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Development Plan Document

# Revised Development Strategy for the Emerging Core Strategy Consultation Paper

February - March 2010

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## 1. Introduction

This document has been produced to provide more detailed background information to the Redditch Growth Options consultation leaflet. The information contained here relates only to the proposed development sites *within* Redditch Borough. Despite cross-boundary working, Bromsgrove District and Redditch Borough Councils are preparing two separate Core Strategies and are at different stages of production with Redditch Borough Council further in the preparation of its Core Strategy, having previously consulted on draft policies. Due to the disparity between the progress of the two Core Strategies, the options presented in the consultation leaflet differ for each authority area. While Redditch Borough Council is presenting a preferred development strategy and the preferred location of major development sites, Bromsgrove District Council is presenting a range of options to accommodate the cross-boundary growth.

The Panel Report following the Examination of the West Midlands Regional Spatial Strategy Phase 2 Review was published in September 2009. The recommendations in this report state that the housing target for Redditch Borough up to 2026 should be 7,000 dwellings, of which 4,000 should be accommodated within Redditch and the remaining 3,000 in Bromsgrove District but adjacent to Redditch. Similarly, the target for employment land set for Redditch Borough has been divided between the neighbouring local authority areas. The total target for Redditch Borough is 68ha, of which 31ha is to be provided within the Borough, 12ha in Stratford-on-Avon District and the remaining 25ha in Bromsgrove District.

Bromsgrove District Council and Redditch Borough Council are holding a joint consultation in February and March of 2010 to consult on the options for accommodating the prescribed development. The purpose of this document is to provide a detailed background and rationale for the development options for the growth that is to be accommodated *within* Redditch (i.e. 4,000 dwellings and 31ha of employment land).

It has long been acknowledged that the development capacity of Redditch is limited, hence the need to accommodate some of Redditch's growth cross-boundary. At the Preferred Option stage of the RSS review, Redditch Borough Council argued for a lower housing target within Redditch, based on evidence in the Stage 2 'Study into the Future Growth Implications of Redditch' (WYG, January 2009). At the Preferred Draft stage of the Core Strategy a residential capacity of around 2,400 was identified within Redditch (SHLAA, March 2009). This capacity was informed by evidence in the Stage 2 WYG study that the land designated as 'Areas of Development Restraint' within Redditch were less preferable for development than areas of Green Belt in Bromsgrove District. The evidence from the Stage 2 WYG Study and the Redditch SHLAA formed the basis of the Preferred Draft Core Strategy draft policies (9th May – 22nd October 2008). However, this argument and the supporting evidence were not accepted by the RSS Inspectors, who, instead, determined an allocation of 4,000 dwellings to be accommodated within Redditch. It is therefore necessary to change the development strategy for Redditch Borough and consult on the option now proposed in order to progress the Borough of Redditch Core Strategy.

A number of options to accommodate the development in Redditch Borough have been considered and, based on the evidence available and the accompanying Sustainability Appraisal, some options have been discounted (more detail below). As a result of the limited realistic alternative options available within the Borough, this consultation presents a suggested Development Strategy policy for the Core Strategy, presented in part 2 of this document.

Part 3 of this document considers the major sites within Redditch Borough that will be required to meet the target of 4,000 dwellings; namely the three designated Areas of Development Restraint and two parcels of Green Belt to the northwest of the Borough. These major development sites would accommodate around half of the required 4,000 dwellings and a small amount of employment land. The remaining housing and employment development requirements can be accommodated on Brownfield and Greenfield sites within existing settlements in the Borough. These sites are identified in the Strategic Housing Land Availability Assessment (SHLAA) and Employment Land Review (ELR). There is also detail on the site known as 'Land to the Rear of the Alexandra Hospital' (a greenfield site within Redditch). This site has previously been consulted on as a Core Strategy Strategic Site for employment use; however it is now necessary to consider the site for residential development also. For each site the following information is given:

- Site location and description
- Planning Policy History including;
  previous planning policy designations, Core Strategy Issues and Options and Preferred Draft documents, Consultation responses and the associated Sustainability Appraisals
- Core Strategy Evidence Base documents including;
  Strategic Housing Land Availability Assessment (SHLAA, March 2009), Employment Land Review (ELR, March 2009), Strategic Flood Risk Assessment (SFRA, February 2009), Water Cycle Strategy (WCS, February 2009), Joint Study into the Future Growth Implications of Redditch Town to 2026 (WYG1, December 2007), Study into the future growth implications of Redditch – Second Stage Report (WYG 2, January 2009), A study of Green Belt Land & Areas of Development Restraint within Redditch Borough (October 2008), Worcestershire Landscape Character Assessment (2004)
- Development Options Sustainability Appraisal
- Site Potential
- Main Pros and Cons of Development

The remaining sections of this document cover the following:

Parts 4 and 5 give justification for releasing the ADRs and Green Belt land for development.

Part 6 details the options that have been considered and discounted, and the final section demonstrates how flexibility has been worked into the preferred approach to the development strategy in order to deal with potential changing circumstances.

## 2. The Draft Policy

The Preferred Draft Core Strategy presented draft Policy SP.2 'Development Strategy' which set out a broad brush approach to how development would be accommodated within Redditch Borough.

Taking account of the need to revise the way in which Redditch Borough delivers its housing and employment to meet the West Midlands RSS Phase Two Review targets, it is necessary to update the policy regarding Redditch Borough's development strategy. The revised policy is outlined on the following page.

As part of this consultation regarding development options in Redditch, the Council would like to know what you think about the way in which the re-drafted Policy aims to distribute development around Redditch. Details on how you can be involved in the consultation process can be found at the end of this document.

The policy considers the distribution of development in Redditch and there are a number of reasons for the details and principles included in this redraft. Firstly, Strategic Sites are identified for development. These sites are important in helping the Council to achieve central aspects of the vision for the Borough, such as urban regeneration of the town, diversification of the economic base, vibrant centres, attractive facilities, as well as delivery of Redditch's challenging development requirements.

It is recommended that the policy should bring forward all development within and adjacent to Redditch, as the main settlement in the Borough, immediately. This recommendation is based on reasons including: the unique economic conditions which require Local Authorities such as Redditch to quickly recover and deliver development to meet its needs (RSS Panel Report, Paragraph 4.6); the fact that there are no major constraints to delivery of the development in Redditch that would warrant phasing; the priority for Previously Development Land accompanied by a proactive approach to bring forward town centre and district centre sites which would deliver many of Redditch's brownfield dwellings; and the limited land availability meaning there is little choice about the locations for development.

The draft policy is presented on the next page.

**Distribution of Development**

**All Strategic Sites for development can come forward immediately in accordance with the policies in the Development Plan.**

**With regard to residential development, the most sustainable sites must be developed earlier in the Core Strategy period in accordance with Policy SS1. Sites include brownfield, greenfield and extensions to the urban area at:**

- **Former A435 By-pass corridor, East of Redditch;**
- **North East of Brockhill;**
- **Foxlydiate, West of Brockhill;**
- **South West of Webheath.**

**In all cases, the suitability of sites to be brought forward for development will be tested against the provisions of Policy SC7 – Infrastructure to ensure compliance with the objectives of the core strategy.**

**Should the required rates of housing delivery not be achieved, other processes available for use by the Council can be implemented in order to bring forward sites.**

**Development permissions will be monitored to determine when development in neighbouring authorities can be brought forward. Broad locations for this development are identified in Bromsgrove District Council's and Stratford-on-Avon District Council's Core Strategies.**

## 3. Major Development Sites

### 3a. A435 Area of Development Restraint

**Site location and description**

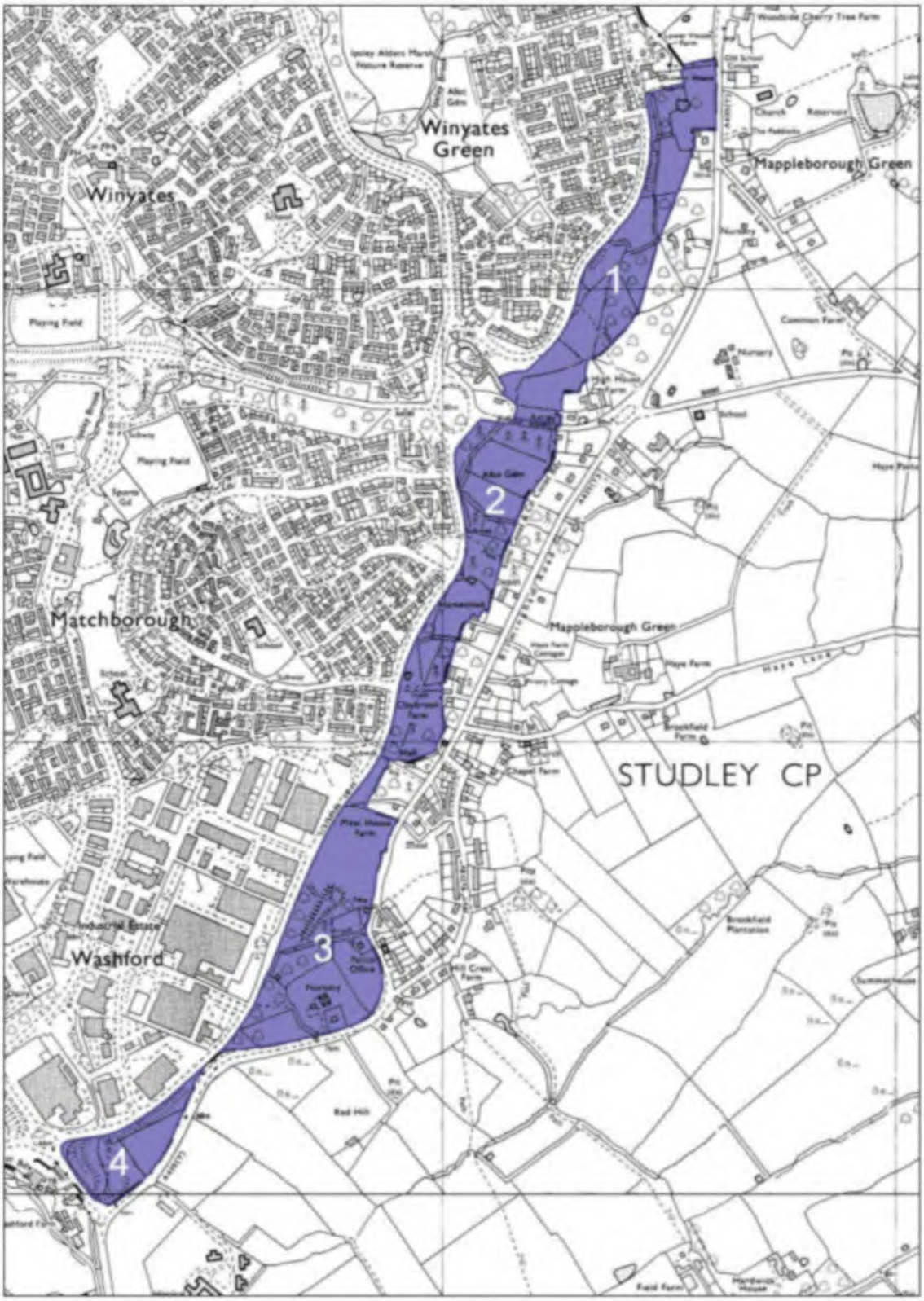
The A435 Area of Development Restraint is a linear site located in the east of the Borough (see plan overleaf). The site abuts the Borough boundary with Stratford-on-Avon District to the east, and to the west it is bounded by Far Moor Lane and Claybrook Drive. The ADR is approximately 33ha in size.

Due to the linear nature of the site, the topography and landscape features vary, so for the purposes of this description the ADR is split into 4 plots of land (identified as plots 1-4 on the map above). An Area Tree Preservation Order covers the whole site, although the Order only protects those trees that were on site at the time the Order was made. It is recommended that surveys are undertaken to evaluate the importance of breeding birds, badgers, and bats on this site.

Land to the west of plots 1 and 2 is predominantly in residential use, whilst to the east, the land adjacent to the A435 is generally rural in character. Both plots are relatively flat, with sections of tree planting and open parcels of land making these areas suitable for development, without substantially hindering existing landscape features. Several streams and ponds exist within the plot area, so there is the potential for the presence of Great Crested Newts. Evidence of water vole activity has been noted in one of the streams, as well as a badger sett outside the plot areas to the east of the site. A tarmac public footpath crosses the plot area in a west/easterly direction. Allotments exist at the top of plot 2 with vehicular access off Claybrook Drive.

Land to the west of plot 3 is predominantly industrial and commercial use, whilst to the east of the site, the area adjacent to the A435 is generally rural in character and includes the village of Mappleborough Green. Plot 3 also has substantial areas of tree planting, including Poplar plantations, and is generally well screened with established tree planting, some of which are important landscape screens. Several streams exist within the plot area and evidence of water vole activity has been noted in one of the streams. The site is elevated, and, in particular, as a result of earth mounds that exist in the middle of the site, is substantially elevated in relation to the A435. This area of the plot consists of an informal footpath through the site that is used by local residents.

Plot 4 is located to the south of Claybrook Drive. Land to the north of the plot is predominantly industrial and commercial, whilst to the east/south/west of the plot, the area is generally rural in character. Although tree planting areas exist on the site, there is a section of the site that is open land, relatively level, and elevated in relation to the A435 and Claybrook Drive. A stream crosses the southern area of the plot (north/southerly direction). This area is indicated on the Environment Agency Floodplain Maps as a potential balancing area, so risk of flooding increases in this area.


Winyates Green
Winyates
Mappleborough Green
Matchborough
Mapoleborough Green
STUDLEY CP
Washford
1
2
3
4

## Planning Policy History

***Borough of Redditch Local Plan No 2. (Adopted 5th February 1996)***

The A435 Area of Development Restraint was first designated as such along with two other ADRs in the Borough of Redditch Local Plan No.2. The Local Plan No.2 Inspector's report recommended that certain lands on the edge of Redditch be included in the plan as 'Areas of Restraint' for use after the end of the Plan Period. The Inspector considered that if the Green Belt was drawn too tightly around the existing built-up area, it may not be possible to maintain an appropriate degree of permanence in its protection.

The A435 ADR was originally designated to provide land for the Studley bypass, but this road scheme was abandoned in the latter stages of the Local Plan No.3 Inquiry. The Inspector who considered objections to Local Plan No.2 concluded that there was some scope for limited development in addition to the bypass.

***Borough of Redditch Local Plan No. 3 (Adopted 31st May 2006)***

The ADR designations were carried forward to Local Plan No.3. Although the Inspector stated that no ADR land would be needed during the plan period, he recommended it should remain designated as such should it be needed for allocation after the expiry of this Plan's time span. The resultant policy within Local Plan No.3, B(RA).3 'Areas of Development Restraint' states that "ADR will be safeguarded to meet possible long term development requirements beyond the year 2011". Policy CS.7 'The Sustainable Location of Development' states that the ADRs will be considered after sites within the urban area.

In relation to the A435 ADR in particular, the Inspector's Report on the Second Deposit Local Plan No.3 states that although the main purpose of the ADR had disappeared (i.e. the Studley Bypass), the exceptional circumstances needed to extend the Green Belt over this ADR did not exist. The Inspector stated that the development potential of this site was not fully investigated and a review should be undertaken, but that such a review would not be possible until the needs stemming from changes to national and regional policy were clear.

***Core Strategy Issues and Options Document***

It was assumed at the Core Strategy Issues and Options stage that the A435 ADR would be included as a strategic site, required to meet the housing and employment figures prescribed in the RSS Phase 2 Revision.

In terms of the Sustainability Appraisal accompanying the Issues and Options document, it reports that use of the ADRs would assist in meeting the DPD objectives to have sufficient homes and to have a strong, attractive and diverse economic base. However, as the ADRs are located on the edges of the urban area and away from the train station and other transport nodes, the SA objective "to reduce the need to travel and move towards more sustainable travel patterns" may be compromised.

***Preferred Draft Core Strategy***

The A435 ADR was not included as a strategic site nor presumed to contribute towards meeting Redditch's housing and employment targets, primarily based upon evidence contained in the second stage report by White Young Green (more details below).

**Core Strategy Evidence Base documents**

***Strategic Housing Land Availability Assessment (SHLAA, March 2009)***
None of the three ADRs have been assessed by Redditch Borough Council in the SHLAA as they form part of a wider area of scope that was assessed by White Young Green (Studies published in October 2008 and January 2009); this is detailed in Appendix 8 of the SHLAA. It was preferable for the ADRs to be assessed in the same manner as the large areas beyond Redditch's boundary for consistency with respect to suitability, availability and achievability. However, the SHLAA will be updated in April 2010 and the ADRs will be assessed as part of this update.

***Employment Land Review (ELR, March 2009)***
The A435 ADR as a whole was not assessed in the Employment Land Review. One submission was made for a site within the ADR at Broadacres Farm (site ref ELR01). This submission was not taken forward based on the evidence in the WYG Stage 2 report (further details below) which suggested that the ADR should not be used for development but should be designated as Green Belt. A refresh of the ELR will be undertaken in 2010 which will reconsider the Broadacres Farm submission.

***Strategic Flood Risk Assessment Level 1 (SFRA, February 2009)***
The SFRA identifies an unnamed ordinary watercourse that runs adjacent to the A435 ADR. This watercourse has not yet been modelled meaning the site is currently within an area with no flood zone definition (main report table 8a). As such, the study recommends that the existing Flood Zone 2 be used to represent Flood Zone 3 with climate change until the watercourse has been assessed in greater detail (table 10a). The site is not currently covered by Flood Defence or Flood Warning, but is partially covered by Flood Watch (table 13a).

The SFRA also identifies this site as being potentially problematic in terms of increased runoff downstream due to its extent and positioning on sloping land which is underlain by impermeable soils. Therefore, development in this area will have to accommodate, and dispose of, all surface runoff using SUDS. It is anticipated that a Level 2 SFRA will be carried out in 2010 which will provide more information on this site and any adjacent watercourses.

***Water Cycle Strategy (WCS, February 2009)***
Table 11a identifies the A435 ADR as being at direct risk of flooding from the River Arrow and potentially from ordinary watercourses. Table 13a shows that development on this site will cause additional runoff which will pose an issue to existing development requiring a major upgrade of the drainage system. Based on an analysis of the direct flood risk and additional flood risk on this site, the overall flood risk is considered to be significant. In terms of the effect that development on the A435 ADR would have on the capacity of water supply infrastructure, the WCS suggests that only a minor infrastructure upgrade would be required as the site is located in proximity to a major supply main and can be accommodated within the existing system. Similarly, a minor infrastructure upgrade would be required to deal with wastewater on the site (table 26a).

***Joint Study into the Future Growth Implications of Redditch Town to 2026 (WYG1, December 2007)***
The A435 ADR is identified as part of site 18 in this study, which covers land beyond the ADR up to the A435 road to the east and the Winyates Green Triangle to the north. The SWOT analysis for the whole of this site is reproduced below. The study notes that part of the site is potentially affected by flooding, but it is free from the range of strategic constraints that is identified in other areas. Also highlighted is the potential issue relating to the coalescence between Redditch and Mappleborough Green, without suitable undeveloped 'buffers' being in place.

| | |
|---|---|
| STRENGTHS<br>1 Close to Redditch<br>2 Potential for access to A435 or Far Moor Lane/Claybrook Drive<br>3 Not in Green Belt<br>4 Parts of site overgrown/unused former farmland<br>5 Close to existing employment at Washford and Moon's Moat (Ravensbank)<br>6 Designated 'Area of Development Restraint' in Redditch Local Plan | WEAKNESSES<br>1 Narrow, mostly man-made hill dividing two busy roads – physically difficult to develop<br>2 Potential coalescence with Mappleborough Green<br>3 Contains allotments – need to accommodate/replace<br>4 Distant from Redditch town centre<br>5 Narrow strip of land between two busy roads makes access difficult/inefficient – many access points needed for relatively small number of houses<br>6 Contains established woodland some of it protected by TPO |
| OPPORTUNITIES<br>1 To connect to Redditch<br>2 To exploit woodland as part of site's character<br>3 To use existing high capacity roads for access<br>4 To link to sites 15, 17 and 19 | THREATS<br>1 Traffic noise from fast/busy roads/slip roads – A435 and A4023<br>2 Capacity of local road network to accommodate large scale development requires further investigation |

In reference to all three of the ADRs, the study states that they could be regarded as being preferable locations for development in comparison to other areas of open countryside that have been considered.

***Study into the future growth implications of Redditch – Second Stage Report (WYG 2, January 2009)***

This study reviewed both land within Redditch Borough boundaries and land adjacent to Redditch within Bromsgrove and Stratford-on-Avon Districts in order to identify a preferred location for cross-boundary development to meet the development targets set for Redditch. The study concluded that the three ADRs within Redditch were less preferable for development than some Green Belt land adjacent to Redditch but located in Bromsgrove district. These findings therefore identified more of Redditch's development to be accommodated in Bromsgrove District than prescribed in the WMRSS Phase Two review. However, as detailed in the introduction to this document, this argument was not accepted by the RSS Inspectors; in order to meet the development targets prescribed in the Panel Report, it is necessary to utilise the three ADRs in Redditch Borough.

***A study of Green Belt Land & Areas of Development Restraint within Redditch Borough (October 2008)***

The main conclusions that this study made regarding the A435 ADR are as follows:

- In the main, there would be no resultant loss of attractive countryside.
- No mineral reserves of sand and gravel deposits were identified within the ADR.
- Housing development here would not affect any significant ridge lines or prominent slopes.
- Development here would not appear to affect any ecological sites.
- The ADR is not considered to be of high landscape value.
- Development here would not be perceived as sprawling into open countryside and would be well contained.
- The site would not be poorly integrated with adjacent residential areas.

- There would be no major impact on the existing narrow lane network in this general area.
- Good footpath links.
- There is no technical evidence that educational, health or other social facilities in this area would be overloaded.
- The ADR is close to employment development/uses.
- The adopted Green Belt boundary would stop unrestricted sprawl of a large built-up area and would assist in safeguarding the countryside from encroachment.
- In relation to utility infrastructure capacity and constraints, there would be no significant constraints to development in the A435 ADR.

The study concludes that for the reasons outlined above, the proposals for the A435 ADR are acceptable in planning terms. The study suggests that the area is preferable to other Green Belt areas south-west of Redditch and west of Astwood Bank.

***Worcestershire Landscape Character Assessment (Worcestershire County Council, 2004*** http://worcestershire.whub.org.uk/cms/environment-and-planning/landscape-character-assessment.aspx***)***
Landscape Character is defined as a distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape differ from another. The A435 ADR is classified in the Landscape Character Assessment (LCA) as Principal Timbered Farmlands. It is stated in the Assessment that the overall strategy for the Principal Timbered Farmlands should be one of both conservation and restoration: conserving the existing tree cover and hedgerow pattern together with the network of hedgerows and aiming to conserve and restore the historic, well-wooded character of the landscape.

The Landscape Character Assessment Sensitivity Map (which is part of the evidence base forming the LCA) classifies the northern section of the A435 (i.e. the area located to the north of the A4189) and the very southern section (the isolated triangle between Claybrook Drive, Icknield Street Drive and the A435) as having a medium sensitivity to development.
The section of the A435 ADR located south of the A4189, and to where the southern section of the ADR meets the A435, is designated as highly sensitive. These designations should be taken into account when considering the design of new development.

**Development Options Sustainability Appraisal (February 2010)**
A Sustainability Appraisal has been undertaken at every stage of Core Strategy production so far, in order for the Council and interested parties to understand the significant effects associated with choosing different options for the strategy.

With specific reference to the A435 ADR, the site as defined in WYG First Stage Report as Area 18 (inclusive of wider land in Stratford on Avon District) was assessed in the March 2009 refresh to the SA. Overall, it was predicted that there would be slight negative sustainability effects should this land be developed. The ADR was included as part of the SA of WYG Second Stage Report Options (3, 4 and 5) which predicted that there would be negative sustainability effects.

Appendix E of the Core Strategy Development Plan Document - Sustainability Appraisal Refresh (February 2010) includes a recent appraisal of the Joint Consultation Development Options, and includes a specific SA of the A435 ADR. When assessed the A435 performs positively, however, not as positively as other ADR in the Borough. For details on mitigation measures and other SA effects

predicted, please see the Core Strategy Development Plan Document - Sustainability Appraisal Refresh (February 2010).

**Site Potential**

As stated above, the A435 ADR is most easily described as four separate plots. Having regard for the existing adjacent uses to these four plots, it is considered that residential development would be most appropriate for plots 1 and 2. The combined area of these plots is 19ha and, based on the approach taken in the SHLAA of a 65% developable area at a density of 30 dwellings per hectare, these plots could accommodate around 360 dwellings. However, the potential capacity of plot 2 will need careful consideration in relation to the allotments that currently exist on the site.

Plots 3 and 4 are located adjacent to existing employment uses and so, at this stage, employment development is considered most appropriate for these plots. Taking account of the area at risk of flooding in plot 4 and the existing features of plot 3, there is potentially up to 4ha that could be utilised for employment development.

**Main Pros and Cons of Development**

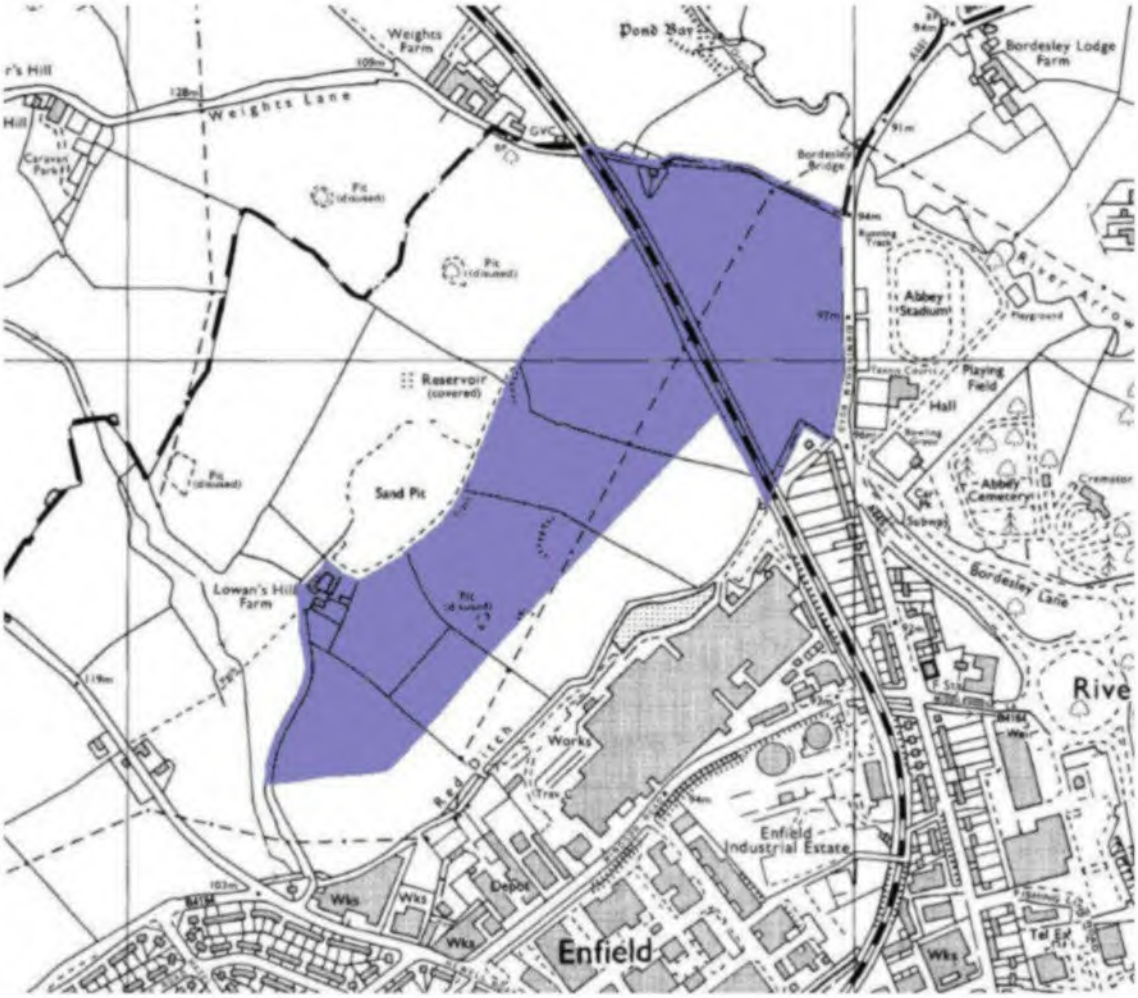
The main positive and negative aspects of potential development at the A435 ADR are summarised below. It should be noted that negative aspects can be overcome through the use of appropriate mitigation measures.

| Positive aspects of potential development | Negative aspects of potential development |
|---|---|
| • Designated ADR<br>• Suitable for residential and employment development which would relate well to existing adjoining uses<br>• Existing road infrastructure can be utilised for access<br>• Site is relatively flat and well contained<br>• Utility infrastructure poses no significant constraints to development | • Part of the site is at risk of flooding<br>• Potential negative impact on Mappleborough Green<br>• Site contains established woodland, protected by area TPOs<br>• Potential negative impact on wildlife and habitats<br>• Performs less positively than other ADRs in SA |

## 3b. Brockhill ADR

### Site location and description

Brockhill ADR is located to the northwest of the Windsor Road employment developments. It is bounded by the Red Ditch to the south, the railway line in the east and Lowans Hill farm track in the west. The northern boundary follows field boundaries from Lowans Hill Farm across to the railway line. It covers an area of 16.4Ha.




### Planning Policy History

***Borough of Redditch Local Plan No 2. (Adopted 5th February 1996)***

The Brockhill Area of Development Restraint was first designated in the Borough of Redditch Local Plan No.2 for the purposes of accommodating the long term growth needs of the Borough. The Local Plan No.2 Inspector's report recommended that certain lands on the edge of Redditch be included in the plan as 'Areas of Restraint' for use after the end of the Plan Period. The Inspector considered that if the Green Belt was drawn too tightly around the existing built-up area, it may not be possible to maintain an appropriate degree of permanence in its protection.

***Borough of Redditch Local Plan No. 3 (Adopted 31st May 2006)***

The ADR designations were carried forward to Local Plan No.3. Although the Inspector stated that no ADR land would be needed during the plan period, it should remain designated as such should it be needed for allocation after the expiry of this Plan's time span. The resultant policy within Local Plan no.3, B(RA).3 'Areas of

Development Restraint' states that "ADR will be safeguarded to meet possible long term development requirements beyond the year 2011". Policy CS.7 'The Sustainable Location of Development' states that the ADRs will be considered after sites within the urban area.

***Core Strategy Issues and Options***
The Brockhill ADR was included in the Issues and Options Consultation Document as a strategic site, required to meet the housing and employment figures prescribed in the RSS Phase 2 Revision.

In terms of the Sustainability Appraisal accompanying the Issues and Options document, it reports that use of the ADRs will assist in meeting the DPD objectives to have sufficient homes and to have a strong, attractive and diverse economic base. However, as the ADR are located on the edges of the urban area and away from the train station and other transport nodes, the SA objective "to reduce the need to travel and move towards more sustainable travel patterns" may be compromised.

Responses to the Issues and Options Consultation were in support of Brockhill ADR being a strategic site.

***Preferred Draft Core Strategy***
The Preferred Draft Core Strategy was prepared based on the evidence provided in the second stage report by White Young Green (more details below) and therefore did not include the Brockhill ADR as a potential development site.

**Core Strategy Evidence Base documents**

***Strategic Housing Land Availability Assessment (SHLAA, March 2009)***
None of the 3 ADRs have been assessed by Redditch Borough Council in the SHLAA as they form part of a wider area of scope that was assessed by White Young Green (Studies published in October 2008 and January 2009); this is detailed in Appendix 8 of the SHLAA. It was preferable for the ADRs to be assessed in the same manner as the large areas beyond Redditch's boundary for consistency with respect to suitability, availability and achievability. However, the SHLAA will be updated in April 2010 and the ADRs will be assessed as part of this update.

***Strategic Flood Risk Assessment Level 1 (SFRA, February 2009)***
There is currently no flood zone definition covering the Bordesley Brook which could potentially affect the Brockhill ADR, the SFRA recommends that a site specific FRA is carried out, or that the Brook is modelled to ascertain its flood zones The site is not currently covered by Flood Defence, Flood Warning or Flood Watch. It is anticipated that a Level 2 SFRA will be undertaken in 2010, which will examine this site in more detail.

***Water Cycle Strategy (WCS, February 2009)***
Brockhill ADR is potentially at risk of flooding from the Bordesley Brook, but, as stated above, the flood zone definitions are not currently known. As with both of the other ADRs, development at Brockhill would require a major upgrade to the drainage system (table 13a). The overall flood risk to this site is considered significant based on an analysis of direct and additional flood risk. A minor infrastructure upgrade would be required for both water supply and to deal with wastewater on the site (table 26a).

As there is no capacity within the sewage system of Redditch Borough (both combined and separate) for any surface water flow, it is important for any

development to incorporate suitable SUDS systems to attenuate and balance any surface water runoff. However, infiltration systems are likely to be ineffective over much of the Borough due to the predominantly heavy, impervious underlying sub-soils (marl). Open storage, where practicable, is therefore preferred, although at certain sites, such as Brockhill ADR, this would be problematic due to topography and current land drainage issues.

***Joint Study into the Future Growth Implications of Redditch Town to 2026 (WYG1, December 2007)***

This study concludes that development to the north of Redditch, including at the Brockhill ADR, is generally less constrained by highway and drainage infrastructure than sites to the south and west. Brockhill ADR is referred to as part of site 6 in this study. The following SWOT analysis is given for the site:

| | |
|---|---|
| STRENGTHS<br>1 Good links to Redditch town centre, including railway station, existing community facilities and also local employment areas<br>2 Substantial part of site already designated as ADR- therefore principle of development accepted<br>3 Links to existing residential areas<br>4 No environmental designation<br>5 Relatively low impact on Redditch highways<br>6 Provide relatively modest priced utility connections | WEAKNESSES<br>1 Partially Green Belt<br>2 Abuts SWS to north and west<br>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)<br>4 Traffic generated would pass through Windsor Road, which has limited capacity in peak hours – might be partly mitigated by signalised junction<br>5 Would load traffic onto A441, adversely affecting Bordesley<br>6 Would affect B4101<br>7 Steep topography<br>8 Upstream of very stressed sewerage network therefore foul drainage would naturally drain into town centre network with flooding history<br>9 Lack of capacity in local first schools |
| OPPORTUNITIES<br>1 Sustainable urban expansion, close to existing facilities.<br>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<br>3 Potential to contribute to implementation of Bordesley By-pass | THREATS<br>1 Transport interchange and alterations to railway line relies on cooperation of Network Rail<br>2 Potential objections from Highways Agency re loading additional traffic onto J2 of M42<br>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. |

In reference to all three of the ADRs, the study states that they could be regarded as being preferable locations for development in comparison to other areas of open countryside that have been considered.

***Study into the future growth implications of Redditch – Second Stage Report (WYG 2, January 2009)***

This study reviewed both land within Redditch Borough boundaries and land adjacent to Redditch within Bromsgrove and Stratford-on-Avon Districts in order to

identify a preferred location for cross-boundary development to meet the development targets set for Redditch. The study concluded that the three ADRs within Redditch were less preferable for development than some Green Belt land adjacent to Redditch but located in Bromsgrove district. These findings therefore identified more of Redditch's development to be accommodated in Bromsgrove District than prescribed in the WMRSS Phase Two review. However, as detailed in the introduction to this document, this argument was not accepted by the RSS Inspectors; in order to meet the development targets prescribed in the Panel Report, it is necessary to utilise the three ADRs in Redditch Borough.

***A study of Green Belt Land & Areas of Development Restraint within Redditch Borough (October 2008)***

This study makes the following conclusions about the Brockhill ADR:

- Development here would not cause the coalescence of any settlements.
- In the main, there would be no resultant loss of attractive countryside.
- Risks of watercourse pollution would not be significant.
- No mineral reserves of sand and gravel deposits were identified within the ADR.
- Housing development here would not affect any significant ridge lines or prominent slopes.
- Development here would not appear to affect any ecological sites.
- The ADR is not considered to be of high landscape value.
- Development here would not be perceived as sprawling into open countryside and would be well contained.
- The area would not be poorly integrated with adjacent residential areas.
- Given some minor improvements to the existing highway network, no major new expensive or problematic highway infrastructure would be required to serve this level of development.
- There would be no major impact on the existing narrow lane network in this general area.
- Footpath links.
- The area is located close to Town Centre, railway station, etc.
- There is no technical evidence that educational, health or other social facilities in this area would be overloaded.
- Part of the ADR is suitable for employment development/uses.
- The adopted Green Belt boundary would stop unrestricted sprawl of a large built-up area and would assist in safeguarding the countryside from encroachment.

For all of the reasons outlined above, this study concludes that the proposals for the Brockhill ADR are acceptable in planning terms, and that the area is preferable to other Green Belt areas southwest of Redditch and west of Astwood Bank.

***Worcestershire Landscape Character Assessment (Worcestershire County Council, 2004*** http://worcestershire.whub.org.uk/cms/environment-and-planning/landscape-character-assessment.aspx***)***

Both the Brockhill ADR and the Brockhill Green Belt are designated by the Landscape Character Assessment as Wooded Estatelands. The overall management strategy for Wooded Estatelands is one of conservation with elements of enhancement and restoration. The aim is to conserve the large scale structure and wooded character of the landscape, whilst seeking to restore parkland areas and enhance the overall landscape by encouraging an increase in woodland cover.

This parcel of land is also considered by the Landscape Character Assessment Sensitivity Map as highly sensitive. This designation should be taken into account when considering the design of new development.

**Development Options Sustainability Appraisal**
A Sustainability Appraisal has been undertaken at every stage of Core Strategy production so far, in order for the Council and interested parties to understand the significant effects associated with choosing different options for the strategy.

With specific reference to the Brockhill ADR, the site as defined in WYG First Stage Report as Area 6 (inclusive of surrounding land and Green Belt land north of the ADR) was assessed in the March 2009 refresh to the SA. Overall, it was predicted that there would be no significant positive or negative effects should this land be developed. The ADR was included as part of the SA of WYG Second Stage Report Options (3 and 5) which predicted that there would be negative sustainability effects.

Appendix E of the Core Strategy Development Plan Document - Sustainability Appraisal Refresh (February 2010) includes a recent appraisal of the Joint Consultation Development Options, and includes a specific SA of the Brockhill ADR. When assessed, the Brockhill ADR scored positively and had a more positive assessment than other ADRs in the Borough.

**Site Potential**
With respect to the determination of broad site capacity at this stage, net developable areas identified on draft master plan maps supplied by developers were used as a basis, along with officer consideration. As the master plan scheme also identifies areas of open space and land for other community facilities, only the areas identified for net residential development were used to determine capacity, with an allowance of 10% set aside to accommodate road infrastructure. Following this method, the potential residential development determined for Brockhill ADR is calculated below.

16.4 ha x 30 dph = 492 dwgs
**16.4 ha x 90% (to allow for roads) x 30 dph = 14.76 ha x 30 = 448 dwellings**
Estimated capacity = 450 dwgs (rounded)

There is also a potential 3ha to the east of the railway line that could be suitable for employment related development.

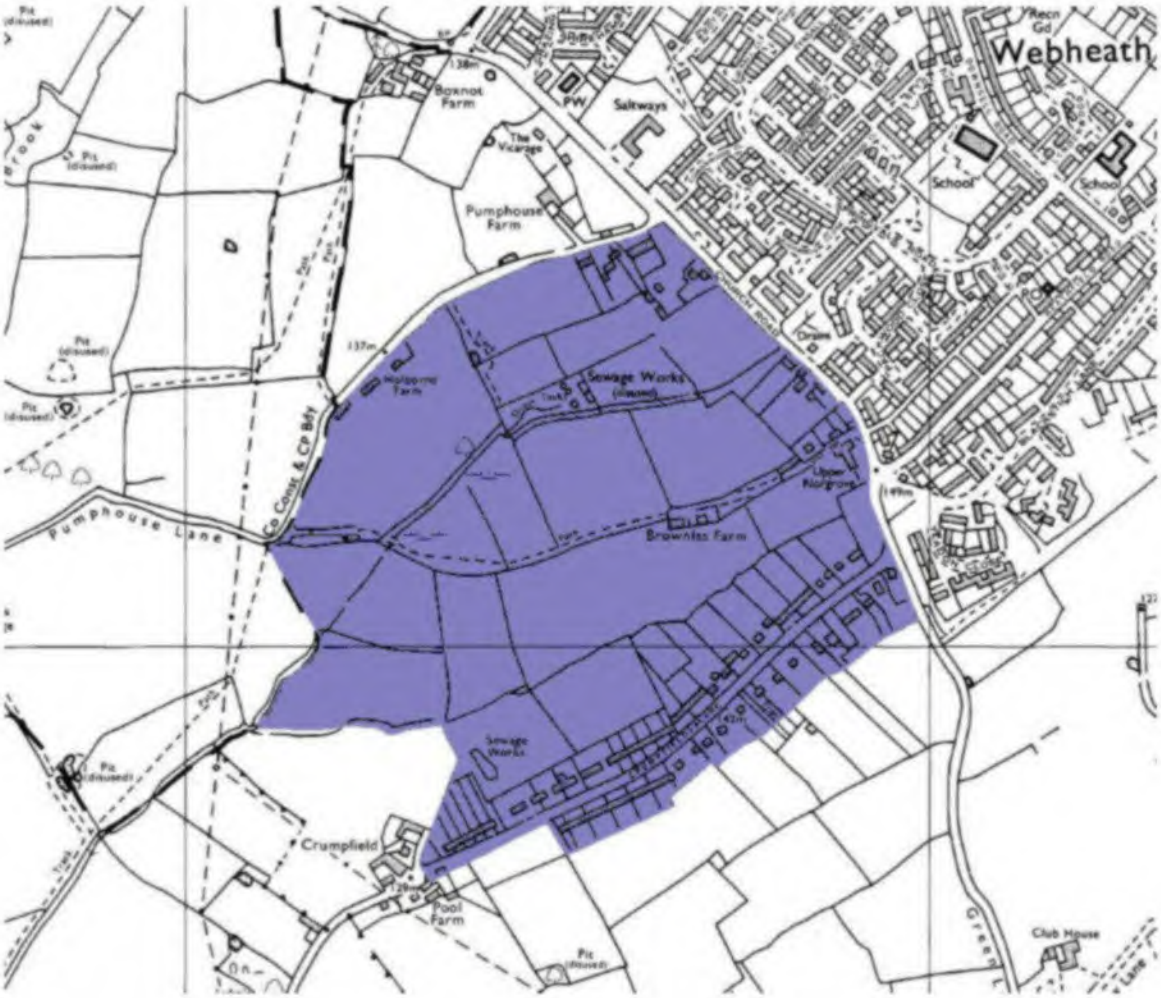
**Main Pros and Cons of Development**
The main positive and negative aspects of potential development at the Brockhill ADR are summarised below. It should be noted that negative aspects can be overcome through the use of appropriate mitigation measures.

| Positive aspects of potential development | Negative aspects of potential development |
|---|---|
| • Key infrastructure partially in place due to proximity of existing Brockhill development<br>• Well located to existing highway infrastructure and public transport facilities<br>• Close proximity to town centre facilities K | • Possible traffic congestion along Windsor Road and A441<br>• Some foul drainage flooding history related to existing Brockhill development<br>• Required SUDS may be difficult to implement<br>• Undulating topography |

## 3c. Webheath ADR

### Site location and description

Webheath ADR is located on the western edge of Redditch and extends from Church Road to the east, to the administrative boundary of Bromsgrove District to the west. To the north, the site is bounded by Pumphouse lane. The southern boundary of the site adjoins the rear of residential properties which front onto Crumpfields lane. The site is 28 Hectares in size and is covered by an Area Tree Preservation Order.




### Planning Policy History

***Borough of Redditch Local Plan No 2. (Adopted 5th February 1996)***

The Webheath Area of Development Restraint was first designated in the Borough of Redditch Local Plan No.2 for the purposes of accommodating the long term growth needs of the Borough. The Local Plan No.2 Inspector's report recommended that certain lands on the edge of Redditch be included in the plan as 'Areas of Restraint' for use after the end of the Plan Period. The Inspector considered that if the Green Belt was drawn too tightly around the existing built-up area, it may not be possible to maintain an appropriate degree of permanence in its protection.

***Borough of Redditch Local Plan No. 3 (Adopted 31st May 2006)***

The ADR designations were carried forward to Local Plan No.3. Although the Inspector stated that no ADR land would be needed during the plan period, it should remain designated as such should it be needed for allocation after the expiry of this

Plan's time span. The resultant policy within Local Plan no.3, B(RA).3 'Areas of Development Restraint' states that "ADR will be safeguarded to meet possible long term development requirements beyond the year 2011". Policy CS.7 'The Sustainable Location of Development' states that the ADRs will be considered after sites within the urban area.

***Core Strategy Issues and Options Document, Consultation Responses and SA***
The Webheath ADR was included in the Issues and Options Consultation Document as a strategic site, required to meet the housing and employment figures prescribed in the RSS Phase 2 Revision.

In terms of the Sustainability Appraisal accompanying the Issues and Options document, it reports that use of the ADRs will assist in meeting the DPD objectives to have sufficient homes and to have a strong, attractive and diverse economic base. However, as the ADRs are located on the edges of the urban area and away from the train station and other transport nodes, the SA objective "to reduce the need to travel and move towards more sustainable travel patterns" may be compromised.

One of the issues raised by consultees regarding the Webheath ADR was the need for improvements to public transport provision. Many respondents considered Webheath suitable for development, suggesting that it provides an opportunity to create a sustainable urban extension in a suitable location, which avoids the need to develop on Green Belt land, and which can contribute to the strategic allocation for housing provision. Respondents also recommended that the Webheath ADR would only be suitable for residential development.

With regard to delivery, respondents thought that if the Webheath ADR is developed then foul drainage, highways and the need for a new first school should be addressed. However, other respondents considered Webheath ADR as unsuitable for development and believed that it should not be designated as a strategic site as it is unsustainable due to the very poor road infrastructure in the area. It is also suggested that the ADR is a vital area for protection and therefore it is unsustainable for both housing and employment use. Furthermore, it is argued that as the site is outside the urban area, it should be treated the same as Green Belt, afforded the same status and protection.

***Preferred Draft Core Strategy Document, Consultation responses and SA***
The Preferred Draft Core Strategy was prepared based on the evidence provided in the second stage report by White Young Green (more details below) and therefore did not include the Webheath ADR as a potential development site.

**Core Strategy Evidence Base documents**

***Strategic Housing Land Availability Assessment (SHLAA, March 2009)***
None of the three ADRs have been assessed by Redditch Borough Council in the SHLAA as they form part of a wider area of scope that was assessed by White Young Green (Studies published in October 2008 and January 2009); this is detailed in Appendix 8 of the SHLAA. It was preferable for the ADRs to be assessed in the same manner as the large areas beyond Redditch's boundary for consistency with respect to suitability, availability and achievability. However, the SHLAA will be updated in April 2010 and the ADRs will be assessed as part of this.

***Employment Land Review (ELR, March 2009)***
Webheath ADR is not considered suitable for employment related development and has not been assessed by the ELR.

***Strategic Flood Risk Assessment (SFRA, February 2009) and Water Cycle Strategy (WCS, February 2009)***

The water cycle strategy points out that the overall flood risks to the Webheath ADR are significant. The cause of these potential flood risks is from surface flooding and from the watercourse that drains to Swans Brook (main report page 34 and 45). The study states that additional runoff would pose an issue to existing development and therefore a major upgrade to the existing drainage system would be required.

With regard to the required infrastructure, the study considers that minor infrastructure is needed to ensure a water supply and major infrastructure upgrades are necessary to ensure there is enough capacity for the waste water needs.

The most significant risks to Webheath ADR come from flooding and dealing with waste water, and, to a lesser extent, the provision of a water supply.

The Strategic Flood Risk Assessment identifies that the adjacent watercourse has no flood zone definition. The assessment recommends that a site-specific FRA is carried out, or that a new model is constructed to assess the flood risk of the site, including the effects of climate change.

It is anticipated that a Level 2 SFRA will be carried out in 2010 which will provide more detailed information on this site.

***Joint Study into the Future Growth Implications of Redditch Town to 2026 (WYG1, December 2007),***

Webheath ADR forms part of site 3 in this study, for which the SWOT analysis is reproduced overleaf. It should be noted that site 3 covers a wider area than the ADR and a large part of this additional land is land designated as Green Belt to the south west of Redditch. This area of Green Belt has been discounted as a potential location for development on sustainability grounds; however, the ADR remains a viable location.

| STRENGTHS | WEAKNESSES |
|---|---|
| 1 Northern part includes Webheath Area of Development Restraint (principle of future development accepted)<br>2 Provide logical infilling between Webheath and Elcock's Brook/Callow Hill | 1 Current access only possible through existing residential roads-insufficient capacity to develop all of land parcel<br>2 Therefore, would require major new access from/to A448. However, no suitable<br>linkage point back to main road network<br>3 Northern route out of Redditch creating bottle-neck<br>4 Small part of site with SWS designation<br>5 Not well related to existing town centre<br>6 Topography and landscape value<br>7 Part within Flood Zone 3<br>8 Green Belt<br>9 Naturally drains to sewage treatment works with limited discharge capacity therefore need to pump over ridge into east Redditch where it may hit stressed network in town centre<br>10 Options 2 and 3 would require works at Redditch South Primary substation circa £1.2m + new network<br>11 Grade II listed building within this site<br>12 Lack of capacity at local first, middle and high school |
| OPPORTUNITIES<br>1 Could combine with site 3A (Redditch Golf Club and Morton Stanley Park) (though site 3A is unlikely)<br><br>2 Could deliver major infrastructure on back of the development (although without linkage to Site 4 (Land West of A448) no opportunity to provide direct link to A448)<br><br>3 Potential to achieve development at the Webheath ADR site relatively quickly as a discrete parcel, with yield being determined by capacity of local road network | THREATS<br>1 Access and infrastructure costs and restricted opportunities to achieve satisfactory highway solution (connection to Primary Distributor network),<br>severely limit development potential<br><br>2 Potential objection by Environment Agency on grounds of flood risk |

In reference to all three of the ADRs, the study states that they could be regarded as being preferable locations for development in comparison to other areas of open countryside that have been considered.

***Study into the future growth implications of Redditch – Second Stage Report (WYG 2, January 2009)***

This study reviewed both land within Redditch Borough boundaries and land adjacent to Redditch within Bromsgrove and Stratford-on-Avon districts in order to identify a preferred location for cross-boundary development to meet the development targets set for Redditch.

The study concluded that the three ADRs within Redditch were less preferable for development than some Green Belt land adjacent to Redditch but located in Bromsgrove district. These findings therefore identified more of Redditch's development to be accommodated in Bromsgrove District than prescribed in the WMRSS Phase Two review. However, as detailed in the introduction to this document, this argument was not accepted by the RSS Inspectors; in order to meet the development targets prescribed in the Panel Report, it is necessary to utilise the three ADRs in Redditch Borough.

***A study of Green Belt Land & Areas of Development Restraint within Redditch Borough (October 2008)***

This study pulls together all of the historical information relating to the potential for Webheath ADR to support development. Looking at all of the evidence combined, the study supports the principle of development at Webheath.

The study concludes that the Webheath ADR would:

- Not cause the coalescence of any settlements contrary to the aims of PPG2.
- Not result in loss of attractive countryside in the main.
- Not impact on the setting of Norgrove Court - Grade I Listed Building.
- Not impact on the Alders Brook Valley.
- Not present any significant risks of watercourse pollution.

Furthermore, the following conclusions, with regard to the Webheath ADR are made:

- The area north of Crumpfields Lane is better contained.
- Housing development here would not affect any significant ridge lines or prominent slopes.
- Development here would not appear to affect any ecological sites.
- No mineral reserves of sand and gravel deposits were identified within the ADR.
- Alders Brook Valley offers a great asset to Redditch – development should be avoided here.
- Development here would not have a serious effect on the landscape.
- Development here would not be perceived as sprawling into open countryside and would be well-contained
- The area would not be poorly integrated with adjacent residential areas.
- Given some minor improvements to the existing highway network, no major new, expensive or problematic highway infrastructure would be required to serve this level of development.
- There would be no major impact on the existing narrow lane network in this general area.
- There are good footpath links.
- The area is relatively close to Town centre, railway station, etc.
- There is no technical evidence that educational, health or other social facilities in this area would be overloaded.
- The area is not particularly desirable or topographically suitable for employment development/uses.
- The adopted Green Belt boundary would stop unrestricted sprawl of a large built-up area and would assist in safeguarding the countryside from encroachment.

The study, overall, supports the principle of development at Webheath by stating, *"For all of the reasons outlined above, it is clear that the reduced proposals for the ADR at Webheath are entirely consistent with the advice in PPG2 and that the*

*development would be relatively harmonious with the existing development in the Webheath area of Redditch… Given the measures to deal with watercourse pollution, improvements to the local highway network, funding by developers of social and community facilities and so forth, such development of this ADR would be acceptable and would fully integrate with the local area. From the in-depth and independent examinations through the local plan process, it is also evident that the selection of this area of land as an ADR for future development is far more preferable than other land elsewhere in the designated Green Belt around Redditch."*

***Worcestershire Landscape Character Assessment (Worcestershire County Council, 2004*** http://worcestershire.whub.org.uk/cms/environment-and-planning/landscape-character-assessment.aspx***)***
The Webheath ADR is classified in the Landscape Character Assessment as having the landscape type of Principal Timbered Farmlands. This Landscape Character Assessment states that the overall strategy for the Principal Timbered Farmlands should, therefore, be one of both conservation and restoration: conserving the existing tree cover and hedgerow pattern together with the network of hedgerows and aiming to conserve and restore the historic, well-wooded character of the landscape.

The Landscape Character Assessment Sensitivity Map (which is part of the evidence base forming the LCA) classifies the Webheath ADR as highly sensitive. This designation should be taken into account when considering the design of new development.

**Development Options Sustainability Appraisal**
A Sustainability Appraisal has been undertaken at every stage of Core Strategy production so far, in order for the Council and interested parties to understand the significant effects associated with choosing different options for the strategy.

With specific reference to the Webheath ADR, the site as defined in WYG First Stage Report as Area 3 (inclusive of land to the south of the ADR designated as Green Belt) was assessed in the March 2009 refresh to the SA. Overall, it was predicted that there would be significantly negative sustainability effects should this land be developed. The ADR was included as part of the SA of WYG Second Stage Report Options (3 and 4) which predicted that there would be negative sustainability effects.

Appendix E of the Core Strategy Development Plan Document - Sustainability Appraisal Refresh (February 2010) includes a recent appraisal of the Joint Consultation Development Options, and includes a specific SA of the Webheath ADR. When assessed, the Webheath ADR scored positively, but when compared against the other ADR in the Borough, Webheath ADR was found to be a more positive option in some instances, and a more negative option in others.

**Site Capacity, Delivery and Infrastructure**
Based on evidence, the appropriate capacity for the Webheath ADR is considered to be approximately 600 dwellings, due to restrictions caused by topography and the local highway network. (Based on figures in WYG 1 (December 2007), WYG 2 (January 2009), 2004 Webheath proposal)

If Webheath ADR is developed, then foul drainage, highways and the need for a new first school should be major considerations.

**Main Pros and Cons of Development**

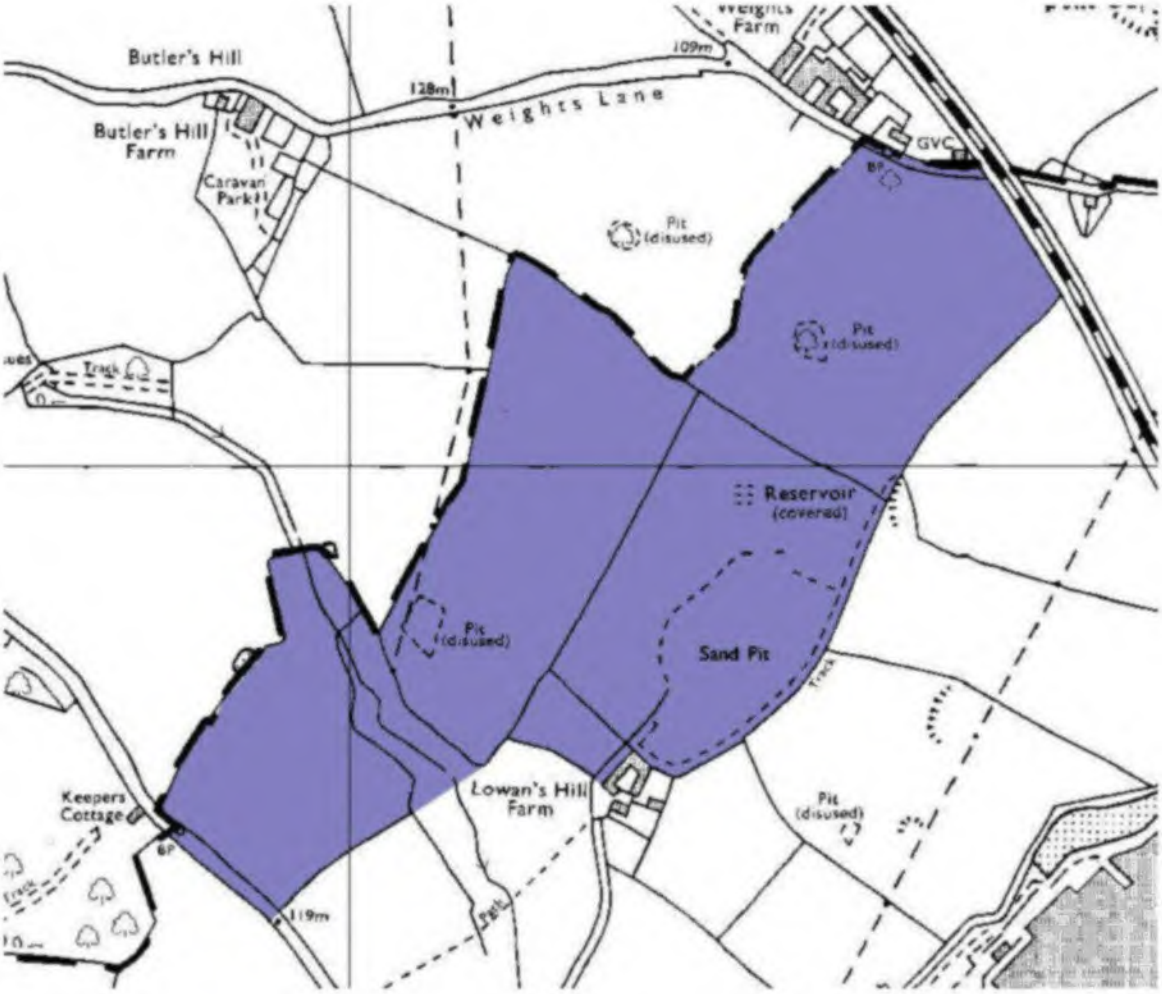
The main positive and negative aspects of potential development at Webheath ADR are summarised below. It should be noted that negative aspects can be overcome through the use of appropriate mitigation measures.

| Positive aspects of potential development | Negative aspects of potential development |
|---|---|
| • Good physical boundaries to limit development<br>• Might improve commercial viability of service provision<br>• ADR has capacity for 600 dwellings +<br>• Designated ADR | • Poor accessibility to community facilities<br>• Accessibility to public transport, the town centre and main employment sites is poor<br>• Maybe less preferable than other locations due to location in relation to services and Town Centre and impact on the relative environment surrounding the site. |

## 3d. Brockhill Green Belt

### Site location and description

The Green Belt in the vicinity of Brockhill lies to the northwest of the Brockhill ADR and continues northwest to the Borough Boundary. It extends to the railway line in the northeast and across to Brockhill Lane in the southwest. A gas pipeline runs underneath the site which will impact on the net developable area. The total site covers an area of 27.5 Ha.




### Planning Policy History

The Green Belt at Brockhill was designated during the preparation and adoption of Local Plan No. 2. Since then, this section of Green Belt has not been subject to any planning policy changes. This site has not been considered previously during Core Strategy preparation, including in the majority of the Evidence base documents. There are, however, some exceptions to this which are detailed below.

### Core Strategy Evidence Base Studies

***Joint Study into the Future Growth Implications of Redditch Town to 2026 (WYG1, December 2007)***

Brockhill Green Belt is considered as part of the same site as Brockhill ADR in this study. The SWOT analysis reproduced for the ADR also relates to this site.

***A study of Green Belt Land & Areas of Development Restraint within Redditch Borough (October 2008)***
This study draws together all of the relevant literature on Green Belt land and ADRs in the Borough. Of particular interest for the Brockhill Green Belt are:

1973 Joint Study of Feasibility
This study identified that landscape quality presented two kinds of restraint upon development in the Brockhill area, namely:

1. Extensive stands of trees
2. High landscape value

In terms of the constraint posed by the presence of trees, an extensive area of woodland was identified in the north-west of the area, and was particularly accentuated at Hewell Grange (in Bromsgrove District). This important woodland area immediately abuts the Brockhill area and therefore affects its feasibility for development. Similarly, the high landscape value of the area negates its development.

Redditch Joint Study 1988
This study states there was a presumption against development on the use of good quality land i.e. land falling within Grades 1, 2 and 3(a) of the Ministry of Agriculture, Fisheries and Food Classification. The viability of farms for development was also raised. The Report identified that the best areas of farmland were Grade 3(a) and pockets of Grade 2 land to be situated in and around the Brockhill area, therefore posing a problem for any future development of the area.

To be in accordance with Structure Plan policies, Paragraph 3.6 identified that development should not be permitted on ridgelines, as development in these areas would be seen for some distance from the surrounding countryside. Ridgelines were identified at Hewell Park and Butlers Hill to the northwest of Redditch and in the vicinity of the Brockhill area. Map 4 of the Report showed a ridgeline in the Foxlydiate area and extending into the Brockhill area. Therefore development would be ill-advised in these areas based on the visual impact they would have on the aesthetics and vista of the site, which would be visible from afar.

***Worcestershire Landscape Character Assessment (Worcestershire County Council, 2004*** http://worcestershire.whub.org.uk/cms/environment-and-planning/landscape-character-assessment.aspx***)***
Both the Brockhill ADR and the Brockhill Green Belt are designated by the Landscape Character Assessment as Wooded Estatelands. The overall management strategy for the Wooded Estatelands is one of conservation with elements of enhancement and restoration. The aim is to conserve the large-scale structure and wooded character of the landscape, whilst seeking to restore parkland areas and enhance the overall landscape by encouraging an increase in woodland cover.

This parcel of land is also considered by the Landscape Character Assessment Sensitivity Map as highly sensitive. This designation should be taken into account when considering the design of new development.

**Development Options Sustainability Appraisal**
A Sustainability Appraisal has been undertaken at every stage of Core Strategy production so far, in order for the Council and interested parties to understand the significant effects associated with choosing different options for the strategy.

With specific reference to the Brockhill Green Belt, the site as defined in WYG First Stage Report as Area 3 (inclusive of land designated as ADR) was assessed in the

March 2009 refresh to the SA. Overall, it was predicted that there would be no significant positive or negative effects should this land be developed. This Green Belt site was not assessed as part of the WYG Second Stage Report.

Appendix E of the Core Strategy Development Plan Document - Sustainability Appraisal Refresh (February 2010) includes a recent appraisal of the Joint Consultation Development Options, and includes a specific SA of the Brockhill Green Belt. When assessed against other Green Belt areas and ADR, the Brockhill Green Belt scores positively, however the ADRs score more positively than this site. The Brockhill Green Belt scores more positively than the Foxlydiate Green Belt.

**Site Potential**

Based on net developable areas, and specifically areas identified for net residential development, and taking into consideration the 10% allowance for road infrastructure and development exclusion zone for the gas pipeline, the site potential for the Brockhill Green Belt is outlined below.

**10.95 ha x 90% (roads) = 9.9 ha x 30 dph = 297 dwgs (net for gas pipeline)**
**Estimated capacity = 300 dwgs (rounded)**

**Main Pros and Cons of Development**

The main positive and negative aspects of potential development at Brockhill Green Belt are summarised below. It should be noted that negative aspects can be overcome through the use of appropriate mitigation measures.

| Positive aspects of potential development | Negative aspects of potential development |
|---|---|
| • Development would not significantly reduce the gap between Bromsgrove and Redditch<br>• Development would be a natural extension to development at Brockhill and Brockhill ADR<br>• Key infrastructure partially in place due to close proximity of existing Brockhill development<br>• Well located to existing highway infrastructure and public transport facilities<br>• Close proximity to town centre facilities | • Site is within Green Belt<br>• Site adjoins Bromsgrove District's Landscape Protection Area<br>• Undulating topography<br>• Site includes southern tip of visually prominent ridgeline extending to a height of 150m<br>• Possible traffic congestion along Windsor Road and A441<br>• Some foul drainage flooding history related to existing Brockhill development |

## 3e. Foxlydiate Green Belt

### Site location and description

The Foxlydiate Green Belt site is located in the western area of Redditch Borough. The site is bounded by the Redditch Borough administrative boundary to the north and the A448 to the south. Brockhill Drive runs through the middle of the site. The site is adjacent to the Foxlydiate & Pitcheroak Wood Special Wildlife Site and the Foxlydiate Local Nature Reserve. The site is marked by a highland ridge to the southwest of the site.

### Planning Policy History

The Green Belt at Foxlydiate was designated during Local Plan No. 2. Since then, this section of Green Belt has not been subject to any planning policy changes. The site has not been considered previously during Core Strategy preparation, including in the majority of the Evidence base documents. There are, however, some exceptions to this which are detailed below.

### Core Strategy Evidence Base documents

***Joint Study into the Future Growth Implications of Redditch Town to 2026 (WYG1, December 2007)***

The Foxlydiate portion of Green Belt land (referred to as part of the North West Quadrant in the study) was analysed as a potential location for development. It was considered that development in this area offers the following advantages:

- Sufficient land is available to accommodate growth, taking into account physical constraints and flood risk areas.
- The potential to link to the A448 and the A441 corridors.
- 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.
- Well located relative to Redditch town centre and existing and proposed employment areas.

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

- Development 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.
- Foul drainage requirements would be difficult and costly to meet.
- Would potentially bring development close to Bordesley affecting its character (although this is not designated as a settlement in the development plan).

The study also conducted a SWOT (Strengths, Weaknesses, Opportunities and Threats) of the development site.

| | |
|---|---|
| STRENGTHS<br>1 Relatively well connected to Redditch town centre and existing employment areas<br>2 Potential to link to A448 through upgrade of existing access<br>3 Logical extension to relatively new housing area (Brockhill)<br>4 Limited highway impact on town centre | WEAKNESSES<br>1 Green Belt<br>2 Steep topography running alongside A448<br>3 Southern part designated as SWS and LNR and northern part is SWS<br>4 Site traversed by land in Flood Zone 3<br>5 Upstream of very stressed sewerage network therefore foul drainage would naturally drain into town centre network with flooding history<br>6 Sand and gravel deposits identified on part of site<br>7 Lack of capacity in local first school |
| OPPORTUNITIES<br>1 Sustainable urban expansion, close to existing facilities<br>2 High quality public transport along A448<br>3 Could link to site 6 (Land north and south of Lowan's Hill Farm) to provide critical mass to deliver infrastructure | THREATS<br>1 Potential objection by Environment Agency on grounds of flood risk<br>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. |

***Study into the future growth implications of Redditch – Second Stage Report (WYG 2, January 2009)***

This study identifies the wider Foxlydiate area as a potential, future development site. The proposed site in this study includes the parcel of Green Belt within Redditch Borough and a wider area in Bromsgrove District, also designated Green Belt. Although the comments in this study are for a wider area, they are relevant to the Green Belt parcel within Redditch.

The study considers that although the site is designated as Green Belt, 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.

With regard to the infrastructure needed to develop the site, it is considered that the site could be accessed from an upgrading to the existing grade separated junction with the Bromsgrove Highway. However, in terms of sewage, this would need to be pumped to Spernall Sewage Treatment Works.

The study details that although the area is located in a peripheral location, Redditch town centre is only approximately two miles away and the site could be well served by public transport. There is also the potential to form an access to Church Road which could help to ease congestion in the Webheath area.

***A study of Green Belt Land & Areas of Development Restraint within Redditch Borough (October 2008)***

This study tells the 'story' of the identified Foxlydiate parcel of Green Belt land in Redditch. The study considers the historical documents relating to this parcel of land, each considering the suitability of the land for development. Of particular interest for this site are:

Redditch Joint Study 1988

The Report identified that the area around Foxlydiate is one of the best areas of farmland with Grade 3(a) land interspersed with pockets of Grade 2 land. Historically, there is a presumption against development on the use of this type of good quality farmland i.e. land falling within Grades 1, 2 and 3(a) of the Ministry of Agriculture, Fisheries and Food Classification. The Report also showed a ridgeline in the Foxlydiate area extending into the Brockhill area. It is considered that development should not be permitted on ridgelines, as development in these areas would be seen for some distance from the surrounding countryside.

The Foxlydiate area was identified as a locality which was considered to be unsuitable to accommodate large scale development for the following reasons:

(a) The majority of the farmland in the area was of good quality (Grade 2 and 3a) and should be protected from future development.
(b) There were ridges of high ground and development on these ridges would be prominent for some distance from the surrounding countryside.
(c) In the Foxlydiate area, there were sand and gravel deposits.
(d) Parts of the area around Hewell Park, Cladshill and Brockhill Wood were classified as being of high ecological value by the Worcestershire Nature Conservation Trust. The Trust's policy was that these zones should be exempt from development.
(e) There were two main woods in the area - Brockhill and Butlers Hill Wood – development should avoid these woodlands.

Inspector's Report on Deposit Borough of Redditch Local Plan No.2

The land to the north rises steeply to Brockhill Wood (Bromsgrove District) and, in the northwest, rises relatively steeply to Oxstalls Farm and Tack Farm in the vicinity of the Foxlydiate Junction of the B4184 with the A448 Bromsgrove Highway. The Report stated that the Council maintained that further development on this rising land to the northwest would be damaging to the local landscape.

Finally, in considering an objection to a small area of Green Belt at Foxlydiate bounded by Birchfield Road (adjacent to the Foxlydiate Hotel), the A448 and the Old Post Office, the Inspector concluded that this land contributed to the open character of the corridor between Redditch and Bromsgrove. He considered that this area of land had been properly included in the Green Belt.

County of Hereford and Worcester Minerals Local Plan April 1997

The Report outlined that there was an 'Identified Minerals Deposit' of sand and gravel at Foxlydiate, straddling the administrative boundary between Redditch and Bromsgrove, that may need consideration before any development in the locale can begin.

***Worcestershire Landscape Character Assessment (Worcestershire County Council, 2004*** http://worcestershire.whub.org.uk/cms/environment-and-planning/landscape-character-assessment.aspx***)***

The section of Green Belt located adjacent to Foxlydiate Wood, which is considered as being suitable for development, has been taken into account by the Landscape Character Assessment. Rather than the whole site, this Assessment looks at specific areas within the Foxlydiate Green Belt that are of particular value and therefore warrant classification and protection.

The parcel of land to the North of the B4184, which is considered suitable for development located, is designated in the Landscape Character Assessment as Wooded Estatelands. The overall management strategy for the *Wooded Estatelands* is one of conservation with elements of enhancement and restoration. The aim is to conserve the large scale structure and wooded character of the landscape, whilst seeking to restore parkland areas and enhance the overall landscape by encouraging an increase in woodland cover.

This parcel of land is also considered by the Landscape Character Assessment Sensitivity Map as highly sensitive. This designation should be taken into account when considering the design of new development.

The section of land to the south of the B4184 is designated by the Landscape Character Assessment as Principal Timbered Farmland. This landscape character type's management strategy should, therefore, be one of both conservation and restoration: conserving the existing tree cover and hedgerow pattern together with the network of hedgerows and aiming to conserve and restore the historic, well wooded character of the landscape.

This parcel of land is also considered by the Landscape Character Assessment Sensitivity Map as having medium sensitivity. This designation should be taken into account when considering the design of new development.

**Development Options Sustainability Appraisal**

A Sustainability Appraisal has been undertaken at every stage of Core Strategy production so far, in order for the Council and interested parties to understand the significant effects associated with choosing different options for the strategy.

With specific reference to the Foxlydiate Green Belt, the site as defined in WYG First Stage Report as Area 5 (inclusive of surrounding land designated as Green Belt) was assessed in the March 2009 refresh to the SA. Overall, it was predicted that there would be slight negative sustainability effects should this land be developed. The Foxlydiate Green Belt was included as part of the SA of WYG Second Stage Report Options (4 and 5) which predicted that there would be negative sustainability effects.

Appendix E of the Core Strategy Development Plan Document - Sustainability Appraisal Refresh (February 2010) includes a recent appraisal of the Joint Consultation Development Options, and includes a specific SA of the Foxlydiate Green Belt. When assessed against other Green Belt areas and ADR, the Foxlydiate Green Belt scores positively, however all other sites are predicted to perform more positively.

**Site Capacity, Delivery and Infrastructure**

The Foxlydiate area of Green Belt within the Redditch Borough boundary is considered to be capable of accommodating approximately 190 dwellings. This figure is based on the assumption that the Brockhill area, rather than the Foxlydiate site, will provide the retail facilities needed to support both itself and the Foxlydiate area. However, if Brockhill is not developed alongside the Foxlydiate Green Belt, then retail facilities would need to be accommodated within the area, subsequently reducing the amount of dwellings that could be provided on the site.

**Main Pros and Cons of Development**

The main positive and negative aspects of potential development at Foxlydiate Green Belt are summarised below. It should be noted that negative aspects can be overcome through the use of appropriate mitigation measures.

| Positive aspects of potential development | Negative aspects of potential development |
|---|---|
| • The site is well screened<br>• The area is well served by public transport<br>• Good access via the Bromsgrove Highway<br>• Development would not significantly reduce the gap between Bromsgrove and Redditch | • This area is highly sensitive wood estate lands and generally highly sensitive visually<br>• Drainage is difficult<br>• Site is in Green Belt<br>• Site is not close to employment areas within the Borough |

## 3f. Land to the rear of the Alexandra Hospital

### Site location and description

The site is located in the Greenlands ward of Redditch, and more specifically in the Woodrow area, which is predominately residential. The site is in close proximity to activity associated with the hospital and is west of the Kingsley College playing fields. Green Lane borders the southern edge of the site and also the Borough boundary. The cycle and walking path extending from Nine Days Lane is the western boundary. The site is 8.23 hectares in size.

In terms of topography, the site slopes from north to south. The western boundary is lined by a thick hedge, while the southern boundary is edged by a tree belt. The site is predominantly flat grassland. However, mature trees and a substantial hedgerow border the eastern boundary.

Worcestershire Wildlife Consultancy carried out an *'Extended Phase 1 Assessment'* of the land to the rear of the Alexandra hospital. This assessment found that the area is classified as lowland meadows. The report details that any removal of hedgerows requires permission from the Local Authority. It also recommends that surveys are undertaken to evaluate the importance of birds, badgers and reptiles with regard to the site.

### Planning Policy History

Land to the Rear of Alexandra Hospital has been subject to planning policy discussions and proposals in the past.

#### *Local Plan No.1*

At the time of preparing Local Plan No.1 the Hospital was being developed. The Local Plan No.1 proposals map allocates space for the development of the hospital, which incorporates some of the land now referred to as 'Land to the Rear of Alexandra Hospital'. Policy SC.2 of Local Plan No.1 was the overarching policy relating to the Hospital site (Appendix E).

#### *Local Plan No.2*

Local Plan No.2 allocated land south of the hospital for the purposes of health services or directly related services. However, reference is made in the policy to the potential use of the site for employment purposes if it becomes surplus to health related needs. Policy HE.1 is the overarching policy for the site area in Local Plan No.2.

***Local Plan No.3***

A component of the site was designated to meet employment land requirements as part of Local Plan No.3. This site amounted to two Hectares in size and is listed in the *'Schedule of employment land'* of Local Plan No.3 as Site IN 69 (B1 use only).

In addition to this, the Land to the Rear of Alexandra Hospital site was developed further as part of a SPD, which sought to guide the development of the employment site and wider site. The plan below depicts the SPD site boundary

***Core Strategy***

The Land to the Rear of Alexandra Hospital was allocated as a Strategic Site in the development of the Core Strategy. In addition, the Employment Land Review explored the whole of the Land to the Rear of Alexandra Hospital as a potential site to meet future employment requirements. The main conclusion arsing from the Employment Land Review was that employment use on the site was preferable to other potential uses. However, in order to be in conformity with emerging regional planning requirements, there is a need to further consider and explore the potential for a mix of uses to be developed on the site.

The Council received comments during consultation on the Issues and Options Document. Some respondents did not want to see a Greenfield site being developed, but some recognised the potential of the site to meet employment requirements.

Importantly, following consultation on the Preferred Draft Core Strategy, the NHS Trust emphasised the need for some of the land considered as part of the Employment Land Review to be maintained for health related purposes; this land is just south of the hospital boundary. Following discussions with the NHS Trust, it was agreed that this parcel of land would be maintained for health related purposes.

**Core Strategy Evidence Base documents**

***Strategic Housing Land Availability Assessment (SHLAA, March 2009)***

The Land to the Rear of the Alexandra Hospital was not assessed by the March 2009 edition of the SHLAA. It will be assessed in an update due to be published in April 2010.

***Employment Land Review (ELR, March 2009)***

As part of the Employment Land Review, several segments of the Land to the Rear of Alexandra Hospital were submitted for assessment. This was inclusive of sites submitted by the landowners, existing IN sites and former Urban Capacity sites. Each site was considered on its own merits, but following these site assessments, it was decided a more logical approach would be to combine all of the sites as a comprehensive site for development (although, it should be noted that the site area has since changed as part of the Development Options work). Overall, the Employment Land Review deemed that the Land to the Rear of Alexandra Hospital was suitable for employment purposes, specifically high class B1 offices. However, the Employment Land Review concluded that it was not feasible for the whole of the site to be developed for employment purposes in order to be in conformity with the

emerging RSS, which specifies that a maximum of 5000sq.m of offices can be developed on the site. Therefore it was proposed that the site be progressed as a mixed use development encompassing offices.

***Strategic Flood Risk Assessment (SFRA, February 2009) &Water Cycle Strategy (WCS, February 2009)***

In relation to the Strategic Flood Risk Assessment and Water Cycle Strategy, Land to the Rear of Alexandra Hospital (Local Plan No.3 boundary (IN 69)) was assessed as a Strategic Site. There were no major historical flood issues identified with the site. However, it is recommended that a site-specific Flood Risk Assessment is carried out on the Land to the Rear of Alexandra Hospital, or that a new model is constructed to assess the flood risk of the site, taking into account the effects of climate change. In addition, the Water Cycle Strategy states that the site has a medium flood risk, indicating that SUDS and upgrades to the existing drainage network may be required, as well as minor infrastructure upgrades. It is also understood that in 2007 there was some surface flooding on Green Lane, potentially from an ordinary watercourse. The additional runoff does pose a threat to development, hence the need for some upgrading to occur.

***Worcestershire Landscape Character Assessment***

With regard to landscape, the Land to the Rear of the Alexandra Hospital has not been considered by the Landscape Character Assessment as it is located within the urban area. An Urban Characterisation Assessment has not been completed yet. When the Urban Characterisation Assessment has been completed this will be a consideration for any future development on this site.

The site, however, borders land within Stratford-On-Avon District which has been assessed by the Landscape Character Assessment. This land is designated as Wooded Estate lands. It is considered that, given the close proximity of this land to the site, the key features of this landscape character type would continue into, and be relevant to, the landscape of the Land to the Rear of Alexandra Hospital. Any future development on the site should, therefore, take into account the key features of the Wooded Estateland Landscape Character Type and seek to maintain its principles.

The overall management strategy for the Wooded Estatelands is one of conservation with elements of enhancement and restoration: aiming to conserve the large scale structure and wooded character of the landscape, whilst seeking to restore parkland areas and enhance the overall landscape by encouraging an increase in woodland cover.

**Development Options Sustainability Appraisal**

A Sustainability Appraisal has been undertaken at every stage of Core Strategy production so far, in order for the Council and interested parties to understand the significant effects associated with choosing different options for development.

With specific reference to the Land to the Rear of the Alexandra Hospital, the site was not included in the WYG First Stage Report. The site was assessed as a strategic site in the SA accompanying the Preferred Draft Core Strategy, and was designated as employment use. Overall, it was predicted that there would be positive sustainability effects should this land be developed. The Land to the Rear of the Alexandra Hospital was not included as part of the SA of WYG Second Stage Report Options.

Appendix E of the Core Strategy Development Plan Document - Sustainability Appraisal Refresh (February 2010) includes a recent appraisal of the Joint Consultation Development Options, and includes a specific SA of the Land to the

Rear of the Alexandra Hospital. When assessed against other Green Belt areas and ADRs, the Land to the Rear of the Alexandra Hospital scores positively in comparison to all sites with the exception of Brockhill ADR.

**Site Potential**

Following the methodology set out in the Strategic Housing Land Availability Assessment, it is appropriate to suggest that 65% of the land could be used for housing/development purposes. The justification for this allocation is outlined in the SHLAA which can be viewed at www.redditchbc.gov.uk. Based on 65% of the land mass being developed (5.35ha) for housing at 30 dwellings per hectare, the estimated capacity of the site is for 160 dwellings.

However, this total does not account for the fact that the site has also been deemed suitable for employment purposes, specifically offices. The Employment Land Review makes reference to the emerging West Midlands Regional Spatial Strategy policy and the need for any office development outside of the town centre to be no more than 5000 sq.m, unless it can be justified that a larger amount is required. Therefore, it is necessary to deduct 0.5ha from the total land mass to be set aside for employment purposes, which leaves a total land mass of 6.5ha. Based on 65% of this 6.5ha being developed (4.85ha) for housing at 30 dwellings per hectare, this amounts to **145 dwellings**.

At this stage, there is the potential for a variety of options to be developed on the Land to the Rear of Alexandra Hospital. For example, the site could be used solely for housing; a mix of employment and housing; a predominant focus on employment uses and some housing; or a mix of use incorporating housing and employment. Therefore this would ultimately impact upon the capacity of this site.

**Main Pros and Cons of Development**

The main positive and negative aspects of development are summarised below.

| Positive aspects of potential development | Negative aspects of potential development |
|---|---|
| • In terms of the land owned by health related bodies, there is willingness for the land to be developed.<br>• No major infrastructure is considered to be required to serve the development.<br>• Topography of the site is suitable for development.<br>• Adjacent uses include residential, school and Hospital. These would not be in conflict with residential or office-related development.<br>• Market appraisal of the site carried out as part of the Employment Land Review deemed it suitable for employment use.<br>• SPD establishes that a road off Nine Days lane could serve the development. | • Several respondents to the Preferred Draft Core Strategy noted that the land and its environs is of a high environmental quality e.g. Wildlife Woods are adjacent to the site and this is designated as a Site of Special Scientific Interest (SSSI). Therefore, consultation is required with the Biodiversity Officer and consideration needs to be given to biodiversity issues for any development on the site.<br>• New Town Tree Preservation Order No.27 covers the site.<br>• Contaminated Land: Consultation with Environmental Health deemed that a Site Investigation would be required to determine if there was any contaminated land.<br>• With the exception of the northern end of the site, development |

| | |
|---|---|
| • Planning Policy historically has identified the potential for development on the land, particularly for employment purposes.<br>• SPD establishes that the site has immediate access to utility services.<br>• The SPD has established the principle for SUDS to be incorporated as part of the development; this is considered to add to the sustainability of the site. | exceeding two storeys would be considered to create an overbearing impact on the Green Belt to the south and housing in the east.<br>• Land to the south of the site is within district of Stratford-on-Avon. Given the Green Belt designation and landscape value of this land, any development in this area needs to be sensitively designed to accommodate these factors.<br>• A sewer runs across the site. Consultation with Severn Trent identified that development should not occur on the sewer nor 5 metres either side of the sewer. |

Historically, the Land to the Rear of Alexandra Hospital Site has been progressed through planning policy with the aim of being used for development, particularly for employment purposes. Now, there is a need for the Borough to identify land to meet the needs of future development requirements and the research surrounding the Land to the Rear of Alexandra Hospital highlights the potential for development to occur on this site. However, it is clear that further work needs to be undertaken to identify the ideal end uses that should be accommodated on site. It is anticipated that local consultation will assist with determining these end uses.

## 4. Justification for releasing ADR land for development

The development targets set for Redditch Borough in the RSS Phase Two Panel Report require the use of the three areas currently designated as ADR, as well as the two parcels of Green Belt at Brockhill and Foxlydiate. Having demonstrated and accepted the limited capacity for development in Redditch, these sites are required to meet the Borough's development targets. The Panel Report states that where land has been identified for release from the Green Belt, and it has been established that this land is the most sustainable option, it should not be necessary for the principle of development on these sites to be subject to further tests of sustainability. A number of further reasons for the release of ADR land are detailed below.

The principle of ADRs was established by Planning Policy Guidance Note 2 (para 2.12 and Annex B). PPG2 allows for land to be safeguarded between the urban area and the Green Belt which may be required to meet longer-term development needs. There are three defined 'Areas of Development Restraint' (ADRs) within Redditch Borough, known as the A435 corridor, Brockhill and Webheath. The ADRs were first designated in the Borough of Redditch Local Plan No.2 for the purposes of accommodating the long term growth needs of the Borough and, in the case of the A435 ADR, to accommodate the then-planned Studley Bypass. These designations were carried forward to the Borough of Redditch Local Plan No.3, which forms part of the current development plan for the Borough.

Policy B(RA).3 'Areas of Development Restraint' of Local Plan No.3 states that "ADR will be safeguarded to meet possible longer term development requirements beyond the year 2011" and defines the ADRs as "…locations that could achieve balanced communities and with regard to minimising the need to travel would be comparable with other existing areas in Redditch.".

Local Plan No.3 Policy CS.7 – The Sustainable Location of Development sets out the sequential approach to the location of all development. In short, the policy establishes the following sequential approach:

i) urban brownfield land
ii) urban greenfield land
iii) Areas of Development Restraint

The Borough Council is now preparing a Core Strategy DPD and, based on the RSS Phase 2 revision Panel Report, will need to accommodate 4,000 dwellings within the Borough. At the time of writing this Background Paper, the Proposed Changes to the RSS were not available.

It is clear from the Strategic Housing Land Availability Assessment (SHLAA) that there is insufficient land within Redditch's urban area to meet the Regional Spatial Strategy (RSS) housing target for Redditch of 4000 additional dwellings between 2006 and 2026. It is also evident in the Borough Council's Employment Land Review that the Borough cannot accommodate all of its employment targets within the Borough, hence the designations in the RSS Panel Report.

Taking account of existing completions, current commitments and sites positively identified in the SHLAA, the urban area of the Borough has sufficient land identified for **1936 dwellings**. This includes an allowance for windfall dwellings for the last 10 years of the plan period of 180 dwellings.

It has been demonstrated that the land to the rear of the Alexandra Hospital and the three Areas of Development Restraint (ADRs) at A435, Brockhill and Webheath

offer the opportunity to consider additional residential provision of about **1495 dwellings**.
**Thus, 1936 + 1495 = land for 3,431 dwellings to contribute towards the housing target for Redditch.**

In order to accommodate the remaining balance, two parcels of Green Belt land to the northwest of Redditch, within the Borough boundaries, have been identified. Please see part 5 of this document for more information on the release of Green Belt for development.

Following public consultation on previous stages of the Core Strategy, the outcome of Sustainability Appraisal and taking into account RSS policies and Government policy on Green Belt and Housing, it has been concluded that the Core Strategy will include a Development Strategy to guide development within the Borough. The development strategy (as shown in the policy in part 2 of this document) will take the following approach:

- brownfield land within the existing settlements (including strategic sites)
- greenfield land within the existing settlements (including strategic sites)
- Designated ADRs at Webheath, Brockhill and the A435
- Two parcels of Green Belt to the northwest of Redditch within the Borough Boundary

The Structure Plan Policy which established the principle of designating ADR in Worcestershire is no longer saved, however the Explanatory Memorandum to Policy D.41 states that:

> *"The Green Belt boundary should not be redefined to include those ADRs that fail to meet the sustainability criteria in local plan reviews because their original identification as ADRs indicates that the land does not serve the purposes of including land in the Green Belt as set out in PPG2."*

In conclusion, it has been demonstrated from previous studies and Inspectors' reports that development on the three ADRs within Redditch Borough is acceptable in planning terms.

## 5. Justification for releasing Green Belt land for development

The development targets set for Redditch Borough in the RSS Phase Two Panel Report requires the use of the three areas currently designated as ADR, as well as the two parcels of Green Belt at Brockhill and Foxlydiate. Having demonstrated and accepted the limited capacity for development in Redditch, these Green Belt sites are required to meet the Borough's development targets. The Panel Report states that where land has been identified for release from the Green Belt, and it has been established that this land is the most sustainable option, it should not be necessary for the principle of development on these sites to be subject to further tests of sustainability. A number of further reasons for the release of Green Belt land are detailed below.

Current contributors towards the Regional Spatial Strategy housing target for Redditch of 4000 additional dwellings between 2006 and 2026

It is clear from the Strategic Housing Land Availability Assessment (SHLAA) that there is insufficient land within Redditch's urban area to meet the Regional Spatial Strategy (RSS) housing target for Redditch of 4000 additional dwellings between 2006 and 2026, necessitating the potential release of Green Belt land for development.

Taking account of existing completions, current commitments and sites positively identified in the SHLAA, the urban area of the Borough has sufficient land identified for **1936 dwellings**. This includes an allowance for windfall dwellings for the last 10 years of the plan period of 180 dwellings. These will more than likely take the form of sub-divisions, i.e. conversions of houses into flats.

It has been demonstrated that the land to the rear of the Alexandra Hospital and the three Areas of Development Restraint (ADRs) at A435, Brockhill and Webheath offer the opportunity to consider additional residential provision of about **1495 dwellings**.

**Thus, 1936 + 1495 = land for 3,431 dwellings to contribute towards the housing target for Redditch.**

Taking these figures into account, Redditch still has a shortfall of identified land for 569 dwellings to meet its housing target.

Two additional sites currently designated as Green Belt in the northwest of the Borough offer the opportunity to contribute a further **90 dwellings** towards meeting the housing target. However, their availability for development is currently questionable and reliance on their contribution to the housing target would be unrealistic at this stage.

There may be the opportunity of additional capacity amounting to land for around **120 dwellings** on sites in a near to the Town Centre. However, the availability of these sites for housing uses is very much dependent on the priority of other uses such as Town Centre retail and office space. At this stage, it would be presumptuous to include them in the contribution towards housing capacity in the Borough.

If it is assumed that the contentious sites identified in paragraphs 1.5 and 1.6 above are able to contribute towards the housing target, Redditch still has a shortfall of 359 dwellings. Realistically, it can be concluded from these calculations, that there is a **shortfall within Redditch of land for 569 dwellings**, which necessitates the release of some Green Belt land within the Borough.

West Midlands Regional Spatial Strategy – Phase Two Revision – Draft Preferred Option – December 2007

The RSS Phase Two Revision acknowledges the necessity for some Districts in the Region to look towards the Green Belt to meet their housing targets. This is reflected in the revision to the Spatial Strategy Objectives (para 3.9, p.32).

> *"d) to retain the Greenbelt but to allow 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."*

Policy CF4 – Phasing of new development supports Objective (d) and states:

> *"D. Only where insufficient sites on previously developed land, in sustainable locations, are available to meet the housing trajectory (including the expected contribution from windfall sites) should greenfield sites be released*
> *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"* (p.79)

The housing provision calculation in Section 1 and detailed scrutiny of the SHLAA, clearly demonstrate that:

- There is insufficient brownfield land within the Borough;
- An appropriate windfall allowance in accordance with guidance in PPS3, para. 59 has been included within the provision.

Having considered these elements of criterion D above, it is appropriate for greenfield land within the Borough to be considered to contribute towards the housing target. However, given the calculation in Section 1, detailed scrutiny of the SHLAA and consideration of the contribution to be made by the Land to the Rear of the Alexandra Hospital and the three ADRs, it is justifiable to conclude that there is still insufficient land available within the urban area of the Borough to meet the housing target.

This analysis fully adheres to the approach identified in Criterion D of RSS Policy CF4, and thus, the release of Green Belt land (Policy CF4, Criterion E) is considered a necessity for Redditch to meet its housing target.

West Midlands Regional Spatial Strategy – Phase Two Revision – Report of the Panel – September 2009

The Panel Report recommends the deletion of RSS Policies CF4 and CF10, to be replaced with a new Policy CF4 – Phasing and managing land for housing. The recommended replacement Policy CF4, criterion C states:

> *"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."*

In line with this recommended change to Policy CF4, it is considered appropriate that the approach to the identification of land to contribute towards the housing target still necessitates the release of Green Belt land within the Borough.

It should however be noted that the recommendations of the Panel are just that – recommendations. The proposed changes to the RSS by GOWM are imminent and any deviation from the Panel's recommendation for Policy CF4 will be addressed as soon as possible by the Borough Council.

Borough of Redditch Local Plan No.3 – May 2006

Policy CS.7 – The Sustainable Location of Development, criterion iv states:

> *"in exceptional circumstances, when all the options for locating development set out above, in sustainable locations, have been exhausted and where there exists a clear development need, consideration of locations adjacent to the Redditch urban area on land currently designated as Green Belt, but where the purposes for which Green Belts were designated would not be compromised."*

The Local Plan Inspector issued a change to the policy's Reasoned Justification, which is particularly pertinent to the situation that Redditch Borough Council finds itself in. Paragraph 7 of the Reasoned Justification states:

> *"7. This Plan will be saved for a period of three years from adoption, but it is intended that its core strategy and policies will remain extant until 2011. The Council intends to review its policies before 2011 but that review is reliant upon the publication of the results of work to be carried out at a regional level. The Council has no control over that publication date and as a consequence, if needed, the sequential order applied by this Policy will remain effective for the post 2011 period."*

It is considered that the approach to the release of Green Belt land within Redditch Borough at this time is consistent with this policy which is current, effective for an indefinite period, and has addressed the future development needs of Redditch.

Planning Policy Guidance 2: Green Belts – January 1995

The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. Green Belts can shape patterns of urban development… and help to ensure that development occurs in locations allocated in development plans… They can assist in moving towards more sustainable patterns of urban development. (PPG2, para 1.4)

There are 5 purposes of including land in Green Belt:

i) to check the unrestricted sprawl of large built-up areas;
ii) to prevent neighbouring towns from merging into one another;
iii) to assist in safeguarding the countryside from encroachment;
iv) to preserve the setting and special character of historic towns; and
v) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land. (PPG2, para 1.5)

With respect to the justification of the release of Green Belt land within Redditch against the purposes of Green Belt outlined in PPG2, the following factors are relevant to demonstrate the exceptional circumstances faced in Redditch. The five comments below align with the five purposes of land in the Green Belt (above) from PPG2:

i) There is insufficient capacity within the urban area to meet the housing target. Redditch's urban area needs to expand to accommodate this shortfall. However, land released from the Green

Belt will be carefully identified to minimise unrestricted urban sprawl and encourage development in the most sustainable locations;

ii) The level of development to be accommodated within the Green belt would not compromise neighbouring settlements with respect to them merging into one another. It is anticipated that release of land would only encroach into the Green Belt by around 500m. There would be little prospect of Redditch merging with the nearest settlements at Rowney Green, Tardebigge and Alvechurch and minimal impacts on these settlements;

iii) See comments at (i) above;

iv) This criterion is not applicable to Redditch;

v) Redditch has recycled and re-used as much land in its urban area as possible, as demonstrated in the SHLAA. However, there is still a shortfall in the housing target to address.

The Green Belt in Redditch is predominantly within an area of high landscape value. However, PPG2, para 1.7 states that:

> *"the quality of the landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection."*

Therefore, high landscape value should not preclude Redditch Green Belt land from release to meet development needs.

In terms of protection it is argued that: *"The essential characteristic of Green Belts is their permanence. Their protection must be maintained as far as can be seen ahead."* (PPG2, para 2.1). Since its detailed identification in the Hereford & Worcester County Council Green Belt Local Plan (1982), the permanence of the Redditch Green Belt has been protected, and development resisted within it, up to this point in time,.

*"Regional and strategic planning guidance set the framework for Green Belt policy… including the direction of long-term development."* (PPG2, para 2.2) The RSS Phase Two Revision acknowledges the need for Redditch-related growth to be accommodated in neighbouring districts due to insufficient land availability within the Borough, and clearly identifies the direction of Redditch's long-term development needs (Policy CF3, footnote e, p.74). This direction for long-term development is further substantiated by the RSS Phase Two Panel Report which recommends changes to Policy CF3 and its footnote, and states that: *"Around 4,000* [dwellings] *within the Borough and around 3,000* [dwellings] *in Bromsgrove District adjacent to the Redditch boundary."* (Panel Report, p.83).

The RSS Panel recommends a new Policy SS11 (Panel Report, p.226) which states *"Green Belt alterations will be required within Redditch… to meet the housing provision."* It is considered that the framework for Green Belt release has been succinctly set at the strategic level allowing for the detail to be determined at the local level.

With regard to development on Green Belt land notable comments include: *"Once the general extent of a Green Belt has been approved, it should only be altered in exceptional circumstances."* (PPG2, para 2.6). *"Where existing local plans are being revised and updated, existing Green Belt boundaries should not be changed unless alterations to the structure plan have been approved, or other exceptional circumstances exist which necessitate such revision."* (PPG2, para 2.7).The fact that Redditch's urban area has insufficient available capacity to meet its long-term growth needs, coupled with the fact that the Green Belt boundary is drawn tightly

around the urban area, are considered exceptional circumstances for the release of Green Belt land to meet strategically identified development needs.

The current Green Belt boundary surrounding the Redditch urban area was identified in detail almost 30 years ago. It is considered that sufficient long term provision was made to ensure the permanence of the Green Belt for as far as could be foreseen, based upon the growth projections for Redditch as a New Town.

In terms of sustainability, it is stated that: *"When drawing Green Belt boundaries in development plans local planning authorities should take account of the need to promote sustainable patterns of development."* (PPG2, para 2.10). The results of the Sustainability Appraisal accompanying this Consultation period (February 2010) show that the areas proposed for release from Green Belt within Redditch, offer the most sustainable directions for growth. Amongst other things, these areas of Green Belt land are close to major road infrastructure and would feed into the Spernal Sewage Treatment Works.

PPG2 states that: *"When local planning authorities prepare new or revised structure and local plans, any proposals affecting Green Belts should be related to a time-scale which is longer than that normally adopted for other aspects of the plan. They should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the plan period. In order to ensure protection of Green Belts within this longer time-scale, this will mean safeguarding land between the urban area and the Green Belt which may be required to meet longer-term development needs."* (PPG2, para 2.12).

It is considered that, if the Green Belt to the southwest of Redditch's urban area, within the Borough boundary, was suitable for development, the RSS Phase Two Revision and the Panel of Inspectors would not have identified a need for cross-boundary provision to meet Redditch's growth needs. Thus, it could be deemed that when the 4,000 dwelling target has been completed, Redditch is full to capacity. Therefore, in relation to para 2.12 of PPG2, it is considered that officers from Redditch Borough Council and Bromsgrove District Council will need to work closely to identify suitable land for Green Belt release within Bromsgrove District.

## 6. Discounted Options

When considering how to accommodate 4000 dwellings within Redditch Borough, a number of options were examined. After thoroughly investigating all of these options, Redditch Council concludes that there is only one reasonable option, as presented in the draft policy on part 2 of this document. The four alternative options have therefore been dismissed from inclusion in the consultation. These four options are considered less sustainable than the preferred option and the descriptions below cover the central premise of the options as well as the main reasoning behind their exclusion.

**Option - To extend the Webheath Area of Development Restraint into the southwest Green Belt.**
This option would involve developing and extending the Webheath ADR into the southwest Green Belt. This location has the potential to minimise the need to travel as it could link into any potential development at the Webheath ADR, which adjoins the urban area of Redditch. However, this option has been discounted as the landscape in this area is considered to be of a high and sensitive nature. Furthermore, there are significant infrastructure constraints preventing this option being implemented without significant investment.

**Option - To develop a brand new settlement in the southwest Green Belt**
This option would involve locating a brand new settlement within the southwest Green Belt area of Redditch Borough. The benefit of this option would be that it provides the flexibility to choose the precise location of a new settlement in this area. Locating development in the Green Belt may also improve the commercial viability of service provision.

This option has been explored thoroughly in the past (during the preparation of Local Plan No. 2) and has been discounted for a number of reasons, including the need for a significant amount of foul drainage improvements; the lack of community facilities within this area and; the unsustainable nature of any development allocated in this area, due to the amount of transport infrastructure that would be required as well as the potential for large losses of Green Belt land.

Both the first option – to extend the Webheath ADR into the southwest Green Belt – and the second option – to develop a brand new settlement in the southwest Green Belt - outlined above would require the release of Green Belt land to the south west of Redditch. The Council has published a 'Study of Green Belt Land and Areas of Development Restraint within Redditch Borough' (October 09) which examines the planning policy history of this area of Green Belt. The southwest Green Belt was considered for development in great detail during the preparation of, and Inquiry into, Local Plan No.2, and there have been several studies including the Redditch Joint Study of 1988 and the White Young Green Stage 1 Report which have concluded that this area is not suitable for development. The constraints and sensitivities to development in the southwest Green Belt are summarised as follows:

- Development would require the pumping of sewage which is not compatible with sustainable development objectives;
- There are prominent ridges in this area which would make development visible from a considerable distance and little could be done to mitigate the adverse visual impact of development. The topography would also limit the type of development that could be accommodated in this area;
- There is a general lack of community facilities within the area and it is remote from the Town centre, railway station and other amenities;

- The existing roads in the area are inadequate to serve large scale development. A significant amount of new transport infrastructure would be necessary and would be a further intrusion in the area;
- This area is considered to have landscape of a high value and sensitive nature and extending the development here would result in the loss of this landscape;
- Mineral reserves of sand and gravel deposits have been identified in this area;
- Bow Brook, Swans Brook and Elcocks Brook are within an area identified as being relatively rich in minor ecological features.

For the reasons listed above and the detailed reasons in the 'Study of Green Belt Land and ADRs within Redditch Borough', it is considered that there are significant and indisputable reasons why land in the southwest Green Belt should not be released for development.

**Option - Extend the existing settlements (Astwood Bank and/or Feckenham) into the Green Belt.**

This option would involve expanding the built-up area of Astwood Bank and / or Feckenham significantly into the southwest Green Belt. The main advantage of this option is that the commercial viability of services could be increased. However, this option has been discounted for a number of reasons, including all of the reasons against development in the southwest Green Belt relating to the two options above which can be extended to the Green Belt land surrounding both Astwood Bank and Feckenham. In particular, the topography of Astwood Bank may make development difficult. Also, development in either of these locations may affect Conservation Areas and Listed Building designations. Development to the north of Astwood Bank would result in the coalescence with Redditch which would be contrary to the principles of PPG2. The Settlement Strategy contained in the Preferred Draft Core Strategy states that Redditch, as the Main Settlement shall be the focus for development. Significant development in and around Astwood Bank and Feckenham, therefore, would be contrary to the principles of the Settlement Strategy.

**Option - Develop all of the open space within the Borough.**

This option would guide all new development within the existing urban area. The option to develop all of the open space within the Borough would reduce the need to travel as the land is within the urban area of Redditch ensuring that these locations are accessible and close to existing facilities and services. However, this option would significantly reduce the amount of open space available within Redditch, which is one of its locally distinctive features. The open spaces make a significant contribution to the townscape and reflect the distinctive New Town master plan principles that give Redditch its character. This option also presents significant environmental concerns; in particular development would likely result in the loss of wildlife and habitats. In terms of recreation, development of the open spaces would result in a reduction in amenity space, which has a high recreational value. Locating new communities within the open spaces in the Borough would also increase densities in urban areas. As highlighted in the study 'Open Space Standards in the Borough' (March 2009), many sites of archaeological interest are now largely contained within designated areas of Primarily Open Space. The study concludes that this designation was undoubtedly partly fundamental in the justification for above average provision of open space in the Master Plan and 'on the ground' in the Borough. For these reasons, development on Open Spaces has been discounted as an option.

At this stage, the Council considers that the options presented in this part of the document are less sustainable than the sites presented in part 3. However, if you have any comments to make on these options please submit them during the consultation period.

## 7. Flexibility to deal with changing circumstances

National Planning Policy requires Core Strategies to be able to deal with changing circumstances:

*"Plans should be able to show how they will handle contingencies: it may not always be possible to have maximum certainty about the deliverability of the strategy. In these cases the core strategy should show what alternative strategies have been prepared to handle this uncertainty and what would trigger their use. Authorities should not necessarily rely on a review of the plan as a means of handling uncertainty." (PPS12 para 4.46)*

The phase two revision of the WMRSS has not yet been finalised; the housing and employment figures quoted in this document are based on the Panel Report and the Secretary of State has not yet published any suggested changes. Therefore, there is still some level of uncertainty regarding the level of housing and employment Redditch Borough will need to provide (both within the Borough and in adjacent Districts).

As stated previously in this document, the development capacity of Redditch Borough is limited and, consequently, so is the level of flexibility that can be built in to the proposed development strategy. However, there is scope to accommodate more houses on the A435 ADR than is suggested for the site in part 3 of this document. Although plots 3 and 4 of the ADR are considered best suited to employment development, these plots could be used for residential development. Based on the same calculation used earlier of 65% developable area at 30dph, these plots could have a capacity of around 200 houses. There is also the potential to increase the capacity of sites already identified as suitable for housing development by increasing the density. In terms of the employment target, currently, more land has been identified within the Borough than would be required to meet the target set in the RSS Panel Report. This allows a level of flexibility should any of the identified sites become undeliverable for any reason. The draft policy also builds in flexibility by stating that Supplementary Planning Documents may be produced in order to bring sites forward if the required rates of housing delivery are not being achieved.

## 8. Conclusion

This document is intended to provide a background to the sites that the Council considers the most sustainable options for delivering the regional housing and employment targets set for *within* Redditch Borough (i.e. 4000 dwellings and 31ha of employment land).

The draft policy in part 2 of this document conforms with the emerging RSS in terms of the levels of housing and employment the Borough will deliver within its boundaries. The proposed strategy also follows RSS guidance by proposing the release of Green Belt land in the Borough and in neighbouring districts to meet development targets.

All of the sites presented in part 3 of this document are, at this stage, considered suitable for development and capable of being brought forward. The evidence presented for each of the sites, drawing on the evidence base documents for the Core Strategy, make suggestions on the considerations that should be taken in the delivery of these sites. These sites are considered the best and most sustainable option for accommodating the targets set for the Borough. Part 6 supports the allocation of development to those sites outlined in part 3, by highlighting the other options that have been considered and demonstrating the compelling reasons for their exclusion.

Justification has been provided for the release of ADR and Green Belt land in the Borough to meet development targets and this approach is confirmed by the RSS Panel Report (para 4.18). Although limited, a level of flexibility has been built into the policy and the approach of the development strategy.

**Have your say**

The Council considers that this is the most sustainable approach to a development strategy for the Borough, but we would like to hear your views. You can submit your comments on the sites mentioned in this document and the draft policy to:

Redditch Borough Council
Development Plans
Town Hall
Walter Stranz Square
Redditch
Worcestershire
B98 8AH

Or email: devplans@redditchbc.gov.uk

Please let us have your views by 22nd March 2010.