REDDITCH

LOCAL PLAN No.4

CONSULTATION

OBJECTIONS

MAY 2013

MR & MRS A.J.WARBY
26 Crumpfields Lane
Webheath
Redditch
Worcs
B97 5PN

THIS DOCUMENT IS AN OFFICAL OBJECTION IN ITS ENTIRETY, AND AS SUCH IS NOT TO BE SUMMARISED, CONDENSED OR EDITED IN ANY WAY

Introduction

This document forms my official objection to the Redditch Local Plan No.4 consultation exercise.

The format used throughout this document is as indicated below:

Subheadings in **bold** *reference the aspect of the document being questioned or objected to, and the text below this includes the reasons why, together with supporting evidence.*

*Extracts from the original document are shown in '*standard text'*, with my comments/objections in italic.*

Any text in ***red*** *highlights key issues with Local Plan No.4 evidence or policies.*

Please note that this document in its entirety forms my objection to the Local Plan No.4 Consultation, and as such should not be summarised, edited or condensed in any way. I expect the document to be available in full for the Inspectorate stage of this process.

Local Plan No. 4 Introduction

States 'The most important influence on the Local Plan is what local communities, stakeholders and developers have to say on what the strategy is aiming to achieve. The Local Plan needs the support of the community, and aims to help local people recognise that new development can benefit their communities by creating wider sustainable communities, and that new housing and economic growth can revitalise areas'.

If these are indeed the most important influences on the Local Plan, then will Redditch Borough Council be modifying its policies to remove Webheath ADR, along with the cross boundary site at Foxlydiate from the plan, in line with the views of more than a thousand residents from the local community who are objecting to its proposals, who feel that their community is already sustainable, and does not require revitalisation?

Delivery and Infrastructure

'Redditch Borough Council has been undertaking discussions with key stakeholders and also those with responsibilities to deliver infrastructure. This ensures that the options taken forward to resolve Redditch's local challenges are actually deliverable. Local Plan No.4 is underpinned by evidence to demonstrate that there is a realistic prospect of the Plan being delivered.

This is not true. The deliverability of infrastructure is key, especially to the larger sites, yet there is support from Severn Trent for example, indicating that alternative sites to those at Webheath and Foxlydiate are preferable for providing sustainable and viable infrastructure (Overview of Potential Sewerage and Sewerage Treatment Impacts from Strategic Development Proposals for Redditch, STW December 2012).

The development at Foxlydiate is reliant on major road infrastructure improvements to provide access to the site, and also to mitigate issues that will arise locally as a result of this development. There is no evidence of a master plan being provided for this site, or its potential access on to the A448, so can there be a realistic prospect that this will all be deliverable for this site? However, developers for the 'omitted' site at Bordesley Park have committed to the construction of a Bordesley Bypass, demonstrating again that alternative sites have more evidenced and realistic prospects of being delivered.

In addition, RBC has acknowledged that not all the landowner questionnaires sent out as part of the planning process were returned, and that there are some land ownership issues with both the proposed strategic areas at Foxlydiate and the Webheath ADR. Does this really demonstrate a commitment to ensure deliverability, especially when alternative sites do not have the same potential problems ?

Policy 3 – Development Strategy

*The policy states '*In all cases, and in particular with the Strategic Sites, the suitability of sites to be brought forward for development will be determined following satisfactory demonstration of how all necessary infrastructure to enable development will be funded and delivered. This should be thoroughly demonstrated with particular reference to the Council's most up to date Infrastructure Delivery Plan'.

*I do not believe that the proposed Strategic Sites including Webheath ADR and the proposed site at Foxlydiate have demonstrated sufficiently that they will be capable of being brought forward for development in terms of infrastructure funding and delivery. There is no evidence included to support these two sites that demonstrates there will be a viable method of achieving this. The Monitoring and Implementation table identifies the evidence base for this policy as being '*Strategic Housing Market Assessment(2012) Redditch Borough Council RONA (2012), Strategic housing Land Availability Assessment (2012), NPFF and RSS evidence'. *None of these documents contain information related to the funding or delivery of such infrastructure, and so the policy itself has no means of proving the suitability of sites for development.*

Policy 5 - Effective and efficient use of land must be sought in all new development schemes.

*The reasoned justification for this policy states that '*One of the most important considerations will be the retention of the existing character of residential areas. Development which significantly increases the proportion of ground coverage or the scale of proposed buildings is likely to be out of keeping with its surroundings and therefore is likely to be unacceptable and will be refused'.

The southern side of the Webheath ADR backs on to Crumpfields Lane, a semi-rural lane running out in to the countryside. The properties along Crumpfields Lane are in the main, individual designed character dwellings, with large gardens (many ½ acre in size). Any development at the indicative density proposed for the Webheath ADR will result in failure to meet the requirements of this policy, and thus by virtue of the policies own criteria should be refused.

Policy 19 – Sustainable Travel and Accessibility

*Policy 19, subsection (v) aims to '*effectively managing the Primary Route Network (PRN) and prevent new accesses on to it'. *The A441 forms a key element of the PRN as confirmed on*

the Transport Map within the documentation. In order to successfully develop the proposed site at Foxlydiate, surely there will be a requirement to incorporate an access on to the A448, which is highlighted in various evidence documents as being a key route to accommodate vehicle movements from the proposed site. In fact, given the acknowledged poor local road network around Webheath, such access to the A448 will be essential to support the anticipated volume of traffic from the suggested 2400+ dwellings at this location. On this basis, large scale development at Foxlydiate would act to work against Policy 19(v) and as such, this site should be removed from consideration. Even if the access is outside of the Redditch boundary, the impact will be the same, and will inhibit the strategic function of this route, in defiance of the 'reasoned justification' for Policy 19.

Alternative sites for large scale development such as Bordesley Park, include provisions for a full bypass at Bordesley, acting to significantly improve access to the A448 dual carriageway, and thus enhancing the conditions for existing local residents, and improving, rather than inhibiting the PRN.

Policy 48 – Webheath Strategic Site

*Subsection (ii) – the design of this site must…..'*improve the character and quality of the Webheath area and the way it functions'. *Large scale development on the Webheath ADR will certainly not serve to improve the character of the Webheath area, which is already recognised by locals as one of the last semi-rural style locations to live in Redditch with quality, character dwellings, and as such is an aspirational location. There is no scope for local road network improvements, as acknowledged by WCC / developers, who fail to provide any indication of mitigation for this in their transport assessments. On this basis, the anticipated high level of additional traffic which development of the Webheath ADR will generate, will be hugely detrimental to the way in which the area functions, and as such, development on this site would be in contravention of Policy 48(ii)*

*Subsection(iii) supports the fact that the '*open character of the site should be retained'. The ADR is currently completely open space – farmland, fields and meadows, noted as being of high landscape value (WYG 2009 report). Any development within the site would destroy the open character of the site completely, and violate this policy.

Subsection(iv) states that *'a central sense of place should be provided through good design, with views from and in to the site incorporated and maximised'. Views in to the site currently see open fields – but as soon as any development took place on the ADR, these views would be interrupted and obliterated. Surely the current views are maximised, so development here would reduce this, and contravene Policy 48(iv).*

*Subsection(v) requests that '*topography of the site should be respected with any excessive remodelling of the land avoided wherever possible'. *Potential planning applications already*

proposed for this site incorporate significant remodelling of the land form, in order to ensure that the number of dwellings on the site can be maximised. In fact developers original suggestions that the site was only suitable for 400 dwellings, were criticised by RBC planners, who forced them to re-work the designs such that up to 600 dwellings would be viable. This is only possible by large scale topography modification, which would in turn work against Policy 48(v).

*The supporting reasoning for Policy 48 relating to accessibility states that '*the need to facilitate public transport provision is essential in this site due to the current limited service to the area'. *This statement does not in fact provide positive reasoning behind the choice of the Webheath ADR as a suitable site for development. It demonstrates further that the ADR fails on 'sustainable' counts time after time.*

*Reasoning behind the Transport Infrastructure for Policy 48 says '*with regard to the specific access point for the phase one of this development, the single point of access from Church Road and emergency access from Pumphouse Lane have been designed to take account of current highway constraints and the need to retain existing trees on the site (which is important at this particular location due to close proximity to Green Belt land). *This purely highlights the fact that there are highway constraints, as well as the Green Belt proximity constraints, demonstrating that this is far from being a naturally sustainable location to develop.*

The last paragraph in this section relates to flood risk for this site. However, it is the last sentence in this paragraph which causes the most concern…

'An emergency evacuation plan should be prepared as part of the FRA/drainage impact assessment for the proposed development'.

Does this statement really act to promote the area as the viable, sustainable, risk free site that Redditch Borough Council claim ? Do we really want to be developing 600 dwellings on a site that requires an emergency evacuation plan for flooding ?

APPENDIX 2 – SCHEDULE OF HOUSING SITES

Why is the data for this appendix not current ? The data provided is for 1 April 2011 – 31 March 2012. Why is there no data for 2012-2013 ? This evidence is not up to date.

In addition, the figures shown, highlight that in the specified time period above, only 63 dwellings were completed.

This means that the supposed Strategic Housing Target of 6380, less those 63 completions, leaves 6317 to be completed during the Local Plan No. 4 period (17 years).

That equates to approximately 371 dwellings per year for 17 years. This means that there will be more than one house sold or rented every single day, for the next 17 years. Does that really sound like a viable target, given that the last available data shows that there were only 63 dwellings constructed in a 12 month period ?

Surely the housing figure target is of questionable integrity, despite the Councils best efforts to justify it ?

OTHER EVIDENCE DOCUMENTS

LOCAL PLAN NO. 4 SUSTAINABILITY APPRAISAL 2013

The Sustainabiity Appraisal for the strategic development sites contains several invalid scores within the matrix table for Webheath.

Local Plan Objective	Original Webheath Score	Corrected Webheath Score
1.To maintain and provide a high quality natural, rural and historic environment with a Green Infrastructure network which maximises opportunities for biodiversity value, wildlife and ecological connectivity;	**+/-**	**-**
2. To ensure that all new development in Redditch Borough will work towards theachievement of being carbon neutral in line with the National Standards;	**+**	**+/-**
3. To reduce the causes of, minimise the impacts of and adapt to climate change;	**+/-**	**+/-**
4. To protect, promote and where possible enhance the quality of the Boroughs landscape and Redditch Borough's other distinctive features;	**--**	**--**
5. To encourage safer, sustainable travel patterns, improve accessibility and maintain a balanced road hierarchy and reduce the need to travel	**+**	**-**
6. To enhance the visitor economy and Redditch's cultural and leisure opportunities including Abbey Stadium;	**+**	**+/-**
7. Reduce crime and anti social behaviour and the fear of crime through high quality design, with regeneration achieved at the former New Town District Centres;	**+**	**+**
8. To improve the vitality and viability of Town and District Centres in the Borough by day and night;	**+**	**+/-**
9. To have sufficient homes meeting demographic needs, including affordable housing, providing for a range, mix, and type in the best locations, including on Strategic Sites;	**++**	**++**
10. To have a strong, attractive, diverse and enterprising economic base with sufficient employment land, including Strategic Sites and employees with higher skillslevels;	**+**	**+/-**
11. To protect and enhance water, air and soil and minimise flood risk;	**-**	**-**
12. Ensuring there is a range of health facilities that support existing and new communities and to promote the role of healthy living through good planning;	**0**	**0**
13. To have demonstrated compliance with the "duty to cooperate" by providing for Redditch's growth across local authority boundaries.	**N/A**	**N/A**
TOTAL SCORE	**+5**	**-1**

The reasoning behind these corrections is included below:

Objective 1

The existing area comprises open fields, farmland and is of high landscape value. No type of development in such an area can claim to maintain such a high standard of environment, without some negative impact. The score therefore has been corrected from +/- to -.

Objective 2

Any new housing development can be designed as carbon neutral, but the knock-on effect of the additional vehicular movements, irrespective of alternative transport proposals, will in the longer term outweigh this neutrality. The score has therefore been corrected from + to +/-.

Objective 3 - *No change*

Objective 4 - *No change*

Objective 5

It is acknowledged throughout the various reports and supporting evidence, that the location of the Webheath ADR is not best suited to fully encourage more sustainable travel patterns. Although encouragement may be provided, the main form of transport will remain as the motor vehicle, and as such, this encouragement will be negated by the increased volume of traffic. The score has been adjusted from + to -.

Objective 6

The Webheath ADR is located far away from the Towns facilities, especially the Abbey Stadium. There will be no real leisure improvement, in fact existing there is likely to be a reduction in local leisure experience with the loss of the ADR land, as this is used extensively for walking, rambling etc. This will not be as ideal if 600 houses are on the site. The score has been corrected from + to +/-.

Objective 7 - *No change*

Objective 8

With a high percentage of travel anticipated to locations outside of the Borough, improvement in the viability and vitality of Town and District Centres is not a forgone conclusion. The + score has been corrected to +/-.

Objective 9 - *No change*

Objective 10

The potential for employment within the ADR development, or local to it, is minimal – there are no significant local employment centres, and any facilities on site will only provide

miniscule amounts of opportunity, vs the scale of the site. The score has therefore been corrected from + to +/-.

Objective 11 - *No change*

Objective 12 - *No change*

Objective 13 - *N/A*

The impact of these corrections is to alter the total score from +5 to -1. This demonstrates that the reality is, that if the Webheath ADR site is promoted for development, it will be unsustainable against the Local Plan Objectives.

The Webheath ADR should therefore be removed from Local Plan No.4.

THE LOCAL PLAN PROCESS

The Local Plan process relies heavily on a strong evidence base to support its policies. A key aspect of this evidence is the Redditch Growth Plan, which, along with several other reference documents, is key to providing the figures for the number of new dwellings required in the Borough (and as cross-boundary development). The data within this Growth Plan has a major impact on the Local Plan, as it dictates requirements in terms of land availability for housing, and thus the strategies, policies and evidence that will be required in order to provide a viable Local Plan.

It is therefore rational to expect that this Growth Plan is in itself, an evidenced, and proven set of documents, which has been through its own process of validation in order to obtain approval.

However, as Redditch Borough Council have deemed to run both the Consultation processes for Local Plan No.4, and the Redditch Growth Plan concurrently, there can have been no prior approval for the Redditch Growth Plan. Therefore, the evidence used to substantiate the policies in Local Plan No.4 is in fact invalid, until it has been approved itself, through a full consultation process.

Both consultations will have run for the same period of time, at the same time. It is therefore not possible for evidence in one of the proposals to inform policies and statements in the other.

The Housing Growth Plan Consultation should have been taken through its full validation cycle prior to being used as evidence to support the Local Plan No.4 and its consultation process. Otherwise, if any single aspect of one of the plans is found to be unsound, this will directly impact on the other.

For these reasons, the Local Plan No.4 consultation process should be suspended, and only revisited once the Housing Growth Plan has been through its full approval process and is a

published document in its own right. Only then can it be used to evidence a Local Plan consultation.

NON-TESTING OF SITES AGAINST CURRENT CRITERIA

Throughout the Local Plan 4 and Housing Growth Plan, there is an inference that the Webheath ADR can automatically be included for development, simply because it has already been 'tested' and deemed suitable for this purpose, through previous planning decisions.

However, any such testing took place sufficiently long ago, that these results cannot and should not be relied upon, as there is a high risk that the criteria for testing will have changed since they were originally bought forward to be assessed.

Webheath ADR has never in fact been fully tested at Inspectorate level as a potential housing site for completion within a designated plan period.

With the current Sustainability requirements, all the latest evidence points towards the fact that the ADR would not be deemed viable for development, and as such would have to be removed from Local Plan No.4.

CROSS BOUNDARY SITES

A key to Local Plan No.4's ability to meet the Housing Growth Plans housing numbers relates to cross-boundary development.

The sites selected for this, have been questioned in other objections, but in any case, these sites and their impacts are not considered sufficiently in Local Plan No.4. Council Tax, New Homes Bonus, and other economic benefits will be felt by Bromsgrove District Council, whilst Redditch Borough Council (and residents) deal with the real problems that will manifest on their doorstep – whether through transport issues, crime, or any of the other elements that come with a large scale housing development.

Although it is understood, this is the Local Plan for Redditch, so policies and statements are not directly relevant to land outside of the Borough, where such major developments are proposed right on the Boroughs border, there should be some means of balancing this with appropriate 'combined' policies to manage impact..

For example, what if a policy within Bromsgrove Local Plan related to any such cross-border site, contradicts, or contravenes a policy on Redditch Local Plan No. 4? Although it is accepted the development will be on Bromsgrove land, the impact of policies is more likely to directly affect Redditch due to the proximity of the development. No management structure or plan seems to be in place to deal with such instances. On this basis, Local Plan No.4 fails to provide sufficient support for the cross-border development proposals which it incorporates.

GREEN BELT RELEASE TO MEET GROWTH NEEDS 2013

*This report refers to the fact that '*Green Belt located South West of the Borough has been extensively reviewed in other evidence base studies and is not considered in this study'.

There is a presumption to this statement that all of the information contained within these 'other evidence based studies' is both current and valid in terms of planning policies etc.

To be selective in its approach to Green Belt areas does not demonstrate a valid evidence base. How can any impact to other possible sites, even if they themselves are not Green Belt, be assessed without reviewing evidence for all respective areas. Webheath ADR, although not classified as Green Belt, abuts Green Belt, and as the ADR itself has also been omitted from any up to date validation exercise, the potential for negative impact on Green Belt is increased.

This report also references content from White Young Green Reports, including the 'Future Growth Implications of Redditch Second Stage Report 2009'.

This report includes a detailed assessment of the Webheath ADR, which includes the following statements:

'5.04 This is an undulating area of land, in our opinion, high landscape value containing pasture land with mature hedgerows and trees of individual quality. The landform of the site integrates the site in to the open countryside to the west with twin valleys running south-west to north-east. Any development would in our view be intrusive and poorly related to the existing developed areas.'

'5.06 It is understood that 150 dwellings have already been constructed in the area reducing the capacity to 450 dwellings. Accessibility to public transport, the town centre and main employment sites is poor. For these reasons we are of the opinion that the Webheath ADR should not be developed and would more properly be treated as an extension to the neighbouring Green Belt'.

If RBC are happy to use this WYG report as evidence to support the inclusion of other sites for development, should they not have a consistent approach to the use of its content ? If this were the case, then they would recognise the poor suitability of the Webheath ADR for development, and remove it from the Local Plan No.4. Surely it is not plausible or reasonable to pick and choose which elements of a report to take notice of? This demonstrates a poor level of judgement has been used in the production and validation of Local Plan No.4.