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# Redditch Green Belt Release to meet Growth Needs

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# Executive Summary

## Purpose of the Study

This study has been prepared to explore the potential release of Green Belt land within Redditch in order to meet Redditch's development needs. In particular the focus of this study is to examine the two Green Belt areas in the north of the Borough.

The Green Belt located to the south west of the Borough has been extensively reviewed in other evidence base studies and is not considered in this study.

The preparation of a Local Plan is the appropriate place to consider whether an existing Green Belt should be altered. It is also the appropriate time to consider whether the Green Belt boundaries have the necessary degree of permanence, in the light of identified and potential future development requirements, to be capable of enduring beyond the Plan period.

## Methodology

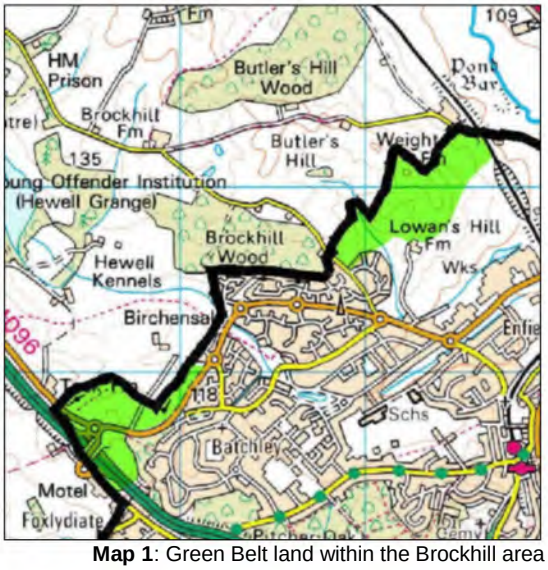
The methodology for this study is based upon elements of methodologies that have been derived from an evaluation of other best practice assessments.

The methodology consists of:

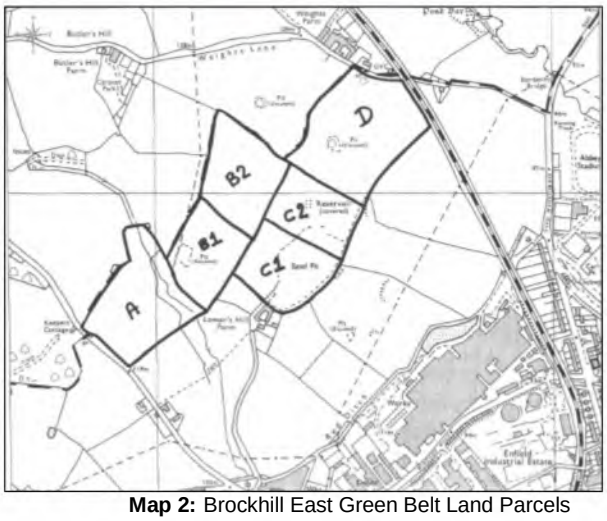
Planning Policy context – a detailed policy review is essential in order to determine which elements of the National Planning Policy Framework (NPPF) are relevant to the study. The policy review also determines which aspects of the Regional Spatial Strategy for the West Midlands are relevant for consideration. The study also contains a review of local evidence undertaken to date.

Context to the Redditch Green Belt in Redditch – this is included to help understand the areas being assessed. The study focuses on the assessment of the Redditch Green Belt areas only, both located within the Brockhill area of the Town. The Brockhill West area of Green Belt has sometimes previously been referred to as Foxlydiate Green Belt; however for the purposes of this study this area of Green Belt will be termed Brockhill West. The study then divides the two Green Belt parcels into smaller sections of land, which are more suitable for assessment purposes.

The two areas of Green Belt assessed through this study are Brockhill East and Brockhill West:




**Map 1**: Green Belt land within the Brockhill area




**Map 2:** Brockhill East Green Belt Land Parcels

**Map 3:** Brockhill West Green Belt Land Parcels

The study then moves on the main section of the assessment work, which is split into two stages.

### Stage 1 – Initial Site Sieving

This first stage of assessment evaluates each of the Green Belt parcels against the five purposes of Green Belt. The purposes are identified by Central Government traditionally set out in PPG 2 'Green Belts' and subsequently the NPPF. Each of the parcels within the two Green Belt areas will be examined to determine the relative importance of each parcel to the five criteria. If a parcel of land does fulfil the purpose one mark is given (identified with a +). If a parcel of land does not fulfil the purpose no marks will be given (identified with a -).

The five Green Belt Purposes are:
1. To check the unrestricted sprawl of large built-up areas
2. To prevent neighbouring towns merging into one another
3. To assist in safeguarding the countryside from encroachment
4. To preserve the setting and special character of historic towns
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Following this first stage of assessment there was one parcel of land at Brockhill East (D) that was deemed appropriate to retain as Green Belt and one parcel of land at Brockhill West Green Belt (B). In addition land parcel D1 was not carried forward to the stage 2 assessment as this parcel of land would be physically unviable to develop.

### Stage 2 – Site Constraints Identification

Each land parcel which does not fulfil a Green Belt purpose was considered against all other site constraints that could potentially limit development opportunities for example environmental designations (such as Local Nature Reserves or Special Wildlife Site) or flood risk, a comprehensive assessment is provided under each site assessment.

Following the second stage of assessment there was one parcel of land at Brockhill East that was deemed inappropriate to develop due to site constraints (A) and two parcels of land at Brockhill West that were deemed inappropriate to develop (C and G) due to site constraints.

### Stage 3 – Conclusions

With regard to Brockhill East there are two land parcels that could be fully released in their entirety from the Green Belt in this area and contribute towards meeting development needs. These are land parcels B1 and C1. There are also two land parcels could be partially released from the Green Belt to contribute towards meeting development requirements. These are land parcels B2 and C2. The release of these land parcels should be sensitive to the topographical features of the area, with development being restricted to lower ground. Development should not occur on higher ground as it would be too visually prominent from elsewhere in the town, and therefore appear to impinge upon the Green Belt. Land parcel D is not appropriate for development as it serves Green Belt purposes, however it may be appropriate to accommodate some infrastructure requirements on this land.

With regard to Brockhill West there are four land parcels that could be fully released in their entirety from the Green Belt in this area and contribute towards meeting development needs. These are land parcels A, D2, E, and F. Land Parcels D2 and E should only be released if it is deemed appropriate to consider land wider than this Green Belt parcel for development ensuring that appropriate and defensible Green Belt boundaries can be identified. Land parcel B is not appropriate for development as it serves Green Belt purposes. Land parcel D1 is not appropriate

for development as it is not physically viable to develop. Land parcels C and G are not appropriate for development due to local designation constraints.

In conclusion this study has identified that there some parcels of land at Brockhill East and West that are suitable for development and therefore can be removed from the Green Belt.

# 1. Introduction

1.1 This study has been prepared to explore the potential release of Green Belt land within Redditch in order to meet Redditch's development needs (the need to use Green Belt land to accommodate some of the development is based upon exceptional circumstances (these exceptional circumstances are the subject of other evidence base documents [1],). The focus of this study is to examine the Green Belt in the north of the Borough, to examine potential release of this land (the Green Belt located to the south west of the Borough has been extensively reviewed in other evidence base studies[2]). The preparation of a Local Plan is the appropriate place to consider whether an existing Green Belt should be altered. It is also the appropriate time to consider whether the Green Belt boundaries have the necessary degree of permanence, in the light of identified and potential future development requirements, to be capable of enduring beyond the Plan period. This study therefore considers whether the existing Green Belt boundaries within Redditch are appropriate and examines the issue of their permanence.

1.2 There may be a rationale for the inclusion of land in the Green Belt and this will be explored. In some places the rationale will be relatively weak and in other areas it will be stronger. Therefore, there is a need to identify where sensitive boundary alterations can be made to ensure that long term sustainable development needs can be met, on land removed from the Green Belt. This makes a presumption that because of the very limited land availability within the Borough, which is evidenced elsewhere, that the release of Green Belt sites remains as the sole option for accommodating growth.

1.3 The study has been devised with what is considered to be a robust methodology for a strategic and consistent review of the Green Belt areas within Redditch which is specifically relevant for the local area.

1.4 There is a caveat attached to this study which must be acknowledged as a limitation to the exercise. There will is a further review of the wider Green Belt area beyond Redditch's boundary in order to fully accommodate Redditch's development needs, that study has been completed separately from this review which focuses on Redditch's Green Belt areas only. Integration of the findings of the wider study will be instrumental in recommending the final conclusions to this study.

[1] The Strategic Housing Market Area Assessment (2012) and Employment Land Review (2012) demonstrate the land required to accommodate the growth needs.

[2] A study of Green Belt land and ADR within Redditch Borough (2008)
White Young Green Study into the Future Growth Implications of Redditch Town to 2026 (2007) (WYG 1)
White Young Green Study into the Future Growth Implications of Redditch Second Stage Report (2009)

## 2. Methodology

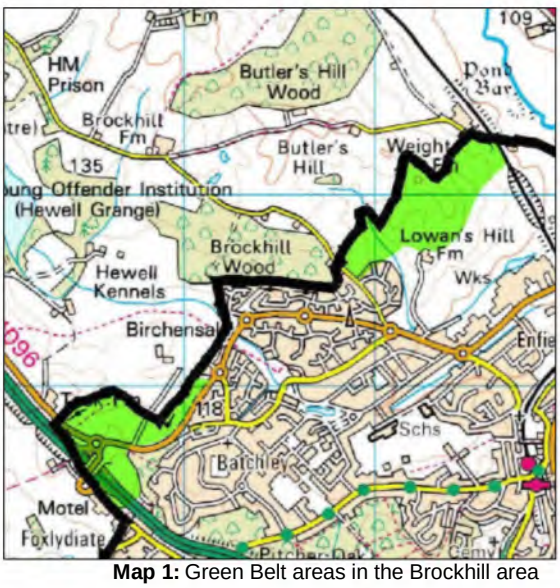
2.1 The methodology for undertaking the review of the Green Belt parcels located within Redditch is considered to be robust and based upon elements of methodologies that have been derived from an evaluation of other best practice assessments[3].

2.2 A context will be provided through a detailed policy review which is essential in order to determine which elements of the National Planning Policy Framework (NPPF) are relevant to this study. The policy review will also be able to determine which aspects of the Regional Spatial Strategy for the West Midlands will be relevant for consideration in this study, and some review of local evidence undertaken to date will provide some more useful local insight.

2.3 A context to the Redditch Green Belt is included to help understand the areas being assessed.

2.4 The study focuses on the assessment of the Redditch Green Belt areas only, both located within the Brockhill area of the Town (and can be seen below at map 1). The study then divides the two Green Belt parcels into smaller sections of land (each parcel of land will be assigned a reference letter). This will make the process of assessment easier to manage and allow for a closer inspection of the sites. The following paragraphs will detail the methodology that has been followed for each section of the assessment. The methodology is split into three stages:

Stage 1 - Initial Site Sieving
Stage 2 - Site Constraints Identification
Stage 3 - Conclusions




**Map 1:** Green Belt areas in the Brockhill area

[3] Strategic Green Belt Review Final Report (February 2006) South West Regional Assembly
Cambridge Green Belt Study Final Report (2002) South Cambridgeshire District Council
Tamworth Local Plan Review Green Belt Appraisal (2012) Lichfield District Council
Green Belt Review Methodology Consultation Evidence Base (November 2008) Calderdale Council

### Stage 1 Initial Site Sieving

2.5 This first stage of assessment evaluates each of the Green Belt parcels against the five purposes of Green Belt. The purposes are identified by Central Government traditionally set out in PPG 2 'Green Belts' and subsequently the NPPF. Each of the parcels within the two Green Belt areas will be examined to determine the relative importance of each parcel to the five criteria.

2.6 An element of this assessment will consider the implications of Green Belt release on a wider area than the Green Belt parcel being assessed. This is because in some cases it is recognised that it will be difficult to determine whether or not the purpose of including that parcel within the Green Belt is justified, especially where the adjoining area is not currently designated as Green Belt. Similarly where the Green Belt boundary abuts the Borough boundary, this boundary will need to be considered to see what the physical effects would be of changing the designation.

2.7 To be able to make judgements on the strength of each parcels performance against the purposes of Green Belt, a common method for assessing the strength of each parcel will be employed. This will be done through a scoring system applied to each of the Green Belt parcels against which each purpose will be assessed.

2.8 The inclusion of land in the Green Belt must fulfil one of the five main purposes in order to be considered suitable as Green Belt. Only if sites could be released without significant detriment to the Green Belt, should suitability for development be considered further (and therefore taken forward to the next stage of assessment).

### Green Belt Purposes

2.9 The purposes of Green Belt have been analysed in order to make the reasons for including land in Green Belt more relevant to the Redditch area. This exercise commenced through joint working with neighbouring authorities as part of the wider Green Belt Review therefore the local definitions have been aligned for consistency.

2.10 The NPPF (paragraph 80) states that the Green Belt serves five purposes. These purposes have been examined to consider their importance relative to the Redditch context.

- *"to check the unrestricted sprawl of large built-up areas"*

2.11 Each parcel will be examined to identify its relationship with the existing built up area of Redditch. Each parcel will be examined to recognise what degree of containment is currently being provided by the Green Belt to the existing urban edge of Redditch and how any potential development would alter that level of containment. If land were to be released at the edge of Redditch's urban area it would require clear definition and must be able to be contained by strong boundaries to prevent sprawl. However in the first instance to assess the land parcels the physical attributes of the land parcels will be considered e.g. does it sensibly round off an existing built up area with good urban form, what sensible existing physical boundaries are in the vicinity, how will the land form affect the purpose or the topography, ridgelines or valleys.

2.12 The extent to which this Green Belt purpose is relevant at the local level can be determined by assessing each land parcel against the relative width of the functional Green Belt gap between the larger Redditch urban area and the surrounding area on a strategic basis. The subsequent impact any future development would have on this gap requires consideration.

2.13 To assess the strength of the existing or potential proposed Green Belt boundaries in more detail, the following table lists details how boundaries have been classified.

### Boundary descriptions

| Strong | Weak |
|---|---|
| Motorway | Disused railway lines |
| District distributor road | 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 |

2.14 Strong boundaries are those that can be retained in the long term and are extremely difficult to alter or destroy by physical means or as a result of a planning decision. Weak boundaries are generally those that are visible but can be easily altered or destroyed by physical means or as a result of planning decisions. In this context, a boundary is defined by a recognisable linear feature between two separate areas of land. When identifying any potential new Green Belt boundaries, strong boundaries will be used wherever possible. Where it is not possible, a suitable strong boundary must be capable of being created in the right location. Strong boundaries significantly contribute towards preventing sprawl.

- *"to prevent neighbouring towns merging into one another"*

2.15 The strategic importance of the relationship between each of the land parcels and the wider Green Belt area must be considered in the context of this purpose. This would therefore require consideration of the role of the wider Green Belt to be able to retain the Green Belt gap between the outlying settlements i.e. Birmingham and Bromsgrove.

2.16 As with the previous Green Belt purpose, the width of the Green Belt gap between settlements and the impact of any potential development on this gap must be reviewed to assess whether development would appear to actually merge the built up areas or would reasonably be expected to do so in the longer term. As stated previously, strong defensible Green Belt boundaries assist in clearly setting the containment parameters of developable areas.

2.17 The outcome should be to evidence if the land parcel under review has an important role in preventing towns merging and the extent of that importance. Where land parcels are deemed to be very important in preserving the separate settlements, this land parcel's Green Belt designation should be retained.

- *"to assist in safeguarding the countryside from encroachment"*

2.18 Each land parcel will be assessed to examine the extent to which the Green Belt parcels could constitute open countryside by looking at its character in relation to the existing setting (i.e. is it urban fringe or wider countryside). The extent to which any proposed changes to the parcel would have on that individual parcel will be difficult to determine in isolation, therefore many of the conclusions about each land parcel will need to be made following consideration of potential changes to a wider area. Some parcels of land, if they are proposed to be developed in combination with other parcels may result in the

encroachment of urban form into a heavily characterised Open Countryside setting which should be avoided.

- *"to preserve the setting and special character of historic towns"*

2.19 The Borough and surrounding areas contain no historic towns and therefore the majority of the analysis related to the potential effects of Green Belt release on historic assets will be undertaken as part of site specific analysis (Stage 2 assessments). Parts of the Borough and adjoining District of Bromsgrove do have historic significance so it is relevant to consider this purpose in this study. If a land parcel has a strong relationship to an historical feature such as listed buildings and its settings, or other Historic assets of national, regional or local interest then this will be considered.

- *"to assist in urban regeneration, by encouraging the recycling of derelict and other urban land"*

2.20 This purpose of Green Belt is not particularly relevant to the parcels of Green Belt being assessed through this study, as this is difficult to achieve in Redditch due to the lack of potential for urban regeneration to meet the full requirements for growth.

2.21 In summary, the first three purposes of Green Belt are the most relevant for the assessment of the Green Belt parcels for Redditch at this stage and therefore only these purposes will be assessed. The following scoring will be applied:

+ = the parcel of land does fulfil the purpose (**one** mark will be given)
- = the parcel of land does not fulfil the purpose (**no** marks will be given)

2.22 The Green Belt parcels with the lowest scores may be suitable for development and will be taken forward for a Stage 2 assessment.

2.23 The Stage 1 analysis only considers the parcels of land in Green Belt terms, there may be other land designations which would restrict development on these parcels of land but these will be assessed during Stage 2.

### Stage 2 Site Constraints Identification

2.24 Each land parcel which does not fulfil a Green Belt purpose will be considered against all other site constraints that could potentially limit development opportunities for example environmental designations (such as Local Nature Reserves or Special Wildlife Site) or flood risk, a comprehensive assessment is provided under each site assessment.

### Stage 3 Conclusions

2.25 This section will pull together the results of the previous two sections and detail which land parcels have the opportunity for development and which areas should be retained as Green Belt.

# 3. Planning Policy Context

3.1 The Green Belt area of Redditch has been subject to a number of studies in the past with a particular historical focus on the South West Green Belt area. This was because the planning system was previously more prescriptive about not crossing local authority boundaries. However, as the plan making process has progressed, as has the national and regional planning system. The national planning system has been fundamentally reformed, and the regional system is currently going a process which is due to culminate in the abolition of the regional level of planning. It is therefore important to ensure that the Redditch Local Plan is prepared in the right context, and in accordance with the most up-to-date guidance. This section of the study will review the current system of planning at the national, regional and local level, all of which will inform the preparation of the remainder of the study. Key points from the review are summarised at the end of this section of the study.

## a. National Planning

3.2 On the 27th March 2012 the Department for Communities and Local Government published the National Planning Policy Framework (NPPF). The NPPF set out the Government's planning policies for England and how these are expected to be applied.

3.3 Importantly, the NPPF replaced Planning Policy Guidance 2: Green Belts, which was the main Government policy for Green Belts since its publication in 1995. However, the NPPF maintains protection for Green Belts.

*"14. At the heart of the National Planning Policy Framework is a **presumption in favour of sustainable development**, which should be seen as a golden thread running through both plan-making and decision-taking. For **plan-making** this means that:*

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
  - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or*
  - *specific policies in this Framework indicate development should be restricted.*

*(For example, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion.)"*

3.4 It is clear that the Local Authority is obliged to provide a framework in its Local Plan to enable development needs to be met. As has been published in other documentation, Redditch has an extremely limited land supply for all types of development, and this alone is considered to justify the exceptional circumstances to consider the alteration of Green Belt boundaries.

3.5 The NPPF clarifies that objectively assessed needs (which are set out in the Strategic Housing Market Assessment) must be met unless there is a reason why they should not be. Some policy constraints like Sites of Special Scientific Interest (SSSI) designations may constrain the ability of the Plan to meet the full requirements; however the ability for Redditch to do this will be explored further through this study and the wider Green Belt Review which considers land outside of the Authority's area.

*"17. Within the overarching roles that the planning system ought to play, a set of core land-use planning principles should underpin both plan-making and decision-taking. These 12 principles are that planning should:*

- *be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up to date, and be based on joint working and co operation to address larger than local issues. They should provide a practical*

*framework within which decisions on planning applications can be made with a high degree of predictability and efficiency;*

- *proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities;*
- *take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it"*

3.6 These three principles from the NPPF are relevant to this study.

3.7 The first principle explains that joint working is important to address wider than local issues. The development needs of Redditch exceeding its capacity is considered to be one of these issues which the Authority has sought cooperation for from neighbouring Local Authorities under the Duty to Cooperate Legislation. The need for a wider Green Belt review therefore reflects this principle in the NPPF.

3.8 The second NPPF principle mirrors earlier statements about providing for all types of quantified development needs.

3.9 The third NPPF principle continues to echo previous planning policy to promote the development of main urban areas (like Redditch) which the Authority has done and will continue to pursue through the Local Plan process. Despite this urban area preference, it is not possible in Redditch to find land to meet the development needs without looking at the options for development on Green Belt land. It is clear however from this principle that there is an expectation that the character and beauty of the countryside must be considered.

*"19. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.*

*20. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century."*

3.10 The significant weight attached to supporting economic growth through the planning system suggests that the need to find land through Local Plans for economic development related purposes has a high importance attached to it at a National level.

*"22. Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities."*

3.11 The Local Plan has been strict on the protection of its allocated employment sites unless it can be demonstrated that there is no reasonable prospect of the site being used for that purpose. The Employment Land Review has reflected the NPPFs requirements and has again reviewed the protection of some of the existing employment areas. However, the impact of the recession locally on vacant B1 (office) units throughout the town, and the quality of the available stock would require some further flexibility which the NPPF provides the context for.

3.12 The land allocations for B1 (office) use in and around Redditch Town Centre are therefore recommended to be relaxed in favour of either conversion to residential units or demolition and regeneration as part of wider regeneration proposals for the Town Centre. This approach would then be complemented by a push for assistance for the occupation of B1 (office) units around the town that benefit from a good strategic location with on-site parking; and a plan for allocations of B1 (office) uses as part of urban extensions where the

provision of units with a higher stock quality can be provided for. This recommendation would make some changes to the housing capacity of the Town in the longer term and would provide post-Plan opportunities for regeneration which would in the future negate the need for such a wide-scale Green Belt release that is required in this Plan period.

*"30. Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport."*

3.13 When determining large strategic growth locations, there are choices that can be made about the best places. In order to ensure that greenhouse gas emissions and congestion are reduced the locations where the very best transport infrastructure and sustainable travel choices are the most sensible areas to look for growth opportunities. This factor has led to conclusions in other local studies about Redditch's best growth location; however this can also be factored into future analysis.

*"31. Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development"*

3.14 Having the infrastructure available to support development is crucial therefore the wider Green Belt Study which considers suitable areas outside of the Borough for development considers the likelihood and issues with infrastructure provision. An Infrastructure Delivery Plan will be prepared in addition to individual studies prepared on behalf of both Councils (for example Transport Assessment and Water Cycle Studies).

*"47. To boost significantly the supply of housing, local planning authorities should:*
- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period"*

3.15 As previously stated, the Strategic Housing Market Assessment provides a robust evidence base to demonstrate the needs for market and affordable housing. There are no significant reasons why the delivery of those needs would conflict with the NPPF; however some policy constraints may affect the full delivery once the wider Green Belt Review is undertaken if it is judged to be unsustainable. The NPPF makes it clear that sites are expected to be identified and the Borough Council's approach to its Strategic Sites is based upon this approach.

*"52. The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities. Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development. In doing so, they should consider whether it is appropriate to establish Green Belt around or adjoining any such new development."*

3.16 In Redditch's case the only obvious way of achieving development would be though extensions to the town, extensions to the villages or new settlements. This study aims to find the best location for that development within the Redditch area. The NPPF asks for consideration of the establishment of Green Belt around the proposed new extension or settlement and this will need to be one of the key considerations in this study, and has also be considered further in the wider Green Belt Review.

*"70. To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*
- *plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;*
- *ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and*

- *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services".*

3.17 When establishing a Local Plan the NPPF requires that the ability to deliver the facilities and services which places rely upon are factored into the decision making. This is an important consideration when undertaking the detailed analysis of sites.

*"76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.*

*77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:*

- *where the green space is in reasonably close proximity to the community it serves;*
- *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- *where the green area concerned is local in character and is not an extensive tract of land."*

3.18 The NPPF has delivered an opportunity for a new kind of designation called Local Green Space. The possibility of the creation of Local Green Spaces may be more appropriately done locally through Neighbourhood Planning however, it should not be ruled out for consideration in the development of this Local Plan. The Green Belt study could therefore consider where opportunities for a Local Green Space designation could exist.

*"79. The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."*

3.19 This paragraph of the NPPF begins to demonstrate the commitment to the importance of Green Belt, and it is clear that its importance continues to relate to the fundamental aim which is to prevent urban sprawl by keeping land permanently open. This aim has not changed from the transition from Planning Policy Guidance 2 and the NPPF.

*"80. Green Belt serves five purposes:*

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

3.20 These five Green Belt purposes have been maintained through the transition from Planning Policy Guidance 2 into the NPPF. It is important that the methodology of the Green Belt study reflects these five purposes as far as is practicable. Some of the purposes can be hard to relate to an individual local area, so it will also be important to try and define what these purposes would mean to the Green Belt areas designated locally.

*"82. The general extent of Green Belts across the country is already established. New Green Belts should only be established in exceptional circumstances, for example when planning for larger scale development such as new settlements or major urban extensions. If proposing a new Green Belt, local planning authorities should:*

- *demonstrate why normal planning and development management policies would not be adequate;*
- *set out whether any major changes in circumstances have made the adoption of this exceptional measure necessary;*
- *show what the consequences of the proposal would be for sustainable development;*
- *demonstrate the necessity for the Green Belt and its consistency with Local Plans for adjoining areas; and*
- *show how the Green Belt would meet the other objectives of the Framework."*

3.21 The Green Belt has been unchanged around Redditch for a number of years, reflecting the provision in PPG2 and now paragraph 82 of the NPPF. Para 82 also refers to the creation of new Green Belt areas. Much of the areas surrounding Redditch are designated as Green Belt therefore there is not likely to be any scope for the creation of new Green Belt areas; however this is a useful paragraph to bear in mind during the study, especially when

looking at the extent of the emerging Strategic Sites on land not currently designated as Green Belt.

*"83. Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period."*

3.22 Redditch Borough has established the Green Belt boundary on its Local Plan Proposals Maps for a number of years, reflecting the Green Belt extent determined through Regional Spatial Strategy and previous to that the Worcestershire County Structure Plan. The Local Plan No.4 Policies Map will also be required to establish the Green Belt boundary on a map base, however the decisions about the extent of the Green Belt are no longer made at the Regional or County Planning level. The long term permanence of the Green Belt is an important consideration, as there is not likely to be a situation where there is no additional growth in the next Plan period. There is not predicted to be a significant pressure on the Green Belt because of the Borough Council's plans for the Town Centre which would enable some longer term regeneration to occur. The likely deterioration of the 1960's and 1970's new town areas are also likely to provide further regeneration scope within the next Plan period. It is of utmost importance that the new Green Belt boundaries are strong and identifiable and that it is clear that these boundaries should remain permanent.

*"84. When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary."*

3.23 The study will need to consider where any Green Belt release is likely to promote sustainable patterns of development, and it is likely that these are going to be in areas located close to Redditch's urban area, or close to places with good access to services and facilities. In broad terms the consequences of the three options for channelling growth has been analysis through sustainability appraisal and previous local study.

3.24 The first option of channelling development towards the urban area is the most logical approach with the most minimal of consequences. There are development opportunities surrounding the urban area, and the infrastructure capacity exists to be able to provide this development in some locations.

3.25 The second option of channelling development to the villages inset within the Green Belt has a number of issues. Feckenham village is a fair distance from the urban area and is considered to be unsustainable as a settlement in its own right. There are only some limited services and facilities in the village to support the village's local needs. The majority of the village is within a Conservation Area, and there are a number of other constraints such as flood risk and poor infrastructure provision, which compounds this as unsustainable location for development.

3.26 The last option would mean channelling development beyond the Green Belt at the very south end of the Borough in land designated as Open Countryside. There are policy restrictions on this land, and there are a number of issues with this approach. Firstly, the distance from the urban area makes this an unsustainable location. Also there are limited services and facilities in this area of the Borough and very poor highway infrastructure. Lastly there are a number of multiple policy constraints such as SSSI designations, flood risk issues and Conservation Area issues which would make this option unviable.

*"85. When defining boundaries, local planning authorities should:*
- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*

*● where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
*● make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development"*

3.27 There can be consistency with the Local Plan to meet identified requirements for sustainable development and the need to define new boundaries. This can be achieved by allowing for a reasonably sized site or sites to accommodate growth; however it is important to note that this cannot be achieved solely through this Green Belt study, as the wider Green Belt Review across the local authority boundary looks to accommodate the full development requirements.

3.28 When undertaking this study, some logic can be applied to any conclusions to ensure that where is it unnecessary to include land within the Green Belt, that it can be excluded where it is justified.

3.29 Paragraph 85 point 3 of the NPPF refers to the possibility of the need for 'safeguarded land'. Referring back to PPG2 'Safeguarded Land' is considered to be the same designation as Area of Development Restraint which have been in existence within Redditch for a number of decades. The NPPF requires that this land is designated where it is required. At this stage there are no indications from the SHMA evidence that development needs cannot be met and there are no reasons to suspect that the quantum of development cannot be delivered within the Plan period. There is a reasonable prospect that regeneration opportunities created during this Plan period for implementation within the next Plan period suggest that it would not be necessary to make further designations of 'Safeguarded Land' or ADR during this Plan period.

3.30 The remaining ADR lands within Redditch are reviewed in detail through other local evidence.

*"110. In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment. Plans should allocate land with the least environmental or amenity value, where consistent with other policies in this Framework."*

3.31 This is a key part of the NPPF which can inform the detailed analysis of the sites.

*"112. Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality."*

3.32 The need to consider the economic effects of the best and most versatile agricultural land and the need to look for the poorer quality agricultural land in preference can be factored into the detailed analysis of the sites as part of this study.

*"152. Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued."*

3.33 There is emphasis in the NPPF on achieving all three aspects of economic, social and environmental sustainability in the development expressed through the Local Plan. The avoidance of significant adverse impacts is important, therefore this Green Belt review will be important in determining where there are more likely to be adverse impacts, particularly adverse environmental impacts. There would be an obvious social and economic consequence of not meeting assessed development needs particularly for the elderly.

*"157. Crucially, Local Plans should:*
*● plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*

*● be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;*
*● be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations;*
*● indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;*
*● allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;*
*● identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;*
*● identify land where development would be inappropriate, for instance because of its environmental or historic significance; and*
*● contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified."*

3.34 This paragraph broadly sets out the responsibility of the Local Authority, and what needs to be included within the Local Plan. Essentially a Plan detailing the deliverable development sites over the long term is required which can consist of specific designations (like the Strategic Sites) and broader locations if necessary.

*"179. Local planning authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in individual Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of this Framework."*

3.35 The wider Green Belt Review of the wider area will ensure that this aspect of the NPPF can be met by evidencing the best locations for development to meet the total growth figure. The Council will work closely with its neighbouring authorities when coming to the conclusion in this Redditch specific Green Belt study in the first instance.

## Regional Planning

3.36 On 6 July 2010 the Secretary of State for Communities and Local Government Eric Pickles announced the revocation of Regional Spatial Strategies with immediate effect. Following this announcement Cala Homes challenged the decision to revoke Regional Spatial Strategy's (RSS) on two procedural grounds:

- the abolition was an abuse of power, undermining the policy that there should be regional strategies in place; and
- the Secretary of State acted unlawfully by failing to undertake a Strategic Environmental Assessment to assess the environmental impacts of the revocation.

3.37 The court agreed with the claimant on both grounds and subsequently the government confirmed that the revocation of RSSs will be announced in the Localism Bill.

3.38 The Localism Act 2011 allows the Secretary of State to revoke saved Structure Plan policies and Regional Strategies and in May 2011 the Court of Appeal confirmed that planning authorities can take the intention to abolish Regional Strategies into consideration in deciding planning applications.

3.39 At the moment the level Regional Planning coverage in the West Midlands is formed only of the adopted Phase 1 Review (Black County). A Phase 2 Review commenced and reached the stage of having being examined and an Inspectors Panel Report issued in September 2009. A Phase 3 Revision was commenced but did not reach examination level.

3.40 With regard to the Phase 2 revision process on 12 March 2010 Lord McKenzie, Parliamentary Under Secretary of State Department for Communities and Local Government (CLG), wrote to the Chairman of the West Midlands Regional Assembly

advising that, following detailed consideration of the RSS process to date, CLG has decided that further work is required before the Secretary of State can publish his Proposed Changes. The Proposed changes never materialised and therefore cast some doubt over the Panel findings and very much left the Local Authorities in the West Midlands cautious of the provisions in the RSS Phase two Preferred Option and the Panel Report.

3.41 Despite this uncertainty there are a number of consistent policies from the RSS adopted version, the RSS Phase 2 Preferred Option and the Panel Report which the Borough Council considers to provide a useful context to this Green Belt Study and these are explained below.

## West Midlands Regional Spatial Strategy (January 2008)

*"2.7 In spatial terms, it is particularly the outward movement of people and jobs away from the MUAs which is increasingly recognised as an unsustainable trend and one which provides the Region with a key challenge."*

3.42 A risk was identified early in the RSS development that the Major Urban Areas (MUAs) were declining and that the spatial strategy had an opportunity to reverse this declining trend through its distribution. Although this aim of re-distribution is being lost with the RSS revocation, the principle seems to be holding steady in the West Midlands through the progression of individual development plans, however this would need to continue to be monitored.

*"3.4 In this context four major challenges are identified for the Region:*
*a) Urban Renaissance – developing the MUAs in such a way that they can increasingly meet their own economic and social needs in order to counter the unsustainable outward movement of people and jobs facilitated by previous strategies;*
*b) Rural Renaissance – addressing more effectively the major changes which are challenging the traditional roles of rural areas and the countryside"*

*"6.7 Outside the MUAs progressively lower levels of housing growth are proposed, so that they ultimately meet local needs and do not provide for continued out-migration. In locating development priority should be given to using previously developed land in sustainable locations in the other large settlements and sub-regional foci identified on the Spatial Strategy diagram."*

*"POLICY CF2: Housing beyond the Major Urban Areas:*
*C. Elsewhere the function of the other large settlements identified on the Spatial Strategy Diagram and the Region's market towns should not generally be to accommodate migration from the MUAs.*
*D. In rural areas, the provision of new housing should generally be restricted to meeting local housing needs and/or to support local services, with priority being given to the reuse of previously developed land and buildings within existing villages enhancing their character wherever possible."*

3.43 There are opportunities through the wider Green Belt Review, this Green Belt Study and through Local Plan production to recognise the need being expressed in the above paragraphs.

*"3.6 The Spatial Strategy can be broadly summarised as enabling all parts of the Region to sustainably meet their own needs, in a mutually supportive way."*

3.44 The concept of sustainably meeting an area's own development needs continues to be a relevant consideration in the development of the Local Plan, informed by the SHMA and is the most appropriate way in which the Borough Council should approach the task of meeting its development requirements.

*"3.11 …An important part of this is the development of a balanced network of town and city centres (PA11) that will act as the focus for major investment in retail, leisure and office developments. Broadly speaking this will mean:*
*c) other parts of the Region, particularly other main towns and villages, all building on their locational strengths, environmental qualities, regeneration opportunities and the linkages between them and with their local hinterlands to deliver improved local services and develop their own distinctive roles and character."*

3.45 The ability of Redditch as a settlement to continue to perform as centre which supports the wider area is a consideration through the Local Plan production.

*"3.14 The following strategic objectives provide a context for the policies in the topic Chapters:*
*d) to retain the Green Belt, but to allow an adjustment of boundaries where this is necessary to support urban regeneration;*
*e) to support the cities and towns of the Region to meet their local and sub-regional development needs;*
*f) to support the diversification and modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting needs and reducing social exclusion;*
*g) to ensure the quality of the environment is conserved and enhanced across all parts of the Region;"*

3.46 The first reference to the West Midlands RSS policy on the Green Belts comes in paragraph 3.14 and it is clear that given the broad concept of providing land to meeting local needs where it arises would have been likely to involve Green Belt boundary adjustment at this early stage, it is not surprising that the RSS approach made reference to it in criteria d. At this stage of the 2008 adopted RSS however, there was no specific mention of where a Green Belt boundary adjustment would be more likely to be necessary. Linked to criteria d is the concept in criterion e and f that the area should meet its development needs including for economic development. Balanced with this is the need to ensure that the quality of the environment is conserved and enhanced, in criteria g.

*"POLICY UR2: Towns and Cities Outside Major Urban Areas:*
*A. Local authorities and other agencies should seek to improve prospects in the following local regeneration areas by bringing forward local regeneration policies and programmes. Where possible access should be improved between concentrations of local deprivation and need within these towns and areas of economic opportunity, in line with policy T1. Any support for local regeneration programmes should not prejudice the need to focus resources within the MUAs."*

3.47 This Policy in the adopted RSS is relevant for this Green Belt Study because there could be opportunities for betterment within the areas of Green Belt which may be released for development, which adjoin deprived wards in the Borough.

"*POLICY UR4: Social Infrastructure:*
*A. … Local authorities should facilitate the co-ordination of land use and investment decisions of providers with improved service delivery to:*
*i) ensure that new social infrastructure is developed in or on the edge of an appropriate level of existing centre and is accessible by all modes by potential users;*
*ii) co-ordinate decisions on schools investment and the provision of new facilities with residential renewal;*
*iii) provide a range of educational facilities and services across all tiers to promote urban renaissance;*
*iv) facilitate the modernisation of local health services, informed by partnership working with Primary Care Trusts on local delivery plans and addressing inequalities in health;…*
*vi)…promote the provision of other facilities necessary for local communities and maximise the potential of existing community buildings and other facilities wherever there is the potential for mixed use;"*

3.48 A number of the criteria within this Policy are considered to be sensible considerations when looking to propose urban extensions through the Local Plan.

*"POLICY PA1: Prosperity for All:*
*C. Where growth opportunities are provided outside the MUAs, emphasis should be given to locating development where:*
*i) it can help meet the needs of the MUAs and promote positive economic linkages with them in areas accessible by sustainable forms of transport;*
*ii) it can help meet the needs of rural renaissance, especially of market towns;*
*iii) it can serve the needs of the local regeneration areas; and*
*iv) it can help create more sustainable communities by generally providing a better balance between housing and employment and limit the need for commuting.*
*D. Any development proposed on the edge of the MUAs or on other greenfield sites should meet the following criteria:*
*i) there are no suitable alternatives available on previously developed land and buildings within built up areas;*
*ii) the development should be capable of being served by rail or high quality public transport within easy access of centres and facilities; and*
*iii) the development respects the natural environment, built environment and historic heritage in accordance with policies QE1-9."*

3.49 Part C of this policy provides some relevant considerations which are able to be achieved on the proposed development sites. Part D serves as a useful check for the Authority to be certain that there the proposal for designation of a greenfield site would be the right one for this area. With regards to criteria i of this policy it has already been established in other evidence that there are no further suitable alternatives for Previously Developed Land in the urban area of Redditch. Considering criteria ii there is an opportunity for this to be

achieved, this will need to be considered in further detail. Criteria iii will also be relevant when undertaking detailed analysis of sites (in the Stage 2 assessments).

*"7.31 … It is important that accessible employment opportunities and attractive sites for developers are provided to support the urban renaissance and Spatial Strategy. Should there be insufficient sites on previously developed land of sufficient size, quality and location, to support the diversification and modernisation of the Region's economy, some greenfield development for employment purposes may be necessary."*

3.50 Even at an early stage of the RSS's development in the adopted 2008 version it was clear that in some areas that greenfield land was going to be required for economic development purposes in some parts of the region however the RSS was no specific about where this was likely to be required.

*"POLICY PA6: Portfolio of Employment Land:*
*A. Local authorities, AWM, local economic partnerships and other agencies should aim to provide and maintain a range and choice of readily available employment sites to meet the needs of the Regional economy…*
*B. In undertaking this task, local authorities, in conjunction with AWM, should identify:*
*iii) the potential for the maximum use of recycled land for employment purposes to meet these needs but to recognise that the use of some greenfield land will be required, albeit as a last resort;*
*iv) that in all cases land allocations should take account of the need to protect and enhance the Region's natural, built and historic environment"*

3.51 Similarly to previous comments, this policy requires that the employment needs that are predicted to be generated within the Plan period must be provided and maintained in the Plan, with an emphasis on finding recycled land for employment purposes. Again at this early stage criteria iii of Part B of the Policy recognises that some greenfield land would be required for this purpose but the RSS was not specific about when and where this would be justified.

*"POLICY PA11: The Network of Town and City Centres:*
*A. A network of strategic town and city centres will be developed across the Region as set out below: …Redditch…"*

3.52 The Town Centre of Redditch was identified as being of strategic importance to the town and wider area. The growth levels are therefore important considerations when looking to maintain or enhance the role of Redditch Town Centre. The direction and location of growth will also be important factors to ensure that the Town role is maintained.

*"POLICY QE1: Conserving and Enhancing the Environment*
*B. Local authorities and other agencies in their plans, policies and proposals should:*
*ii) conserve and enhance those areas of the Region, where exceptional qualities should be reinforced by sustainable use and management…*
*iii) protect and where possible enhance other irreplaceable assets and those of a limited or declining quantity, which are of fundamental importance to the Region's overall environmental quality, such as specific wildlife habitats (Annex B), historic landscape features and built heritage, river environments and groundwater aquifers;*
*iv) protect and enhance the distinctive character of different parts of the Region as recognised by the natural and character areas (Figure 4) and associated local landscape character assessments, and through historic landscape characterisation."*

3.53 This policy provides a regionally significant overview of some of the important aspects of the environment which would need to be considered through the detailed analysis in this study.

*"8.7 Certain environmental assets in the wider landscape, including features of historic value and particular habitats of nature conservation interest, cannot be replaced. Their protection should have a high priority. However, where there are over-riding social or economic reasons for development, some reduction of less sensitive assets may be justified providing wherever possible appropriate measures are taken to mitigate and/or compensate for the loss."*

3.54 Paragraph 8.7 is very similar to some of the provisions in the NPPF because there is a high priority given to environmental designation protection, however if there are other social or economic justifications weighing in favour of development, some of the more minor designations may be reduced or lost where it is possible to mitigate that loss.

*"POLICY QE3: Creating a high quality built environment for all:*
*B. Particular attention should be given to:*

*i) securing a high quality of townscape, urban form, building design and urban spaces, through the use of architecture, urban design and landscape design, which respects Regional and local character, culture and history"*

3.55 With regard to the above criteria in Policy QE3 it is possible to consider the need to secure a high quality townscape and urban form as part of the exercise of looking at the impact of Green Belt release. The topography around Redditch is particularly sensitive to change given its interrelationship with the wider open countryside and its conspicuousness from many parts of the Town.

*"POLICY QE4: Greenery, Urban Greenspace and Public Spaces:*
*A. Local authorities and other agencies should undertake assessments of local need and audits of provision, and develop appropriate strategies for greenspace to ensure that there is adequate provision of accessible, high quality urban greenspace with an emphasis on:*
*ii) enhancing the setting of local residential neighbourhoods in built up areas;*
*iii) increasing the overall stock of urban trees;*
*v) maintaining and enhancing sports, playing fields and recreation grounds.*
*B. Development plan policies should create and enhance urban greenspace networks by:*
*i) ensuring adequate protection is given to key features such as parks, footpaths and cycleways, river valleys, canals and open spaces;*
*ii) identifying the areas where new physical linkages between these areas need to be forged; and*
*iii) linking new urban greenspace to the wider countryside to encourage the spread of species."*

3.56 It has already been established in previous local evidence that open space is a very important matter for Redditch. This RSS Policy therefore provides a very useful broad overview of the importance of adequate provision of accessible and high quality spaces. Criteria ii is an important criteria to consider because the Strategic Site areas being considered through the Local Plan are located adjacent to residential neighbourhoods, so there is a need to make sure that the setting of those areas is enhanced when considering the layout and design of the Strategic Sites, the release of parcels of the sites will therefore be an important contributing factor. Criteria iii regarding tree stocking is reflected in local emerging policy, and given the dispersed woodlands in the vicinity of the Strategic Site this will be an important criteria to consider, especially when concluding on enhancements to Green Belt boundaries. Criteria v refers to the maintenance of open space which will be a consideration given that there are existing open space designations within Strategic Site boundaries.

3.57 Part B of this Policy focuses on the creation and enhancement of green space and this is achieved through protection and identification in plans where new green links can be found and where links to the open countryside can be fostered. This will be a critical consideration and something which must be achieved through these Strategic Site designations because it is a distinctive feature of Redditch urban area.

*"POLICY QE5: Protection and enhancement of the Historic Environment:*
*A. Development plans and other strategies should identify, protect, conserve and enhance the Region's diverse historic environment and manage change in such a way that respects local character and distinctiveness.*
*B. Of particular historic significance to the West Midlands are:*
*i) the historic rural landscapes and their settlement patterns;*
*ii) historic urban settlements, including market towns and cathedral cities;*
*iii) listed buildings, scheduled and unscheduled ancient monuments, conservation areas, historic parks and gardens, all in their settings, and battlefields;*
*iv) areas of industrial heritage such as the Birmingham Jewellery Quarter;*
*v) the historic transport network;*
*vi) strategic river corridors (Severn, Wye, Trent, and Avon); and*
*vii) Ironbridge Gorge World Heritage Site."*

3.58 Preserving the historic significance of the town is one of the Green Belt purposes set out in the NPPF. This policy is therefore relevant for consideration as part of the study as it guides the plan to protect, conserve and enhance where it is relevant. Also because there are historically significant designations in close proximity to the proposed Strategic Site areas this policy will be relevant context.

*"POLICY QE6: The conservation, enhancement and restoration of the Region's landscape:*
*Local authorities and other agencies, in their plans, policies and proposals should conserve, enhance and, where necessary, restore the quality, diversity and distinctiveness of landscape character throughout the Region's urban and rural areas by:*
*i) ensuring that a consistent approach is taken to landscape and character issues, particularly where they cross local planning authority boundaries;*
*ii) establishing a positive and integrated approach to the use, management and enhancement of the urban fringe;*
*iv) protecting and, where possible, enhancing natural, man-made and historic features that contribute to the character of the landscape and townscape, and local distinctiveness"*

3.59 Landscape character will be an important consideration when undertaking the detailed analysis of the study and it also factors into some of the decision making about whether or not a parcel of land would contribute towards the purpose of its Green Belt designation.

*"POLICY QE7: Protecting, managing and enhancing the Region's Biodiversity and Nature Conservation Resources:*
*All the plans and programmes of local authorities and other relevant agencies should:*
*i) encourage the maintenance and enhancement of the Region's wider biodiversity resources, giving priority to:*
*• the protection and enhancement of specific species and habitats of international, national and subregional importance…*
*• those that receive statutory protection; and*
*• the biodiversity enhancement areas shown on the QE Areas of Enhancement Diagram.*

3.60 Policy QE7 sets out that the conservation of biodiversity should be ensured in developing the plan. This places emphasis on three types of biodiversity resource. The first are specific species and habitats of international, national and sub-regional importance which can be determined through the Worcestershire BAP and the West Midlands Biodiversity Audit. The second type is areas receiving statutory protection which can be picked up under constraints analysis as part of this study. The third type are identified biodiversity enhancement areas, and one of these area is identified adjacent to Redditch Borough's western boundary, so its consideration will need to be factored into the detailed analysis within this study.

*"POLICY QE8: Forestry and Woodlands:*
*A. Development plans, other strategies and programmes should encourage tree cover in the Region to be increased, where it is appropriate to the character of the area, taking account of the Regional Forestry Framework, and in ways that reinforce and support the Spatial Strategy by:*
*i) designing new planting and woodland expansion so as to maintain and enhance the diversity and local distinctiveness of landscape character within the Region, ensuring that new planting does not adversely impact on the biodiversity of a site;*
*ii) replacing woodland unavoidably lost to development with equivalent areas of new woodland preferably in the same landscape unit;*
*iii) realising the potential for creating larger multi-purpose woodlands, woodlands along transport corridors and reducing fragmentation of ancient woodlands…*
*B. Development plans and other strategies should seek to conserve and protect woodlands, especially ancient and semi-natural woodlands, by:*
*i) prohibiting the conversion of semi-natural woodland (as defined in the UK Forestry Standard Notes) to other land uses unless there are over-riding conservation benefits;*
*ii) increasing the protection of ancient woodland sites or ancient semi-natural woodland through consultation with the Forestry Commission over any planned application within 500m; and*
*iii) exercising a general presumption against the conversion of any woodland to other land uses unless there are overriding public benefits."*

3.61 Given the location of the Strategic Sites and the known woodlands around the wider area this Policy will be an important one to factor into the detailed analysis within this Study. The character of the area will require the consideration of new planting which can link into the aim of criteria i aiming for the creation and enhancement of strong Green Belt boundaries. The policy makes it clear that woodland (except semi-natural woodland, ancient semi-natural woodland or ancient woodland) is not an absolute constraint to development and there should be opportunities to enhance woodlands which would be a relevant consideration for this study.

*"POLICY QE9: The Water Environment:*
*A. Development plan policies and plans of the Environment Agency and other agencies should be coordinated, where necessary across local authority and Regional boundaries, to:*
*i) protect or improve water quality and where necessary significantly reduce the risk of pollution especially to vulnerable surface and groundwater in order to improve health and well-being;*

*ii) manage demand, conserve supply, promote local recycling of water and the multiple use of water resources;*
*iii) protect and enhance wetland species and habitats, particularly those subject to local biodiversity partnerships;*
*iv) ensure that abstraction from watercourses and aquifers does not exceed sustainable levels;*
*vi) ensure the timing and location of development respects potential economic and environmental constraints on water resources; and*
*vii) maintain and enhance river and inland waterway corridors as key strategic resources, particularly helping to secure the wider regional aims of regeneration, tourism and the conservation of the natural, built and historic environment."*

3.62 There are a number of relevant criteria noted in the Policy above which should be considered as part of the more detailed analysis within this Study and as part of Local Plan preparation as a whole. A Local level Strategic Flood Risk Assessment (Level 1 and 2) and Water Cycle Study (Outline) have been completed which considers the water environment within Redditch and the surrounding environment.

*"POLICY T1: Developing accessibility and mobility within the Region to support the Spatial Strategy:*
*A. Access within and across the Region will be improved in a way that supports the RPG's Spatial Strategy, reduces the need for travel, expands travel choice, tackles congestion, improves safety and protects the environment.*
*B. This will be achieved by:*
*ii) measures to improve accessibility and mobility in other urban areas, market towns and rural areas so that more sustainable means of travel are encouraged and local regeneration initiatives are supported;*
*iii) measures to improve national road and rail networks to ensure that strategic links to external markets are maintained and the Region does not become a transport bottleneck undermining national economic growth"*

3.63 Policy T1 is a general policy which sets out the ways in which transport can support the regional strategy. Accessibility and mobility within urban areas is the focus of criteria ii and this is also reflected in emerging local policy.

*"POLICY T2: Reducing the need to travel:*
*Local authorities, developers and other agencies should work together to reduce the need to travel, especially by car, and to reduce the length of journeys through:*
*i) encouraging those developments which generate significant travel demands to be located where their accessibility by public transport, walking and cycling is maximised, including close to rail and bus stations…*
*ii) promoting patterns of development which reduce the need for travel …*
*v) supporting the retention and enhancement of local service provision, especially where public transport provision is poor."*

3.64 Policy T2 focuses on reducing the need to travel which is also a theme within the emerging Local Plan No.4. There are important considerations here like locating development where they are likely to be more accessible to sustainable transport modes and where it would be likely to enhance existing local service provision which could include bus services. These will be important to consider in the more detailed analysis within this Green Belt Study.

## West Midlands Regional Spatial Strategy – Phase Two Revision Preferred Option (December 2007)

*"2.22 Sustainable communities can only be created and maintained if they contribute to environmental, social and economic objectives. New development can create durable places where people want to live and will continue to want to live. This means the delivery of sustainable communities that are designed and planned at an appropriate size, scale, density and mix. Each location needs to be chosen to be accessible to a range of employment, and to be large enough to support essential services, including decentralised energy infrastructure, cultural opportunities, a network of green infrastructure to promote healthy living, and a good public transport network which is linked to other nearby towns."*

3.65 Paragraph 22 proposes that a number of considerations about the size, scale and type of development will be important to ensure that sustainable communities are created. Alongside this the existing infrastructure provision in an area should influence the decision about location. These considerations have always been factored into the Council's proposals for development will be an important consideration when looking at the wider Green Belt Review.

*"2.24…Sustainable communities should also create a sense of place, by safeguarding and enhancing the distinctive character and qualities of existing towns. Plans, strategies and programmes must consider the potential impact of new development and increased traffic levels on European nature conservation sites and adopt measures to minimise these impacts."*

3.66 The essence of a sustainable community is presented in this paragraph as somewhere that enhances the distinctive character of the Town.

"**Policy SR2 Creating Sustainable Communities:**
*…A. to provide for the planned levels of new housing, with sufficient population to achieve a well integrated mix of homes and inclusive communities, and to meet people's housing needs throughout their lives, including the provision of affordable housing*
*B. for new employment generating activities to meet the needs of the existing population and any population arising from new housing development, and to create wealth within the community*
*C. to create attractive, well-designed, adaptable, safe and secure developments, which have a sense of place, that respond to the distinctive features of the site, integrate with their surrounding context, respect and enhance local character, and maximise the reuse of buildings and brownfield land*
*D. for necessary services and social infrastructure to meet the needs of the population, including health, education and skills, spiritual, sport and recreation, and cultural facilities, and the requirements of the emergency services*
*E. for a comprehensive green infrastructure network that provides the full range of environmental services, including mitigation and adaptation to a changing climate, accessible greenspace for walking and cycling, sport and recreation, health and wellbeing and protects, consolidates and enhances biodiversity and geodiversity, especially the Region's European sites, and its historic assets and landscape character*
*F. to provide the necessary public transport infrastructure so as to improve accessibility to employment, services and facilities both within and between settlements, particularly for the least affluent members of society, and give priority to the most low carbon forms of transport, such as walking and cycling, and reducing the need to travel by car, thus minimising the generation of transport-related emissions and the adverse effects associated with such emissions*
*G. to provide the environmental infrastructure needed to support new development, such as larger scale renewable and decentralised energy generation, including combined heat and power, and community heating systems, sewerage infrastructure, sewage treatment works, sustainable drainage systems, water treatment, reuse and recycling of waste, resource recovery facilities and soft and hard infrastructure needed for flood risk management.*

3.67 This policy describes some of the essential characteristics of a sustainable community and will feature in the development of allocated sites.

"**Spatial Strategy Objectives:**
*3.9* The following strategic objectives provide a context for the policies in the topic Chapters:
…d) to retain the Greenbelt but to allow an adjustment of boundaries, where *exceptional circumstances can be demonstrated, either* to support urban regeneration *or to allow for the most sustainable form of development to deliver the specific housing proposals referred to within the sub-regional implications of the strategy."*

3.68 This Spatial Strategy Objective was amended from the adopted RSS to the Preferred Option RSS to include reference to Green Belt boundary adjustments where exceptional circumstances can be demonstrated. It was also expanded to make it clear that boundary changes are necessary where this would represent the most sustainable form of development to deliver the required housing. It is considered that these exception circumstances have always applied at Redditch throughout the RSS preparation.

***"Worcestershire:***
*3.60 Worcestershire shares with South Warwickshire the same key sub-regional housing market characteristics of high prices, high demand and acute affordability problems and is part of the South subregional housing market area. As with Staffordshire, Worcestershire has experienced significant economic change and the towns of Kidderminster, Redditch and Worcester have been identified as Local Regeneration Areas where the aim is to improve their longer term economic prospects.*

*3.61 In the past, the North of the County (e.g. Redditch, Bromsgrove, Droitwich) saw rapid residential growth as a result of planning policy directing migration (i.e. 'overspill') from the Birmingham/Black Country conurbation. However, the current WMRSS has adopted a fundamental change in policy direction where the central aim is for the MUAs, wherever possible, to meet their own economic and social needs within their own boundaries and to limit migration to overspill locations."*

3.69 The specific section in the RSS referring to Worcestershire makes it clear how the WMRSS proposals would impact on the area. In relation to Redditch paragraph 3.60 referred to the Town as a Local Regeneration Area. This designation has always aligned with the aim of the Borough presented in the previous Core Strategy designations. Paragraph 3.61 refers to a history of overspill, migration does impact on Redditch particularly from Birmingham and Solihull. The aim of the RSS for MUAs to meet their own economic and social needs relieves some of the impacts felt on shire areas like Redditch, however with the prospect of this RSS being lost; there could be a risk of a policy reversal. The fact that Redditch cannot meet its own needs within its

boundaries will mean that the impacts on the Redditch plan and this Green Belt study is minimal, because there are no mechanisms for dealing with any impacts from potential MUA growth without cross boundary mechanisms.

*"3.65 Outside of Worcester, further development in the County will be focused within other larger settlements and market towns acting as strategic locations for housing as well employment growth. In the case of Redditch, the town is designated as a WMRSS Settlement of Significant Development given the scale of housing required to meet its needs (i.e. reflecting the population structure of this previous New Town). With limited development capacity within the town itself, this will require extensions to the urban area, including provision in adjoining Districts (CF3) with implications for Greenbelt. This will require close liaison between authorities in the preparation of their Core Strategies. Any greenfield extensions will also need to be appropriately managed and phased, to ensure new housing provision does not encourage migration from Birmingham and the Black Country."*

3.70 Paragraph 3.65 refers to other large settlements in Worcestershire. At the point of Preferred Option the RSS proposed Redditch as a Settlement of Significant Development which the Borough Council contested as a flawed designation, and later the policy was recommended to be changed through the Panel, so Redditch functions as any other larger settlement. The paragraph acknowledged that there is limited development capacity within the town and that extension into neighbouring authority areas would be necessary.

**"CF3 Level and Distribution of New Housing Development:**
*A. Development plans should make provision for additional dwellings (net) to be built as specified in Table 1 for the period 2006- 2026…In certain circumstances, the most sustainable form of housing development may be adjacent to the settlement but cross local authority boundaries. Where housing market areas cross local authority administrative boundaries, co-operation and joint working will be necessary to ensure that sites are released in a way that supports sustainable development. In the following locations, local authorities must jointly consider the most appropriate locations for development before producing or revising LDDs:*
*...ix) Redditch, Bromsgrove and Stratford-upon-Avon in relation to Redditch…*
*Footnotes to accompany Table 1: e) Redditch Figure of 6,600 includes 3,300 in Redditch and 3,300 adjacent to Redditch town in Bromsgrove and/or Stratford-upon-Avon Districts."*

3.71 Policy CF3 was a re-written policy for the RSS Preferred Option which again refers to some circumstances where the most sustainable form of new housing allocation would be development adjacent to settlements across Local Authority boundaries. Redditch is specifically mentioned within this Policy to jointly consider the most appropriate locations for development with Bromsgrove and Stratford on Avon Districts, and a housing requirement was set which recommended that about half of the housing must be found on locations across the authority's boundary. Since this time the data behind the housing requirements has changed, so has the Plan period, however the concept of requiring cross boundary development to provide a significant amount of the development remains valid.

"**CF4 Phasing of new development:**
**…** *In the preparation and review of LDDs and in determining planning applications, local authorities should use the following criteria to govern the allocation and phasing of land release at local level:*
*E. The development of any greenbelt sites should generally be phased late in the plan period and after further investigation as to whether they constitute the most sustainable form of development in the local area and represent exceptional circumstances and*
*F. Local authorities in allocating and phasing sites in LDDs should not undermine urban renaissance within the authority or in neighbouring areas."*

3.72 This was another re-written policy included within the Preferred Option RSS and the two relevant criteria to consider for this study relate to phasing of Green Belt land. The Policy recommended that any proposal for development on Green Belt sites should generally be phased late in the plan period. Because Redditch Borough Council has such a significant reliance on Green Belt land to meet its requirements any phasing has been viewed to be potentially economically and socially damaging. This reliance means that the right location must be carefully considered so that it's going to be sustainable, and so that the Council's proposal for urban renaissance within the authority is not undermined.

**"CF10 Managing housing land supply:**
*B. Development plans should incorporate policies which:*
*i) Allow for the managed release of new housing land, so as to secure the development of brownfield land and conversions, as a priority, taking account of the need for any new infrastructure and ground preparation*

*ii) Take account of potential housing land provision and the policy framework in adjoining local authority areas so as not to undermine urban renaissance in other local authority area"*

3.73 Policy CF10 was another re-written policy within the RSS Preferred Option. The relevant part of this Policy to the Green Belt study is section B which includes some considerations about considering effects upon infrastructure and the development strategy in neighbouring areas.

**"Policy PA6A Employment Land Provision**
*… There are a small number of circumstances where employment land provision might need to be made in an adjoining authority's area. Such circumstances are identified in the table and the relevant authorities will be required to hold cross-boundary discussions throughout the preparation of Core Strategies to ensure that such requirements are satisfactorily met. In some areas existing commitments significantly exceed likely future employment land needs. To address this issue the relevant Local Planning Authorities must carefully reconsider land allocations and the appropriateness of renewing extant planning permissions. In preparing their development plans,* local authorities, in conjunction with AWM, should *take account of:*
i) *the needs of* existing businesses and take account of the needs of inward investors
ii) *the need to ensure that employment opportunities are accessible to areas of significant new housing development*
iv) the potential for the maximum use of recycled land for employment purposes to meet these needs but to recognise that the use of some greenfield land *may* be required *where all other alternatives have been considered*
v) that in all cases land allocations should take account of the need to protect and enhance the Region's natural, built and historic environment
viii) the extent to which office developments should be restricted on certain sites (in accordance with PA11)."

3.74 Policy PA6A is based upon an existing policy in the adopted RSS but it underwent a substantial re-write in the Preferred Option RSS. The policy refers to the fact that there will be circumstances where Local Authorities will require cross boundary identification of land to meet employment requirements in the same way that housing may be justified in an adjoining authority.

## West Midlands Regional Spatial Strategy – Phase Two Review Panel Report (September 2009)

3.75 The passage below includes relevant recommendations from the Panel Report. Where there are direct references to policy changes from the Panel Report, the extract provides the original submitted policy alongside the Panel's changes to that policy indicated in bold, italics, underline and strikethrough.

*"vii. While we endorse the strategy and the overall approach of the Phase 2 revision, our recommendations do make some changes. Principally these are to remove Redditch from the list of SSDs and to tighten the policy towards Green Belt by specifying more clearly those locations in which the RSS supports boundary changes."*

3.76 As noted earlier in this study the Panel agreed that Redditch's role is not the same as others proposed as SSD so this proposals was recommended to be changed from the Preferred Option RSS. This paragraph also explains that in some places it can be more specific about where Green Belt boundary changes will be necessary.

*"2.52. In the light of WMRA's assertions about not revising the spatial strategy, it is perhaps surprising that the Preferred Option document contains an extensively re-written Chapter 3 on the Spatial Strategy, including some changes to the Objectives in paragraph 3.9 relating to Green Belt boundary adjustments in order to allow for the most sustainable form of development…We conclude there that Green Belt boundary changes will be required in a limited number of situations and may be appropriate in some others, in order to provide for the most sustainable form of development to meet housing needs. However a key conclusion that we come to is that those situations should be specified in the RSS and that the general provision allowing for boundary changes indicated by supporting paragraph 6.25 should be removed. The revised objective at 3.9(d) needs to be amended to reflect this rather less open-ended approach to Green Belt boundary changes. This is covered in our recommendation R8.2."*

3.77 This recommendation within the Panel Report is of great importance as context to the Green Belt study, because this recommendation specifies that the Panel recognises that there is no option but to recommend specifically that this Borough will require Green Belt boundary changes. Since the Panels recommendation there have been no changes or new evidence to suggest that this would not continue to be the case.

*"2.63. The question we have to answer is whether all the 10 so identified can be said to meet the specified general criteria, including the towns identified within the bespoke CSW sub-regional strategy. Worcestershire County Council, Redditch Borough itself, Bromsgrove District Council (the Authorities) and a number of other respondents all opposed the designation of Redditch as a SSD. This is addressed more fully in Chapter 8, but the gist of their arguments is that as Redditch will not be meeting more than its own local development needs and can only meet these by cross-border developments within neighbouring authorities it should not be given a designation that implies an expectation of meeting development needs of a wider area. Given that it is relatively close to the MUA as a former crescent New Town, the designation could be seen as having connotations of continued migration contrary to the spatial strategy imperative of securing urban renaissance within the MUAs. We found this argument to be of compelling logic. Accordingly Redditch is omitted from the list of SSDs in our recommendation R2.10."*

3.78 The first part of paragraph 2.63 again refers to the resistance to Redditch being designated as SSD which is less important as context to this Green Belt Study; However the remaining part of this paragraph is important when considering changes since the RSS's proposed departure as there would be wide-scale implications for the Borough and neighbouring Authorities should there be changes in the way in which surrounding MUAs plan their growth, not least because it is evidenced that the Panel showed concern about the Borough's capability of planning for growth over an above the areas own generated development needs.

"**Amend Policy SR2 Creating *and Maintaining* Sustainable Communities:**
*…A. to provide for the planned levels of new housing, ~~with sufficient population~~ to achieve a well integrated mix of homes and inclusive communities, and to meet people's housing needs throughout their lives, including the provision of affordable housing*
*B. for new employment generating activities to meet the needs of the existing population and any population arising from new housing development, and to create wealth within the community*

*C. to create attractive, well-designed, adaptable, safe and secure developments, which have a sense of place, that respond to the distinctive features of the site, integrate with their surrounding context, respect and enhance local character* ***heritage and biodiversity,*** *and maximise the reuse of buildings and brownfield land*
***D. to adapt, enhance and where appropriate regenerate existing communities to achieve the same standards of sustainability as in new development, maximising the beneficial use of existing developed land and buildings and maintaining the historic fabric, and promoting behavioural change to ensure sustainable communities***
***E****. for necessary services and social infrastructure to meet the needs of the population, including health, education and skills, spiritual, sport and recreation, and cultural facilities, and the requirements of the emergency services*
***F****. for a comprehensive green infrastructure network that provides the full range of environmental services, including mitigation and adaptation to a changing climate, accessible greenspace for walking and cycling, sport and recreation, health and wellbeing and protects, consolidates and enhances biodiversity and geodiversity, especially the Region's European sites, and its historic assets and landscape character*
***G****. to provide the necessary public transport infrastructure so as to improve accessibility to employment, services and facilities both within and between settlements, particularly for the least affluent members of society, and give priority to the most low carbon forms of transport, such as walking and cycling, and reducing the need to travel by car, thus minimising the generation of transport-related emissions and the adverse effects associated with such emissions*
***H****. to provide the environmental infrastructure needed to support new development, such as larger scale renewable and decentralised energy generation, including combined heat and power, and community heating systems, sewerage infrastructure, sewage treatment works, sustainable drainage systems, water treatment, reuse and recycling of waste, resource recovery facilities and soft and hard infrastructure needed for flood risk management."*

3.79 The changes to the policy suggested by the Panel should be taken into account because the criteria offer some detailed considerations which can be applied allocating land through the Local Plan process.

***"****Table 3.3 – Housing Proposals 2006-2026 Footnote 5 - Around 4,000 within the Borough and around 3,000 in Bromsgrove District adjacent to the Redditch boundary."*

3.80 The extract from the Panel Report above reflects the Panel's thinking about the split of requirements with around 4000 dwellings recommended for Redditch and 3000 adjacent to Redditch in Bromsgrove District. Although the number of dwellings required has been updated since this time, the concept of this split allocation remains valid and this will be a consideration in further work on the wider Green Belt Review.

***"****R3.2 Revise the supporting text on the following lines:*
*4.17. … In our view it is appropriate, and indeed necessary, for the RSS to set out its priorities for regeneration and urban renaissance, and rural renaissance, as key factors that should influence the allocation and delivery of land for housing development. But that is not to say that those priorities should be set above the need to secure delivery of the region's housing requirement…Alongside PDL, however, greenfield allocations will have a role in some places, particularly where the supply of PDL is limited, or where new sites are the most appropriate option to meet the particular range or type of housing required, or for sustainable location of development. Even land released from the Green Belt may be appropriate to bring forward at an early stage in some locations in order to facilitate wider objectives, including sustainable development.*

3.81 This paragraph explains that the priority according to the Panel is the delivery of the housing requirements for the region and that this should be prioritised above the needs to delivery the RSS's other priorities. As is the case in Redditch, it will not be possible to demonstrate short term delivery of sites without Green Belt release.

*"4.18. … It is appropriate in our view for the RSS to seek to ensure that urban PDL is developed as a priority and that less sustainable options including greenfield sites should not be brought forward ahead of need. The latter consideration also applies to sites identified for release from the Green Belt. However, this needs to be set in the context of ensuring a 5-year supply, and identifying 10-year provision to meet the requirements of Policy CF3. As we have noted elsewhere, although greenfield sites may be thought easier to develop, they may still require long lead times - up to 10 years, which means that they need to be identified and committed at a suitably early stage.*

*R4.1 Replace Policy CF4 and CF10 (which should be deleted) with a new policy to read as follows:*

***CF4 Phasing and managing land for housing:***
*…In maintaining a 5 year supply and at least 10 year provision of sites Local Planning Authorities should bring forward sites for development having regard to the guidance in PPS3 and to the following criteria:*
*A. The need to maintain and accelerate the progress of urban renaissance, as well as to achieve the delivery of additional housing under Policy CF3.*
*B. Priority for the re-use and development of previously developed land in sustainable locations.*
*C. Avoiding the use of greenfield sites (including land released from the Green Belt pursuant to the policies of the RSS) ahead of need, having regard to the availability of other land, but also to the lead times involved in bringing sites forward for development."*

3.82 This recommended change explained in paragraph 4.18 and actioned through new policy CF.4, for clarity was suggested by the Panel report is an important consideration because it justifies the early phasing that will be necessary in a place like Redditch even on areas currently designated as Green Belt.

*"Revise the supporting text, paragraphs 6.30 to 6.35 to include the following points:*
*… 4. Greenfield sites, including land released from the Green Belt, are likely to need to be brought forward in some locations at an early date to complement the availability of previously developed sites in achieving the levels of housing increase sought. The programming and location of such sites, particularly in or adjacent to the MUAs, may need to be carefully managed so as to avoid undermining the delivery of viable urban sites close by (including those in a neighbouring authority's area)."*

3.83 This paragraph supplement the Panel's revised Policy CF.4 and explains that delivery in the short term may be required in some areas to ensure the levels of housing requirements can be met and Redditch is one such case. Another consideration however is the impact of that course of action on areas within the MUAs and how that can be managed. There is little that can be analysed as part of this study however, because it is related to the Redditch Green Belt areas only, which are relatively small in scale and not likely to have impacts on the MUA.

*"5.10 …. The rolling 5 year reservoir approach will help to ensure that land is not brought forward ahead of need and in the absence of an employment land equivalent of paragraph 6.25 (which in any case we recommend should be deleted) any proposal to take additional land out of the Green Belt, other than in the specific cases in the Spatial Strategy policies which we recommend, would need to comply with the strict requirements of PPG2."*

3.84 Due to the severe lack of sites within Redditch it is necessary to look to the Green Belt to meet development needs, in order for Redditch to meet housing and employment requirements. In this particular circumstance due to the shortage of land it is difficult to control a reservoir of land for development without first identifying appropriate sites that development could be delivered upon.

*"R5.7 Re-locate the footnotes to Table 4 from page 97 so that they immediately follow the table amending them as follows:* ***…(g) Of which at least 12 ha will be provided within Stratford-on-Avon District west of the A435 and the balance remaining out of a total of up to 37 ha will be provided in Bromsgrove District at a location or locations to be agreed in the Core Strategies for Redditch and Bromsgrove Districts."***

3.85 The extract from the Panel Report above reflects the Panel's thinking about the split of requirements for employment development with around 12Ha recommended for adjacent to Redditch in Stratford on Avon District and the balance up to 37Ha in Bromsgrove District. Although the requirements for employment land has been updated since this time, the concept of this split allocation remains valid and this will be a consideration in further work on the wider Green Belt Review. There are other local considerations to take into account on sites such as the work completed on bringing forward the 12Ha site adjacent to Redditch in Stratford District.

*"8.77. In relation to Redditch, it was universally recognised that the Borough does not have sufficient development land within its boundary to meet locally generated needs for either housing or employment given the particular characteristics of its population as a former new town. As a consequence and also because of its location relatively close to the MUA where migration might be expected to be encouraged from availability of new development contrary to the urban renaissance strategy, the provision is intended to be purely to meet these locally generated needs rather than the wider needs of the region."*

3.86 This paragraph is the first within section 8 of the report which comes to some specific recommendations about Redditch. There is recognition of the capacity issues which are evidenced in other parts of the Redditch evidence base and a warning to consider about the effects of growth on nearby MUAs.

*"8.78. As for the provision level itself, the RSS Preferred Option proposes 6,600 dwellings for Redditch. This accords closely to the 6,900 need figure calculated by CCHPR and above the NHPAU suggested figure of 6,000 for distribution of their upper range. Roger Tym on behalf of Gallagher Estates argued for a higher figure based on calculations related to employment. Given the constraints imposed by the local authority boundary we did not consider it to be appropriate to pursue consideration of larger housing allocations and the local travel to work area clearly overlaps with that of the MUA. The Preferred Option suggests splitting the provision figure half within Redditch with the remainder in Bromsgrove District and/or Stratford-on-Avon District on a basis to be agreed, with Green Belt review being required*

*to facilitate this development. A portion of the employment land requirement is also proposed to be subject of cross-boundary provision."*

3.87 This paragraph suggests a number of varied proposals for Redditch's housing requirements, and despite there being changes to the data on Redditch's housing requirements the new provision is broadly in line with the RSS's proposals. The Panel does express concerns within this paragraph about the ability of the Borough and surrounding area to accommodate more that its development requirements and the potential affects of this given the travel to work area. Although not a great concern in this Green Belt study this may be relevant when considering the wider Green Belt areas implications.

*"8.79 … A consultant study commissioned by the authorities from White Young Green (WYG) that was intended to resolve the distribution has not done so. Although the Stage 1 study (CD167) was agreed, the Stage 2 study (653/1) has led to even greater differences between the Districts.*

*8.80. It was stressed at the EiP that the authorities and GOWM wanted the Panel to give clear direction on the distribution of the development for Redditch, albeit that Bromsgrove District wished to retain flexibility as to where the provision should be made on the edge of Redditch for whatever level of provision may be determined. In view of the controversy, we paid greater attention to the potential development areas in and around Redditch on our tours of the region than to any other locality. We viewed all the significant ADRs within the Borough and also looked at the Green Belt fringes within Stratford-on-Avon District and not just those within Bromsgrove District. We can understand the case advanced in the WYG study that it would perhaps be easiest to develop a single major urban extension in infrastructure terms, essentially as proposed at Bordesley Park, rather than pursuing a number of urban extensions and that there might be flexibility to add additional provision for Birmingham as suggested by NLP. However, we rejected the approach of making additional provision for Birmingham in Bromsgrove District when considering the central core of the conurbation in order to maintain the principles of the urban renaissance Strategy. It would be perverse to make such provision on the edge of Redditch as that would entail longer distance commuting. Moreover, a greater flexibility in terms of achieving and maintaining housing output could be argued to be provided through parallel pursuit of a number of developments."*

*"8.82. In landscape terms we can appreciate that when looking north from Redditch the greater part of the Bordesley Park area would be contained within ridge lines while some of the areas in and adjacent to ADRs would be on or close to ridge lines. However, the situation is not as clear-cut as that as, from some view points nearer to Alvechurch, parts of the suggested Bordesley Park land would be in clear view and, conversely, there are some areas of ADR and adjacent land that appear well contained in landscape terms. Moreover, although summarily rejected in the WYG Study on grounds of coalescence, we consider that development between Redditch and Studley might have the least impact on rural character. The summary rejection of that land sat in somewhat strange contrast to the recommended lessening of the arguably more significant gap towards Alvechurch in relation to the purposes of the West Midlands Green Belt in containing the West Midlands conurbation. 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. We agree, however, that it would be prudent not to rely on density assumptions that might not be able to be realised and, in line with Policy PA6B, to assume retention of good quality employment land. Nevertheless, we consider that the provision within Redditch should therefore be for at least 4,000 dwellings."*

3.88 Although much of these paragraph refers to work which will be considered later in the this policy context under 'Local Evidence', its important to recognise that the Panel's recommendation weighed towards the findings of the first WYG Report in preference to the second.

*"8.84. We reluctantly conclude that it would be inappropriate to recommend development within the Studley area in such circumstances. As any development in Stratford District west of the A435 accessed via Redditch ADR land would have such modest capacity that it would not be significant in strategic terms, we must conclude that provision should be made for around 3,000 dwellings for Redditch in Bromsgrove District. 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. Once the volume of development and its location has been defined it will be essential for the authorities to work together on cross-boundary implementation. We welcome the indications from the authorities that this would be the case. As for the cross-boundary employment provision, that portion which cannot be accommodated west of the A435 on the Stratford fringes of Redditch would need to be provided for within the development or developments agreed within Bromsgrove District. To enable the promised co-operation after the finalisation of the RSS, it will be important for the Core Strategies of the three Districts and particularly those of Redditch and Bromsgrove to be closely aligned in terms of their timetables and for there to be coordinated Examination of relevant aspects. We ascertained during the EiP that the Planning Inspectorate would seek to facilitate such action. In the longer term at the next review of the regional strategy under the SIRS provisions, we consider that the issue of the A435 to the south-east of Redditch should be given proper consideration so the merits or otherwise of development for Redditch in the Studley area can be assessed. In such a context, we consider that it would be entirely inappropriate for the Green Belt in Stratford-on-Avon District to be extended onto ADR land west of the A435 as canvassed in the draft Stratford-on-Avon Core Strategy."*

3.89 This paragraph explains the rational behind the Panel's conclusions about the housing and employment requirements within the Borough and the requirements adjacent to the Borough in cross boundary locations.

## The Localism Act (2011)

3.90 Section 109 provides for the abolition of the regional planning tier, by repealing Part 5 of the Local Democracy, Economic Development and Construction Act 2009, which only applies in relation to England. This removes responsible regional authorities, provision was also made to revoke the eight existing regional strategies outside London by order.

3.91 There was also an additional order making power allowing the Secretary of State to revoke any remaining county structure plan policies that were saved as part of the transitional provisions for the Planning and Compulsory Purchase Act 2004 so that those policies will cease to have effect. Currently, such saved policies form part of the development plan.

3.92 Finally, this section provides for the necessary consequential amendments to primary legislation, which are set out in Schedule 8 and Parts 15 and 16 of Schedule 25.

3.93 Until RSSs are abolished through the Localism Bill, adopted RSSs will remain part of the Development Plan and Draft RSSs are still a material consideration. The Secretary of State's announcement regarding the intended abolition is also a material consideration, though it is unclear whether this should carry more weight than emerging or published RSSs. The judgment undoubtedly adds to the uncertainty, confusion and delay facing decision makers and developers and further undermines the government's attempts to encourage new development.

3.94 For Redditch, a development target was recommended by the Panel Report for the Phase Two Revision, which does not have the same level of weight as an adopted RSS. Therefore the situation for Redditch stills remains unclear, it is therefore necessary to complete an appropriate level of local evidence to have a clear picture regarding development needs and the appropriate locations to meet these needs.

## Local Evidence

3.95 There are a number of key studies referred to in the policy review below which provide evidence which is useful for consideration for this Green Belt Study:

- A study of Green Belt land and ADR within Redditch Borough (2008)
- White Young Green Study into the Future Growth Implications of Redditch Town to 2026 (2007) (WYG 1)
- White Young Green Study into the Future Growth Implications of Redditch Second Stage Report (2009)
- Retail Needs Assessment (2008)
- Strategic Flood Risk Assessment Level 2 (2012)
- Open Space Needs Assessment (2009)

### A Study of Green Belt land and ADR within Redditch Borough (October 2008)

3.96 There are a number of important historical conclusions that have been made about the two areas of Green Belt at Brockhill which provide some context to consider in this study.

*"Redditch Joint Study 1988 - 5.1.2 …development should not allowed on ridge lines as development in these areas would be seen for some distance from the surrounding countryside. Ridge lines were identified at Hewell Park and Butlers Hill to the northwest of Redditch and in the vicinity of the Brockhill area."*

3.97 The steep topography has been historically recognised as a constraint. This is not a matter which will alter over time; therefore this is a significant factor to consider as part of this Green Belt review.

*"5.2.3 In dealing with the Green Belt, the Inspector appointed in 1995 to consider representations and objections to the Proposed Modifications to Borough of Redditch Local Plan No.2, did not disagree with the general point made by objectors about coalescence of Redditch with the Birmingham conurbation (Paragraph 3.7 of Local Plan Modifications Report). However, he concluded that the residential development at Brockhill would represent a negligible threat of coalescence with the conurbation. The Inspector commented further, in Paragraph 3.9, that the topography of the Brockhill site resembled a shallow bowl north of Salters Lane contained by rising land, and that the proposed housing area would be visible from other parts of the town but would be contained by higher land beyond. The protection of this higher land and designated Green Belt is therefore of fundamental importance."*

3.98 This is a further reference to the land on the higher slopes in the Green Belt area which are part of the review in this study. The constraints regarding topography in this location are consistently appearing in decision making therefore this is a significant matter to consider in this Green Belt review.

*"8.3.0 Inspector's Report on Deposit Local Plan No.2 - …the lower part of the land, lying to the east of the access track to Lowan's Hill Farm and extending north-eastwards as far as the A441, could provide for the further expansion of Redditch after the year 2001. The Inspector commented that the bulk of the land abutted the Enfield Industrial Area and, if eventually developed, might be best suited to industrial or commercial uses. The land to the east of the railway could offer a limited opportunity for longer term residential development, depending on the final alignment of the Proposed Bordesley By-pass."*

3.99 These conclusions suggest that there was a view that the northern parts of the ADR and the lower parts of the Green Belt would be suitable for some growth, but that the type of use would be constrained by existing development types. The residential opportunity mentioned on the east of the railway is part of the ADR and not Green Belt, however this parcel of land benefits from recent outline planning permission for a mix of uses in line with this recommendation. This would suggest that in very close proximity to the railway line that a similar mix of uses would be appropriate but other considerations would need to be factored into this.

*"Inspector's Report on Modifications to Local Plan No.2 - 8.3.5 Perhaps of some significance, in considering the extent of the Brockhill development and the Green Belt boundary adjacent to the ADR in the shallow valley to the west of Lowan's Hill Farm (Paragraph 3.26), the Inspector preferred the line put forward by the objectors since he believed that any development beyond this line could be regarded as encroachment on the countryside."*

3.100 This viewpoint is an important consideration for the developability land to the west of Lowans Hill Farm which has since been designated as Primarily Open Space. The extent of the open space as it travels northwards into land currently designated as Green Belt will be an important consideration for this Green Belt Review.

*"North West Redditch Master Plan - 8.3.15 …The assessment shows that:*

- *i lower parts of the site are visually well contained*
- *ii there are few views of the site from Redditch, except of the wooded high ground and, even then, this area is seen from a relatively few locations; and*
- *iii the northern part of the site, within the Arrow Valley, is the most visible, especially when seen from the rural areas to the north."*

*"8.3.16 Paragraph 5.31 contains the summary of the visual assessment for Site A, as follows:*

- *i the highest parts of the site and the wooded high ground are the most visually sensitive;*
- *ii the northern part of the site is most visible from the north, including from Grange Lane, the village of Bordesley and from St. Leonard's Church;*
- *iii Lowan's Hill Farm forms a landmark feature in the southern part of the site and is prominent in views from Redditch to the south, southeast and south-west; it is usually seen in the context of the town;*
- *iv lower parts of the site are more visually contained, due mainly to the surrounding landform; v most views of the site from Redditch are filtered by buildings and structures, and;*
- *vi the landform and large blocks of woodland at Butler's Hill and Brockhill limit views in from the north-west."*

3.101 These conclusions flag up issues with the visual containment which does vary across the Brockhill East area. Whilst the drafted North West Master Plan did not consider the Brockhill Green Belt areas within its remit, some of these conclusions about the more visible areas of the area would apply to a greater extent as the site approaches the higher land in the Green Belt.

*"8.3.18 6.4 Site A is constrained to the north by wooded high ground. This is the most visually sensitive, because of its prominence and its well defined landscape character.*
*6.5 The area around Lowan's Hill Farm is visible from a number of viewpoints within Redditch. Historically, it was situated next to an area of woodland. There is an opportunity to restore this character as part of any development or enhancement, as well as the restoration of lost hedgerows and woodland.*
*6.6 The area of Site A north of the railway is visually sensitive. It forms part of the Arrow Valley Character Area. From many viewpoints to the north, it appears unconnected to Redditch.*
*6.7 The lower part of Site A is visually well-enclosed and least sensitive to change. This area provides a good opportunity for development. Red Ditch runs along the southern boundary of Site A and forms a strong landscape feature, with potential for enhancement."*

3.102 There are a number of constraints mentioned above that provide some significant issues that would be relevant for areas currently designated as Green Belt, and are therefore relevant considerations for this Green Belt study.

*"6.13 Development on the land north of the railway on Site A would lie within the Arrow Valley. Such development would bring the urban area of Redditch closer to the more rural parts of the valley. However, new planting could integrate the site within the valley and with the Abbey Park Golf and Country Club on the opposite side of the valley."*

3.103 This reference points towards an issue with the encroachment of urban type development into the area of the Arrow Valley which would need to be a consideration for the wider Green Belt study.

## White Young Green Study Into the Future Growth Implications of Redditch Town to 2026 (2007) (WYG 1)

3.104 This jointly commissioned study was the first of two studies prepared by WYG consultants (also referred to above under the Regional planning policy context). This first stage report (WYG 1) was a lengthy review of a number of locations around Redditch and its aim was to gather information about constraints at all of these locations. Although the study was jointly commissioned, different officers from all of the Authorities involved doubted some of the contents of the report, and some criticism (more so of the WYG 2 report) were directed to the report from the RSS Panel. Therefore there are a number of instances below where Redditch Borough Council Officers have clarified some of the evidence contained within the study which are known to be incorrect so that the context can be as accurate at possible for consideration for this Green Belt Study.

*"2.14 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."*

3.105 The general principle of maintaining Redditch's unique features in any planned growth location is strongly supported, however it should be further stated that this should be applied with a caveat that this is preferable where it genuinely supports sustainability principles and does not cause harm. The gross land take is likely to be greater given the characteristics but this can be mitigated against by endorsing sensible policy to ensure the benefits of multifunctional Green Infrastructure are realised. These are relevant considerations to factor into Stage 2 analysis within this Study.

*"4.14 Redditch Borough Council has adopted the recommendations of an Open Space Needs Assessment report by Scott Wilson. This concludes that Redditch should maintain its current ratio of 7.43ha of open space per 1000 population which includes the NPFA standard of 2.7ha/1000 for Playing Fields. This is accepted as being a high ratio*

*when compared to most other towns and stems from Redditch's planned structure as a New Town. It is considered that any major expansion of the town should continue the town's established character."*

3.106 Whilst it is agreed that Redditch Borough Council policy is and has been to maintain its current standard of the open space per 1000 population, the ratio is not 7.43Ha as stated in the WYG 1 report. The Open Space Needs Assessment (2009) recommends a modest 5.7Ha per 1000 population is maintained (this is updated since the WYG 1 report as the OSNA for Redditch was completed after WYG 1). Historically Redditch has had no known difficulties in maintaining the original 7.43Ha ratio when implementing development through planning applications and the Local Plan No.3 Policy R.1 continues to be successful contributions towards Open Space are also being received in line with the adopted Open Space Supplementary Planning Document.

*"5.05 …Bromsgrove District Council uses the designations of 'Landscape Protection Area' and 'Area of Great Landscape Value' and Stratford-on-Avon District Council uses the designation of "Special Landscape Area", whilst Redditch Borough Council only uses the designation of Green Belt to cover the extensive area of open countryside to the southwest of the town. Looked at objectively, the quality of the landscape in that area is similar to landscape which carries a greater array of protective policy within the other districts."*

3.107 Redditch's south western areas include Green Belt designation and Open Countryside designation with relevant policy protection for this through saved policies in Local Plan No.3. The paragraph above highlights differences in policy designations between the Authorities, despite there being no difference in the quality of the landscape. WYG 1 conclusions about the relative merits of 'landscape quality' would seem to be corroborated by aspects of the Worcestershire Landscape Character Assessment. Whilst is it unclear about the future of the landscape policies in neighbouring Districts surrounding Redditch, it does raise a question about consistency of designation.

*"7.03 WYG has not, within the scope of this study, sought to identify any potential land ownership constraints which could prevent or hinder development going forward on an individual site."*

3.108 Although not considered in the WYG 1 study, land ownership constraints do form an important part of identifying the best locations for growth because of the importance attached to delivery of the eventual strategy.

*"8.08 The important caveats are that the range of employment opportunities in Redditch cannot contend with that available in the Birmingham conurbation, leading to high levels of net out commuting (assisted by the excellent accessibility to the conurbation by car). Accessibility by train and bus to Birmingham is not as good as it could be (leading to further increased reliance on the car for commuting/shopping purposes)."*

3.109 Whilst there is some degree of commuting and excellent links to the conurbation by private car, there are planned improvements to the frequency and quality of rail service between Redditch and Birmingham, as well as other policy and funding secured to improve sustainable transport choices in the Borough. In terms of shopping, Redditch town centre does have a retail offer far more advanced than a town of its size/population would normally sustain and one of the key themes of the Local Plan is to enhance the retail offer.

*"8.11 A strategic assessment of the existing road network carried out by WYG as part of the study has identified constraints in terms of the capacity of parts of the primary distributor and district distributor network, to accommodate the additional traffic likely to be generated by accommodating Growth Options 2 or 3."*

3.110 A Transport Assessment has been completed for Redditch Borough Council since the publication of this report, with more work anticipated. The report focuses on issues with the capacity of the existing road network and Redditch's possible strategic sites. It is recommended that further detailed work needs to be undertaken to determine effects on the road network of accommodating the additional Redditch growth.

*"8.12 In terms of accessibility by non-car modes, concentrating major new urban development to the north (associated with the A441 (north) link) and north-west (associated with the A448 (west) link) of the town, would the most sustainable locations. (i.e. SWOT sites 5, 6, 8, 11 and 9)."*

3.111 Due to the location of the Town Centre within the town and the location of the key routes into and out of the Borough, this is a logical conclusion in WYG 1. In terms of accessibility,

the development sites located in the vicinity of these main roads is generally much more prevalent to various types of services by a range of modes of transport in these locations than other sites at the edge of the Borough.

*"8.12 There are a number of link roads and junctions within Redditch that appear to be at, or nearing, operational capacity – these being the A441 (north) Bordesley link, the A435 (east) link and Crabbs Cross roundabout. All other assessed links/junctions appear to be operating within design capacity."*

3.112 There has been a Transport Assessment completed for Redditch Borough Council since this report, focussing on issues with the capacity of the existing road network and junction impacts of Redditch's possible strategic sites. Further detailed work is anticipated to determine effects on the road network of accommodating the additional Redditch growth.

*"8.12 Following assessment of the level of additional growth (residential and employment) needed to accommodate the three growth options and consequent improvements to the highway network required, it is considered that the primary highway network is able to accommodate the growth associated with Options 1, 2 or 3 within either the north west, north east or south east quadrants, subject to adequate infrastructure improvement measures on parts of the main road network."*

3.113 It is not clear in the WYG 1 report what specific highway improvements would be required and the reference to such a broad area does not help to determine which of these locations would be the most sustainable location. There can be no certainty at this stage about cost of these improvements and what scale of development would be able to be accommodated. It is important to note that this statement does not include the south western areas of Redditch Green Belt.

*"8.12 From consideration of the combination of sustainable accessibility and estimated infrastructure costs the report suggests that the most appropriate locations to accommodate major growth are as follows:*
*- for Spatial Option 1, all development is accommodated by existing "committed developments"*
*- for Spatial Option 2, development concentrated around the A441 (north) link, or A448 Bromsgrove Highway Link. (SWOT site numbers 6, 8 and 11)*
*- for Spatial Option 3, development concentrated around the A441 (north) link, or A448 Bromsgrove Highway Link. (SWOT site numbers 5, 6, 8 and 11)"*

3.114 Although these areas mentioned in the WYG 1 report are very broad, Officers would generally concur that from using only local knowledge of the area and existing infrastructure information available that in terms of likely infrastructure costs that this general conclusion would appear to be correct. Again it is important to note that these SWOT areas do not include any of the south western areas of Redditch nor the South eastern areas.

*"8.14 The supply of gas should not influence either the number of new homes in Redditch or the location of new homes as all growth options can be accommodated through a connection from the existing medium pressure network. Generally, the further development is located from the existing medium pressure network, the greater the capital investment required from developers and development agencies."*

3.115 It is agreed that gas supply wouldn't be a constraining factor in Redditch. The Council has accessed the maps of the medium pressure network and there seem to be no advantageous or disadvantageous locations around the Borough.

*"8.14 The existing data and telecommunication network in Redditch should not unduly influence housing growth or the location of housing growth. The best connections for development growth in terms of economics would be to the north of the town centre where there are ADSL and SDSL networks; telephone exchanges to the south, west and east are ADSL only."*

3.116 Although there is an obvious preference for a location for development in terms of telecommunication infrastructure costs there are planned improvements. Recently announced public funding via grants into telecommunications within Redditch would further improve the networks across the Borough which means that in the longer term this may not be so much of an issue. The location of the areas being considered through this report benefit from availability of both ADSL and ADSL networks.

*"8.14 The supply of network electricity should not unduly affect residential growth beyond Redditch although capital investment costs might be reduced by locating new homes in certain locations beyond the east of the town. Development to the south and west of Redditch would be most expensive. (SWOT site numbers 1 to 4)"*

3.117 There are no reasons to suggest that this wouldn't continue to be an appropriate conclusion and the areas being considered through this study would appear to be capable of being supplied.

*"8.14 In respect of drainage, the most sustainable and perhaps least expensive locations to construct new homes beyond Redditch are areas where the permeability of the soil is the greatest and failing this close to existing water courses, most likely to the north and east of Redditch. (SWOT site numbers 8 to 10 and 15 to 20)"*

3.118 This conclusion is not going to change given that it's based upon estimated costs of engineering solutions. The areas being considered through this study would appear to be located in an area where they would be capable of delivering sustainable drainage solutions.

*"8.15 The report finds that the single most pertinent utility infrastructure constraint is provision for foul water disposal and development to the west of the River Arrow would be potentially more expensive and less sustainable in that respect."*

3.119 This position is considered further through the Water Cycle Strategy update and through on-going discussions with service providers.

*"Severn Trent Water has stated that there are no planned capital works being carried out to the Spernal Sewage Treatment Works (STW), located to the southeast of Redditch treating most of central, northern and eastern areas of the town. Detailed modelling will be required to assess the capacity of each of the growth options against the existing effluent discharge licence but it is understood anecdotally from Redditch Borough Council that the discharge consent into the River Arrow at Spernal STW is not too onerous; confirmation from Severn Trent Water is still outstanding."*

3.120 This exercise is being undertaken with a maximum growth scenario of 7,000 dwellings being modelled. Given updates to the Water Cycle Strategy the position with Spernal treatment works may need to be reviewed in conjunction with STWL.

*"Foul flows from any major new development in or around Redditch would most likely be conveyed to Spernal STW either by gravity (new development to the north, south and east of Redditch) or a combination of pumping and gravity from the western perimeter of the town (see below). Providing treated effluent discharge licenses into the River Arrow are flexible at this location as suggested above then any capital investment to increase the capacity of the treatment works should be funded by the incumbent licensed Sewerage Undertaker (Severn Trent Water) provided the new development is allocated within the next Development Plan (a Sewerage Undertaker has a duty to provide capital investment for population growth allocated in a Development Plan)."*

3.121 The concept of pumping from western areas of Redditch to Spernal may no longer be the only engineered solution for foul sewerage; therefore this conclusion would have to be reviewed in light of on-going discussions with service providers.

*"Irrespective of whether development is 'allocated' any development in or around Redditch may be significantly constrained by Severn Trent Water's feasibility, design and build programmes for the delivery of new assets. Severn Trent Water will not programme this work before their 2010 - 2015 capital investment period (AMP5)."*

3.122 This is being fully explored with STW through on-going discussions with service providers.

*"Severn Trent Water has stated that major planned capital work is planned to the Priest Bridge Sewage Treatment Works (south west of Redditch treating existing flows from the west of the town) within the AMP4 period (2005-2010). This capital work is based on a current design population of 15,000 and therefore does not include for any of the growth options in this study. Severn Trent Water has advised that the Sewage Treatment Works will be difficult to extend once these works have been carried out thus limiting population growth to the west of Redditch unless new foul flows are pumped over the 'ridge' into the catchment served by Spernal STW. Pumping all foul water over the 'ridge' from the west to the east of the town will not be a wholly sustainable solution."*

3.123 Headroom capacity at Priestbridge may have been improved following investment however this will need to be reviewed through on-going discussions with service providers.

*"The existing sewerage network within and downstream of Redditch Town Centre is stressed and has a history of sewer flooding. Effectively any significant new development north or northwest of the town centre may require a complex engineering solution with likely disruption to the centre of Redditch."*

3.124 This conclusion will need to be reviewed through on-going discussions with service providers.

*"The Bow Brook River downstream of the Priest Bridge Sewage Treatment Works to the west of Redditch and the River Arrow downstream of the Spernal Sewage Treatment works to the south east of Redditch are considered unsuitable to accept significant amounts of additional treated effluent from the treatment works."*

3.125 This conclusion will need to be reviewed through on-going discussions with service providers.

*"8.16 Effectively any development to the southwest of 'The Ridge' (very approximately the A448) would have to be drained to Spernal Sewage Treatment works using one or more pumps. These pumps would have to be designed such that foul water is pumped to an outfall downstream of the stressed sewerage network in the town centre."*

3.126 This conclusion will need to be reviewed through on-going discussions with service providers.

*"8.17 Any development to the north or northwest (upstream) of the Town Centre may trigger a very convoluted scheme to convey water to Spernal Sewage Treatment Works via a new trunk sewer through the town centre, or by pumping flows into a new trunk sewer further east."*

3.127 This conclusion will need to be reviewed through on-going discussions with service providers.

*"8.19 The report concludes that it is "becoming clear that large scale residential development generally to the east of the River Arrow is preferable in terms of reduced capital investment and more sustainable solutions (reduced foul water pumping costs). Both foul water and electricity solutions will be cheaper and simpler [to the east of the town] & [i.e. SWOT sites 8 to 10 and 15 to 20]"*

3.128 This original conclusion is somewhat confusing. This analysis should have applied to any development locations to the east of the Ridgeline, rather than the River Arrow as the river is not the determinant location for potentially higher infrastructure costs. This conclusion will need to be reviewed though on-going discussions with service providers.

*"8.21 Development in this area (north west quadrant) offers the following advantages:*

- *Sufficient land is available to accommodate Growth Options 2 and 3, taking into account physical constraints and flood risk areas.*
- *The potential to link to the A448 and the A441 corridors.*
- *Site 6 contains an ADR with potential to extend the development area beyond the current boundaries.*
- *Potential for development along the rail/river corridor, including possibility of relocating the Redditch train station and dualling of the track between Redditch and Barnt Green, and potentially, the provision of a high quality new business park with good connections to the M42.*
- *Would facilitate funding of the Bordesley bypass and related A441 (north) link improvements.*
- *Site 6, the southern part of Site 11 and the eastern part of Site 5 are well located relative to Redditch town centre and existing and proposed employment areas.*

*8.22 However development in this quadrant also has a number of disadvantages including:*

- *The disposition of the various physical constraints is such as it would lead to a fragmented development pattern within the quadrant.*
- *Major development within Sites 5, 6 and 11 would probably require a new road crossing of the main railway line (if the relocation of the train station is not feasible) to create a highway link between the A448 and A441. Given the various constraints, in particular variations in topography, such a highway link would be very expensive and potentially time consuming to achieve.*
- *The sites are all to the west of the River Arrow, and as such the foul drainage requirements would be more difficult and costly to meet.*

3.129 The potential to link the A441 and A448 corridors is a valid consideration; however this can only be pursued following consideration of infrastructure needs related to the scale of growth.

3.130 It is accepted that WYG 1 Site 6 contains one of Redditch's ADRs which is the most sustainable 'in-boundary' strategic growth location, which obviously lends itself well for further development locations adjacent. This could be the same for the other strategic locations; however it is more of an opportunity in this location given its comparative sustainable development potential, and hence why it is part of a proposed sites subject to analysis.

3.131 The potential for development along the rail corridor raises questions about environmental impact, and the river corridor could only really be quantified in light of detailed work on flood

risk being analysed as well as overcoming other GI issues. The relocation of Redditch train station is not, and has never been a viable project and it is not known where this conclusion came from. These options are relevant to consider in the vicinity of the two proposed Sites subject to analysis.

3.132 WYG 1 report indentifies the Bordesley Bypass as a piece of transport that may be delivered as part of development. This scheme is also identified in the Worcestershire Local Transport Plan No.3, however this scheme, should it be required, is dependant upon developer funding only. Therefore the viability of scheme is, at this stage, uncertain.

3.133 All accessibility evidence points to the conclusion regarding accessibility to employment being a valid conclusion in the areas suggested.

3.134 The disadvantage cited regarding the area being physically constrained leading to fragmented development is not considered to be an overriding constraint of the two areas to wholly rule out development potential. The nature of the topography and character of the area would necessitate sensitive treatment of any potential development. This could be a good solution to an edge of town location and would better reflect the nature of other fringe locations areas around Redditch.

3.135 It is not clear how the concept of relocating the train station has arisen, and it is also not clear how its relocation or otherwise would affect the necessary highway links across the railway line. It is agreed that major development in this location would necessitate the crossing of the railway line but it is not necessarily required to link the A448 and A441 other than planning links through Redditch's emerging strategic site at Brockhill. This could of course change if further major development proposals are looked at in Area 11 but the scale of this would presumably have to be very large. In terms of the expense of the link, the crossing of the railway line would be directly related to the development both east and west of the railway line and therefore have to be planned carefully. Any development over 200 dwellings would need servicing off two full access points. These are considerations for the proposed Brockhill East Strategic Site.

3.136 As stated previously the conclusion in the WYG 1 Report regarding sites west of the River Arrow is erroneous.

*"8.33 Should Redditch be required to accommodate Growth Option 2, it can be seen from Tables 4 and 5 that notwithstanding the development of the three designated ADRs and also the Winyates Green Triangle site up to their maximum potential, there would still be a requirement to release additional land on the urban periphery currently within the Green Belt. Taking into account the range of constraints and opportunities assessed in the context of various land parcels considered to have some potential to accommodate growth, it is concluded that the adverse strategic planning implications associated with accommodating growth adjacent to the town would be minimised to the north/north east with development concentrated around the A441 (north) link (SWOT site areas 6, 8 and 11)."*

3.137 This paragraph of the WYG 1 report comes to the same conclusion that the RSS continued to suggest would be the case at Redditch; that even utilising Redditch's maximum development potential, Green Belt periphery sites are justified. The paragraph mentioned the locations which would be preferable, and the proposed sites within Redditch would fit with this conclusion.

*"8.37 Further consideration should also be given to accommodating development around the A448 (west) link (SWOT Sites 4 and 5) coupled with new junction connections to the A448, although the extent to which SWOT Site 5 can contribute is substantially reduced by flooding and topography. The prospects of being able to create a long term defensible Green Belt boundary formed by a major road connection between the A448 (west) link and the A441 (north), are slim, due to a combination of severe topography, flood risk, protected wildlife sites and the need to cross the main Redditch to Birmingham railway."*

3.138 It is necessary for the transport implications of major growth areas being proposed would have to be investigated properly before concluding this, and to understand the need for the related trigger points and other issues around the suggested 'link roads'. The suggestions

in the paragraph of the WYG 1 Report about the Green Belt boundary creation should be considered as part of this study.

*"8.40 One constraint to development northwards that will require further investigation, however, is mineral deposits. According to the adopted Hereford and Worcester Minerals Plan Proposals Map there are several areas of sand and gravel deposits to the north and west of Redditch. Parts of sites 5, 8, 9 and 10 are subject to that constraint to some extent. Policy M.2 of the adopted Worcestershire County Structure Plan seeks to safeguard such known mineral deposit areas and proposals for development which would sterilise or prevent them from being worked will be resisted unless certain criteria are met. Any proposal to promote major housing and related development within sites 5, 8, 9 and 10 would need to be carefully assessed against the relevant criteria."*

3.139 The area of sand and gravel deposits noted on the Hereford and Worcestershire Minerals Plan (through the Local Plan) does actually cover the majority of the Brockhill West Green Belt area. Feedback from Worcestershire County Council indicates that the BGS 1:10,000 geological map shows a former gravel pit on the site with "clean sand and gravel beds and lines of silt clay and stony clay." A borehole, (No. 28) in the deposit is recorded as showing Boulder Clay to 2.0m. Clayey sand to 5.2m and Brown Mudstone to 7.6m. Worcestershire County Council advice is that the sand and gravel deposit falls within the parameters of a workable deposit. These are both secondary constraints. To understand the sites potential, an assessment of the existence of the minerals deposit has been completed (Land at Brockhill West, Redditch Geological Investigation of Potential Mineral Deposits, December 2011) and concluded that there are no constraints to development in this area and the deposits that were identified were not viable for extraction.

*"Site reference: 5 Land East of A448*

*STRENGTHS*
*1 Relatively well connected to Redditch town centre and existing employment areas*
*2 Potential to link to A448 through upgrade of existing access*
*3 Logical extension to relatively new housing area (Brockhill)*
*4 Limited highway impact on town centre*
*WEAKNESSES*
*1 Green Belt*
*2 Steep topography running alongside A448*
*3 Southern part designated as SWS and LNR and northern part is SWS*
*4 Site traversed by land in Flood Zone 3*
*5 Upstream of very stressed sewerage network therefore foul drainage would naturally drain into town centre network with flooding history*
*6 Sand and gravel deposits identified on part of site*
*7 Lack of capacity in local first school*
*OPPORTUNITIES*
*1 Sustainable urban expansion, close to existing facilities*
*2 High quality public transport along A448*
*3 Could link to site 6 to provide critical mass to deliver infrastructure*
*THREATS*
*1 Potential objection by Environment Agency on grounds of flood risk*
*2 Risk of sewer flooding in town centre unless more complex scheme, potentially involving a new trunk sewer to link to Spernal Sewage Treatment Works, implemented."*

3.140 These extract from WYG1 is relevant for this study as the SWOT area 5 includes some of the Brockhill West site for consideration.

3.141 The strengths of Site 5 remain valid conclusions however Point 1 can be updated by information in the Redditch Accessibility Study which suggests that Brockhill West has reasonable accessibility to key services by a range of modes but improvements would be required. On point 2 it is not quantified what the cost implications of this infrastructure upgrade are.

3.142 Weaknesses of Site 5 are somewhat updated by new evidence e.g. Hewell Grange conservation area. Point 1 on Green Belt being a weakness is valid for the majority of these sites so it's not clear why this site was singled out in the WYG 1 Report. The steepness of the topography obviously remains as a weakness but comparatively with some other steeper areas, this site is not as viewed as weak. Point 5 has been updated by information in the SFRA Level 2 and updated Water Cycle Strategy and on-going discussions with

STW. Point 6 on sand and gravel deposits has been investigated further and there are no issues regarding mineral deposits which prohibit development in this location. Point 7 on educational infrastructure would also be updated by officers in the preparation of the IDP.

3.143 Opportunities of Site 5 are misleading in its terminology as point 2 refers to public transport along highways, however Redditch 'highways' do not tend to be routes for public transport.

3.144 Threats of Site 5 can now be considered in light of information in the SFRA Level 2 and Water Cycle Strategy and on-going discussion with STW.

*"Site reference: 6 Land north and south of Lowan's Hill Farm*

*STRENGTHS*
*1 Good links to Redditch town centre, including railway station, existing community facilities and also local employment areas*
*2 Substantial part of site already designated as ADR - therefore principle of development accepted*
*3 Links to existing residential areas*
*4 No environmental designation*
*5 Relatively low impact on Redditch highways*
*6 Provide relatively modest priced utility connections*
*WEAKNESSES*
*1 Partially Green Belt*
*2 Abuts SWS to north and west*
*3 Site dissected by operational railway line. However land to the east and west of the railway line could be developed separately, if necessary, failing the relocation of railway station (see opportunities below)*
*4 Traffic generated would pass through Windsor Road, which has limited capacity in peak hours – might be partly mitigated by signalised junction*
*5 Would load traffic onto A441, adversely affecting Bordesley*
*6 Would affect B4101*
*7 Steep topography*
*8 Upstream of very stressed sewerage network therefore foul drainage would naturally drain into town centre network with flooding history*
*9 Lack of capacity in local first schools*
*OPPORTUNITIES*
*1 Sustainable urban expansion, close to existing facilities.*
*2 If developed in conjunction with land to north, offers opportunity to relocate railway station to provide new transport interchange and park and ride facility linking to town centre*
*3 Potential to contribute to implementation of Bordesley By-pass*
*THREATS*
*1 Transport interchange and alterations to railway line relies on cooperation of Network Rail*
*2 Potential objections from Highways Agency re loading additional traffic onto J2 of M42*
*3 Risk of sewer flooding in town centre unless more complex scheme, potentially involving a new trunk sewer to link to Spernal Sewage Treatment Works, implemented."*

3.145 This extract from WYG1 is relevant for this study as the SWOT area 6 includes some of the proposed Brockhill East Site for consideration.

3.146 Point 1 on accessibility has been updated by more detailed analysis in the Accessibility Assessment which suggests that sites within the Borough in Site 6 are the most accessible to a range of services by a range of modes of transport. Point 2 about the ADR designation is incorrect. Redditch's plan policy in B(RA).3 which reflects other ADR Policy in the Worcestershire Structure Plan and safeguarded land policy in PPG2 and the NPPF makes it clear that the development potential of ADR designation must be re-assessed during Development Plan Document review, so the principle of future development being accepted is not correct. More accurately the strength of Site 6 is that it contains unimplemented sites designated through Local Plan No.3. The impact on Redditch highways is also updated by work completed on Redditch traffic model and also Transport Assessment completed in relation to planning applications received since the report was undertaken.

3.147 Weaknesses of Site 5 are somewhat no longer valid. In relation to point 2, the weakness of abutting a wildlife designation is not considered to be as potentially damaging as development options containing the designations (Site 5 and Site 11). On point 3 see comments in sections above regarding inaccuracy of the conclusion on railway station relocation. Point 5 and point 6 would have to be considered in detail against all relevant growth options. Point 8 can now be updated by more up to date evidence in the SFRA

Level 2 and Water Cycle Strategy and through on-going discussion with STW. The culmination of this evidence demonstrates there are no overarching reasons why development could not occur in these locations. Point 9 on educational infrastructure would also be updated by officers in the preparation of the IDP.

3.148 Opportunities of Site 6 are generally still valid however point 1 can be updated by more up to date information in Redditch's Accessibility Assessment. On point 2 see comments above regarding inaccuracies of the conclusion in the railway station relocation. Other opportunities also exist in this location to remedy service infrastructure provision.

3.149 Threats of Site 6 are generally valid however the threat in point 1 regarding cooperation of network rail also involve consideration of adjacent landowner east of the railway line – see comments above. Point 3 would be updated following the completion of the Water Cycle Strategy Update.

## White Young Green Study into the Future Growth Implications of Redditch Second Stage Report (2009)

*4.05 A common objective of many planning policies and recent development plans seek to prevent the unnecessary sprawl of urban development by giving priority to the redevelopment of brownfield sites and other sites within the urban area before looking at extensions and in so doing this assists in safeguarding the countryside. Redditch is not a historic town and does not have significant areas of brownfield land. Therefore the principal aim of the Redditch Green Belt is to prevent neighbouring towns coalescing, to prevent unnecessary sprawl and to safeguard the countryside.*

3.150 WYG 2 specifically established that the town is not historic and therefore provides some relevant context for the methodology of this Green Belt Review in terms of what Green Belt purposes are likely to be more relevant.

*"5.11 …the landform is very much a continuation of the landscape character of the land to the north within Bromsgrove District. This land is designated within the Bromsgrove Local Plan as being of High Landscape Value. Were it not for the administrative boundary and the needs for Redditch to identify development land within its own boundaries we are of the opinion that this designation would have been extended to most if not all of the site to the west of the railway line."*

3.151 This viewpoint is difficult to substantiate as the original criteria for the landscape designations in Bromsgrove are not being used to make this conclusion; however the nature of the landscape in this area is not dissimilar, therefore this is a relevant consideration as a constraining factor for this Green Belt study.

*"5.12 The development of the site would benefit by the construction of a link between Brockhill Drive and the A441 but the railway is a major impediment to the provision of such a route."*

3.152 An engineering solution could be designed to overcome the impediment of the railway line, so it is not such a major constraint to development as it is mentioned here. The need for the link between Brockhill Drive and the A441 is a consideration for potential site development, as this infrastructure could include some highway development skirting into the Green Belt areas closest to the railway line.

*5.13 Whilst the quality of the pedestrian and cycleway links through industrial estates and via Windsor Road may be unattractive the proximity of the site to the town centre must be regarded as being relatively sustainable. However we are of the opinion that the difficulties of developing this land together with the potential effects of developing on these prominent slopes in an area of landscape value outweigh the benefits of a location near to the town centre and for this reason we do not believe that this area of land should be considered for development in the first instance. The exception to this is that part of the ADR laying to the east of the railway line amounting to 5.8 ha which forms part of the Bordesley valley which we consider as part of Area 8: Bordesley Park.*

3.153 The difficulties mentioned should not be an overriding wholesale constraint to development in this area. Whilst it is accepted that there are issues which make some pockets undevelopable, the WYG 2 study exaggerates the constraints. There also appears to be no physical difficulties with linking development east and west of the railway line, therefore there is no need to excuse exceptions to development in this area.

*"5.50 Foxlydiate Woods: Although designated as Green Belt we are of the opinion that its development would not significantly reduce the gap between Redditch and Bromsgrove. The site is also reasonably well screened particularly from the Bromsgrove Highway and would not read as a major extension of the urban area into the surrounding countryside."*

3.154 These are conclusions which can be considered for this Green Belt study.

*"7.16 The following map shows the Green Belt around Redditch with the worst case scenario, the NLP growth option, edged red and the ADRs coloured Green. Whilst this demonstrates that this would amount to a major incursion in to the Green Belt, the gap between Redditch and Birmingham is substantial and able to accommodate this level of development without threat of coalescence. The map also shows that the gap between Redditch and Bromsgrove would be less able to accommodate this level of growth and that the gap between Redditch and Astwood Bank and Studley would be lost if development was concentrated to the south."*

3.155 This extract from WYG2 is relevant context because it is not considered that there was any explanation or justification in the WYG2 report for the conclusion that the gap between Redditch and Birmingham was less sensitive that the gap between Redditch and Bromsgrove.

## Retail Needs Assessment (2008)

*"8.21 In the context of continuing research into the preferred location for significant housing growth in and around Redditch, there is likely to be scope for the provision of a new district centre (or centres) to serve the needs of the larger new housing areas. Such a centre (or centres) could also help serve local needs in existing areas which currently lack a range of facilities (e.g. some northern and western areas of Redditch). A new district centre may not necessarily be located within the administrative boundary of Redditch. The location of new centres should be carefully considered in the context of the need to serve new housing growth areas and existing housing areas within Redditch which lack easy access to a foodstore capable of serving main food shopping requirements."*

3.156 This new retail provision is an important consideration given the need to identify land for significant development, in particular in relation to the lack of facilities identified in northern and western areas of Redditch. The landform in the area means that the correct positioning of this type of use will need careful consideration.

## Open Space Needs Assessment (2009)

3.157 The evidence in the Open Space Needs Assessment (2009) provides some context which whist not directly related to the Green Belt study, when it comes to development proposal and site area the level of open space provision will need to be considered.

*"The overall Borough standard of unrestricted open space is 9.08ha/1000 population. Comparison with the NPFA standard shows that there are 8.6ha/1000 population of formal open space, which is considered to be a healthy figure. The third figure of 5.9ha/1000 population disregards the sub-regional site of Arrow Valley Park and those sites below 0.4ha because it is considered that the future supply of such sites would not be requested in developer contributions."*

*"Based on the sites identified in the SHLAA and Employment Land Review, the provision of open space in the Borough will fall to 5.78/1000 population.* ***Based on this figure it is recommended that the standard of open space in the Borough does not fall below 5.7ha/1000 population****. In order to ensure that this is achieved it is also proposed that open space loses/additions are monitored, and a report be produced annually which provides detail on the provision levels in the Borough."*

3.158 The standards for open space provision within Redditch are demonstrated to be healthy through the Assessment. There are no reasons to suggest that the local standards for open space are no longer valid, and Redditch's open spaces continue to be a feature of one of the Council's most important corporate priorities is to be 'Green'. The overall standard of open space has reduced in the Borough since the previous standard however this is mainly as a result of the deduction of the Arrow Valley Park from the calculation. The conclusions of the OSNA recommend that based on the losses incurred, and after full assessment of open space typology provision that the new standards need to be maintained. Officers do not know of any reasons to justify any amendments to this conclusion. These standards of provision will need to be considered in the development of any of the Strategic Sites within Redditch.

## Key Points from Planning Policy Context

3.159 There are a number of key points that have been extracted from the full policy review above which are important for consideration in this study, they are:

- There is a very strong justification for the release of Green Belt for development within Redditch;
- There are a number of independent sources that conclude that Redditch development requirements exceed the Borough's capacity;
- Redditch Borough is not capable of planning for growth over and above its own development needs;
- Pressure exists to find the most sustainable locations for both housing and employment development;
- Green Belt purposes in the NPPF should form the basis for the analysis in this Study;
- There are a number of issues that are relevant both for this Green Belt Study and the wider Green Belt Review to consider cross boundary growth locations. The conclusions of this study must therefore relate to the wider review;
- There will need to be constant monitoring of the changes proposed in relevant nearby Local Plans or Core Strategies;
- Early phasing of residential and employment uses on Green Belt sites within the Borough is justified;
- Consider the need to ensure that standards of open space provision are met in the development of the Strategic Sites;
- Consider any relevant land ownership constraints within the sites; and
- Constraints information in previous study, particularly WYG 1 can be updated and inform policy development.

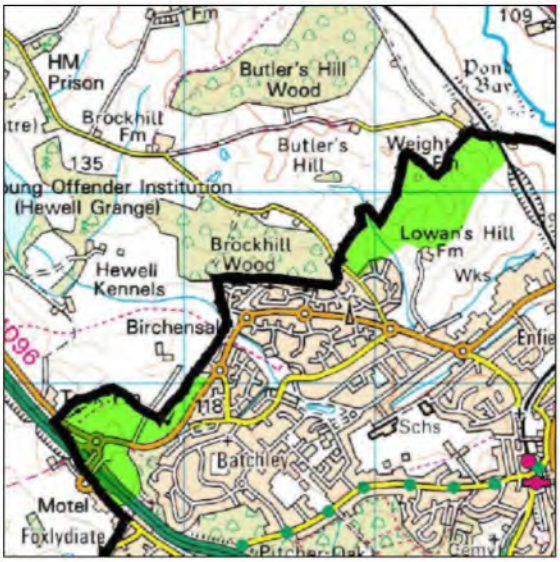
## 4. Context to Green Belt land within Redditch

4. 1 The administrative area of Redditch contains four separate areas of Green Belt land covering a combined total of 1,826 Hectares land. The main area of Green Belt land (which will not be considered in this study) is the land to the south west of Redditch Town, this section of Green Belt covers approximately 50% of the administrative area of Redditch Borough. This area of land has been the subject of previous studies which have investigated the potential of this area for development. The culmination of these studies concludes there is no development potential in this area and the Green Belt in this area should remain as designated. There is also a small Green Belt area to the west of the Borough, to the south of the A448.

4.2 The third area of Green Belt land in the Borough is what has traditionally been termed as Brockhill East Green Belt, which covers a total of 27.7 Hectares of land. This land is located to the north of the Borough, and is a wedge of land located between the previously designated Brockhill Area of Development Restraint (ADR) to the south east, the Borough administrative boundary to north and the existing Brockhill estate the south west.

4.3 The fourth and final section of Green Belt is the portion of Green Belt at Brockhill West (also termed 'Foxlydiate Green Belt'), which covers a total of 22.1 Hectares of land. This section of Green Belt is bounded by the administrative boundary to the north, the Brockhill estate to east and the A448 Bromsgrove Highway to the south (although a small portion of Green Belt land is located on the south east side of the A448).

4.4 The two portions of Green Belt that are the subject of this study can be seen below at Map 1. The remaining report will go on to analyse these two areas in relation to Green Belt purposes and site specific constraints.



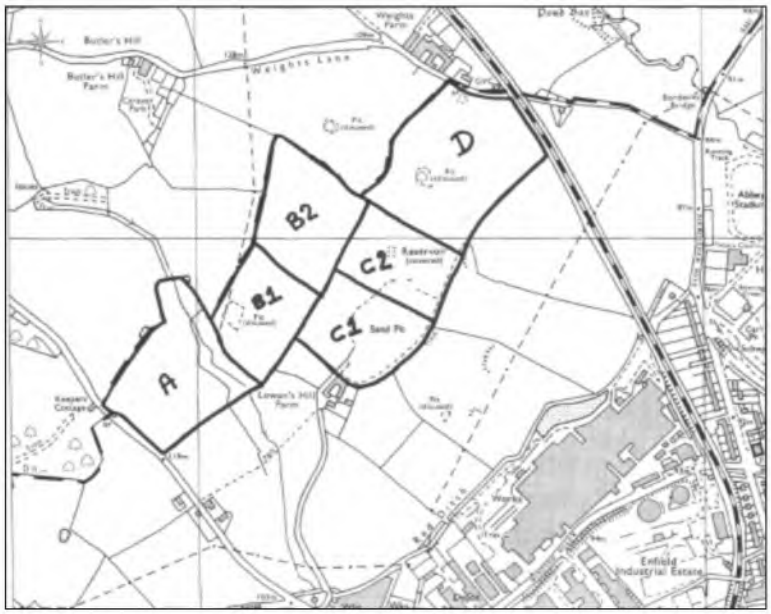

**Map 1**: Green Belt land within the Brockhill area

## 5. Stage 1 Initial Site Sieving

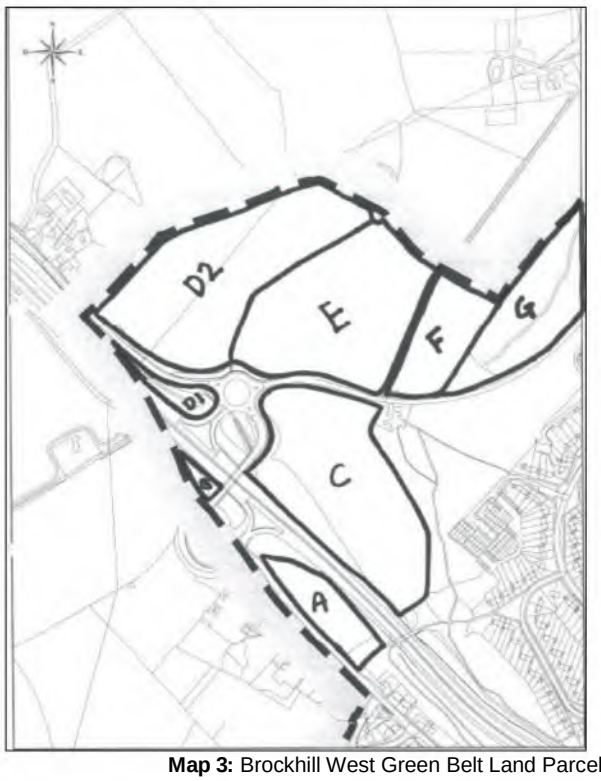
5.1. The following section looks at the individual Green Belt Land parcels against the Green Belt purposes set out in the NPPF. The following Maps show how the Green Belt parcels have been divided for the purposes of this assessment.

5.2 With regard to scoring, the following methodology has been applied:

+ = the parcel of land does fulfil the purpose (**one** mark will be given)
- = the parcel of land does not fulfil the purpose (**no** marks will be given)




**Map 2:** Brockhill East Green Belt Land Parcels




**Map 3:** Brockhill West Green Belt Land Parcels

# Assessment of Brockhill East Green Belt parcels against Green Belt purposes

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel A** | There is a significant gap between the existing adjacent Brockhill estate and the nearest settlements of Blackwell and Alvechurch.<br><br>This land parcel does not provide significant containment to the existing urban area of Redditch due to the most recent development at Wheelers Lane. The purposes of Green Belt within this land parcel have been undermined due to this adjacent land use.<br><br>The parcel does not 'round off' the existing built up area of Redditch due to the design of | Due to the location and design of the recent Brockhill development this parcel of Green Belt land is very sensitive to potential expansion of this site. This development has been designed without clear or strong boundaries and therefore this land parcel does not play a strong role is containing the existing urban form.<br><br>There is a weak tree belt to the north of the site which may provide some containment but not substantial.<br><br>There is a significant Green | Due to the location of the recent Brockhill development, this site is considered to be urban fringe. This parcel of land does not play a significant role in protecting the countryside from encroachment, and indeed further development may provide an opportunity to provide strong boundaries and to 'round off' the urban area more successfully in urban design terms. | 0/3 |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| | the adjacent development.<br><br>There are no major topographical areas or ridge lines within the land parcel. A weak tree belt is located at the northern boundary of the parcel (not protected).<br><br>This parcel does not significantly contribute to the strategic gap between Redditch and the Birmingham conurbation.<br><br>**Score = -** | Belt gap between Redditch and surrounding settlements. This land parcel does not play an important role in preventing settlements merging.<br><br>**Score = -** | **Score = -** | |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel B (B1 and B2)** | Parcel B1<br><br>There is a significant gap between the existing adjacent Brockhill estate and the next settlements of Blackwell and Alvechurch.<br><br>This land parcel does not provide significant containment to the existing urban area of Redditch. This parcel is closely interlinked with other adjacent Green Belt parcels (B2 and C1) and therefore in this context this land is dependant on adjacent land and the purpose served by these areas.<br><br>For ease the part of the land parcel that contains steep topography will be named and assessed under land parcel B2.<br><br>**Score = -** | Parcel B1<br><br>This parcel does not play a significant role in preventing Redditch merging with other settlements as there is a significant strategic gap between the existing urban area and the closest settlements.<br><br>**Score = -** | Parcel B1<br><br>Although this Green Belt parcel is not located adjacent to the built form of the town, the ridges within the land parcels adjacent to this land parcel (B2 and C2) contain the urban area well and provide excellent site boundaries and open countryside views from within the town. Therefore this land parcel in isolation does not safeguard the countryside from encroachment, this Green Belt purposes is fulfilled by other land parcels. This land parcel could be developed without undermining the role of the surrounding Green Belt.<br><br>**Score = -** | B1 – 0/3<br>B2 – 0/3 |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| | Parcel B2<br><br>This parcel in its entirety does not contribute towards restricting the sprawl of the built – up area. The steep topography to the north east portion of the land parcel provides this containment barrier, which does act to restrict the sprawl of the urban area and therefore should be retained. Development may be appropriate in some parts of this land parcel, but restricted to the lower areas.<br><br>**Score = -** | Parcel B2<br><br>The steep area to the north east of the land parcel plays a strategic role in retaining separate settlements as it acts as a natural boundary. The land parcel as a whole (with the exception of the mentioned boundary) does not contribute towards this role.<br><br>**Score = -** | Parcel B2<br><br>The natural steep areas to the north east of the site should be retained as Green Belt, as it fulfils this purpose. If the remaining area of this parcel were to be developed there may be potential for strong boundaries to be implemented. This land can be viewed from the existing Brockhill development but development would not appear to encroach the countryside due to the strong tree boundary to the north east boundary.<br><br>**Score = -** | |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel C (C1 and C2)** | Parcel C1<br><br>There is a significant gap between the existing adjacent Brockhill estate and the next settlements of Blackwell and Alvechurch. Due to the significant gap between settlements it is considered this parcel does not provide a significant degree of containment.<br><br>**Score = -** | Parcel C1<br><br>This parcel does not play a significant role in preventing Redditch merging with other settlements.<br><br>**Score = -** | Parcel C1<br><br>This parcel of land does not provide a strong barrier to the encroachment of the countryside. As it is adjacent to a potential development site it may be difficult to form a strong site boundary.<br><br>**Score = -** | C1 – 0/3<br>C2 – 0/3 |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| | Parcel C2<br><br>The north east portion of this parcel is extremely high and does provide a strong degree of containment, therefore this area should be retained as Green Belt; it is therefore this ridge which must be retained to fulfil this purpose. The less steep area could withstand development with this land parcel still containing the existing urban area successfully.<br><br>**Score = -** | Parcel C2<br><br>The steep area to the north east of the land parcel plays a strategic role in retaining separate settlements. The land parcel as a whole (with the exception of the mentioned boundary) does not contribute towards this role.<br><br>**Score = -** | Parcel C2<br><br>Due to the steep topography of this parcel of land there is a clear and strong barrier which would prevent the neighbouring development site encroaching onto this land parcel. However this is only the boundary to the north of the site, the remaining land parcel may be able to withstand development without appearing to encroach the countryside.<br><br>**Score = -** | |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel D** | The parcel of land is very prominent; this prominence provides a strong green boundary to the Redditch urban area.<br><br>There is a significant gap between Redditch and surrounding settlements, this Green Belt parcel visually provides this strong gap. The 'bowl' features also contains the urban area well and sets a clear boundary for the town. The steep topography 'rounds off' the urban area.<br>**Score = +** | This land parcel is particularly sensitive to the urban area, as the land parcel can be viewed clearly from the town. There is a limited relationship between this land parcel and the rest of the Green Belt because of the steep ridge line. This ridge line plays a significant role in preventing the towns merging into one another.<br><br>**Score = +** | This parcel of land is located adjacent to a potential development site, therefore in that context could be considered as urban fringe. However the setting has qualities of open countryside. Due to the prominent ridgeline the parcel provides a strong role in safeguarding the countryside from encroachment.<br><br>**Score = +** | 3/3 |

# Assessment of Brockhill West Green Belt against NPPF Green Belt purposes

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel A** | This parcel of land is located between existing development and the highway. This parcel of land does not provide a significant open gap between Redditch and any other settlements. This parcel of land does not have the quality of openness.<br><br>Development of this land would not alter the containment of the existing urban form of Redditch, due to its 'wedged' location between existing development and the highway.<br><br>Development of this gap would provide an opportunity to develop a strong urban form and increase the role played by the Green Belt to | This parcel of Green Belt land does not play a role in preventing Redditch merging with any other settlements due to its unique location (a wedge between existing development and the highway).<br><br>Development of this parcel of land would 'round off' the existing urban form.<br><br>There is no strategic role for this parcel of Green Belt land in relation to the wider Green Belt. This land does not contribute to successfully preventing settlements merging. | This land is considered to be urban fridge. This parcel of land is surrounded by existing development. In relation to the existing setting it is considered development here would not undermine the role of the wider Green Belt. | 0/3 |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| | the western edge of the parcel adjacent to existing development. Development at this location would 'round off' the existing built up area.<br><br>This wedge of land would not encourage sprawl due to its strong containment.<br><br>This site has strong defensible boundaries to allow containment of potential development including roads and existing development.<br>**Score = -** | **Score = -** | **Score = -** | |
| **Parcel B** | Development in this location would appear to sprawl along the highway as there are no strong boundaries and therefore no effective containment.<br><br>This parcel of land is not directly adjacent to the existing built up area of the town and therefore this land does contribute to retaining | This land parcel does not contribute towards keeping Redditch separate from other settlements as the parcel of land is so small and therefore does contribute not towards the strategic importance of the Green Belt between Redditch and other settlements. | This parcel of land could be considered as urban fringe due to its close proximity to the boundary of the urban area. As this parcel of land is isolated and bound by the highway and an access track development of this would not appear to encroach upon the countryside. | 1/3 |

| DRAFT BOROUGH OF REDDITCH LOCAL PLAN NO.4 – FEB 2013 Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| | the openness between Redditch and other settlements.<br><br>If development were to occur in this location it would be difficult to contain due to the lack of strong defensible boundaries.<br><br>**Score = +** | **Score = -** | **Score = -** | |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel C** | This parcel of land is adjacent to existing woodland and therefore its role as Green Belt land is affected by this, as this woodland is a permanent feature of the landscape. Due to the proximity to the woodland this parcel of land assists in restricting the sprawl of the adjacent residential development by presenting a clear strong boundary to the adjacent built form. Although there are strong boundaries to the north and west of the site (main roads) which would clearly limit development of this site, the woodland to the east and south of the site also contain the land parcel well. The site does round off the existing nearby residential development well.<br><br>**Score = +** | This parcel of land does not provide a strong role in preventing settlements merging as the site is bounded by strong boundaries to the north and west which achieve this role. Therefore if the site were to be developed there would be strong boundaries which would contain the site well and prevent the merging of settlements. Due to the low topography of this site it does not play a strategic role in retaining the gap between settlements.<br><br>**Score = -** | In Green Belt terms, this parcel of land does not provide a strong role in safeguarding the countryside from encroachment. The land parcel is bound by the road network which provides this strong boundary.<br><br>This parcel of land is considered to be urban fringe.<br><br>**Score = -** | 1/3 |

| DRAFT BOROUGH OF REDDITCH LOCAL PLAN NO.4 – FEB 2013 Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel D (D1 and D2)** | Parcel D1<br>This parcel of land has not been evaluated in Green Belt terms, due to steep topography and direct access necessary from the highway network it would not be viable to develop at this location.<br><br>Parcel D2<br>The existing road network successfully contains the Redditch urban area well and therefore the role of this land parcel to check unrestricted sprawl is achieved. However, if strong boundaries were to be created to the northern part of this parcel then it would be possible to allow development in this land parcel without sprawl occurring. The topography of this land parcel climbs towards the north west – towards Tack Farm and therefore development within this parcel of land could be | Parcel D2<br>As the existing road network provides a strong boundary to the urban area it is considered that this land successfully prevents merging of settlements. However, if strong boundaries could be created on the northern part of this land parcel then it would be possible to allow development in this land parcel without settlements merging. The topography of this land parcel climbs towards Tack Farm and therefore development within this parcel of land could be contained through restricting development on the steeper areas of land. This provides a natural containment barrier to this land parcel. The settlement of Tack Farm would not merge with development within this land parcel if development was restricted on the steep, north west aspects of the land. | Parcel D2<br>As there is potential to restrict development in the northern parts of this land parcel it is considered this land parcel does not contribute towards safeguarding the countryside from encroachment. Development could occur in this area without encroaching into the countryside.<br><br>Strong boundaries would need to be created to the north east section of this land parcel, as there are no naturally occurring strong boundaries in this area that align with the borough boundary, it may be more appropriate to allow further development (which would be outside of the Borough boundary) to allow suitable, strong boundaries to be selected. However, the future designations of land outside of the Borough boundary are | 0/3 |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| | contained through preventing development on the steeper areas of land, and thus achieving strong boundaries. This provides a natural containment barrier to this land parcel.<br><br>Strong boundaries would need to be created to the north east section of this land parcel, as there are no naturally occurring strong boundaries in this area that align with the borough boundary, it may be more appropriate to allow further development (which would be outside of the Borough boundary) to allow suitable, strong boundaries to be selected. However, the future designations of land outside of the Borough boundary are not the subject of this assessment.<br><br>**Score = -** | Strong boundaries would need to be created to the north east section of this land parcel, as there are no naturally occurring strong boundaries in this area that align with the borough boundary, it may be more appropriate to allow further development (which would be outside of the Borough boundary) to allow suitable, strong boundaries to be selected. However, the future designations of land outside of the Borough boundary are not the subject of this assessment.<br><br>**Score = -** | not the subject of this assessment.<br><br>**Score = -** | |

| DRAFT BOROUGH OF REDDITCH LOCAL PLAN NO.4 – FEB 2013 Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel E** | The existing urban area is very well contained by the road network. This land is also contained by land parcel D2 therefore many of the principles that apply to land parcel D2 also apply to land parcel E<br><br>If development were to occur at land parcel D2 (which is considered appropriate based the containment provided by steep topography) then the purposes of this Green Belt parcel are undermined. Development could occur at this land parcel without encouraging unrestricted sprawl of the built-up area.<br><br>**Score = -** | The existing urban area is very well contained by the road network. This land is also contained by land parcel D2 therefore many of the principles that apply to land parcel D2 also apply to land parcel E<br><br>If development were to occur at land parcel D2 (which is considered appropriate based the containment provided by steep topography) then the purposes of this Green Belt parcel are undermined. Development could occur at this land parcel settlements merging into one another.<br><br>**Score = -** | The existing urban area is very well contained by the road network. This land is also contained by land parcel D2 therefore many of the principles that apply to land parcel D2 also apply to land parcel E<br><br>If development were to occur at land parcel D2 (which is considered appropriate based the containment provided by steep topography) then the purposes of this Green Belt parcel are undermined. Development could occur at this land parcel without encroaching into the countryside.<br><br>**Score = -** | 3/3 |

| Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel F** | This parcel of land does not significantly contribute towards preventing the sprawl of the built up area. The track leading to Oxstalls Farm could be enhanced to provide a more significant and stronger boundary. It is considered this parcel of land is well contained by the track and therefore could be developed without undermining surrounding Green Belt land.<br><br>Due to the close proximity to the recent development from Brockhill Drive (including Lily Green Lane and Parklands Close) this parcel of Green Belt is weakened and therefore is may be more appropriate to enhance the existing weak boundary to make the containment of the area stronger.<br><br>**Score = -** | This parcel of land does not play a strategic role in preventing Redditch merging with other settlements. Therefore should this land parcel could be developed without undermining the strategic role.<br><br>**Score = -** | This parcel of land does not contribute significantly towards protecting the Green Belt from encroachment. It is considered that the track leading to Oxstalls Farm would provide a strong defensible boundary to this site which would allow the urban area to be better contained than at present.<br><br>This parcel of land has the characteristics of urban fringe rather than open countryside.<br><br>**Score = -** | 0/3 |

| DRAFT BOROUGH OF REDDITCH LOCAL PLAN NO.4 – FEB 2013 Green Belt Purposes | | | | |
|---|---|---|---|---|
| | **To check the unrestricted sprawl of large built-up areas** | **To prevent neighbouring towns merging into one another** | **To assist in safeguarding the countryside from encroachment** | **Total** |
| **Parcel G** | There is a strategic Green Belt gap between Redditch and surrounding settlements and this parcel of land does not significantly contribute towards this gap. There isn't a strong boundary to this site however a stronger boundary could be implemented if this site were to be developed concurrently with land adjacent, which is located in-between this Green Belt parcel and the track to Oxstalls Farm.<br><br>This parcel of land is adjacent to the built up area, which has not been completed in a comprehensive way. This parcel of land has the opportunity to 'round off' the urban form with further development.<br><br>**Score = -** | This parcel of land does not contribute significantly towards preventing Redditch merging with surrounding settlements. The location of the track leading to Oxstalls Farm would achieve this much better as this track has the opportunity to be stronger and provide a higher level of containment.<br><br>This site, should it be developed, has the opportunity to be well contained to the north, east and west by defensive road boundaries and the south by the existing Foxlydiate Wood.<br><br>**Score = -** | This land does not contribute significantly towards preventing the countryside from encroachment.<br><br>It is considered this land could 'round off' the built form of the urban area more successfully.<br><br>This parcel of land is considered to have characteristics of the urban fringe rather than open countryside.<br><br>**Score = -** | 0/3 |

### Summary of Assessment of Green Belt areas against Green Belt purposes

5.3 The previous table assesses each parcel of Green Belt land against the five purposes of Green Belt taken from the NPPF and adjusted to local circumstances for the purposes of this assessment. Following this detailed assessment the following commentary can be provided to indicate whether each parcel is recommended to be taken forward to the stage 2 assessment.

### Brockhill East

Parcel A

5.4 It is considered that the purposes that support the designation of this area of land as Green Belt are significantly undermined due to the close proximity and relationship of the recent adjacent Brockhill development. Therefore the Green Belt purposes of this area of land are now questionable. Due to the limited defensible boundaries this parcel of land, it is not well contained and does not round off the existing urban form successfully. For these reasons this parcel of land will be carried forward to the stage 2 assessment.

Parcel B1

5.5 Although this parcel of land does not provide a strong level of containment to the urban area, it does play a significant role in preventing Redditch merging with other settlements. It is considered that there are certain areas of this parcel of land that may be suitable for development without undermining the purposes of the Green Belt, for this reason this parcel of land will be carried forward for closer investigation to the stage 2 assessment.

Parcel B2

5.6 This parcel of land contains extremely steep topography which provides a strong containment boundary for the urban area and contributes towards the strategic role played by the Green Belt in keeping Redditch and other settlements separate. There may be some areas within this parcel of land that may be suitable for development without undermining the purposes of the Green Belt. This parcel of land will be carried forward for the stage 2 assessment to consider the potential there may be for development. It is also worth assessing whether this land parcel has the opportunity to be considered as local green space (in line with NPPF Paragraph 76 and 77).

Parcel C1

5.7 This parcel of land does not play a significant role in containing the existing urban area of Redditch. The fulfilment of the Green Belt purposes by this parcel of land may be undermined by the close proximity of the existing ADR particularly as the ADR is being developed, and planning permission granted to redevelop Lowans Hill Farm. It is considered that the purpose of the Green Belt in this area would not be significantly undermined, if it were to be

developed and therefore this parcel of land will be carried forward to the stage 2 assessment.

Parcel C2

5.8 This parcel of land contains steep topography which fulfils a number of the Green Belt purposes including checking the unrestricted sprawl of the urban area, preventing Redditch merging with any other settlements and safeguarding the countryside from encroachment. However, there are areas of this land parcel which could be developed without undermining the Green Belt purposes, therefore this parcel of land is will be carried forward to be assessed for the stage 2 assessment to examine this further.

Parcel D

5.9 This parcel of land plays a significant role in fulfilling all of the Green Belt purposes. In particular this parcel of land provides a strong boundary to the Redditch urban area. Due to the steep topography, this parcel of land can be seen from a number of key locations in and beyond the Borough. For these reasons this parcel of land will not be carried forward for a stage 2 assessment. Although this area of land is not considered suitable for built development purposes, it could be used for infrastructure purposes as infrastructure would still maintain the openness of the Green Belt.

### Brockhill West

Parcel A

5.10 Due to the location of this particular parcel of land, wedged between the highway and the urban area, its does not fulfil any of the Green Belt purposes. Therefore this land is being carried forward for a stage 2 assessment.

Parcel B

5.11 This parcel of Green Belt land significantly fulfils two of the Green Belt purposes. In particular this land makes a contribution to restricting the sprawl of the built up area and prevents Redditch merging with surrounding settlements. For these reasons this site is not being carried forward for a stage 2 assessment. The role of this land parcel should be reconsidered as part of a wider Green Belt study, which considers the Green Belt adjacent to Redditch Borough but in Bromsgrove District.

Parcel C

5.12 This parcel of land plays a key role in restricting the sprawl of the built up area. However, it does deliver the other purposes of the Green Belt and therefore it will be carried forward to the stage 2 assessment.

Parcel D1

5.13 This parcel of land has not been considered with regard to its value in delivering the purposes of the Green Belt due to its steep topography and the need for direct access to be taken from the highway, both of these issues make the site unviable as a development site and therefore it this land is not being taken forward to the stage 2 assessment.

Parcel D2

5.14 This parcel of land does play a significant role in preventing Redditch edging closer to other settlements and potentially merging, in addition this land safeguards the countryside from encroachment. However this land can be well contained by the steeper slopes that exist to the north west of the site. This topography provides natural barriers to containment, therefore if development were to occur in this area the potential for sprawl is minimal. However, there are very limited boundaries to the north east of the site and it would only be suitable for this land to come forward for development in Green Belt terms if suitable, permanent Green Belt boundaries could be selected. This land should be considered as part of a wider Green Belt review as there may be potential for stronger, more defensible Green Belt boundaries to be selected in the wider area (however this is not considered any further in this study). As this land does have some development potential is not suitable to take forward to the stage 2 assessment.

Parcel E

5.15 This parcel of land is very closely related to land parcel D2. As D2 may be suitable for development (subject to the definition of clear, defensible Green Belt boundaries), it is appropriate to take forward land parcel E for further examination. There are strong boundaries to this land parcel located to the south and south east of the side, with limited boundaries to the north and north east, As above (in relation to land Parcel D2) as this land does not have clear strong defensible boundaries if it were to be considered as part of a wider Green Belt review there may opportunities to potential to select allow stronger, more defensible Green Belt boundaries, which could in turn allow the release of some of the land for development purposes without undermining the Green Belt as a whole. Therefore it is considered appropriate to take this land parcel forward to the stage 2 assessment.

Parcel F

5.16 This site does not significantly contribute towards the purposes of the Green Belt, in addition due to the close proximity of this site to the existing urban area, and that this site has strong defensible boundaries it is considered appropriate to take this land forward for further consideration in the stage 2 assessment.

Parcel G

5.17 This site does not significantly contribute to the purposes of the Green Belt, in addition due to the close proximity of this site to the existing urban area, and that this site has strong defensible boundaries it is considered appropriate to take this land forward for further consideration in the stage 2 assessment.

5.18 In conclusion the following site will be taken forward for a stage two assessment:

| Brockhill East | Brockhill West |
|---|---|
| Parcel A | Parcel A |
| Parcel B1 | Parcel C |
| Parcel B2 | Parcel D2 |
| Parcel C1 | Parcel E |
| Parcel C2 | Parcel F |
| | Parcel G |

## 6. Stage 2 Site Constraints Identification

6.1 This stage of the assessment will examine the relevant Green Belt parcels against other potential constraints which must be assessed before development could be considered in these locations including environmental designations such as open space and local nature reserves.

## Brockhill East Green Belt Site Constraints

### Landscape character

6.2 The whole of the Brockhill East site is considered to be highly sensitive to development through the Worcestershire County Council Landscape Character Assessment Landscape Sensitivity Map. However, this does not render the area totally undevelopable; but must be considered when assessing the appropriateness of the individual land parcels for development. The Worcestershire County Council Landscape Character Assessment will be used in further detail when considering each individual land parcel.

6.3 The Worcestershire County Council Landscape Character Assessment classifies the whole area as a Wooded Estateland landscape character type. This is a large scale, wooded agricultural landscape of isolated brick farmsteads, clusters of wayside dwellings and occasional small estate villages. Some of the key characteristics of this landscape type are large discrete blocks of irregularly shaped woodland and mixed farming land use.

6.4 These landscapes generally have a clustered settlement pattern of wayside dwellings or estate villages. Isolated farmsteads are also a feature. New development would be appropriate if it is in accordance with policy but it must be carefully sited in order to protect the visual integrity of the estate villages.

6.5 As stated above this land parcel is categorised in the Worcestershire Landscape Character Assessment (LCA) as being a Wooded Estatelands landscape type. The Settlement Pattern of the Wooded Estatelands generally has a clustered settlement pattern of wayside dwellings or estate villages. Isolated farmsteads are also a feature. The study states that new development would be appropriate if it is in accordance with policy (detailed below) but it must be carefully sited in order to protect the visual integrity of the estate villages.

6.6 There are a number of guidelines put forward by the LCA (see 'The landscapes of Worcestershire landscape type advice sheet (land management wooded estatelands'). These guidelines states that the following principles should be applied when considering this landscape character type:

- Conserve all ancient woodland sites and restock with locally occurring native broadleaved species favouring oak as the dominant species and relate to the scale and spatial pattern of the Landscape Type. New large scale woodland planting can reflect ancient characteristics in terms of

shape/outline and species composition. In this landscape, the woodlands are characteristically very large, of ancient semi-natural character and irregular, or semi-regular outline so new planting should reflect this. There may also be opportunities to restore areas of ancient woodland through the introduction of appropriate management, or the removal of alien species and appropriate replanting

- Conserve and restore the hedgerow pattern, particularly primary hedgerows and hedgerow tree cover and seek to ensure hedgerow linkage to all woodland blocks, for visual cohesion and wildlife benefit. The species composition of existing long established hedgerows should guide the composition of new hedgerow planting.

- Seek to ensure hedgerow linkage to all woodland blocks, for visual cohesion and wildlife benefit.

- Conserve and restore parkland including historically correct ornamental planting and with an emphasis on arable reversion. Opportunities should be particularly sought to reunite the original scale and conceptual framework of parkland areas, by encouraging the conversion of arable land back to permanent pasture. New generations of tree planting can be encouraged to perpetuate the parkland character, together with the restoration of other ornamental plantings, garden buildings and water features.

- Conserve the integrity of estate villages and their associated tree cover.

6.7 These guidelines do not restrict development within these landscape areas however they must be thoroughly considered and incorporated when planning new development.

### Agricultural Land Classification

6.8 The Natural England agricultural land classification designates the whole area as either Grade 3a, 3b or 3c. Grade 3 is generally considered to be good to moderate quality agricultural land (a being the best and c being the worst). These designations again do not render the sites undevelopable but must be considered in further detail when looking at the individual land parcels.

6.9 Natural England Guidance (Technical Information Note TIN049) states that the purpose of the Agricultural Land Classification is to protect the best and most versatile agricultural land. Where significant development of agricultural land is unavoidable, poorer quality land should be used in preference to that of higher quality, except where this would be inconsistent with other sustainability considerations, the decision to use agricultural land rests with planning authorities. In addition to the above constraints, the following specific constraints are applicable to each land parcel.

### Parcel A

Existing Infrastructure

6.10 Over one third of this land parcel is protected by a Gas Pipeline Exclusion Zone, the gas pipeline runs from the north east of the site to the south west, across the top portion of the land parcel. This would only allow two thirds of the site to be suitable for development, as it is not possible to allow development within the exclusion zone.

Community Woodland

6.11 The whole land parcel is designated as community woodland, which was established as a result of previous development in the area. This community woodland is required to remain in place in perpetuity.

Open Space

6.12 This site is covered by the Local Plan No.3 designation of Policy R.1 Primarily Open Space. Open space should not be developed (in accordance with this policy) unless it can be demonstrated that the need for the development outweighs the value of the land as an open area.

Agricultural Land Classification

6.13 This parcel of land is classified under the Agricultural Land Classification as Grade 3a and 3b. Grade 3a covers the very north east portion of the land parcel and Grade 3b covers the remaining site. The very north east boundary is partially covered by Grade 3c agricultural land. This land is considered to be good to moderate quality.

Air Pollution

6.14 An air pollution constraint covers the south east portion of the site. This is not a constraint which would prohibit development but would need to be considered when planning new development, with a view to minimise air pollution.

Conclusion

6.15 In conclusion due to the constraints detailed above (in particular the community woodland) it would not be appropriate to use land parcel A for development purposes.

### Parcel B1 and B2

Existing Infrastructure

6.16 The Gas Pipeline Exclusion Zone runs across the top corner of these land parcels, from the northwest boundary to the north east boundary. The exclusion zone covers approximately half of this area. It is not appropriate for

development to occur within the exclusion zone and therefore although development can occur outside of the exclusion zone. Development to the north of the exclusion zone may appear to be isolated and unrelated to the rest of the strategic site. Therefore it may be more appropriate for development to be located to the north of the exclusion zone it may be more visually acceptable to allow further development to be expanded further north (which is land that is outside of the Borough Boundary) to allow for a comprehensive development scheme. This option should be considered as part of a wider Green Belt study.

Air Pollution

6.17 An air pollution constraint covers the south east portion of the site. This is not a constraint which would prohibit development but would need to be considered when planning new development, with a view to minimise air pollution.

Agricultural Land Classification

6.18 This parcel of land is classified under the Agricultural Land Classification as Grade 3a and 3b. Grade 3a covers the north east portion (approximately half) of the land parcel. Grade 3c covers a linear section from the north west boundary to the eastern boundary. Grade 3b covers a small portion of the south west part of the site. This land is considered to be good to moderate quality.

Conclusion

6.19 In conclusion although the agricultural land classification details that this land parcel contains land of good quality. It may still be appropriate for development. The gas exclusion zone does place a large constraint of the development of this whole land parcel, with the area to the south of the exclusion zone being more appropriate for development that north. As stated above it may be more suitable to expand development to the north of the exclusion zone to prevent it from appearing fragmented from the remaining strategic site. This option should be considered as part of a wider Green Belt study.

### Parcel C1 and C2

Air Pollution

6.20 An air pollution constraint covers the whole of this land parcel. This is not a constraint which would prohibit development but would need to be considered when planning new development, with a view to minimise air pollution.

Agricultural Land Classification

6.21 This parcel of land is classified under the Agricultural Land Classification as Grade 3a and 3b. Grade 3a covers the north east portion (approximately half)

of the land parcel. Whist Grade 3b covers the north east portion of the site. This land is considered to be good to moderate quality.

Conclusion

6.22 There are few constraints to these land parcels and therefore it is considered appropriate for development.

## Brockhill West Green Belt Site Constraints

### Landscape Character

6.23 The Worcestershire landscape character assessment classifies the land parcels north of Brockhill Drive (land parcels D2, E, F and G) as Wooded Estateland and the land parcels to the south of Brockhill Drive and east of Hewell Lane (B4096) as Principle Timbered Farmlands (these are land parcels A and C). (For information on Wooded Estateland see information under Brockhill East Landscape Character).

6.24 Principal Timbered Farmlands are rolling lowland landscapes with occasional steep sided hills and low escarpments. They have a small scale, wooded, agricultural appearance characterised by filtered views through densely scattered hedgerow trees. These are complex, in places intimate, landscapes of irregularly shaped woodlands, winding lanes and frequent wayside dwellings and farmsteads. The key primary characteristics of this landscape type include notable patterns of hedgerow trees, predominantly oak, hedgerow boundaries to fields and ancient wooded character.

6.25 This landscape type does not prevent development in this area; however, there are recommended landscape guidelines which must be considered when formulating development proposals. These include:

- Maintain the tree cover character of hedgerow oaks, and enhance the age structure of the hedgerow oak population.
- Conserve all ancient woodland sites and restock with locally occurring native species.
- Seek to bring about coalescence of fragmented relic ancient woodlands.
- Encourage the planting of new woodlands, reflecting the scale, shape and composition of the existing ancient woodland character, favouring oak as the major species.
- Conserve and restore tree cover along water courses and streamlines.
- Seek opportunities to enhance tree cover along highways and other non-farmed locations.
- Conserve and restore the pattern and composition of the hedgerow structure through appropriate management, and replanting.
- Conserve the organic pattern and character of the lane networks.

- Maintain the historic dispersed settlement pattern.

6.26 Worcestershire County Council state in the LCA that additional individual dwellings could be accommodated within the dispersed settlement pattern as long as they do not occur in sufficient density to convert the pattern to wayside or clustered status. Modern development favouring groups or clusters of new houses would not be appropriate in this landscape.

6.27 It is vital for the retention of landscape character that the organic pattern of enclosure is preserved and that a geometric pattern is not superimposed by subdividing fields or enlarging others and employing straight fence or hedgelines.

6.28 There is scope for additional small-scale woodland planting but large scale planting or linking up existing fragmented woodlands to form large blocks would not be appropriate.

### Parcel A

Borehole protection

6.29 This area is covered by Borehole protection area. A large area of built development within Redditch is covered by this existing constraint and therefore it is not considered that this constraint prevents development from occurring. However, this designation must be fully investigated before any development is permitted to ensure that any necessary considerations are factored into potential development schemes.

Sand and Gravel Deposits

6.30 The imported sand and gravel area runs across the north west of this land parcel. These sand and gravel deposits must be fully investigated before any development proposals are permitted to ensure that any necessary considerations are factored into development schemes.

Landscape Character

6.31 The Worcestershire landscape character assessment classifies this parcel of land as principle timbered farmland (see information detailed under 'Landscape Character').

Conclusion

6.32 There are no significant constraints to prevent the development of this land parcel. Therefore, is it considered appropriate to put this land forward for development.

### Parcel C

Borehole protection

6.33 This area is covered by a Borehole Protection Area. A large area of built development within Redditch is covered by this existing constraint and therefore it is not considered that this constraint prevents development from occurring. However, this designation must be fully investigated before any development is permitted to ensure that any necessary considerations are factored into development schemes.

Local Nature Reserve

6.34 This land parcel is covered by the Foxlydiate Wood Local Nature Reserve. This 12Ha LNR contains semi-natural woodland and some areas of conifer plantation. This LNR has rich and diverse flora.

Sand and Gravel Deposits

6.35 The imported sand and gravel area runs across the north west portion of this land parcel. These sand and gravel deposits must be fully investigated before any development proposals are permitted to ensure that any necessary considerations are factored into development schemes.

Landscape Character

6.36 The Worcestershire landscape character assessment classifies this parcel of land as principle timbered farmland (see information detailed under 'Landscape Character').

Conclusion

6.37 This land parcel is designated as the Foxlydiate Wood Local Nature Reserve. This designation development and therefore it is not appropriate to allocate this land parcel for development.

### Parcel D2

Borehole protection

6.38 This area is covered by a Borehole protection Area. A large area of built development within Redditch is covered by this existing constraint and therefore it is not considered that this constraint prevents development from occurring. However, this designation must be fully investigated before any development is permitted to ensure that any necessary considerations are factored into development schemes.

Groundwater Source Protection Zone (SPZs)

6.39 This Environment Agency designation is in close proximity to this land parcel. The SPZs show the risk of contamination from any activities that might cause pollution in the area, the closer the activity, the greater the risk. There are three main zones (inner, outer and total catchment). The zone closest to the

land parcel is the outer zone. This designation does not prevent development form occurring but must be a consideration when planning for development.

Existing Infrastructure

6.40 The Gas Pipeline Exclusion Zone runs across the top corner of these land parcels, from the north west boundary to the north east boundary. The exclusion zone covers approximately half of this area. It is not appropriate for development to occur within the exclusion zone and therefore although development can occur outside of the exclusion zone. Development to the north of the exclusion zone may appear to be isolated and unrelated to the rest of the strategic site. Therefore it may be more appropriate for development to be located to the north of the exclusion zone it may be more visually acceptable to allow further development to be expanded further north (which is land that is outside of the Borough Boundary) to allow for a comprehensive development scheme. This option should be considered as part of a wider Green Belt study.

Landscape Character

6.41 The Worcestershire landscape character assessment classifies this parcel of land as Wooded Estatelands (see information detailed under 'Landscape Character').

Conclusion

6.42 There are no significant constraints to prevent the development of this land parcel. Therefore, is it considered appropriate to put this land forward for development.

### Parcel E

6.43 This area is covered by a Borehole protection area. A large area of built development within Redditch is covered by this existing constraint and therefore it is not considered that this constraint prevents development from occurring. However, this designation must be fully investigated before any development is permitted to ensure that any necessary considerations are factored into development schemes.

Landscape Character

6.44 The Worcestershire landscape character assessment classifies this parcel of land as Wooded Estatelands (see information detailed under 'Landscape Character').

Conclusion

6.45 There are no significant constraints to prevent the development of this land parcel. Therefore, is it considered appropriate to put this land forward for development.

### Parcel F

Borehole protection

6.46 This area is covered by a Borehole Protection Area. A large area of built development within Redditch is covered by this existing constraint and therefore it is not considered that this constraint prevents development from occurring. However, this designation must be fully investigated before any development is permitted to ensure that any necessary considerations are factored into development schemes.

Sand and Gravel Deposits

6.47 The imported sand and gravel area runs across the north west portion of this land parcel. These sand and gravel deposits must be fully investigated before any development proposals are permitted to ensure that any necessary considerations are factored into development schemes.

Landscape Character

6.48 The Worcestershire landscape character assessment classifies this parcel of land as Wooded Estatelands (see information detailed under 'Landscape Character').

Conclusion

6.49 There are no significant constraints to prevent the development of this land parcel. Therefore, is it considered appropriate to put this land forward for development.

### Parcel G

Borehole protection

6.50 This area is covered by a Borehole Protection Area. A large area of built development within Redditch is covered by this existing constraint and therefore it is not considered that this constraint prevents development from occurring. However, this designation must be fully investigated before any development is permitted to ensure that any necessary considerations are factored into development schemes.

Sand and Gravel Deposits

6.51 The imported sand and gravel area covers the north west boundary of this land parcel. These sand and gravel deposits must be fully investigated before any development proposals are permitted to ensure that any necessary considerations are factored into development schemes.

Community Woodland

6.52 The whole land parcel is designated as community woodland, which was established as a result of previous development in the area. This community woodland is required to remain in place in perpetuity.

Landscape Character

6.53 The Worcestershire landscape character assessment classifies this parcel of land as wooded estatelands (see detail relating to Brockhill East Green Belt Landscape Character for further information).

Conclusion

6.54 This land parcel is designated as Community Woodland, which must remain in perpetuity. Therefore it is not appropriate to allocate this land parcel for development.

# 7. Conclusions

7.1 This study considered whether two areas of Green Belt land within Redditch may be suitable to accommodate potential development. For ease of assessment each Green Belt area was split into smaller Green Belt parcels. Each Green Belt parcel was first judged against the five Green Belt purposes detailed in the National Planning Policy Framework and adapted to local circumstances. The Green Belt parcels that were not deemed to fulfil any of the Green Belt purposes were taken forward for further detailed assessment. Each Green Belt parcel was assessed by looking at the local constraints that affect the area as this may determine whether each parcel may, or may not, be suitable for development.

7.2 It is important to note that whilst this study has sought to be comprehensive with regard to local constraints there are projects still on-going which are not yet complete. These would need to be considered alongside these conclusions, for example work has not yet been completed on the potential impacts from wider historic designations within Bromsgrove District, particularly from the Hewell Grange Registered Park and Garden. This work is being completed as part of a wider Green Belt review and will inform the conclusions of this study at a later stage around the Brockhill West area. This study is a 'snap-shot' in time and seeks to inform emerging Background Evidence and Policy formulation.

### Brockhill East

7.3 The Green Belt area of Brockhill East was split into six land parcels. Through the first stage of the assessment one land parcel (D) was deemed to fulfil several of the Green Belt purposes and was not carried forward to the stage 2 part of the assessment. Five of the land parcels in Brockhill East were carried forward for the second part of the assessment. These were land parcels A, B1, B2, C1 and C2. At this stage it was considered that land parcels B2 and C2 contain very steep areas of land which should not be developed upon. Therefore although there may be some areas within land parcels B2 and C2 which could be capable of development, this must be on lower ground, designed sympathetically to the surrounding area and not undermining the purposes of the surrounding Green Belt.

7.4 The second stage of the assessment considered all of the constraints that are applicable to each land parcel. With regard to land parcel A, this land parcel is designated as community woodland. This designation would prevent any development occurring on this land parcel as this designation must remain in perpetuity. Therefore this parcel is not considered suitable for development.

7.5 Land parcel B1 and B2 were considered against the all constraints and the main constraints that apply to these land parcels is the gas exclusion zone. This pipeline places a constraint to development within these land parcels, in particular the area to the south of the exclusion zone is more appropriate for development than the north. However, with regard to land parcel B1, in this instance is may be suitable to expand development to the north of the exclusion zone (into Bromsgrove District) to prevent development in Redditch Borough from appearing fragmented from the remaining developable area.

However, due to the limitations of this study, assessment of land is only focussed on the administrative area of Redditch and therefore land outside of the Borough Boundary has not been assessed in this study. However from brief consideration of this land it would appear that this land, in Green Belt terms, may be considered suitable for development, without harm to the Green Belt. Land parcel B2 contains high ridge lines at the north east area and this area does contribute towards Green Belt purposes. Therefore development should not occur in the high steep sections of this area. It may be more appropriate for this area to be considered as Local Green Space (as detailed in the NPPF).

7.6 There were no constraints identified for land parcel C1 and C2. However, as for B2, land parcel C2 contains high ridge lines in the north east area and this area does contribute towards Green Belt purposes. Therefore development should not occur in the steep sections of this area. It may be more appropriate for this area to be considered as Local Green Space (as detailed in the NPPF).

7.7 Therefore, in summary there are two land parcels that could be fully released from the Green Belt in this area in their entirety and contribute towards meeting development needs. These are land parcels B1 and C1. Two land parcels could be partially released from the Green Belt to contribute towards meeting development requirements these are land parcels B2 and C2. Land parcel D would not be appropriate for development as it fulfils Green Belt purposes but may be appropriate to accommodate some infrastructure requirements.

### Brockhill West

7.8 The Green Belt area of Brockhill West was split into eight land parcels. Through the first stage of the assessment one land parcel (B) was deemed to fulfil several of the Green Belt purposes and therefore was not carried forward to the stage 2 assessment. Land parcel D1 was not carried forward as it was deemed unviable to develop this site and therefore there would have been no merit in assessing it further.

7.9 Six of the land parcels in Brockhill West were carried forward for the second part of the assessment, which considered all constraints applicable to each land parcel. These were land parcels A, C, D2, F and G. The second stage assessment considered all of the constraints that are applicable to each land parcel.

7.10 Land parcel A had no restrictions which would prevent development and therefore it is considered appropriate for this land to be released from Green Belt to accommodate some development needs.

7.11 Land parcel C is designated as Foxlydiate Wood Local Nature Reserve and therefore is not appropriate for development purposes as this designation is locally important for environmental reasons, therefore this land should remain as Green Belt.

7.12 Land parcel D2 had no known local constraints that would relevant development occurring in this area. However, there are areas of land within

this land parcel which are not suitable for development due to steep topography. Therefore development should not occur in the steep sections of this area. It may be more appropriate for this area to be considered as Local Green Space (as detailed in the NPPF). However, for development to be acceptable in this area it is important that appropriate and defensible boundaries are identified to the northern area of this land parcel. It may be appropriate in this instance for boundaries to be identified that are outside of the Borough boundary to allow for a more suitable and contained development area (however this is outside of the remit of this study).

7.13 Land parcel E has no local constraints that would prevent development from occurring on this site. However, this land parcel is closely related to land D2 and therefore as land parcel D2 is considered suitable for development this undermines the role of the Green Belt purposes of land parcel E. It is considered that subject to the development of land parcel D2 (not withstanding the need to identify appropriate and defensible Green Belt boundaries), land parcel E could come also forward for development without undermining the purposes of the Green Belt.

7.14 Land parcel F does not have any constraints that would prevent the site from being released from the Green Belt for development.

7.15 Land Parcel G is designated as Community Woodland which must remain in perpetuity; therefore this land parcel has no development potential and should remain as Green Belt.

### Overall conclusions

7.16 With regard to Brockhill East there are two land parcels that could be fully released in their entirety from the Green Belt in this area and contribute towards meeting development needs. These are land parcels B1 and C1. There are also two land parcels could be partially released from the Green Belt to contribute towards meeting development requirements. These are land parcels B2 and C2. The release of these land parcels should be sensitive to the topographical features of the area, with development being restricted to lower ground. Development should not occur on higher ground as it would be too visually prominent from elsewhere, and therefore appear to impinge upon the Green Belt. Land parcel D is not appropriate for development as it serves Green Belt purposes, however it may be appropriate to accommodate some infrastructure requirements on this land. Land parcel A are not appropriate for development due to local designation constraints.

7.17 With regard to Brockhill West there are four land parcels that could be fully released in their entirety from the Green Belt in this area and contribute towards meeting development needs. These are land parcels A, D2, E, and F. Land Parcels D2 and E should only be released if it is deemed appropriate to consider land wider than this Green Belt parcel for development and ensuring that appropriate and defensible Green Belt boundaries can be identified. Land parcel B is not appropriate for development as it serves Green Belt purposes. Land parcel D1 is not appropriate for development as it is not physically viable to develop. Land parcel C and G are not appropriate for development due to local designation constraints.

7.18 In conclusion this study has identified that there some parcels of land at Brockhill East and West that are suitable for development and therefore can be removed from the Green Belt.