmingham City.

There is a commitment between all parties to continue the productive and close collaborative working going forward. The work going forward aims to ensure appropriate modelling, assessment and design work is carried out, schemes of mitigation identified and support in preparing and submitting funding bids, and securing essential developer contributions through s106 and CIL process and to secure adequate funding to deliver planned development to the satisfaction of all parties over the Plan period.

On this basis, the parties agree that the Bromsgrove District Plan reflects a proportionate level of transport evidence to demonstrate that subject to ongoing assessment work its provisions are deliverable over the Plan period and that the Plan is sound.

A number of Proposed Changes have been agreed in the Infrastructure Delivery Plan (Live Document) February 2014.

#### 15.11 **2-4 December 2014**

BDP Examination Hearing sessions (Agendas ED/24, ED/25 and ED/26). Inspector requested further work is carried out:

- 1) Further monitoring to be carried out by end of December and an updated position on the 5YHLS to be produced and consulted on for 2 weeks and reported back to Inspector by 26 January 2015
- 2) GTAA Council to write to consultees who made representations and ask for comments on updated GTAA allowing 2 weeks for responses (until 5/1/15) and the results to be reported back to Inspector
- 3) The retail floorspace proposed minor amendment to increase provision by 16,283m<sup>2</sup> to be consulted on with all adjoining LPA's and responses to be collated by BDC and sent to Inspector.

BDP carried out the works and consultations requested by the inspector.

- 1) The Updated 5YHLS was published on the website on 6 January 2015 [CDB 14.8] The 5YHLS at 31 December 2014 was calculated at 5 years 3.7 months. Three responses were received regarding the update to Bromsgrove's 5YHLS. All three of the responses did not consider the findings of BDC to be accurate, with two of the respondents questioning the use of a 5% buffer rather than a 20% buffer [Consultation responses OED/20, OED/20a, OED/20b, OED/20c, OED/21 and OED/22] .
- 2) The information on the GTAA consultation was sent to the Inspector in January 2015 [CDB 13.10]. There was only one response to the GTAA update from the National Federation of Gypsy Liaison Group, and they were supportive on the GTAA findings apart from one area. They felt that any excess over supply over the assessed need should be discounted in projecting ongoing need.
- 3) The response on the retail provision from neighbouring authorities was published on the website on 29 January 2015 [OED/23 through to OED/30]. All of the respondents to the consultation either had no concerns or no comments on the proposed amendment to increase the provision of floorspace by 16,283m<sup>2</sup>.

#### 15.12 **24 March to 5 May 2015**

Consultation on the revised SA's [OED/39 and CDB 3.12]

The Councils collated the responses from the consultation and sent a letter to the Inspector on the 18 May 2015 [OED/33] with the attached documents: representations table [OED/35]; Justifications Table for changes made to the Redditch SA [OED/33b]; amended Redditch SA (May 2015) [OED/33a]; and Updated Bromsgrove SA (May 2015) [OED/34].

**15.13 17 June 2015**

The Inspector requests Overview Statement to be published on website by 19 June 2015 (On Examination Page under 19 June 2015).

The Inspector requested the following matters be addressed: The chronology of events since 6 October 2014; Explanation of the outcomes of these events in respect of the plans; the sustainability appraisal evidence; and Earlier correspondence in relation to sustainability appraisal.

**15.14 19 June 2015**

Overview Statement published on both Councils websites .

**15.15 June 2015**

Statement of Common Ground between Bromsgrove District Council and Historic England [OED/37]

<http://www.hwa.uk.com/site/wp-content/uploads/2013/10/SOCG-Historic-England-Final.pdf>

The purpose of this SOCG is to resolve the concerns expressed by Historic England with regard to Gorcott Hall. Minor revisions have been agreed to ensure harm to the setting of Gorcott Hall is minimised and the significance of the Grade II\* listed building is safeguarded. The changes agreed include a new paragraph (8.67) on page 33 of the submitted Plan and a new footnote to be added in relation to the Ravensbank site as in table 3 of the submission Plan on page 34.

**15.16 10 July 2015**

The Inspector's Post Hearing Note [ED/35] stating that further work was required to clarify site selection including evidence and SA. The Inspector asked what authorities intend to do either withdraw or do extra work and confirm intentions by 16 July 2015.

The Inspector asked for further work detailing the site selection and methodology, especially concerning Area 4 and Area 5. Further work on the impact on Hewell Grange was requested as well as the Councils positions on the 5YHLS and Gypsies and Travellers and changes to Housing Standards and Renewable Energy requirements.

The Councils sent a joint letter to the Inspector on the 16 July 2015 setting out that the Authorities did not wish to withdraw and would draw up a programme of additional work required with timescales by September 2015 [ED/36].

The Councils informed the Inspector of a proposed work programme on the 15 September to provide further evidence in order for the examination to reconvene, with a proposed provisional date of January 2017 (ED/37).

#### 15.17 **21 September 2015**

The Inspector responded requesting that less extensive work be carried out with a shorter timescale to complete the work [ED/38].

The Councils respond on the 22 October 2015 with a revised proposal, outlining the intention to submit further work to the Inspector by 30th December 2015 [ED/39]. The Councils stated they would prepare a narrative of all the evidence including the Housing Growth Development Study. The narrative is intended to give the rationale of the selection of the proposed allocations and include the Councils positions on the 5YHLS, Housing Standards, Gypsies and Travellers and Renewable Energy. Additional Heritage Assets Work evidence would also be submitted.

#### 15.18 **December 2015**

The Councils have submitted further information to the Examination that will be available for consultation until Tuesday 16<sup>th</sup> February at 5pm. An outline of each document is provided below.

##### Narrative of the Site Selection Process

A narrative is being submitted to the Examination entitled 'Narrative on the Site Selection Process for the Growth Areas at Redditch'.

This is the narrative to explain the extensive evidence and the process by which the Councils have evidenced their proposals for the allocations for housing to meet Redditch's housing requirement.

It concentrates on the rationale for the seven 'focussed areas' that were taken forward for further assessment and clearly explains why the evidence suggests that some of these areas contain the best sites for allocation in the two Plans and why some do not.

In your note of the 18<sup>th</sup> September you ask for the available evidence to be presented in a manner that demonstrates that all seven areas have been assessed in a comprehensive and co-ordinated way and that the councils should explain their choice with reference to the evidence. This has been done. Attached to this letter is the intended approach to be adopted in the Local Plans.

##### Updated Heritage Evidence

Updated heritage evidence is being submitted to the Examination entitled Hewell Grange Estate: Setting of heritage assets assessment (December 2015) and Lanehouse Farm: Setting of heritage assets assessment (December 2015).

##### Hewell Grange Estate Setting of Heritage Assets Assessment

The Hewell Grange Document was originally prepared in 2013, and considered the potential impact of development at Area 5, on the setting of the Heritage Assets at Hewell Grange, namely the Conservation Area and the Registered Park and Garden.

At the Examination the Inspector queried the possible impact of development at Area 4 on these Heritage Assets, bearing in mind the proximity of the boundary of the site with the boundary of the Conservation Area. He also considered that, in terms of the setting of heritage assets, Area 4 and 5 had not received a comparative level of analysis. The original report made reference to Area 4 at para 1.2 as follows:

*'Part of the western boundary of the RPG and the Water Tower are visible from the northern part of Area 4. The A448 dual carriageway forms a very prominent, modern barrier between the HAs at Hewell and has partially severed the connection between the HAs and their wider setting in this area. Although the development of Area 4 will harm this wider setting, due to the A448, the impact is not considered to be as great as the harm that would be caused to the setting of the HAs by the development of Area 5'.*

However the Inspector considered more explanation was required so therefore the report has been updated to assess in more detail the impact of development on Area 4 on the Hewell Heritage Assets, in addition to the impact of development on Area 5. The opportunity has also been taken to update the report in terms of the changes to relevant guidance documents since 2013.

In light of a number of legal decisions, the impact of any development on Area 5 on the Heritage Assets (HAs) at Hewell has been assessed as one of 'less than substantial harm' in terms of the NPPF. It is not considered that any mitigation measures could reduce the impact on the setting without also harming the setting of these heritage assets. In light of the harm being assessed as 'less than substantial', Paragraph 134 of the NPPF therefore has to be engaged. However it is highlighted that the conservation of Heritage Assets including their setting must be afforded great weight when weighing up the harm to the setting of the HAs against the public benefits, set out in this paragraph.

In terms of Area 4, although the Area forms part of the wider rural setting to the Hewell HAs, the A448 forms a prominent modern barrier between the Area and these HAs. Development in this Area will cause harm to the wider setting, but its impact on the Hewell HAs is reduced due to the separation of the Area from the HAs caused by this road. There is the potential for the impact to be greater on the Water Tower, which is seen from the Area and the Walled Garden, located south west of the A448. However restricting development in the north west corner of the site and reinforcing the existing tree and hedgerow to the north of the site, will minimise this impact. The level of harm would be 'less than substantial', but considerably lower on the scale than that caused by developing Area 5. Paragraph 134 would still need to be engaged.

#### Lanehouse Farm Setting of Heritage Assets Assessment

During the Examination the Inspector raised concerns about the impact of development on Area 4 on the nearby HAs at Hewell Grange. This prompted not only a revised assessment of the setting of HAs at Hewell in light of Area 4, but also an assessment of the setting of the Grade II listed Lanehouse Farm, which lies to the South west of Curr Lane, opposite the site. Like the Hewell Assessment this study followed the guidance in the Site Allocations in Local Plans document, produced by Historic England.

Area 4 forms part of the rural setting of Lanehouse Farm to the north east. Development of this area therefore has the potential to harm this setting. However this harm could be minimised by restricting development in certain areas, notably to the north east and east of Lanehouse Farm, and by reinforcing existing tree lines and hedgerow with native planting.

The level of harm would be less than substantial, so Paragraph 134 would still need to be engaged.

#### Updated Five Year Housing Land Supply Documents

In response to your Post-Hearings Note of 10<sup>th</sup> July 2015, both Councils are submitting an updated mid-year (31<sup>st</sup> October 2015) five year housing land supply calculation to the Examination. Your preferred methodology approach of applying the buffer to both the five year requirement and the current delivery shortfall has been adopted. For Bromsgrove it demonstrates that a five year land supply is achievable, with a figure of 5.55 years supply. For Redditch, it demonstrates that a five year land supply is also achievable, with a figure of 5.05 years supply.

#### Gypsy and Traveller Accommodation Assessment

The additional consultation required for Redditch Borough Council on the Worcestershire Gypsy and Traveller Accommodation Assessment (with reference to the Inspectors Note of 3<sup>rd</sup> October 2014, paragraphs 20 and 21) will also start on 31<sup>st</sup> December 2015. Any responses and the final assessment will be submitted to Redditch's Examination for this purpose.

## **16. CONCLUSION ON THE CHOICE OF THE SELECTED SITES FOR ALLOCATION AND REJECTION OF OTHER AREAS**

- 16.1 The Area selection process has involved the consideration of a very significant amount of evidence which has been examined in various ways for approximately the last decade. Early indications (WYG1 - 2007) suggested that the area to the northwest of the Town would be the most suitable location for new housing development for a variety of reasons. It was also concluded at an early stage that existing public open space in Redditch would not be used to accommodate new housing as it is an important and defining feature of the Town. The early WYG1 – 2007 Study also acknowledged the need to use ADR land, as land already removed from the Green Belt to accommodate future needs. These conclusions have been confirmed in subsequent work. But for the purpose of preparing the BORLP4, all areas have been considered as part of the Area selection and SA process. Sites originally excluded from that site selection process, because they were assumed to be unsuitable (public open space) or assumed to be appropriate (ADR land), have been included in the site selection and SA process at the request of the Local Plan Inspector. Land located in all directions around Redditch has now been subjected to consideration. The main processes have been described in the HGDS and the Addendum and this Narrative. There has even been consideration of large areas of protected public open space in the Town. This is not a case in which only a few alternatives have been considered.
- 16.2 The selection process has been staged. All Areas have been considered in general terms and then excluded from further detailed consideration through the Broad Area Assessment as explained in the HGDS and the HGDS Addendum. The best performing areas have then been examined in more detail in the Focussed Area Appraisals, as again explained in the HGDS and HGDS Addendum. The process has been supported by the SA process, which has sought to examine many different factors associated with sustainability, albeit this has to be at a basic level with a simple scoring system. SA is a useful tool to inform decision making, although the decision making process involves a more sophisticated analysis of planning judgment.
- 16.3 In relation to Area selection a number of assessment factors were:
- Land outside the Green Belt
  - Value as open space
  - Green infrastructure – landscape and topography, statutory environmental designations, habitats and protected species, trees and woodlands, public rights of way and agricultural land quality.
  - Accessibility to public transport, retail, schools, health employment and the Town Centre
  - Vitality and viability of the Town Centre
  - Flood risk
  - Infrastructure capacity
    - physical (highways water); and
    - social (schools, education and health)

- 16.4 As can be ascertained from Chapter 9 of this Narrative, certain factors have proved more significant in differentiating between the suitability of Areas in and around Redditch than others. Some factors, such as agricultural land quality or access to secondary schools, are similar for all Areas. But certain key factors have proved more important in the Area selection process, such as the use of land already removed from the Green Belt and proximity and accessibility to the Town Centre. The importance of these factors and their application to the decision making process involves the exercise of planning judgment.
- 16.5 Factors which weighed more heavily in the Area selection process were as follows:
- Sites already removed from the Green Belt to meet development needs
  - Purposes of including land in the Green Belt
  - The ability to identify a strong defensible Green Belt boundary
  - Accessibility to the Town Centre
  - Topography
  - Heritage impact
  - Ability to integrate with existing built form and communities in Redditch
  - Potential to provide improvements for existing communities
  - Ability of area to accommodate a sufficient level of growth sustainably
- 16.6 Factors which individually were not key to determining Area selection were as follows:
- Impact on public rights of way
  - Trees and woodlands
  - BMV agricultural land
  - Infrastructure capacity- water, transport and health
  - Accessibility to employment, schools and health services
  - Flood risk
  - Landscape sensitivity
  - Statutory environmental designations
  - Habitats and protected species
- 16.7 All of the factors above have been examined. There is not one factor which has determined Area selection but rather a number of factors which when considered cumulatively point to a preferable site or sites.
- 16.8 The HGDS explains in detail the process employed to assess each Area's performance against area assessment criteria. As the above narrative illustrates again no one Area stands out as being considerably better than another. All of the Areas have constraints and strengths as the SWOT analysis illustrates. The choice that had to be made therefore was which Area, or combination of Areas, could most sustainably deliver the required amount of development and associated infrastructure with the least negative impacts.
- 16.9 Combinations of Areas have been examined to try and identify the best options. With detailed consideration of a number of Areas in the Focussed Area Appraisal, it is unnecessary to examine all possible combinations. The best Areas have emerged through the selection process, with the four selected as allocations highlighted below.

Combinations of each have been examined through the SA process, together with combinations with other Areas which have not been selected (such as Areas 5, 8 and 11), as addressed in Chapter 9.

- 16.10 **Area 6:** In terms of the two major cross boundary sites selected, as the HGDS states, Area 6 (Site 2) has the potential to integrate well into the existing urban fabric of Redditch. It has the easiest access of all the Areas to Redditch Town Centre and the facilities offered there, including a range of retail services and the train/bus station providing access to the wider area. This enables an opportunity to improve upon walking and cycling provision and to reduce car reliance. Most of the Area has good access to education facilities and there is an opportunity to consolidate education provision and enable further integration of communities. It is well served by existing bus routes and has employment close by. The impact on the highway network is more likely to lead to an even distribution throughout the strategic and local road networks.
- 16.11 A strong defensible Green Belt boundary can be identified and there are no issues with coalescence within this Area. There are limited environmental constraints with no SSSIs or SWSs in this Area and the impact on trees and woodland would be minimal. Similarly there are no designated historic assets within this Area. There is an opportunity to enhance the Green Infrastructure network utilising the Redditch Corridor. Whilst the Area is affected by high landscape sensitivity it is considered that by avoidance of development on high slopes new housing can be contained within the topography.
- 16.12 This site is capable of delivering 600 dwellings using the Councils' yardstick calculation. The promoters of the site have confirmed this capability but have stated that the site could have potential capacity for 700 dwellings. The site also scored very well in the SA process.
- 16.13 **Area 4:** Whilst lying further from the Town Centre than Area 6 (and some other areas), Area 4 is still in close proximity to the land to the south and east of the Town. It also offers the opportunity to provide good public transport access by extending the already existing bus services. Area 4 is a large area which has the capacity to accommodate some 2,800 dwellings without having adverse impact on Hewell Grange Registered Park and Garden. Unlike Area 5, the land is located on the opposite side of the elevated A448 Bromsgrove Highway from the Registered Park and Garden. The Walled Garden is located on the south side of the road, but this is capable of being well protected by the very pronounced ridge/spur crossing the north western end of the Area, upon which there is to be no development. The promoters have confirmed that a figure of 2,800 new dwellings is still possible without developing on this ridge or in areas which will harm the setting of Lanehouse Farm. This issue has been examined in detail by the Bromsgrove Council's Conservation Officer.
- 16.14 Development on this scale brings with it the opportunity to provide new facilities for existing residents in the area. It thus has the capability of improving facilities and services in the wider Webheath area such as improving education choice, retail vitality and public transport provision. The Area's location means that it is able to connect well into the existing urban form of Redditch at Webheath.

- 16.15 Whilst it does not have overall strong defensible Green Belt boundaries on all sides, the effects of sprawl, coalescence and encroachment can be mitigated more successfully than some other Area options. Within the Area, a developable area can be formed which does have a strong defensible Green Belt boundary and which is visually very well contained. There are many opportunities within the Area to enhance the Green Infrastructure network utilising the wooded areas as environmental and landscape assets, including the Monarch's Way, the Swans Brook and other rights of way. Whilst some constraints to capacity have been identified on site, such as the Water Source Protection Zone and heritage issues, promoters have confirmed that the Councils' estimated capacity is still achievable within acceptable densities.
- 16.16 **Area 3:** In terms of the sites selected for development which lie within Redditch, part of Area 3 is an existing Area of Development Restraint (Webheath ADR). Its particular strength lies in the fact that it is not Green Belt land, where most land around Redditch is. It also has the benefit of detailed planning permission on a substantial part of the site. Not only is this land not in the Green Belt, but it is also land that was specifically excluded from the Green Belt to meet the future housing needs of the Town. This is hugely significant in terms of its suitability as a site for development. The Area also relates very well to the existing urban fabric of Redditch, being surrounded by existing development on three sides. There is good access to education provision and reasonably good access to Redditch Town Centre from a variety of routes. A strong defensible boundary is capable of being identified and there are no issues with coalescence with any other settlement. There are no environmental constraints as there are no SWS or SSSI within the Area boundary and no heritage issues have been identified which cannot be mitigated. There is an opportunity to improve the wider area in terms of public transport infrastructure and the viability of public transport. There is also the potential to improve the Green Infrastructure Network along its public rights of way.
- 16.17 **Area 18:** This Area is also an existing Area of Development Restraint (A435 ADR). It therefore benefits from not being designated as Green Belt land and its eastern side is already a well-established and defensible Green Belt boundary. It is considered suitable for development because it is capable of relating well to the existing urban form of Redditch. Its location also means it has good accessibility to existing schools and bus provision, which also has the potential of being enhanced. There is potential to enhance the walking and cycling routes in this Area. There is limited flood risk except in the far southern section of the Area. The Area benefits from having no environmental designations, with any environmental constraints being capable of being overcome. There is the potential to increase the vitality and viability of the nearby District Centres of Matchborough and Winyates.
- 16.18 **Area 5:** In relation to sites which were considered in the Focussed Area Appraisal but not selected, the heritage issues at Area 5, in terms of the identified harm to the setting of a Grade II\* Registered Historic Park and Garden and Conservation Area, were considered insurmountable. In the balancing exercise of harm versus public benefits [Hewell Grange Estate Setting of Heritage Assets Assessment December 2015] explains that the great weight to be attached to heritage assets outweighed the public benefits which in any case

could be realised elsewhere as other site choices were available. High points at the south-western and northern boundaries are visually prominent. More generally, the Area is not considered suitable for development (even smaller parts of the Area) because of the adverse impact on the rural nature of the setting of the Hewell Grange Conservation Area and the Registered Park and Gardens. Both the Conservation Area and Registered Park and Garden are very extensive and more importantly require a rural setting. If the urban area of Redditch extends closer to them they will be harmed. The position is very different for the land on the southern side of the (in parts) elevated and busy A448 (Area 4). There were also some environmental constraints within Area 5 with one SWS and one SSSI constraining development. There is also the threat of downstream flooding from Batchley Brook where there are numerous records of historic flooding. Area 5 is judged an inappropriate site largely on environmental grounds, most especially on grounds of heritage impact.

- 16.19 **Area 8:** Whilst benefits were identified in selecting Area 8, such as the possibility of providing the Bordesley Bypass, the distance to leisure facilities and recreation, its perceived proximity to the Town Centre, and other factors outweighed these. These include lack of connectivity with the Town, with the Arrow Valley Park segregating the Area from the remainder of the Town. This serves as a key Green Infrastructure linkage to the wider countryside. Consequentially development in this location would be isolated from the Town, as is already the case for the more modest development in this location. The Area would require very significant investment in walk and cycle infrastructure in order to provide the necessary level of accessibility to/from the Area. The route along the main road into the Town Centre is particularly unattractive, with inadequate footways, isolated sections with no overlooking, large scale roadside laybys and a forbidding major roundabout junction.
- 16.20 Area 8 also has a lack of opportunities to create a defensible Green Belt boundary. This creates a sense of uncontrolled and uncontained sprawl not evident in Areas 6 and 4, which are to a much greater degree contained by the local topography. This sense of sprawl would be a prominent feature in the landscape especially due to weak intermediate Green Belt boundaries to contain development. Development would also lead to a significant reduction in the Green Belt gap between Redditch and Alvechurch and the West Midlands conurbation. It is visually prominent when viewed from surrounding areas due to the topography and general openness of the Area. There are environmental constraints with a SWS running through the Area. The presence of a number of heritage assets and the flood risk areas combine to limit the site capacity. Development could also encourage commuting northwards, exerting pressure on the A441 and the A435. It is considered that development of Area 8 does not represent a natural extension of the Town and would create an unsustainable isolated community on its periphery.
- 16.21 **Area 11** is a very large and expansive Area well removed from the existing urban area. There is only a small area where a defensible Green Belt boundary can be identified. There are a number of issues that led to the conclusion that the Area was not suitable for residential development. There is difficulty in relating the Area to the existing urban form and communities of Redditch, especially because the Area is not physically capable of being developed in isolation. In the west of the Area, development would be prominent

and represent sprawl into the countryside. Development could lead to coalescence with small villages such as Tutnall, Bordesley and Tardebigge. Development would lead to a significant reduction in the Green Belt gap between Redditch and Alvechurch and the West Midlands conurbation. There is potential for harm to the natural environment with four SWS and ancient woodland on site. Access to public transport is particularly poor in the north and west parts of the Area. Development of the full Area wraps around the Hewell Grange Conservation Area and Historic Park and Garden on three sides, affecting the setting of the south and south-western aspects of the assets. There are listed buildings under threat in the northwest of the Area. Also the Worcester and Birmingham canal Conservation Area runs through a large part of the Area to the northwest. Area 11 is judged inappropriate for development for reasons of both physical isolation (similar to Area 8) and environmental factors (similar to Area 5).

- 16.22 The Councils consider that the above narrative clearly explains the justification for the choices made in terms of Area selection with reference to relevant evidence. This explanation is, of necessity, fairly lengthy in itself which further demonstrates the substantial amount of evidence that has been relied upon to arrive at these conclusions. This narrative therefore purely represents a summary of all evidence that has informed this decision and does not seek to replicate all of the analysis and conclusions which can be found elsewhere in the evidence base. It is considered that the evidence presented is proportionate and as such has been prepared within the spirit of the NPPF.
- 16.23 As a result of the above narrative and the further heritage evidence produced it is intended that policy RCBD1 in the BDP (appendix in the BORLP4) will be amended to further define the developable area boundaries in relation to Area 4.

## Appendices

- a. Redditch's position in Worcestershire
- b. the three LPAs involved (including Stratford District)
- c. the location of the ADR's
- d. the POSs and name Arrow Valley and Morton Stanley Park
- e. the 21 areas of search
- f. the quadrants in the WYG report
- g. the final cross boundary allocations
- h. chronology of Duty to Co-operate
- i. Timeline of Examination Process
- j. Bus timetables
- k. References
- l. SWOT analysis

**Appendix a- Redditch's position in Worcestershire**



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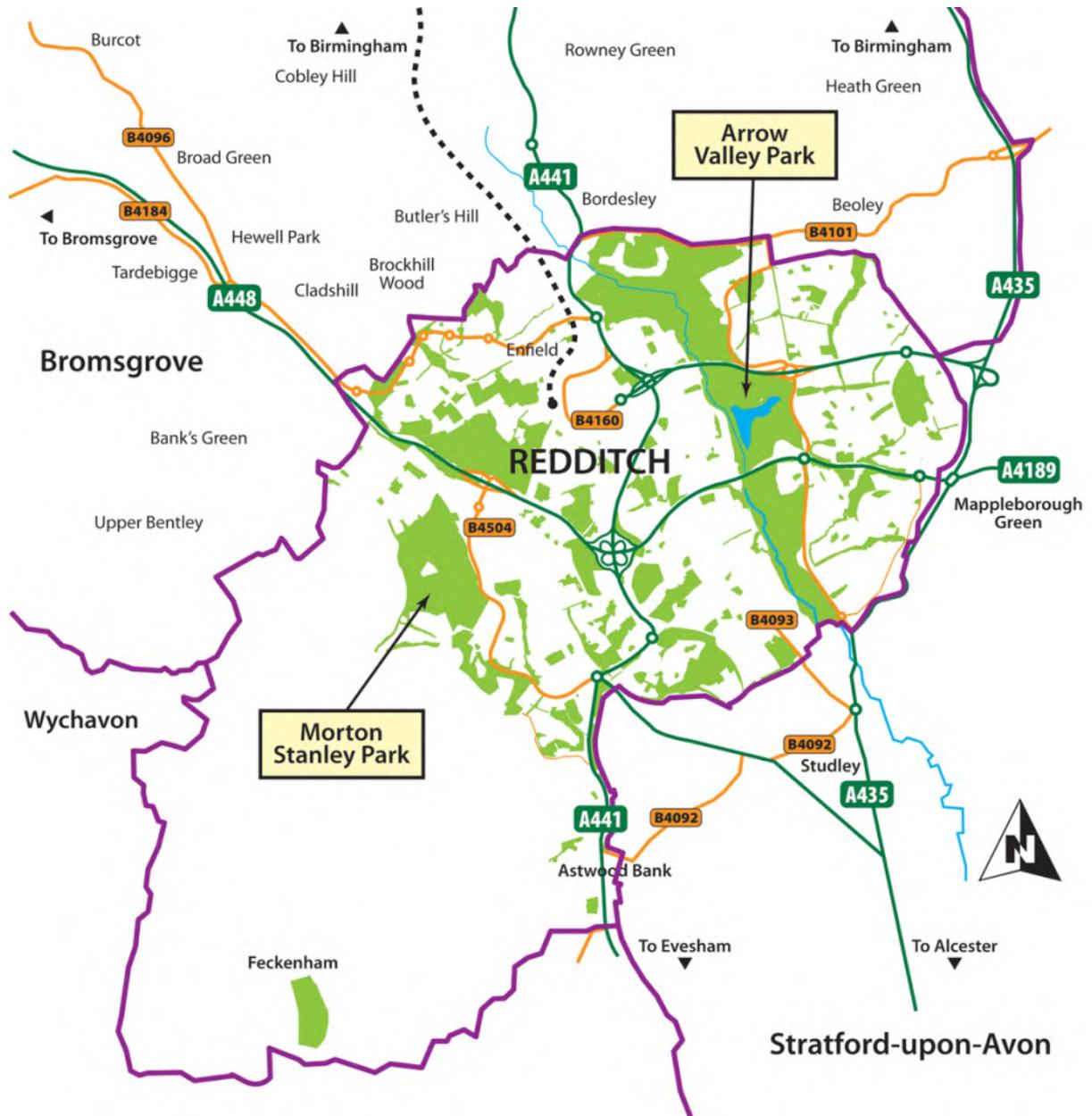
**Appendix b- the three LPAs involved (including Stratford District)**



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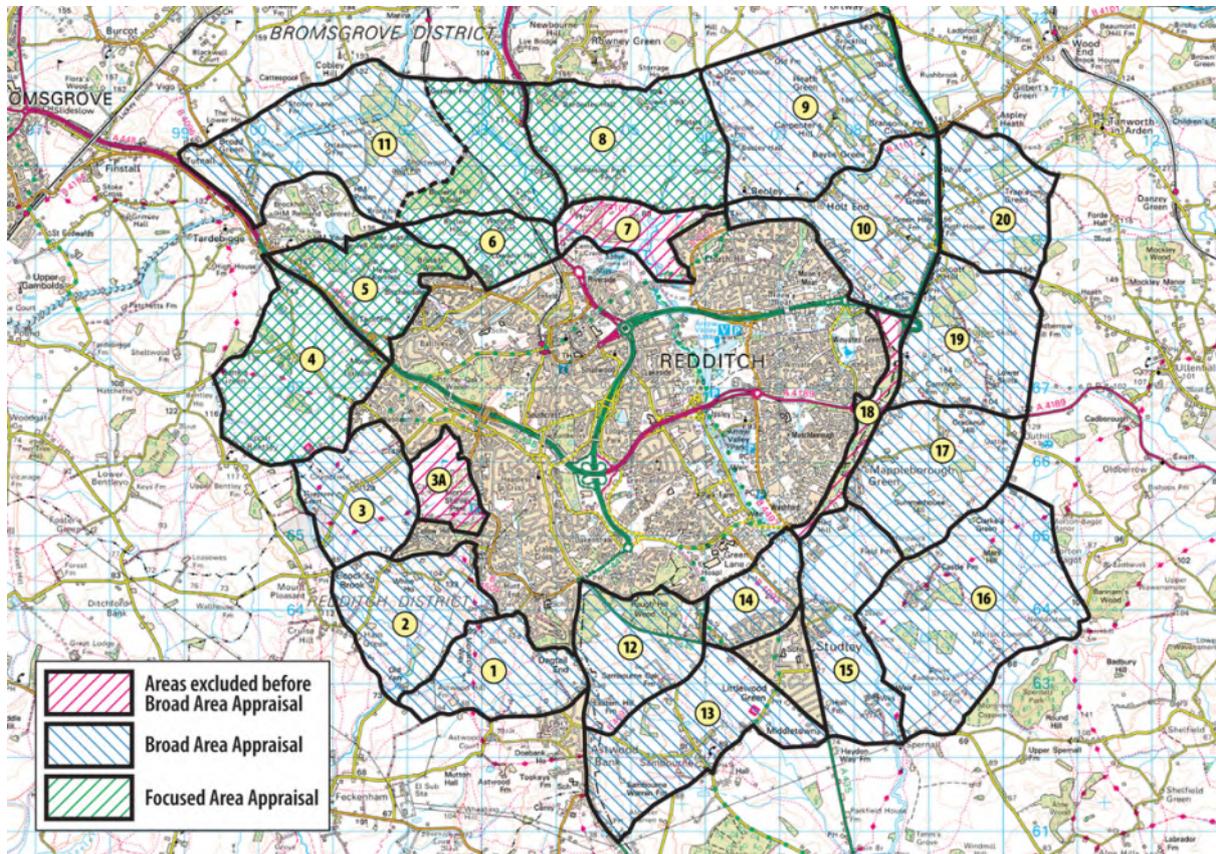


Appendix d- the POSs and name Arrow Valley and Morton Stanley Park



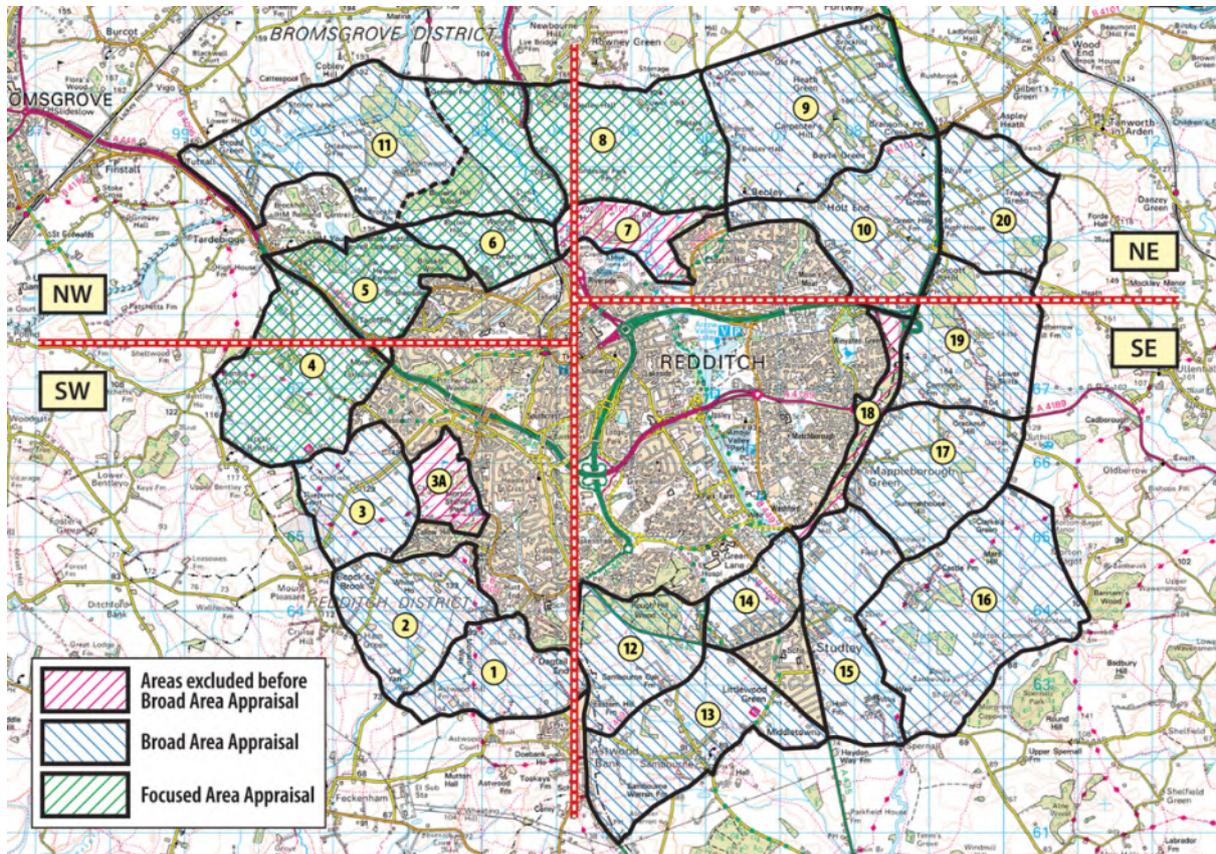
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Appendix e- the 21 areas of search



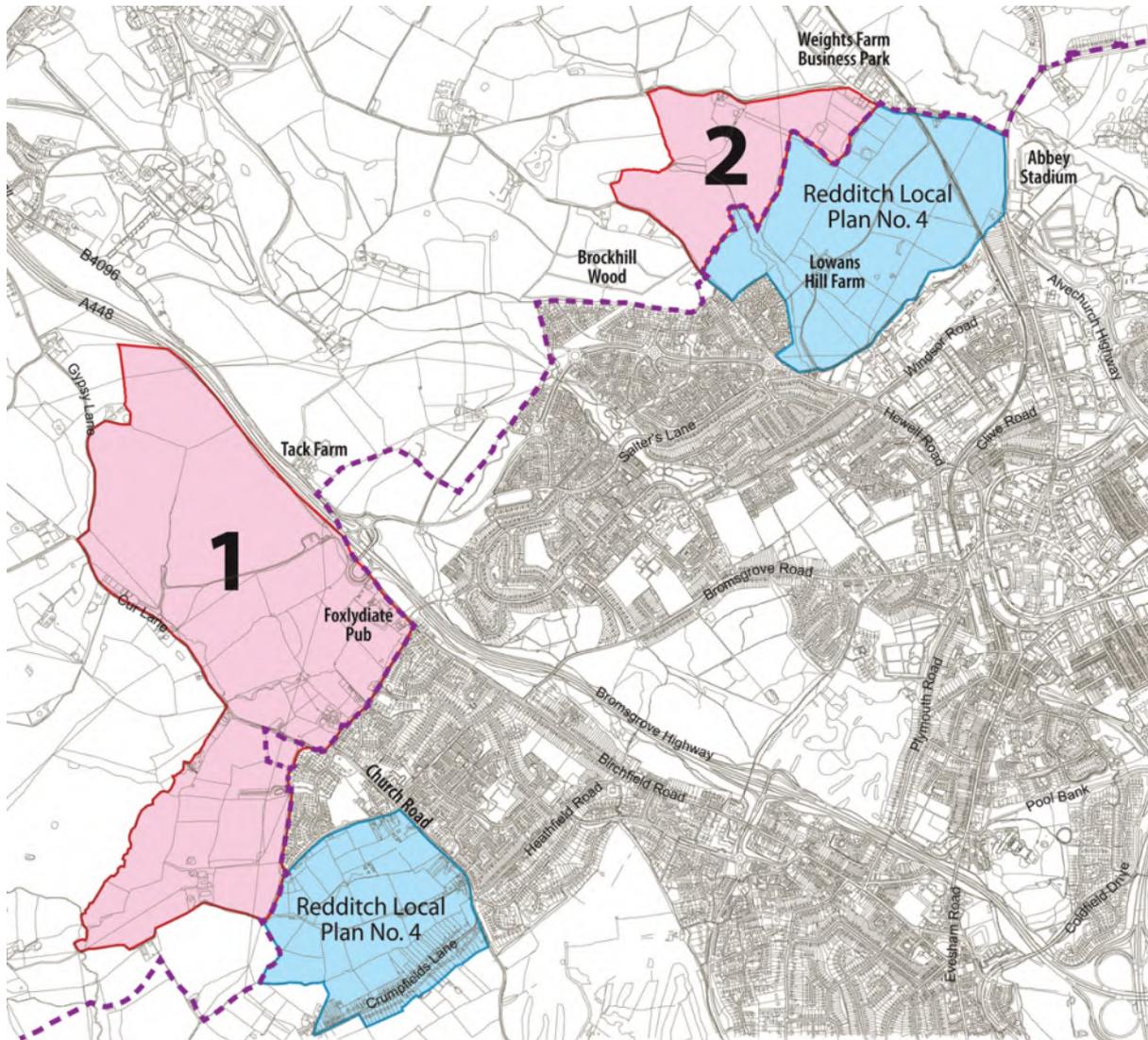
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Appendix f- the quadrants in the WYG report



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Appendix g- the final cross boundary allocations



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#### Appendix h- DTC Redditch & Bromsgrove timeline

Date	Mechanism	What happened?
14 November 2006	RBC response to WCC's response to the RPB's Section 4(4) Authorities brief	<ul style="list-style-type: none"> <li>Capacity of Redditch overestimated due to sites listed being completed already and some double-counting of existing commitments</li> <li>Raised prospect of Green Belt development to North/North West Redditch in Bromsgrove District</li> <li>First raised issues of development in SW Redditch Green Belt based on previous findings</li> <li>First raised issues of development in NW Redditch Green Belt based on previous findings</li> <li>Suggested more work on feasibility of options for growth</li> </ul>
4 January 2007	Letter to P Maitland (WCC) - Redditch Joint Study	<ul style="list-style-type: none"> <li>RBC having difficulty understanding implications of higher growth options</li> <li>Raised need for technical evidence about ability of the area to accommodate growth</li> <li>Evidence must explore potential of viable locations beyond Borough's boundaries in Worcestershire and Warwickshire</li> <li>Need to rule out or confirm the South West as a development option, an up-to-date survey needed</li> </ul>
2 March 2007	RBC - WMRSS Spatial Options responses (Council endorsed response)	<ul style="list-style-type: none"> <li>RBC stated Options 2 and 3 result in issues with allocating new sites to meet demands of the housing options</li> <li>Concern that without a Joint Study, WMRSS review process will not have information to determine whether RBC target meets WMRSS objectives and whether growth options are deliverable</li> <li>Could include the consideration of new settlement as an alternative to dwellings in Green Belt within Redditch Borough, Bromsgrove District and Stratford-upon-Avon</li> </ul>
5 March 2007	BDC - WMRSS Spatial Options responses (Officer response)	<ul style="list-style-type: none"> <li>BDC stated that there was limited justification for meeting Redditch's unmet need in Bromsgrove.</li> <li>Considered narrowing of strategic gap between Redditch and MUA damaging to function of Green Belt and unacceptable part of either option 2 or 3. BDC stated allocation in Bromsgrove to meet housing needs of Redditch will be strongly resisted</li> </ul>
22 February 2007	WCC - WMRSS Spatial Options responses	<ul style="list-style-type: none"> <li>WCC stated that to meet locally generated growth needs development would most likely have to be directed to the North West within Bromsgrove District. The only alternative would be to seek growth East to Warwickshire but this too has been ruled out in the past</li> </ul>
12 June 2007	Letter to R Poulter (WMRA) re. Redditch joint study (WYG1)	<ul style="list-style-type: none"> <li>Grateful for WCC lead and support from BDC but concerned about SOADC and Warks CC lack of contribution</li> <li>RPB should have taken a leading role in bringing all relevant parties to the discussion</li> </ul>
2 May 2008	Joint letter to Mark Middleton re. cross boundary working (from RBC, BDC and SOADC)	<ul style="list-style-type: none"> <li>Concerned about no local robust arrangements for splitting the target</li> <li>Concerned that second stage study may not be forthcoming</li> <li>GOWM not expressed a will for second stage study</li> <li>No political will from BDC and SOADC for commissioning second stage study</li> </ul>
September 2008	RBC response to BDC Town Centre	<ul style="list-style-type: none"> <li>RBC fully supported statement "centre to serve their local communities in terms of retail provision, access to services and cultural and leisure facilities. The role of Bromsgrove Town Centre is not to provide retailing facilities for those</li> </ul>

Date	Mechanism	What happened?
	AAP (Issues and Options)	<p>from other districts and nearby rural settlements” and AAP's recognition of the role of Bromsgrove Town Centre in line with Policy PA12B Non-Strategic Centres - West Midlands Regional Spatial Strategy Phase Two Review (Preferred Options)</p> <ul style="list-style-type: none"> <li>• RBC questioned appropriateness of wording when considering the role of Bromsgrove as set out in the WMRSS "expanded retailing so the town can compete with other shopping centres."</li> <li>• RBC considered it inappropriate to attract shopping from elsewhere other than to meet local needs of Bromsgrove</li> <li>• The response was considered alongside all other responses at the issues and options stage and fed into further iterations of the AAP, no further comments were received from RBC on subsequent versions and therefore the issues are considered resolved.</li> </ul>
9 December 2008	RBC - WMRSS Preferred Option responses	<ul style="list-style-type: none"> <li>• Elements of BDC and RBC response agreed and sent jointly. Namely: Climate change, Creating Sustainable Communities, Emphasis on development on brownfield land, Sustainable design and construction, Spatial Strategy Objectives, Planning in Partnership, The Sub-Regional implications of the Strategy (Worcestershire), Communities for the future, Improving air quality for sensitive ecosystems, The Spatial Strategy, Housing within the MUAs, Level and distribution of new housing development, Quality of the environment – Waste policies, Transport and accessibility</li> <li>• BDC and RBC objected to Redditch SSD (Settlement of Significant Development) designation</li> <li>• BDC, RBC and SOADC asks for the Redditch growth level to be split between authorities</li> </ul>
8 December 2008	BDC - WMRSS Preferred Option responses	<ul style="list-style-type: none"> <li>• BDC objected to Redditch growth level accommodated adjacent to Redditch citing alternative more strategically viable sites within the District</li> <li>• BDC and RBC objected to Redditch SSD designation</li> <li>• BDC, RBC and SOADC asks for the Redditch growth level to be split between authorities</li> <li>• Elements of BDC and RBC response agreed and sent jointly</li> </ul>
3 December 2008	SOADC - WMRSS Preferred Option responses	<ul style="list-style-type: none"> <li>• SOADC stated that evidence suggests that its necessary for Bromsgrove and/or Stratford-on-Avon Districts to take more than the 3,300 dwellings initially stated in the emerging WMRSS Revision</li> <li>• BDC, RBC and SOADC asks for the Redditch growth level to be split between authorities</li> <li>• The findings of the study (WYG2) should be incorporated into the final version of the WMRSS. This would enable the WMRSS to specify that none of the Redditch housing requirement would be accommodated in Stratford-on-Avon District</li> </ul>
Cabinet Report 5 March 2008	WCC – WMRSS Preferred Option responses	<ul style="list-style-type: none"> <li>• Without acceptable further explanation, WCC cannot support the policy amendment in relation to Redditch's designation as an SSD</li> </ul>
8 December 2008	GOWM - WMRSS Preferred Option responses	<ul style="list-style-type: none"> <li>• GOWM stated it would be helpful if WMRSS could be more specific in relation to Redditch allocations in neighbouring Districts</li> <li>• Suggested questions that the Panel might consider included: <i>“Does the draft RSS provide sufficient clarity to local authorities in preparing LDFs about the allocation of housing where there are cross border allocations, such as around Redditch?”</i></li> </ul>

Date	Mechanism	What happened?
9 December 2008	RBC response to Nathaniel Lichfield & Partners (NLP) Report	<ul style="list-style-type: none"> <li>• RBC objected to NLP Report proposing additional growth towards Redditch in Bromsgrove District due to its SSD designation</li> </ul>
April 2009	WMRSS Examination	<ul style="list-style-type: none"> <li>• RBC, BDC and SOADC continuing to request a split target for both housing and employment</li> <li>• RBC, WCC and BDC objected to SSD designation</li> <li>• WCC suggest Redditch growth restricted to natural growth</li> <li>• RBC supported principle of accommodating natural growth but concerned that accommodating PO level of development undermines urban renaissance</li> <li>• RBC objected to NLP Report proposed increases to Bromsgrove and suggestion to direct towards Redditch</li> <li>• RBC submitted that studies (listed) provide up to date evidence</li> <li>• RBC and BDC suggested housing numbers a matter for panel but locations a matter for CS</li> <li>• BDC objected to level of Redditch growth within Bromsgrove and/or Stratford; re implications for Bromsgrove green belt</li> <li>• BDC now commented that housing 'overspill' can only abut Redditch border and not be allocated to more appropriate sites in Bromsgrove</li> </ul>
September 2009	WMRSS Phase 2 Panel Report	<ul style="list-style-type: none"> <li>• Inspectors conceded that these Authorities needed a steer</li> <li>• Recommended 7000 dwellings for Redditch's needs, this is rounded up</li> <li>• Around 3000 of the 7000 dwellings to be located adjacent to Redditch in Bromsgrove District (Panel Report p.88, Recommendation R3.1). Paragraph 8.84 p.194 states <i>"We agree, however, with Bromsgrove Council that the choice of locality around the boundary of Redditch should be locally determined whether at or adjacent to the Webheath/Foxlydiate or Brockhill ADRs or in the Bordesley Park area or in some combination of these possibilities or elsewhere"</i>.</li> <li>• Provision in Redditch should be at least 4,000 dwellings</li> <li>• The balance of employment to be located adjacent to Redditch in Bromsgrove District</li> <li>• Universally recognised Redditch has limited capacity</li> <li>• Provision in Redditch purely to meet local needs, not wider regional needs</li> <li>• Recommended removal of Redditch as SSD</li> <li>• Given constraints and overlapped travel to work area with MUA larger housing allocations not appropriate at Redditch</li> <li>• Green Belt review explicitly required to facilitate the development at Redditch in BD or SOAD</li> <li>• Disposition recognised to have not been resolved by the Councils. WYG Report intended to resolve issue, but did not</li> <li>• Near to Alvechurch, parts of Bordesley Park in clear view, some ADR and adjacent land appear well contained in landscape terms</li> <li>• No good reason to reverse October 2008 Study (WYG1) conclusions identifying parts or all of ADRs</li> <li>• Would have favoured development between Redditch and Studley on landscape and character grounds alone</li> <li>• Difficult to develop towards Studley or eastern Redditch fringe unless funded proposals solve traffic problems</li> </ul>

Date	Mechanism	What happened?
		<ul style="list-style-type: none"> <li>• Choice of locality around Redditch boundary to be locally determined</li> <li>• Important for closely aligned timetables and coordinated Examination</li> </ul>
8 February 2010	Joint PINS Briefing	<ul style="list-style-type: none"> <li>• Purpose was to consider what had been done so far in preparation of the two Plans and identify matters which may be problematic in terms of soundness</li> <li>• Cross boundary issues appear to present the greatest obstacle to the Plans' progress</li> <li>• Joint growth options for Redditch consultation is a promising start to joint working</li> <li>• There is still a lot of evidence-based work to undertake to inform the decision-making process</li> <li>• There appears to be some doubt as to which Plan is 'responsible' for cross-boundary strategic sites – PINS view is that both Plans have responsibility</li> <li>• Information should be collected and assessed on a joint basis and should be in place before either Plan is submitted</li> <li>• The matter of deliverability goes to the heart of both Plans and is a matter that should be jointly addressed</li> <li>• The issue of demonstrating the most sustainable and deliverable sites needs to be dealt with in both Plans, or their evidence bases, and the only sensible way to do so is through joint working</li> <li>• The Councils have set up a Joint Planning Board and a Joint Planning Advisory Panel which will provide the mechanism through which cross boundary issues can be aired</li> <li>• PINS welcomes the WMRSS Panels comments regarding the close alignment of Examination timetables</li> <li>• Options for 'swapping' employment/ housing allocations on SOAD/ BD land need to be explored jointly</li> <li>• Views of WMRA would need to be sought on the question of the effect these options would have on the general conformity of the Plans with the WMRSS</li> <li>• At any such Examination, it is critical that the two Councils are in a position to present a united front and produce robust evidence in support of their joint proposals</li> <li>• Any housing that is being provided specifically to meet RBs needs should go towards RBCs 5 year land supply</li> <li>• The same principle applies to employment land</li> <li>• If there is evidence which indicates a difference in house types to meet BDC or RBC needs, there is no inconsistency in the BDC Plan containing separate policies to deal with these requirements</li> <li>• Capacity may be less than the Panel Report estimates. It should be possible to identify sufficient land to build in an element of flexibility</li> <li>• Cross boundary development will involve removing land from the Green Belt. Proposals affecting the GB should relate to a timescale beyond the Plan period. If this is not the case, clear reasons need to be given</li> <li>• Dealing with infrastructure costs, CIL etc jointly would benefit from BDCs previous experience when dealing with matters such as the Longbridge AAP</li> </ul>
8 February to 30 April 2010	Joint development options consultation for Redditch expansion	<ul style="list-style-type: none"> <li>• Consultation for development targets for RB as recommended by the WMRSS Phase 2 Panel Report and options for accommodating the required development in BD</li> </ul>
6 July 2010	DCLG letter from	<ul style="list-style-type: none"> <li>• Revocation of RSSs announced with immediate effect</li> </ul>

Date	Mechanism	What happened?
	Chief Planner announcing revocation of RSSs	<ul style="list-style-type: none"> <li>• Q&amp;A attachment stressed that local authorities would be responsible for establishing the right level of local housing provision without the burden of regional targets</li> <li>• Q&amp;A attachment also stressed the importance of transparent justification for the housing numbers that should be based upon reliable information and defended at Examination</li> <li>• Subsequent issues arose following this announcement relating to the legality of the process and the need for SEAs to be undertaken before revocation could take place</li> <li>• After the change of Government and RSS revocation announcement: <ul style="list-style-type: none"> <li>- BDC reverted to its pre RSS stance in resisting the large scale GB releases to meet RBC needs</li> <li>- RBC adopted a capacity-led approach and communicated a lack of political appetite for growth despite the evidence</li> </ul> </li> <li>• Joint working halted in late 2011</li> </ul>
21 January to 31 March 2011	Revised Preferred Draft Core Strategy consultation	<ul style="list-style-type: none"> <li>• Consultation for 3200 dwellings (2006 to 2026). This target was based on the currently identified deliverable sites within Redditch</li> <li>• RPDCS stated that <i>“later in 2011, following more detailed evidence being collected and once some further clarity on the correct mechanisms for dealing with the Redditch growth issue is established, the Borough Council will be in a position to consult on all issues, both cross boundary and internal growth.”</i></li> </ul>
21 January to 15 April 2011	RBC officer response to BDC Draft CS2	<ul style="list-style-type: none"> <li>• Highlights that Plan fails to address cross boundary issues</li> <li>• Offers to work collaboratively with BDC to research any new or emerging guidance on determining a locally derived housing requirement, other development requirements and to develop shared approaches which are consistent and which should be considered sound at Examination</li> </ul>
March 2011	County-wide SHMA commissioned  (Published February 2012)	<ul style="list-style-type: none"> <li>• All six Worcestershire Authorities jointly commissioned the preparation of a SHMA to evaluate existing housing stock, analyse the future housing market and project the needs of future households which might occur under different scenarios</li> <li>• The SHMA included separate Overview Reports for each Local Authority, which focussed on key areas and presented a more detailed individual authority narrative</li> <li>• RBC supplemented the SHMA Report with a further Annex (May 2012) to identify a specific housing requirement for Redditch</li> </ul>
15 November 2011	Localism Act comes into force	<ul style="list-style-type: none"> <li>• Insertion into the P&amp;CP Act 2004 of <i>“Duty to co-operate in relation to planning of sustainable development”</i></li> <li>• LPAs must co-operate to maximise the effectiveness of development plan preparation</li> <li>• The duty imposed requires constructive, active and on-going engagement</li> </ul>
27 March 2012	Publication of the NPPF	<ul style="list-style-type: none"> <li>• <i>“Planning strategically across local boundaries”</i> – paras 178-181 set out guidance for effective co-operation</li> </ul>
27 April 2012	PINS briefing with Joint Management Team, RBC and BDC Members	<ul style="list-style-type: none"> <li>• PINS advice at this meeting was interpretation of the intention of how the new planning system will work</li> <li>• Recognition that the situation had become more complicated without the regional tier</li> <li>• Emphasis on Duty to Cooperate</li> <li>• It would be a problem if the LA did not seek cooperation. This is a legal issue and there is nothing PINS can do about</li> </ul>

Date	Mechanism	What happened?
		<p>it</p> <ul style="list-style-type: none"> <li>• PINS considered that the Councils could demonstrate the Duty to Cooperate based upon what had already been done jointly</li> <li>• If there is a need to cooperate, can cooperation be demonstrated and is the outcome effective?</li> <li>• 5 years land supply would need to be demonstrated in the Plan and questioned whether the authorities were 'persistent under deliverers'. LAs would need to take into account peaks and troughs in the property market potentially over a 6-10 year period. If a 5 year supply of land cannot be demonstrated then LAs vulnerable at appeal</li> <li>• A robust housing figure would be needed which was capable of withstanding challenges made at the Examination</li> <li>• Highlighted the tension between the notion of localism and the presumption in favour of sustainable development</li> <li>• Government priority is the delivery of houses and local views cannot 'trump' a national policy</li> <li>• PINS accepted the principle that the two plans could be brought forward in parallel but neither authority would be able to progress significantly ahead of the other</li> </ul>
3 May 2012		<ul style="list-style-type: none"> <li>• As a result of the local elections in May 2012 there was a change of political control to Labour at RBC</li> </ul>
5 July 2012	RBC Leader Duty to Cooperate letter to BDC Leader	<ul style="list-style-type: none"> <li>• Intention of letter is to establish the first formal agreement of joint working under the new Duty to Cooperate</li> <li>• States LPA responsibilities under Localism Act</li> <li>• States relevant NPPF Guidance</li> <li>• States that PAS has suggested various forms of evidence to demonstrate compliance with the Duty to Cooperate</li> <li>• Outlines RBC issues of limited development capacity and the possibility of accommodating development to the north/north west of Redditch in BD, preferably contiguous to the boundary</li> <li>• Stresses the importance of addressing the Duty to Cooperate issues as soon as possible in the plan making process</li> <li>• States that PINS is unable to assist LPAs in resolving Duty to Cooperate problems and that all issues must be resolved before plans are submitted for Examination</li> </ul>
3 August 2012	BDC Leader's response to RBC Leader's Duty to Cooperate letter	<ul style="list-style-type: none"> <li>• Acknowledges BDCs responsibility under Duty to Cooperate and that BDC will be happy to formally open discussions with RBC</li> <li>• Acknowledges the issue of BD accommodating Redditch growth needs has challenged both LPAs for a number of years without resolution</li> <li>• RBC request for joint working is a step closer to securing some certainty on this issue which will allow both LPAs to prepare and adopt sound development plans</li> <li>• BDC officers have been instructed to continue working with RBC officers in an attempt to find a mutually acceptable solution to the issue</li> </ul>
6 December 2012	Joint Member Briefing	<ul style="list-style-type: none"> <li>• Member briefing in Bromsgrove for Members from both Councils to present the findings of the Green Belt Review and the identification of locations for cross boundary growth</li> </ul>
18 February 2013	Redditch Full Council	<ul style="list-style-type: none"> <li>• RBC Members voted not to endorse consultation material on cross boundary growth and hence not proceed with planned joint consultation on this issue nor with emerging Local Plan No 4</li> </ul>
21 February 2013	BDC Leaders Duty to Cooperate letter	<ul style="list-style-type: none"> <li>• Reminds RBC of Duty to Cooperate</li> <li>• Asks RBC to reconsider Executive decision</li> </ul>

Date	Mechanism	What happened?
	to RBC Leader	<ul style="list-style-type: none"> <li>States that BDC resolved to go out to consultation on issue but would delay start of consultation to give RBC time to reconsider</li> </ul>
25 March 2013	Redditch Full Council	<ul style="list-style-type: none"> <li>Members reconsidered the decision taken on 18 February and voted to endorse the consultation material on cross boundary growth and emerging Local Plan No.4</li> </ul>
1 April to 15 May 2013	Joint Housing Growth consultation	<ul style="list-style-type: none"> <li>Joint consultation for two cross boundary development locations in BD, contiguous to RB. Site 1 – Foxlydiate (2400 dwgs) and Site 2 – Brockhill East (600 dwgs)</li> </ul>
23 April 2013	DCLG letter from Chief Planner announcing formal revocation of the WMRSS	<ul style="list-style-type: none"> <li>Letter informs that the Order to revoke the WMRSS had been laid before Parliament and the Order would come into force on 20 May 2013</li> </ul>
30 September - 11 November 2013	Publication of Bromsgrove District Plan 2011-2030 and Redditch Local Plan No 4 (Proposed Submission version)	<ul style="list-style-type: none"> <li>Aligned publication of both Plans at Proposed Submission stage and aligned period for representations with a view to eventual aligned date for Submission stage and Examinations in Public.</li> </ul>
30 September 2013	Publication of IDPs	<ul style="list-style-type: none"> <li>IDP evidence to support delivery of both Plans involved joint working and consultation with infrastructure providers to produce individual IDPs with identical joint transport sections</li> </ul>
10 December 2014	CLG briefing with Joint Management Team, RBC and BDC Officers	<ul style="list-style-type: none"> <li>CLG advice at this meeting regarding next steps if there was a rise in housing / employment numbers as a result of the Worcestershire SHMA refresh and GBSLEP Study</li> <li>CLG advised that it would be logical for RBC and BDC to join up with the South Worcestershire Councils in providing an updated Objective Assessment of Housing Need for Worcestershire and to wait until this work was concluded before progressing to submission.</li> <li>The outcomes of the GBSLEP study can be dealt with at later stages of the plan period and there is no need to include capacity for Birmingham's needs in the current plans until the need within the LPA's areas are clearly established</li> </ul>
December 2013	County-wide SHMA Re-refresh commissioned	<ul style="list-style-type: none"> <li>The Worcestershire SHMA (2012) was submitted as part of the evidence base with the South Worcestershire Development Plan Submission Document. Following the Initial Hearing sessions the Inspector published his Interim Conclusions which outlined how the SHMA should be revised to help provide an updated Objective Assessment of Housing Need (OAHN)</li> <li>All six Worcestershire Authorities jointly commissioned the preparation of a SHMA refresh.</li> <li>The work commissioned recognises that demographic and jobs change circumstances in the South and North of the</li> </ul>

Date	Mechanism	What happened?
		<p>County of Worcestershire vary. The SHMA refresh therefore has in-built flexibility in both original and the updated studies to enable different scenarios to be applied on a sub-regional basis whilst employing the same core data and methodologies including sensitivity scenarios.</p> <ul style="list-style-type: none"> <li>• SMHA Re-fresh accepts that there is a degree of overlap in North Worcestershire and specifically Bromsgrove and Redditch districts with the Birmingham metropolitan area housing market area.</li> <li>• BDC and RBC will supplement the SHMA Re-fresh to develop further the migration scenarios to consider the implications for housing need arising from internal migration within the Birmingham metropolitan housing market area (which includes Redditch and Bromsgrove Districts) and from potential unmet housing need arising from Birmingham.</li> </ul>

## Appendix i

### Timeline of Examination in Public process

Key date	Key action	Implications	Comments
12 March 2014	BDP and BORLP4 submitted to Planning Inspectorate		
26 March 2014	Inspector writes to both LPA's warning of potential soundness concern and requesting that the OAHN is explicitly stated in both plans following discussion of the SHMA at the SWDP EIP	Edge Analytics commissioned by both LPAs to carry out additional scenario testing.  North Worcestershire Housing Need (April 2014) produced.  Document reference CD14.1 (BDC) and CDR17.1 (RBC).  8 April 2014 Councils respond to Inspector	No changes to the Plans are proposed as a result of the work
10 April 2014	Inspector responds that 2 hearing dates will take place on 16/17 June to cover the OAHN and Duty to Co-operate and also identifies further concerns in relation to Transport evidence; gypsies and travellers; flood risk and groundwater supply and housing land supply.	1 May 2014  Councils respond to Inspector to explain how the authorities intend to deal with each of the 4 topic areas identified	
16/17 June 2014	BDC/RBC joint hearing sessions		
7 July 2014	Inspector requested BDC to provide clarity on 1) how the three employment forecasting methodologies have addressed the matter of commuting. 2) How this has been reflected in the three employment forecasts? 3) It is not clear which of the three sets of projections have been taken forward to generate the employment land requirement  4) the relationship between the labour market evidence		

	presented in the ELR and that set out in the NWHN report and whether these two documents present a consistent picture?		
14 July 2014	BDC responded to Inspectors questions above	<p>1.The methodologies used were forwarded to PO.</p> <p>2.AMION consulting confirmed that there were differences in how the three employment forecasting models address the matter of commuting</p> <p>3. Additional information in table form was provided to the Inspector from WM Enterprises</p> <p>4.. WM Enterprises provided further details to clarify 4. WM Enterprises confirmed that there is a fairly strong and consistent relationship between the labour market evidence presented in the ELR and that set out within the NWHN Report</p>	
18 July 2014	Inspectors Interim Conclusions issued	<p>Inspector confirms that both authorities have met the DTC. Further work is required in relation to Bromsgrove's OAHN taking into account projected future employment growth and commuting levels. Inspector accepts principle of Green Belt Review to meet all of Bromsgrove's growth needs over Plan Period.</p> <p>OAHN set for Redditch at 6300 and Redditch to proceed to hearing sessions in September</p>	

		2014.	
4 September 2014	Inspector requests BDC to categorically state what its OAHN is	BDC responds on 25 September stating that it considers the objectively assessed housing need figure to be 6648 dwellings. This is generated from the averaged figures from sensitivity scenarios 3a and 3c (5,540 dwellings) with market signals providing an additional 20% uplift (6,648 dwellings) referring to work carried out by AMION and BDC (ED13 and ED14) submitted on 1 <sup>st</sup> September.	
23, 24,25 September 2014	BORLP4 hearing sessions		
3 October 2014	Inspector's Note issued which raised concerns regarding the site selection process for the cross boundary sites as 2 sites within Redditch Borough were excluded from the analysis. Also recommended that the BORLP4 Sustainability Appraisal is revisited.	7 October RBC reply to Inspector agreeing to submit further work before December hearings	
6 November 2014	RBC submit additional work on HGDS Addendum and accompanying SA and BORLP4 SA Refresh		
2- 4 December 2014	BDP Examination Hearing sessions	Inspector requested further work is carried out:  1) Further monitoring to be carried out by end of December and an updated position on the 5 YHLS to be produced and consulted on for 2 weeks and reported back to Inspector by 26 January 2015	1) Updated 5 Year Housing Land Supply published on website 6/1/15  2) Information on GTAA consultation sent

		<p>2) GTAA Council to write to consultees who made reps and ask for comments on updated GTAA allowing 2 weeks for responses (until 5/1/15) and the results to be reported back to Inspector</p> <p>3) The retail floorspace proposed minor amendment to increase provision by 16, 283m2 to be consulted on with all adjoining LPA's and responses to be collated by BDC and sent to Inspector.</p>	<p>to Inspector January 2015</p> <p>3) Responses on retail provision from neighbouring authorities published on website 29/1/15</p>
5 December 2014	Hearing Statements submitted for cross boundary hearing sessions	RBC requested short delay to Hearings on cross boundary to enable them to understand significance of other hearing statements and in absence of key member of staff	
11 December 2015	Original date planned for cross boundary hearings (subsequently revised to 20 January)		
12 December 2014	AMEC appointed by RBC to assess the credibility of External Hearing Statements (objections) and as a result of this to reconfigure the Redditch SA and related cross boundary SA work to address criticisms raised in hearing statements.		
17 December	RBC requests a second longer period of time to undertake further SA work. BDC decide to address objections made to their SA work and appoint AMEC to verify the amended SA, which is carried out internally by Officers.		BDC not asked by Inspector to do additional work but do so to ensure consistency is maintained

19 January 2015	Timetable for further SA work confirmed by Councils		
20/22 January 2015	Revised date for cross boundary Hearing sessions (subsequently revised to 23/24 June 2015)		
26 <sup>th</sup> January 2015	Counsel appointment to advise on legal aspects of the revised SA work		
16 March 2015	The Inspector invites comments of the Councils, and any other party, on the implications of the updated figures released on 27 February 2015 the 2012-based household projections for England 2012-2037 were released in respect of the ongoing examinations of the Bromsgrove District Plan and the Borough of Redditch Local Plan no. 4. Comments to be sent to the Programme Officer for receipt by 30 April 2015.	The Councils commission Edge Analytics to carry out further work to examine the implications of updated projection figures. This work shows that there could potential be an increase in the no of new dwellings required but the figures are open to interpretation and others (private sector) interpret these as a decrease. The Councils respond to the Inspector that no change to the Plans are proposed as a result of the examination of these statistics and this is submitted to Inspector on 30 April 2015	
24 March – 5 May 2015	Consultation on revised SA's		
18 May 2015	Updated SA's to take into account the responses received to the March version of the SA's and responses to the consultation submitted to the Examination		
17 June 2015	Inspector requests Overview Statement to be published on website by 19 June 2015		
19 June 2015	Councils publish overview statement detailing: 1) the sequence of actions undertaken by both authorities since 6 October 2014, 2) The outcome of process, 3) highlighting which documents the Council is relying on and 4) the relationship between each other of the	Published on website 19/6/15	

	documents produced		
23/24 June 2015	EiP Cross boundary Hearing sessions		
10 July 2015	Inspector's Post Hearing Note	<p>Further work required to clarify site selection including evidence and SA. Updated position on</p> <ol style="list-style-type: none"> <li>1) 5 YHLS</li> <li>2) Gypsy and Travellers</li> <li>3) Housing Standards</li> <li>4) Renewable Energy required.</li> </ol> <p>Inspector asks what authorities intend to do, either withdraw or do extra work and confirm intentions by 16/7/15</p>	
16 July 2015	Joint response to Inspector setting out that authorities do not wish to withdraw and will draw up a programme of additional work required with timescales by September when Inspector returns.		
15 September 2015	The Councils submitted to the Inspector the first proposed timetable and work programme		
21 September 2015	Inspector responded requesting that less extensive work was required and a shorter timescale to complete the work		
22 October 2015	The Councils respond with a revised proposal, outlining the intention to submit further work to the Inspector by 30 <sup>th</sup> December 2015		

2 <sup>nd</sup> November 2015	Inspector accepted the Councils' stated timescale for the submission of additional work by 30 December 2015		
26 November 2015	The Inspector requests that it be publicised on the websites that the 23 and 24 March 2016 have been identified as the date(s) for the further hearings. The Inspector asks that all parties note that the hearing(s) will be the opportunity to discuss the additional information, due to be submitted by the Councils on 30 December and that there will be no discussion on matters which have already been discussed at previous hearing sessions.		

## Appendix j.

### Bus Timetables

Bus provision to Redditch Town Centre<sup>10</sup>

In order to ensure that this narrative reflects an accurate and meaningful portrayal of the bus services associated with the Focussed Appraisal Areas, the most up to date bus provision information has been presented in the table below for comparison purposes (grey rows relate to services no longer available, which were cited in the HGDS and green rows relate to additional services which could be accessed from other nearby bus stops with some additional walking). For the purposes of the HGDS and this analysis, a reasonable walking distance to public transport has been taken as less than 800m.

Service No.	Route	Bus Stop	Frequency
<b>Area 3</b>			
55/56			From Sept 2014: Reduced service, which no longer serves Webheath
47 (Inbound) 48 (Outbound)	Redditch Circular (Inbound)	Tynsall Ave	Mon to Sat - every 30 mins, Sun - every hour New service from Sept 2015, which replaces the 55/56 service for this Area in terms of frequency and analysis
143 (Inbound)	Bromsgrove to Redditch	opp. Tynsall Ave	Mon to Sat - every hour, No Sunday service
X3 (Inbound)	Kidderminster via Bromsgrove to Redditch	opp. Tynsall Ave	Mon to Sat - every hour, Sun - 3 journeys

At first glance, it appears that Area 3 is only served at best by a half-hourly bus service, which for peak-time travel could not be considered an effective or efficient service. However, the scheduled arrival times at the Tynsall Road bus stops across these three services, equates to a bus at approximately 15 minute intervals, making the Town Centre and the transport interchange readily accessible.

A financial contribution of over £59,000 has been secured to improve public transport provision in Webheath as part of the recent planning consent for 200 dwellings on the Webheath ADR.

<sup>10</sup> Source: [http://www.travelinemidlands.co.uk/wmtis/XSLT\\_SELTT\\_REQUEST?language=en](http://www.travelinemidlands.co.uk/wmtis/XSLT_SELTT_REQUEST?language=en)

Service No.	Route	Bus Stop	Frequency
<b>Area 4</b>			
X3 (Inbound)	Kidderminster via Bromsgrove to Redditch	opp. Foxlydiate PH	Mon to Sat - every hour, Sun - 3 journeys
143 (Inbound)	Bromsgrove to Redditch	opp. Foxlydiate PH	Mon to Sat - every hour, No Sunday service
142			Service discontinued
47 (Inbound) 48 (Outbound)	Redditch Circular (Inbound)	Tynsall Ave	Mon to Sat - every 30 mins, Sun - every hour New service from Sept 2015, which replaces the 55/56 service for this Area in terms of frequency

The hourly services that serve Area 4 are scheduled to arrive at the Foxlydiate PH bus stop at approximately half-hourly intervals of each other. If additional walking distances are taken into consideration (see Table 2 in the main narrative for details), then an additional service can be accessed, which increases service provision to a bus at approximately 15 minute intervals, making the Town Centre and the transport interchange readily accessible. The cumulative walking distance to access additional and more frequent services is comparable to the walking distance for Area 3, if not slightly less.

Service No.	Route	Bus Stop	Frequency
<b>Area 5</b>			
143 (Inbound)	Bromsgrove to Redditch	Adj. Tack Farm	Mon to Sat - every hour, No Sunday service
X3 (Inbound)	Kidderminster via Bromsgrove to Redditch	opp. Foxlydiate PH	Mon to Sat - every hour, Sun - 3 journeys
51 (Outbound)	Batchley Circular	Foxlydiate Crescent	Mon to Sat - every 10 mins, Sun - every 20 mins

Bus provision from the nearest bus stop to Area 5 is limited to an hourly service. However, additional walking distances, which are comparable to those applied to Areas 3 and 4, increase access to a scheduled service that runs at 10 minute intervals from Foxlydiate Crescent, making the Town Centre and the transport interchange readily accessible.

Service No.	Route	Bus Stop	Frequency
<b>Area 6</b>			
50			Service discontinued
51 (Outbound)	Batchley Circular	adj. Batchley Rd junction	Mon to Sat - every 10 mins, Sun - every 20 mins
52			Service discontinued
145			Service discontinued
146 (Outbound)	Birmingham via Alvechurch to Redditch	opp. Windsor Road	Mon to Sat - hourly, No Sunday service
182 (Outbound)	Lickey via Alvechurch to Redditch	opp. Windsor Road	Mon to Fri - 1 service daily, No weekend service
183 (Outbound)	Bromsgrove via Lickey and Alvechurch to Redditch	opp. Windsor Road	Mon to Fri - 1 service daily, No weekend service

Area 6 benefits from the most frequent bus service, which runs at 10 minute intervals from its nearest bus stop at Batchley Road, making the Town Centre and the transport interchange readily accessible.

Service No.	Route	Bus Stop	Frequency
<b>Area 8</b>			
146 (Outbound)	Birmingham via Alvechurch to Redditch	Birmingham Rd opp. Petrol filling station	Mon to Sat - hourly, No Sunday service
182 (Outbound)	Lickey via Alvechurch to Redditch	Birmingham Rd opp. Petrol filling station	Mon to Fri - 1 service daily, No weekend service
183 (Outbound)	Bromsgrove via Lickey and Alvechurch to Redditch	Birmingham Rd opp. Petrol filling station	Mon to Fri - 1 service daily, No weekend service
517 (Outbound)	Wootton Wawen to Redditch	Icknield Street	Mon to Fri - 2 services daily, Sat - 1 daily, No Sunday service
X50 (Inbound)	Birmingham via Wythall to Redditch	Icknield Street	Mon to Fri - 4 afternoon services, Sat - 1 afternoon service, No Sunday service
519 (Outbound)	Solihull via Earlswood to Redditch	Tanhouse Lane	Mon, Thurs and Sat - 1 afternoon service, No Sunday service
50A			Service discontinued

Area 8 is remote in relation to regular and frequent bus services. From its nearest bus stop, it is only possible to access an hourly bus service into Redditch. Other services which can be accessed from bus stops slightly further afield fail to increase accessibility to Redditch in a useful capacity. An hourly peak-time bus service is not conducive to facilitate effective onward travel movements.

Service No.	Route	Bus Stop	Frequency
<b>Area 11</b>			
146 (Outbound)	Birmingham via Alvechurch to Redditch	opp. Cobbs Barn Farm	Mon to Sat - hourly, No Sunday service
143			Bus stop beyond a reasonable distance to Area 11R

Area 11 is remote in relation to regular and frequent bus services. From its nearest bus stop, it is only possible to access an hourly bus service into Redditch, which is not conducive to facilitate effective onward travel movements. There are no alternative services which are accessible from Area 11.

Service No.	Route	Bus Stop	Frequency
<b>Area 18</b>			
512 (Outbound)	Stratford via Studley to Redditch	A435/ Henley Road	Mon only - 1 am service, No weekend service
62 (Outbound)	Redditch Circular	Mill Hill Road	Mon to Sat - hourly, No Sunday service
57 (Outbound) 58 (Inbound)	Matchborough Circular	Matchborough Centre	Mon to Sat - every 10 mins, Sun - every 15 mins

Area 18 benefits from no regular or frequent bus service from the A435/ Henley Road bus stop. However, if additional comparable walking distances are taken into consideration, then Area 18 is capable of accessing a scheduled 10 minute bus service from Matchborough Centre, which offers the most frequent bus service, making the Town Centre and the transport interchange readily accessible.

## **Appendix k.**

### References

#### **Bromsgrove Documents**

- CDB 1.1 Bromsgrove District Plan Proposed Submission Document
- CDB 1.2 Bromsgrove District Plan Proposed Submission Document Track Changes (February 2014)
- CDB 1.3 Schedule of Minor Recommended Changes to the Bromsgrove District Plan (February 2014)
- CDB 1.4 Duty to Co-operate Statement
- CDB 1.6 Consultation Statement (September 2013)
- CDB 1.7 Regulation Section 22(1) (c) (v) (February 2014)
- CDB 1.13 / CDB1.13 Bromsgrove Infrastructure Delivery Plan (IDP)
- CDB 2.1 Bromsgrove Issues and Options 2005
- CDB 2.2 Bromsgrove Issues and Options Consultation update in 2007
- CDB 2.3 Bromsgrove Draft Core Strategy 1 (2008) October 2008
- CDB 2.4 Bromsgrove Draft Core Strategy 2 (DCS2) January 2011
- CDB 3.1 Housing Growth Development Study Sustainability Appraisal (January 2013)
- CDB 3.7 Bromsgrove Sustainability Appraisal Scoping Report update 2012- 2015
- CDB 3.8 Bromsgrove Sustainability Appraisal Scoping Report update 2008- 2011
- CDB 3.9 Bromsgrove Sustainability Appraisal Scoping Report 2004- 2007
- CDB 3.12 Sustainability Appraisal of Bromsgrove District Plan Proposed Submission Version (September 2013)
- CDB 4.7 Consultation Report on Core Strategy Issues and Options
- CDB 5.1 National Planning Policy Framework (March 2012)
- CDB 6.4a Worcestershire CIL Viability Study
- CDB 6.4b Worcestershire CIL Viability Study Executive Study
- CDB 7.2a Worcestershire Strategic Housing Market Assessment Main Report
- CDB 7.2b Worcestershire Strategic Housing Market Assessment Appendix 2
- CDB 7.7 Strategic Housing Land Availability Assessment (2011)
- CDB 8.14 Bromsgrove Development Plan Transport Network Analysis and Mitigation Report
- CDB 8.15 Bromsgrove and Redditch Cross boundary sites (transport modelling) (Jan 2013)
- CDB 9.22 Worcestershire Historic Landscape Characterisation
- CDB 10.2 Bromsgrove Health Profile (2013)

CDB 10.11 Bromsgrove and Redditch Outline Water Cycle Study (May 2012)

CDB 10.12 Bromsgrove and Redditch Strategic Flood Risk Assessment Level 2 (2012)

CDB 10.13 Bromsgrove and Redditch Strategic Flood Risk Assessment Level 1 (2009)

CDB 10.26 Green Infrastructure Baseline Report (2013)

CDB 13.3 North Worcestershire Housing Need Report, Amion Consulting (April 2014)

CDB 13.10 Response from National Federation of Gypsy Liaison Groups following specific consultation on the Worcestershire GTAA (January 2015)

CDB 14.4 West Mercia Police and H&WFRS Statement of Common Ground (November 2014)

CDB 14.8 Five Year Housing Land Supply (January 2015)

### **Redditch Documents**

CDR 1.1 Proposed Submission Minor Amendments Track Changes (February 2014)

CDR 1.3 Draft Statement of Compliance with the Duty to Cooperate (September 2013)

CDR 1.9 Statement of Representations Regulation 22(i)(c)(v) (March 2014)

CDR 1.14 Borough of Redditch Local Plan No.4 Proposed Submission Document (September-November 2013)

CDR 1.16 Redditch Revised Preferred Draft Core Strategy (January/March 2011)

CDR 1.17 Redditch Preferred Draft Core Strategy (October 2008 – May 2009)

CDR 1.18 Core Strategy Issues and Options (May-June 2008)

CDR 3.2 Bromsgrove District Council and Redditch Borough Council Housing Growth Sustainability Appraisal (January 2013)

CDR 3.16 Local Development Framework Sustainability Appraisal Scoping Report (October 2007)

CDR 5.1 Borough of Redditch Infrastructure Delivery Plan Report (March 2014)

CDR 5.5 Review of the A435 ADR and Adjoining Land

CDR6.1 National Planning Policy Framework (March 2012)

CDR6.6a / CDB5.4a West Midlands Regional Spatial Strategy Panel Report (September 2009)

CDR 6.6b West Midlands Regional Spatial Strategy Phase Two Revision Report of The Panel Annexes

CDR 7.5a Worcestershire Strategic Housing Market Assessment Main Report (February 2012)

CDR 7.5b Worcestershire Strategic Housing Market Assessment Redditch Update SHMA Overview Report (May 2012)

CDR 7.5c Worcestershire Strategic Housing Market Assessment Appendix 4 Redditch SHMA Overview Report (Feb 2012)

CDR7.11a Strategic Housing Land Availability Assessment (2009)

CDR 8.4 Employment Lane Review Update 2012

CDR 9.2 Redditch Town Centre Strategy (2009)

CDR 9.3a Town Centre and Retail Study (2008)

CDR 10.5 Redditch Borough Council And Bromsgrove District Council Level 2 Strategic Flood Risk Assessment Final Report (June 2012)

CDR 10.6 Redditch Borough Council And Bromsgrove District Council Outline Water Cycle Study (May 2012)

CDR 10.15 Public Open Space Standards in the Borough (March 2009)

CDR 10.16 Bromsgrove and Redditch Scoping Water Cycle Study (Jan 2009)

CDR 10.18 Bromsgrove District and Redditch Borough Strategic Flood Risk Assessment, Level 1 Report and Appendices (January 2009)

CDR 11.1 Redditch TNAMR Document One Version Six (May 2013)

CDR11.2 Bromsgrove and Redditch Cross Boundary Sites Assessment (March 2013)

CDR 14.1 Redditch Borough Historic Environment Assessment (January 2012)

CDR 17.1 North Worcestershire Housing Need (April 2014)

CDR 18.6 Response to The WMRSS Phase Two Revision Spatial Options Consultation (March 2007)

CDR 18.7 WMRSS Phase Two Revision Draft Preferred Option (December 2007)

CDR 18.23 Borough of Redditch Local Plan No4 Sustainability Appraisal Refresh (2014)

### **Cross Boundary Documents**

CDX 1.1 Housing Growth Development Study (January 2013)

CDX 1.3 Bromsgrove and Redditch Core Strategies Special Consultations on Redditch Expansion (February/March 2010)

CDX 1.4 Study into the Future Growth Implications of Redditch, Second Stage Report (January 2009)

CDX 1.5 Joint Study into the Future Growth Implications of Redditch Town to 2026 (2007)

CDX 1.38 Hewell Grange Estate Setting Of Heritage Assets Assessment (Jan 2013)

CDX 1.47 Addendum to the Housing Growth Development Study and the Housing Growth Sustainability Appraisal (2014)

XB1/2p (Hearing Statement) Appendix 20 - Archaeology Desk Based Assessment

### **Examination Documents (ED)**

ED/2 Response by the Councils dated 4 April 2014 to the Inspector's Note

ED/3 Further Note from the Inspector dated 10 April 2014 in response to ED/2

ED/4 Guidance Notes issued by the Inspector, version1, 10 April 2014

ED/5 Response by the Councils dated 30 April 2014 to the Inspector's Further Note

ED/12 Inspector's Interim Conclusions, 17 July 2014

ED/13 Letter from Bromsgrove District Council to the Inspector submitted on 1 September 2014 in response to the Inspector's Interim Conclusions

ED/14 Housing Needs Assessment – Report in response to the Inspector's Interim Conclusions, Amion Consulting, 29 August 2014

ED/15 Letter from the Inspector to Bromsgrove District Council, 4 September 2014

ED/15a Letter from Bromsgrove District Council to the Inspector, 25 September 2014

ED/ 19 Post-Hearing Note (3 Oct 2014), (Addendum to the HGDS, CDX 1.1)

ED/20 Letter from Redditch Borough Council, 7 October 2014

ED/22 Letter dated 5 November 2014 from Redditch Borough Council

ED/24 Agenda for Matters O1,B1 and B2, Tuesday 2 December 2014

ED/25 Agenda for Matters B3 and B4, Wednesday 3 December 2014

ED/26 Agenda for Matter B5, Thursday 4 December 2014

ED/33 Email from the Councils to the Programme Officer dated 15 January 2015

ED/35 Inspector's Post Hearing Note – July 2015

ED/36 Joint Initial Response from the Councils to the Inspector's Post-Hearings Note – July 2015

ED/37 The Councils' proposed work programme and timetable

ED/38 Inspector's letter to the Councils, 18 September 2015, in response to the Councils' proposed work programme and timetable

ED/39 Councils' response dated 22 October 2015 to the Inspector's letter of 18 September 2015

### **Other Examination Documents (OED)**

OED/3 Statement of Common Ground between Redditch Borough Council and West Mercia Police and Hereford & Worcester Fire and Rescue Service

OED/20 Response by the Home Builders Federation to the Update to Bromsgrove's 5 Year Housing Land Supply

OED/20a Appendix 1 to the Home Builders Federation's response

OED/20b Appendix 2 to the Home Builders Federation's response

OED/20c Appendix 3 to the Home Builders Federation's response

OED/21 Response on behalf of Billingham and Kite to the Update to Bromsgrove's 5 Year Housing Land Supply

OED/22 Response on behalf of Mr Latif to the Update to Bromsgrove's 5 Year Housing Land Supply

OED/23 Response by Birmingham City Council to Bromsgrove's proposed specific retail floorspace requirement

OED/24 Response by Dudley Metropolitan Borough Council to Bromsgrove's proposed specific retail floorspace requirement

OED/25 Response by Redditch Borough Council to Bromsgrove's proposed specific retail floorspace requirement

OED/26 Response by Solihull Metropolitan Borough Council to Bromsgrove's proposed specific retail floorspace requirement

OED/27 Response by South Staffordshire Council to Bromsgrove's proposed specific retail floorspace requirement

OED/28 Response by Stratford-on-Avon District Council to Bromsgrove's proposed specific retail floorspace requirement

OED/29 Response by Wychavon District Council to Bromsgrove's proposed specific retail floorspace requirement

OED/30 Response by Wyre Forest District Council to Bromsgrove's proposed specific retail floorspace requirement

OED/33 Letter to Inspector re: SA Update - Consultation Outcome (May 2015)

OED/33a Borough of Redditch Local Plan No.4 Sustainability Appraisal (May 2015)

OED/33b Changes made to Redditch Sustainability Appraisal

OED/33c Redditch Sustainability Appraisal (May 2015)

OED/34 Updated Bromsgrove District Plan Sustainability Appraisal (May 2015)

OED/35 Summary table of all representations received with officer responses

OED/37 SOCG between BDC and Historic England

OED/39 Borough of Redditch Local Plan No.4 Sustainability Appraisal (March 2015)

PIH/1 Examination of the BDP OAHN - Further queries from the Inspector (7 July 2014)

PIH/2 Response submitted on 14 July 2014 by Bromsgrove District Council to the Further Queries from the Inspector dated 7 July 2014

B3/1 Statement by Bromsgrove District Council

B4/1 Statement by Bromsgrove District Council

## Appendix I.

### Strengths, Weaknesses, Opportunities, Threats (SWOT) analysis

This analysis is not an exhaustive nor does it represent a definitive list of all the issues. It has been produced as a guide to decision making to be used as a comparative tool as it creates a useful mechanism for assisting in the resolution of land use planning issues such as those relating to the comparative assessment of the suitability of sites to meet identified requirements. Its main advantage is that it facilitates comprehensive assessment of both positive and negative factors on a consistent basis. It is not definitive and its limitations are recognised. Its principal drawback is that it is often difficult to distinguish a clear ‘winner’ from the process, since weaknesses and threats will almost invariably arise from any particular option considered. Further, it is not always easy to differentiate between the different categories and sometimes factors could equally be shown as a strength and an opportunity or conversely as a threat and a weakness. The approach inevitably involves an element of value judgement through the weighing up of factors identified in each of the four elements of the analysis in order to include or exclude any particular option from further assessment. It should be noted that no weighting of factors is applied in this analysis. Nevertheless it has been included as a summary of key factors and where they may be judged to sit as it is also recognised as a useful general problem solving technique.

<b>Comparative assessment of 7 areas</b>				
	<b>Strengths</b>	<b>Weaknesses</b>	<b>Opportunities</b>	<b>Threats</b>
<b>Area 3 (excluding the ADR)</b>	First schools located within a reasonable walking distance	Proximity to Norgrove Court on north western boundary causing constraints and high potential for development to harm this heritage asset	Opportunity to improve public transport infrastructure and viability of Public Transport for the benefit of the wider Webheath area	Development would harm GI linkages between Morton Stanley Park and the wider countryside, with poor urban form connections
	No effects of coalescence identified with any settlement	Development extending below the ridgeline of Crumpfields Lane would be prominent from the wider area and would represent sprawl into the countryside	Opportunity for future residents to utilise existing park at Morton Stanley and its recreational offer	Infrastructure costs could threaten the viability of development

	No significant environmental constraints on the site with no SSSI and SWS on the site	Needs significant investment in road infrastructure to enable development in the area	Opportunity to enhance the GI network along the swans brook tributaries corridor	Development on the western side of Redditch has the potential for traffic flows towards Bromsgrove which could cause capacity pressures on the A38
	Sprawl issues minimised	Either sewerage pumping over the ridgeline into the Redditch is required or a costly and less favourable gravity solution is required	Potential to improve the retail offer to benefit the wider Webheath Area	
	Flooding likely to be capable of being mitigated	Integration back into the urban area of Redditch is difficult	Opportunity to enhance the GI network along the route of Monarchs Way	
		Limited existing retail facilities in the area	Opportunity to enhance the National Cycle Route No.5	
		Area of flood risk through the western parts of Area		
		Roads around the edge of the area offer little in the way of screening to aid visual containment to check development sprawl		
		Access to Public Transport is currently of a poor standard. Likely to be heavy reliance on car based travel without investment in Public Transport and walking and cycling		
		The area has a 20.1-60%		

		likelihood of BMV Agricultural land		
		No connectivity or integration with Callow Hill estate, thus leaving development in the south east of the area isolated from the urban area		
		Potential impact on other historic assets in the area with five listed buildings		
		High and Medium Landscape sensitivity therefore sensitive design would be required to mitigate the impact on the landscape		
<b>Area 3 (Webheath ADR only)</b>	Easy access to Redditch Town Centre from the northern part of the area by several routes	Either sewerage pumping over the ridgeline into the Redditch is required or a costly and less favourable gravity solution is required	Opportunity to improve public transport infrastructure and viability of Public Transport for the benefit of the wider Webheath area	
	Capable of providing a defensible Green Belt boundary at the Crumpfields Lane ridge	Limited existing retail facilities in the area	Potential to improve the retail offer to benefit the wider Webheath Area	
	First schools located within a reasonable walking distance	Access to Public Transport is currently of a poor standard. Likely to be heavy reliance on car based travel without investment in Public Transport and walking	Opportunity to enhance the GI network along the route of Monarchs Way	

		and cycling		
	No effects of coalescence identified with any settlement	High and Medium Landscape sensitivity therefore sensitive design would be required to mitigate the impact on the landscape	Opportunity to enhance the National Cycle Route No.5	
	No significant environmental constraints on the site with no SSSI and SWS on the site	The area has a 20.1-60% likelihood of BMV Agricultural land		
	The Webheath ADR part of the area offers good connectivity to existing built form and would relate well to the urban area			
	Part of the area is not designated Green Belt land as others areas are			
	The Webheath ADR part of the area has the ability to connect easily into the existing highway network			
	Sprawl issues minimised			
	Flooding likely to be capable of being mitigated			

<b>Area 4</b>	Ability to identify strong defensible GB boundary	Part of site at the north has greater than 60 % BMV Agricultural land and the rest has 20.1%-60% likelihood of BMV	Opportunity to improve infrastructure and viability for the benefit of wider Webheath i.e. public transport	Heritage assets identified which could limit site capacity
	Effects of sprawl coalescence and encroachment capable of being minimised except in the western segments	Source Protection Zone within the area offering a constraint to development	Opportunity to enhance the GI network using the wooded areas as environmental and landscape assets, particularly to the east of the area	Development on the western side of Redditch has the potential for traffic flows towards Bromsgrove which could cause capacity pressures on the A38
	Northern parts offer very good containment of the area	Containment of southern sections would require more sensitive masterplanning	Opportunity to enhance the GI network along the route of Monarchs Way and other public rights of way	Threat of coalescence with Tardebigge
	Three bus services available within 1km of the site making it accessible from northern and western parts of the site	Environmental constraints within the site (two SWS)	Potential to improve the retail offer to benefit the wider Webheath Area	
	Flooding likely to be capable of being mitigated	Limited existing retail facilities in the area	New accessible highway routes can be provided to link the Webheath area with the A448	
	Capable of relating to existing urban form of Redditch and relate to the existing community	Difficult to overcome some linkages back into Webheath area	Potential for strong defensible and long term Green Belt boundaries within the area	
	No unreasonable infrastructure cost above which would be expected for a site of this size	Without significant improvements to the public transport network and walking and cycling, there is likely to be heavy reliance on car based travel in the less accessible parts	Opportunity to enhance the GI network along the route of Swans Brook	

		of Area 4 (south-west)		
	Reduction of Green Belt gap between Redditch and Finstall but effects of sprawl, coalescence and encroachment are capable of being minimised	Sewerage pumping over ridge into east Redditch is required	Opportunity to improve upon linkages to the cycle network	
	Green Belt loss and the harm it causes is potentially less significant than other areas	High and Medium landscape sensitivity therefore sensitive design would be required to mitigate the impact on the landscape		
	Very few Tree Preservation Orders in this area			
<b>Area 5</b>	Good urban form connection to Redditch at Batchley	Identified Harm to Heritage assets	Opportunity to enhance the GI network using the wooded areas and connecting hedgerows as environmental and landscape assets, particularly to the north and north east	Heritage assets impact of development on Hewell Grange Grade II* Registered Park and Garden
	Good access to public transport from parts of the area nearest to existing development (south east and east of the Area)	Most of site has a greater than 60 % BMV Agricultural land and parts in the east and south east parts of the area has a 20.1% - 60% likelihood of BMV	Opportunity to enhance the GI network utilising existing footpaths permeating the existing Brockhill estate	Some limited impact is likely to threaten the Strategic Green Belt gap between Redditch and Birmingham

	Potentially less reliance on private car than other areas	High and Medium landscape sensitivity therefore sensitive design would be required to mitigate the impact on the landscape	Potential enhancement of the vitality and viability of Batchley District Centre	Development on the western side of Redditch has the potential for traffic flows towards Bromsgrove which could cause capacity pressures on the A38
	Reasonable access to nearby education facilities	Local improvements will be required to wastewater infrastructure , but pumping of wastewater won't be required	Potential for strong defensible and long term Green Belt boundaries within the area	Threat of downstream flooding from Batchley Brook where there are numerous records of historic flooding
	The valley is topographically well contained	Environmental constraints within the site (one SWS and one SSSI)		
	No unreasonable infrastructure cost above which would be expected for a site of this size	Tree Preservation Orders in the west of the area associated with Hewell Grange Conservation Area		
		High points at the south-western and northern boundaries are visually prominent. This also affects the rural nature of the setting of the Hewell Grange Conservation Area		
	Effects of sprawl, coalescence and encroachment capable of being minimised except for in the south west of the area	Without significant improvements to the public transport network there is likely to be heavy reliance on car based travel		
	Flooding likely to be capable of being mitigated			

<b>Area 6</b>	Ability to identify a strong defensible GB boundary	High landscape sensitivity therefore sensitive design would be required to mitigate the impact on the landscape	Opportunity to consolidate education provision and enable further integration of communities	
	Close to Redditch Town Centre	All of the area has a 20.1-60% likelihood of BMV Agricultural land	Potential enhancement of the vitality and viability of Batchley District Centre	
	No effects of coalescence identified	Local improvements will be required to wastewater infrastructure, but pumping of wastewater won't be required	Opportunity to enhance the GI network utilising the Red Ditch corridor	
	Capable of relating to existing urban form of Redditch and relate to existing community	Without significant improvements to the public transport network there is likely to be heavy reliance on car based travel especially on the northern periphery of the Area which is more distant from existing facilities	Potential for strong defensible and long term Green Belt boundaries within the area	
	Effects of sprawl coalescence and encroachment capable of being minimised by topography and ridgeline and Weights Lane	No public rights of way in the area but to ensure permeability new footpaths would need to link with existing footpaths outside the area	Opportunities to improve upon walking and cycling provision to reduce car reliance, particularly to Redditch Town Centre	
	Limited environmental constraints with no identified assets in the area			
	Good access to educational facilities			

	Good access to public transport from parts of the area nearest to existing development (except for the northern periphery)			
	Good visual containment possible from the wider countryside			
	Limited flood risk areas, and where flood risk is identified mitigation has been employed on early phases of the development that is under construction			
	No unreasonable infrastructure cost above which would be expected for a site of this size			
	Only limited impact on the Strategic Green Belt gap between Redditch and Birmingham			
	Likely to disperse movement on the local and strategic highway networks more evenly than other locations			
	No Tree Preservation Orders in the area			
	No heritage assets identified in the area (no listed buildings)			

<b>Area 8</b>	Closest area to the trunk sewer compared to other areas	Potential for unrestricted sprawl due to lack of defensible Green Belt boundary	Possible provision of Bordesley By-pass dependent on viability/feasibility testing	Development would harm GI linkages between the Arrow Valley Park and the wider countryside
	Public rights of way may offer potential to access the Arrow Valley Park for recreation, although they are currently fragmented footpaths that require improvements	Inability to identify strong defensible Green Belt boundary	Opportunity for future residents to utilise existing park at Arrow Valley and its recreational offer	Development could lead to coalescence with Rowney Green and Bordesley
	Reasonable walking distance from leisure facilities to encourage a healthy lifestyle	Due to the topography development here would be prominent and could constitute sprawl especially due to weak intermediate GB boundaries to contain development.	Opportunity to enhance the GI network utilising the mature hedgerows and field boundaries	Development would lead to a significant reduction in the Green Belt gap between Redditch and Alvechurch and the West Midlands conurbation
		Difficulty in relating to existing urban form and communities of Redditch, with the park segregating the area from the remainder of the town	Marginal positive impact on the vitality and viability of Church Hill District Centre and Alvechurch District Centre	Development could encourage commuting northwards, exerting pressure on the A441 and the A435 northwards
		Environmental constraints and potential for harmful impact with a SWS running through the area		
		Area is distant from the Town Centre		
		Flood risk constraints whilst can be mitigated could affect overall site capacity		

		Few services and facilities are within a reasonable walking distance		
		Visually prominent when viewed from surrounding areas due to topography and general openness of the area		
		Majority of the area has a 20.1-60% likelihood of BMV Agricultural land and a part of the area in the eastern half has a greater than 60% likelihood		
		Potential for harmful effects on the historic environment with a number of historic assets in the area		
		Area will require significant investment in walk and cycle infrastructure in order to provide the necessary level of accessibility to/from the area		
		Without significant improvements to the public transport network there is likely to be heavy reliance on car based travel. A new bespoke system would be required.		
		Areas of flood risk within the area		

		Scrap yard with its 250m exclusion zone offers a constraint to development		
		Cluster of Tree Preservation Orders offering a constraint to development in the south western corner of the area		
		Medium and high landscape sensitivity therefore sensitive design would be required to mitigate the impact on the landscape		
<b>Area 11</b>	South and East parts of the area could be well contained by existing features	High landscape sensitivity therefore sensitive design would be required to mitigate the impact on the landscape	Possible provision of Bordesley By-pass dependent on viability/feasibility testing	Development could lead to coalescence with Tutnall, Bordesley and Tardebigge
	Possibility of identifying a strong defensible Green Belt boundary depending on area 6 being developed up to its area boundary, on a small part of the site	In the West of the area development would be prominent and represent sprawl into the countryside	Potential enhancement of the vitality and viability of Batchley District Centre	Development would lead to a significant reduction in the Green Belt gap between Redditch and Alvechurch and the West Midlands conurbation
	Reasonable walking distance from leisure facilities to encourage a healthy lifestyle	Flooding constraint whilst can be mitigated could seriously affect overall site capacity	Opportunity to enhance the GI network utilising the mature hedgerows and wooded areas and the areas of flood risk	Development could encourage commuting northwards, exerting pressure on the A441 and the A435 northwards
	No historic designations within the area presenting major	Difficulty in relating to existing urban form and communities of	Opportunity to enhance the currently poor public rights of	

	constraints to development	Redditch	way network	
		Site not physically capable of being developed in isolation	Opportunity to enhance the viability of services associated with the nearby Brockhill development which has planning permission	
		Potential for harm to the natural environment (four SWS and ancient woodland on site, primarily to the west of the area)		
		Access to public transport is particularly poor in the North and West parts of the area		
		Site not considered suitable for large scale residential development being more suited to employment but Redditch has no need for additional employment land		
		Development of full area wraps around the Hewell Grange Conservation Area and Historic Park and Garden on three sides, affecting the setting of the south and south-western aspects of the assets. Listed buildings under threat in the North West		
		Likely to have significant		

		infrastructure costs		
		Local improvements will be required to wastewater infrastructure, but pumping wont be required		
		Worcester and Birmingham canal Conservation Area runs through a large part of the area to the North West		
		Land bounding the River Arrow has a greater than 60 % likelihood of BMV Agricultural land and the remainder has a 20.1% -60% likelihood of BMV		
		Without significant improvements to the public transport network and walking and cycling, there is likely to be heavy reliance on car based travel		
		Tree Preservation Orders around Butlers Hill Wood offering a constraint to development		
<b>Area 18</b>	Benefits from not being designed as Green Belt like other areas are	LWS adjacent to the northern part of the area causing some constraint	Potential enhancement of the vitality and viability of Matchborough District Centre and Winyates District Centre	Development has the potential to affect the adjacent settlement of Mappleborough Green

	Very accessible to first schools, more so than other areas accessibility	Flood risk areas on the very southern parcels of the area	Potential to enhance the walking and cycling infrastructure in the area	
	Capable of relating to existing urban form of Redditch and relate to existing community	Local improvements will be required to wastewater infrastructure, but pumping wont be required	Potential to enhance the existing bus service provision by extending the route or increasing capacity	
	Very accessible to bus provision, more so than other areas accessibility	The presence of Tree Preservation Orders will affect the site layout	Allotments offer a valuable and well used parcel of open space	
	No environmental designations in the area	1 listed building identified		
	Limited flood risk other than in the southern corner of the area	The whole area has a 20.1-60% likelihood of BMV Agricultural land		
	No unreasonable infrastructure cost above which would be expected for a site of this size, unless the Bordesley Bypass is required	Includes land in two Local Authority areas		
	Current area already provides defensible Green Belt boundary	Medium and high landscape sensitivity therefore sensitive design would be required to mitigate the impact on the landscape		
		Distance from Town centre		



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**Bromsgrove**  
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**Bromsgrove District Council and Redditch Borough Council  
Planning and Regeneration**

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