

SEPTEMBER 2013

Borough of Redditch Local Plan No.4 Statement of Consultation (Regulation 19 Statement)

Proposed Submission



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STATEMENT OF CONSULTATION (SEPTEMBER 2013)

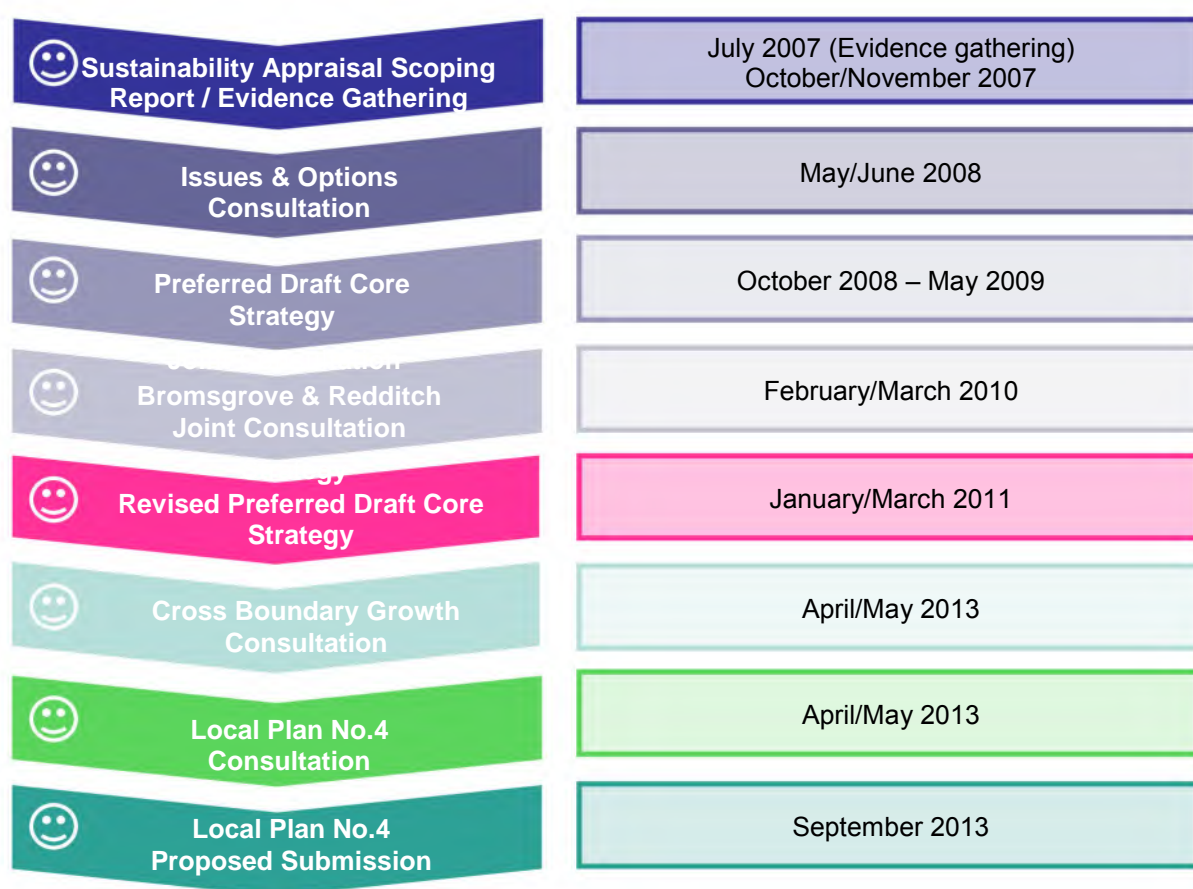
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Introduction

This Statement of Consultation has been prepared in support of the Proposed Submission of Borough of Redditch Local Plan No.4 (formerly known as the Core Strategy) in accordance with the Planning and Compulsory Purchase Act 2004 (as amended) and The Town and Country Planning (Local Planning) (England) Regulations 2012. The Proposed Submission version of the Plan has been developed over a number of years and has benefitted from a number of stages of consultation. This statement explains how Redditch Borough Council has undertaken community consultation and stakeholder involvement at each of the following stages:



For each stage of consultation, this statement outlines which bodies and persons were invited to make representations on the preparation of the Plan, how these bodies and persons were invited to make representations, a summary of the main issues raised by those representations, and how these main issues have been addressed in the Plan. The General and Specific Consultation Bodies consulted at each stage of the Plan are listed in Appendices 1 and 2.

Sustainability Appraisal Scoping Report/Evidence Gathering (June 2007-April 2008)

Between 18th June 2007 and 21st April 2008 a series of informal consultation and information gathering events took place where consultees were asked to identify 'issues' relating to the Borough. While there was no statutory requirement to undertake consultation at this stage, the Borough Council organised/attended the events detailed below.

Consultation Involvement and Engagement

State of the Borough Conference

The State of the Borough Conference was held on Monday 18th June 2007 at Redditch Town Hall. The event comprised a series of talks, discussion groups and presentations. The primary purpose of the Conference was to bring together members of the Redditch Partnership and associates to explore the ways in which the Sustainable Community Strategy should be updated as well as generating issues that could be tackled by the emerging development plan.

Participants were asked to complete a questionnaire (see Appendix 3) which was split into the six themes of the Community Strategy. Under each theme respondents were asked to write down issues about Redditch Borough that could be considered in the development plan along with evidence to support this.

Planning Advisory Panel (PAP) Meetings

Planning Advisory Panel comprises Elected Members and are also attended by Development Plans officers. PAP meetings were held between 4th September 2007 and 16th April 2008 during which Members were asked to identify issues that they thought were relevant to Redditch Borough.

Local Democracy Week Event

On Monday 15th October 2007 students from local high schools attended the Local Democracy Week Event at Redditch Town Hall to learn about democratic processes in Redditch Borough. Members of the Development Plans team attended and discussed with students the improvements they would like to see in Redditch Borough. The questions asked of students can be seen in Appendix 4.

Meeting with the Redditch Student Council

On Wednesday 7th November 2007 a member of the Development Plans team attended a meeting with the Redditch Student Council to discuss the production of the new Core Strategy Development Plan. The Student Council were informed that both residents and stakeholders from local businesses/organisations were being invited to attend discussion panels in order to help identify planning issues relating to the Borough. Student Council members were invited to attend and all members agreed to display publicity material related to the panels at their schools.

Citizen and Stakeholder Discussion Panels

A series of citizen and stakeholder discussion panels were held between 15th November 2007 and 17th January 2008. The discussion panels provided the opportunity for citizens, stakeholders and statutory bodies to identify planning issues across the Borough. Details of the topics covered and the dates of the discussion panels are listed in the table below:

Date	Discussion Panel
15 th November 2007	'Economy' Citizen and Stakeholders Discussion Panel
22 nd November 2007	'Health and Well Being' Citizen and Stakeholders Discussion Panel
30 th November 2007	'Communities and Young People' Citizen and Stakeholder Discussion Panel
11 th December 2007	'Better Environment' Citizen and Stakeholder Discussion Panel
8 th January 2008	'Development Strategy' Citizen Discussion Panel
10 th January 2008	'Development Strategy' Stakeholder Discussion Panel
15 th January 2008	'Housing and Climate Change' Citizen Discussion Panel
17 th January 2008	'Housing and Climate Change' Stakeholder Discussion Panel

The discussion panels were advertised in a number of ways:

- All those on the Development Plans database were written to on 14th September 2007 (either by post or e-mail) to advise them of the discussion panels (the letter can be seen at Appendix 5). Also enclosed was a leaflet (Appendix 6) which detailed the purpose of the sessions, who should attend, what is expected of participants, where and when the discussions panels would take place and a response form.
- A4 posters were displayed on notice boards in Council owned buildings across the Borough. These were displayed from 14/09/07 – 29/10/07 (Appendix 7)
- A display at Planning Reception, Redditch Town Hall (with leaflets) 14/09/07 – 29/10/07.
- A press release appeared in the 'Redditch Standard' on Wednesday 26th September 2007 inviting residents and stakeholders to join the discussion panels. (Appendix 8)

Planning Information Day

Planning Information day was held on Thursday 10th April 2008, from 10am to 9pm at Redditch Town Hall. This event was organised to give local residents and anyone else interested in planning the opportunity to find out about the planning process in Redditch Borough. Presentations were given at 11am, 1pm, 3pm, 5pm and 7pm during which the Issues and Options consultation was introduced. Attendees were informed of the purpose of the consultation and the dates that it was taking place. Planning Information Day was advertised in the following ways:

- Press releases in the Redditch Standard, Friday 4th April 2008 and Redditch Advertiser Wednesday 9th April 2008 (Appendix 9).

- Local residents, businesses and organisations on the Development Plans consultation database were sent an A5 postcard inviting them to the event. (Appendix 10)
- A4 posters were displayed on notice boards in Council owned buildings across the Borough (Appendix 11).

Summary of main issues and how these have been addressed

The Borough Council found the early consultation, through the above events, a useful tool for identifying some planning issues that need to be addressed in the Plan. The outcome of this informal consultation and the issues raised were used, where appropriate to inform the Issues and Options document and these can be found in Appendix 12.

Issues and Options Consultation (May-June 2008)

Core Strategy Issues and Options was the first formal stage of the plan process and was on consultation at the same time as the draft Sustainable Community Strategy (9th May – 20th June 2008). The Issues and Options document highlighted the issues relevant to Redditch Borough and gave options on the way that these issues can be tackled through local planning policies.

In accordance with Redditch Borough Council's Adopted Statement of Community Involvement (SCI) (Appendix 13), the consultation process undertaken satisfied all of the minimum requirements of the SCI. The section below details the public consultation that was undertaken in conformity with the SCI.

Consultation Involvement and Engagement

For this consultation period, letters/emails were sent to everyone on the Development Plans consultation database, all statutory consultees and any other parties that the Borough Council considered to have an interest in the Issues and Options Document. The correspondence detailed the role of the future Core Strategy and all of the consultation activities known at the time (a copy is attached in Appendix 14).

Document Availability

Issues and Options Documents (including the supplementary questionnaire) and Sustainable Community Strategies, together with any supporting documentation, were available for inspection during the consultation period at the following locations:

- Planning Reception, Redditch Town Hall
- Redditch Library
- Mobile Library
- Woodrow Library
- Redditch One Stop Shops

Additionally, all documents were placed on the Redditch Borough Council website. There was also an opportunity for people to fill out the Issues and Options questionnaire online.

Posters

Posters were placed on all Redditch Borough Council notice boards during the consultation period (a copy of the poster can be seen at Appendix 15).

Consultation Calendar

The consultation period for the Sustainable Community Strategy and the Issue and Options Consultation period also featured on Worcestershire County Council's online consultation calendar.

Newspaper Advert

An advert was placed in The Standard on Friday 2nd May 2008 (the advert is the same as the poster and can be seen at Appendix 15).

Displays and Exhibitions

A number of displays and exhibitions (Appendix 16) were organised at various locations in the Borough and were held on a range of days and at different times to ensure people could attend. Details of the exhibitions are listed in the table below:

Date	Time	Location
Friday 9 th May 2008	10 am–4 pm	Redditch Town Hall
Saturday 17 th May 2008	9.30 am-5 pm	Redditch Library
Tuesday 20 th May 2008	10 am-3 pm	Sainsbury's
Thursday 22 nd May 2008	7 pm – 9 pm Presentation (7.30 pm)	Redditch Town Hall
Thursday 29 th May 2008	10 am-4 pm	Arrow Valley Countryside Centre
Friday 6 th June 2008	10 am-3 pm	Morrisons
Monday 9 th June 2008	9 am -5.30 pm	Kingfisher Shopping Centre
Tuesday 10 th June 2008	7 pm – 9 pm Presentation (7.30 pm)	Redditch Town Hall

There were also displays at the Town Hall and Palace Theatre for the length of the consultation period.

Neighbourhood Groups

The documents under consultation were allocated as 'talk of the town items' on all Neighbourhood Group Agendas. A planner attended each meeting to discuss and answer any questions regarding the consultation period. The neighbourhood groups that were attended by members of the Planning team are listed in the table below:

Date	Neighbourhood Group
Mon 2nd June 2008	Central and Southcrest/PACT
Mon 2nd June 2008	Headless Cross/PACT
Wed 4th June 2008	Abbeydale, Abbey Park, Riverside & Town Centre/PACT
Wed 4th June 2008	Greenlands, Woodrow & Wire Hill/PACT
Mon 9th June 2008	Winyates & Winyates Green/PACT
Mon 16th June 2008	Lodge Park, Lakeside/St. Georges/PACT
Mon 16th June 2008	Webheath/PACT
Wed 18th June 2008	Matchborough/PACT
Mon 23rd June 2008	Batchley & Brockhill/PACT
Mon 23rd June 2008	Crabbs Cross, Callow Hill & Walkwood/PACT
Mon 23rd June 2008	Oakenshaw/PACT
Tue 24th June 2008	Astwood Bank/PACT

Newspaper Articles

Two newspaper articles were issued in The Standard (a local newspaper) during the consultation period. One on the 9th May 2008, entitled 'Town's blueprint for a safer future' and another on the 30th May 2008, entitled 'Have your say on how to develop the town' (copies of these articles can be seen in Appendix 17).

Summary of main issues and how these have been addressed

In total 97 representations were received on the Issues and Options consultation document. Each representation was logged by the Development Plans team and allocated to an Officer who assessed the representation and considered whether any action was required. If an action was required, this was either a change to policy, further consultation with the individual/organisation that submitted the representation or the representation was passed to another Council department if the representation was not related to planning.

The representations were summarised and presented in the same order as the questions in the questionnaire which accompanied the consultation document. The summarised responses were responded to by Officers; this was subsequently endorsed by Members at the Council's Executive Committee and Full Council. Appendix 18 contains a table including a summary of the responses received, an Officer response to the comments and a related recommended action where a change can be identified.

The responses had the benefit of being guided by a questionnaire; therefore it was considered a successful consultation period because it was possible to draw out views on a number of areas.

There were over one hundred unique comments about the draft vision and objectives presented in the Issues and Options Document. In response to these, specific changes were made to clarify the purpose of the vision such as references to Redditch's green credentials and zero carbon developments and a new objective on landscape was recommended.

The questionnaire asked where future development should be concentrated in Redditch. The response was very mixed and there were many suggestions for additional/alternative locations for development.

A substantial response was made to the question about how the Town Centre's vitality and viability should be maintained. 35 responses asked for Redditch Town Centre to be placed at the top of a Hierarchy of Centres, as the preferable location for major retail developments, uses which attract large numbers of people and large scale offices.

One of the key issues for the Borough to tackle is related to the former New Town District Centres; the questionnaire asked how these centres could be improved. The two most popular approaches to this were, firstly to encourage redevelopment and regeneration of all District Centres built during the New Town era, providing for the needs of the existing and the likely future local communities. Second was to set a limit to the number of hot food takeaways in each District Centre so that they maintain their role and function to provide variety and choice to communities. Both of these were taken forward and developed into policy.

Regarding open space in Redditch, the majority of respondents stated that the distinctive high levels of open space should be maintained and not built on.

Housing density also attracted a lot of responses, with respondents either suggesting a character based density range for different Districts within Redditch (of between 30 – 70 dwellings per hectare) or the alternative of 30 dwellings per hectare for Astwood Bank and Feckenham, 30 – 50 dwellings per hectare in Redditch urban area, with the Town and District Centres being 70 dwellings per hectare. The latter option was deemed to be the most flexible approach to develop into policy.

Overall, the responses received were very focussed because many of the respondents utilised the questionnaire supplied by the Council. This was particularly helpful to understand the volume of response to proposed policy approaches to deal with a particular issue. Offering a diverse and continued consultation opportunity has added considerable value to the development of the Core Strategy so far and this consultation in respect of the Issues and Options document was considered a successful process.

Preferred Draft Core Strategy (October 2008-May 2009)

The consultation period for the Preferred Draft Core Strategy began on 31st October 2008 and ended on 8th May 2009. The Preferred Draft Core Strategy was a draft version of the Borough Council's Core Strategy Development Plan Document (DPD). It was prepared in regard to the regulation changes in June 2008; therefore the document explains its association to the previous stage in Core Strategy production (the Issues and Options Document) and it also meets the requirements of the new Regulation 25¹.

Consultation Involvement and Engagement

At the start of the consultation period, letters/emails were sent to everyone on the Development Plans database to notify them of the consultation opportunity. The letter (Appendix 19) included details of the events that had been organised, how to view the documents and how to submit comments on the documents. A second letter (Appendix 20) was sent during February 2009 to those on the database who had not yet sent in a response, encouraging people to contribute comments on the Preferred Draft Core Strategy.

Document Availability

The Preferred Draft Core Strategy and Sustainability Appraisal, together with a number of other background documents, could be viewed online via the Council's website and were available for inspection at the following locations:

- Planning Reception, Redditch Town Hall
- Redditch Library
- Mobile Library
- Woodrow Library
- Redditch One Stop Shops

Statutory Notice

A statutory notice of commencement for the consultation period was also put into The Standard Newspaper on 31st October 2008 (Appendix 21).

Press releases

Press releases were also prepared and sent to local newspapers for incorporation as a news items urging residents to "Have a say on plans" (Appendix 22).

Consultation Leaflet

Consultation leaflets (Appendix 23) were placed at popular and highly frequented locations around the Town Centre including:

- The Stranz Café
- The Palace Theatre
- Apollo Store
- Police Station

¹ The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2009

- Information Desk within the Kingfisher Centre
- Esquires café within the Kingfisher centre
- Coffee Lounge within the Kingfisher centre
- Marks and Spencer
- Debenhams Staff Room

Leaflets were also placed on all Council notice boards during the consultation period.

Displays

A display for the Preferred Draft Core Strategy was set up at Planning Reception at the Town Hall. The display provided a snap shot of the Preferred Draft Core Strategy and leaflets and documents were available for people to take away.

Redditch Matters Magazine

During the consultation period for the Preferred Draft Core Strategy, Redditch Matters was re-launched. This is a Council produced magazine which is delivered to each house within the Borough. The Preferred Draft Core Strategy was a big feature in the magazine (taking the centre pages) and a consultation response form was also included as an insert.

Cinema Advertisement

A 30 second advertisement was prepared which summarised and detailed the key points of the Preferred Draft Core Strategy. The advert consisted of three slides (see Appendix 24) and was shown at Redditch Cinema before every film throughout the consultation period.

Core Brief & Email to All Council Staff

A news item inviting staff to have their say on the Preferred Draft Core Strategy was placed on the Council Core Brief and was sent to all Redditch Borough Council employees on 21st January 2009 (See Appendix 25).

An email to all Council staff (Appendix 26) was also circulated on 1st April 2009 encouraging staff to look at the consultation documents and submit their opinions/views.

Email Signatures

All staff within the Development Plans team attached the following signature to the bottom of their outgoing emails to advertise the consultation period:

“Redditch Borough Council is undertaking public participation on its Preferred Draft Core Strategy. Please see www.redditch.whub.org.uk for more information.”

Call – A – Planner

The Development Plans team also made themselves available to members of the public every Tuesday from the 13th January – 5th May 2009 10am - 4pm. People could call or visit the Town Hall and be guaranteed to be able to talk with a planner about the Preferred Draft Core Strategy during these times.

Neighbourhood Groups

Information packs (Appendix 27) consisting of a leaflet and map showing proposed growth locations were given out to residents at neighbourhood groups. These packs along with a verbal update were presented at all Neighbourhood Groups. Planners attended Neighbourhood groups at Winyates, Webheath and Matchborough to provide residents with the opportunity to ask any questions.

Drop-in Sessions

A series of drop-in sessions were held (Appendix 28), where people were invited to discuss the proposals contained within the Preferred Draft Core Strategy:

Date	Location
Tuesday 4 th November 2008	Sainsbury's
Saturday 8 th November 2008	Kingfisher Shopping Centre
Thursday 13 th November 2008	Morrisons
Friday 21 st November 2008	Arrow Valley Countryside Centre
Saturday 29 th November 2008	Redditch Library
Thursday 4 th December 2008	Redditch Town Hall

Two joint drop-in sessions were also held with Bromsgrove District Council to allow people to discuss cross-boundary growth issues as well as both of the Council's emerging plans.

Date	Location
Tuesday 6 th January 2009	Town Hall Redditch
Thursday 8 th January 2009	Council House, Bromsgrove

Summary of main issues and how these have been addressed

In total 199 representations were received on the Preferred Draft Core Strategy. Each representation was logged by Development Plans and allocated to an Officer who assessed the representation and considered whether an action was required. If an action was required this either involved a change in policy, further consultation with the individual/company who submitted the representation or passing the representation to a more appropriate department if the representation is not related to planning. The representations were divided into the following sections:

- a) Analysis of Green Belt and Areas of Development Restraint
- b) Attractive Facilities
- c) Balance between housing and employment
- d) Climate change and sustainability
- e) Cross Boundary
- f) Delivery Strategy
- g) Design and Safety
- h) Development Strategy
- i) Enterprise and Skills
- j) Historic Environment
- k) Infrastructure
- l) Landscape, open space, nature, pollution, Green Belt
- m) Miscellaneous
- n) Open Space Needs Assessment
- o) Policy SP.3
- p) Procedural
- q) Retail
- r) Strategic Housing Land Availability Assessment
- s) Sustainability Appraisal
- t) Sustainable Developments Strategy
- u) Sustainable Transport
- v) Vision and Objectives
- w) Waste
- x) Water and Flooding
- y) Winyates Green Triangle

Appendix 29 contains a table including a summary of the responses received, an Officer response to the comments and a related recommended action where a change was identified.

Perhaps the most pertinent key issue raised by respondents is how the Borough Council would have preferred to deal with its development requirements cross boundary. At the time of drafting the Preferred Draft Core Strategy, the Borough Council had evidence in the form of the White Young Green Second Stage Report on the growth implications of Redditch and pursued its conclusions as the Borough Council's preferred approach. The conclusions of this jointly commissioned study also formed the basis of the evidence the Borough Council used in support of its argument to the West Midlands Regional Spatial Strategy Panel of

Inspectors that the development requirements should be in the region of 2,400 dwellings within the Borough boundary.

Objections were received which disagreed with the findings of the White Young Green Study and therefore the Borough Council's approach. Objectors also noted that the Borough Council would not be meeting the development requirements which were set by the then Preferred Option Regional Spatial Strategy. There were also many respondents, mostly residents of nearby Areas of Development Restraint, who supported the specific Bordesley Park allocation in Bromsgrove District in preference to development of the Area of Development Restraint.

Due to the on-going discussion between Redditch Borough Council and Bromsgrove District Council, the Officers response to these objections and support refers to the need for the joint consultation which is due to end on 22nd March 2010, which will give information on which option or combination of options across the boundary would be more preferable for both Councils. Similarly comments were received on the Area of Development Restraint within Redditch, where residents mostly opposed their use, and developers of the sites indicated that the sites should be developed.

There are a number of suggested changes to the Vision and Objectives in the Core Strategy as a consequence of comments received. All comments on the Vision and Objectives were received from Stakeholders who requested greater clarity.

Climate change matters received many comments, mostly questioning the approach the Borough Council have taken, which was to reiterate the related targets that were set out in the West Midlands Regional Spatial Strategy Preferred Option Document. It is not incumbent upon a Core Strategy to simply repeat provisions set out in either National or Regional policy, therefore Officers suggested that this policy is reviewed. Changes to the West Midlands Regional Spatial Strategy policy were detailed in the Panel Report (September 2009) therefore Officers will need to compile further technical evidence in support of a revised policy.

Comments were received on the Preferred Draft Core Strategy Flood Risk and Water Management Policy seeking additions and amendments. Officer's response to these comments refers to recent advice given at a Planning Inspectorate Frontloading Meeting (8/2/2010) from the Planning Inspectorate, who advised that the flooding experienced in Redditch is not a significant issue. If the policies in the Core Strategy are not focussed on locally distinctive issues then the need for the policies is questioned. In addition, the policy as presented in the Preferred Draft Core Strategy reiterated national planning policy in PPS25. Officers suggest that this policy is deleted, and that following this advice from the Planning Inspectorate, that all policies are reviewed to determine where there may be unnecessary repetition.

The way in which the Borough Council projected to develop i.e. the development strategy, received some comments. There were comments questioning the use of windfall sites to contribute towards the development targets. In discussion with the SHLAA Working Partnership it is recommended that a windfall allowance should be excluded from the first 10

years of the Plan to ensure robustness and conformity with PPS3 and this will be reflected in the April 2010 Strategic Housing Land Availability Assessment refresh. Officers also recommend that the approach to windfalls be drafted into the policy. Another comment on the development strategy requested allowance for the timely release of land for affordable housing development to come forward in Green Belt locations. Officers suggest that the level of development likely to be required on land currently designated as Green Belt will need to be phased sooner in the plan period to enable development to continue to come forward in a satisfactory manner without compromise to development in Redditch's urban area. This should be addressed through a revision to Policy SP.2.

With regards to affordable housing, objections were received to the 40% affordable housing requirement for residential development on the basis that it was too high, making developments unviable and endangering the ability of the Council to deliver regional targets, particularly relevant in the current economic climate. Officer's response to this is that the provision of 40% affordable housing requirement has been established through the findings of the 'Strategic Housing Market Assessment for the South Housing Market Area of the West Midlands Region' (April 2007). Officers recommend that further investigation of the viability of alternative affordable housing provision is undertaken including a sliding scale of financial contributions and lower levels of on-site provision should a threshold of 40% prove too constraining. A refresh to the Housing Needs Assessment can be commissioned shortly to evidence this further.

Comments have been received questioning how the Town Centre requirements can be accommodated – i.e. retail and office as set out in the West Midlands Regional Spatial Strategy. The Office Needs Assessment proposes a revised office requirement of 30,000 sq.m, of which the Town Centre can accommodate 22,000 sq.m consequently Officers suggest that policy will need to reflect the findings of this study.

Land to the Rear of the Alexandra Hospital received some comments generally either in support of its use and some objecting to its use. In order to be compliant with the West Midlands Regional Spatial Strategy a maximum of 5000sq.m of B1 use can be provided at this location, also in light of higher housing targets in the West Midlands Regional Spatial Strategy Panel Report (Sep 2009) Officers suggest a change to this policy to reconsider this Strategic Site for mixed use development of employment and residential.

The Government Office for the West Midlands in its response to the Preferred Draft Core Strategy, noted concerns regarding the style and presentation of the individual policies and the overall content of the Core Strategy. In order to respond to these criticisms Officers revised the suggested layout to the Core Strategy and presented a re-drafted version in July 2009. The changes to the layout were significant, including removing the Local Area Agreement Themes as the chapters to the policies. Officers grouped what was aiming to be achieved into a number of suggested Key Strategy Areas including:

- 1) Green Strategy
- 2) Design and Safety
- 3) Development Strategy

- 4) Sustainable Settlements
- 5) Cross Boundary
- 6) Balance between Housing and Employment
- 7) Enterprise and Skills
- 8) Retail and Town Centre
- 9) Historic Environment
- 10) Attractive Facilities
- 11) Infrastructure

Government Office for the West Midlands indicated that the proposed revised layout satisfied the general requirements of the Core Strategy, and that work needed to continue to ensure that the content of the Core Strategy meets the requirements of PPS12 Local Spatial Planning. Officers will continue to liaise with Government Office for the West Midlands on this matter.

Other minor changes to wording of policies presented in the Preferred Draft Core Strategy were suggested for a number of other policies, all of which are detailed in Appendix A.

In addition to responses to the actual Preferred Draft Core Strategy, the Borough Council received a number of comments to the Strategic Housing Land Availability Assessment 2009. Mostly these comments were objections to the inclusion of specific sites; however some comments from developers focussed upon the methodology used as part of the assessment. Since the consultation period, Officers have addressed these concerns and have established a Strategic Housing Land Availability Assessment working partnership to further improve the content of the Strategic Housing Land Availability Assessment, whose members include industry experts and developers.

Overall the responses received have assisted in the development of the Core Strategy, and therefore the process of consultation in respect of the Preferred Draft Core Strategy was considered a successful process.

Development Options Joint Consultation (Feb-March 2010)

From 8th February 2010 to 22nd March 2010 a special consultation was held jointly between Bromsgrove District and Redditch Borough Councils on the options for Redditch cross boundary growth, based on the requirements in the West Midlands Regional Spatial Strategy Phase Two Panel Report. Although this joint consultation officially ran between 8th February and 22nd March 2010, this was extended until 30th April to allow some consultees further time to submit representations.

Consultation Involvement and Engagement

At the start of the consultation period, letters/emails were sent to everyone on both Councils databases to notify them of the consultation opportunity. The letter/email included details of the events that had been organised, how to view the documents and how to submit comments on the documents. A copy of the letter can be found in Appendix 30.

Consultation Leaflet

A consultation leaflet was jointly produced by both Councils (Appendix 31), and included details on the development targets for Redditch Borough and options for accommodating the required development. Three broad options for Redditch growth within Bromsgrove District were presented on a map. A response form was provided alongside the leaflet (Appendix 32).

Document Availability

The leaflets, together with a number of other background documents including a Revised Development Strategy for Redditch (on Redditch's website only), could be viewed online via both Council's websites and were available for inspection at the following locations:

- Planning Reception, Redditch Town Hall
- Redditch One Stop Shops (Batchley, Winyates and Woodrow)
- Redditch Library
- Woodrow Library
- Redditch Mobile Library
- Bromsgrove Library
- Alvechurch Library
- Catshill Library
- Hagley Library
- Rubery Library
- Wythall Library
- Bromsgrove Customer Service Centre

Newspaper Advert

Adverts were placed in local newspapers in both Redditch and Bromsgrove to raise awareness of the consultation and encourage residents to write in their views on the options put forward (Appendix 33).

Press Release

Press releases were also prepared and sent to local newspapers for incorporation as news items “to invite people to have their say on where new development should be located in and around the Borough over the next 16 years” (Appendix 34).

Council Core Brief

A news item inviting staff to have their say on the Preferred Draft Core Strategy was placed on the Council Core Brief and was sent to all Redditch Borough Council employees during the consultation period (Appendix 35)

Drop-in Sessions

A series of drop-in sessions were held in locations across Redditch and Bromsgrove, where people were invited to discuss the proposals with Officers from both Councils.

Date	Time	Location
11 th February	2-9 pm	Town Hall Redditch
13 th February	9 am-5 pm	Kingfisher Centre
24 th February	6.30 pm onwards	Palace Theatre
2 nd March	9 am-9 pm	Alvechurch Baptist Church
17 th March	5-9 pm	Bentley Village Hall

Community Forums and Neighbourhood Groups

Presentations on the options for Redditch cross boundary growth were made to Redditch and Bromsgrove Community Forum’s, Alvechurch Parish Council as well as Neighbourhood Groups in Redditch.

Summary of main issues and how these have been addressed

In total 322 representations were received on the Development Options Joint Consultation. Views were expressed by many different groups, developers, businesses and individuals who either live or work in Bromsgrove or Redditch or have an interest in the area. Appendix 36 contains a table including a summary of the responses received, a joint Officer response to the comments and a proposed action.

The following paragraphs set out the key issues raised during the consultation period and how they have been addressed by officers of both authorities.

Alternative development locations: alternative options for the location of new development were suggested which included Studley, Beoley, Astwood Bank, Feckenham or east into Stratford-on-Avon District and the alternative option of a combination of the proposed cross-boundary strategic locations. In terms of the alternative options that were presented, Officers have established the specific reasons why these locations are not suitable for further development: these explanations can be seen in the Redditch background document to the consultation the 'Revised Development Strategy for the Emerging Core Strategy Consultation Paper' and the Sustainability Appraisal Refresh.

Biodiversity: concerns that new development would lead to the loss of wildlife and habitats. Officers state that an analysis of available ecological information would be carried out which will identify any constraints to development. A number of the sites that have specific environmental issues will also require an ecological assessment at the Planning Application stage.

Flooding: many respondents had concerns that new development would make flooding worse and that no mitigation measures would be put in place. Respondents also considered that if an area was likely to flood then this would prevent any development being located there. Officers advise that a Strategic Flood Risk Assessment (SFRA) Level 1 had been completed and that a Level 2 SFRA was being completed. This study will consider the flood risk posed to development sites and detail the mitigation measures necessary. Officers also stated that flooding issues are an important consideration but may not necessarily prohibit development.

Funding: many respondents misunderstood the funding procedures of new development and many believed that the Council would pay for all future development. It is clarified by Officers that the cost of development would be borne by the developer and this also applies to the infrastructure that is required to enable the development to proceed.

Green Belt: concerns over the loss of the Green Belt for two reasons: it would be a loss of buffer between both Redditch and Bromsgrove and Redditch and Birmingham, and there would be an increased risk of coalescence of both Redditch and Mappleborough Green and Redditch and Bordesley. The Officer response states that the delivery of cross-boundary growth is uncertain given the revocation of the RSS and therefore further consultation will be conducted on the level of development appropriate for the Borough and District and the

strategic locations for this. Officers also note that Bordesley is not a defined settlement and therefore coalescence of settlements in this location is not a relevant consideration.

Housing requirement: questions regarding the amount of dwellings that had been allocated to Redditch Borough as a development target up to 2026. Many respondents stated that 7000 dwellings was too high. A number of respondents particularly questioned whether this target was appropriate when considering the implications of the recession and the economic downturn. Officers state that the housing figures were set by the West Midlands Regional Spatial Strategy and the target for Redditch was based on projected need and takes account of past trends and population projections. Officers also note that the plan period runs up to 2026, therefore this takes into account peaks and troughs in the market. Officers state that the Councils would be undertaking further work to assess relevant factors/constraints before determining which site or sites should be developed. Officers advise that in light of the revocation of the RSS further consultation will be conducted on the level of development appropriate for the Borough and District and the strategic locations for this. As stated previously, the WMRSS has now been reinstated as part of the statutory development plan. However, the government has also signalled its intention to radically reform the planning system and introduce new national planning policy through the forthcoming Decentralisation and Localism Bill, which is likely to require further consultation on the appropriate level of development for the Borough.

Infrastructure: concerns whether infrastructure would be provided alongside any new housing development. Respondents made it clear that, amongst other things, employment and community facilities would be necessary. Officers provide the response that all necessary infrastructure would need to be in place to enable development, and an Infrastructure Delivery Plan was being progressed by both Authorities.

Lack of employment opportunities: concerns were raised about the lack of employment opportunities in the town and that people may commute into Birmingham for work. Officers state that it is necessary to have employment land targets to ensure a balance between housing and employment. The employment targets allocated to Redditch were set by the West Midlands Regional Spatial Strategy and based on the projected need; however these may be revised in light of the revocation of the RSS. There is a need to identify land for a variety of employment uses. Officers also state that it is intended that new development will comprise sustainable mixed use communities enabling people to live and work locally rather than commuting to Birmingham.

Re-use of empty properties: comments received during consultation recommended that empty properties are used and vacant land should be utilised for housing and employment ahead of the use of ADR land or Green Belt land. Officers state that the Evidence Base studies that have been conducted ensure that all potential sites for development in Redditch Borough have been identified.

Strategic development locations: Many of the objections received in relation to strategic locations were unsubstantiated; however those arguments which are duly made are being investigated further.

A435 ADR: possibility of conflict between industrial and residential uses wildlife/protected species; flood risk; infrastructure upgrades for water supply and waste water; remote from town centre; not well integrated with existing residential neighbourhoods; lacks the scale to create balanced local communities; coalescence with Mappleborough Green and; development may lead to traffic problems on the A435.

Brockhill ADR/ Brockhill Green Belt and Land west of A441: potential presence of mineral deposits; may be potential for designation as SSSI; lack of existing amenities; flooding; adverse traffic implications; adverse impact on biodiversity/wildlife; adverse impact on Brockhill Woods; infrastructure upgrade required for water supply and waste water; topography; reduction of Green Belt buffer between Redditch and Birmingham and; encouraging migration from Birmingham.

Webheath ADR: the implications of development on the local road network; the lack of local services; the lack of local employment opportunities; the need to pump sewerage due to topography; flooding issues surrounding the site and; concern over the implications of development on wildlife located on the site. Respondents also requested that the findings of the White Young Green Report, which recommended that the three ADRs should be changed to Green Belt, be implemented.

Foxlydiate Green Belt and Area Adjacent to A448: the Green Belt; coalescence with other settlements; unnatural expansion of town; topography; sewerage issues requiring pumping "over the ridge"; adverse impact on setting of Hewell Historic Park; western half of the area is classified as being of moderate importance for biodiversity and the eastern part is low to moderate; further away than other options from town centre, employment opportunities, railway station and other amenities; major infrastructure improvements would be required to transport system; poorly served by public transport; Foxlydiate Wood Local Nature Reserve, Foxlydiate and Pitcheroak Woods Special Wildlife Site, Hewell Park Lake SSSI; loss of working farms; poor potential for integration with the town; greater likely dependence on car borne travel; no defensible green belt boundary and; could encourage ribbon development along A448.

Land East of A441: inadequate infrastructure; reduction of Green Belt buffer between Redditch and Birmingham; encourage in-migration from Birmingham; traffic congestion; flooding; topography; adverse impact on small villages and communities including coalescence with Bordesley; adverse impact on biodiversity/wildlife and; loss of amenity space.

Ravensbank ADR: main concern is with the Special Wildlife Site in this area.

Winyates Green Triangle: although the Winyates Green Triangle site was not presented as part of this consultation, Stratford on Avon District Council were consulting on their Draft Core Strategy at the same time, which did include the site. A small number of representations were submitted to RBC regarding this site during the consultation period. These representations were copied to Stratford on Avon District Council Officers for their consideration but those that were received by RBC have been summarised at the end of

Appendix 36 for information. Since Winyates Green Triangle was identified for potential development, a Transport Assessment and Ecological Assessment have been carried out which indicate that the cost of providing access and the ecological constraints on the site are likely to mean the delivery of development on the site is unviable.

With respect to the strategic development locations identified above, many representations received on the options for cross-boundary development and some development sites within Redditch (including some ADR land) made objections to the option that was located closest to the respondent: the respondent generally supported the option that was located furthest away. Officers state that a decision on development locations will be based on technical evidence and justified arguments presented through the consultation period.

Topography: concerns that building in an area with steep topography would increase flooding; they were also concerned that areas with steep topography would increase the visibility of the development. Officers respond by stating that topography would be carefully considered together with other factors but may not necessarily prohibit development.

Non-Planning considerations: Many of the issues raised during the consultation period are non-planning considerations and could not be controlled by the policies within a Core Strategy. These issues included; property values, covenants, compensation during construction, council tax, the timing of the consultations and the responsibility of the provision of council services.

In light of the revocation of RSS and emerging changes to the national planning system, the context for cross-boundary development had changed at this stage and this is reflected in the Revised Preferred Draft Core Strategy for Redditch and the Bromsgrove Draft Core Strategy 2.

Revised Preferred Draft Core Strategy (January-March 2011)

The consultation period for the Revised Preferred Draft Core Strategy began on 21st January and ended on 31st March 2011. The Revised Preferred Draft Core Strategy included revised policies following consultation on the Preferred Draft Core Strategy.

Consultation Involvement and Engagement

At the start of the consultation period, letters/emails were sent to everyone on the Development Plans database to notify them of the consultation opportunity. The letter/email included details of the events that had been organised, how to view the documents and how to submit comments on the documents. A copy of the letter can be found in Appendix 37.

Document Availability

The Revised Preferred Draft Core Strategy, questionnaire and Sustainability Appraisal, together with a number of other background documents, could be viewed online via the Council's website and were available for inspection at the following locations:

- Planning Reception, Redditch Town Hall
- Redditch Library
- Mobile Library
- Woodrow Library
- Redditch One Stop Shops

Consultation Questionnaire

The consultation questionnaire (Appendix 38) asked a number of questions relating to the draft Core Strategy. It asked for views on the Vision, Objectives, housing numbers, densities, the New Homes Bonus, Strategic Sites, employment targets and what people thought about extending the Town Centre boundary. In response to the Localism Bill, the questionnaire also asked what people considered as their neighbourhood (e.g. Ward, District, Town) and the best method for encouraging community groups to become more involved in local decision making.

Posters

Posters were placed on all Redditch Borough Council notice boards during the consultation period (a copy of the poster can be seen at Appendix 39).

Drop-in Sessions

A series of drop-in sessions were held, where people were invited to discuss the proposals contained within the Revised Preferred Draft Core Strategy:

Date		Location
Saturday 22 nd January	9am – 5pm	Kingfisher Shopping Centre
Monday 24 th January	7:15pm – 9:15pm	Webheath Village Hall (Public Meeting)
Tuesday 1 st February	8.30am – 1pm	Greenlands Business Centre
Thursday 10 th February	9am – 5pm	Redditch Town Hall
Wednesday 16 th February	5pm – 9pm	Redditch Town Hall

Displays

A display for the Revised Preferred Draft Core Strategy was set up at Planning Reception at the Town Hall. The display provided a snap shot of the Revised Preferred Draft Core Strategy and questionnaires were available for people to take away.

Council Website

A banner advertisement was prepared for the Council's website homepage (Appendix 40) which provided a direct link to the consultation page.

Press Releases

Press releases were also prepared and sent to local newspapers (Redditch Advertiser on 20th and 26th January 2011). These news items asked residents to drop-in to have their say on the future of Redditch and to have their say on how Redditch will look. The press releases also detailed the times and locations of the drop-in sessions (Appendix 41 and 42).

Summary of main issues and how these have been addressed

Over 300 responses were received by letter and email on the Revised Preferred Draft Core Strategy. Three petitions were also submitted in response to the consultation material. One relating to Brockhill with 674 signatures, a second petition on Webheath ADR with 1016 signatures and a third petition on the A435 ADR with 33 signatures. These petitions have been noted and taken into account and can be found in the table in Appendix 43. Appendix 43 contains a table including a summary of the responses received, an Officer response to the comments and a related recommended action where a change can be identified.

Each representation was logged by the Development Plans team and allocated to an Officer who assessed the representation and considered whether any action was required. If an action was required, this was either a change to policy, further consultation with the individual/organisation that submitted the representation or the representation was passed to another Council department if the representation was not related to planning.

The representations were summarised and divided into sections in the order in which the Plan is split, which loosely followed the order of the questions in the accompanying questionnaire. The summarised responses were responded to by Officers; this was subsequently endorsed by Members at the Council's Executive Committee and Full Council.

The responses had the benefit of being guided by a questionnaire; therefore it was considered a successful consultation period because it was possible to draw out views on a number of areas which had been refined following previous consultation. In particular, the vision and objectives received a lot of support.

An important consideration that continued to be raised through this consultation was how the Council proposed to deal with the Redditch cross boundary growth issue. Some respondents suggested that more information was needed on this matter otherwise the Plan as a whole was not able to show how it will deal with its requirements. In contrast, there were many respondents who continued to suggest that the Plan should not be dealing with the full requirements for housing, questioning the need for that housing.

At this time, following the Coalition Government's announcements for new Planning Policy in the form of the National Planning Policy Framework, there were many comments anticipating that, in the context of 'localism', it would be possible to overturn any requirement on the Council to plan for development on Green Belt land. The Council accepted that more up to date evidence base would be required in the form of an up to date Strategic Housing Market Assessment, which was subsequently commissioned.

As with previous consultations there were responses from residents near to the Areas of Development Restraint (ADR – designated under Local Plan No.3) in objection to the proposed development of those sites. There was also a lot of opposition to the proposed development of Brockhill West Strategic Site which is currently designated Green Belt land. There were also many respondents, mostly residents near to ADRs, who supported a specific allocation at Bordesley Park in Bromsgrove District in preference to development of

the ADRs. However, this would mean that the Borough would not meet as much of its housing need as possible in its own area, and of course, further implications for Green Belt land.

Comments received on the Sustainable Transport policy suggested a number of changes which would improve the policy by cross referencing other documents like the Worcestershire Local Transport Plan.

The Climate Change policy attracted some confusion with respondents questioning the approach the Borough Council was taking; in particular, whether the policy was trying to express a desire to exceed national standards. The officer responses made it clear that this was not the intention of the policy.

Representations suggested that the end date of the plan needed to be expanded to take into account the need for at least a 15 year time horizon. The Council accepted that this time horizon should be calculated from the date of adoption and that the plan period should therefore extend to 2030.

Also linked to the Coalition Government's changes to the planning system, it was suggested that the reference to back gardens as being Previously Developed Land should be removed. The Council agreed and changed this reference.

With regards to affordable housing, objections were received to the 40% affordable housing requirement for residential developments on the basis that it was too high, making developments unviable. Also comments suggested that the policy was too vague on its requirement. Officer's response to this was that the requirement should be re-tested through the SHMA and a viability assessment of the ability of development to make this contribution. This work was subsequently commissioned.

There were comments received about a lack of clarity in the plan about how employment land was being allocated and identified in the Plan. Officers agreed that an appendix of the employment land to be allocated would provide some of this detail.

Mainly in response to a specific question on this matter in the questionnaire, there was a lot of support for the removal of the Town Centre Peripheral Zone. The Council accepted this support and proposed the expansion of the Town Centre into the peripheral zone.

Overall, the responses received were very focussed because many of the respondents utilised the questionnaire supplied by the Council. The consultation responses also assisted the Council in understanding where changes in national planning policy may result in the need for more up to date evidence. Therefore the consultation in respect of the Revised Preferred Draft Core Strategy was considered a successful process.

Redditch Housing Growth Joint Consultation (April-May 2013)

Between 1st April and 15th May 2013, further consultation took place on Redditch Housing Growth alongside consultation on the Draft Borough of Redditch Local Plan No. 4. This was a joint consultation between Redditch Borough Council and Bromsgrove District Council which built on the Development Options Joint Consultation in 2010. Since then the two Councils have undertaken more detailed work to find preferred locations to accommodate Redditch's development needs in Bromsgrove District.

The Housing Growth Development Study was completed in-house by Officers from both Councils and identified the most sustainable growth location(s) with more detailed evidence. Two cross boundary sites were identified at Foxlydiate (Site 1) and Brockhill East (Site 2).

Consultation Involvement and Engagement

At the start of the consultation period, letters/emails were sent to everyone on both Councils databases to notify them of the consultation opportunity. The letter/email included details of the events that had been organised, how to view the documents and how to submit comments on the documents. A copy of the letter can be found in Appendix 44.

A dedicated new email address consultplanning@bromsgroveandredditch.gov.uk and website www.bromsgroveandredditchplanning.co.uk were set up for the purpose of this consultation. The website listed upcoming consultation events, had links to all of the consultation documents, evidence base documents and answered Frequently Asked Questions.

Responses were invited via an online response portal or a printed response form (Appendix 45). Responses could be made to either Council and a dedicated administration officer coordinated the collation of both paper and online responses.

Document Availability

The Housing Growth Development Study together with an Executive Summary, Non-technical Summary, Sustainability Appraisal and consultation leaflets, were available for inspection at the following locations:

- Planning Reception, Redditch Town Hall
- Redditch One Stop Shops (Batchley, Winyates and Woodrow)
- Redditch Library
- Woodrow Library
- Redditch Mobile Library
- Bromsgrove Library
- Alvechurch Library
- Catshill Library
- Hagley Library
- Rubery Library
- Wythall Library
- Bromsgrove Customer Service Centre

Consultation Leaflet

The Housing Growth Consultation Leaflet (Appendix 46) presented the two Council's preferred option for growth, adjacent to Redditch Borough but within Bromsgrove District, to meet the objectively assessed development needs of Redditch up to 2030.

The leaflet explained why cross boundary development was being considered, what consultation had been undertaken previously and where the preferred locations for development were. The leaflet also included a map of the two preferred development areas, a draft Housing Growth Policy, and details of how to respond to the consultation and where to find additional information.

The leaflet asked three main questions:

- *Do you agree with the chosen areas for new development?*
- *Do you agree with the Policy produced to deliver these developments?*
- *If you don't agree with the areas or the policy what alternatives can you suggest?*

Posters

A4 Posters were placed on all Redditch Council notice boards during the consultation period (a copy of the poster can be seen at Appendix 47). Large A0 Posters advertising the consultation event at the Kingfisher Shopping Centre were put in wall mounted display panels around in the Shopping Centre (Appendix 48)

Displays

A display was set up at Planning Reception at the Town Hall alongside the Local Plan No.4 display (see Appendix 49). Pop-up displays (Appendix 50) were also located at the Abbey Stadium and Dolphin Leisure Centres when not in use at one of the drop-in sessions.

A Power Point Display was shown continuously at the Redditch Town Hall One Stop Shop and Bromsgrove Dolphin Centre advertising the consultation opportunity (Appendix 51).

Drop-in Events

A series of Drop-in events were held, where people were invited to discuss the cross boundary growth proposals contained within the Consultation leaflet. Officers from both Councils were at the events to talk people through the preferred growth options and the supporting evidence, and to answer questions. These Drop-in events were held in various locations, on a range of days and at different times to ensure people could attend. Details of the exhibitions are listed in the table below:

Date	Time	Location
Monday 8 th April 2013	2-7 pm	Bentley Village Hall
Wednesday 10 th April 2013	10am-8 pm	Foxlydiate Arms Public House
Friday 19 th April 2013	10am-5 pm	Kingfisher Shopping Centre
Saturday 20 th April 2013	10am-5 pm	Kingfisher Shopping Centre
Thursday 25 th April 2013	10am-8 pm	Foxlydiate Arms Public House
Monday 29 th April 2013	2-8pm	Alvechurch Village Hall

Officers from Worcestershire County Council Transport Department also attended some exhibitions to provide advice relating to road infrastructure (one of the key concerns).

Newspaper Advert

An Advert was placed in Bromsgrove and Redditch Standard newspapers in April (2013) (Appendix 52).

Website

A website was created which contained all of the information and documents to support the Redditch Growth Consultation (Appendix 53).

Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP)

A presentation was taken to the GBSLEP informing members of the consultation opportunity (Appendix 54).

Summary of main issues and how these have been addressed

In total, 456 representations were received on the Cross Boundary Growth issue. Views were expressed by many different groups, developers, businesses and individuals who either live or work in Bromsgrove or Redditch or have an interest in the area. The Key Issues which arose from the representations were logged jointly and Officers from both Councils jointly responded to the Key Issues and gave consideration as to whether further actions were required. On completion, the response tables (Appendix 55) were agreed and signed off by Policy Managers from both Councils ready to be reported back through the Committee process.

The following paragraphs set out the key issues raised during the consultation period, how they were responded to and what changes were incorporated into the Redditch Cross Boundary Development Policy. Identical versions of this policy appear in both the Redditch Local Plan No.4 and the Bromsgrove District Plan.

Alternative locations for development: several alternative locations for development were suggested in preference to those identified. After further evaluation none of the alternatives were considered to provide a more suitable or sustainable option. Reasons for dismissal were reiterated and explained further where necessary and therefore no changes were made in relation to the choice of sites.

Biodiversity: respondents raised concerns of flora and fauna destruction and the impacts of development on numerous wildlife species, including protected species. This is an issue which would potentially affect any area identified to accommodate cross boundary growth. Before development could commence in any area, a habitats survey and protected species survey would need to be completed in accordance with relevant legislation. This would inform the master planning of a site in order to maximise opportunities for biodiversity and mitigate the effects of development. Furthermore, ecological assessments would need to be undertaken, including tree and hedgerow analysis and watercourse analysis. It was considered that the issue of biodiversity was sufficiently addressed within the draft policy. The policy highlighted the need for a strategy and management plan for green infrastructure whilst also maximising opportunities for biodiversity and therefore no changes to the policy were made in relation to this issue.

Democratic process: questions were raised as to the conduct of the Councils' democratic process. Elected members of the Council fulfil several distinct roles. They are elected to represent their constituents but they also act collectively as the Local Planning Authority (as well as Housing Authority and Licensing Authority). These are statutory functions, discharged by Councils within a statutory framework and Guidance. The Local Planning Authority Members' duty is to adopt policies following statutory procedures, being guided in the process by professional officers. All Councillors are bound to follow a code of conduct when making decisions. If members of the public believe that this has been breached in any way then they can make a complaint to the Monitoring Officer. The complaint must identify the nature of the alleged breach; detail when and where the alleged breach occurred and the councillor that is alleged to have committed the breach details can be found on the Councils website.

Evidence base: some concerns were raised about the credibility and appropriateness of various elements of the evidence base. These comments have been rebutted as part of the response to the consultation process; however the Pre-submission stage offers the opportunity to raise these issues again under the Soundness checks if grievance is still felt.

Flood risk: concerns of increased risks of flooding were raised for both of the preferred development options and alternative locations for development, but predominantly in relation to flooding within Area 1 (Foxlydiate), in particular, at Feckenham. It is not for any new development to rectify any existing flooding problems as long as it does not exacerbate them. A site specific flood risk assessment would be needed in accordance with the relevant legislation and included mitigation measures where necessary. Any application for development will be dealt with in consultation with the Environment Agency. However, the policy was expanded to make it clear that surface water run-off should not only be managed on and around the sites but also downstream of the sites using SuDS.

Green Belt: concerns of significant impact on the Green Belt. Representations were also concerned with the analysis of Green Belt boundary review, coalescence with neighbouring settlements and urban sprawl. Concerns were raised regarding Green Belt review in both the preferred development options and alternative locations for development, but predominantly in relation to Area 1 (Foxlydiate). Insufficient land supply in the Borough necessitates the need to use Green Belt land to meet development needs and to reassess existing boundaries. Any development around Redditch's urban area would result in Green Belt erosion. 20 different sites were considered around the periphery of Redditch. After detailed analysis it was considered that sites 1 and 2 were the most sustainable, could more successfully integrate into the built form of Redditch and cause least harm to the Green Belt. On that basis, no boundary changes were made to the identified sites.

Historic Environment: responses have highlighted various historic assets within several areas during the consultation period. All relevant historic assets have been identified from the Historic Environment Record and taken into consideration in the HGDS. Any development proposals would need to make reference to survey work on the historic environment and undertake archaeological assessment to the standards required by WCC.

Infrastructure – General: concerns ranged from areas not needing additional facilities to an under provision of GP surgeries, dentists, shops, pubs, sports and recreation facilities. Development on the scale proposed is likely to require new facilities such as those identified above. The draft version of the cross boundary policy already made reference to the provision of community infrastructure however this has now been expanded in the updated version of the policy. This states '*in preparing development proposals, provision should be made for any necessary infrastructure for the effective delivery of the site*'.

Infrastructure – Education: concerns that local schools are at full capacity. WCC as education authority has indicated that two new first schools are required to support the needs of the development up to 2030. The provision of new schools was already addressed within the policy and therefore no changes were made in this regard.

Infrastructure – Funding: questions were raised as to how infrastructure would be funded. Generally developers will fund the infrastructure and the Infrastructure Delivery Plan will identify the funding streams.

Infrastructure – Health: concerns were raised that existing GP and hospital facilities would not be able to cope with an increase in population; especially given the current plans to down-grade the Alexandra Hospital. Worcestershire Acute Hospitals NHS Trust was consulted on this proposal and is aware of the amount of development needed and population changes up to 2030. The Councils will continue to engage with the Trust and the Redditch and Bromsgrove Clinical Commissioning Group through the Infrastructure Delivery Plan process. As it is currently unclear where additional health provision is required no changes to the policy could be made.

Infrastructure – Utilities: concerns regarding the provision of utilities due to cost and remoteness of potential development locations. There has been no indication from infrastructure providers that there will be a problem servicing any site around Redditch. Furthermore utility providers have not made representations on specific sites. Consultation with the infrastructure providers is on-going to determine the infrastructure needed to support development. To reflect comments raised the policy was expanded to state *'in preparing development proposals, provision should be made for any necessary infrastructure for the effective delivery of the site'*.

Landscape: issues of landscape sensitivity and the impacts that development would have were raised. The medium/ high Landscape Character Assessment is similar across several areas subject to the Focussed Area Appraisal; therefore sensitive design would be required to mitigate the impact on the landscape. Whilst it is preferable for development to occur in areas of low sensitivity, all of the land around the periphery of Redditch is of medium or high sensitivity and therefore medium sensitivity areas are not an undue constraint that weighs for or against the choice of a particular area. To ensure that the landscape issues were addressed in more detail the following text was added to the policy: *"Both sites should be sensitively designed to integrate with the surrounding existing environment and landscape"*.

Level of development needed: questions were raised as to the level of housing provision identified and whether it was needed or constituted the right type of housing tenure. The SHMA and SHLAA were used to support the LA position. These are both considered to be robust and reliable and therefore no changes were made to the quantum of development proposed within the policy.

Planning/ consultation process: questions were raised as to the appropriateness of the methods undertaken to consult the public, whether the consultation period was sufficient, non-compliance under Duty to Cooperate etc. These comments have been addressed as part of the response to the consultation process; however the Pre-submission stage offers the opportunity to raise these issues again under the Soundness checks if grievance is still felt.

Sewage Treatment: issues relating to cost and sustainability of treating waste water were raised with respect to different locations which could accommodate development. Sewerage treatment is only one aspect of sustainability. Although it is of course likely that STW's preference for sites to be located where the costs to STW are lower, there are other considerations that lead to the selection of preferred sites. The policy has been expanded to emphasise that there will need to be sufficient capacity of the sewerage systems for both wastewater collection and treatment whilst also encouraging engagement with both Severn Trent and the Environment Agency.

Sustainability: issues were raised that some locations were more remote to existing local facilities, employment opportunities, retail and health facilities. The policy is attempting to create sustainable development with onsite provision of community and other facilities and good connectivity to the town centre, schools etc. Other issues relating to increased car journeys are not particular to one site only. It is acknowledged any growth in the population will increase car usage. The draft policy already required improvements to passenger transport to encourage modal shift and has now been expanded to highlight that all dwellings should be within 250m of a bus stop.

Sustainability Appraisal: some concerns were raised about the credibility of the SA. The scoring of the effects against SA objectives has employed a consistent approach across all sites, and therefore suggestions to amendments to individual scores for selective sites are

not appropriate. An SA has also been undertaken on the policy highlighting the overall positive impact against the SA objectives emphasising that the sites can be delivered in a sustainable manner.

Transportation – Public transport: concerns relating to inadequate public transport network. The policy already made provision for significant improvements to the passenger transport network but this has now been expanded further to emphasise that all dwellings should be within 250m of a bus stop.

Transportation – Road Infrastructure: concerns raised that existing network of country lanes would be inadequate to take an increase in traffic. This issue is not limited to one location as all sites are on the rural/urban fringe of Redditch. The development will require a new road network to accommodate the volumes of traffic envisaged. It is anticipated that the most convenient access points will take traffic directly onto the Strategic Highway Network. Other issues raised relate to existing congestion and traffic speeds etc. New development cannot pay to rectify existing deficiencies but should not exacerbate any problem. A Transport Assessment will be required as part of any planning application and will identify where improvements to the road network are required. The need for a Transport Assessment was already highlighted in the draft policy and therefore no changes have been made in this regard.

Draft Borough of Redditch Local Plan No.4 Consultation (April-May 2013)

Between 1st April and 15th May 2013 consultation also took place on the Draft Borough of Redditch Local Plan No. 4. The Draft Local Plan No.4 proposed a mixture of existing policies carried forward from the Revised Preferred Draft Core Strategy (January 2011) as well as some new policies. The end date was extended up until 2030 rather than the previous end date of 2026 because the adoption date of the Local Plan is later than envisaged and the Plan is required to have a shelf life of at least 15 years from adoption.

Consultation Involvement and Engagement

At the start of the consultation period, letters/emails were sent to everyone on the Council's database to notify them of the consultation opportunity. The letter/email included details of the consultation, how to view the documents and how to submit comments on the documents. A copy of the letter can be found in Appendix 56.

Document Availability

The Draft Borough of Redditch Local Plan No.4, Draft Policies Map and Inset Maps, together with any supporting documentation, were available for inspection during the consultation period at the following locations:

- Planning Reception, Redditch Town Hall
- Redditch Library
- Mobile Library
- Woodrow Library
- Redditch One Stop Shops

Additionally, all documents were placed on the Redditch Borough Council website.

Statutory Notice

A statutory notice was placed in the Redditch Standard in April 2013 (Appendix 57).

Posters

A4 Posters were placed on all Council notice boards during the consultation period (a copy of the poster can be seen at Appendix 58). At this point the opportunity was taken to add QR codes to each poster. This allowed people to be instantly directed to the Council's website via their smartphone.

Displays

A display for Local Plan No.4 was set up at Planning Reception at the Town Hall alongside the Cross Boundary Growth display (see Appendix 49).

A PowerPoint Display was shown continuously at the Redditch Town Hall One Stop Shop and Bromsgrove Dolphin Centre (Appendix 51).

Drop-in Events

A series of Drop-in events were held, during this consultation period. While these focussed on Cross Boundary Growth, people were also invited to discuss Draft Local Plan No.4 and

view the consultation documents. These Drop-in events were held in various locations, on a range of days and at different times to ensure people could attend. Details of the exhibitions are listed in the table below:

Date	Time	Location
Monday 8 th April 2013	2–7 pm	Bentley Village Hall
Wednesday 10 th April 2013	10 am-8 pm	Foxlydiate Arms Public House
Friday 19 th April 2013	10 am-5 pm	Kingfisher Shopping Centre
Saturday 20 th April 2013	10 am-5 pm	Kingfisher Shopping Centre
Thursday 25 th April 2013	10 am-8 pm	Foxlydiate Arms Public House
Monday 29 th April 2013	2-8 pm	Alvechurch Village Hall

Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP)

A presentation was taken to the GBSLEP informing members of the consultation opportunity (Appendix 54).

Summary of main issues and how these have been addressed

In total 328 representations were received on the Draft Borough of Redditch Local Plan No.4. A summary table of the key issues and Officer responses can be found in Appendix 59.

Each representation was logged by the Development Plans team and allocated to an Officer who assessed the representation and considered whether any action was required. If an action was required, this was either a change to policy, further consultation with the individual/organisation that submitted the representation or the representation was passed to another Council department if the representation was not related to planning.

The representations were presented as Key Issues and in order of policy as listed in the Draft Borough of Redditch Local Plan No.4.

Consultation on the Draft Borough of Redditch Local Plan No.4 took place at the same time as the Redditch Housing Growth Consultation. The issue of cross boundary growth in Bromsgrove was not therefore considered in any detail in the representations on Local Plan No.4 because they were considered in relation to the housing growth consultation.

In terms of housing and employment requirements, a few comments were received about making more provision than the evidence base suggests. The Council response however is that sufficient land is allocated to meet the Borough's objectively assessed needs.

As with consultation on previous versions of the Plan there continued to be comments about localism and that it was unnecessary to deliver all of Redditch's housing needs. There were also many comments referring to 'political statements' (not provided) that Green Belt designation takes precedence over any duty to cooperate, or duty to meet objectively assessed needs. The Council did not change its approach to meeting its needs in accordance with national planning guidance.

Many responses were received in objection to development at the larger strategic sites, namely Webheath and Brockhill East. There were also many representations received supporting the decision to remove the Brockhill West Strategic Site as a site with development potential, based upon the objection from English Heritage. There were, however, no responses which suggested that the proposed strategic sites are not deliverable or sustainable, with the exception of Brockhill West, where the views of English Heritage about development here remain the same.

There were a number of comments about the duty to cooperate with the South Worcestershire Authorities confirming that there are no issues with Redditch that requires cooperation. Other respondents wanted the issue of Birmingham growth to be covered. The Council response to this was to point out that text on Birmingham growth is already included should there need to be any collaborative work on plan making in the future. The wording is similar to that used in other local plans which Birmingham City Council has agreed with individual authorities. However, as this matter has progressed over time, this text has been updated to refer specifically to the evidence base being collated to identify Birmingham's growth requirements and any cross boundary implications.

Many objections were received to the inclusion of various sites which are identified in the SHLAA as being appropriate for residential development. However, with the exception of one site, which was no longer available for development, all are being supported by the landowner and would constitute sustainable development subject to necessary infrastructure

being delivered. In addition, some alternative or additional locations for development were suggested. Some of these were vague and some more specific, and the SHLAA was either updated to investigate the suggested sites, or the Council dismissed the sites as being unavailable or unsustainable for development.

On the matter of the density of residential development, there was some opposition to the principle of having a set density requirement in different locations across the Borough. Respondents considered the effect of this would be to stifle development of certain types of properties i.e. larger properties or bungalows. The Council's response stated that although the policy is flexible enough to allow for different densities outside the range where it can be justified, the policy was amended to include a reference to support being given to lower density schemes where housing needs can be met.

Appendix 4 (IDP Summary Table) of the Draft Borough of Redditch Local Plan No.4 received some comments about inclusion of more delivery partners and about changing some of the monitoring indicators. The table has, however, been updated to reflect more accurate information about infrastructure received during the consultation period and has been refocused to consider the infrastructure implications of Local Plan No.4 policies.

Overall, the responses received were generally site specific, and very few significant changes to policy or approach was taken by the Council as a result of this consultation. This is likely to be because the number of previous consultations undertaken has allowed for refinement of the policy content over time. This consultation has, however, greatly assisted the Council in understanding the infrastructure requirements related to the Local Plan because the quantum and location of development and how it relates to Redditch Borough was published, enabling stakeholders to provide more detailed responses than previously submitted.

Summary of Statement of Consultation

For each stage of consultation, this statement outlines which bodies and persons were invited to make representations on the preparation of the Plan, how these bodies and persons were invited to make representations, a summary of the main issues raised by those representations, and how these main issues have been addressed in the Plan.

This Statement of Consultation also demonstrates that all of the requirements set out within the Councils' Statement of Community Involvement have been met at each stage of the process. With regard to legal conformity, the Statement demonstrates compliance with the Town and County Planning Regulations. In particular this Statement demonstrates that at each consultation opportunity the appropriate documents have been available for inspection and the appropriate advertisement and notifications have been completed.

This Statement demonstrates that those bodies and stakeholders responsible for the delivery of the Local Plan have been consulted and fully engaged with the process from the outset. This is evidenced through the notification letters sent out at the beginning of each consultation period. However, key stakeholders have been involved on an on-going basis through continuous liaison with Officers throughout the preparation of the Plan.

Due to the volume of the Appendices for this document, they can only be viewed online at www.redditchbc.gov.uk/localplan