Appendix A – Responses to Preferred Draft Core Strategy consultation

## *Analysis of Green Belt and Areas of Development Restraint*

| **Policy/ Issue/ Para/ Doc** | **Respondent No./ Representation No.** | **Summary of comment** | **Council's response** | **Council's proposed action** |
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| Analysis of Green Belt and ADR within Redditch Borough | 022/104; RPS | *Detailed Landscape Assessment*<br><br>RPS note that this document is intended to 'tell the story' of each of the Green Belt and ADR sites and as such refers to a number of other sources of information. As such, it presents information regarding each site but does not undertake a detailed landscape assessment of each of the parcels of land or qualify the findings as one would expect against PPG2: Green Belt. | Para. 2.1 of the Analysis of GB Study makes it abundantly evident that a comprehensive overview of Green Belt parcels was undertaken by much reference to a diverse set of previous studies to demonstrate the various factors that would mitigate against development in the Green Belt in Redditch. This paragraph concludes by stating that this diverse set of studies provided and supported the Council's reasoning for avoiding development in the Green belt in Redditch.<br><br>The Plan at Appendix 1 of the | No change |

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| | | | Analysis of GB Study is an abstract of information from the Worcestershire Landscape Character Assessment and gives a broad assessment of landscape sensitivity around Redditch. The plan indicates that the majority of the land which is the subject of the 'north west urban extension' promulgated by RPS on behalf of clients is of high landscape sensitivity and only a small tract of land to the north west to be medium landscape sensitivity. It is accepted that the Brockhill East ADR is also within the area of high landscape sensitivity but this will be discussed later in this response.<br><br>In relation to the references to PPG2 by RPS, it is pertinent to refer to two of the five purposes of including land in Green Belts in Paragraph 1.5 of PPG2 which are most relevant to the area of the Green Belt which is the subject | |

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| | | | of this response viz:<br><br>• to check the unrestricted sprawl of large built-up areas<br>• to assist safeguarding the countryside from encroachment<br><br>Paragraph 1.6 of PPG2 relates to 'The use of land in Green Belts' and it is also pertinent to restate that one of the objectives in relation to the use of land within Green Belts is:<br><br>• To retain attractive landscapes, and enhance landscapes, near to where people live.<br><br>The in-depth studies undertaken so far have been sufficient to assess the individual parcels of land in accordance with the spirit of PPG2 and particularly the purposes and objectives of | |

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| | | | PPG2 set out above. | |
| | | *Brockhill East Area of Development Restraint* –<br><br>The study considers the Brockhill East ADR in detail which forms part of the proposed North West Redditch Urban Expansion and notes the conclusion that it is '*acceptable in planning terms and the Area is preferable to other Green Belt areas south-west of Redditch and west of Astwood bank*' based on the findings in the study. RPS fully concurs with the findings in the report and the conclusion that development at Brockhill is acceptable. RPS also comment that it is worthy of note that the findings apply in large measure to the adjoining land in the Green Belt adjacent to Brockhill in Redditch and in Bromsgrove Districts. | It is noted that RPS concurs with the Analysis of GB Study findings in relation to Brockhill ADR and that development here is acceptable. This was the stance of the Council at the time of drafting the Analysis of GB Study when the report was drafted in the light of information available to the authority at that time. However, since the preparation and completion of the Analysis of GB Report, White Young Green (WYG) completed their Stage II Report. It is evidenced in previous planning documentation relating to the Borough of Redditch Local Plans 2 & 3 that the three ADRs had potential for development. It should be noted that during previous plan preparation, officers were restricted to searching for appropriate and suitable land for development within the Borough's administrative boundary only. The three | Consider the contributions which could be made by the ADRs following joint consultation with Bromsgrove District Council.<br><br>Update Key Diagram to show the broad location of the SUE /SUEs boundary to be determined in collaboration with Bromsgrove District Council |

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| | | | ADRs offered the most appropriate locations for development at that time. Changes to the planning system have allowed for cross-boundary investigation for sustainable locations for Redditch related development. Officers will need to reconsider the contribution that ADR land could make to meeting the housing allocation following joint consultation with Bromsgrove District Council. | |
| | | Despite the Council reaching conclusions independently, the evidence contained within the Council's document contrasts with findings within the WYG Stage 2 Report which RPS understands was also an independent assessment and published at the same time. RPS cannot therefore comprehend how the Council can attach significant weight to two pieces of its evidence that are contradictory and claim that they are both robust enough to inform and support a justified | Paragraph 5.02 of the Stage II Report explained that WYG had reviewed sites within Redditch Borough including Brockhill. WYG concluded in their recommendation in Paragraphs 7.01 and 7.02 that *"Whilst all the options for urban extensions are to a greater lesser degree harmful, we consider that a concentration of development at Bordesley Park demonstrates the greatest opportunity to accommodate either development option* | Consider the contributions which could be made by the ADRs following joint consultation with Bromsgrove District Council.<br><br>Update Key Diagram to show the broad location of the SUE /SUEs boundary to be determined in collaboration with Bromsgrove District Council. |

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| | | Core Strategy. | *within manageable impacts*. *The site is within the designated Green Belt but we are of the opinion that this section is less vulnerable than the Green Belt that separates Redditch from Astwood Bank or Studley and the topography of the area assists in containing the development and minimising the impacts on the surrounding countryside than would be the case at Webheath ADR, Brockhill ADR or Foxlydiate Woods".* Paragraph 7.12 of the Stage II Report went on to recommend that the three sites currently designated as ADRs including Brockhill in Local Plan No.3 should be added to the Green Belt and therefore should not continue to be considered for development. Officers will need to reconsider the contribution that ADR land could make to meeting the housing allocation following receipt of the WMRSS Phase Two Panel Report. | |

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| | | *The Brockhill Area Green Belt* –<br><br>Section 5 of the report appraises the area of Green Belt within the Brockhill Area which is in part adjacent to the Brockhill ADR. RPS is concerned that conclusions in Section 5 of the report for the Brockhill Green Belt Area are contradictory to the findings set out later in the report and in respect of the ADR land, despite being adjacent to it. This conflict is particularly pertinent to issues that have wider relevance than just site boundaries, such as landscape and visual impact. | RPS comment in Paragraph 5.5 of the representation that they are concerned to read that conclusions in Section 5 for the Brockhill Green Belt Area in the Analysis of GB Study report are contradictory to the findings set out later in the report and repeated in respect of ADR land. However, the Council contend that this is not the case as it should be evident from reading Section 5 of the Analysis of GB report that the previous studies (including the 1973 Joint Study of Feasibility' and 'Redditch Joint Study 1988) considered the 'greater' Green Belt area including land at Hewell Grange in Bromsgrove District. Despite the Joint Study of Feasibility and the Redditch Joint Study having been drafted some 30 and 21 years ago respectively, their findings are still valid today in the opinion of the Borough Council and it is relevant to reiterate some of those findings. The 1973 Joint | Consider the contributions which could be made by the ADRs following joint consultation with Bromsgrove District Council.<br><br>Update Key Diagram to show the broad location of the SUE /SUEs boundary to be determined in collaboration with Bromsgrove District Council |

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| | | | Study of<br>Feasibility considered that the landscape quality in this area presented two kinds of restraint upon development in the Brockhill area namely the high landscape value and the extensive stands of trees (which were and still are particularly accentuated at Hewell Grange immediately abutting the Brockhill area) and both affected the areas feasibility for development. The Redditch Joint Study of 1988 drew attention amongst other things to ridges of high ground which would be prominent for some distance from the surrounding area contrary to prevailing Structure Plan policies. Ridge lines were identified at Hewell Park and Butlers Hill to the Northwest of Redditch and in the vicinity of the Brockhill area.<br>Development in these areas was considered to be ill advised based on those findings. Although in | |

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| | | | Bromsgrove District, parts of Hewell Park, Cladshill and Brockhill Wood were identified as being of high ecological value all of which lead to the conclusion that this part of the Green Belt is still considered unsuitable for development including the land to which RPS relates. The Landscape and Visual Assessment for the North West Redditch Master Plan (NWRMP) also emphasised the importance of this area and is discussed in Paragraph 8.3.11 et seq of the Analysis of GB Study. In addition to the references to this assessment in the Analysis of GB Study, Paragraphs 4.3 and 4.14 of the Landscape and Visual Assessment are particularly pertinent and are set out in full below:<br><br>*<u>Landscape Type 1: Wooded High Ground</u>*<br><br>*4.13 The Wooded High Ground is defined by* | |

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| | | | *large areas of irregular shaped woodland, such as Brockhill Wood, situated on or around high or steeply sloping ground. The ridge of Butler's Hill, Brock Hill and Lowan's Farm, forms a prominent and visually important landscape feature, enclosing the valleys below. Small farmsteads and clusters of farm buildings occur throughout the area. There is also evidence of mining scattered across the hillside. Aside from the large areas of woodland, there is little in terms of significant vegetation, with many field boundaries now solely enclosed by post and wire fencing. Hedgerows along farm tracks and the railway line provide some linear features, but, in general* | |

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| | | | *the field boundaries are gappy and inconsistent throughout the area.*<br><br>*4.14 Most of the Wooded High Ground is designated as a Landscape Protection Area due to its visual prominence and well wooded character. This area would be sensitive to change and contains a number of valued landscaped features.*<br><br>Although only indicating a broad indication of landscape sensitivity round Redditch, the abstract of information from the Worcestershire Landscape Sensitivity shown on Plan 1 is more than sufficient to highlight the importance of the landscape in the north west area around Redditch and supports the findings of those earlier studies. The RPS reference to a disparity between the conclusions in | |

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| | | | Section 5 and Para 9.06 is hard to understand. Clearly, Section 5 of the Analysis of GB report discusses the 'greater' Green Belt in the Brockhill area whilst Paragraph 9.06 solely discusses the Brockhill ADR which had been examined in depth by the Inspector's examining Local Plan No.2 and Local Plan No.3. | |
| | | Paragraph 5.7.0 refers to and attaches weight to the WYG Report landscape and visual analysis assessment, although it is not clear as to which WYG report the paragraph refers to, as neither conforms with the statement made. The WYG report has not undertaken any form of assessment of the Green Belt in respect of its functions as set out in PPG2. It has undertaken an over simplistic and out of date SWOT analysis which is not a tool fit for purpose for assessing such issues, in particular Green Belt and visual impact. Such an approach will | For the avoidance of doubt, it should be made clear that Paragraph 5.7.0 of the Analysis of Green Belt Report (Paragraph 5.6 of RPS representations) refers to the 'WYG Stage I Report' prepared in December 2007. Although dated 27th October 2008, the Analysis of GB report was in fact drafted prior to the receipt of the WYG Stage II Report and explains why there is no identification to this being the 'Stage I Report'. Indeed, the Bibliography to the Analysis of GB report concludes by referring solely to the 'Joint Study into Future Growth | Consider the contributions which could be made by the ADRs following joint consultation with Bromsgrove District Council.<br><br>Update Key Diagram to show the broad location of the SUE /SUEs boundary to be determined in collaboration with Bromsgrove District Council |

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| | | not stand scrutiny at examination and a comprehensive approach is required that is qualified and consistent in the opinion of RPS. The Green Belt land in the Borough has not been considered in RPS's view with open mind by the authors of this report | Implications of Redditch New Town to 2026' prepared in December 2007 and not to the later Stage II Report. The outcome of the WYG Stage II Report arose from the further independent studies undertaken by WYG following completion of the Stage I Report.<br><br>In relation to the assertions made by RPS in Paragraph 5.6 of their representations that the WYG report '*has not undertaken any form of assessment of the Green Belt in respect of its functions as set out in PPG2'* and that WYG '*has undertaken an over simplistic and out of date SWOT analysis which RPS has already set out above, is not a tool fit for purpose for assessing such issues, in particular Green belt and visual impact'* cannot be accepted by the Council. The Council consider that both the WYG Stage I and Stage II Reports | |

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| | | | demonstrate adequate consideration of the purposes and objectives of the Green Belt as set out in PPG2. Some specific references (although there are many) to both the Stage I and Stage II reports may be useful to demonstrate that there has been an adequate examination in line with PPG2 as follows:<br><br><u>WYG Stage I Report</u><br><br>Paragraph 2.04 et seq – Current Strategic Planning Context – aims and purposes of the Green Belt according to PPG2 restated.<br><br>Paragraph 7.04 SWOT Analysis – WYG assessed in each case the extent to which the Green Belt purposes (PPG 2) would be harmed.<br><br>Paragraph 8.28 South West Quadrant – loss of attractive countryside and coalescence. | |

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| | | | Paragraph 9.05Conclusions – Options 2 and 3 perceived as major incursions into the countryside.<br><br><u>WYG Stage II Report</u><br><br>Paragraph 4.04 Constraints on Development – The Green Belt – PPG2 purposes of Green Belts<br><br>Paragraph 4.05 Constraints on Development – Redditch not a historic town but principal aim of Redditch Green Belt to prevent neighbouring towns coalescing, to prevent unnecessary sprawl and to safeguard the countryside.<br><br>Paragraph 5.13 Brockhill – potential effects of developing slopes in an area of landscape value outweigh benefits of location near town centre.<br><br>Paragraph 7.09 – Webheath ADR – not suitable for development – quality and | |

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| | | | character of landscape. | |
| | | In the context of the requirement to undertake a full comprehensive assessment of the Green Belt in this area RPS has set out a number of initial points in Paragraph 5.8 and considered Bordesley Park against similar criteria. The North West Urban Extension land should be positively considered for strategic site allocation on the grounds that:<br>• The landscape is not unduly prominent;<br>• The development effectively will be contained within the bowls of the Batchley Brook and Red Ditch valleys;<br>• Less best and most versatile agricultural land would be affected at North West Redditch than at Bordesley Park;<br>• Existing woodland would be protected and linkages provided between them;<br>• A lesser extent of sand and | Paragraphs 5.0.0 and 5.1.2 of the Analysis of GB Study report drew attention to the concerns expressed in the earlier studies of 1973 and 1988 regarding the high landscape value and ridge lines of the Brockhill, Hewell Grange and Foxlydiate areas which still hold good in the opinion of the Borough Council. It is also relevant to draw further attention to the Landscape and Visual Assessment of the NWRMP. Paragraph 4.13 and 4.14 of that assessment describe the landscape of much of this area and Plan LO5 and Plan LO2 illustrate the landscape character and landscape planning context respectively. Just to recap, much of the Woodland High Ground is designated as a Landscape Protection Area due to its visual prominence and well wooded character and it is emphasised that the area would be sensitive to change | Consider the contributions which could be made by the ADRs following joint consultation with Bromsgrove District Council.<br><br>Update Key Diagram to show the broad location of the SUE /SUEs boundary to be determined in collaboration with Bromsgrove District Council |

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| | | gravel deposits would be affected than at Bordesley Park;<br>• Given that the Green Belt boundary needs to be reviewed, the proposals can provide a very satisfactory altered Green Belt boundary that is compliant with PPG2 advice. | and contains a number of valued landscape features. This prominent and visually important landscape feature incorporates the eastern half of the North West Urban Extension promoted by RPS. Whilst RPS contend that these landscape protection areas are no longer sustainable and should be reviewed in the light of current advice, this view is conjectural and they are nonetheless designated areas in the Bromsgrove Local Plan and highlight the importance of this visually important area. Paragraph 5.10 of the Stage II Report draws attention to the Plan 5 showing the Brockhill topography and in particular, to the prominent ridge running into the site from north-west to south-east and that the site's topography may reduce its capacity particularly as it would be necessary to take into account the distant views of the site from the surrounding area. According to the Ministry of | |

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| | | | Agriculture, Fisheries and Food Land Classification Map published in 1969 there would seem to be little difference in the classification of agricultural land in both areas. Both areas are shown primarily as Grade 3 agricultural Land on the 1969 Land Classification Map. The North West Urban Extension is mainly Grade 3 interspersed with some land primarily in non-agricultural use i.e. woodland whilst Bordesley Park is primarily Grade 3 with some land predominantly in urban use around the A441 at Bordesley and B4101. It is accepted that the existing woodland could be incorporated within the potential development areas with appropriate linkages. Examination of the County of Hereford and Worcester Minerals Local Plan adopted in April 1967 would suggest that there is little real difference in sand and gravel deposits in either area. The proposals map | |

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| | | | does show in broad terms, 'Identified Minerals Deposits' of sand and gravel both at Bordesley and Foxlydiate which may not be significantly different in extent if any development areas have finally been adopted in either area. | |
| | | It is also worthy of note that an element of the Green Belt land adjacent to the Brockhill ADR is identified in the WYG open space assessment as having a limited value in terms of a natural habitat and no amenity value. This area referred to is illustrated in Plan 1 of Appendix 1 of the WYG Study. | The Council consider that this comment is perhaps erroneous. The northern area is identified in red as low value semi-natural open space as part of Site Ref 3 on Plan 1 of Appendix 1 but it is not designated as Primarily Open Space in Local Plan No.3. However, it is designated Green Belt in Local Plan No.3 and this particular area is not discussed in the Amenity Open Space Review Summary Sheets on Page 7 of Appendix 1. | Consider the contributions which could be made by the ADRs following joint consultation with Bromsgrove District Council.<br><br>Update Key Diagram to show the broad location of the SUE /SUEs boundary to be determined in collaboration with Bromsgrove District Council |
| | | The study provides a good starting point for collating information on the Redditch Green Belt and ADR land but it cannot be considered a | The Analysis of GB Study makes it abundantly evident that a review of Green Belt parcels was undertaken by much reference to a diverse | Consider the contributions which could be made by the ADRs following joint consultation with Bromsgrove District Council. |

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| | | comprehensive policy assessment of the Green Belt and ADR land in itself as its conclusions are not qualified on primary evidence, nor are the references to other sources. As a result of this, its findings are inconsistent and also with that of other elements of the LDF evidence base. The Study should therefore be reviewed and be provided with supplementary primary evidence supplied through a qualified and comprehensive Green belt Review and Landscape Character Assessment of the area. This will enable it to draw on more appropriate evidence and remove inconsistencies that occur in the document. | set of previous studies demonstrating the various factors that would militate against development in the Green Belt in Redditch. The Council contend that the in-depth studies undertaken so far have been sufficient to assess land in the Green Belt in accordance with the objectives set out in PPG2. In relation to the Brockhill East Area of Development Restraint, RPS's concurrence with the findings and that development here was acceptable was noted. This was the stance of the Council at the time of drafting the Analysis of GB Study in the light of information available to the authority at that time. However, since the preparation and completion of the Analysis of GB Report, WYG completed their Stage II Report which was not available when the report was completed. The Council accept that these recommendations contrast with their previous | Update Key Diagram to show the broad location of the SUE /SUEs boundary to be determined in collaboration with Bromsgrove District Council |

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| | | | findings in Analysis of GB Report but having reviewed these and previous findings, the Council incorporated these new conclusions into what was presented in the Preferred Draft Core Strategy as an alternative approach, because options in and around Redditch are limited. | |

## *Attractive Facilities*

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Attractive facilities Policy SP.7 | 017/241 CPRE | Abbey Stadium. Due to economic downturn, consider pursuing a smaller scale build? With swimming pool, renovate indoor /outdoor activity areas whilst marking out those environmental areas that have to be protected such as :-<br><br>Criterion viii River Arrow<br>Criterion ix Arrow Valley | Accept comments, but want to ensure that the scale of improved facilities serve the purposes of the local residents first and foremost and then serve the needs of the public further afield, as this would in turn generate tourism for the area. However, it is accepted that any development of the site would need to consider the | No action. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | Country Park<br>Cemetery and crematorium for peace and quiet plus sensitive consideration<br>And respect setting of Bordesley Lodge Farmhouse. | sensitivity of some of the environmental areas within the park and surrounding area, and this is included within the body of the policy. | |
| | | An Environmental Impact Assessment regardless of overall size and a sequential test as per criterion iv will be required. CPRE consider an approach of designing in these facilities in situ and not cram the whole site with facilities that are not appropriate for Redditch residents. | Accept comments. Officers to consider EIA guidance to determine whether it still applies. | Refer to EIA guidance prior to amending criterion iv. |
| | | Another opportunity needs to be taken up to interest the Lawn Tennis Association in improving the tennis facilities and to promote the sport. | Comment is outside the remit of the Core Strategy. | No action. |
| Attractive | 017/246 | Cinema has been left out of | The first sentence of the | No action. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| facilities Policy H.1 | CPRE | first sentence / paragraph. | reasoned justification refers to museums, visitor centres and accommodation such as hotels and guest houses. However, the second sentence states the purposes of the policy and includes reference to the cinema in addition to other sport and recreation uses as well as restaurants and bingo halls etc. Therefore there is no need to reference cinema in first sentence. | |
| Attractive facilities Policy SP.7 | 021/077 WMRA | SP.7 generally aligns with emerging WMRSS policy SR2D and other relevant WMRSS policies in particular emerging WMRSS policy PA10. | Note comment. | No action. |
| Attractive facilities Policy H.1 | 021/090 WMRA | Policy H.1 is in line with emerging WMRSS policy PA.10. | Note comment. | No action. |
| Attractive facilities Policy H.3 | 021/092 WMRA | H.3 accords with WMRSS policy UR4 and SR2D | Note comment. | No action. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Attractive facilities Policy SC.2 | 021/094 WMRA | SC.2 accords with WMRSS policies CF5A and CF6 | Note comment. | No action. |
| Attractive facilities Policy SC.3 | 021/095 WMRA | SC.3 accords with WMRSS policy CF.7. | Note comment. | No action. |
| Attractive facilities Policy SC.6 | 021/098 WMRA | SC.6 is in line with WMRSS policy CF.9 | Note comment. | No action. |
| Attractive facilities Policy SP.7 | 027/474 Highways Agency | Pleased that SP.7 'Abbey Stadium' makes provision for developer contributions towards infrastructure improvements, including public transport, pedestrian and cycle facilities and off site highway works. The Highways Agency assessed the planning application for the site in 2006, and while would be happy to reassess any future proposals, it remains possible that works may be needed at the junction to accommodate traffic generated by the development. | Note comment. | Ensure that the contributions / improvements etc. remains part of the policy SP.7 and investigated in the development of an Infrastructure Delivery Plan. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Attractive facilities Policy SC.6 | 028/107 GOWM | Pleased that the issue in respect to the needs of gypsies and travellers and travelling show people is being addressed. | Note comment. | No action |
| Attractive facilities H.3 | 029/710 Tetlow King RSL plng consortium | Health and Well Being. Suggest that policy in health and well being be supplemented with an additional policy on the provision of care for the elderly. Policy should highlight how ageing population is being accommodated within overall housing mix. National Strategy for Housing in Ageing Society (2008) highlights the need for policies to take into account the needs of the elderly. Important for Core Strategy to encourage separate consideration of this group. Reference should be made in policy regarding supporting development of residential care homes, extra | The draft Core Strategy has appropriately dealt with older person accommodation under Policy SC.1. | No action. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | care facilities, sheltered housing and continuing care retirement communities. Provision of such housing offers choice, frees up under occupied family sized homes and improved quality of life including improved mental and physical well being of older people. | | |
| Attractive facilities Policy H.1 and SP.7 | 049/732 Worcs. CC | Note that how policy H.1 is worded it would require Abbey Stadium to be accompanied by a master plan. It is assumed that this is the intention for Abbey Stadium. | Policy H.1 is recommended to be changed to be more wide ranging so it can set a framework for the Abbey Stadium to be implemented. It is considered that a master plan is not required for the Abbey Stadium but may be required for other large scale tourism or leisure proposals that may come forward in the Borough. | Policy H.1 to be amended to the following:- Tourism and leisure proposals, including new build, extensions or additions to existing facilities will be promoted and supported where the proposal is located in places that are sustainable and accessible by a choice of transport modes and where additional visitor numbers can be accommodated without detriment to the local environment, principally Redditch Town Centre. |

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| | | | | Tourism facilities may include museums, theatres, visitor centres and also accommodation such as hotels and guest houses. For the purpose of this policy, leisure facilities include intensive sport and recreation uses, cinemas, restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls, all of which are main Town Centre uses. Any proposals will therefore be required to comply with the relevant PPS4 tests and reference should be made to policy ES.5 Hierarchy of Centres and ES.6 Retail.<br><br>It is important that new and existing tourism and leisure facilities are supported provided that they are |

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| | | Reference to the need to protect and enhance associated ecological habits and floodplains under criteria viii of policy SP.7 and reasoned justification, reference should be made to the historic landscape of Arrow Valley. | Accept comments and insert text into policy and/or context referring to protecting the historic landscape of Arrow Valley. | sustainable and of benefit to the local economy and community<br><br>Insert in criterion viii, within the policy and its context, the need to protect the historic landscape of Arrow Valley. |
| Attractive facilities H.3 | 049/749 Worcs. CC | Improving Health and Well Being section – this section could benefit from references to public rights of way network in terms of benefits for health, reduction in car use, recreation and therefore tourism. Reference should be made to Rights of Way Improvement Plan (ROWIP) which is statutory instruments as well as the Countryside Access and Recreation Strategy. | Does not relate to specific policy in this section. These Strategies have been considered but references to these are not appropriate for the Core Strategy. | No action. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Attractive facilities | 049/750 Worcs. CC | Note – One of the issues facing development of heritage tourism is that it has not been possible to maintain consistent approach to the development of Bordesley Abbey as an educational and amenity resource. Continued investment required to fulfil its potential. | This is outside the remit of a Core Strategy. | No action. |
| Attractive facilities Policy H.1 | 049/751 Worcs. CC | Section has a practical and positive approach. However, could be a danger of silo thinking. Be useful to have more cross referencing, so tourism would also be referenced in areas such as 'sustainable communities', economic devt, transport and open space.<br><br>To provide more clarity, criterion ii in policy H.1 could be amended to refer to policy ES.5 instead of using the term | Now that the Strategy refers to attractive and cultural facilites, it is considered that any possibility of one dimensional policy areas has now diminished.<br><br>To avoid potential confusion, Criterion ii of Policy H.1 shall have the wording principally Redditch Town Centre omitted. | No action.<br><br>ii. The proposal is located in places that are sustainable and accessible by a choice of transport modes and where |

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| | | 'principally Redditch Town Centre' because it reads to mean that Redditch Town Centre is the specific local environment to be protected. Wording should be amended to include reference to biodiversity eg. 'without detriment to the local environment and biodiversity'.<br><br>The last section of the policy that all proposals must be in accordance with the rest of the LDF policies is unnecessary. | Some leisure and tourism proposals may be appropriate outside the Town Centre so long as they meet the criterion of Policy H.1. Bearing in mind that not all leisure and tourism uses constitute Town Centre uses.<br><br>Accept comment. Delete appropriate wording in policy H.1. | additional visitor numbers can be accommodated without detriment to the local environment. |
| Attractive facilities Policy H.3 | 049/753 Worcs. CC | Under 'what you told us' section, second sentence does not make sense. Should it read 'in which health related uses would NOT be acceptable'? What does policy H.3 do about the 2.5km distance away from doctors surgery which is stated as excessive on page 82? Seems as if an issue has been | Accept comment, but information will not be carried forward in the Core Strategy. The preferred approach is to enhance GP facilities in Town Centre and District Centres, including Astwood Bank. The nature of a rural area is that it is inevitable that there are some longer travel distances to | No action.<br><br>No action. |

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| | | identified, but nothing being done to address it.<br><br>Policy could have wider aims of improving Health and Well Being by making links to sustainable transport (walking and cycling, RSS policy SR2E), provision of greenspace and provision of leisure facilities clearer. Health and Well Being should recognise future health issues in relation to climate change from heat exhaustion etc. and also the future ageing of the Borough's population. This may include building standards for adaptation (RSS policy SR1Cii) and CABE 'Building for Life Standards' RSS policy SR3B. | a nearby service centre than urban areas.<br><br>The Attractive Facility Strategy is to be more wide ranging and incorporates many of these issues. | When formulating Attractive Facility policies, incorporate these issues where appropriate. |

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| Attractive facilities Policy SC6 | 049/761 Worcs. CC | Any reference to 'screening' of gypsy/traveller sites should be consistent with other housing types. I.e. There should be no inference that some types of housing development should be screened more than others. | A level of screening / landscaping is required for any form of development, and gypsy sites should not be any different from other forms of development, whether that be offices, warehousing or housing. Screening / landscaping can be in the form of planting, walling, fencing etc. This would be necessary for all forms of development to protect amenities of neighbouring occupiers | No action. |
| Attractive facilities Policy H.1? | 085/527 Turley Assoc. on behalf of Scottish Widows | Improving Health and Well Being.<br>Support for further leisure and tourism proposals is welcomed. These facilities will play an important role in enhancing the vitality and viability of the town centre. | Noted. | None. |
| Attractive facilities Policy SP.7 | 088/539 Natural England | Welcome policy sustainability credentials, particularly, requirement that development | Accept comment. | No action. |

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| | | be accessible by means other than the private car, includes green architectural and engineering features, protects and enhances River Arrow and its corridor and includes landscaping should make real contributions towards sustainability of this future development. | | |
| | | Recommend that suitable access opportunities are prioritised over the provision of the Bordesley Bypass. Policy justification quotes existing deficiencies in sports provision and social inclusion issues. Sustainable access should be prioritised in order to facilitate use of the facilities by local residents first and foremost. | Accept comments made. | Amend policy appropriately. |
| | | Realistic alternatives to the private car would also help minimise carbon emissions and | Accept comments made. | Amend policy appropriately. |

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| | | have health benefits. Recommend sustainable access, protection and enhancement of the River Arrow corridor and landscaping to protect the Country Park be considered within context of green infrastructure. A strategic consideration and delivery of the developments sustainability features would promote a better relationship with the local environment which contribute to the success of the development. E.g. attractive pedestrian and cycle links to the site are more likely to be used. If development done well, River Arrow corridor and Arrow Valley Country Park could be enhanced and promoted, engendering a sense of pride in the local environment and contributing towards the achievement of objectives 1, 2, 3, 4, 5, 6, 7 and | | |

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| | | 11 and to the aims of the Sustainable Community Strategy. | | |
| Attractive facilities Policy H.1 | 088/554 Natural England | Support sustainability requirements of this policy. The natural environment offers opportunities around tourism and leisure, and recommend that these are considered within the context of a wider consideration of green infrastructure. | Note comments. | Amend policy to ensure that tourism, leisure and healthy lifestyle are combined in revisions made to policies. |
| Attractive facilities Policy H.1 | 089/518 Theatres Trust | Policy H.1 Leisure and Tourism. Support policy and pleased to note that document acknowledges contribution Palace Theatre offers to tourism and leisure and that the Sustainability Appraisal states that existing facilities should be supported. Therefore disappointed that the Theatre is not included in the first para of the Reasoned Justification despite that the Theatre is in | Accept the comment that Theatre should be included in the Reasoned Justification. However, paragraph concerned may be rearranged in revised policy. | Amend policy to ensure that Theatre is included in revised policy / reasoned justification or intro. |

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| | | the opening paragraph of the section.<br><br>Query: Policy states that proposals for existing facilities will be supported 'where they genuinely support sustainable tourism'. Not clear what this means and criteria an existing facility may be found not to be genuinely supporting sustainable tourism. | Intention of Policy H.1 is to encourage tourism development and is intended to set a framework for more detailed policies at a later date. | Amend policy appropriately to ensure that it is wide ranging for the purposes of the Core Strategy. |
| Attractive facilities SP.7 | 093/492 Environment Agency | Abbey Stadium (page 36-38)<br>We would expect consideration of this site to be made in accordance with current planning policy for flood risk, PPS25 and SFRA<br>Assuming that in considering this site for development within Core Strategy, Sequential Test in accordance with PPS25 and with regard to the SFRA. Given the potential flood risk at the location, based on the | Accept comments made. | Will refer to PPS25 and SFRA in respect to whether policy needs to be amended in respect to flood risk. |

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| | | indicative flood zone, you would expect a level 2 SFRA to determine appropriate requirements, ascertaining what areas of the site could be developed etc.<br><br>Note policy R.7 from the LP3 has been reproduced in the preferred draft document as policy SP.7 and make the following comments:- | | |
| | | First sentence of the policy refers to draft proposals map. We seek clarification on this matter. | A draft proposals map was intended to be produced in order to provide some clarity despite this not being required at this stage. A proposals map will accompany the submission version of the Core Strategy. | No change. |
| | | Within criteria viii in the policy and reasoned justification reference is made to 'necessary mitigation works arising' from the development | Note comments. Officers will refer to PPS25 and SFRA to determine necessary policy amendments in respect to flood risk. | Consider amendments in line with PPS25. |

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| | | and the 'funding of provision and maintenance of flood defences that are required because of the development'. This is a potential concern as would expect any proposed development to be sited within flood zone 1 in the first instance, in line with PPS25 (sequential test) and the findings of the Level 1 SFRA. We would wish to see betterment to the flooding regime as a result of the proposed development and acknowledge that there is potential for this to be achieved through developer contributions.<br><br>Notwithstanding above, support the part of criteria viii in policy SP.7 to protect and enhance the River Arrow, its associated ecological habitats and its floodplain. Policy states | Accept comments made on this matter. Officers will investigate this matter to determine whether measures conflict with what the Core Strategy is trying to protect. | Define boundary of the ecological corridor for clarification purposes. |

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| | | that 'no built development will be permitted within the ecological corridor that is the River Arrow and its environs.' Would question how the River Arrow's ecological corridor and environs has been defined and would comment that defending a site may compromise and/or contradict this aspiration objective.<br><br>Criteria viii refers to development ensuring that the ecological value of the corridor and floodplain is not undermined. Would also be looking for flood risk reduction (betterment) and ecological enhancement to be achieved, in line with current planning policy. Would seek further clarification on the above matters relating to this site? | Policy will be made more wide ranging to reflect the Abbey Stadiums strategic site allocation. | Amendment to policy to make it more strategic. |

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| Attractive facilities SC.6 | 093/502 Environment Agency | Gypsies, Travellers and Travelling Show People (page 103 – 105) Recommend that last sentence of policy SC.6 is altered to include reference to flood risk as follows:<br><br>'There will be a presumption against proposals in flood zone 3 and the Green Belt, unless exceptional circumstances are demonstrated'.<br>The reasoned justification for including a reference to flood risk would be that permanently occupied caravan, mobile home and park home sites (inc. gypsy and traveller sites) are regarded as highly vulnerable development in PPS.25. Acknowledged that the instability of these structures places their occupants at special risk and they are likely to be occupied during periods when flood risk is higher (all | Policy will be made more wide ranging to reflect the Abbey Stadiums strategic site allocation. | Amendment to policy to make it more strategic. |

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| | | year). Highly vulnerable development should not be permitted within flood zone 3. | | |
| Attractive facilities Policy SP.7 | 102/149 Worcs. Archlogy Unit | Policy SP.7 viii (page 38) Include reference to the historic landscape of the Arrow Valley.<br><br>Policy SP.7 Criterion viii (page 41) Include reference to the historic landscape of the Arrow Valley. | Note comments.<br><br>Note comments. | Add detail in policy accordingly.<br><br>Add detail in policy accordingly. |
| Attractive facilities Policy SP.7 | 117/185 Randle | Build a new swimming pool at Abbey Stadium, there is no need for a snow dome and new roads. | Note comments. | Ensure policy is addressing the needs of the local people first and foremost and the level of infrastructure is based on the extent of overall development. |
| Attractive facilities | 153/512 Centro | To enhance the visitor economy and Redditch's cultural and leisure opportunities. Centro recommends that development should be focussed in areas that are well served by Public Transport as outlined by RSS policy T.2. Centro also | This is appropriately dealt with elsewhere in the Core Strategy and the Regional Spatial Strategy. | No action. |

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| | | recommends that a Travel Plan is produced for new developments to promote sustainable transport to and from the development. | | |
| Attractive facilities Policy H.3 | 199/324 Worcs. Acute NHS | The Trust is supportive of the statement in the main Core Strategy that the Alexandra Hospital site should be protected for healthcare purposes and as noted above the boundary of the site shown on the Strategy plans should be amended to reflect the augmented hospital site/repositioned rear boundary (as per RB09 plan on page 64 of stage 3 Employment Land Review and certainly not as per the plan on pages 20 and 66 of the document which even incorporates a tongue of land forming part of the original hospital site within the area coloured pink or edged red | Note comments submitted. Accept change to the rear boundary of the site. | Amend policy accordingly. Need to make changes to the proposals map to reflect this amendment. |

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| | | designated suitable for employment purposes. | | |
| Attractive facilities SP.7 | 263/436 English Heritage | Strategic Sites – Abbey Stadium: Although the proposed policy refers to the wider context of the River Arrow (viii) and Arrow Valley Country Park ((ix) no specific mention is made of Bordesley Abbey Scheduled Monument. We object to this as an omission. An explicit reference should be made to protecting the setting of the site under (ix) as well as has regards to the archaeological potential of the area. Additionally given its current condition status and the opportunities it offers for contributing to the leisure, recreational and cultural use of the wider area suggest that the policy also seeks to given positive promotion to securing enhancements in the | Accept comments made. | Amend policy accordingly to ensure that Bordesley Abbey is incorporated within the policy to protect its setting, but also use this opportunity to create important links between the sports facilities of the Abbey Stadium and Bordesley Abbey to generate tourism for both facilities. |

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| | | management of the site, its enjoyment, interpretation and access. | | |
| Attractive facilities Policy H.3 | 264/451 CBRE on behalf of Mettis | Account should be taken of the health needs arsing from the development of sites in the Borough. A locational strategy should be developed for the provision of health facilities in accordance with areas of identified /expected growth | Officers are liaising with the Primary Care Trust on infrastructure matters in relation to health facilities. | No change. |

## *Balance between housing and employment*

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| ADRs | 017/238 (CPRE) | Considers that the rural aspect of Redditch is distinctive and agrees with inclusion of ADRs in the Green Belt (p.6, final para (PDCS)), as all ADRs are boundary locations and well | It is evidenced in previous planning documentation relating to the Borough of Redditch Local Plans 2 & 3 that the three ADRs had potential for development. It should be | Officers to consider capacities available within the ADRs to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period |

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| | | established in rural, green and environmental terms. CPRE understands that all three ADRs are no longer considered appropriate as Strategic Sites | noted that during previous plan preparation, officers were restricted to searching for appropriate and suitable land for development within the Borough's administrative boundary only. The three ADRs offered the most appropriate locations for development at that time. Changes to the planning system have allowed for cross-boundary investigation for sustainable locations for Redditch related development. WYG1 Study concluded that whilst planning up to its boundaries only, the ADRs offered suitable locations for development. However, the WYG2 Study concluded that land beyond the Borough Boundary offered more sustainable locations for development than the three ADRs. | Update Key Diagram to show the broad location of a SUE/SUEs boundary to be determined in collaboration with Bromsgrove District Council |

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| ADRs | 017/238 (CPRE) | | The WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the ADR findings in WYG1 | |
| Policy SP.6 (Woodrow Strategic Site) | 021/076 (WMRA) | SP.6 is generally in conformity with emerging WMRSS Policies SR1C (Climate Change) and CF7 (Delivering Affordable Housing) | Noted | On receipt of the WMRSS Proposed Changes, officers will check that any changes to WMRSS Policies SR1C and CF7 (if deemed necessary) are reflected appropriately within the Core Strategy |
| ADRs | 028/101 (GOWM) | 1. Examination of CS evidence base will need to show that all reasonable options have been considered<br>2. Noted that Preferred Draft Core Strategy makes reference to options in relation to the potential use of the ADR land in Redditch for future housing development | 1. Officers consider that throughout the Core Strategy consultation process, all reasonable options for the ADRs were explored:<br>- *The outcome of informal consultation used to inform the Issues & Options Paper pp.37-40, 59, 63-64* (Webheath ADR – housing only, Brockhill ADR & A435 ADR – housing and employment)<br>- *Context to the Core Strategy* | 1. None<br>2. Officers to consider capacities available within the ADRs to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period<br>Update Key Diagram to show |

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| | | | *Issues & Options document – Issue 11, pp. 15-16* (Webheath ADR – housing only, Brockhill ADR & A435 ADR – housing and employment)<br><br>*- Core Strategy Issues & Options document – Issue 11, Q15, pp.42-43* (Webheath ADR – housing only, Brockhill ADR & A435 ADR – housing and employment)<br><br>*- The outcome of Core Strategy Issues & Options Consultation – Response to Q15, pp.48-51* (Alternative approaches for ADRs to be presented in CS) | the broad location of a SUE /SUEs boundary to be determined in collaboration with Bromsgrove District Council |
| Webheath ADR | 036/115 (Smith) | 1. Webheath ADR is unsuitable for development and should be changed back to Green Belt | 1. It is evidenced in previous planning documentation relating to the Borough of Redditch Local Plans 2 & 3 that the three ADRs have potential for development.<br><br>WYG1 Study concluded that | 1, 2 & 3. Officers to consider capacities available within the ADRs to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period<br><br>Update Key Diagram to show |

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| | | | whilst planning up to its boundaries only, the ADRs offered suitable locations for development. However, the WYG2 Study concluded that land beyond the Borough Boundary offered more sustainable locations for development than the three ADRs.<br><br>When preparing the 2008/09 Strategic Housing Land Availability Assessment (SHLAA), officers were minded consider the conclusions of the WYG2 study.<br><br>The WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the ADR findings in WYG1 | the broad location of the SUE boundary to be determined in collaboration with Bromsgrove District Council |
| | | 2. Infrastructure is not | | |

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| Webheath ADR | 036/115 (Smith) | available | 2. Infrastructure exists to sustain the development of 600 dwellings (maximum) (Arup Report – Residential Development, Webheath, Redditch – December 2001) | |
| | | 3. Area serves local residents and is almost used as a 'park' space | 3. Development on the ADR would include open space provision | |

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| Webheath ADR | 041/719/720 (Bedford-Smith) | 1. Inspector's ruling for previous Western Areas proposal stated that it was not sustainable and should only be released if highway and foul drainage difficulties can be solved – which is not likely | 1. Refer to response 036/115 above | 1. Refer to action for response 036/115 above |
| | | 2. Development north/northwest of Redditch is robust, valuable and speedy when compared with development south of Redditch. Any development proposal for the Webheath ADR is likely to weaken the opportunities for railway improvements by wrecking, limiting and delaying any 'critical mass' necessary in the Arrow Valley | 2. It is anticipated that funding for improvements to the Redditch to Birmingham railway line will come forward as part of infrastructure provision associated with longer term growth options for Redditch | 2. None |
| Webheath ADR | 084/123/125 (Philpotts) | 1. Agrees with p.6, final para (PDCS), based on WYG2 that the ADR land, in particularly, Webheath, is unsuitable for future development and there are | 1, 2 & 3. Refer to response 036/115 above | 1, 2 & 3. Refer to action for response 036/115 above |

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| | | more suitable locations beyond the Borough boundary<br>2. Agrees with p.6, final para (PDCS), that the ADRs have exceptional circumstances to demonstrate their allocation as Green Belt<br>3. Para 2 p.28 ( PDCS) should be removed as it conflicts with the CS | | |
| ADRs | 095/140 (Smith) | Agrees with p.6, final para (PDCS), that the three ADRs are unsuitable for future development and there are exceptional circumstances to demonstrate their allocation as Green Belt | Refer to response 017/238 above | Refer to action for response 017/238 above |
| Brockhill ADR | 104/034/043/ 044/052/054/ 064 (RPS) | 1. Spatial strategy should meet requirements of emerging RSS by identifying land for 3300 dwellings within the | 1. Refer to response 017/238 above | 1. Refer to action for response 017/238 above |

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| | | | Redditch boundary to accommodate its requirements fully as land is available, in order for conformity with the RSS. Focus for the 3300 dwellings within the Borough should include ADR land which has already been proven to be suitable for development. The strategy is fragile and the Council should plan proactively to meet its own requirement of 3300 dwellings before deferring to other Authorities | | |
| Brockhill ADR | 104/034/043/ 044/052/054/ 064 (RPS) | 2. | (a) Seeking to designate Brockhill ADR as Green Belt is unsound as this area forms part of the North West Redditch Urban Extension, which has not been assessed within the development plan option appraisal process. The Council cannot identify this land for Green Belt without | 2(a) RBC has assessed a number of development alternatives throughout the Core Strategy consultation process, including the option put forward by the objectors as part of the Technical Paper and SA refresh. It was important that the consideration of all possible development options was not constrained. This | 2(a) Officers to consider capacities available within the ADRs and Green Belt to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period<br><br>Update Key Diagram to show the broad location of a |

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| | | full consideration of alternatives for this site. RPS objects to the use of WYG2 to substantiate the allocation of Brockhill ADR as Green Belt. RPS considers this report is flawed and cannot be relied upon as robust | would have been the case had the WYG Joint Study considered the site development boundaries of options put forward by prospective developers/landowners. It is therefore appropriate that the WYG study did not consider the specific area noted as the North West Urban Extension in isolation. During plan preparation, officers have to act on the most up to date evidence available to them – at this point in time being WYG2. However, as it further transpires the WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the ADR findings in WYG1. | SUE/SUEs boundary to be determined in collaboration with Bromsgrove District Council |
| | | 2(b) Identification of Brockhill ADR as Green Belt fails to comply with PPG2. PPG2 identifies the purposes and | 2(b) Officers consider that WYG1 assessed areas in and around Redditch for their | 2(b) Officers to consider capacities available within the ADRs and Green Belt to meet the revised RSS target of |

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| | | requirements of Green Belt. The Council cannot include land at Brockhill ADR within the Green Belt without justification against PPG2. No reference has been made to these requirements within Brockhill proposals or WYG2. RBC merely adopts the WYG approach that this land should be used to off set the loss of Green Belt. PPG2 makes no reference to requiring land to be offset as part of Green Belt purpose. This is merely an approach that seeks to pacify objections to loss of Green Belt rather than a test of its functions and purpose and is unsound. Neither WYG nor the Council has undertaken a comprehensive Green Belt review to appraise land at Brockhill ADR in the context of PPG2 para 1.5. Objection to inclusion of Brockhill ADR without testing whether land excluded from the Green Belt can meet the longer term | suitability for long term development contributions towards Redditch related growth. The WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the ADR findings in WYG1.<br><br>The EiP Panel identified all those localities where it considered that a Green Belt alteration was required or may be an appropriate response to seeking the most sustainable development patterns. Paragraph 4.18 states that once sites have been released from the Green Belt, the principle of their development has been established and it is unnecessary to test their sustainability further. This is reflected in Recommendation R8.2. | around 4000 dwellings up to 2026 and undertake a further consultation period |

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| | | needs of the Borough without further amendment of Green Belt in the future | | |
| | | 2(c) The Council is incorrect to assume that there needs to be an exceptional circumstance for the inclusion of land within the Green Belt and incorrectly refers to RRS Preferred Option para 3.9(d). It does not provide the basis for including additional areas of land within Green Belt, particularly when they have the potential to offer the most sustainable solutions to development and urban regeneration | 2(c) Refer to 2(b) above | 2(c) None. Refer to 2(b) above |
| | | 2(d) PPG2 [para 2.6] requires Green Belt boundaries to be defined in a manner that provides a degree of permanence. If Green Belt boundaries are drawn too tightly around built up areas it may not be possible to maintain the level of | 2(d) Noted and agreed. PPG2 para 2.12 states that Green Belt boundaries should relate to a time scale which extends beyond the end of the plan period which would give them the permanence for which they were intended. However, identification of safeguarded land for longer term planning | 2(d) See 2(b) above. Contact GOWM for steer on the identification of safeguarded land in and around Redditch for the period beyond 2026 |

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| | | permanence they require. | should be guided by a Regional/strategic framework. Officers consider that this has not been fully addressed in the WMRSS Phase 2 revision and that guidance should be sought on this matter. Given Redditch's tight administrative boundaries, future growth into neighbouring districts/ Green Belt is a strong possibility and officers endeavour to plan proactively for this situation | |
| Brockhill ADR | 104/034/043/ 044/052/054/ 064 (RPS) | 3. Identification of Brockhill ADR for Green Belt presents further inconsistencies with the Bromsgrove CS, which indicates this area could form part of an urban extension. Identification as Green Belt would prejudice the Bromsgrove CS | 3. Noted. Officers consider that collaborative work between RBC and BDC is essential to achieve comprehensive spatial planning across administrative boundaries. Refer to 2(b) above | 3. Refer to 2(b) above |
| Brockhill ADR | 104/034/043/ 044/052/054/ | 4. Relying on urban extensions to meet the shortfall of the Redditch housing requirement is | 4. Officers consider that the SHLAA and WYG reports presented the most appropriate evidence at the time the CS | 4. Refer to 017/238 and 2(b) above |

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| | 064 (RPS) | unsound. There are sites available within the Borough boundary that can deliver housing early within the plan period and have already been proven as appropriate. They should be a priority for delivering the RSS requirement to ensure RSS conformity | was prepared.<br><br>Refer to 017/238 and 2(b) above | |
| Brockhill ADR | 104/034/043/<br>044/052/054/<br>064 (RPS) | 5. Support for Council's approach to identification and allocation of strategic sites as consistent with PPS12. However does not currently identify the most sustainable sites for development in the context of meeting the housing requirement for Redditch | 5. Noted. Refer to 2(b) above | 5. Refer to 2(b) above |
| Brockhill ADR | 104/034/043/<br>044/052/054/<br>064 (RPS) | 6. There is no acknowledgement or strategy within Bromsgrove to plan for Redditch's shortfall thus; there is a void in the housing provision of some 1050 dwellings which | 6. Noted. Officers consider that collaborative work between RBC and BDC is essential to achieve comprehensive spatial planning across administrative boundaries | 6. RBC and BDC officers to work collaboratively to ensure comprehensive CS coverage for both districts |

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| | | is unsound | | |
| Brockhill ADR | 104/034/043/ 044/052/054/ 064 (RPS) | 7. RPS has made the Council aware of the potential of Brockhill ADR to deliver housing early in the plan period in a sustainable manner which would allow for an early lead in period to an integrated North West Urban Extension | 7. Officers acknowledge the extensive amount of material submitted by RPS regarding the North West Urban Extension and their continued enthusiasm for early housing delivery on the site. However, this does not necessarily make the North West (Brockhill) the best option for Redditch related growth. Refer to 2(b) above | 7. Refer to 2(b) above |
| Brockhill ADR | 104/034/043/ 044/052/054/ 064 (RPS) | 8. The Council should have full regard to the possibility of emerging RSS requiring additional development at Redditch and the need to find additional land to accommodate this. Sites 1 & 2 as promoted by RPS offers an opportunity to deliver additional growth under this scenario and their potential should be investigated accordingly | 8. Refer to response 017/238 above | 8. Refer to action for response 017/238 above |
| A435 ADR | 105/165 | 1. Concern over impact of high density development of | 1. If the A435 ADR was required to contribute towards | 1. None |

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| | (Hattersley) | HCA land at A435 ADR | Redditch's housing allocation then any proposal would need to comply with density criteria within CS policy | |
| | | 2. Tree screening within ADR needs to be maintained to reduce visual impact in Mappleborough Green of Claybrook Drive development. Tree planting also mitigates CO2 emissions on A435 | 2. If the A435 ADR was required to contribute towards Redditch's housing allocation then any proposal would need to address contributions to open space within the site. The tree screening within the ADR would be assessed for its contribution to this development related element | 2. None |
| | | 3. Agree that HCA land at A435 ADR should be made permanent Green Belt | 3. PPG2 para 2.12 states that Green Belt boundaries should relate to a time scale which extends beyond the end of the plan period which would give them the permanence for which they were intended. However, identification of safeguarded land for longer term planning should be guided | 3. Officers to consider capacities available within the |

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| | | | by a Regional/strategic framework. Officers consider that this has not been fully addressed in the WMRSS Phase 2 revision and that guidance should be sought on this matter. Given Redditch's tight administrative boundaries, future growth into neighbouring districts/ Green Belt is a strong possibility and officers should endeavour to plan proactively for this situation | ADRs and Green Belt to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period |
| | | 4. Considers that land at Broadacres Farm in the A435 ADR should not be changed to Green Belt as it would be ideal for low density, high quality development which would fit better with the character of Mappleborough Green as opposed to high density development proposed by HCA<br>5. Proposals from multiple land owners in A435 ADR should be treated consistently | 4 & 5. Refer to response 017/238 above. Officers consider that points 3, 4 and 5 are contradictory | |

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| | | | | 4 & 5. Refer to action for response 017/238 above |
| Webheath ADR | 107/169/232 (Rose) | Support for Webheath ADR as unsuitable for housing development and should be changed to Green Belt. Unsustainable location, inadequate roads, sewerage would have to be pumped up hill, inadequate services, protected species | Refer to response 036/115 above | Refer to action for response 036/115 above |
| A435 ADR | 114/179 (Baker) | Support for A435 ADR corridor being kept wooded and included as Green Belt | Refer to response 017/238 above | Refer to action for response 017/238 above |
| Webheath ADR | 117/184 (Randle) | 1. Support for Webheath ADR as unsuitable for housing development and should be changed to Green Belt<br>2. Would like underground electric cables in Crumpfields Lane | 1. Refer to response 036/115 above<br>2. Noted and actioned | 1. Refer to action for response 036/115 above<br>2. Forward request to infrastructure providers at an appropriate time for their consideration of this issue |

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| Webheath ADR | 118/187 (Hearnshaw/ Bagnall) | Support for Webheath ADR as unsuitable for housing development and should be changed to Green Belt | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Webheath ADR | 119/189 (Best) | Support for Webheath ADR as unsuitable for housing development and should be changed to Green Belt | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Webheath ADR | 121/192 (Barber) | Webheath ADR could be changed to Green Belt if development took place in the north east of Redditch | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Webheath ADR | 125/197 (Hemlis) | 1. Objects to development of Webheath ADR as existing infrastructure is inadequate<br>2. Supports Webheath ADR designation being changed to Green Belt | Refer to response 036/115 above | Refer to action for response 036/115 above |
| ADRs | 133/211 (Waste Policy & Sustainability, | Supports designation of ADRs to Green Belt | Refer to response 017/238 above | Refer to action for response 017/238 above |

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| | RBC) | | | |
| Webheath ADR | 134/214 (Haigh) | 1. Webheath ADR unsuitable for development due to traffic impact and environmental impact<br>2. Supports Webheath ADR designation being changed to Green Belt | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Webheath ADR | 148/256 (Rose) | Support for Webheath ADR as unsuitable for housing development and should be changed to Green Belt | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Webheath ADR | 149/257 (Rose) | Support for Webheath ADR as unsuitable for housing development and should be changed to Green Belt | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Webheath ADR | 150/260 (Stowell) | Webheath ADR is unsuitable for development and should be changed back to Green Belt | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Webheath ADR | 152/265 (Rose) | Support for Webheath ADR as unsuitable for housing development and should be changed to Green Belt | Refer to response 036/115 above | Refer to action for response 036/115 above |

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| ADRs & Webheath ADR | 158/270 (Bonham) | 1. Support for ADRs (in particular, Webheath) as unsuitable for housing development<br>2. Webheath infrastructure (drainage and highways) is inadequate to support significant additional development<br>3. Support Webheath ADR being designated as Green Belt. High amenity value, rich in flora and fauna | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Webheath ADR | 159/273 (Sullivan/ Cruxton) | Webheath ADR is unsuitable for development and should be changed back to Green Belt. Area frequently used by walkers and ramblers | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Housing | 160/274 (White) | 1. Only social housing should be developed in and around Redditch<br>2. Many homes in the district are empty and some have not been occupied since development | 1. The Strategic Housing Market Assessment for the South Housing Market Area (which includes Redditch) provides evidence on the different types and sizes of housing needed to enable the development of balanced | 1. None |

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| | | | communities within local authority areas<br><br>2. New build properties which remain empty following development are a consequence of the current economic climate. The housing allocation covers the period up to 2026. This timeframe allows for 'peaks' and 'troughs' in the housing market which averages out any under/over provision during the plan period | 2. None |
| Webheath ADR | 181/301 (Lloyd) | Objection to ADR designation being changed to Green Belt | Refer to response 036/115 above | Refer to action for response 036/115 above |
| Webheath ADR | 182/302 (Morris) | Supports the decision that Webheath ADR is not suitable for development with respect to:<br><br>1. Narrow lanes suitable for riders, walkers and cyclists but unsuitable for huge traffic increase<br><br>2. School, shopping and medical provision would be | Refer to response 036/115 above<br><br>1 & 2. Capacities of existing facilities and provision of additional facilities would need to be investigated if Webheath ADR has to be reconsidered for housing development | Refer to action for response 036/115 above |

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| | | inadequate | | |
| ADRs | 202/336 (Tetlow King) | 1. Seek the removal of a target for the delivery of housing within Bromsgrove District and seek that Redditch's housing requirements are met entirely within its administrative area | 1. It is not within the Local Authority's remit to remove the delivery of its housing allocation within Bromsgrove District; housing allocation is determined at the Regional level. Redditch is unable to accommodate its WMRSS housing allocation entirely within its administrative area due to constraints associated with Green Belt to the south west of the urban area. This has been acknowledged by the WMRA, hence the split of the housing allocation within and beyond Redditch's administrative boundary in the WMRSS Phase 2. With the absence of developable land in the Green Belt to the south west of Redditch's urban area, there is insufficient alternative land to accommodate the full WMRSS housing allocation. *'A Study of Green Belt Land & Areas of Development* | 1. None |

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| | | | *Restraint within Redditch Borough'* documents Study findings dating back to the 1960s which demonstrate the acute sensitivities of Redditch Green Belt | |
| | | 2. ADRs should be included as this would be a more sustainable option than seeking to build on land outside the Borough | 2. Noted. Inclusion of the ADRs for development would not provide sufficient additional supply to meet the WMRSS housing allocation for Redditch. Refer to response 017/238 above | 2. Refer to action for response 017/238 above |
| Webheath ADR | 206/341 (Gartside) | Objection to any potential development at Webheath ADR with respect to:<br>1. Wealth of wildlife in the area<br>2. Road system from Callow Hill to Webheath is unsuitable to accommodate increased traffic. Increase in road would impact on wildlife and hedgerows | Refer to response 036/115 above | Refer to action for response 036/115 above |

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| | | 3. Support for Webheath ADR being changed back to Green Belt | | |
| ADRs | 262/417 (HCA) | Premature and inappropriate to place ADR land in the Green Belt at this time. The designation of this land as Green Belt would establish a significant policy objection and could promote unsustainable patterns of development. Suggest that key diagram is modified so that ADR is not in Green Belt | Refer to response 017/238 above | Refer to action for response 017/238 above |

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| Webheath ADR | 267/573/579/ 581/588/767 (Barton Willmore) | 1. Consider that the proposed development is in a suitable location and offers an opportunity to create a sustainable urban extension to Redditch town. ADR sites should be identified as strategic sites for development capable of meeting the Borough's own needs within their administrative boundary. Council's decision not to include ADR as suitable sites for development is flawed. Do not consider that the inclusion of existing ADRs within the Green Belt will assist in achieving overall objectives of urban regeneration | 1. Refer to response 104/ 2(a) above | 1. Officers to consider capacities available within the ADRs and Green Belt to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period |
| Webheath ADR | 267/573/579/ 581/588/767 (Barton Willmore) | 2. Evidence exists that the Council and two previous Local Plan Inspectors consider that development of the Webheath ADR is acceptable in principle and have acknowledged the site | 2. Refer to response 017/238 above | 2. Refer to action for response 017/238 above |

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| | | as in a sustainable location. There has been no change in planning legislation of planning policy (PPG3 replaced by PPS3) which would result in a completely different emerging view of the sustainability of this site for development | | |
| Webheath ADR | 267/573/579/ 581/588/767 (Barton Willmore) | 3. There is no landscape and visual evidence to back up the claim that the site is of a high landscape value which is contrary to the Green Belt report which states that development of the site would have no serious effect on the landscape. Following the WYG suggestion to remove ADR sites and propose their reinstatement as Green belt, respondent commissioned a Landscape and Visual Appraisal of Webheath ADR and a comparative assessment of Bordesley Park and | 3. Whilst Landscape and Visual Appraisal of sites is considered important, Officers consider that WYG1 assessed areas in and around Redditch for their suitability for long term development contributions towards Redditch related growth. The WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the ADR findings in WYG1.<br><br>The EiP Panel identified all those localities where it considered that a Green Belt | 3. Refer to (Barton Willmore) 1 above |

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| | | Foxlydiate Woods. In summary, Webheath ADR is suitable for development and there would be no long-term landscape or visual impacts as a result of development. Bordesley Park is unacceptable for development in landscape and visual terms due to its breech of the landscape boundaries of Redditch and its extensive and harmful impact on the Green Belt. Foxlydiate Wood would create a significant and harmful visual impact due to its elevated location and lack of boundary definition | alteration was required or may be an appropriate response to seeking the most sustainable development patterns. Paragraph 4.18 states that once sites have been released from the Green Belt, the principle of their development has been established and it is unnecessary to test their sustainability further. This is reflected in Recommendation R8.2.<br><br>Refer to (Barton Willmore) 1 above | |
| Webheath ADR | 267/573/579/<br><br>581/588/767 (Barton Willmore) | 4. The findings of the Council's Green Belt report are entirely contradictory to the WYG report. The Green Belt report demonstrates that development of the Webheath ADR is appropriate to meet the development requirements | 4. *'A Study of Green Belt Land & Areas of Development Restraint within Redditch Borough'* documents Study findings dating back to the 1960s which demonstrate the acute sensitivities of Redditch Green Belt. Officers consider that WYG1 assessed areas in | 4. Refer to (Barton Willmore) 1 above |

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| | | in Redditch | and around Redditch for their suitability for long term development contributions towards Redditch related growth. The WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the ADR findings in WYG1.<br><br>The EiP Panel identified all those localities where it considered that a Green Belt alteration was required or may be an appropriate response to seeking the most sustainable development patterns. Paragraph 4.18 states that once sites have been released from the Green Belt, the principle of their development has been established and it is unnecessary to test their sustainability further. This is reflected in Recommendation R8.2. | |

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| | | | Refer to (Barton Willmore) 1 above | |
| Webheath ADR | 267/573/579/ 581/588/767 (Barton Willmore) | 5. PPG2 advises that Green Belt boundaries should not be drawn tightly around urban areas as it would be difficult to maintain the degree of permanence that Green Belt should have. It is likely that Green Belt boundaries may need to be reviewed in the near future as part of future housing delivery proposals | 5. PPG2 para 2.12 states that Green Belt boundaries should relate to a time scale which extends beyond the end of the plan period which would give them the permanence for which they were intended. However, identification of safeguarded land for longer term planning should be guided by a Regional/strategic framework. Officers consider that this has not been fully addressed in the WMRSS Phase 2 revision and that guidance should be sought on this matter. Given Redditch's tight administrative boundaries, future growth into neighbouring districts/ Green Belt is a strong possibility and officers should endeavour to plan proactively for this situation | 5. See (Barton Willmore) 1 above. Contact GOWM for steer on the identification of safeguarded land in and around Redditch for the period beyond 2026 |
| Webheath ADR | 267/573/579/ 581/588/767 | 6. WYG does not provide evidence to demonstrate | See (Barton Willmore) 1 above | See (Barton Willmore) 1 above |

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| | (Barton Willmore) | exceptional circumstances for the Webheath ADR to be put back into Green Belt | | |
| Webheath ADR | 267/573/579/ 581/588/767 (Barton Willmore) | 7. Given the Council's failure to identify sufficient land for housing, the proposed identification of the land at Webheath as Green Belt would unduly constrain the development of a suitable housing site which could be used to meet the identified housing requirement | 7. Refer to response 017/238 above. Refer to (Barton Willmore) 1 above | 7. Refer to action for response 017/238 above. Refer to (Barton Willmore) 1 above |
| | 267/587 (Barton Willmore) | 8. DPD is not sufficiently flexible to deal with any changes i.e. housing figures from an emerging RSS. DPD fails to meet the housing requirements of the emerging RSS when there are sufficient, suitable, available and deliverable sites within the Borough | 8. Refer to response 017/238 above<br><br>PPS12 paragraph 4.10 requires the Borough Council to show how the CS objectives will be achieved under different scenarios which may be necessary in circumstances where provision is uncertain. The simplicity of the Core Strategy for Redditch means | 8. Refer to action for response 017/238 above |

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| | | | that there are no significant uncertainties regarding provision therefore flexibility should be limited. Indeed, the objectives have been purposely drafted to be long-term and flexible under changing circumstances. In terms of the achievement of the objectives it is considered that the broad nature of the Strategic Site policies where detail is supplemented through other DPDs/SPDs provides sufficient flexibility | |
| Webheath ADR | 267/593(Barton Willmore) | Seek to address the perceived disadvantages of the Webheath ADR stated in WYG2 as well as comparing them against those identified for Bordesley Park and Foxlydiate:<br>9. *Poor road network* – WYG2 claims capacity of ADR reduced from 600 to 450 dwellings due to 150 already constructed | 9. Officers consider that this is an error in WYG2 but also consider that a revised traffic | 9. Seek to revise traffic assessment report for the |

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| | | | assessment for the Webheath area would be beneficial to update the Arup (Dec 2001) report | Webheath area |
| | | 10. *Distant from Town Centre/ poor communications/ not well linked to cycleways and footpath systems/ distant from employment sites* – WYG2 contradicts the 'Redditch Green Belt Study' which states that Webheath ADR development would be consistent with PPG2 advice and development would be relatively harmonious with existing development. An accessibility study undertaken in January 2009 concludes that Webheath ADR scores positively and therefore Webheath ADR should be scored the same as Bordesley park in WYG2 | 10. RBC has assessed a number of development alternatives throughout the Core Strategy consultation process, as part of the Technical Paper and SA refresh. During plan preparation, officers have to act on the most up to date evidence available to them – at this point in time, being WYG2. However, as it further transpires the WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the ADR findings in WYG1 | 10. Officers to consider capacities available within the ADRs and Green Belt to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period<br><br>Update Key Diagram to show the broad location of a SUE/SUEs boundary to be determined in collaboration with Bromsgrove District Council |

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| | | 11. *Difficult foul drainage* – WYG1 does not list this as a potential constraint for Foxlydiate despite para 5.50 confirming the similarities with Webheath ADR as both sites would require the pumping of foul drainage to Spernal STW. Discussions have been held with Severn Trent Water and STW has agreed to the principle of connecting Webheath ADR to the public drainage system. STW has also agreed to outline options proposed for mitigating any potential impact of the new development on the existing sewage system. It is not considered that there are any 'difficult foul drainage' problems associated with the development of the Webheath ADR | 11. Officers acknowledge the inconsistencies in WYG2. However, officers consider that WYG1 highlighted constraints that may not be insurmountable but would have high costs associated with them. It is agreed that pumping to Spernal is possible however, alternative locations investigated by WYG offer more cost effective options and more sustainable approaches. WYG1 also acknowledges that areas 3 & 4 (Webheath ADR & Foxlydiate) would require sewerage pumping | 11. See (Barton Willmore) 1 above |

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| | | 12. *Attractive Landscape* – WYG2 concludes that Webheath ADR is an 'attractive landscape' with no analysis of what constitutes this and no detailed appraisal to back this up. There is an inconsistency and unfairness with the approach to assessing Webheath ADR, Foxlydiate and Bordesley Park. Barton Willmore have commissioned an independent study which concludes that Webheath ADR would be more suitable in terms of landscape and visual impact than Foxlydiate or Bordesley Park | 12. See (Barton Willmore) 3 above | 12. See (Barton Willmore) 3 above |
| | | 13. Other inconsistencies between Webheath ADR, Foxlydiate and Bordesley Park exist i.e. *Outside* | 13. Officers acknowledge the inconsistencies in WYG2. See (Barton Willmore) 1 above | 13. See (Barton Willmore) 1 above |

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| | | *Landscape Protection Area & Area of Great Landscape Value, Ridgeline site but not prominent, Natural extension to urban form* | | |

## *Climate change and sustainability*

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| Policy SP.3 and Policy BE.1 | 005/483 | Renewable energy provision and sustainable building requirements created in bullet point (v) of SP.3 and point (ii) of BE.1 are contrary to national guidance and would constrain residential development in the Borough. A lack of any credible and robust evidence base on which policies have been | It is firmly established at national level that new development will need to be more sustainable. The ability to supply renewable energy is central to this. With regard to the requirement for renewable energy production in new development (point v of SP. 3), this is set out in the WMRSS | Amend policy in line with WMRSS. |

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| | | based (as required by PPS 1 Supplement). | Phase II Revision, which requires developments of 10 or more to supply 10% of their energy from a sustainable source. As the WMRSS has not yet been adopted Officers are still considering whether this requirement will still remain as part of the Core Strategy. As such this comment will be taken on-board. It is also part of national planning guidance (Supplement to PPS 1 and PPS 22) that renewable energy is produced. Therefore the need to incorporate sufficient renewable energy production facilities in new development is appropriate to achieve these national goals.<br><br>It is unclear how Bullet Point ii of BE.1 would constrain residential development as this is only applicable to offices and other non-domestic buildings. | |

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| Policy BE.1 | 042/ 470 | <u>Point one</u><br>Reference to regional Standards in Point (i) should be removed as it is unlikely that the Government will allow a timetable that is out of line with their own. | The timescale in the Core Strategy is in accordance with regional and national targets. | None |
| | | <u>Point two</u><br>Point (ii) and (iii) refers to the need to incorporate renewable or low carbon energy equipment within development to meet at least 10% of the residual energy demand. This should only apply where viable (in line with PPS 22) and therefore policy should be reworded to reflect this approach. | The requirement for new developments (over 5 units or 1,000 square meters) to supply 10% of their energy supply via sustainable sources is requested by the WMRSS. Redditch Borough Council has amended this to 5 dwellings due to the limited capacity of sites that are over 10 dwellings in the Borough. | None |
| | | <u>Point three</u><br>Point (iv) within the Policy requires a sustainability statement to be submitted with | The requirement for a Sustainability Statement to be produced is detailed within the | Amend policy in line with WMRSS. |

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| | | planning applications. The supplement to PPS1 states that specific and stand alone statements of this nature are not required where the requisite information can be incorporated in a submitted Design and Access Statement or part of an Environmental Statement. | WMRSS Phase Two Revision; the WMRSS then requires that these standards are detailed in Development Plan Documents. The WMRSS is not yet adopted and as such Redditch Officers are still considering whether this requirement should still remain within the Core Strategy. | |
| | | <u>Point four</u><br>Reference is made to the sustainability checklist; it is not clear how the checklist relates or indeed duplicates the Code for Sustainable Homes. The Code is a more appropriate benchmark. | Although both tools consider aspects of sustainability they should be used in isolation. The Code for Sustainable Homes presently only considers individual houses, whereas the West Midlands Sustainability Checklist looks at an entire development and also considers issues that are outside of the remit of the Code. Therefore in order for Redditch Borough to deliver | None |

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| | | | the best developments possible it is best practice for developers to consider their developments against the Checklist. The Code is a mandatory standard which carries significant weight, whereas the checklist is used as guidance and therefore given less weight. For this reason Officers consider both tools useful and best practice when considering how sustainable a development is. | |
| Policy BE.1 | 027/475 | Policy BE.1 should include requirements relating to transport. In particular, for developments to be accessible by sustainable modes of transport and for developers to provide, and implement Travel Plans to encourage the use of these sustainable modes. | It is considered that it would be appropriate to include reference to sustainable modes of transport in this policy, as transport is a cross cutting theme of the Core Strategy. The policies contained within the Core Strategy detail a strategic aspiration for the Borough, with detail on how the | Incorporate the text *"development requirements will be met in accessible locations and take account of the accessibility needs between uses"* as a principle in the Climate Change Policy. |

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| | | | Vision for Redditch Borough can be achieved by 2026. The policies aim to steer future development in the Borough in the most sustainable way.<br><br>The need for new developments to provide travel plans is considered appropriate as a delivery tool within the Core Strategy and can be incorporated into the 'Sustainable Travel' Policy. | |
| BE. 1 | 049/ 737a | Policy repeats RSS Policy. Policy should be amended to remove sections which repeat regional planning policy. | Comment noted. A number of policies within the WMRSS require LDFs to incorporate some of the standards that are set within the WMRSS. For example Policy SR1 Climate Change states that *"Regional and local authorities, agencies and others shall include policies and proposals in their plans, strategies and* | Amend policy in line with WMRSS. |

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| | | | *programmes to…"* The WMRSS Phase Two Revision has not yet been adopted and therefore Officers are still considering whether some of the criteria within the Core Strategy will remain. | |
| BE 1 (i) | 049/ 737b | This point need to be re-worded as the Code for Sustainable Homes does not contain regional standards. | This sentence has been incorrectly phased and should have read *"new residential developments must meet the current Code for Sustainable Homes standards contained within the RSS*." | Amend sentence to read *"new residential developments must meet the current Code for Sustainable Homes standards contained within the RSS*." |
| BE. 1 | 049/737c | The term 'climate-proofed' is now being phased out; 'climate resilient' has become a more acceptable way of describing this approach. | 'Climate resilient' will replace the term 'climate-proofed' where used. | Replace term climate-proofed with climate resilient. |
| BE. 1 | 049/ 737d | There appears to be contradiction in wording in Policy, in particular the introductory text is ambiguous | It is considered that the standards laid out in the policy are the optimum possible standards bearing in mind | Amend policy in line with WMRSS. |

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| | | and suggests levels of sustainability that cannot be achieved by requirements set in policy (optimum standards would be higher than those in policy). | other issues that must be considered when planning for new developments and are realistically achievable in Redditch Borough. | |
| BE.1 | 049/ 737e | Item (ii) should be expressed in terms of BREEAM terminology, rather than improvements over Building Regulations. | This text is taken from the requirements set out in the WMRSS Phase Two Revision Preferred Option (December 2007) Policy SR3 Sustainable Design and Construction point C. the WMRSS has not yet been adopted and therefore Officers are still considering whether this requirement will remain in the Core Strategy. Please see response to comment 049/ 737a which requested text that repeats regional planning policy to be removed. | Please see action for In line with response 049/ 737a. |
| BE. 1 | 049/ 737f | Text in point (vi) should be | It is considered appropriate | Within the Natural Environment |

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| | | amended to include the word 'landscape' and the words 'historic environmental and heritage assets' and the word 'built' removed to read *"…manage and enhance landscape, natural and historic environmental and heritage assets…"* However this point of policy would be more suited to an environmental policy. Although linking and creating new habitats to aid species dispersal is welcomed it is questioned why renewable energy developments have been singled out for more stringent environmental protection. | that this point of the policy be included within the Natural Environment Policy.<br><br>It is considered that large scale renewable energy projects can cause harm to the environment in terms of damage to habitats and therefore there is a need to considered environmental protection when considering large scale renewable energy projects. In particular there are many distinctive aspects of Redditch Borough that would be under threat with regard to renewable energy projects for example the abundance of species and biodiversity that is present in the many trees and hedge lined highways that are in Redditch. | Policy include the text *"…manage and enhance landscape, natural and historic environmental and heritage assets…"* |
| BE. 1 | 049/ 737g | Wording in relation to renewables is negative both in | It is considered that the wording in these paragraphs is | None. |

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| | | item (vi) and final paragraph.<br><br>It is questioned why the final paragraph does not have a number and if it is linked to point (vi). | not unduly negative and therefore the wording can remain.<br><br>The final paragraph was not given a bullet point as it was considered separate to other points as it relates only to a limited number of development schemes that would affect designated sites. | None. |
| | O49/ 737h | The table referred to at the end of the end of page 52 – the Code for Sustainable Homes standards has not been included. | This table should have been included following the Reasoned Justification. The supplementary table will be included within the Submission version of the Core Strategy. | Ensure supplementary information is included within the Submission version of the Core Strategy. |
| | 049/737i | Include a statement to encourage methods to improve energy efficiency of existing historic properties without compromising conservation issues. | See comments to 049/736d | See action to 049/736d. |

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| | 049/ 721 | County Council has/ will produce a series of Natural Resource Papers on Planning for Water, Renewable Energy, Climate Change, Green Infrastructure and Soils. | The documents detailed have and will inform the Policies within the Core Strategy. | Ensure all documents produced by County Council are considered in the background technical papers which in turn informs the content of the policies. |
| Policy BE. 1 | 088/ 542a | Support for Policy. | Support noted. | None. |
| Policy BE. 1 | 088/ 542b | Code for Sustainable Homes requirements should be in line with national standards not regional standards. As it is considered that specifics about its application are still being debated and keeping in line with national standards does not risk the policy becoming out of date. | It is considered that there is evidence available to show that the targets set regionally can be achieved; this evidence would be in the form of background documents to the Regional Spatial Strategy. Therefore if there is evidence to show these targets can be delivered there is no reason for Redditch to diverge from them. Regional targets are also more distinctive than national targets and therefore more relevant to Redditch. | Amend policy in line with WMRSS. |

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| Policy BE.1 | 088/ 542c | It is not clear where point (ii) originates from. Would support instead reference to BREEAM standards. | This text is taken from the requirements set out in the WMRSS Phase Two Revision Preferred Option (December 2007) Policy SR3 Sustainable Design and Construction point C. the WMRSS has not yet been adopted and therefore Redditch Officers are still considering whether the requirements detailed in this Policy would still be incorporated into the Core Strategy. Please see response to comment 049/ 737a which requested text that repeats regional planning policy to be removed. | Amend policy in line with WMRSS. |
| Policy BE. 1 | 088/ 542d | It is disappointing that a higher target than 10% (energy requirements be obtained from renewable energy for new developments). The policy should be more positively | This standard reflects the standard requested in the WMRSS. However Officers consider that it is more appropriate to focus on new developments reaching high | None. |

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| | | worded to promote higher standards where achievable. | levels of the Code for Sustainable Homes rather than renewable energy generation in isolation as the Code encompasses a wider range of sustainability benefits. | |
| Policy BE. 1 | 088/ 542e | Support the requirement for a sustainability statement and use of the WM Sustainability Checklist; however this requirement would better be located in the Sustainability Principles Policy. | The Sustainability Principles Policy no longer exists in its present form and therefore it is considered that the requirement for a Sustainability Statement is best located within the Climate Change Policy. | Amend policy in line with WMRSS. |
| Policy BE. 1 | 088/542f | Welcome the requirement for particular schemes involving the production of renewable energy to enhance, link and extend natural habitats. Information on what schemes would be expected to do could be provided in the justification to add clarity. | It would be too prescriptive to detail what each individual scheme would be required to do to address this issue as every scheme is different therefore it would not be appropriate to detail these measures within this policy. | None. |

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| Policy BE. 1 | 088/542g | Support the requirement for large-scale renewable energy generation applications to ensure nationally designated sites are not compromised. However, this requirement should be expanded to include all statutory protected species. Developers should provide evidence that their proposals would not result in unacceptable, unmitigated or uncompromised impacts on the natural environment. | It is considered that the protection of statutory protected species are already sufficiently protected by national legislation as stated in Planning Policy Statement 9 page 7 which states that "*many individual wildlife species receive statutory protection under a range of legislative provisions and specific policies in respect of these species should not be included in local development documents"* .<br><br>The Local Validation Checklist requires that an Environmental Impact Assessment is submitted alongside relevant applications. | None. |
| Policy BE. 1 | 104/ 059a | Policy is currently unsound in its approach, as it is not consistent with national policy, | It is considered that the Policy is in line with regional and national standards. Officers are | Amend policy in line with WMRSS. |

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| | | nor is it justified by robust and credible evidence. Would refer the Council to the letter distributed by the Home Builders Federation illustrating the manner in which energy efficient targets should be applied to new homes in relation to PPS 1 and PPS 22. | still considering the content of this policy and therefore this comment will be taken on-board. | |
| Policy BE. 1 | 202/ 331 | Support for Policy. It should be acknowledged that RSL developments must already meet Level 3 of the Code for Sustainable Homes. | Support noted. | None. |
| Policy BE. 1 | 208/ 343 | It will be important to provide some flexibility within Criterion iii) to deal with circumstances where it will not be appropriate, or viable to achieve the 10% renewable energy requirement. | It would be the developers/ applicants responsibility to demonstrate why they cannot achieve the requirement set, it would then be decided by the Development Control Officer whether these reasons were considered fair and reasonable. | None. |

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| | | Paragraph 4.14 of the Companion Guide to PPS 22 indicates that such policies should not be inflexible (not all technologies are appropriate on all sites and locational constraints should be borne in mind) and not place undue burdens on developers (local authorities should be mindful of the level of development pressure in their area in setting generation targets). | It is considered that the targets that are set by the Core Strategy are fair and reasoned and are appropriate in Redditch Borough. | Amend policy in line with WMRSS. |
| Policy BE. 1 | 267/ 582a | Point (iii) should be re-worded to make reference to securing a 10% reduction in energy usage rather than requiring a blanket 10% renewable energy provision across all qualifying sites (in line with the requirement in SP. 3 to reduce energy use). | The requirement in paragraph (iii) requests 10% of energy requirements to be supplied from renewable sources is based on the requirement set out in the West Midlands Regional Spatial Strategy Phase II Review. The RSS requires this aspect of the Policy to be included. However the WMRSS is not yet adopted | Amend policy in line with WMRSS. |

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| | | | and therefore Officers are still considering the content of the Core Strategy Policy. | |
| | | This is also listed as a requirement rather than a target and there is no flexibility built into the policy for proposals where it may not be viable for design related reasons, appropriate to provide renewable energy provision (PPS 1 Supplement Para 26 (i) requires planning authorities to set a target). | It is considered that the 10% requirement is a tried a tested percentage for new developments to meet for developments over 5 residential units (or 1,000 square meters). If it is unviable for developments to meet this requirement for specific reasons the responsibility will be on them to demonstrate why this requirement would be unachievable. | Include in Policy the following statement, *"If it is unviable for developments to meet this requirement for specific reasons the responsibility will be on them to demonstrate why this requirement would be unachievable."* |
| Policy BE. 1 | 267/ 582b | With regard to points (iii) and (iv) the emerging regional policy sets a qualifying threshold of 10 residential dwellings, however the Policy proposes to reduce this to 5 dwellings on the basis that the | The majority of strategic sites detailed within the Preferred Draft Core Strategy are for a mix of uses for example retail, employment and leisure in which case the reduction from 10 dwellings to 5 dwellings | None. |

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| | | majority of sites in Redditch are small sites below 10 dwellings. This is disagreed particularly given the number of 'strategic sites' identified in the Core Strategy. | threshold would not apply. The only strategic site that is for 100% residential is Woodrow Strategic Site which is considered capable of accommodating between 77 – 129 dwellings and therefore would be over the 10 dwelling and 5 dwellings threshold. All other housing sites in the Borough (identified through the SHLAA) are considerably and consistently smaller and therefore justify a 5 dwelling threshold approach. | |
| | | An evidence base is required to demonstrate local feasibility and potential for renewable and low carbon technologies. There appears to be no work undertaken to show potential impacts of a change to threshold over and above that being tested at regional level. Therefore qualifying thresholds | A Climate Change Technical Paper will be produced which demonstrates the evidence for and the feasibility of the requirements within the policy. A number of targets are required to be included in the Policy as part of the RSS, feasibility and potential of these targets for the region is | None. |

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| | | should be amended to fit with regional targets. | contained within the RSS evidence base. | |
| Policy BE.1 (vi) | 102/ 151 | Should read '*natural and historic environmental and heritage assets…'* | Agreed. | Amend wording of Policy BE.1 Point (vi) to *'natural and historic environmental and heritage assets…'* |
| Policy BE.1 | 264/ 447 | With regard to point (iii) it is suggested that the proportion of renewable energy should depend on the individual proposals, as per representations made to the Issues and Options Document. | The requirement in paragraph (iii) requests 10% of energy requirements to be supplied from renewable sources is based on the requirement set out in the West Midlands Regional Spatial Strategy Phase II Review. The RSS requires this aspect of the Policy to be included. The WMRSS has not yet been adopted and therefore Officers are still considering the content of the Core Strategy Policy. | Amend policy in line with WMRSS. |
| Sustainable Homes | 028/ 107 | Support that Core Strategy is addressing the issue of | Support noted. | None. |

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| | | sustainable homes. | | |
| Better Environment for Today and Tomorrow | 049/ 735 | Text should be amended in the introductory paragraph to the 'Better environment for today and tomorrow section' to recognise the importance of the historic environment, not just natural environment. | The 'Better environment for today and tomorrow' chapter is no longer in this format. The Core Strategy is to be split into new strategy areas which will have a very brief introduction to the strategy. Therefore the suggestion cannot be applied in its current form but will be incorporated into the new section. | Ensure the new 'Green' Strategy incorporates the importance of the historic environment. |
| | | The chapter should also make it explicit that biodiversity includes geodiversity. | Comment noted. Where biodiversity is referred to in the Core Strategy, a definition of geodiversity will be included. | Sentence to be amended to *"For the purposes of Redditch Borough's Local Development Framework, the Natural Environment is defined as trees, wildlife corridors, rivers, sites of national, regional or local importance and other sites of biodiversity and Geodiversity importance. Geodiversity refers to the non-biological aspects of nature* |

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| | | | | *including rocks and minerals."* |
| | | The introduction to the chapter is too exclusive and specific with 'trees' rather than fauna more generally and 'wildlife corridors' but no wildlife per se. | Comment noted. Text will be amended to ensure that a general more strategic approach to fauna is made with specific references to Redditch's distinctive features to follow. | The first paragraph will be amended to read *"Natural Environment is defined as fauna including trees…"* |
| | | Question whether mitigating and adapting to the effects of climate change can be achieved solely through the application of sustainable design and construction principles, as is currently stated in the second introductory paragraph. | It is considered that there are a range of policies that seek to mitigate and adapt to the effects of climate change within the Core Strategy, as climate change is a cross-cutting theme of the Core Strategy, however with regard to this specific section there is one policy being referred to that deal with the contribution the built environment can make to this theme, therefore the reference is accurate. | None. |

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| | | Third paragraph in the introductory section could be expanded upon to reflect the need to maintain and foster local distinctiveness rather than just stating that trees make Redditch distinctive. | It is considered that it is a general approach of the Core Strategy to maintain and foster local distinctiveness and this is explicitly mentioned elsewhere in the Core Strategy. | None. |
| | | Text should be amended in the third paragraph to include reference to the historic environment, as such "natural *and historic* environment … risks to the *historic and* natural environment" | The introductory chapter does not exist in its current form; however, where it is considered appropriate the importance of the historic environment as part of the built environment will be amended. | Text will be amended to show the importance of the historic environment as part of the built environment. "Natural *and historic* environment … risks to the *historic and* natural environment. |
| | | It may be important to reflect in the strategy that the present distribution of settlements and farmsteads in the borough is directly related to its historic settlement pattern and its role as a former royal forest. | It is considered that this information is sufficiently detailed within the Landscape Character Assessment and therefore does not need repeating in the Core Strategy. | None. |
| | | Reference should be made that | Reference is already made in | Insert reference into Policy |

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| | | historic landscape boundaries should be respected and promoted within any new development and development proposals should take account of information contained within County produced documents (list provided). | Policy BE.3 'Landscape Character' for '*proposals for new development … to demonstrate that the Borough's distinctive landscape is protected, enhanced or restored and that they are informed by, and sympathetic to, the landscape character of the area in which they are proposed to take place.'* However an additional sentence can be inserted which refers to the need to respect and promote historic landscape boundaries. The principle of BE. 3 will be retained although this is now part of the 'Natural Environment' Policy. | BE.3 regarding the need to respect and promote historic landscape boundaries through proposals for new development. |
| | | The first part of paragraph four of the introduction to the Better Environment chapter introduction repeats | Comment noted. A shorter more general reference to sites with designations will be made. | Amend text in paragraph four to make a more general reference to designated sites within Redditch Borough. |

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| | | information in the spatial portrait regarding designations and could be removed or amended. | | |
| Climate Change | 049/ 736a | The focus of the introduction to the policy on climate change is predominately on mitigation through renewable energy, not adaptation, whilst it is accepted that other policies i.e. flood risk make reference to adaptation measures these should also be brought forward within the climate change policy. | It is considered that the Core Strategy incorporates, as much as possible the need for adaptation methods to climate change, for example the use of SUDS is required. However the Core Strategy only has a limited role with regard to adaptation as the Core Strategy seeks to ensure development mitigates climate change rather than adapt to it. | None. |
| | 049/736b | Documents produced by County Council (list provided) should be used to inform the preparation of the Core Strategy. | All documents produced by the County Council have been considered and incorporated into the Core Strategy where appropriate. Documents and studies that emerge before submission of the Core | None. |

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| | | | Strategy will also be incorporated where appropriate. | |
| | 049/736c | Within the policies related to the natural environment (Trees, Landscape character) reference should be made of the need to mitigate and adapt for climate change in line with the principles of green infrastructure planning. | It is considered that reference should be referred to in the introduction to the Natural Environment Policy, as a number of the principles outlined in this Policy work towards mitigating and adapting to the effects of climate change. | Text to be inserted in the introduction to the Natural Environment Policy which refers to the Policy adapting and mitigating to the effect of climate change. Text to read, "*A number of aspects of the natural environment can help to mitigate and adapt to the effects of climate change.*" |
| | 049/736d | Climate change issue should not be discussed only in terms of new development, but also should discuss existing development. | Retrofitting existing buildings is a very important issue; however the Core Strategy is very limited in what it can do in terms of existing buildings. It is considered that retrofitting is dealt with by other departments within the Council. Grants are available for the over 60's, private landlords and certain properties in the Town Centre | None |

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| | | | area which are 'hard to treat' for insulation measures. Redditch Borough Council will also be insulating all Council owned properties to current building regulations standard by 2012. | |
| Sustainability | 101/ 144a | Redditch should be self-sustaining by 2026. It should produce it's own energy and food and use the River Arrow for watermill power. | This is an aspirational idea, however is unrealistic for the Core Strategy to deliver. Targets that are contained within the Core Strategy should be deliverable and are considered as such. | None. |
| | 101/144b | Shops that provide sale points for local good should have subsidized rents or rates. | The Core Strategy cannot control rents and rates for local businesses, this is a private function dictated by the market. | None. |
| | 101/144c | There should be no more housing built as land should be used for food production. | There is an established need for housing within Redditch to ensure that everyone has access to a home in an area they desire. The housing | None. |

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| | | | allocation for Redditch is based on the natural population projection and therefore on this basis is considered a sustainable approach. Housing figures for Redditch Borough are dictated by the West Midlands Regional Spatial Strategy; is currently still be prepared and therefore the final housing figures have not yet been decided, however Redditch Borough will have to accept some growth to ensure the natural population growth is catered for up to 2026. | |
| | | Industrial sites should have solar panels and wind power. | There was a requirement within the Core Strategy to ensure industrial development over 1000 square meters provide a proportion of their energy needs from renewable sources. However Officers are still considering whether this | Amend policy in line with WMRSS. |

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| | | | requirement will remain within the final Core Strategy. | |
| | | The only housing built should be bungalows or sheltered housing for older people and should be within walking distance of shops and services. | Planning Policy Statement 3 'Housing' requires that a mix of size and type of housing is provided to ensure that all needs of the community are considered. With regard to location the Core Strategy requires that development is directed to the most sustainable locations. | None |
| | 104/ 059b | Paragraph i) of the policy aligns itself to the Code for Sustainable Homes regional timescale but the regional policy is unsound, the Government Office response has made that clear. | It is considered that regional targets should be supported by studies undertaken at the regional level that should deliverability. With regard to the deliverability within Redditch Borough the Technical Paper 'Green Strategy', demonstrates that the targets that are set regionally are deliverable within | None. |

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| | | Policy CF. 1 repeats the intention of regional policy and is therefore unsound in itself as spatial policies are not suppose to repeat regional or national policies. This does not add any additional value or local distinctiveness to the regional policy. | Redditch Borough.<br><br>It is considered that the Core Strategy does not unduly repeat regional or national planning policy and that requirements are only repeated when the RSS states this must be done. | None. |
| | 104/ 059c | Paragraph i) and iii) are conflicting. PPS 1 on Climate Change specifies that the requirements for energy efficiency should be included within references to the Code for Sustainable Homes as inferred through paragraph i). This is because Merton style policies are not appropriate where a Council uses the Code for Sustainable Homes as they are conflicting. As the Code | It is considered that national planning policy does not prohibit the use of both the Code for Sustainable Homes standard and a Merton style policy simultaneously. Both methods have overlapping but different objectives. Both aim to reduce carbon emissions, however a renewable target reduces the UKs reliance on fossil fuel based energy, whereas the Code ensures that | None. |

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| | | advances bullet point iii) will be out of date | each new dwellings is as sustainable as possible. Therefore it is considered that it is appropriate to use both methods of sustainable. It is considered that Level 6 of the Code for Sustainable Homes would be more efficient with regard to energy that requiring 10% of energy demand to be supplied from renewables, however supplying renewable energy allows national energy supply targets to be achieved. | |
| | 104/ 059d | It is a requirement of PPS 1: Planning for Climate Change that the local authority test its requirements against securing the expected supply and pace of housing should in the housing trajectory in accordance with paragraph 33. it is also a requirement of the local authority not the | It is considered that comment is made with full regard to paragraph 33 of the PPS 1 Supplement the points of this paragraph will be answer respectively.<br><br>*"Planning Authorities should:*<br>*– ensure what is proposed is evidence-based and viable,* | None. |

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| | | development industry to ensure what is proposed is evidence based and viable having regard to the overall costs of bringing sites to the market. | *having regard to the overall costs of bringing sites to the market (including the costs of any necessary supporting infrastructure) and the need to avoid any adverse impact on the development needs of communities;"*<br>All evidence relating to the viability of targets relating to sustainable buildings will be contained within the Technical Paper 'Green Strategy'. In relation to the costs related to bringing forward housing sites, economic viability assessments are being conducted as part of the Strategic Housing Land Availability Assessment. In terms of infrastructure costs, research has been conducted which is being developed as part of the evidence for the Local Development Framework. | |

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| | | | *– "in the case of housing development and when setting development area or site-specific expectations, demonstrate that the proposed approach is consistent with securing the expected supply and pace of housing development shown in the housing trajectory required by PPS3, and does not inhibit the provision of affordable housing; and"*<br>The Core Strategy is not setting area or site specific targets for development areas. It is considered that the targets that have been set can be accommodated within the expected supply and pace of housing development within the Borough; please see the Technical Paper 'Green Strategy' for more information.<br>*– set out how they intend to advise potential developers on* | |

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| | | | *the implementation of the local requirements, and how these will be monitored and enforced.* Implementation of the Core Strategy is fully detailed within the Delivery Strategy. | |
| | 104/ 059e | Would refer the Council to the recent Inspector's Report for the examination of the Borough of Poole Core Strategy in respect of energy efficiency requirements and the removal of unsound onerous requirements. | Comment noted. | None. |
| | 104/ 059f | PPS 1 Planning for Climate Change sets out in paragraph 11.3 that *"specific standalone assessments of new development should not be required where the requisite information can be made available to the planning authority through a submitted Design and Access Statement,* | The requirement for a Sustainability Statement to be submitted for new developments over a certain size is a requirement of the WMRSS Policy SR3 Point A. The WMRSS is not adopted and therefore Officers are still considering whether this requirement is still appropriate | None. |

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| | | *or forms part of any environmental impact assessment or other regulatory regime."* Bullet point iv) is therefore inappropriate in that it requires a sustainability statement to be provided. This should be reworded to include reference to Design and Access Statements not additional standalone assessments. | for inclusion within the Core Strategy. It is considered that the Sustainability Statement does more than a Design and Access Statement as it requires consideration of the West Midlands Sustainability Checklist. If Development Control Officers considered that all of the points that are required to be addressed in the Sustainability Statement have been fully addressed by other statements such as the Deign and Access Statement, then this would be satisfactory. However it is still necessary for the Policy to require a Sustainability Statement for those developments who have not fulfilled the requirements elsewhere. | |
| Climate Change | 133/ 207 | Typing error on page 50, paragraph 2, the sentence | Please see response to 049/736d. | None. |

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| | | should read, *'mitigate and adapt to the effects of climate change.'* This refers to new build, can this be widening to existing properties? | | |
| | | Text should be reworded on page 50 to, *'it is now accepted that the world's climate is changing and that the impacts of this are already being felt locally'*. There should also be reference to extreme weather events. | The Core Strategy no longer has introductions that are as detailed and broad as this and therefore this comment is no longer relevant. | None. |
| | | It should be mentioned the opportunities that arise from a changing climate e.g. tourism. | It is not considered that the Core Strategy would be the appropriate medium to detail the benefits of climate change as this document intends to reduce the damaging effects of climate change by reducing carbon emissions. | None. |
| | | It should be noted what level the housing development | The Core Strategy no longer has introductions or sub | None. |

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| | | scored on page 50.<br><br>The % of renewables on site should exceed the Merton Rule, 15% would show a strong commitment and gear developers up for zero carbon housing in 2016. | sections that are as detailed and broad as this and therefore this comment is no longer relevant.<br><br>The principle of this is supported, however it is considered that Redditch Borough does not have sufficient evidence as yet to prove that higher targets are deliverable or achievable and therefore the national and 10% renewable rule is likely to be used. | None. |
| Climate Change | 133/ 212 | Ambitious plans for combating climate change but this is good. | Support noted. | None. |
| Climate change | 093/ 495 | It should be noted that climate change is a cross cutting theme which has impacts on flood risk and biodiversity as well as water availability and quality. | Climate change is a well publicised issue and that it is not necessary to detail of all the effects of climate change within this document, these effects are detailed in national | None. |

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| | | | and regional planning policy. | |
| Climate Change | 103/ 164(a) | The reduction in the causes of climate change would be achieved if all super communities were supplied with heat from a CHP unit. This would reduce emissions by fifty percent, rather than the ten percent set by the DPD. The use of the Arrow Valley Lake would mitigate against climate change, rather than simply using insulation. | CHP is a form of renewable energy, which is a requirement of the Core Strategy. However it would not be appropriate to dictate which form of renewable energy should be used in each scheme due to the local differences in sites. A form of renewable energy which is suitable for one site may not be suitable for another. It is unclear how the use of Arrow Valley Lake would mitigate against climate change and how this would be appropriate for inclusion within the Core Strategy. | None. |
| Sustainable Buildings | 103/ 160 | There may be a need to combat climate change by insulating houses to a much greater degree to reduce fuel consumption, there is a danger of other effects resulting from this policy that do not seem to | Specific construction standards of properties are dealt with by Building Control standards and are too detailed for consideration within the Core Strategy. The requirement for sufficient ventilation is also | None |

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| | | be considered by the West Midlands Spatial Strategy. For example occupants need to be comfortable – with heating systems that heat the air in the house, not the fabric of the house. There is a need for fresh air to be introduced into highly insulated buildings. All buildings that are required to meet sustainable homes standards should provide adequate facilities for drying washing outside the living space.<br><br>There is a danger that requiring homes to provide 10% of the energy demand will force up the price to such an extent that the houses become unaffordable for many families. The trigger point for BE. 1 iii) should be twenty homes rather than five, and the industrial units should be 2,000 sq. | assessed through the Building Control requirement.<br><br>With the Code for Sustainable Homes there is a credit available if drying space is provided. As applicants need to achieve certain levels of the Code this is a credit that is available for applicants to implement as a way of increasing their credit score.<br><br>Affordability is a key challenge for the Core Strategy to deal with and is considered a very important issue. The cost of providing 10% of energy demand from renewable resources does add an additional cost to the build of a development, however this cost will reduce as technology | None<br><br>None |

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| | | metres. As smaller combined heat and power units are unsustainable and unreliable. | develops and renewable resources become more common place. The renewable energy requirements need to be in place to ensure that the climate change targets are achieved. The trigger point for BE.1 iii) is 5 dwellings as a number of the development sites in Redditch are very small and if the trigger point is 20 this would diminish the opportunity for Redditch to produce renewable energy. | |
| Page 49, Para 1 | 102/ 150 | Should state 'seeks to protect and enhance the natural and historic environment…' as the two elements are interlinked elements of the environment as a whole. Paragraph 3 should read 'natural and historic environment… and risks to the historic and natural environment…' this includes | This no longer applies to the structure of the Core Strategy as the paragraph is deleted. | None. |

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| | | risk of flooding to historic properties (both structural and to fittings) and desiccation of waterlogged archaeological deposits, including peat, through drought.<br><br>The abundance of trees and the present distribution of settlements and farmsteads in the borough is directly related to its historic settlement pattern and its role as a former royal forest. Historic landscape boundaries should be respected and promoted within any new development. development proposals should take account of information contained within the Historic Landscape Characterisation for Worcestershire (on-going project 2008 - 10), Historic Farmsteads Survey (on-going 2008-9) and the County Historic Environment Record. | This has been taken account of, however the Historic Landscape Characterisation for Worcestershire is not yet complete. | None. |

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| Renewable Energy and Climate Change | 265/ 420 | It is recommended that the Council introduce specific policies designed to deliver greater production of renewable energy and increased levels of energy efficiency, in order to minimise the impacts of climate change. | Agreed. There is a policy within the Preferred Draft Core Strategy that seeks to achieve this. | None. |
| Renewable Energy and Climate Change | 265/ 421 | It is recommended that the generic phrases which simply seek to encourage the use of energy efficiency, renewable energy and the minimisation and management of waste and pollution are avoided, for example, as such, phrases lack the detail and commitment necessary to ensure that such aspirations are achieved. Therefore it is strongly recommended the inclusion of an overarching climate change policy within the Core Strategy document, addressing the | It is considered that the exact wording will incorporate the appropriate detail and commitment suitable to the Core Strategy. Officers are still considering the appropriate wording to ensure the aspirations of the Core Strategy are achieved.<br><br>Officers are still considering the policies to be included within the final Core Strategy, however an overarching policy may be appropriate to outline the climate change aspirations | None. |

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| | | above issues, and the inclusion of discrete, proactive policies on energy efficiency, renewable energy, sustainable design and construction, within the Development Control Development Plan Document, in order to provide detailed policy direction on each issue and to ensure that such environmental measures are delivered. | for the Borough. | |
| Renewable Energy Policy | 265/ 422 | The LDF should include a robust criteria based policy that will be used to assess all applications for renewable energy developments.<br><br>It is recommended that there should be a specific | The Core Strategy contains a policy that promotes the use of renewable energy. A criteria based policy that would be used to assess applications would be more appropriate for inclusion within the Site Allocations and Policies DPD.<br><br>This may be a consideration for the Site Allocations and | None.<br><br>None. |

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| | | Development Control policy on renewable, focusing on the key criteria that will be used to judge applications, and providing direct reference to PPS 22. More detailed issues may be appropriate to Supplementary Planning Documents. | Policies DPD. It is envisaged this DPD will incorporate a number of specific policies that are Development Control related where this is deemed necessary and related to the allocations. | |
| Renewable Energy Policy | 265/ 423 | It is recommended that policies designed to safeguard the character and setting of Listed Buildings, Conservation Areas and Green Belt, for example, have regard to the positive contribution that renewable energy can play.<br><br>Planning Applications for renewable energy developments in areas such as | A study conducted by Worcestershire County Council has concluded that Redditch Green Belt does not have any capacity for large scale renewable energy production. With regard to Conservation Areas and Listed Buildings, their capacity to accommodate renewable energy systems is adequately encouraged by national planning policy.<br><br>This is a consideration for the Site Allocations and Policies DPD. | None.<br><br>None. |

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| | | landscape and nature conservation designations should be assessed against criteria based policies set out on Local Development Documents. Any approach should be consistent with PPS 22 and should not preclude the supply of any type of renewable energy other than in the most exceptional circumstances. | | |
| Renewable Energy Policy | 265/ 424 | Planning Authorities should not make assumptions about the technical and commercial feasibility of renewable energy projects. Technological change can mean that sites currently excluded as locations for particular types of renewable energy development may in future be suitable.<br><br>Local Planning Authorities | Noted.<br><br>Noted. | None.<br><br>None. |

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| | | should not require applicants for energy development to demonstrate either the overall need for renewable energy or its distribution, nor question the energy justification for why a proposal for such development must be sited in a particular location. | | |
| Renewable Energy Policy | 265/ 425 | All information requested of applicants should be proportionate to the scale of the proposed development, its likely impact on and vulnerability to climate change, and be consistent with that needed to demonstrate conformity with the Development Plan and the Climate Change Supplement to PPS1.<br><br>Specific and standalone assessment of new | Noted.<br><br>Noted. It is considered that if the information is provided | None.<br><br>None. |

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| | | development should not be required where the requisite information can be made available to the planning authority through other submitted documents e.g. as part of a Design and Access Statement.<br><br>An applicant for planning permission to develop a proposal that will contribute to the delivery of the Key Planning Objectives set out in the Climate Change Supplement to PPS1 should expect expeditious and sympathetic handling of the planning application. | elsewhere this would be acceptable. It would need to be made clear to Officers where this information can be found.<br><br>Planning applications that seek to deliver the Key Planning Objectives of the Climate Change Supplement to PPS1 will be looked on favourably, however each planning application is required to go through the standard development control procedures. | None. |
| Low and Zero Carbon Developments | 265/ 426 | The planning system needs to support the delivery of the timescale for reducing carbon emissions from domestic and non-domestic buildings, and | The Core Strategy is in line with the national timescales for the Code for Sustainable Homes. It is also considered that the Core Strategy does | None. |

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| | | local planning authorities are expected to actively encourage smaller scale renewable energy schemes through positively expressed policies in Local Development Documents. | encourage the development of small scale renewable energy schemes. | |
| | | Alongside criteria – based policy developed in line with PPS 22, the Climate Change Supplement to PPS 1 recommends that local authorities consider identifying suitable areas for renewable and low-carbon energy sources, and supporting infrastructure, where this would help secure their development. | A study has been completed by Worcestershire County Council which considers the capacity of Redditch Borough in terms of large scale renewable energy development. This study has identified that there is no capacity within the Borough for any large scale renewable projects and therefore there is no potential to identify land.<br><br>With regard to infrastructure that is required to support future developments, meeting have been held with infrastructure providers to | None. |

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| | | | establish whether the current infrastructure is satisfactory to deal with future development, or if additional infrastructure is needed what this is, where it is required and the funding for this. | |
| | | Small renewable systems can make a contribution. It is urged that a policy is implemented for the mandatory requirements of onsite renewables. Such a policy would require onsite renewables to provide for at least 10% of all new buildings energy needs (including refurbishment) in addition to stringent energy efficiency/ building performance requirements. | The Core Strategy contains a policy which requires a proportion of on-site renewables that supplies 10% of a buildings energy needs. Energy efficiency/ building performance is enhanced through the Code for Sustainable Homes – which is also contained within a policy in the Core Strategy. With regard to refurbishment there is little the Core Strategy can do to ensure established building incorporate a proportion of renewable energy; however there are grants available from the Council which can aid in | None. |

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| | | | achieving this. | |
| | | It is recommended that there is a discrete policy on sustainable design and construction methods, and the introduction of minimum efficiency standards for extensions, change of use conversions and refurbishments/ listed building restorations. | It is considered that the Policy focusing on climate change fully addresses sustainable design and construction methods and an additional policy is not necessary. The principles set out in this policy would not be applicable to extensions, change of use conversions and refurbishments/ listed building restorations as this is too detailed for the Core Strategy. | None. |
| | | Planning authorities should have an evidence- based understating of the local feasibility and potential for renewable energy and low-carbon technologies, including microgeneration, to supply new development in their area. | The 'Green Strategy' Technical Paper will detail the feasibility of renewable energy in the Borough. | None. |

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| | | Local authorities should –<br>- set out a target percentage of the energy to be used in new development to come from decentralised and renewable low-carbon energy sources<br>- where there are particular and demonstrable opportunities area or site specific targets should be used to secure this potential<br>- set out the type and size of development to which the target will be applied<br>- ensure there is clear rationale for the target and it is properly tested. | All of these factors have been considered and will be incorporated into the renewable energy policy within the Core Strategy.<br><br>Where it is considered and demonstrated that a particular site could deliver a higher proportion of renewable energy than that stipulated in the Core Strategy this will be outlined in the Site Allocations and Policies DPD or any future Area Action Plans.<br><br>The 'Green Strategy' Technical Paper will detail the rationale for any targets within the Core Strategy. | Amend policy in line with WMRSS. |
| | | It is recommended that the development plan provide a brief outline of the different renewable energy generation | It is considered that this would be too detailed for the Core Strategy and would also make the Core Strategy unduly long. | None. |

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| | | technologies and equally encourage and promote all forms of renewable energy. | This detail is included in a climate change leaflet which is sent out to applications for planning permission. | |

## *Cross Boundary*

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| Cross Boundary | 002/068; Prof P Sanders | Agree Bordesley area is the best direction for houses because of its infrastructure namely good roads, new school in Alvechurch, good bus services and access to a train service. It seems incomprehensible that all new houses will gain access via the minor roads of Dagnell End Road or the Holloway. Surely the boundary should be west towards the Cobbs Barn roundabout instead of north towards Rowney | The Panel Report following the Examination in Public into the WMRSS Phase II Revision was published in September 2009. The report recognises that there is insufficient land within the Borough boundaries to meet locally generated needs for either housing or employment. The Panel report recommends that that the overall provision for Redditch should be 7,000 dwellings, of | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development.<br><br>Update Key Diagram to show the broad location of the SUE boundary to be determined in collaboration with Bromsgrove District Council following joint consultation period. |

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| | | Green as suggested by the WYG report? | which 4,000 should be provided within the Borough boundaries. The remaining 3,000 dwellings are to be located in Bromsgrove district adjacent to the boundary of Redditch with the precise location to be determined locally.<br><br>At the time of the production of the PDCS, the evidence base suggested that the most appropriate location for a SUE to Redditch would be Bordesley Park. The site boundaries and details regarding access of any SUE were not determined at the time of publishing the PDCS, also the precise boundaries are not required to be identified in Core Strategies in any case. Sufficient boundaries will be determined in further discussion with landowners, developers and Redditch and Bromsgrove | |

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| | | | Councils. It is anticipated that any precise Green Belt alterations will be detailed in either the Redditch or the Bromsgrove Core Strategies, depending on the outcome of further exploration. | |
| Cross Boundary | 002/254; Prof P Sanders | Except a road from area 4 to meet up with Cobbs Barn roundabout to carry the traffic from areas 2, 3 and 4 rather than use minor roads of Dagnell End and Storrage Lane. Bordesley Bypass is essential. | The site boundaries and details regarding access of any SUE were not determined at the time of publishing the PDCS; also the precise boundaries are not required to be identified in Core Strategies in any case. Sufficient boundaries will be determined in further discussion with landowners, developers and Redditch and Bromsgrove Councils. | No change. |
| Cross Boundary | 005/480; William Davis Ltd | Welcome acknowledgement that cross boundary growth and joint working with Bromsgrove and Stratford-on-Avon Councils is needed. Support identification of Bordesley Park as the most | See response to respondent No. 002/068. | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development. |

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| | | suitable location for future growth. It is highly sustainable. | | Update Key Diagram to show the broad location of the SUE boundary - to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 005/481; William Davis Ltd | Welcome the Council's indication that they will liaise closely with Bromsgrove/Stratford but are concerned that this joint working does not go far enough. Favour production of joint Core Strategy for the three Districts. | The three Local Authorities have been continuously working together to produce the respective Core Strategies however there have been differences of political opinion which has made progression through Core Strategy production difficult for the three Authorities. The possibility of a joint Core Strategy was explored however it was unanimously determined that this was unfeasible for the three Local Authorities involved for both practical and policitical reasons which would have significantly delayed any Core Strategy production. | No change. |
| Cross | 016/069; Mr JC | Concerned that any new housing | Agreed based upon the | No change. |

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| Boundary | Lane | development built out from the Batchley/Webheath areas into Brockhill and Hewell will have a detrimental effect on the wildlife in the area. Argues that the woodland and lake on the estate are important ecological areas which need to have green buffers around them. | Evidence Base. The Panel Report into the WMRSS Phase II revision recommends that to meet Redditch's needs 3,000 dwellings should be built in Bromsgrove district adjacent to the Redditch boundary but that the locations should be determined locally. Further evidence will be collected to determine where Green Belt allocations should be made and where development would be more sustainable. | |
| Cross Boundary | 017/251; CPRE | Questions the line of the Bordesley Bypass, scheduled for some time and long overdue.<br><br>River Arrow is a constraint of the smaller area identified. This is an intense wildlife corridor with flood | The detail regarding the exact route of the Bordesley Bypass will be determined. The amount of growth to be accommodated in and around Redditch is likely to necessitate the construction of the Bordesley Bypass.<br><br>Agreed. Officers consider the ecological profile of the River Arrow to be of high importance. | None.<br><br>None. |

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| | | terracing on both sides of the River. It should not be built upon. | Potentially any open space provision should look to improve the biodiversity as part of any SUE. | |
| | | Larger area has the Dagnell Brook more or less through the centre. It goes through Lower Park Farm and is joined by another Brook further South which then forms a tributary to join the River Arrow. River terracing will occur both sides of each brook and again this has to be considered against any building of any type. | It is considered that the extent of river terracing is not likely to be high in this location. It is agreed that any future uses for this area should comply with the provisions in PPS25. | Apply the provisions of PPS25 to the north of Redditch in determining the location of any SUE. |
| | | 8Ha of employment land and 1,680 residential units is an enormous build. | The employment and housing land requirements for Redditch Borough are determined by the WMRSS. | None. |
| | | In both areas there are footpaths which are Public Right of Way:<br>• Lower Park Farm to the North | This is a detailed consideration which will influence the likely location of any SUE. | Consider the rights of way to the north of Redditch in determining the location of any SUE. |

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| | | of Poplars Farm<br>• Beoley Hall to and crossing Dagnell End Road into the Abbey Golf Club site<br>• Bordesley Park Farm crossing Dagnell End Road<br>• Rowney Green to Bordesley Park Farm<br>• Rowney Green through Lower Park Farm to Poplars Farm<br>• Lower Park Farm to Bordesley Park Farm<br>And footpaths exists both sides of the River Arrow in the smaller area. | | |
| Cross Boundary | 017/252; CPRE | Ravensbank Business Park - The black shaded area of 10Ha for employment is Green Land. It is more flat land attached to the existing Ravensbank Business Park buildings. Along these is Drovers Road with the status of SWS. The line of the Drovers Road is in Redditch Borough only, the built on land is in Bromsgrove. | The status of Drovers Road being listed in the County Council's list of streets does not preclude any potential development. The sensitivity of the SWS needs to be considered should any development occur in this area. | Redraft cross-boundary elements of the Core Strategy and include reference to the need to protect any relevant SWS. |

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| | | The Drovers Road is entered in the List of Streets. The Ancient Highway has already been breached three times. Any further breaching for business purpose will destroy the total amenity. It is therefore a constraint for development.<br><br>Miss J Kirkbride states in her submission for the EiP that Bromsgrove has a surplus of employment land. So why is this location being identified as it is in Bromsgrove District. Also the land appears to be an ADR by BDC, who it is understood, do not have the knowledge of the protection accorded to the whole Drivers Road from Beoley Village to Longhope Close in Winyates Green. The Far Moor Lane stretch is nothing to do with BDC.<br><br>How much more of the Ravensbank Business Park area is | The employment land requirements are to meet the needs of Redditch's population and should be within or adjacent to the Borough.<br><br>At 01.04.09 the remaining capacity at Ravensbank was 4.18ha, this is to meet Redditch Borough Council's | None.<br><br>None. |

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| | | there earmarked as employment land, and is it for BDC or RBC? With surplus employment land BDC will not require this site. Is this how it works? It was RBC who wanted the Business Park, not BDC.<br><br>Much employment land and buildings in Redditch is also available and needs to be considered for future use before releasing this identified site and CPRE object strongly to its early release before all unused employment locations are utilised. | requirements. The site was designated to meet RBC's employment land requirement, therefore it does not have an effect on Bromsgrove's designations, apart from being in their District. However the remaining capacity is not surplus and it is expected to be developed in due course.<br><br>Those sites identified in Local Plan No.3, inclusive of Ravensbank, were not allocated on a sequential basis. Some vacant units are not considered to meet the needs of the current market, and therefore prohibiting economic development elsewhere would be unsustainable. | None. |
| Cross Boundary | 017/253; CPRE | Foxlydiate - a woodland reserve site: The Green Area is two blocks, one each side of the Bromsgrove Highway A448. The road bridge is | It is not clear what the representation is referring to in terms of impacts on Batchley and Webheath; however any | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross- |

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| | | an advantage for both blocks as a main road access. The Northern Block reaches to the Hewell Grange area and impacts on Batchley. The Southern Block impacts on Webheath. Foxlydiate LNR is nearby but not included. Both blocks have footpaths which are Public Rights of Way and will be constraints where development is concerned, as are the rivers passing through both blocks. The size of these two blocks has not been given and whether it would be for housing only. As an extension for housing and as there are no employment facilities, building here will produce dormitory districts. Would need to include new schools and other infrastructure.<br><br>The required environmental survey along the river arrow will need to be established initially and | impacts would be investigated as part of the sustainability appraisal process. It is accepted that the public rights of way would need to be considered when concluding the most appropriate location for any SUE. The provisions of PPS25 will be adhered to with regard to the flooding constraint identified. It is considered that the WYG study referred to residential development predominantly for the Foxlydiate Woods option. It is acknowledged that the nature of the location is distant from other employment areas, and this will be taken into account of in the sustainablitlity appraisal and in determining the location of any SUE.<br><br>Full ecological surveys would be appropriate before any development can come | boundary development.<br><br>Re-draft cross-boundary elements of the Core Strategy.<br><br>None. |

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| | | monitored. | forward. | |
| Cross Boundary | 021/100; WMRA | Suggests that the level of housing growth outlined for Redditch in the Core Strategy falls around 30% short of that required by the Preferred Option of the WMRSS.<br><br>Whilst the Redditch draft Core Strategy makes reference to Bromsgrove and Stratford-on-Avon accommodating a higher level of housing growth than set out in the Preferred Option in order to compensate for the shortfall in Redditch, neither of the draft Core | The Panel Report following the RSS Phase II Examination recommends that the housing target for Redditch should be increased to 7,000 dwellings, of which 4,000 should be accommodated within Redditch's boundaries. The publication version of the Core Strategy will reflect the increased target and a period of public consultation will be held to allow consideration of potential locations for the increased number in conjunction with Bromsgrove District Council.<br><br>It will be for the Core Strategies of neighbouring Districts to refer to its proportion of Redditch related growth. | Consultation period to be held for the purposes of consulting on potential locations for development that have not previously been the subject of consultation.<br><br>No change. |

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| | | Strategies for these districts adopts this extra growth. | | |
| Cross Boundary | 024/112; C Wittingham | Support for growth in three areas identified by White Young Green. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 028/102; GOWM | Considers that the Council has accepted the findings of the White Young Green Study and incorporated them into the draft Core Strategy, but asks whether the conclusions have been tested, particularly through the sustainability appraisal. Suggests this will be a factor in the Examination of the Core Strategy. | Please Refer to Technical Paper 1 - Sustainability and the SA Refresh which appraises all development options in and around Redditch against Redditch's SA Framework. | No change. |
| Cross Boundary | 036/114 | Endorses the allocation of housing growth in the Bordesley area. Cites the capacity for Alvechurch Bypass to support any growth in traffic; the | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show |

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| | | accessibility to industry on the east side of Redditch and; accessibility to the Town Centre and Abbey Stadium sites as justifications for housing development in Bordesley. | | the broad location of the SUE - to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 036/116 | Disagrees with plans for Foxlydiate as a site for housing allocations, arguing it is piecemeal and would overload a dual carriageway that already experiences a number of accidents. | The housing requirements are set out in the WMRSS and the required provision will be set out in the Core Strategy. The Redditch Green Belt site at Foxlydiate would be subject to the consultation period between Redditch and Bromsgrove and factors such as road capacity would be considered. | No change. |
| Cross Boundary | 041/718; Mr Bedford Smith | The site at Bordesley has immense residual advantages apart from gravity drainage, of proximity to Sainsbury's and recreational facilities and Abbey Stadium | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE - to be determined in collaboration with Bromsgrove District Council. |

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| Cross Boundary | 042/462; Stoneleigh Planning c/o Gallagher Estates | Show the preferred locations for 4,350 homes and 24ha of employment land beyond Redditch's boundary. | Green Belt alterations to accommodate development requirements will be detailed in the Redditch and Bromsgrove Core Strategies as appropriate. The site boundaries and details regarding access of any SUE were not determined at the time of publishing the PDCS; also the precise boundaries are not required to be identified in Core Strategies in any case. Sufficient boundaries will be determined with further discussion with landowners, developers and Redditch and Bromsgrove Councils. | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 042/463; Stoneleigh Planning c/o Gallagher Estates | There is an absence of an appropriate policy approach to the future growth of Redditch based on the WYG Study, delaying core strategy preparation. | The approach to delivering Redditch's development requirements both within the Borough and cross-boundary has been explained at each stage of Core Strategy production despite the constraints on the Borough | Re-draft cross-boundary elements of the Core Strategy. |

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| | | | Council and the lack of clarity throughout the progression of the WMRSS Phase Two revision. Redditch Borough Council has been unable to include policies on land outside of the boundary of the Core Strategy DPD area. | |
| Cross Boundary | 042/466; Stoneleigh Planning c/o Gallagher Estates | Clients remain committed to delivery of a strategic mixed use development at Bordesley Park Farm and agree that land in this area represents the most sustainable location for the future growth of Redditch to 2026. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 084/122 | Concerned with the number and location of houses to be provided in the Borough to 2026. Believes that it is disappointing that green belt land will need to be utilised in order to satisfy growth requirements in Redditch. Argues firmly against the WMRSS | The number of houses to be provided for Redditch is determined by the WMRSS Phase Two Review process. The requirements for Redditch and the exhaustion of sites within the urban area mean that it is inevitable that some Green | No change. |

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| | | classification of Redditch as a Settlement of Significant Development, suggesting that rather this designation should be switched to Bromsgrove. Suggests that the use of green belt land for development in Redditch contradicts the WMRSS aim of urban regeneration. | Belt land in or around Redditch will need to be used for development. The designation of Redditch as SSD is not carried forward in the Panel Report. Bromsgrove has not been classified as an SSD. | |
| Cross Boundary | 084/124 | Strongly recommends directing the majority of housing growth at Bordesley rather than Foxlydiate. Firstly, all of the growth that cannot be accommodated within the Borough boundary can be provided for in one location at Bordesley. Secondly, the use of Bromsgrove green belt land can be partly offset by returning the three ADR locations in Redditch back to green belt. Finally, recommends expansion at Bordesley given the lack of growth opportunities elsewhere, the existing and potential road infrastructure at | See response to respondent No. 002/068. | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development.<br><br>Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |

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| | | Bordesley and the area's accessibility to the Town Centre and future Abbey Stadium development. | | |
| Cross Boundary | 095/139 | Strongly supports the designation of housing at Bordesley as it is a large enough site to accommodate all of the housing. Believes this would be the logical option given the area's road structure and access to the Town Centre and business sites, as well as the planned development at the Abbey Stadium. | See response to respondent No. 002/068. | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development.<br><br>Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/004 | Criticises the WYG report's omission of the North West Urban Extension for Redditch outlined by RPS as an option for consideration for future housing development. | RBC has assessed a number of development alternatives, including the option put forward by the objectors in the SA. It was important that the consideration of all possible | No change. |

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| | | | development options was not constrained. This would have been the case had the WYG Joint Study considered the site development boundaries of options put forward by prospective developers/landowners. It is therefore appropriate that the WYG study did not consider the specific area noted as the North West Urban Extension in isolation. | |
| Cross Boundary | 104/006 | Expresses concern for First and Second Stage reports from WYG, acknowledging that whilst the Stage 1 report undertook a fairly comprehensive assessment of possible growth options, the Stage 2 report was neither comprehensive nor robust. | It was always intended that the WYG Stage 2 report identified the specific constraints to development with the aim of determining the preferred location so that the split to the development requirements between the three authorities could be made by the WMRSS Examination in Public and is by its nature more focussed that the Stage 1 report. | No change. |

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| Cross Boundary | 104/007 | The Stage 2 report cannot be reliably used to inform development choices within the Bromsgrove District of Redditch Borough. | In addition to comments received during consultation on the Core Strategy, the Stage 2 Report was used in conjunction with the Redditch SHLAA, Sustainability Appraisal and the Public Open Space Standards in the Borough document to inform development choices for Redditch in the Preferred Draft Core Strategy. | No change. |
| Cross Boundary | 104/008 | Suggests that in lieu of the proper and clear SHLAA methodology, the WYG report uses simplistic, inappropriate and primitive SWOT analysis methods for assessing the developability and deliverability of land that are insufficient for advising a development strategy for the Borough or the wider requirements of Redditch town on a cross-boundary basis. | There are a number of elements which will be considered when revising the development strategy for the Borough following the WMRSS Panel Report. | Re-draft cross-boundary elements of the Core Strategy. |
| Cross Boundary | 104/009 | The Council should revert back to developing and expanding upon its existing SHLAA process as part of | SHLAA updates will be undertaken annually, but it is not necessary for these to be | No change. |

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| | | a joint assessment undertaken with Bromsgrove District Council. | undertaken jointly. The Borough Council will explore potential ways to improve the SHLAA process. | |
| Cross Boundary | 104/010 | Considers that the WYG Stage 2 Report falls significantly short in respect of its project brief and does not provide an objective and equal assessment of growth options for Redditch. The project brief also makes no reference to assessing the deliverability or developability of sites in the context of PPS3. | The SHLAA process for Redditch Borough has been developed in line with PPS3 guidance and includes consideration of potential deliverability and viability issues. It was never the intention of the WYG Stage 2 study to do this. | No change. |
| Cross Boundary | 104/011 | Questions the entire removal of area 6 and partial removal of area 5 from the assessment without justification, despite these sites being given considerable support in the site analysis stage. Considers the removal of these sites, without proper reasoning or consultation as rendering the study unsound and inequitable. | Justification for this can only be given in the WYG2 Second Stage Report. Further SA of areas 5 and 6 indicate that area 6 is favourable whereas area 5 may have some constraints. In addition the Water Cycle Study and SFRA indicate that development of this area is likely to be difficult and hence more costly. | No change. |
| Cross | 104/011b | Given the removal of areas 5 and | The initial evidence base | No change. |

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| Boundary | | 6, questions are raised as to whether the full details of the North West SUE proposal promoted by RPS were given to WYG or whether either the Council or WYG had predetermined that the area should not be included in the study. Seeks justification as to why the area promoted by RPS was not included in the study in its entirety and the reasoning behind the removal of area 6, despite it including the Brockhill East ADR land accepted by the Council as the most sustainable peripheral housing site at the last Local Plan Inquiry. | indicated to RBC that as a general direction of growth, the north of Redditch was preferable and the development option put forward by the objector was considered as a valid alternative option. Indeed at Issues and Options stage RBC presumed that parts of area 6 would inevitably be developed. | |
| Cross Boundary | 104/014 | Challenges the exclusion of area 6 from the assessment, given the findings in the WYG report that there is no reason to assume that a technical solution to water and foul drainage cannot be found and as such these issues have not influenced the conclusions | WYG conclusions as well as the SA of their options were considered to be the main factors influencing the decisions on the preferred option for Redditch at this stage. | No change. |

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| | | regarding the most sustainable locations for extensions to Redditch's urban area. | | |
| Cross Boundary | 104/015 | Criticises the approach to sustainability in relation to landscape character and visual resources used by WYG as outdated and flawed. Suggests WYG is out of step with current Government guidance on the delivery of Green Infrastructure. | Landscape character was given further consideration in the final revisions to the WYG conclusions. | No change. |
| | 104/015a | Focus on 'significant weight of qualitative considerations' is outdated methodology. Landscape types surrounding Redditch are based on the 'A New Look at the Landscapes of Worcestershire, 2004' as opposed to the stated document 'Planning for Landscapes in Worcestershire : Worcestershire Landscape Character Assessment : Process, Products and its role in the Planning System' June 2008. | Landscape designations are appropriate considerations when looking at the development potential of sites. It is understood that both the 2004 and the 2008 Landscape Character Assessment was considered during the preparation of the WYG Report. | No change.<br><br>No change. |

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| | | Assessment level of Landscapes for Worcestershire is a large scale county assessment rather than local area of Redditch. Questionable whether there is sufficient local information for use as an assessment tool in terms of sensitivity and quality. In the document landscape sensitivity weighting is given on the basis of landscape types without reasoned justification for their classification.<br><br>Discrepancies regarding sensitivity weighting of landscape types e.g. Area 2 Brockhill ADR Advantages and Disadvantages table states the area is "a highly sensitive wooded estateland landscape. Highly visually sensitive. Development here would be visually intrusive". But there is no mention of this area being visually sensitive in the original wooded estatelands landscape type information. Plan 5 Brockhill | The Worcestershire Landscape Character Assessment is a very detailed assessment for use by District Council's as well as providing a general County function. No more detail can be added to a District wide LCA. The landscape designations were given significant weight in forming the conclusions in the WYG Report.<br><br>The sensitivity information was determined from the sensitivity mapping rather than the description of the landscape types. | No change. |

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| | | topography shows land north and west of the ADR as contained with direct visual links with surrounding development. Lack of handedness regarding sensitivity rating with Area 1 Bordesley Park classed as 'low or medium sensitivity' despite being adjacent to Brockhill Character Area and in the same wooded estates landscape type. No justification for change of definition.<br><br>North West Masterplan SPD has been overlooked by WYG in second stage study. | The WYG report was commissioned jointly by the three Local Authorities of Redditch, Bromsgrove and Stratford and Worcestershire County Council and the West Midlands Regional assembly as an independent and comprehensive assessment of development options, hence the report not considering the outcomes of other assessments including the landscape assessment accompanying the NWMP.<br><br>Officers cannot find the | No change.<br><br>Hold a joint consultation period with Bromsgrove District Council on the |

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| | | The landscape assessment accompanying the NWMP found that at Brockhill ADR (para 6.6) "*the area of Site A (ADR land) north of the railway is visually sensitive. It forms part of the Avon Valley Character area. From many viewpoints to the north it appears unconnected with Redditch"* (RPS emphasis). In contrast land to the west of the railway line within the ADR is identified as having visual sensitivity at higher ground but with opportunities to restore landscape character. Para 6.7 states the lower part of Site A is visually well contained, is least sensitive to change and provides a good opportunity for development. In respect of the Bordesley Parkland Landscape Type (Cooper Partnership Plan L05) the comment on constraints and opportunities was that the | reference to paragraph 4.21 comments in the draft NWMP. The opportunities for development will be investigated further when determining the location for any potential SUE. | potential locations for cross-boundary development.<br><br>Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE - to be determined in collaboration with Bromsgrove District Council. |

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| | | landscape character of Bordesley Parkland would remain unchanged by development of Site A. The importance of retaining that character is addressed in Chapter 4 of the report (Para 4.21).<br><br>ADR west of the railway except for extreme north western fringes is identified by Cooper Partnerships as being in the Redditch Bowl Landscape Type (Type 3 on Plan L05). This area has low sensitivity to change (Para 4.19). This conclusion also relates to land in the Green Belt north of Lowans Hill Farm and west of Brockhill development area in Bromsgrove surrounding Oxstalls Farm. Land North and North east of the railway line in the ADR is in Landscape Type 2 Arrow Valley Area. Character extends north from the Redditch urban edge between the railway and the A441. Sensitivity to change is low adjacent to the | Landscape sensitivity has been determined in the Worcestershire Landscape Character Assessment which will inform the potential locations for any SUE. | None. |

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| | | urban area but increases north where land becomes rural (para 4.19). Land west of the railway and north of the ADR and Brockhill development area is Wooded High Ground Landscape Type 1. There are prominent ridges but also enclosed valleys (para 4.13) and concluded to be 'sensitive to change' with valued landscape features contrasting with intact nature of Bordesley Parkland area and its high sensitivity to change.<br><br>Regrettable that the Council has disregarded local evidence in consideration of the Core Strategy.<br><br>STW commented that land west of the town would require pumping of sewerage which would be less desirable than gravity based solutions. STW have confirmed that there would be no comparative advantage for development to the north or north | All local evidence will be used to inform all Core Strategy approaches.<br><br>It is understood that the representative from STW referred to pumping of sewerage as being 'unsustainable' which would concur with the findings of the SA Refresh of development options.<br><br>Noted. | No change.<br><br>No change.<br><br>No change.<br><br>Hold a joint consultation period with Bromsgrove |

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| | | west of the town.<br><br>SUDS can be achieved in the Batchley Brook and Red Ditch corridors.<br><br>Include assessment of NW Redditch option in the Water Cycle Strategy.<br><br>Requires a more detailed assessment of transportation issues relating to all options. Bordesley is on the A441 and is more likely to encourage car borne commuting to the conurbation. | It is agreed that more detailed understanding of the drainage infrastructure required for any Sustainable Urban Extension is required and this is being investigated.<br><br>Agreed. Transportation matters will be investigated when determining the location of a SUE for Redditch in collaboration with Bromsgrove District Council. | District Council on the potential locations for cross-boundary development.<br><br>Undertake further investigation on transportation matters. Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development. |
| Cross Boundary | 104/016 | With regard to the principal aim of Redditch Green Belt to 'prevent neighbouring towns coalescing, to prevent unnecessary sprawl and to safeguard the countryside', it is | The SA suggested that area 6 would be sustainable option, more so than area 5. The WYG report suggests that the area would be less preferable for | No change. |

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| | | suggested that North West Redditch (areas 5 and 6) is a preferable location for development as topography and landscape features form robust and defensible outer boundaries. Also suggests the inappropriateness of Bordesley Park given the risk of coalescence with Rowney Green. | development because of the prominence of the ridge and its highly sensitive landscape. With regards to coalescence, Rowney Green is not a defined settlement. | |
| Cross Boundary | 104/016b | WYG acknowledge that their proposed expansion at Bordesley Park will result in coalescence with Bordesley itself, thus failing their own key PPG2 test.<br><br>Area 1 is virtually undevelopable due to the lack of access and fragmentation caused by the central floodplain corridor of the River Arrow. | Coalescence of settlements is not applicable in this location because Bordesley is not classified as a defined settlement.<br><br>Any development potential of sites is determined in line with PPS25. | No change.<br><br>No change |
| Cross Boundary | 104/017 | Challenges WYG's reliance on the Bromsgrove 'High Landscape Value' designation and its application to Redditch in line with | WYG's landscape interpretations are logical and can also be supplemented by consideration of WCC | No change. |

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| | | national policy that directs the replacement of such historic landscape quality designations with recommended Natural England/Landscape Institute characteristic approach. | Landscape Character Assessment. | |
| Cross Boundary | 104/018 | Questions why no photographs are provided to illustrate the North West SUE proposal whilst photographs are used to illustrate both Areas 7 (Beoley) and 8 (Bordesley Park). | Inclusion or exclusion of photographs is not considered to represent anything of relevance. | No change |
| Cross Boundary | 104/019 | Suggests that WYG's analysis of Areas 1 (Webheath) and 3 (South West green belt) at Foxlydiate Woods demonstrates a marked lack of impartiality. Both topographically and in terms of orientation these areas are very similar to Webheath, rejected earlier in the report. | The location, topography and other site features make these two sites incomparable. | No change. |
| Cross Boundary | 104/020 | Suggests that the WYG report fails to recognise the full potential for development to the North West of Redditch and therefore does not | Advantages/Disadvantages of each location were assessed in the WYG Stage 2 report. | No change. |

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| | | consider the benefits that could be delivered through a mixed use Sustainable Urban Extension (SUE) located in this area. | | |
| Cross Boundary | 104/021 | Proposes that development to the North West of Redditch would have better transport links than at Bordesley Park, with 5 or 6 vehicle access points to the existing highway network and connections to the A441 and A448. In contrast, Bordesley Park relies heavily on the existing A441 for access to the town centre as well as Ravensbank Drive to which vehicle access would be concentrated to one loading point to the South East. Suggests development would introduce delays and congestion on the route for traffic leaving Redditch towards the M42 corridor. | It is considered that all development options would involve some infrastructure investment. | No change. |
| Cross Boundary | 104/024 | Criticises WYG Sustainability Appraisal and argues against its adoption. Suggests that the | The SA Refresh undertaken by Redditch Borough Council appraises all development | No change. |

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| | | assessment is a very simplistic approach to SA in which the short responses to the sustainability criteria cannot be considered appropriate or robust enough to assess the significance of environmental, social and economic effects of growth options associated with major urban extensions.<br><br>Criticises the lack of consultation, identifying that stakeholders have not been presented with the opportunity to comment on the range of options thus denying the inclusion of the North West Urban | options in and around Redditch. SA of background documents/evidence base was not required. The WYG Second Stage Report is accompanied by a simple SA matrix which builds upon the draft SA completed for the Core Strategy. The SA matrix accompanying the WYG Report does not purport to be a formal assessment as it does not relate to either a plan or programme as defined by the relevant SEA Regulations. However, it was produced to provide a basis for assessing and understanding the sustainability implications of development in different locations.<br><br>The preparation of two Core Strategies to deal with the cross boundary issues coupled with uncertainties in the RSS | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development. |

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| | | Extension option. Equates the Council's processes with the failings of the Restormel Borough Council Core Strategy which was criticised for its lack of public consultation and fell short of the approach required by SA.<br><br>Concludes that the WYG appraisal process is superficial in content, does not contain the most reasonable of all the alternatives to the preferred strategy, and the options have not been subject to consultation as set out in the Project Brief. The Council would, therefore, be challenged if it relied | Phase Two Revision process has made the process complex. Consideration of all alternative options with cross boundary implications have been dealt with as far as practicable within RBC's core strategy, sustainability appraisal and evidence base. There have been many opportunities over and above the normal opportunities, for consultees and stakeholders to be involved in the core strategy process and it is noted that the objectors have used these opportunities to make their comments.<br><br>The WYG report fulfils the brief in determining the preferred location for future growth in and around Redditch. There have been many opportunities over and above the normal opportunities, for consultees | No change. |

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| | | on the document. | and stakeholders to be involved in the core strategy process | |
| Cross Boundary | 104/026 | Argues that neither Redditch nor Bromsgrove authorities have satisfactorily identified specific land to accommodate 3,300 dwellings in a justified or effective manner. Neither has the Redditch Core Strategy identified specific land to meet its own requirements within its administrative area. Furthermore, it is suggested that the Core Strategies do not align in any kind of coherent strategy compatible with RSS Policy CF3. | The residential requirements for the Borough as set by the WMRSS will be reflected in the Redditch Core Strategy and the remainder in Bromsgrove District will be reflected in the Bromsgrove Core Strategy. | Change the development requirements to be accommodated in Redditch Borough. |
| Cross Boundary | 104/027 | Suggests there is an absence in the spatial planning for Redditch by Bromsgrove District Council to plan proactively for the 8ha of employment land required to be provided within Bromsgrove and/or Stratford. It is suggested that an urban extension within Bromsgrove is the most sustainable option and therefore | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE - to be determined in collaboration with Bromsgrove District Council. |

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| | | the Council should be more proactive in identifying suitable land. | | |
| Cross Boundary | 104/028 | Suggests there is an absence of a sound policy to address Green Belt issues around Redditch in the Core Strategy. Green Belt policy around the periphery of Redditch will require a substantial assessment in order to determine the most appropriate location for growth within the district of Bromsgrove. It is suggested that the current evidence base prepared by Redditch Borough Council and WYG is neither credible nor robust. There is a need for a comprehensive and objective based assessment of the Green Belt around Redditch. | The WMRSS provides adequate reasoning for Green Belt adjustments within Redditch. The development requirements set will necessitate Green Belt release. It is anticipated that reference to Green Belt alterations will be detailed in Redditch's and Bromsgrove Core Strategy as appropriate once the development strategy for Redditch and the broad location for growth in Bromsgrove is determined following consultation. | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development.<br><br>Re-draft cross-boundary elements of the Core Strategy. |
| Cross Boundary | 104/031 | Suggests that the findings that 2,243 dwellings can be provided within the Borough with the remaining 4,357 to be provided in Bromsgrove are based upon weak | The residential requirements for the Borough as set by the WMRSS will be reflected in the Redditch Core Strategy. | Re-draft cross-boundary elements of the Core Strategy. |

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| | | evidence. It is also contrary to RSS policy which requires 3,300 dwellings within the boundary, for which there is capacity on the sites promoted by RPS. | | |
| Cross Boundary | 104/032 | Suggests that the two spatial approaches to cross-boundary spatial planning to be found in the Redditch and Bromsgrove Core Strategies are incompatible, and despite both being Preferred Options documents, do not propose development in the same location as each other. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/033 | Suggests that the Core Strategies do not provide a comprehensive spatial development strategy for the area that is consistent with each other and as such fail the test of deliverability outlined in paragraph 4.45 of PPS12 which requires local authorities to align development plans with other relevant plans and strategies relating to adjoining areas. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |

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| Cross Boundary | 104/033b | Considers that the existing approach does not provide strong direction and requires additional work to resolve inconsistencies and incompatibility. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/035 | Support for North West Redditch SUE in particular with reference to the potential for higher housing implications following the examination of the RSS. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/040 | Support for North West Redditch SUE. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross | 104/041 | Sets out detailed support for the | See response to respondent | Re-draft cross-boundary |

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| Boundary | | North West Redditch SUE, including the suitability of the 3 parcels of land at Brockhill East, Brockhill West and Brockhill North. Outlines the merits of the site in terms of landscape and green infrastructure, ecology, drainage and flood risk, transport and accessibility, retail, health, education and employment opportunities. Identifies both the availability and deliverability of the site. | No. 002/068. | elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/042 | Criticises the Council's disregard for proposals at North West Redditch made by RPS and the Council's incomplete approach to assessing the alternative options for providing the levels of growth indicated in the RSS. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/045 | Supports Redditch Council's decision for Bromsgrove Council to identify the exact location of the sites to deliver growth adjacent to | See response to respondent No. 002/068. The residential requirements for the Borough as set by the WMRSS will be | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show |

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| | | Redditch, but recommends greater consistency between the two Core Strategies. Suggests that without a clear strategy compatible with Bromsgrove, Redditch Borough Council cannot demonstrate a clear housing delivery trajectory for the full plan period. In order to be sound, the Core Strategy for Redditch must ensure that its own regional requirements are accommodated. | reflected in the Redditch Core Strategy. | the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/047 | Proposes that Redditch must identify the location for growth in co-operation with Bromsgrove. This should be done as a strategic site that enables the Council to deliver its own requirement through a phased approach to the urban extension to the North West of the town. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/049 | Suggests that should the Council continue with its current approach to cross-boundary growth, RPS will be able to demonstrate that | The site referred to as the North West SUE was considered by WYG, and also throughout the Core Strategy | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross- |

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| | | proposals for the North West SUE have been overlooked within the WYG Phase 2 Report, Redditch SHLAA, Redditch Core Strategy SA Report and equivalent Bromsgrove documents. Furthermore the proposals have not been subject to public consultation nor have been considered within the Strategic Flood Risk Assessment or Water Cycle Survey. Suggests that the North West SUE proposal be reconsidered. | process. Consultation on development options in and around Redditch will be undertaken. In determining the locations for development, all evidence will be considered to justify that choice. | boundary development.<br><br>Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/053 | Argues that the Council has not undertaken a robust assessment of the land that currently forms Green Belt to determine whether it can provide sustainable solutions to the delivery of housing and suggests there are viable options for growth to the North West of Redditch. Suggests that the Council should rely neither on the WYG report nor the Redditch | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |

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| | | Green Belt document, but rather should undertake a review of the Green Belt and determine the most appropriate locations for development adjacent to Redditch. Identifies the Council's own evidence in the WYG report as favouring growth into Bromsgrove and suggests that the North West SUE would facilitate the Green Belt role of checking the unrestricted sprawl of large built-up areas. Suggests that the North West SUE would not only prevent neighbouring towns merging into one another as required for Green Belt land, but would enhance the area of urban fringe to protect existing surrounding settlements from encroachment. In contrast, it is suggested that the preferred option of Bordesley Park would undermine the role of the Green Belt. Identifies the North West SUE as fulfilling the role of safeguarding the countryside from | | |

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| | | encroachment. The site forms a sensitive, logical and well-integrated expansion of the existing urban area and provides a significant amount of green infrastructure. Suggests that development to the North West of Redditch would not only preserve but enhance the setting and special character of Redditch as a new town, whilst development at Bordesley would not provide such opportunities given its detachment from the existing urban area. Argues that development at the North West of Redditch would assist in urban regeneration, whilst development at Bordesley Park would not, given the need to provide housing outside of the administrative boundary of Redditch. | | |
| Cross Boundary | 104/056 | Suggests that the provision of new retail facilities within a North West extension of Redditch would | There are no perceived constraints to the provision of new retail facilities in the form | No change. |

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| | | contribute to creating a sustainable development adjacent to the existing urban area, whereas the proposals at Bordesley would not address the issues identified in the Council's Retail Needs Assessment. | of a new District Centre at the site known as the North West SUE or Bordesley Park. | |
| Cross Boundary | 104/058 | Support for North West Redditch SUE with regard to its potential as a high quality, safe environment integrated into the existing urban environment. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/061 | Details surface water drainage issues and flood risk of Brockhill East, Brockhill West and Brockhill North, with measures for dealing with drainage successfully at each site. Concludes that in contrast to the WYG report which identifies foul water drainage as a potential issue with the North West SUE, | Further detail on flood mitigation measures would need to be investigated prior to any SUE allocation. | Re-draft cross-boundary elements of the Core Strategy. |

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| | | RPS finds neither foul water issues for the area nor any significant issues of water drainage that cannot be resolved through normal measures. Adds that discussions with Severn Trent Water have identified a sewer capacity issue but have offered a range of solutions. Furthermore it has been identified by Severn Trent that whilst flooding issues can be resolved at the SUE, the preferred option of Bordesley will not facilitate such flood alleviation. | | |
| Cross Boundary | 104/062 | Outlines support from FCPR and Worcestershire Wildlife Trust for development relating to the Brockhill area in terms of landscape, ecology and green infrastructure. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/063 | Promotes the North West Redditch SUE in terms of its ability to deliver | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core |

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| | | necessary employment land at different locations adjacent to existing employment sites and transport links and at different stages. The opportunity to provide employment uses and new housing will create a sustainable urban extension and will assist Redditch and Bromsgrove in delivering cross-boundary strategic employment requirements. | | Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 104/067 | Objects to the Key Diagram as it seeks to determine a location for growth outside of the Council's administrative boundary, which neither aligns with the proposals for Bromsgrove nor offers the most sustainable option. | This comment conflicts with the respondents other requests for Redditch Borough Council to determine a SUE boundary at the area known as North West Redditch outside the Borough boundary. The site boundaries and details regarding access of any SUE were not determined at the time of publishing the PDCS. Broad locations will be determined following further consultation. | Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross | 107/168; David | Opposes new housing in | See response to respondent | Re-draft cross-boundary |

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| Boundary | Rose | Webheath (ADR) and rather supports building at the Bordesley Park site. | No. 002/068. | elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 107/231; David Rose | Future housing should be developed at Bordesley Park - this will open up access to Abbey Stadium for much needed development. It is closer to the M42 and road systems and is more sustainable (Page 8, Second Stage Report). | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy.<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 108/170 | Argues that to build on Green Belt is a disgrace and asks whether there are not sufficient brownfield sites in Redditch to cover the required housing allocations. | The opportunities for any potential development within the Redditch urban area, on brownfield and greenfield site have been exhausted. The SHLAA details the sites with potential. From the Scoping Report stage it was clear that the amount of Brownfield sites | No change. |

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| | | | available to the Council would be limited. | |
| Cross Boundary | 111/175; Mr Hemming | Refers to the designation of open space when constructing the new town areas of Winyates, Matchborough, Woodrow and Church Hill leading to excessive infill of west areas to make up target shortfall. This development in gardens and creation of mini-estates overloaded infrastructure and destroyed existing communities. Believes new development should take place by infilling open spaces in the under-populated new town areas and designating these areas as brownfield sites for developers to focus on before any extension to the boundaries. | The opportunities for any potential development within the Redditch urban area, on brownfield and greenfield site have been exhausted. The SHLAA details the sites with potential. It is not appropriate to redesignate open space as brownfield land. | No change. |
| Cross Boundary | 112/177 | Opposes encroachment on the Green Belt. | The opportunities for any potential development within the Redditch urban area, on brownfield and greenfield sites have been exhausted. The | No change. |

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| | | | SHLAA details the sites with potential. | |
| Cross Boundary | 115/180 | Agrees with the majority of the Core Strategy with the exception of the possibility of building on land adjacent to Dagnell End Lane at Bordesley, unless this refers to the Bordesley by-pass which has previously been overlooked. | See response to respondent No. 002/068. Bordesley Bypass is likely to be an essential infrastructure addition to be required associated with any SUE to the north of Redditch. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council.<br><br>Update Key Diagram/Proposals to display intended location of Bordesley Bypass |
| Cross Boundary | 117/183 | Supports housing development at Bordesley Park. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 118/186 | Supports housing development at Bordesley Park. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy |

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| | | | | Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 119/188 | Expresses support for Bordesley Park as the most suitable site for future housing development, citing existing infrastructure, proximity to schools, expanding supermarket, recreational facilities and links to M42 as justification. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 120/190 | Expresses concern for the proposed growth of the Stratford-on-Avon and Bromsgrove districts situated by the green belt boundary for Redditch Borough because of the need to protect this land for environmental and conservational purposes. Believes preservation of land is equally as important as the growth and development of housing and | The need to develop in neighbouring Districts is determined by the WMRSS. Environmental concerns will be taken into account when determining the broad locations for cross boundary growth. | No change. |

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| | | employment in the Borough. | | |
| Cross Boundary | 121/191; Mr Barber | Supports the Core Strategy's plans for future housing development which satisfies the requirement that development should be located on existing A-roads and motorways to reduce any impact on the local community. | Agreed. This is also a consideration in the SA of all major and strategic development sites. | No change. |
| Cross Boundary | 122/193; R Best c/o Mr and Mrs Tolley | Suggests the opportunity for cross-boundary growth to the northwest of Redditch, as promoted by RPS. Landowners of the area that wraps around Brockhill wood offer their support for development in the area highlighting the area's potential for housing, a link road between the A448 and A441 and green buffers.<br><br>Oppose the preferred directions for growth, namely to the north of Redditch – Bordesley Park – as proposed in the White Young Green Report. This report is considered to be flawed in three | See response to respondent No. 002/068.<br><br>It is disappointing that the respondent has not recognised the Borough Council's efforts to consult as extensively as possible on its background papers and evidence base in addition to its formal Core | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council.<br><br>Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with |

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| | | respects. Firstly, the first stage study which fed into the final document was not available for consultation and therefore is deemed to have unreliable conclusions. Secondly, the study fails to recognise the proposal by RPS for the site at Northwest Redditch. Finally, the study demonstrates an inconsistency of approach between the preferred Bordesley Park site and other areas, particularly in application of Green Belt policy.<br><br>Whilst the Core Strategy insists on the requirement for Redditch-related growth across the administrative boundary, the WYG report is considered to fall short on tests of soundness. The Northwest Redditch proposal offers a suitable and deliverable option for housing development and should be considered for allocation. | Strategy drafts. As a background document, the Borough Council has no requirement to consult but has done so wherever practical. In addition, the actions taken as a result of the outcomes of WYG reports have always been subject to consultation in line with the SCI. See response to respondent No. 002/068.<br><br>The WYG report as a background paper has never been intended to be a DPD in its own right and is not therefore subject to 'tests of soundness'. The Core Strategy will rely upon an extensive evidence base justifying the preferred option. | Bromsgrove District Council.<br><br>No change. |

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| Cross Boundary | 123/195; Warwickshire County Council | Believes the Spatial Strategy Examination in Public is the correct forum for establishing the distribution of development beyond Redditch's boundaries.<br><br>Maintains that instead of the 50/50 split for growth between Bromsgrove and Stratford-on-Avon districts, designation of development outside of the borough should be based on sustainability principles, notably transport and accessibility. Any development to the east and southeast of Redditch will result in increased car-based trips through or around the urban area and would place additional pressure on the A435 through King's Coughton, Studley and Mappleborough Green. From a transport perspective therefore, development to the north of Redditch is preferred particularly given it proximity to the train | Agreed.<br><br>See response to respondent No. 002/068. | No change.<br><br>Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |

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| | | station and town centre. Similarly, if car journeys are made from the north of Redditch towards the conurbation they will have a much reduced impact on the urban area given their location on the A441 and A435. | | |
| Cross Boundary | 123/233; Warwickshire County Council | The Preferred Strategy takes into account the conclusions of the WYG Study and Policy SC1 makes provision for 2243 dwellings which is 1000 less that the RSS requirements. This has an effect on provision of Bromsgrove and Stratford which would be required to provide higher levels of housing. The supported and more sustainable growth areas are located in Bromsgrove rather than Stratford. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 129/202; Clive Wilson | Strongly opposes any major development occurring at Bordesley Park. Suggests a number of significant drainage and flooding issues affect the Dagnell | Further detail on flood mitigation measures would need to be investigated prior to any broad location being determined. Infrastructure | No change. |

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| | | Brook and River Arrow which can render the A441 at Bordesley, the A441 bridge over the River Arrow and Dagnell End Road impassable. Flooding of properties already occurs all too frequently. Refers to significant run-off problems affecting Batchley Brook, Red Ditch and Blacksoils. This is due to abnormally high rates of run-off from notionally undeveloped, soft, rural areas, probably due to soil saturation conditions, but the problem has worsened in terms of both frequency and magnitude. Although Batchley Brook is in part protected by a culvert, it has limited effect and requires improvement. Argues that the Borough's Foul Sewage network is also non-sustainable. Developments remote from the areas concerned are unlikely to be capable of funding an appropriate improvement strategy. Both Priest | requirements associated with the development of a Redditch/Bromsgrove SUE would contribute towards these improvements. | |

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| | | Bridge and Spernal sewage treatment works have an increasing number of pumped facilities which are not sustainable and, with the gravity options available, makes their continued use unjustifiable. | | |
| Cross Boundary | 132/205 | Concern about the housing options given to Redditch and the potential impacts on the green belt area between Redditch and Studley. Wishes to preserve the green belt areas around the village and to maintain the land between Studley and Redditch in order to prevent the urban sprawl of Redditch encroaching any further towards Studley.<br><br>Whilst there is no objection to the employment use designated for the Winyates Triangle, there is a need for a traffic strategy to avoid placing extra pressure on the A435 corridor. | Agreed based upon the Evidence Base. See response to respondent No. 002/068.<br><br>Agreed. The Borough Council intends to explore the potential of the Winyates Green triangle for a Diversity Park. A Transport Assessment has been commissioned to consider the potential access to the site. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council.<br><br>Re-draft cross-boundary elements of the Core Strategy |

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| Cross Boundary | 133/209; Ceridwen John | Suggests that the developments outlined for the north, and secondly the northwest, of the Borough are the most sensible ideas as they will benefit from better train links into Birmingham and preserve the open spaces in the south of the Borough. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 134/213; Mr and Mrs Haigh | Expresses support for development at Bordesley Park and Foxlydiate as these sites have more suitable access to the motorway network and local industry. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 135/215; Mrs Smith | Questions the need for all of the proposed housing and argues that new development will mean more industrial sites, schools etc which will take over the green spaces and some of the green belt. | Sites within Redditch should be developed first. A thorough search for sites as detailed in the SHLAA highlights a limited capacity within Redditch to deliver the houses needed to support the growing population, meaning that development on Green Belt land is inevitable. | Re-draft cross-boundary elements of the Core Strategy |

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| | | | There could also be a small loss of open space in the Borough. | |
| Cross Boundary | 135/216; Mrs Smith | Suggests that any thought of extending Beoley is totally abhorrent. | There is no suggestion to extend Beoley, although in Bromsgrove District, both Council's have agreed that this area is warranted to be excluded from consideration in the further consultation on development options. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE/to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 148/255; E Rose | Support building at Bordesley Park for development | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 149/258; S J Rose | Support proposals to build on land at Bordesley Park. Site is more sustainable and would be an ideal opportunity to develop the road structure in that area as well as the | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE |

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| | | much needed improvement of the Abbey Stadium (page 8 of Second Stage Report) | | to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 150/259; Mrs J Stowell | Support building at Bordesley Park | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 151/262; V Wilcox | Strongly object to proposed changes to green belt boundary. There are sites within Redditch's boundary that should be re-developed, for example near the fire station which should provide approximately 500 dwellings. | Agree that the sites within Redditch should be developed first. A thorough search for sites as detailed in the SHLAA highlights a limited capacity within Redditch to deliver the houses needed to support the growing population, meaning that development on green belt land is inevitable. | No change. |
| Cross Boundary | 152/264; M Rose | Bordesley Park is a more suitable location for development | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show |

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| | | | | the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 153/508; Centro | Redditch falls within the West Midlands 'journey to work' area and it is important that residents of any new development can have sustainable access to regional services and wider employment and education opportunities. Cross boundary issues should be given further consideration particularly in regards to Redditch railway and improved rail services. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 158/271; H Bonham | Given the identified need for further housing development, advocates development in the Bordesley Park area which has good potential links to local trunk roads. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 159/272; Mr and Mrs Sullivan | Fully support proposals for development at Bordesley Park. | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy |

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| | | This is because all the required development can be located in one area which limits disruption for Redditch residents. The infrastructure is also currently in place to support this development, reducing the redevelopment required to accommodate a new housing estate. A housing development in the Bordesley area will be beneficial due to the planned redevelopment of the Abbey Stadium. | | Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 160/277; R White | Green Belt should not be encroached upon for development. Countryside and Wildlife is needed. Infilling which has taken place in Redditch affects quality of life of residents and no more should be done. Overcrowding contributes to crime, anti-social behaviour and neighbour disputes. | Agree that the sites within Redditch should be developed first. A thorough search for sites as detailed in the SHLAA highlights a limited capacity within Redditch to deliver the houses needed to support the growing population, meaning that development on green belt land is inevitable. | No change. |
| Cross Boundary | 202/335; Tetlow King c/o | Concerned about any development of Bordesley Park to meet | See response to respondent No. 002/068. | Re-draft cross-boundary elements of the Core Strategy |

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| | Bromsgrove District Housing Trust and West Mercia Housing Group | Redditch's housing requirement on green belt land. Note that Redditch Borough Council seeks to deliver 4,430 dwellings in this location, which is over 1,000 more than envisaged by the RSS. Such an allocation is unlikely to make a meaningful contribution to meeting Bromsgrove's acute housing needs. | | Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 210/346; MFG Solicitors c/o various landowners | Willingness and support for land allocations at Foxlydiate Woods to meet future housing requirements for Redditch growth. Areas 1 and 3 have received developer interest. The land has considerable merit when considering future housing needs. The land abuts existing development at Webheath and it is envisaged that there would be no substantial infrastructure problems as it represents a logical extension to an existing built up development in a sustainable location with all available facilities including public | The housing requirements as set out in the WMRSS will be identified in the Core Strategy. Although beneficial, developer interest does not make any location more preferable than another as a location for future development. | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development. |

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| | | transport. | | |
| Cross Boundary | 261/404; Thomas Guise Ltd c/o various landowners | Land at Foxlydiate Woods - landowners willing to submit their respective parcels of land for consideration for residential development in areas 1 and 3. | The housing requirements as set out in the forthcoming WMRSS will be identified in the Core Strategy. | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development. |
| Cross Boundary | 262/412; HCA | A coordinated approach to cross boundary issues has not been arranged between local planning authorities involved. Two (Redditch & Stratford) appear to be pursuing a broadly similar strategy, but it is not clear that Bromsgrove Council also support the strategy. | See response to respondent No. 002/068. | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development.<br><br>Re-draft cross-boundary elements of the Core Strategy<br><br>Update Key Diagram to show the broad location of the SUE to be determined in collaboration with Bromsgrove District Council. |
| Cross Boundary | 262/414; HCA | An urban extension at Bordesley Park would require construction of the Bordesley Bypass and there is no certainty over whether funding | It is envisaged that the Bordesley Bypass would be an essential part of infrastructure provision to the north of the | No change |

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| | | will be available or when construction will begin. The infrastructure required to support the urban extension would have to be built from scratch. | Borough associated with any SUE; therefore work will continue to ensure its delivery. | |
| Cross Boundary | 262/415; HCA | Agrees that greenfield and brownfield land in Redditch in the SHLAA could deliver units quickly. There is risk that there will be a shortfall in the provision of new housing when supply from urban sites in Redditch begins to dry up and before the proposed new settlement at Bordesley Park delivers units | The WMRSS Phase Two revision Panel Report has indicated that there may be issues with the lead times for bringing forward large sites, therefore phasing will need to be carefully considered between the two Districts. | Re-draft cross-boundary phasing elements of the Core Strategy in conjunction with Bromsgrove District Council. |
| Cross Boundary | 267/575; Barton Wilmore c/o | WYG Report fundamentally flawed in that it has not assessed the ADR site within Redditch nor has it undertaken a comprehensive review of the Green Belt around Redditch. The report is not supported by robust landscape and visual evidence and caution should be exercised when using it. | Landscape character was given further consideration in the final revisions to the WYG conclusions. | No change. |

## *Delivery Strategy*

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| Delivery Strategy | 049/762 (WCC) | 1. Bordesley By-pass would need to be reviewed in the light of emerging WMRSS. If funding were available, the proposal would need to be supported by a technically robust business case that would have to be resourced, scheduled and managed by WCC and include identifying costs, benefits and funding. It would also need to meet local, regional and national policies | 1. Noted | 1. None |
| | | 2. Query what role was foreseen for WCC in addressing the indicator BE.3 (Landscape Character). WCC does not | 2. Officers understand that the new Landscape Character webtool at WCC enables the WCC landscape officers to track the use of the webtool with reference to planning | 2. None |

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| | | collect data on the percentage of planning permissions that would comply with RBCs landscape policy | application numbers. It is anticipated that RBC officers will request usage information from WCC landscape officers and supplement this with additional information from RBC DC officers | |
| Delivery Strategy | 049/762 (WCC) | 3. It would be useful to see the existing relationship of the County Historic Environment Service to RBC more strongly expressed within the Delivery Strategy. This would encourage greater recognition and use of its expertise. It is important to maintain timely consultation and advice on historic environmental issues as these may include a requirement for evaluation which can delay determination | 3. RBC officers have relied on HER for input into SHLAA site information. The SHLAA is updated annually and it is anticipated that involvement from HER will continue. Due to the restructuring of the CS layout, the Delivery Strategy will be re-worked prior to submission. Reference to HER could be included at this stage | 3. Include HER reference when Delivery Strategy is updated |

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| Delivery Strategy | 088/560 (Natural England) | 1. SP.3 – Sustainability Principles: West Midlands Sustainability Checklist could be used as a basis for monitoring policy compliance | 1. Officers will investigate the relevance of the West Midlands Sustainability Checklist to locally distinctive monitoring indicators | 1. Investigate the relevance of the West Midlands Sustainability Checklist to locally distinctive monitoring indicators |
| | | 2. BE.1 – Climate Change: Number of developments meeting BREEAM standards should be monitored | 2. Officers will investigate the possibility/ accuracy of monitoring BREEAM standards | 2. Investigate the possibility/ accuracy of monitoring BREEAM standards |
| | | 3. BE.2 – Flood Risk: Incorporate an indicator for the number of applications granted against the advice of the Environment Agency | 3. Noted. This information is readily available and could be recorded easily | 3. Consider incorporating an indicator for the number of applications granted against the advice of the Environment Agency |
| | | 4. H.2 – Primarily Open Space: Monitor permissions which deliver open space in accordance with specific standards. Delivery of green infrastructure should be monitored | 4. Compliance with open space standards forms part of the monitoring process | 4. Investigate the possibility/ accuracy of incorporating monitoring green infrastructure provision through the Green Infrastructure Study |
| Delivery Strategy | 088/560 (Natural England) | | A Green Infrastructure Study will be completed by Officers, | |

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| | | | the study will consider what Green Infrastructure is needed within the Borough and how the delivery of Green Infrastructure can be monitored | |
| Policy SC.7 - Infrastructure | 089/519 (Theatres Trust) | 1. Support this policy as it states that the key infrastructure requirements for development will encompass the CS Objectives and assume that cultural facilities will be included | 1. Noted | 1. None |
| | | 2. Although would not expect a long list of items, policy should be clear with respect to the relevant topics and suggest an overarching description of topics is used instead of a long list e.g. *"infrastructure that provides for the health, welfare, social, educational, leisure and cultural needs of the community".* This would ensure all topics were included | 2. Noted. It may be appropriate to describe the likely infrastructure provision in the pre-amble to the Delivery Strategy | 2. Consider description of infrastructure provision in Delivery Strategy pre-amble |

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| Delivery Strategy | 093/504 (Environment Agency) | 1. For SP.3 – Sustainability Principles, an example indicator could be the percentage of waste fully recovered rather than landfilled or sent through Civic Amenity sites. This could be further sub-divided e.g how waste has been put to use, energy generation, reprocessing into finished products | 1. Officers consider that it is possible to include these additional indicators provided that the Council's Waste Team are able to collect this information | 1. Confirm with Waste Management that this information is capable of being monitored and add to Delivery Strategy |
| | | 2. BE.2 – Flood Risk could include additional indicators for, number of planning permissions granted contrary to the advice of the EA on flood risk grounds; Number of additional and/or percentage of all new devt with SuDS | 2. Noted. Officers will consider inclusion of these indicators | 2. Consider inclusion of suggested indicators in Delivery Strategy |
| | | 3. BE.2 – Flood Risk, the Sequential Test should be added to the third indicator i.e. ... *unless complying with the sequential test and exception test (where required)* | 3. Noted. Officers will consider inclusion of this text in the indicator | 3. Include this text in the indicator |

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| Delivery Strategy | 102/155 (Worcestershire Archaeology Unit) | 4. It would be useful to see the existing relationship of the County Historic Environment Service to RBC more strongly expressed within the Delivery Strategy. This would encourage greater recognition and use of its expertise. It is important to maintain timely consultation and advice on historic environmental issues as these may included a requirement for evaluation which can delay determination | 4. RBC officers have relied on HER for input into SHLAA site information. The SHLAA is updated annually and it is anticipated that involvement from HER will continue. Due to the restructuring of the CS layout, the Delivery Strategy will be re-worked prior to submission. Reference to HER could be included at this stage | 4. Include HER reference when Delivery Strategy is updated |
| WYG2 | 104/012 (RPS) | 1. Report does not provide detailed information on the likely impacts of development and its suitability. Only provides broad brush, unqualified statements on each of the locations appraised. In some instances, only 3-4 paragraphs are provided to deal with the topics | 1. Officers consider that WYG1 assessed areas in and around Redditch for their suitability for long term development contributions towards Redditch related growth. The WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the | 1. Officers to consider capacities available within the ADRs and Green Belt to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period |

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| | | (outlined by RPS, pg.24) and in most cases do not have any regard to the issues required. Many comments also relate to out of date procedures or references | ADR findings in WYG1.<br><br>The EiP Panel identified all those localities where it considered that a Green Belt alteration was required or may be an appropriate response to seeking the most sustainable development patterns. Paragraph 4.18 states that once sites have been released from the Green Belt, the principle of their development has been established and it is unnecessary to test their sustainability further. This is reflected in Recommendation R8.2. | |
| Delivery Strategy | 104/036 (RPS) | 2. There are no clear arrangements for managing the CS. There is no clear deliverable housing trajectory within the CS or evidence base that can demonstrate the current | 2 & 3. WYG1 Study concluded that whilst planning up to its boundaries only, the ADRs offered suitable locations for development. However, the WYG2 Study concluded that land beyond the Borough | 2 & 3. Officers to consider capacities available within the ADRs to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period |

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| | | approaches are deliverable<br>3. There is a requirement for core strategies to be flexible and to demonstrate how they can accommodate changing circumstances. The CS cannot demonstrate this at the moment | Boundary offered more sustainable locations for development than the three ADRs.<br><br>The WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the ADR findings in WYG1<br><br>Further SHLAA work, in collaboration with the SHLAA Working Partnership, will gather landowner information on availability of sites which will in turn feed into the housing trajectory | Update Key Diagram to show the broad location of the SUE boundary to be determined in collaboration with Bromsgrove District Council<br><br>Update housing trajectory and include in Core Strategy |

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| Delivery Strategy | 104/036 (RPS) | | | |
| Delivery Strategy | 104/037 (RPS) | 4. It is not clear how the current and higher levels of housing will be delivered from a single proposal. The development and build out rates for such schemes have not been investigated to determine the practicality of delivering such sites | 4. Officers agree 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 | 4. Policy to be revised and to form part of the joint consultation with Bromsgrove in February 2010 |
| | | 5. Unclear from CS how housing within the administrative area will be delivered, in particular the urban areas. Strategy must | 5 & 6. See response to 104/036 above | |

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| | | establish how it will accommodate new homes should the urban capacity not come forward | | 5 & 6. See response to 104/036 above |
| | | 6. Spatial strategy proposed by RPS will enable the Council to demonstrate flexibility in achieving its housing requirements within its administrative area through use of the Brockhill ADR and Green Belt land at Foxlydiate as part of the lead-in to the SUE north west of Redditch. This is essential in demonstrating a flexible and deliverable supply of housing | | |
| Delivery Strategy | 104/037 (RPS) | | | |
| Delivery Strategy | 104/046 (RPS) | 7. PPS12, para 4.8 states that the Council is required to demonstrate, by way of evidence, what physical, social and green | 7. Limited information was available at this stage due to uncertainties regarding locations for development, however officers continue to | 7. Continued contact with infrastructure providers to progress Core Strategy infrastructure delivery |

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| | | infrastructure is needed to enable the amount of development proposed for an area, taking account of its type and distribution. The current approach for the extension of Redditch includes no reference to any infrastructure requirements associated with such a significant element of its strategy and is therefore unsound | meet with infrastructure providers to progress Core Strategy delivery | |

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| Delivery Strategy (SC.4 – Sustainable Travel and Accessibility, Principle means of Implementation 4, p.119) | 217/358 (Network Rail) | Page 119 refers to the Redditch Branch enhancements. Would like to see the following added to the table:<br>1. Add Network Rail to 'Lead & Key Partners' column as Network Rail is leading the development phase and currently funding the entire project<br>2. Alter 'Timescale' from 'ongoing' to "Completion is scheduled before the end of Control Period 4 'up to 2014' "<br>3. In 'Target' column, the percentage is 5%, as GRIP 2 is nearly complete (Guide to Railway Investment Projects) | Noted | The additional text suggested by Network Rail to be included in Delivery Strategy table where appropriate |

## *Design and Safety*

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| CS. 1 | 021/ 079 | Policy CS.1 generally accords with the relevant parts of emerging WMRSS policies SR1, SR2 and SR3. | Comment noted. | None. |
| CS. 1 | 028/ 105 | Support approach of Policy. | Support noted. | None. |
| CS. 1 | 029/ 706 | Support Policy. | Support noted. | None. |
| CS. 1 | 042/ 469 | Clause (i)<br>Do not consider it is the role of policies in the Core Strategy to enforce the application of the Building for Life Standards since it is not mandatory for developers to obtain a Building for Life Award. These standards cannot be enforced, particularly where they have not been the subject of rigorous testing through the RSS procedure and other development plan consultation as to their applicability. | It is considered that new buildings and developments in Redditch should aim to be a sustainable and as well designed as possible. The Building for Life Standards cover a range of sustainability issues and is therefore considered important. Officers within Redditch Borough Council are trained to assess new developments against this standard and therefore can apply it to new developments.<br><br>The West Midlands Regional | None.<br><br>None. |

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| | | | Spatial Strategy Phase II Revision Preferred Option contains Policy SR3 'Sustainable Design and Construction' which states that all new housing developments must meet CABE Building for Life 'silver' standard and that all medium and large scale developments (greater than 10 residential units) meet the 'very gold' standard. | |
| CS. 1 | 091/ 135 | Disappointing that the policy does not go any further than the provisions of the existing Supplementary Planning Document 'Designing for Community Safety' (Dec 2006).<br><br>The provisions of Policy CS. 1 essentially ensure that a development scheme | The requirement for medium and large developments to meet Building for Life 'gold' standards is a new concept. However there is no justification for any addition standards to be achieved, so they cannot reasonably be expected.<br><br>Noted. | None.<br><br>Noted. |

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| | | incorporates 'Secured by Design' principles. However, whilst the inclusion of design measures to reduce the opportunities for crime will assist in delivering sustainable communities, they will not remove all crime and disorder activity. There will remain a key role for the West Mercia Constabulary (WMC). | | |
| | 091/ 137 and 137b | New commercial development and developments such as bars and clubs should incorporate 'Secured By Design'. | Achieving the 'Secured by Design' Principles is referenced in the High Quality and Safe Design Policy and is therefore encouraged as part of new development. | None. |
| Policy CS.1 | 262/ 410 | Support for Policy. | Support noted. | None. |
| Policy CS.1 | 085/ 524 | Support for Policy. | Support noted. | None. |
| Policy CS.1 | 088/ 541 | The need for open space to be and feel safe is recognised within the justification, but not within the policy itself. It is recommended that the policy includes a requirement for | Noted. It is considered that it is appropriate to consider the design and integration of open space | |

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| | | proposals to consider the design and integration of open space. | | |
| Policy CS.1 | 263/ 437 | Welcome this policy, particularly criterion (iii). | Support noted. | None. |
| | 103/164(f) | An attractive feature of the town is the architectural details on the fronts of many of the Victorian houses, using sculptured brickwork. There should be a policy preserving this feature along with houses of architectural interest. | This kind of requirement would be more appropriate within a Development Control and Policies DPD, it would not be appropriate for the Core Strategy. | None. |

## *Development Strategy*

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Policy SP.2 – Development Strategy | 021/073 (WMRA) | Policy generally accords with emerging WMRSS Policy CF4 (Phasing of new development) but should address the | Discussions with the SHLAA Working Partnership concluded that a windfall allowance should be excluded from the | Consider inclusion of the approach to windfalls in the Delivery Strategy preamble in accordance with |

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| | | approach to be taken to windfalls in line with CF4D and CF10B (Managing housing land supply) | first 10 years of the Plan to ensure robustness and conformity with PPS3. This will be reflected in the April 2010 SHLAA refresh. Only brownfield historic windfall trends will be taken into account to avoid an unrealistic expectation for greenfield development i.e. barn conversions which form part of past trends but which may already have been depleted and should rightly be excluded from future trends analysis | recommendations in the EiP Panel Report (September 2009) and SHLAA refresh |
| Policy SP.2 – Development Strategy | 042/468 (Stoneleigh Planning) | 1. Agree strategic sites should be regarded as immediately available. Important in relation to the development of land at Bordesley because of the sustainable and necessary contribution the site will make towards meeting the Borough's needs | 1 & 3. It should be noted that the Redditch CS does not include provisions for the development of land at Bordesley. This site is in the Bromsgrove DC administrative area and as such, sites to meet the needs of Redditch related growth will need to be addressed in the Bromsgrove CS. Officers continue to work closely with officers from neighbouring authorities and it | 1 & 3. Reference Redditch related growth split between neighbouring authorities |

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| | | | is anticipated that joint consultation with respect to Redditch related growth options will commence February 2010 | |
| Policy SP.2 – Development Strategy | 042/468 (Stoneleigh Planning) | 2. Consider it unlikely that sites within the urban area will consistently deliver 330 dwellings per annum between 2006-2013. Therefore programmed release of important greenfield site (i.e. Bordesley) should not be programmed for release in the second part of the plan period. It will need to contribute to the provision of new homes from 2011 onwards | 2. PPS3 stresses that LPAs should set out a housing implementation strategy to deal with the managed delivery of housing. Work with relevant stakeholders has began on this in autumn 2009 | 2. Work to continue on Implementation Strategy with key stakeholders from autumn 2009 |
| | | 3. Object to wording to the final part of Policy SP.2 and consider that it should be revised as follows: *"Land at Bordesley/Bordesley Park will be developed for housing and employment throughout the plan period.* | 3. Following receipt of the EiP Panel Report, the identification of Bordesley Park in the WYG 2 Report was regarded as too | |

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| | | *The scale of the development, the range of uses and the necessary supporting services and infrastructure are such that the development of this land will need to commence during the early phases of the plan period to ensure the continuous delivery of new homes to meet the needs of Redditch over the period to 2026"* | inflexible to deliver Redditch related growth in Bromsgrove District and greater flexibility in terms of achieving and maintaining housing output could be provided through parallel pursuit of a number of development options. As such, joint consultation between Redditch Borough and Bromsgrove District Councils will take place from February 2010 to explore development options to accommodate its part of the housing target and employment targets. | 3. None |
| Policy SP.2 – Development Strategy | 042/468 (Stoneleigh Planning) | | | |
| Policy SP.2 – Development Strategy | 049/730 (WCC) | 1. Policy appears to address the phasing of housing development rather than | 1, 2 & 3. Prior to submission of the CS, officers will continue to re-structure its format. It is | 1, 2 & 3. Continued work on Delivery Strategy and the CS revised format |

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| | | the development strategy<br>2. First paragraph could cross refer to the strategic sites policies<br>3. Second paragraph could be amended to make it clear that it applies to non-strategic sites | considered that the Delivery Strategy pre-amble will more fully address the development issues facing Redditch Borough. Policies will be re-worded and 'shuffled' from current locations in the PDCS to new locations under the most appropriate sub-strategy. It is considered that this will be an appropriate location to address, et al, phasing, windfalls, delivery rates and cross references to strategic sites | |
| Policy SP.2 – Development Strategy | | 4. Final section of policy should be reworded as appears to be incomplete<br>5. This would seem to be the most logical place to include approach to windfalls having regards to emerging WMRSS Policies CF4D and CF10B<br>6. Second paragraph of RJ | 4. Noted<br>5. See 1 above<br>6. See 1 above | 4. Consider wording of final paragraph in policy<br>5. See 1 above |

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| | 049/730 (WCC) | should be clearer as to what the purpose of an SPD will be. CS provides no guidance as to required rates of delivery and should be rectified | | 6. See 1 above |
| | | 7. With respect to final two paragraphs of RJ, it does not necessarily follow that objective d (WMRSS Spatial Strategy Objectives) allows for the inclusion of the ADRs as Green Belt | 7. Following receipt of the EiP Panel Report, the Bordesley Park identification in the WYG 2 Report was regarded as too inflexible to deliver Redditch related growth in Bromsgrove District and greater flexibility in terms of achieving and maintaining housing output could be provided through parallel pursuit of a number of development options. The Panel recommended that land for 4000 dwellings should be identified within the Borough boundary. As such, joint consultation between Redditch Borough and Bromsgrove District Councils will take place early in 2010 to consider development options for Redditch related growth and | 7. Consider future use of ADRs and other options to meet the revised EiP Panel recommendation for the housing target of 4000 dwellings within Redditch Borough |

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| | | | the contribution of other sites, including the ADRs within Redditch Borough | |
| Policy SP.2 – Development Strategy | 088/533 (Natural England) | 1. Broadly support proposed development hierarchy provided that brownfield land is not of value for biodiversity and/or open space. Each location should be judged on its own merits with decisions informed by a robust evidence base. Appropriate policies should be put in place to ensure that valuable brownfield land is protected from development | 1. Officers agree with these comments. There are brownfield sites within Redditch which have been scrutinised and afforded protection from development due to the contribution made to the townscape/landscape in their present state. It is anticipated that this level of scrutiny and protection will continue on a site by site basis or through SHLAA/ ELR updates. Officers will give consideration to the inclusion of brownfield protection criteria in Policy SC.2 – Efficient use of land | 1. Consider revising wording in Policy SC.2 to protect brownfield land with biodiversity/ open space value |
| Policy SP.2 – Development Strategy | 091/130 (Atisreal) | WMC consider that the most sustainable sites are those where there is sufficient funding to deliver the required infrastructure to support the sites. If there is not then contributions from development | The Infrastructure Delivery Plan will demonstrate costs needed to deliver the infrastructure required for the sites. This information will feed into a future CIL document. | Add the following paragraph to Policy SP2;<br>'***In all cases, the suitability of sites to be brought forward for development will be tested against the provisions of Policy SC7 –*** |

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| | | are justified as per the tests of the Circular 05/05.<br><br>WMC suggest that the following extra paragraph be added to Policy SP2 as follows;<br><br>'In all cases, the suitability of sites to be brought forward for development will be tested against the provisions of Policy SC7 – Infrastructure to ensure compliance with the objectives of the core strategy'. | | ***Infrastructure to ensure compliance with the objectives of the core strategy'***. |
| Policy SP.2 – Development Strategy | 093/489 (Environment Agency) | 1. Support policy reference to other policies within the plan such as infrastructure, flood risk and contaminated land. However, would place emphasis on the need for the timing and phasing of sites for development to have been informed by flood risk and environmental infrastructure requirements (WCS & SFRA will provide evidence for this) | 1. Strategic sites have been the subject of additional scrutiny through mechanisms such as the SHLAA, WCS and SFRA. Any obstructions to their successful development in a timely manner would have been identified and included in strategic site policy | 1. None |

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| | | 2. Where contaminated land may be an issue, this should be addressed at an early stage as there may be negative effects for the environment. Also, there may also be time and financial implications on any regeneration project. This approach is essential to ensure the protection of controlled waters (Surface and groundwaters) | 2. This has been addressed in Policy SP.3 of the PDCS | 2. None |
| Policy SP.2 – Development Strategy | 093/489 (Environment Agency) | 3. Note that policy favours development of brownfield sites over greenfield sites. Suggest that reference is made in the policy for the need to consider the SFRA & WCS which will inform the siting as well as the phasing of sustainable development | 3. This issues has been addressed in Policy SP.3 of the DPCS | 3. None |

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| Policy SP.2 – Development Strategy | 202/330 (Tetlow King) | 1. Object to policy. Rigid phasing policy fails to take into account the current economic circumstances and the difficulty of bringing forward sites in a strictly phased manner. The use of the word 'must' in the second paragraph is inappropriate as it is not within the Council's control to enforce the order in which sites come forward. That this is the case is obvious from the lack of explanation as to how this could practically be achieved | 1. PPS3 stresses that LPAs should set out a housing implementation strategy to deal with the managed delivery of housing. Work with relevant stakeholders will begin on this in autumn 2009. 'Must' may be inappropriate is this context | 1. Work to commence on Implementation Strategy with key stakeholders autumn 2009. Consider revision to policy wording in para 2 |
| | | 2. Consider it appropriate for policy to include third and forth categories of development namely allocated sites for 100% affordable housing and the rural exception schemes permitted under Policy BE.7 (Exceptions Housing at Astwood Bank and Feckenham) | 2. Policy SP.2 details the broad phasing order and further reference to 100% affordable housing and rural exception schemes is not considered appropriate in this policy. Rural exception sites are dealt with in Policy BE.7. Affordable housing is dealt with in Policy SC.3, however further reference to sites for 100% affordable housing could be considered for inclusion in Policy SC.3 | 2. Consider policy reference in SC.3 to sites for 100% affordable housing coming forward in advance of the settlement phasing in Policy SP.2 |

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| Policy SP.2 – Development Strategy | 202/330 (Tetlow King) | 3. Second and third paragraphs should be reworded to allow for the timely release of land for affordable housing development to come forward in Green Belt locations. Only permits such development on exceptional basis once other sites have been exhausted. This is overly restrictive; the proposed approach would not be effective in tackling housing needs as required by Strategic Objective 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) | 3. Officers recognise 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 | 3. Consider wording of Policy SP.2 to allow for development to come forward on sites currently designated as Green Belt in a manner which will not be to the detriment of development in the urban area on brownfield and greenfield sites |

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| Policy SP.2 – Development Strategy | 262/406 (HCA) | 1. Broadly supports the policy as it seeks to promote sustainable patterns of development. Suggest that policy is changed to include field land, but not green belt land, adjacent to Redditch urban area as a potentially suitable alternative to brownfield and greenfield land within a defined settlement<br><br>2. Greenfield land outside the urban area of Redditch should be preferable to Green Belt land outside the urban area | 1 & 2. It is evidenced in previous planning documentation relating to the Borough of Redditch Local Plans 2 & 3 that the three ADRs had potential for development. It should be noted that during previous plan preparation, officers were restricted to searching for appropriate and suitable land for development within the Borough's administrative boundary only. The three ADRs offered the most appropriate locations for development at that time. Changes to the planning system have allowed for cross-boundary investigation for sustainable locations for Redditch related development. WYG1 dismissed Redditch's rural south west as unsuitable for development and WYG2 concluded that land beyond the Borough Boundary offered more sustainable locations for development than the three ADRs. | 1 & 2. See 049/730 above<br><br>Update Key Diagram to show the broad location of the SUE boundary to be determined in collaboration with Bromsgrove District Council |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Policy SP.2 – Development Strategy | 262/406 (HCA) | | Following receipt of the EiP Panel Report, the Bordesley Park identification in the WYG 2 Report was regarded as too inflexible to deliver Redditch related growth in Bromsgrove District and greater flexibility in terms of achieving and maintaining housing output could be provided through parallel pursuit of a number of development options. The Panel recommended that land for 4000 dwellings should be identified within the Borough boundary. As such, joint consultation between Redditch Borough and Bromsgrove District Councils will take place early in 2010 to consider development options for Redditch related growth and the contribution of other sites, including the ADRs within Redditch Borough | |

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| Development Strategy | 263/434 (English Heritage) | 1. The preferred direction for future growth as shown on the key diagram should be more clearly highlighted in this section | 1. Officers consider that it is inappropriate to include more detail on development beyond its administrative boundary in the CS. Officers will continue to work closely with neighbouring LAs to ensure correct and adequate reference is made in their Core Strategies to reflect the RSS with respect to Redditch related growth | 1. Continue to work closely with neighbouring LAs on matters relating to Redditch related growth beyond the Borough boundary |
| | | 2. Based on the information presented, principally the Study of the Future Growth Implications of Redditch, main comment with respect to the Bordesley Park proposal is the need to link any major development here to securing benefits for the surrounding environmental resources including Bordesley Abbey SAM which In turn will contribute to the Borough's green infrastructure and recreational and cultural infrastructure | 2. Benefits for surrounding environmental resources would be secured through S106 and/or CIL policy. The Development Strategy does not need to address this issue | 2. None |

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| Policy SP.2 – Development Strategy | 264/445 (CBRE) | 1. Support the promotion of the most sustainable sites and the request for those sites to be developed earlier in the CS period | 1. Noted | 1. None |
| | | 2. Consider that criterion i should be amended to refer to brownfield sites within the 'urban area' [as opposed to brownfield sites within a defined settlement] | 2. On receipt of the EiP Panel Report, the Panel recommended that land for 4000 dwellings should be identified within the Borough boundary. As such, contribution of other sites, including the ADRs and Green Belt land within Redditch Borough need to be considered to meet the housing target. Consequently, the wording of this policy will need to be revised to reflect the timely contribution of these sites | 2. Consult on revised policy wording early 2010 |
| | | 3. Suggest that policy includes the requirement for new development to be focussed in accessible and sustainable locations | 3. With respect to the findings of the 'Accessibility Study and Settlement Hierarchy', officers consider that the 'defined settlements' referred to in the policy offer the most focussed | 3. None |

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| | | | and sustainable locations for development | |

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| Policy SP.2 – Development Strategy & Policy SC.1 – Housing Provision | 267/574 (Barton Willmore) | 1. Development Strategy proposes delivery of only 2243 dwellings within Redditch which is 1057 short of the emerging requirement for the Borough<br>2. 2006 base projections increases the requirement for dwellings in Redditch to 8000. As a former New Town, Redditch should continue to fulfil such a function in the North Worcestershire area and as merited by its proposed status as SSD in the emerging WMRSS<br>3. Development and investment should be directed towards the town<br>4. An increase in the number of dwellings to be provided within the Borough will ensure Redditch can meet its own local housing needs | 1, 2, 4, 5, 6 & 7. See 262/406 above<br><br>3. Officers consider that the CS does indeed direct development and investment towards the town | 1, 2, 4, 5, 6 & 7. See 049/730 above<br><br>Update Key Diagram to show the broad location of the SUE boundary to be determined in collaboration with Bromsgrove District Council<br><br>3. None |

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| Policy SP.2 – Development Strategy & Policy SC.1 – Housing Provision | 267/574 (Barton Willmore) | 5. Strategy is flawed and unsound. Strategy requires the agreement of the adjoining authority<br>6. There are no significant environmental or physical constraints to the achievement of the WMRSS Preferred option figure of 3300 dwellings Redditch<br>7. Disagree with the conclusions of WYG2 on the suitability of using safeguarded land to meet this target to be delivered within<br>8. Inconsistency of policy wording. First line of policy states that Strategic Sites can come forward immediately. Second sentence makes reference to a phasing proposal under which brownfield sites come forward before greenfield sites. As the phasing | 8. Noted | 8. Policy rewording to be considered |

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| | | element refers to proposals for residential development, which would include some Strategic Sites, further clarification is required within the policy to determine whether Strategic residential sites can come forward immediately or whether they are restricted by phasing | | |

## *Enterprise and Skills*

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Policy ES.2 | 024/111 | Support for Employment in the Town Centre. | Noted. | No action required. |
| Policy ES.2 and Policy ES.6 | 103/163 | The 50,000 sq. m gross comparison floor space detailed in Policy ES.6 should take precedence over the 45, | The WMRSS requires Redditch Borough Council to plan for the construction of 45, 000 sq.m of new office floor space within or | No action required. |

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| | | 000 sq.m floor space detailed in Policy ES.2. | on the edge of the town centre. In addition, Redditch Borough Council is also required to plan for the construction of 50, 000 sq.m of retail floorspace within the town centre. The draft Office Needs Assessment determines that the 45, 000 sq.m is not appropriate and a 30, 000 sq.m figure would be more appropriate. However both of these land use requirements need to be planned for. Policies ES.6 and ES.2 of the Preferred Draft Core Strategy incorporated the retail and revised office figures. The Council currently has no evidence to justify any preference for which of the figures should be prioritised. | |
| | | In order to accommodate the Office requirement 10 new Town Halls would be needed, therefore "does the policy imply | Officers of the Council in association with appointed planning consultants have carried out a draft Office Needs | The draft study proposes a revised office requirement of 30, 000 sq m, of which the town centre can accommodate |

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| | | the raising of these communities to the ground?" | Assessment to identify appropriate locations for new office development in, or on the edge of, the town centre. The policy is not intended to raise the community to the ground, rather it is hoped that the policy will enhance and develop the community as a place to live and work. | 22, 000 sq. m; consequently the policy will need to reflect the findings of this study. *Extract from revised Core Strategy policy: "*Based on a local assessment, the Council aims to deliver 30, 000 sq.m of office development for the town centre". |
| | | If half of the office workers came by bus and the other half by car this would mean that there would need to be development to the equivalent of car parks 1, 2 and 3. | In terms of specific car parking requirements for Offices, these are as follows:<br>• For developments of up to 2500 sq.m. GFA – 1 space per 25 sq.m. GFA.<br>• For development over 2500 sq.m. GFA – 1 space per 30 sq.m. GFA.<br>There are additional car parking requirements for disabled, cycle, motorcycle and | No change to policy. |

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| | | | lorry/coach parking (if necessary), however these are considered to be minimal in the context of the total car parking (these requirements can be supplied upon request).The purpose of locating development within the town centre is because it is considered sustainable due to the variety of modes of transport that access the town centre e.g. buses, trains etc. As a consequence of its accessibility, transport links and the car parking requirements outlined above, there would be no need for such intensive car parking to cater for any new office development. | |
| | | [Office] Employers do not want to be located in the Town Centre, due to high rates and high rents. There would be an | This representation does not provide any evidence that this is the case. The draft Office Needs Assessment does not | No change to policy |

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| | | impact on local shops due to the increased number of Office workers moving through the Town Centre who may jostle the shoppers. | identify that office employers do not want to locate in the town centre. In addition to this the draft Office Needs Assessment and Town Centre Strategy do not provide any indication that an increase in offices would result in shoppers being jostled. The need to deliver Office development to create vital and vibrant Town Centres is a National and Regional Planning Requirement. | |
| | | The Strategy should reflect the type of Offices that Redditch is suitable for, e.g. Headquarters. | Officers agree with the concept of this representation, however given how fast the economy changes, it is not considered appropriate to be defining the type of office development that is required. Both the Preferred Draft Core Strategy and the Redditch Economic Development Strategy (REDS) do, however, make reference | Rewrite policy, making reference to the REDS, specifically referring to how the Council is aspiring to grow the local economy. |

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| | | | to the need for High Technology Development in the Borough. The REDS is a document that can be modified efficiently to reflect the changing economy, consequently the Core Strategy should make reference to this document and ensure the detail in the REDS is acknowledged and implemented by decision makers. | |
| Sustainability Objectives | 103/164b | The requirement for a knowledge based economy does at least identify land for new enterprises, but it fails to say how and where the education facilities will be established, other than mention discussions with appropriate bodies. The DPD needs to go further, identifying land for high quality offices and for an appropriate learning centre. | The Employment Land Review identifies sites for employment purposes, these sites have been designated to meet the economic requirements of the Borough i.e. they should be suitable for the type of uses the Council set out in the forecasting stage of the Employment Land Review. A draft Office Needs Assessment has been prepared which will | No change to policy. |

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| | | Without this is will be difficult to attract the necessary investments. | identifies sites in the town centre to meet the 30, 000 sq.m requirement set out in the assessment. In relation to the point made regarding the learning centre, the Core Strategy is considered flexible enough to allow for a 'learning centre' or a higher education establishment to be developed. The allocation of sites can be considered when preparing the Site Allocations and Policies DPD. | |
| Land to the Rear of Alexandra Hospital | 016/070 | Concerned about any potential development on the Land to the Rear of Alexandra Hospital or Wirehill Wood, as previous housing development has had detrimental impact on scrub/grassland habitat, and potential loss of open space. | The Employment Land Review emphasises the need for some of the Land to the Rear of Alexandra Hospital to be used for Office development. However, in order to be compliant with the WMRSS, a maximum of 5000sq.m. of B1 use can be provided at this location. Therefore the Employment Land Review | Rewrite the Land to Rear of Alexandra Hospital to take account of the suggestions contained within the Employment Land Review. *Extract from revised Core Strategy policy* "The Borough Council will issue a Supplementary Planning Document to guide the development of this site." |

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| | | | suggests that additional research be undertaken on this site to identify an approach in terms of additional mixed uses. This work will need to account for impacts on the scrub/grassland and wider impacts e.g. the impact on current housing in the area. However the Employment Land Review does not include the Primarily Open Space within the potential development site. Officers would also point out that the principle for development on this site has been established in this location in previous Local Plan documents. | |
| Development of new factories | 160/275 | New factories should not be developed as there are current ones vacant and being re-developed as housing. | It is accepted that certain industrial units in the Borough have been redeveloped for housing. However it is not considered a sustainable argument that the future | No change to policy. |

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| | | | development of factories should not be planned, as it is necessary to the successful growth of the Borough that future provision is identified. There is a positive correlation between the provision of future housing and the need for employment development to cater for housing growth, such that as housing increases so does the need for employment. In addition, both the Council's Employment Land Review and the REDS seek to influence the economy of the Borough by setting out the direction of economic growth. The current, redundant factories do not necessarily suit the type of future uses that are being planned for the Borough and the current market requirements do not necessarily meet the current stock of facilities, therefore new | |

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| | | | factories are needed. | |
| Land to the Rear of Alexandra Hospital | 199/321 | The Core Strategy does not appropriately define the land ownership for the Land to the Rear of Alexandra Hospital; it is correctly labelled in Stage 3 of the Employment Land Review.<br><br>The Trust supports the Statement in Stage 1 of the Employment Land Review which states that employment is not the only suitable use on the site. | Officers concur with this point.<br><br>The Employment Land Review states "Although there is an identified need for offices through the projections set out in stage 2, it is considered more suitable at this point to recommend that the site be progressed as a mixed use development encompassing office development. As a consequence further investigation of this site is required".<br>It is anticipated that the site will | Change the Core Strategy to reflect the Employment Land Review. *Extract from revised Core Strategy policy context*<br>"The site is within the ownership of the Secretary of the State for Health, Worcestershire NHS Trust and Redditch Borough Council"<br><br>Officers to progress this work to identify appropriate future uses for Land to the Rear of Alexandra Hospital. This work should also take account of any other evidence that is produced, which will assist in identifying potential future land uses for this site. |

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| | | | constitute a mix of uses including offices and housing. | |
| Land to the Rear of Alexandra Hospital | 199/323 | The Trust does not support the statement in the Core Strategy which states that the site should be developed as B1 use. The Trust adds that the policy in the Core Strategy is at odds with the Employment Land Review which advocates a mixed use development. | Officers concur with this point. | The Core Strategy to be updated to take account of the Employment Land Review. *Extract from revised Core Strategy policy* " To deliver significant housing and employment land requirements, proposals for this site must:<br><br>1. encompass a minimum of 5000 sq.m of high quality B1 only development, which constitutes office (other than that classified in A2);<br>2. provide a comprehensive housing scheme on the land to level of development identified in the Borough Council's Strategic |

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| | | | | Housing Land Availability Assessment (i.e. 65% of land mass is developable)" |
| Land to the Rear of Alexandra Hospital – Policy SP.8 | 224/367 | B1 office development of the site is unrealistic for the whole site. In order to be compatible with the hospital use, any employment development would have to be high class B1 use, although the site location does not suit this. The site should be reallocated to meet residential uses. | Officers do not consider that the whole of the site should be reallocated to meet residential uses. It is more likely that a mix of uses will be incorporated on the site with a mix of housing and employment. | As above. |
| Policy ES.1 | 027/476 | Highways Authority are concerned about employment development located along major transport routes such as the A441 and A435, where these are not in easy reach of residential communities, where there is not high quality public transport and where there is not the infrastructure to encourage walking. | The Core Strategy does not set out every future employment site. However it is likely that both the A441 and A435 would be close to residential communities. It is also anticipated that there would be access to high quality public transport and infrastructure to encourage walking especially as these are likely to be | Where sites are being progressed, Officers will consult with the Highways Authority, and any other relevant body, regarding the most appropriate way to bring these sites forward. |

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| | | | located near the major development areas. | |
| Policy BE.6 | 049/743 | The ongoing Historic and Farmstead Survey by Worcestershire County Council will provide assistance informing policies on the protection and conversion.<br><br>It is not clear what the policy is referring to with regards to neither retail development nor new development. | Officers agree with this point.<br><br>Officers consider retail development to mean any form of development that falls under A1 use. In terms of new development this is defined under the 1990 Town and Country Planning Act as "the carrying out of building, engineering, mining or other operation in, on, over or under land, or the making of any material change in the use of any building or other land." Most forms of development require planning permission (see also "permitted | Officers to liaise with Worcestershire County Council in order to assist with policy development in this area.<br><br>No change to policy. |

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| | | | development"). | |
| | | Biodiversity needs referencing in the policy, and ecological enhancement should be incorporated into building design. | Officers agree that biodiversity and ecological enhancement are elements that should be considered within planning policy. However Officers would emphasise that there is a need to be careful not to repeat other elements of policy that is cited elsewhere. | No change. |
| | | There is a typing error on page 63 (RJ) regarding the use of the word beneficial. | Noted. | Officers to amend typing error. *Extract from revised Core Strategy policy context* "that there are no beneficial or harmful effects on town and village vitality, and that it does not undermine any other aspects of the rural economy" |
| Policy SP.8 | 049/733 | It is welcomed that the policies recognise the ecological value of the site. | Noted. | No change to policy. |
| Policy ES.1 | 049/746 | Policy ES.1, iii. should be reworded as follows "in all | Officers concur with this representation. | Officers to re-write policy *Extract from revised Core* |

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| | | cases, development should be acceptable in terms of their impact on biodiversity and the wider environment and demonstrate adequate infrastructure including Green infrastructure."<br><br>Waste management facilities should not be excluded from future employment land provision, it should also be noted that it does not fall within one specific use class. Therefore specific reference could be made to waste management in order to ensure necessary development is not ignored. | <br><br>The Core Strategy does not make reference to the exclusion of waste management from future employment land provision. The Employment Land Review, which contains the detail on potential future employment site allocations, simply sets out the most suitable type of land use class for that site, but does not make specific reference to any particular facilities. In relation to waste management falling under different use classes, Officers acknowledge this point. It is considered | *Strategy policy* "In all cases, development should be acceptable in terms of their impact on biodiversity and the wider environment and demonstrate adequate infrastructure including Green infrastructure"<br><br>Make reference waste SA objectives in the policy. |

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| | | | appropriate to make reference to the waste SA Objective in order to draw attention to the issue. | |
| | | The key factor is to ensure pollution is minimised, and amenity is protected, this should be a key factor in the Core Strategy, rather than a focus on use classes. | Officers agree that this is a key factor that should be considered in the Core Strategy. Indeed a reference to the Air Quality Strategy in the policy. In terms of amenity, this is covered in a number of areas within the Core Strategy, for example Policy H.2 'Primarily Open Space'. These factors should also be a consideration in the determination of a planning application for employment purposes and therefore Officers do not consider it appropriate to repeat policy information. In terms of use classes that are referred to in the policy, Officers consider that these are appropriate, | Make reference to Air Quality Strategy in Policy. |

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| | | | although the policy is being reviewed as a result of this consultation. | |
| Land to the Rear of Alexandra Hospital | 017/242 | CPRE remain in objection to employment building at this location. It is a sensitive area both at the hospital and the SSSI wood, the RJ does not cover the adjacent locations to land identified at Land to the Rear of Alexandra Hospital. | The Employment Land Review has initially assessed the site and comments were received regarding the environmental sensitivities in the area. However policy regarding Land to the Rear of Alexandra Hospital needs to be reviewed as part of this consultation. At this stage Officers do not consider that there has been sufficient information provided that should rule out the Land to the Rear of Alexandra Hospital site out for future development. The principle of development at this site has been established in previous Local Plans. | No change to policy as a result of this representation. |
| Policy ES.4 | 017/245 | CPRE agrees with items a, b & c in Part ii of this policy. | Noted. | No change to policy. |
| Policy SP. 8 | 021/078 | Generally accords with SR2. It also generally aligns with PA6A | The Employment Land Review states that there is a need to | Officers to progress this work to identify appropriate future |

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| | | and PA13B, however the need for development would also have to be demonstrated in line with PA13B. | carry out further site investigation for the Land to the Rear of Alexandra Hospital. The draft Office Needs Assessment identifies the need to identify some town centre office needs outside of the town centre due to limited capacity in the town centre. However further consideration of potential sites to meet this need is required. It is anticipated that the Land to the Rear of Alexandra Hospital development proposal will constitute a mix of housing and employment. | uses for Land to the Rear of Alexandra Hospital. *Extract from revised Core Strategy policy* "To deliver significant housing and employment land requirements, proposals for this site must:<br><br>1. encompass a minimum of 5000 sq.m of high quality B1 only development, which constitutes office (other than that classified in A2);<br>2. provide a comprehensive housing scheme on the land to level of development identified in the Borough Council's Strategic Housing Land Availability Assessment<br><br>The Borough Council will prepare a Supplementary |

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| | | | | Planning Document to guide the development of this site." |
| Policy BE. 6 | 021/081 | Generally accords WMRSS policy PA 15. | Noted. | No change to policy. |
| Policy ES.1 | 021/083 | In line with emerging WMRSS Policy PA6A and Table 4. In application of part iv, part B should recognise that waste treatment facilities may be appropriately located on employment sites. | Officers do not consider it appropriate to single out a specific end use in the Core Strategy, particularly where the focus of the strategy is to not be overly prescriptive. However reference to the SA objectives for waste can be referenced in the policy. | Make reference to SA objectives for waste in the Core Strategy. |
| Policy ES.2 | 021/084 | Generally in line with emerging WMRSS Policy PA13A, but the amount of floorspace should be expressed as 'at least', because the RSS specifies a specific requirement. Policy ES.2 should also require that the need for large scale offices outside the town centre needs to be demonstrated. | Officers agree with this representation. However, a local assessment has determined that the 45, 000 sq.m figure proposed in the RSS is unrealistic. A figure of 30, 000 sq.m is proposed, which is also reflected in the revised policy. | Amend policy to reflect representation.<br><br>*Extract from revised Core Strategy policy:* "Based on a local assessment, the Council aims to deliver at least 30, 000 sq.m of office development for the town centre." And "Where large scale (over 5000 sq.m gross and above) office |

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| | | | | development is proposed outside of the town centre, the need for this must be demonstrated in line with RSS policy PA13B." |
| Land to the Rear of Alexandra Hospital | 021/085 | The site is out of centre and therefore if carried forward as B1 use its need must be justified. | Officers agree with this representation and previous Officer responses have outlined the need to review this policy. | Officers to revise Land to the Rear of Alexandra Hospital policy, taking account of this representation and Office Needs Assessment. *Extract from revised Core Strategy policy:* "1. encompass a minimum of 5000 sq.m of high quality B1 only development, which constitutes office (other than that classified in A2)". |
| Policies ES.3 and ES.4 | 021/086 | In line with emerging WMRSS Policies PA6 and PA6B respectively. | Noted. | No change to policy. |
| Policy SP.8 | 088/540 | There is a presence of a lowland meadow, a UK BAP priority habitat, and a hedgerow classed as 'important' under the Hedgerow | Officers are aware that there are constraints on the site and its immediate locale, and the Employment Land Review emphasises the need for | No change to policy. |

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| | | Regulations 1997 on the site. The site is also in close proximity to Rough Hill and Wirehill Woods SSSI. Due to these factors it is questionable why the site is deemed suitable for development.<br><br>The area should be promoted as a green infrastructure network, linking it with the SSSIs, this should occur regardless of the development. | further site investigation. However, based on the research undertaken to date, the constraints are not considered sufficient to warrant the site being removed. It is anticipated that where there are constraints, any development will have to take account of this as part of any potential scheme and incorporate necessary mitigation measures.<br><br>Officers agree that this could be considered as part of any potential development on site. | Issue to be taken forward as part of the further investigation into the development of site. |
| Policy BE.6 | 088/547 | Policy should include requirements to protect and enhance biodiversity and for conversions to be in keeping with the landscape. | Officers agree that biodiversity and landscape are key issues for this site and should be considered as part of any application for development. However Officers do not | No change to policy |

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| | | | consider it to be appropriate to repeat other policies and consider that this is dealt with in sufficient detail in the Natural Environment section. | |
| Policy ES.1 | 088/548 | Recommend the promotion of sustainable access links between residential and employment areas over use of the private car. | Officers agree that this is important and is considered to be a key requirement of good planning. Indeed the policy makes reference to sustainable modes of transport. This is also a key theme of the Core Strategy. | No change to policy. |
| Policy ES.2 | 088/549 | Appropriate policy. | Noted. | No change to policy. |
| Policy ES.3 | 088/550 | Developments which would substantially increase traffic along the A448 to join the A38 would increase carbon emissions. | The purpose of this policy is to create an opportunity for high technology development, but does not identify any particular sites for development. Officers also recognise the need to be careful in allocating sites to ensure there is limited impact on neighbouring districts. | No change to policy. |
| Policy ES.4 | 088/551 | No comment. | Noted. | No change to policy. |
| Land to the | 093/493 | Any consideration of | The Employment Land Review | No change to policy. |

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| Rear of Alexandra Hospital | | development on this site should take account of all of the site and its immediate locale. | sets out the need for further site investigation; this will encompass all of the site and its immediate surroundings. | |
| Location of new employment development | 093/499 | Reference to the draft proposals map.<br><br>The Environment Agency seeks to protect groundwater based upon groundwater sensitivity models, it is noted that some employment sites may overlie superficial watercourses, which are classed as minor aquifers and have water resource potential. | The proposals map is draft until adopted.<br><br>All of the sites proposed to be taken forward for employment development were assessed against the Strategic Flood Risk Assessment, and where there were issues it was considered that mitigation measures could be implemented. However as part of any potential employment development the Environment Agency will be consulted. | No change to policy.<br><br>No change to policy. |
| Office floorspace requirements | 151/263 | Retail needs have shrunk considerably in the past year therefore the present provision negates the planned increase. | Noted. The number of houses, amount of employment land, retail and offices required to be accommodated in Redditch is allocated by the West Midlands Regional Spatial Strategy. The | A revised Office figure of 30,000 sq.m is proposed. |

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| | | | draft Office Needs Assessment identifies a revised office figure of 30, 000 sq.m which is less than the 45, 000 sq.m identified by the WMRSS. | |
| Location of jobs | 153/515 | Targeting jobs along public transport routes would be appropriate as dispersed developments are more difficult to serve via public transport. Development should be focused in places that are well served. | The Core Strategy does not allocate sites to the extent where every future employment site is set out. However the Core Strategy does make reference to the Employment Land Review which contains the potential site allocations. When identifying the potential employment sites to meet future needs, each of the sites were subjected to a series of tests which sought to assess their suitability. The location and accessibility to sites constituted part of this test. However due to the limited amount of land available, there are some sites which are | No change to policy. |

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| | | | further away from public transport routes, although in the view of Officers these are still accessible. It should also be noted that the nature of Redditch being relatively small means that within the urban area, most locations are accessible by public transport. | |
| Policy BE.6 | 263/441 | Relevant to criterion (ii): Worcestershire County Council is in the process of completing a historic farmsteads survey. This information will add to the detail produced by English Heritage, and will assist in guiding sustainable use of historic farms. | Officers agree that this information will be of use in the development of Policy BE.6. | Officers to liaise with Worcestershire County Council regarding this subject area. |
| Policy ES.4 | 264/450 | Policy ES.4 makes reference to the draft proposals map, however the draft proposals map is not available as part of this consultation. Therefore reference to it should be removed from the policy. | Noted. Officers would like to refer to the proposals map in the final Core Strategy, however Officers point out that the Council is not obliged to produce a proposals map as part of this consultation. | No change to policy. |

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| | | The Policy states that applications in existing employment areas will not be permitted unless the criteria set out are met. It is suggested that an additional criterion be added, which should read, "it is no longer viable as an employment area either following a period of unsuccessful marketing or undertaking a viability assessment". | Officers agree that this is a suitable criterion to consider applications for non-employment uses in employment areas, based on emerging national and regional policy. However it is not suitable to repeat regional or national policy. Based on this information the policy does need reviewing, to ensure any applicants are aware of the criteria that would be considered as part of a policy i.e. directing them to national policy. | Amend policy as follows *Extract from revised Core Strategy policy:* "When considering applications for non employment uses consideration should be given to national Planning Policy, particularly Planning Policy Statement 4, and the RSS, particularly Policy PA6B." |
| Employment Land Review | 264/457 | Stage 1 of the Employment Land Review: Brockhill and Land to the Rear of Alexandra Hospital (allocated employment sites in Local Plan No.3) should be made attractive so that employment development is achieved. Lower quality | Promotion of Employment sites falls under the remit of Economic Development. | Officers to pass comments onto Economic Development for their consideration. No change to policy. |

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| | | employment sites, could be offered up for alternative employment uses. | | |
| | | Stage 1 of the Employment Land Review: Based on evidence contained in the Employment Land Review it would be appropriate to target supply of employment land to meet the demand (smaller enterprises). Smaller units should be offered, and larger employment sites could be released for alternative uses. | Officers agree that evidence does indicate that smaller units are more favourable to the Borough. However there is a need to have a balanced portfolio of employment land, and it is not considered appropriate to focus all allocations on smaller sites to deliver smaller units. Larger employment sites contribute towards Redditch Borough being able to achieve this balanced portfolio. | No change to policy. |
| | | Stage 2 of the Employment Land Review: The Council should consider the likely demand for manufacturing and distribution in accordance with the anticipated decline. Those less attractive manufacturing | The Employment Land Review sought to achieve a balanced portfolio of employment land. In terms of manufacturing sites, the current protocol is to follow through paragraph 2.10 of the Supplementary Planning | No change to policy. |

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| | | sites could be reassessed with the potential for them to be offered up for more appropriate uses. This would assist with bringing forward IN67.<br><br>Stage 3 of the Employment Land Review: Site RB32 fronts Windsor Road and due to the age of the existing premises, existing built layout and potential consolidation in the aviation industry, the site could become available for redevelopment in the medium term, particularly if a more modern facility were to be made available in the Redditch area. | Guidance on Employment Land Monitoring.<br><br>Noted. Given the fact that at this stage reference to the site states that it "could become available" it would not presently be appropriate to start planning the re-use of the site. However, Officers would like to point out that if the site were to become available at any time, planning policy would encourage that the site is either re-occupied or redeveloped for employment purposes, to ensure limited losses to stock. In addition, the process of bringing forward a redundant employment site would have to follow the guidance contained in the SPG on Employment Land Monitoring. | No change to policy. |

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| | | The configuration of site RB32 means it is inadequate for its existing occupiers, Mettis. Consequently there is a need for redevelopment if it were to remain in employment use. On-site constraints are significant, and addressing these would compromise the viability of delivering an employment use, particularly now with the falling value of land. These constraints could be addressed and mitigated against through the provision of a non-employment related high value end use, whilst ensuring the re-use of a brownfield site. | The above comments apply to this response. | No change to policy. |
| | | The size of the site conflicts with the demands set out in the Employment Land Review i.e. smaller enterprises. Traditionally the site would have been taken up by large | If a site is functioning, as is RB32, it is not considered suitable to be identifying the site for an alternative use. Officers accept that if the site becomes vacant it is likely that | No change to policy. |

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| | | scale manufacturing; the Employment Land Review has identified that this type of use is in decline. | work will need to be completed in order to make it viable. However at this stage the site is not vacant and therefore not open to consideration. | |
| | | Site RB32 is a suitable site to be considered for an alternative use to employment. | The above comments apply to this response. | No change to policy. |
| | | The Mettis site was deemed suitable for retention for employment use and was therefore not fully assessed in the Employment Land Review. The site should be re-assessed on the basis of its suitability for retention as an employment use. The on-site constraints should be taken into consideration when assessing the suitability of the site to be retained in employment and the financial viability of any redevelopment of the site. | If this site is lost from employment to any other non-employment use, it would be classed as a loss to stock with no guarantee that this loss would be made up elsewhere. Consequently Officers aim to ensure that the site is taken forward for employment purposes if it were to become available again. | No change to policy. |

## *Historic Environment*

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| CS. 1 | 021/ 079 | Policy CS.1 generally accords with the relevant parts of emerging WMRSS policies SR1, SR2 and SR3. | Comment noted. | None. |
| CS. 1 | 028/ 105 | Support approach of Policy. | Support noted. | None. |
| CS. 1 | 029/ 706 | Support Policy. | Support noted. | None. |
| CS. 1 | 042/ 469 | Clause (i)<br>Do not consider it is the role of policies in the Core Strategy to enforce the application of the Building for Life Standards since it is not mandatory for developers to obtain a Building for Life Award. These standards cannot be enforced, particularly where they have not been the subject of rigorous testing through the RSS procedure and other development plan consultation as to their applicability. | It is considered that new buildings and developments in Redditch should aim to be a sustainable and as well designed as possible. The Building for Life Standards cover a range of sustainability issues and is therefore considered important. Officers within Redditch Borough Council are trained to assess new developments against this standard and therefore can apply it to new developments. | None. |

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| | | | The West Midlands Regional Spatial Strategy Phase II Revision Preferred Option contains Policy SR3 'Sustainable Design and Construction' which states that all new housing developments must meet CABE Building for Life 'silver' standard and that all medium and large scale developments (greater than 10 residential units) meet the 'very gold' standard. | None. |
| CS. 1 | 091/ 135 | Disappointing that the policy does not go any further than the provisions of the existing Supplementary Planning Document 'Designing for Community Safety' (Dec 2006). | The requirement for medium and large developments to meet Building for Life 'gold' standards is a new concept. However there is no justification for any addition standards to be achieved, so they cannot reasonably be expected. | None. |
| | | The provisions of Policy CS. 1 | Noted. | Noted. |

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| | | essentially ensure that a development scheme incorporates 'Secured by Design' principles. However, whilst the inclusion of design measures to reduce the opportunities for crime will assist in delivering sustainable communities, they will not remove all crime and disorder activity. There will remain a key role for the West Mercia Constabulary (WMC). | | |
| | 091/ 137 and 137b | New commercial development and developments such as bars and clubs should incorporate 'Secured By Design'. | Achieving the 'Secured by Design' Principles is referenced in the High Quality and Safe Design Policy and is therefore encouraged as part of new development. | None. |
| Policy CS.1 | 262/ 410 | Support for Policy. | Support noted. | None. |
| Policy CS.1 | 085/ 524 | Support for Policy. | Support noted. | None. |
| Policy CS.1 | 088/ 541 | The need for open space to be and feel safe is recognised within the justification, but not within the policy itself. It is | Noted. It is considered that it is appropriate to consider the design and integration of open space | |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | recommended that the policy includes a requirement for proposals to consider the design and integration of open space. | | |
| Policy CS.1 | 263/ 437 | Welcome this policy, particularly criterion (iii). | Support noted. | None. |
| | 103/164(f) | An attractive feature of the town is the architectural details on the fronts of many of the Victorian houses, using sculptured brickwork. There should be a policy preserving this feature along with houses of architectural interest. | This kind of requirement would be more appropriate within a Development Control and Policies DPD, it would not be appropriate for the Core Strategy. | None. |

## *Infrastructure*

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | 021/099 | SC7 deals with developer contributions and lists key | Noted | None |

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| | | infrastructure requirements to deliver the objectives of the core strategy. The emerging WMRSS has no policy on developers contributions | | |
| | 027/479 | Highways Agency support the inclusion of Policy SC7 as the policy will help to ensure that new development is supported by necessary infrastructure. The evidence base should contain the necessary information to demonstrate that this infrastructure is deliverable. | The Core Strategy will include a delivery strategy and an Infrastructure Delivery Plan within the evidence demonstrating whether sites are deliverable or not. | Continue with Infrastructure Delivery Plan |
| | 049/762 | Infrastructure Providers (including the county) should be involved in continued dialogue with the council. Criterion i is unreasonable as it is inevitable that some pressure will be placed on infrastructure, criterion ii and iii are more appropriate. Would like to see habitat creation include the management of existing habitats, particularly existing semi natural habitats. Question | Contact will be made with the County Council with regards to infrastructure requirements; this information will be included within the Infrastructure Delivery Plan which will inform the Delivery Strategy. | |

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| | | why ‘waste disposal’ has been removed when it was included at the issues and options stage. | | |
| | 088/559 | Welcomes Policy SC7 and the inclusion of Green Infrastructure, Open Space and Recreation, landscape character and biodiversity, including habitat creation and local environmental improvements. | Noted | None |
| | 091/130 | WMC consider that the most sustainable sites are those where there is sufficient funding to deliver the required infrastructure to support the sites. If there is not then contributions from development are justified as per the tests of the Circular 05/05.<br>WMC suggest that the following extra paragraph be added to Policy SP2 as follows;<br>‘In all cases, the suitability of sites to be brought forward for development will be tested against the provisions of Policy SC7 – Infrastructure to ensure | The Infrastructure Delivery Plan will demonstrate costs needed to deliver the infrastructure required for the sites. This information will feed into a future CIL document. | Add the following paragraph to Policy SP2;<br>‘***In all cases, the suitability of sites to be brought forward for development will be tested against the provisions of Policy SC7 – Infrastructure to ensure compliance with the objectives of the core strategy’***. |

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| | | compliance with the objectives of the core strategy'. | | |
| | 091/131 | 2 omissions to Policy SP3 in that there is no reference to providing the general infrastructure required to support a development and there is no reference to the Sustainable Communities strategy theme of 'Safer Communities'. Supporting paragraph to Policy SC7 states that without policies covering infrastructure none of the SA objectives would be achieved and that there could be a potential negative effect on achieving the objectives. Therefore why the omission in Policy SP3? | Making reference to providing infrastructure for general development within each policy is not needed as an individual infrastructure Policy is provided.<br><br>Reference is not needed | |
| | 091/134a | Policies SP6, SP7 and SP8. WMC feel that proposals for these sites must involve Section 106/CIL contributions towards new policing infrastructure. WMC request that RBC and eventual developers of these sites engage with WMC as early as | Contact will be made with the Police with regards to infrastructure requirements; this information will be included within the Infrastructure Delivery Plan which will inform the Delivery Strategy. | Inform Development Control regarding early engagement with the police at pre-app stage.<br><br>Include Emergency Services within the list in Policy SC.7. |

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| | | possible during pre-app stage. | | |
| | 091/134b | Policy BE7 – WMC feel that proposals for these sites must involve Section 106/CIL contributions towards new policing infrastructure. WMC request that RBC and eventual developers of these sites engage with WMC as early as possible during pre-app stage. | See response 091/134a | |
| | 091/134c | WMC welcomes Policy ES6 where RBC will seek to maintain and enhance the vitality and viability of Redditch Town Centre through promoting a vibrant and safe evening economy. WMC is of the view that new developments, such as bars and clubs should provide contributions towards new policing infrastructure. | See response 091/134a | |
| | 091/134d | Policies H1, H3, SC1, and SC4. WMC request that they are invited to be involved as early as possible in any proposals to advise on the design of developments and to determine if new policing | The methodology will be looked into when identifying infrastructure costs.<br><br>(See response 091/134a) | Inform Development Control regarding early engagement with the police at pre-app stage.<br><br>Include Emergency Services within the list in Policy SC.7. |

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| | | infrastructure should be provided. It may not be clear to RBC what the actual policing costs would be directly attributable to a given development and therefore not suitable for contributions however the methodology set out in appendix b of the reps identifies the costs. | | |
| | 091/136 | WMC request the following be added to Policy CS1 'provide obligations to be used to fund/provide policing infrastructure necessary to make development acceptable in planning terms'. | The respondents comments have been noted however it is not appropriate to add the text to policy CS1 as not all development would be subject to planning obligations as set out in Circular 05/05 | None |
| | 091/138 | Provisions of Policy SC7 are supported by WMC however surprise that the emergency services have been omitted from the current list of recipients. Although the policy contains the provision that the list is not limited to the infrastructure types listed WMC believe that it will be treated as a definitive list by developers and others. Issues and Options | Noted | Include Emergency Services within the list in Policy SC.7. |

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| | | identified policing as an essential infrastructure. It is also supported by a number of other documents (listed in rep). | | |
| | 093/503 | Reference should be made within Policy SC7 for the phasing of sites in accordance with appropriate infrastructure as there could be timing and cost implications. Clarify difference between 'green infrastructure' and biodiversity including habitat creation and local environment improvements'.<br><br>Further consideration given to 'Environmental Infrastructure' within policy. Suggested the following types of infrastructure be included in the key infrastructure requirements;<br>Foul Sewage<br>Water Supply<br>Surface water drainage<br>Flood Management Works (Defences)<br>Waste<br><br>Reference is made to the use | Biodiversity, including habitat creation and local environmental improvements is covered within 'Green Infrastructure' therefore agree with the rep that this is somewhat confusing.<br><br>With regards to the issue of phasing this may or may not be appropriate and will have to be investigated further, with advice from a regional level. | Amend list in SC7 to read;<br>***Green Infrastructure (including biodiversity, habitat creation and local environmental improvements).***<br><br>Investigate issue of phasing.<br><br>Include the following under the remit of 'Environmental Infrastructure' in the list in Policy SC.7;<br><br>Foul Sewage<br>Water Supply<br>Surface water drainage<br>Flood Management Works (Defences)<br>Waste<br><br>The CIL would cover the whole sewerage network affected by the capacity. |

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| | | of a CIL, would this just cover the area of development or the whole sewerage network affected by the increase in capacity? | | |
| | 104/066 | Core Strategies are required by PPS12 to include an Infrastructure Plan. Policy SC7 does not meet this requirement. It does not represent a spatial strategy for infrastructure planning; it is a development control based responsive policy that is not founded upon any evidence.<br><br>The Council should develop an Infrastructure Strategy that supports the Core Strategy that includes working with Bromsgrove Council in order to deliver cross boundary growth. | The Core Strategy was only draft and this was not a requirement at this stage. An Infrastructure Delivery Plan is currency being worked on and will inform both the delivery strategy and Policy SC.7. This will address the issue of cross boundary growth and working with Bromsgrove District Council. | To be completed for submission. |
| | 108/171 | Asking what consideration is given to local residents in terms of schooling, policing, fire and medical service etc when new builds are proposed. Roads will be congested with | Noted. Opportunities are given to residents at a number of stages through the core strategy process to comment on such issues. The Borough Council is currently working | Continue with Infrastructure Delivery Plan |

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| | | lorries carrying building materials | with Infrastructure providers to assess additional demand on services as a result of future development. This information will be fed into an Infrastructure Delivery Plan and further feed into any future CIL document and Section 106 Obligations to receive monies/additional works to mitigate impacts on exciting infrastructure. | |
| | 109/173 | Need infrastructure for the Studley By-pass, Bordesley By-pass and school sites on the outskirts of town. | Noted. All necessary infrastructures will be investigated and detailed in an Infrastructure Delivery Plan to inform the Delivery Strategy. | Continue with Infrastructure Delivery Plan |
| | 263/442 | Policy SC7 makes no reference to the heritage resources of the Borough – whether individual sites or the wider character of important areas such as the boroughs designated Conservation Areas. We recommend a specific reference should be made to Historic Environment assets. | To be investigated – more information required from English Heritage | Email English Heritage. |
| | 264/456 | Support Policy SC7 and criterion i. The wording of | Noted. The ‘and’ after criterion ii should remain as all 3 | Amend the wording of criterion ii to read |

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| | | criterion ii is somewhat confusing and could be amended to read “its impacts on the existing infrastructure required to support it are minimised”. Alternatively criterion ii could be deleted as its covered by criterion i. and iii.<br><br>The ‘and’ after criterion ii implies that all three criterions must be met in order for proposals to be permitted. We suggest amending this to ‘or’ which would ensure that only the relevant criterion applies.<br><br>The wording of criterion iii should be amended as follows: “appropriate investment is secured in either in the form of works or financial contributions to mitigate the cumulative impact of the proposed development on local infrastructure”. | criterions must be met in order for proposals to be permitted.<br><br>Criterion iii will be amended however the term ‘local infrastructure’ will be replaced by just ‘infrastructure’. | ***‘its impacts on the existing infrastructure required to support it are minimised’.***<br><br>Amend the wording of criterion iii to read ***‘appropriate investment is secured in either in the form of works or financial contributions to mitigate the cumulative impact of the proposed development on local infrastructure.*** |

***Landscape, open space, nature, pollution, Green Belt***

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| Policy BE.3 | 021/ 080 | Policy BE.3 generally accords with published West Midlands Regional Spatial Strategy (WMRSS) Policy QE. 6. | Noted. | None. |
| Policy BE.5 | 021/ 081 | Policy BE.5 generally accords with published WMRSS Policy QE8B and emerging WMRSS Policy PA15. | Noted. | None. |
| Policy H.2 | 021/ 091 | Policy H.2 accords with published WMRSS Policies QE. 4, QE. 7 and QE. 8. | Noted. | None. |
| Policy BE.5 | 024/ 110 | Support for Policy BE.5. | Support noted. | None |
| Policy BE.5 | 049/742 | Consideration should be given to new tree planting in regard to existing habitats e.g. grassland.<br><br>Item (iv) of Policy should be | The intention of this policy is to ensure that where new development is to occur, the proposal is sympathetic to the features of the Borough i.e. the abundance of trees. This policy now forms part of the Natural Environment Policy within the Core Strategy.<br><br>The key principle of this policy | None<br><br>None. |

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| | | made clearer as it currently reads all proposals will be expected to involve tree planting for timber production; perhaps change wording to states 'for example' after the word 'planting'. | is that trees, woodlands and hedgerows in Redditch are retained and their appropriate management encouraged, this key point has been transferred to a new Natural Environment Policy within the Core Strategy. The remaining points of this policy have been removed as it is considered they are more suitable for a Site Allocations and Policies DPD. | |
| | | Under point (vi) please refer to the Forestry Woodlands Mapping Strategy and the Historic Landscape Characterisation when completed. | Please see above with regard to point (vi) of this Policy. With regard to using the Forestry Woodlands Mapping Strategy and the Historic Landscape Characterisation, it is understood that these studies will not be complete until Spring 2011 and therefore too late to feed into the Core Strategy process. | None. |
| | | Proposals for planting should | A sentence will be included | A sentence will be included |

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| | | not cause damage to known or suspected features of archaeological importance. | within the aspect of the policy trees sits within which refers to the need for planting to ensure that damage is not caused to areas of known or suspected archaeological importance. | within the paragraph of the Natural Environment Policy which states "*Proposals for planting should not cause damage to known or suspected features of archaeological importance".* |
| Open Space | 049/ 747 | A number of open spaces have specific historic interest. This should be used to enhance their character and engender local pride. Further open spaces may also be designated for principally historic interest and then developed for their amenity value. | The importance or some of the open space areas within the Borough for historic interest will be investigated further through the production of the Green Infrastructure Strategy. If it is considered that some of these areas are important for historical purposes and open space purposes this will be taken on board when the Open Space Needs Assessment is revised, and the open space designated accordingly. | None. |
| | 082/ 764 | Cannot support Strategy as a Playing Pitch Strategy has not been carried out. | Playing Pitch Strategy will form part of the evidence base to the Core Strategy. | None. |

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| | | Evidence for the indoor facilities is highly suspect on pools and halls. Need to run a facilities planning model. Cannot use the Sports Facility Calculator for predicting demand on its own. Some of the policies in the Preferred Draft Core Strategy are at risk if the above issues are not addressed mainly SP.6 and SP.7. There may also be possible implications for the Green Belt and Employment Land Allocations. These studies are also important for the BSF Programme and other developments affecting schools. It could/ will prejudice S77s if there is not a robust Playing Field Strategy in place. | Facilities Planning Model will be included as part of the evidence base to the Core Strategy. | None. |
| Trees | 085/ 525 | The Core Strategy should encourage the responsible management of existing trees, woodlands and hedgerows. | The intention of Policy BE.5 within the Core Strategy is to ensure that where new development is to occur; the | None. |

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| | | Exception should be made for the removal of existing trees, woodlands and hedgerows that are not healthy or of any particular merit in terms of their quality, particularly where appropriate mitigation or replacement planting is proposed. | proposal is sympathetic to the features of the Borough i.e. the abundance of trees and to ensure this is incorporated into the development proposal.<br><br>With regard to existing trees including management, this will be included as a principle within the new Natural Environment Policy within the Core Strategy. In terms of the removal of trees due to quality, those trees with Tree Preservation Orders would be inspected by the Landscape Officers within the Council and judged on an individual basis. Where removal does occur it is anticipated that the tree would be replaced, however this cannot be enforced. | |
| Policy BE. 3 | 088/ 544 | Support the inclusion of this Policy and the use of the Landscape Character | Support noted. | None. |

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| | | Assessment for Worcestershire. | | |
| Policy BE. 5 | 088/ 546 | Welcome the Policy. The requirement to expand and link ancient semi-natural woodlands is particularly positive; this principle should be applied to all semi-natural and natural habitats, particularly those which are BAP priorities.<br><br>Recommend that the expansion and linking of habitats be considered within the context of green infrastructure in order to secure the delivery of multifunctional benefits.<br><br>Consideration should be given to the role of woodlands in a warming climate, for example, the suitability of a species to warmer and dryer climate | Agreed. This aspect of the policy is now contained within the new Natural Environment Policy within the Core Strategy. The text will be amended to ensure the requirement is detailed that ancient semi-natural woodland is expanded and linked.<br><br>See response to 049/ 722.<br><br>There are many benefits to the role of woodlands. However it is not considered appropriate that all of these benefits are listed in the policy. Rather the | Text to be amended to read *"Particular emphasis should be placed on expanding and linking ancient semi-natural woodlands."*<br><br>See action to 049/ 722.<br><br>None. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | should be considered when creating new woodlands. Resistance to recreational pressures may also become a consideration, as the shade woodlands provide may increase their popularity for recreation. | generic principle of extending and linking woodlands is promoted. | |
| Policy H. 2 | 088/ 555 | Underlying confusion in policy between green infrastructure and its relationship with open space. Policy is labelled 'open space' but incorporates biodiversity and concludes that consideration of the two together equates to green infrastructure. The Core Strategy should present green infrastructure as an overarching framework within which open space and biodiversity sit. Policies on landscape, climate change, flood risk, pollution, trees and sustainable transport should be | The Core Strategy will be restructured and the included polices will be refocused to ensure better clarification between open space and biodiversity. This will be refocused with a clear emphasis on the role of Green Infrastructure. A Green Infrastructure Strategy is currently being prepared which will inform the content of the Core Strategy. These elements sit within the 'Green Strategy' of the Core Strategy. | None. |

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| | | clearly cross- referenced.<br><br>A green infrastructure strategy should be undertaken, forming part of the evidence base and informing policy direction.<br><br>The policy on open space should include a presumption against the development of open space, and that where open space will be lost the substantial enhancement of remaining and/ or nearby open space should be required.<br><br>Would welcome the setting of an open space provision | See response to 049/ 722.<br><br>Agreed. The policy directs for a presumption against the development of open space by stating that *'Primary Open Space will therefore be protected…'* and *'proposals involving a loss or partial loss of open space will be assessed again the following criteria'.* However an additional sentence will be included which states that where open space will be lost the substantial enhancement of remaining and / or nearby open space should be required.<br><br>The open space provision standard is a result of the open | See action to 049/ 722.<br><br>Include sentence in policy to read *"where open space will be lost the substantial enhancement of remaining and/or nearby open space will be required."*<br><br>None. |

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| | | standard which is comparable to the rest of Redditch within all new developments and includes reference to Natural England's Accessible Natural Greenspace Standards (supplied), which should be strategically delivered within the context of green infrastructure. | space needs assessment (March 2009) completed for Redditch Borough Council. Natural England's Accessible Natural Greenspace Standards have been considered as part of the preparation of the open space needs assessment. With regard to Natural England's standards the document concludes that, *"on the whole, Redditch Borough performs well for accessing semi-natural open spaces, and also for proximity to green spaces that can be accessed outside the Borough, such as the Lickey Hills and Malvern."* (From the Open Space Needs Assessment, March 2009). | |
| Policy BE. 4 | 088/ 545 | Clarification is needed to ensure the policy achieves its purpose. It is not clear how the 'acceptability' of an application in terms of its resulting | Officers consider that the control of pollution is adequately covered by Planning Policy Statement 23 'Planning and Pollution | Delete policy. |

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| | | pollution will be judged, especially considering cumulative impacts. Consideration should be given to the type of information which may be needed to make informed judgements on applications, and whether the Sustainability Statement currently required under Policy BE.1 could be tailored to meet this requirement.<br><br>It is not clear what receptor the policy applies to. The policies position in the 'Better Environment' section and its pre-amble indicate that the natural environment is the receptor, but the symbols used to indicate the Sustainability Objectives show that the policy will help to improve health and well-being. | Control'. Therefore this policy is likely to be removed from the Submission Core Strategy.<br><br>The pollution policy seeks to work toward achieving a number of objectives both environmental and health related. The policy is suited to the Better Environment section, however by implication the policy does seek to reduce the impact of new development on health. There are a number of similar instances in the Preferred Draft Core Strategy. | Delete Policy |

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| | 212/ 348 | There is no reference to Planning Policy Statement 9 – Biodiversity and Geological Conservation.<br><br>The Worcestershire Geodiversity Action Plan has just been launched and this should be referred to in the strategy, alongside the Worcestershire Biodiversity Action Plan. | The following documents have been considered when preparing the Core Strategy and will be reference in the 'Green Strategy' Technical Paper. It is not always necessary to reference County, Regional and National Planning Policy in the Core Strategy. It is considered that the Geodiversity Action Plan and the Biodiversity Action Plan do not have any significant implications for the Core Strategy and the main principles of the Actions Plans will be achieved through the Natural Environment Policy. | Ensure that Planning Policy Statement 9 'Biodiversity and Geological Conservation', the Worcestershire Geodiversity Action Plan and the Worcestershire Biodiversity Action Plan are referred to in the 'Green Strategy' Technical Paper where necessary. |
| A Better Environment for Today and Tomorrow | 212/ 352 | Paragraph 1 – object to the definition of the natural environment. The natural environment includes all aspects of living and non-living nature, including soils, natural processes and geology. | A definition of the Natural Environment the Glossary of the Submission Core Strategy will be expanded. | Definition of Natural Environment in Glossary to read, *"Trees, wildlife corridors, rivers, sites of national, regional or local importance and other sites of biodiversity importance including aspects* |

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| | | | | *of the environment that are living and non-living such as soils, geology and natural processes."* |
| | | Paragraph 2 – the sentence beginning "SSSIs are Sites of National Wildlife importance…" does not make sense. This should be removed, as it is repetition (and inaccurate repetition) of the definition later on in the sentence. | This section of the introduction will be removed from the Submission Core Strategy. | Remove second paragraph of the Introduction to the 'Better Environment for Today and Tomorrow' section. |
| | | There is no policy with respect to biological or geological conservation within the Borough. Other Core Strategies within Worcestershire appear to cater for this. A policy would be welcomed that stated the role of development proposals in safeguarding and enhancing biodiversity and geodiversity and the suite of designated sites that they contain. | Please see response to 212/351. | Please see action to 212/351. |

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| Policy BE.3 | 017/ 243 | Support for the Reasoned Justification for the Policy. | Support noted. The principles of this Policy can be contained within a broader Natural Environment Policy within the Submission Core Strategy. | None. |
| Policy BE.5 | 017/ 244 | The introduction to the Policy uses the word 'should' three times, these should be replaced with 'will', 'to' and 'are to' respectively. The word 'must' should be used at the beginning of the last paragraph of the policy. In the Reasoned Justification, the first 'should' should be changed to 'will' and the last 'should' be changed to 'needs to'.<br><br>The term veteran should be replaced with the term ancient. | The principles of this policy have been retained and can be merged with the Natural Environment policy for the Submission Core Strategy. The suggested term changes will be reflected where appropriate.<br><br>The term veteran will be replaced with the term ancient where appropriate. | Amend term changes to those recommended, where appropriate.<br><br>Replace veteran with the term ancient where appropriate. |
| Policy H.2 | 017/ 247 | Support for this Policy. | Support noted. | None. |
| Policy BE.4 | 093/ 497 | This policy focuses solely on | This policy is recommended to | None. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | Air Quality; if this is the intention of the Policy it should be re-titled 'Air Quality'. Water quality issues (pollution) could be picked up in the water management or climate change policy as suggested above and it is noted that soils (contaminated land) has been picked up within Policy SP. 3 on Sustainability Principles. | be removed from the Submission Core Strategy as Officers consider that this is adequately covered by national planning policy. | |
| Policy BE. 5 | 093/ 498 | Wish to see biodiversity included within a policy in the document, it is noted that it has been picked up in the final paragraph of this policy, and would suggest that proposals should also be looking to enhance biodiversity in the area through the proposed development and potential developer contributions. It is acknowledged that biodiversity has also been picked up in the | Biodiversity forms part of the 'Green Strategy' within the Core Strategy and therefore is referred to throughout the document. It is considered that nothing additional could be achieved through having a biodiversity policy that is not achieved already. | None. |

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| | | open space policy (H.2). | | |
| Policy H.2 | 093/ 500 | Recommend that Policy H.2 is changed to sound more positive by removing *'Proposals involving a loss or partial loss of…'* so that the policy reads – '*The provision of Open Space will be assessed against the following criteria as applicable…*'<br><br>An additional point could be added to this policy to consider its multi-functional use. For example open space can be utilised within a development site to control surface water runoff through the provision of SuDS (i.e. ponds, wetland habitat, swales etc), provide flood storage areas etc. | The wording that is recommended does achieve the necessary protection against loss of open space where it would be necessary.<br><br>It is considered that there are significant benefits to open space, however listing all of these benefits would make the policy unduly long. These benefits will be fully detailed in the 'Green Strategy' Technical Paper. | None.<br><br>None. |
| Green Infrastructure | 049/ 722 | An additional policy on Biodiversity and Green Infrastructure is recommended as green infrastructure can | Biodiversity and Green Infrastructure will be incorporated as a principle within the Natural Environment | Insert principle in the Natural Environment Policy which states, *"Protect and enhance the quality of natural resources* |

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| | | play a role in reducing flood risk, reducing the 'heat island' effect and providing crucial linkages for habitats. Trees, the historic landscape, open spaces are just some of the attributes that make up green infrastructure and these should be included within a policy on green infrastructure. | Policy. | *and green infrastructure resources in the Borough including water, air, land, habitats and biodiversity."* |
| | | A Green Infrastructure Study and detailed ecological surveys should be undertaken that feed into Site Allocations/ Master Plans/ Development Briefs/ Area Action Plans along with PPS 9 compliant Development Control decisions. | It is considered that this study will be appropriate in advance of the Site Allocations and Policies DPD. | None. |
| | | There is a need for ecological connectivity between sites promoting a functional Green Infrastructure within the built and rural environment. This should be addressed in the | Policy B(NE).1 Overarching Policy on Intent from Local Plan No.3 is saved. This policy states that, *"where possible conserve, enhance and link habitats".* | None. |

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| | | document. | | |
| Policy BE.3 | 049/ 740 | The Policy is welcomed subject to the Central Marches Historic Towns Survey being used as a basis for forward planning. This study requires updating and incorporation into the on-going Historic Landscape Characterisation Project. Other information is available from County Historic Environment Record. | The Central Marches Historic Towns Survey has been used as part of the Core Strategy evidence base. | None. |
| Policy BE.4 | 049/ 741 | Both the natural and historic built environments are susceptible to pollution. It is important to consider soil and water pollution, as well as air, in this context. The policy is lacking in this area. The Draft Hereford & Worcestershire Air Quality Strategy could usefully inform this section of the strategy. | It is considered that pollution is adequately covered by PPS 23 'Planning and Pollution Control'.<br><br>The Hereford & Worcestershire Air Quality Strategy has now been finalised and concludes that there are no areas within Redditch Borough that exceed the air quality objectives.<br><br>Both of these documents have | None.<br><br>None.<br><br>None. |

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| | | Regard should also be had to the Water Framework Directive and River Basin Management Plans.<br><br>The Planning for Soil and Water Technical Research Papers can inform this section when preparing the Core Strategy Submission Document. | been considered in the formulation of the Core Strategy.<br><br>Both of these documents have been considered in the formulation of the Core Strategy. | None. |
| Policy H.2 | 049/ 752 | The introduction to 'Open space' recognises that the 1990 Act provides a definition of open space and there is also reference to PPG 17, however it is important to note that within PPG 17 at Annex; Definitions (1) the definition of open space is widened *(full definition provided)* the Preferred Draft Core Strategy should recognise these wider purposes. | The definition provided will be included within the Glossary to the Core Strategy.<br><br>The criteria are required to | Insert the following definition of open space within the Submission Core Strategy.<br><br>None. |

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| | | The general thrust of H.2 is welcomed but there are concerns over how loosely the criteria are defined for example wording could be *"in exceptional circumstances, proposals resulting in the loss of any part of this primarily open space will only be considered where the developer can satisfactorily ensure …(i) (ii) (iii)"*<br><br>Parts of (i) and (ii) sound very similar and might want to be amended.<br><br>It is recommended that the policy wording under criteria (vi) is reworded as follows: | ensure that any loss of open space is only allowed in certain circumstances and where it can be proven that this is not detrimental.<br><br>Criteria (i) considers the wider environmental and amenity value the site adds to the wider area, whereas criteria (ii) relates to the specific site and how it can be reserved for alternative uses. These criteria are considered to achieve different things and are worth retaining.<br><br>Comment noted. The wording will be amended as suggested. | None.<br><br>Amend wording of criteria (vi) to *"ecological connectivity and features of biological importance, such as hedgerows, watercourses and* |

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| | | *"ecological connectivity and features of biological importance, such as hedgerows, watercourses and other features of biodiversity importance".*<br><br>The policy could mention the benefits of open space as a flood storage area, perhaps as one of the criteria.<br><br>The final paragraph of the Reasoned Justification for Policy H.2 needs to be explained and made clearer. Why does a change in ward boundaries affect open space levels, the policy for which is applied on a Borough-wide basis?<br><br>The following text is included in the Reasoned Justification (page 87), *'The Borough* | It is considered that it may be more appropriate to detail the benefits of open spaces in the introduction to the policy rather than in the policy itself.<br><br>Each ward has a level of open space, as the boundaries have been amended this level will change, as previously open space that was in one ward may now be in another. This paragraph will not feature in the Submission version of the Core Strategy.<br><br>It is considered that it would be appropriate to include this criterion in the policy. | *other features of biodiversity importance".*<br><br>Add wording to the introduction of the open space policy as follows, *"there are a range of benefits of open space including the use as a flood storage area."*<br><br>None.<br><br>Include wording within main body of the Policy, *"The Borough Council will consider applications for ancillary development on Primarily* |

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| | | *Council will consider applications for ancillary development on Primarily Open land that would enhance the existing open space use.'* It is questioned whether this text should be included in the Policy wording of H.2. | | *Open land that would enhance the existing open space use."* |
| Page 60 Policy BE.5 Point (vi) | 102/ 152 | Suggest reference to the Forestry Woodland Mapping Strategy and the Historic Landscape Characterisation when completed. | It is not clear which Forestry Woodland Mapping Strategy the applicant is referring to. The Historic Landscape Characterisation is not yet complete. | None. |
| Page 82 Para 2 | 102/ 153 | A number of existing open spaces have specific historic interest. This should be used to enhance their character and engender local pride. Further open space may also be designated for principally historic interest and then developed for their amenity value. | Please see response to 049/ 747. | Please see proposed action to 049/747. |
| Page 87 | 102/ 154 | Green Infrastructure Strategies | See response to 049/ 722. | See action to 049/ 722. |

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| | | also includes consideration of the historic environment as an integral element of assessment. | | |
| Policy BE.3 | 263/ 439 | The general principle of this policy is welcomed; however, there are concerns over the lack of recognition given to the historic character of the Borough's landscape and the emphasis placed on the County Council's Landscape Character Assessment.<br><br>In assessing the impact of proposals on the character of the landscape, its historic dimension must be taken into account in order to accord with the European Landscape Convention. The County Council are progressing a county wide Historic Landscape Characterisation (HLC). It is recommended that | Agreed. Reference to the historic character if the Borough will be included within the introduction to the Natural Environment Policy.<br><br>The HLC is not anticipated to be completed in time to fully inform the Core Strategy Policy, however the importance of the natural landscape will be incorporated into the Natural Environment Policy. | A reference to the historic character if the Borough will be included within the introduction to the Natural Environment Policy; however this wording has not yet been finalised.<br><br>A reference to the importance of the natural landscape will be incorporated into the Natural Environment Policy, however the exact wording has not yet been finalised. |

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| | | the implementation of this policy includes a reference to the HLC, and that the County Council are contacted regarding the provision of interim information to inform development proposals. | | |
| Policy BE.5 | 263/ 440 | Point (vi) should include a reference to *'other information sources, such as the Historic Environment Record'.* | This point has been removed from this policy. Reference to the Worcestershire Landscape Character Assessment is made within the Natural Environment Policy. With regard to other references that could be incorporated in the Policy, it is considered that only references which fully contribute to directing the actions people could take should be referred to therefore generic references to broad documents such as the Historic Environment Record are avoided. | None. |
| Policy BE.5 | 264/ 449 | It is suggested that the wording of this policy is amended as | It is considered that this additional wording would | None. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | follows *"existing trees, woodlands and hedgerows should be retained where practicable and where the trees are of good quality/ species to warrant retention and their appropriate management encouraged."* | provide an unnecessary amount of detail. The strategic aspirations of the aspect of this point are to retain trees, woodland and hedgerows and ensure appropriate management. Detail on whether this may always be practical and the quality of the trees would be detail that would be considered at the application stage by the Officer dealing with the application. | |
| Policy BE.5 | 103/164(a) | Policy BE.5 (iii) has no public agreement and does not maintain the existing distinctiveness created by the Development Corporation. It is resulting in wholesale destruction of most of the trees planted by the Corporation, including beech, hemlock, spruce etc. Rather than preserving the landscape, this is creating new space that is | Criteria (iii) of Policy BE.5 will not be continued into the Submission version of the Core Strategy, however one of the key features of the Core Strategy is to retain and enhance the trees that are in abundance within the Borough, as this is one of the key features of the Borough that should be retained and enhanced. Therefore the | None. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | neither attractive nor desirable in the public environment. | general principle of this policy will be contained within the Natural Environment Policy. | |
| Green Belt | 103/ 164(a) | Building on Green Belt farmland is the present intention. Fail to see how moving the Green Belt will preserve the openness of this resource, and protect the best agricultural land, or preserve biodiversity interest.<br><br>There should be a strategy for dealing with green waste generated in the timbered parts of the borough. Once killed, this material can either be allowed to rot on or in the ground, or burned to create heat and electricity. | The whole Green Belt surrounding Redditch Borough was considered for development and it was concluded that the preferred and most sustainable location (including preserving the openness of the Green Belt) for development to the North of Redditch Borough.<br><br>Dealing with waste generated from new developments is a consideration for the Core Strategy; however general waste processes are a matter for other Council departments. | None.<br><br>None. |

## *Miscellaneous*

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | 017/237; CPRE | Redditch being designated an SSD. Exactly what is meant or referred to as "significant development". Some indication of what "significant" is essential to provide guidance. | Agree. The designation of Redditch as an SSD was challenged by Redditch Borough Council at the West Midlands Regional Spatial Strategy Phase Two Examination in Public and this designation was duly removed in the RSS Panel Report. | Reflect Redditch's WMRSS designation in the Core Strategy. |
| | 017/239; CPRE | Local Distinctiveness document - not on website. The factual description could be the intro of the final core strategy as it contains history which precedes the descriptive portrait. It mentions the cinema and the Core Strategy doesn't. | The Local Distinctiveness Document will be available in due course as part of the evidence base for the Core Strategy. The Local Distinctiveness Document was fully incorporated when drafting the Spatial Portrait for the Core Strategy and all relevant information was included. | None. |
| | 017/250; CPRE | Page 126 Glossary and Abbreviations. English Nature now known as Natural England | Noted. The Glossary will be amended to ensure that reference is made to Natural | Amend Glossary under definition to Site of Special Scientific Interest to read |

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| | | | England rather than English Nature. | *"Specifically defined areas where protection is afforded to sites of national wildlife or geological interest. Natural England is responsible for identifying and protecting approximately 4,100 SSSIs in England."* |
| | 021/071a WMRA | *RSS Objective (a) to make the MUAs of the West Midlands increasingly attractive places where people want to live, work and invest*<br>Not Applicable to this Core Strategy. | Noted | None |
| | 021/071b WMRA | *RSS Objective (b) to secure the regeneration of the rural areas of the Region*<br>The relevant Key Themes and policies, notably Policy SP2 Development Strategy, and BE6 Rural Economy support this objective. | Noted. | None |
| | 021/071c WMRA | *RSS Objective (c) to create a joined-up multi-centred Regional structure where all areas/centres have distinct roles to play*<br>The Core Strategy Vision, | Noted. The redraft for the vision and objectives will continue to support this RSS Objective. | None |

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| | | relevant Key Themes and spatial policies support this Objective | | |
| | 021/071d WMRA | *RSS Objective (d) to retain the Green Belt, but to allow an adjustment of boundaries where this is necessary to support urban regeneration*<br>Policy SP2 Development Strategy supports this objective and also the objective as amended in the emerging WMRSS revision | Noted. | None |
| | 021/071e | *RSS Objective (e) to support the cities and towns of the Region to meet their local and sub-regional development needs.*<br>Refer to conformity advice on the cross-boundary issues associated with the growth of Redditch. | Noted. See responses to Cross Boundary Issues. | None |
| | 021/071f WMRA | *RSS Objective (f) to support the diversification and modernisation of the Region's economy while ensuring that opportunities for growth are linked to meeting* | Noted. Objective 10 will be retained and continue to support this RSS Objective. | None |

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| | | *needs and reducing social exclusion*<br>Strategic Objective 10 and Policies under the Theme 'Economic Success that is shared by all' support this objective. | | |
| | 021/071g WMRA | *RSS Objective (g) to ensure the quality of the environment is conserved and enhanced across all parts of the Region*<br>Strategic objectives 1, 4 and 11 and relevant policies generally support this Objective. | Noted. Objectives 1, 4 and 11 will be maintained and continue to support this RSS Objective. | None |
| | 021/071h WMRA | *RSS Objective (h) to improve significantly the Region's transport systems*<br>The relevant policies under the theme Stronger Communities generally support this objective | Noted. | None |
| | 021/071i WMRA | *RSS Objective (i) to promote the development of a network of strategic centres across the Region.* The relevant policies in the Core Strategy relating to Redditch town generally support this objective. | Noted. | None |
| | 021/071j WMRA | *RSS Objective (j) to promote Birmingham as a world city* | Noted. | None. |

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| | | Not applicable to this Core Strategy. | | |
| | 029/714; Tetlow King | Glossary and Abbreviations: Welcome reference to Government guidance on affordable housing. A specific reference should be made to PPS3.<br><br>Where other guidance and standards are referred to, specific links should be inserted, indicating where these may be found to ensure ease of reference for all. | Noted. Reference will be made to PPS3 in the glossary entry for Affordable Housing.<br><br>The use of weblinks in the Glossary has been investigated. However, Officers have reservations about this as weblinks can move and become out of date. | Make reference to PPS3 in the glossary entry for Affordable Housing.<br><br>None |
| | 029/716; Tetlow King | Throughout the Core Strategy, reference is made to the emerging draft RSS Phase Two Revision which has not yet been tested at examination. This should be closely monitored as changes may be made which will impact on a number of policies within the Core Strategy. Any changes should be taken into account and amendments made to reflect the RSS. | The submission version of the Core Strategy will be published allowing sufficient time to consider the RSS Panel Report. | Take account of changes to the RSS and reflect these in the submission version of the Core Strategy. |
| | 049/724; | It is not always very clear how | This approach will not be | None. |

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| | Worcs CC | the 'What you told us' and 'What the Sustainability Appraisal suggests' has been taken through in to policy. | carried through to the Final Core Strategy. | |
| | 049/748; Worcs CC | Arrow Valley Country Park should be referred to consistently as such; not Arrow Valley Park or Countryside Park. This is important because Country Parks have a particular status which Redditch Borough Council should commit to maintaining - along with Green Flag. The Green Flag Award Scheme is the national standard for quality parks and green spaces and it should be referred to within the Core Strategy. | Noted. This will be changed for the submission version of the Core Strategy. Reference to the Green Flag status of Arrow Valley Country Park will be made in Spatial Portrait. | Consistently refer to 'Arrow Valley Country Park' as opposed to Arrow Valley Park or Countryside Park. Refer to the Green Flag status of Arrow Valley Country Park within the Spatial Portrait. |
| | 049/754; Worcs CC | Stronger communities section: in the third paragraph of the introduction, page 90, the wording may suggest that roads are the principal use in the hierarchy. Although this issue is clarified in the Transport section, this introduction could be reworded. | It is unlikely that the introduction as it is currently worded will be carried forward to the final Core Strategy. However, relevant reference will be made to make it clear that it does not mean roads are the principal use in the hierarchy. | Ensure that the final Core Strategy does not suggest that the roads are the principal use in the hierarchy. |
| | 049/755; | Why has the safeguarding of | If there is evidence that | None. |

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| | Worcs CC | back gardens not carried through from Issues and Options? No assessment has been undertaken to say that areas don't have special characteristics which would justify the protection of back gardens from development. Couldn't proposals be considered on a case-by-case basis to determine specific impact, with a general policy against back garden development?<br><br>If the only reason for not developing at different density standards (page 92, 2nd paragraph) for each District in Redditch Town is not undertaking an assessment, why isn't the assessment being undertaken? If there are other reasons for not undertaking the assessment, or not developing different density standards they should be made clear. | development on back gardens should be restricted, a policy will be considered but this is now considered more appropriate for a development control style of policy rather than Core Strategy.<br><br>The initial decision not to undertake the assessment was taken following consultation with English Heritage and advice that there are few distinctions between the characters of different Districts in the Borough. The reasoned justification for policy SC2 states that the Borough Council will apply the densities set out in PPS3 as there is no justification for local deviations. In any case this is now considered more appropriate for a development control style | None |

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| | | | of policy rather than Core Strategy. | |
| | 080/121; Bladon | Land between the northern end of Tunnel Drive and the southern entrance to the old railway tunnel should be improved and managed by an organisation like The Woodland Trust or Worcs Conservation Trust and developed into a proper conservation area or park. | Management o sites is not a Core Strategy matter. The designation of this area as a Conservation Area is not applicable in-line with National Guidance in PPS15. | None. |
| | 088/535 Natural England | It is difficult to tell from the Key Diagram where the identified Strategic Sites are. An OS map backdrop or closer scale diagrams indicating locations would be helpful. | As a key diagram is meant to be for indicative purposes only, mapping the precise boundaries of strategic sites on the key diagram is not required. Site boundaries will be identified for the submission version of the Core Strategy in the proposals map DPD. | Identify the boundaries of strategic sites in the submission version of the Core Strategy for inclusion on the Proposals Map DPD. |
| | 091/128; West Mercia Constabulary | Welcome the Objective of reducing crime and anti-social behaviour and the fear of crime being recognised as relevant to three of the key themes. The recognition by the Council that reducing crime and the means to achieve this, is relevant | Noted. | None. |

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| | | across its key spatial priorities reflects the approach advocated by PPS1. | | |
| | 101/143 Bish | Unable to access document on the website. The whole thing should be viewable in one document as anyone giving feedback will want to know all matters being considered and can easily scroll down past anything they don't want to comment on.<br><br>Why is the feedback form in a format that cannot be filled in electronically, in order to save paper? | The Preferred Draft Core Strategy and associate documents were available on the Council's website for the duration of the consultation period 31st October - 8th May.<br><br>An e-mail address was supplied for comments to be submitted electronically. | None.<br><br>None |
| | 110/174 | Disagree with Core Strategy as a whole. Redditch in itself has inadequate facilities to support the local communities now let alone future development. Brockhill still has no district centre, health centre or school. There has been no provision made for the Brockhill area.<br><br>Lack of hospital and leisure facilities. | Infrastructure requirements related to the delivery of the Core Strategy are currently being investigated and will be included in the final version of the Core Strategy and as part of the Evidence Base to support the demonstration that it is deliverable.<br><br>The Core Strategy includes policies that support the | None<br><br>None |

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| | | | provision of new leisure facilities and new or improved health facilities. | |
| | 127/199; Mrs M Shaw | Instead of developing new housing, it would, in the current climate, be more cost effective and resident friendly, to purchase some of the houses that should not have been sold off in the first place. The council could buy the houses of people being evicted because they cannot meet mortgage payments and let them to the existing occupants to allow them to stay in their homes. | This is not a matter for the Core Strategy. | None |
| | 133/208; Ceridwen John | Tall buildings, especially in the Town Centre, should be considered as a good way of achieving our housing targets without using up more greenfield land than necessary. | Based on the views in representations received during the Core Strategy Issues and Options Consultation, it was decided not to develop a local policy on tall buildings but to rely on National Planning Policy, English Heritage and CABE guidance. | None. |
| | 151/261; V Wilcox | The suggested redevelopment and regeneration areas seem reasonable. | Noted. | None. |

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| | 182/303 | The number of houses quoted is excessive for the Redditch/ Bromsgrove areas, which are already built up. Much beautiful countryside has been lost to provide roads and housing estates. Redditch itself was designed to fit into a compact area which it has now filled. Other, disused land must be sought. | The number of houses required to be accommodated in Redditch/ Bromsgrove is allocated by the West Midlands Regional Spatial Strategy. | None |
| | 198/320; Ridgeway | Sorry to see so many buildings going up in Redditch. All our green fields will be taken up with brick buildings. Many properties appear to be empty either for rent or sale. | Noted. The number of houses, amount of employment land, retail and offices required to be accommodated in Redditch is allocated by the West Midlands Regional Spatial Strategy. | None. |
| | 213/353 Earth Heritage Trust | Glossary and abbreviations: An entry defining geodiversity would be welcomed. | Noted. | Include 'geodiversity' in the glossary of the Core Strategy with the meaning: *Contraction of "geological diversity". Geodiversity is the range of rocks, fossils, minerals, soils, landforms and natural processes that make up the Earth's landscape and structure.* |
| | 263/438 English | Better Environment section: the environment also includes the | Noted. The historic environment will be included in | Include historic environment in descriptions of the Borough's |

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| | Heritage | historic environment and this needs to be underlined in the introduction, particularly with regard to the Borough's landscape and rural areas. | descriptions of the Borough's environment. | environment. |
| | 267/577 Barton Wilmore | The DPD makes reference to the Nathaniel Lichfield and Partners Report. Whilst no changes in respect of the numbers to be provided within Redditch were proposed, we highlight that there is no suggestion within the NLP Report that there is insufficient land within Redditch to meet the housing targets as set out in the emerging RSS. Given the extensive consultations with LPAs during the preparation of the report, it is fair to assume that any concerns would have been highlighted to the authors of the report at that stage. | It was not within the remit of the NLP report to consider the capacity of Redditch Borough. This fact is evidenced in other RBC evidence base documents. | None |
| | 267/578 Barton Wilmore | There is no reference within the Core Strategy as to what constitutes a "Strategic Site" and this is not defined by PPS12 either. | The PDCS describes strategic sites as per PPS12 as locations for strategic development that are considered central to the | Include 'Strategic Sites' in the Glossary |

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| | | Note that Redditch have chosen to identify all proposed allocations as “strategic sites” and query whether all of these sites are “central” to the achievement of the Core Strategy as set out in PPS12. | achievement of the Core Strategy. A definition will be provided in the Glossary.<br><br>The strategic sites identified in the PDCS are not all of Redditch’s allocation, these will be identified in the Site Allocations and Policies DPD. The Strategic sites are central to the achievement of the Core Strategy Vision, and in particular, some of Redditch’s larger development sites are included because of the limited choices about where development can be located. | None. |

## *Open Space Needs Assessment*

| **Policy/ Issue/ Para/ Doc** | **Respondent No./ Representation No.** | **Summary of comment** | **Council’s response** | **Council’s proposed action** |
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| Open Space Needs | 180/299 | The former playing field at the rear of No. 96 – 108 (adjacent | After analysis of the GIS and Open Space Needs | Officers to contact respondent for specific plan illustrating |

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| Assessment | | to Terrys Memorial Field) should be recognised as Open Space due to its use by the local community. | Assessment Officers are not clear on the exact location of the open space referred to. | open space referred to. |

## *Policy SP.3*

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Policy SP. 3 | 021/ 074 | Policy SP. 3 generally accords with published WMRSS Policies T1, T2, T3 and T5 in particular and other relevant emerging policies. | Noted. | None. |
| Policy SP.3 | 027/ 473 | Support for Policy. | Support Noted. The principles of this Policy would still be incorporated in the Core Strategy however they will need to be repackaged. | None |
| Policy SP.3 | 049/ 731 | Paragraph (iii) of the reasoned justification should include the use of Site Waste Management Plans. | A sentence will be included within this paragraph that makes reference to the use of Site Waste Management Plans. | A sentence will be included within the introduction to the Natural Environment Policy which states that *"The use of Site Waste* |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | | | *Management Plans helps to support the facilitation of waste management processes that are in accordance with the waste hierarchy. Central Government sets out that a SWMP should be used on schemes over £300,000."* |
| | | The final sentence of paragraph (ii) of the reasoned justification should be reworded as it fails to convey ideas on composting and recycling. | This Policy has been amended and these requirements now sit within the 'Natural Environment' Policy. A sentence will be included within the introduction to this policy which reads; *"The Borough Council supports the 'Waste Challenge' initiative which encourages waste minimisation by retaining waste at home <u>through schemes such as recycling and composting</u>".*<br><br>The Waste Challenge is an initiative run by Redditch Borough Council, which seeks to reduce the amount of waste in the Borough. More information can be found on the Councils webpage. | Sentence to be included in the introduction to the Natural Environment Policy which reads, *"The Borough Council supports the 'Waste Challenge' initiative which encourages waste minimisation by retaining waste at home <u>through schemes such as recycling and composting</u>".* |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | Recommend the inclusion of the phrase 'Green Infrastructure' within Point (vi) of the policy wording. | This principle of Policy SP.3 is now contained within the 'Natural Environment' Policy. A sentence will be included within this policy. | Insert sentence *"protect and enhance the quality of natural resources and green infrastructure resources in the Borough including water, air, land, habitats and biodiversity"* in the 'Natural Environment' Policy. |
| | | Within criteria (viii) the word 'environment' should be included after the word 'historic'. | Comment noted. The word 'environment' will be included after the word 'historic' where this is deemed appropriate. | Include the word 'environment' after the word 'historic' where this is deemed appropriate. |
| | | Policy wording in (iv) conflicts with policy wording in BE.2 B, recommended that wording in SP. 3 (iv) is amended to reflect the wording in BE.2 B. Also the final sentence in paragraph (iv) of the reasoned justification should be amended to make clear that other forms of SUDs exist. | Policy wording in (iv) will be amended to reflect that in BE. 2 B, as this is indeed the correct wording. This text will be within the 'Natural Environment' Policy, which will replace Policy SP.3. The final sentence in paragraph (iv) of the introduction to the Natural Environment Policy will make it clear that there are other forms of SUDs techniques available. This text will be included in the 'Climate Change' Policy. | The Natural Environment Policy will read that *"Every new development will require the inclusion of Sustainable Drainage Systems (SUDS)."*<br><br>The introduction to this Policy and the Policy relating to Climate Change will state that *"SUDS that use infiltration techniques are not suitable in Redditch due to the underlying geology; however techniques that are appropriate use detention/ retention methods these include greywater recycling,* |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | | | *rainwater harvesting, green roofs, permeable surfaces, swales and ponds."* |
| | | Part (v) of policy wording should reflect the wording in Policy BE.1 Climate Change. | Policy SP.3 has been divided into a number of other policies. With regard to the need for renewable energy production, this will be focused in the Climate Change Policy, in which the wording within BE.1 will be used. | None. |
| | | Amend wording within paragraph (vi / vii) of the reasoned justification to *"to enhance and maintain statutorily and locally designated historic assets (historic buildings, historic landscapes, including Conservation Areas, and archaeological sites)".* | This text has been moved into the Introduction to the Natural Environment Policy, the suggested wording will be incorporated into this. | Amend wording to reflect that suggested. The introduction to the Natural Environment Policy will read *"to enhance and maintain statutorily and locally designated historic assets (historic buildings, historic landscapes, including Conservation Areas, and archaeological sites)".* |
| | | Also it is unclear why paragraphs (vi) and (vii) in the reasoned justification are grouped together. | It is considered that points (vi), (vii) have been addressed separately within the reasoned justification but put in the same paragraph. This will be amended in the Submission Core Strategy; | Points (vi), (vii) of the Reasoned Justification will be considered separately within the introduction to the Natural Environment Policy. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | | both points are considered in the Natural Environment Policy. | |
| | | It is also unclear where point (viii) of the policy has been addressed in the reasoned justification. | It is considered that Point (viii) of the Policy does not need to be addressed in the Reasoned Justification as there is nothing more to say with regard to this aspect of the policy. | None. |
| Policy SP. 3 | 088/ 534a | Support the inclusion of defined sustainability principles within the Core Strategy. | The principles of the Sustainability Principles Policy have remained in the Core Strategy, however these have been repackaged into a number of other policies for example the Climate Change Policy and the Natural Environment Policy. | None. |
| Policy SP. 3 | 088/ 534b | Recommend reference to existing sustainability frameworks, including in particular the Regional Sustainable Development Framework and the West Midland's Sustainability Checklist. | The Regional Sustainable Development Framework was considered when preparing the policy and has informed the technical papers which in turn inform the policy.<br><br>The West Midland's Sustainability Checklist features more heavily in | Ensure the Regional Sustainable Development Framework informs the 'Green Strategy' Technical Paper and in turn the content of the policy. |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | | Policy BE. 1 Climate Change in which it is required to be considered and does not warrant repeating in Policy SP. 3. | |
| Policy SP. 3 | 088/ 534c | We recommend that point v *"incorporate sufficient renewable energy production facilities and principles of sustainable design and construction"* be amended to focus solely on energy and climate change – sustainable construction is covered under point iii. | Sustainable design and construction policy has a number of principles within it which need to be applied to new developments in Redditch. One of these principles focuses on renewable energy production.<br><br>It is necessary to consider sustainable construction in number of policies, as combating climate change is a key theme within the Core Strategy. | None. |
| Policy SP. 3 | 088/ 534d | Point v should reflect the energy hierarchy by requiring all proposals to reduce energy demand and incorporate energy efficiency measures, as well as to include sufficient renewable energy production. | It is considered that the energy hierarchy should be incorporated within the Core Strategy as the energy hierarchy is important to reduce energy use first in new developments. It is considered that the Climate Change Policy is the most appropriate location for implementing the energy | Incorporate the principles of the energy hierarchy into the Climate Change Policy. |

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| | | | hierarchy. | |
| Policy SP. 3 | 088/ 534e | With regard to point iv, due to underlying geology of the Borough, infiltration techniques for SUDs are impractical. The range of SUDs is very wide, including swales, reed beds, permeable paving and green roofs. It would be helpful to clarify what types of SUDs may be practical in the given circumstance. | It would be appropriate to detail the techniques of SUDs that are appropriate in Redditch. It is considered that the most appropriate location for this detail will be detailed in the introduction to the Climate Change Policy. | Include, in the introduction to the Climate Change Policy techniques of SUDs are appropriate for use in the Redditch circumstance. For exact wording see response to 049/731. |
| Policy SP. 3 | O88/ 534f | Point vi reflects the consideration of Strategic Environmental Assessment, which are welcomed. However, the issues around the different subjects within this are likely to vary significantly. It is recommended that the protection and, where possible, betterment of water, air and soil become one point, with the protection and enhancement of biodiversity and landscape as another | It is considered that it would be appropriate to split the issues of water, air and soil and biodiversity and landscape into two separate points to clarify the policy further. These principles now come under the Natural Environment Policy. | Split up water, air and soil as one point and biodiversity and landscape as another. Principles in Natural Environment Policy to read *"protect and enhance the quality of natural resources including water, air and land."* And *"Protect and enhance habitats and biodiversity."* |
| Policy SP. 3 | O88/ 534g | The justification around biodiversity should include | It is considered that a full definition of Biodiversity will be | Include a full definition of Biodiversity in the Glossary which |

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| | | protected species, BAP priority habitats and species and 'everyday' biodiversity, as well as designated sites. | provided in the Glossary to the Core Strategy and therefore the aspects will be considered there. | reads *"The Biodiversity Action Plan (1994) defines Biodiversity as "the variety of life forms we see around us. It encompasses the whole range of mammals, birds, reptiles, amphibians, fish, insects and other invertebrates, plants, fungi, and micro-organisms such as protists, bacteria and viruses".* |
| | | The term biodiversity should be taken to include habitats, and this does not have to be repeated. Terms such as biodiversity could be defined in a glossary to avoid confusion. | The term Biodiversity will be explained within the glossary. | The following will be included in the introduction to the Natural Environment Policy. *"There are a range of nationally and locally important sites of biodiversity within Redditch Borough which should be maintained and strengthened through the actions of Local Authorities and other."*<br><br>Insert the following definition of biodiversity within the Glossary, *"The Biodiversity Action Plan (1994) defines Biodiversity as "the variety of life forms we see around us. It encompasses the whole range of mammals, birds, reptiles, amphibians, fish, insects and* |

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| | | | | *other invertebrates, plants, fungi, and micro-organisms such as protists, bacteria and viruses". There are a range of nationally and locally important sites of biodiversity within Redditch Borough which should be maintained and strengthened through the actions of Local Authorities and other."* |
| Policy SP. 3 | 088/ 534h | Advocate the inclusion of a requirement to contribute towards green infrastructure. | The importance of the components of Green Infrastructure is a key theme that runs through the Core Strategy, therefore it is considered in a range of policies. Support noted. | None. |
| Policy SP. 3 | 091/ 131 | There is no reference in policy to providing the general infrastructure required to support a development. | Policy SP.3 does not exist in this form in the Core Strategy, however many of the principles of the policy have remained and are contained within a broader 'Natural Environment' Policy; it is considered that it would not be appropriate to refer to infrastructure requirements within this natural environment policy. However, infrastructure is very | None. |

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| | | | important to the delivery of the Core Strategy and therefore is a key theme that is referred to throughout the document. | |
| | | There is no reference to the Sustainable Communities Strategy theme of 'Safer Communities.' | As stated above as this policy now takes the form of the 'Natural Environment' Policy it is not deemed appropriate to refer to the 'Safer Communities' theme, this theme is considered significantly in other areas of the Core Strategy. | None. |
| Policy SP. 3 | 212/ 351 | Objective vi) (protect and enhance the quality of natural resources) is welcomed; however geodiversity should be listed alongside biodiversity in this context. | Please see response to 049/ 735. | Please see action to 049/ 735. |
| | | The supporting text on page 30 should go further to say that decisions on development and land use will be assessed against their integration of and benefits to, biodiversity and geodiversity. | Agreed. | Insert principle into the Natural Environment Policy, which states, *"All development schemes in the Borough will be expected to integrate with and enhance biodiversity and geodiversity."* |
| Policy SP. 3 | 262/ 407 | Support for Policy. | Support noted. The principles of | None. |

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| | | | this Policy are still contained within the Submission Core Strategy however they have been repackaged. A number of the principles are contained within the 'Green Strategy' of the Core Strategy, while the remaining principles are contained within the Delivery Strategy. | |
| Policy SP.3 | 093/ 490 | <u>Waste</u><br>Efforts should be made to reverse the growth in waste, recover the maximum resource value from the waste produced, and accelerate progress in delivering increased waste management capacity.<br><br>The consideration of commercial and industrial waste is essential. Waste collection systems which aim to minimise waste at source should be adopted throughout the Borough. Waste minimisation should also be incorporated.<br><br>The WEEE Directive 2002/96/ EC and 2003/ 108/ EC should be included in the list of relevant | It is considered that these processes, although sustainable, are outside of the remit of the Core Strategy.<br><br>It is considered that by requiring new development to consider the waste hierarchy that the Core Strategy promotes, as much as possible, the need to minimise waste.<br><br>These two directives have been reviewed and it is considered that there are no implications for the | None.<br><br>None<br><br>None. |

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| | | plans.<br><br>The LDF Framework should be regularly updated as more information becomes available.<br><br><br><br><u>Water management</u><br><br>Point iv needs to be amended so that the words 'where possible' are removed to make the requirements for SUDS and methods for water efficiency stronger and that reference is made to achieving betterment to the flooding regime. Suggested wording might be *'not increase the risk of flooding in the site or elsewhere, seeking betterment to the flooding regime, and incorporate SUDS and other methods of water efficiency.'*<br><br>It is acknowledged that overall the underlying geology of the area may not be conducive for SUDs; | Core Strategy.<br><br>The Scoping Report is reviewed annually. Development Plan Documents are reviewed whenever it is deemed necessary.<br><br><br><br>Since the production of the Preferred Draft Core Strategy the Strategic Flood Risk Assessment Level 1 has been finalised, this document states that SUDS techniques must be used. The document goes on to detail the SUDS techniques that would be suitable for use in Redditch. The findings from this document will be incorporated into the Submission Core Strategy.<br><br>The Submission Core Strategy can make reference to the need for all sites to use SUDs | None.<br><br>None.<br><br>None. |

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| | | however any site brought forward for development should have undertaken a more detailed site investigation to inform SUDs techniques, with all appropriate techniques considered.<br><br><u>Contaminated Land</u><br><br>Point Vii should be amended to read 'where required' instead of 'where appropriate'.<br><br>Reference could be made to Table 2.1 In Annex 2 of PPS23. | techniques and refer to the methods of SUDs that are suitable in Redditch.<br><br>This Policy will be split up, however where appropriate the text will be amended in line with recommendation.<br><br>Any new development or proposal in the Borough is required to be in accordance with all national planning policy; therefore Table 2.1 in Annex 2 of PPS23 will be required to be considered. | Amend text to read 'where required' instead of 'where appropriate'.<br><br>None. |
| Policy SP.3 | 102/ 148 | Criteria (viii) should state to *'protect and enhance historic environment and cultural heritage…'* As one of the definitions of historic environment is that it is not limited by cultural associations. | This will be included elsewhere in the Core Strategy. | None. |

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| Policy SP.3 | 263/ 435 | Welcome the inclusion of part (viii) as part of this policy. | Support noted. | None. |
| | 103/164(a) | The requirement to improve the quality of water, air, soil and water resources would be best achieved by a complete overhaul of the bus routes to reduce congestion. | The location of the bus routes is not within the control of the Borough Council; it is under the control of private transport companies, although the Council do advise the Bus Companies on where they think bus routes should be considered. | None. |
| | | The construction of two major water holding areas adjacent to the River Arrow, and a facility to compost waste and add it to the remaining agricultural areas as an alternative to fertiliser. | The need for water infrastructure in the Borough has been considered by a Water Cycle Study and via discussions with the water infrastructure providers.<br><br>Composting is a sustainable approach to waste management ad is continually promoted by the Waste Management Department within the Council. The Core Strategy cannot require composters to be provided as this is too detailed for the Core Strategy. | None. |

***Procedural***

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| | 028/104; GOWM | Concern that the Core Strategy does not set out a strategy for the development of Redditch but contains a number of criteria based, development control policies, more appropriate to old style local plans, due to the topic based approach. Recognise that there are elements of a strategy in some of the policies but they need to be brought together in order to provide a coherent approach to delivering the vision. | The vision has emerged with eight key strategies, 13 objectives and are these are carried forward into strategies forming the core policies which include:<br>• Green Strategy<br>• Enterprise and Skills Strategy<br>• Retail and Centres Strategy<br>• Sustainable Settlements Strategy<br>• Balance Between Housing and Employment Strategy<br>• High Quality and Safe Design Strategy<br>• Attractive Facilities Strategy<br>• Historic Environment Strategy<br>• Infrastructure | Amendments to the vision and other miscellaneous amendments to the style of the relevant policies in the Core Strategy. |

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| | | A fundamental element of the LDF system is its emphasis on delivery. The Core Strategy should, therefore, have a positive approach, setting out what is proposed for the Borough and how it is to be implemented in order to achieve the vision. | The strategies that have been developed incorporate previous draft policy provisions but have been redrafted so that there is a shift away from the development control based policy and so that a coherent approach to delivering the vision is achieved in accordance with PPS12.<br><br>The Preferred Draft Core Strategy included a draft Delivery Strategy, and it is the intention of Redditch Borough Council to restructure this and to supplement with information currently being assembled through a series of detailed infrastructure delivery meetings. The Delivery Strategy is intended to be accompanied by a comprehensive Infrastructure Delivery Plan (IDP) which will be updated annually and monitored.<br><br>There is a spatial vision which is | Prepare Infrastructure Delivery Plan.<br><br>Review policies to ensure that there is no unnecessary repetition. |

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| | | Concerned that the criteria in many policies are simply restating regional or national policies. Generic DC policies may be appropriate in a Core Strategy but they need to be locally distinctive. | locally distinctive, reflects the things that are special about Redditch, implements the spatial aspects of the SCS and is in general conformity with the WMRSS and in line with national policy. The Council will review policies against the WMRSS to ensure that there is no unnecessary repetition. | |
| | 028/108; GOWM | There is a significant risk that proceeding with the document in its present form would lead to it being found unsound. As a minimum, substantial presentational changes are necessary but there are probably underlying issues which need to be addressed. | Officers continue to liaise with GOWM to overcome these concerns. | Amendments to the vision and other miscellaneous amendments to the style of the relevant policies in the Core Strategy. |
| | 042/461; Stoneleigh | Because of the Council's reluctance to address the issue of housing and employment land provision in full, and, in particular, cross boundary growth, real progress in the | RBC has taken a proactive approach in presenting alternatives to the designations of land for housing and employment uses based upon the latest evidence available; therefore it is | No change |

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| | | Core Strategy will be delayed until, at the earliest, the publication of the EIP Panel Report into the Phase Two Revision. This approach is contrary to the advice set out in PPS12.<br><br>The Core Strategy will not be achieved in a timely and efficient manner (as stated in PPS12) because of the approach currently taken toward the identification of development land. This will result in unnecessary delay in the delivery of new homes and land for employment and inward investment in new jobs, required to meet both local and sub-regional needs.<br><br>Because there are no arrangements in place to produce a Joint Core Strategy between the three 'affected' | not accepted that there has been any reluctance to address the issue.<br><br>The short delay is not related to any inadequacies in the approach. The Core Strategy will respond to the RSS Phase Two Panel report issued in September 2009.<br><br>Agreed that the Core Strategy should set out how the cross boundary growth would be accommodated in broad terms. | No change.<br><br>Redraft cross-boundary elements of the Core Strategy. |

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| | | LPAs, the PDCS should, at the very least, set out how the cross-boundary growth of Redditch might be accommodated and delivered. This would be consistent with the advice in PPS12 (para 4.46) which states that Core Strategies should show what 'alternative' strategies have been prepared to deal with the uncertainties surrounding the deliverability of the strategy. | | |
| | 042/464; Stoneleigh | The current LDS anticipates consultation on the Submission Core Strategy will take place in October/November 2009. However, the PDCS states that the cross boundary requirements are to be determined via the EIP into the Phase Two Revision of the RSS with the subsequent published strategy is unlike to emerge before Spring 2010. | The Core Strategy will respond to the RSS Phase Two Panel report issued in September 2009. It was considered timely to consult on the WYG study alongside the Preferred Draft Core Strategy so that comments could be made comprehensively. | No change. |

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| | | That would delay the Submission Core Strategy by six months notwithstanding that consultation on the recommendations on the WYG study could have been undertaken now with the opportunity to reflect those consultations in responding to the Secretary of State's proposed changes to the Phase Two Review. | | |
| | 042/465; Stoneleigh | PPS3 & PPS12 encourage the consideration of options or alternatives in the preparation of LDDs. PPS3 encourages early dialogue with stakeholders, developers and infrastructure providers about these options and the most appropriate strategy for growth. The Council have the opportunity through the Core Strategy to do this. The PDCS does no more than indicate, in | The site boundaries of any SUE were not determined at the time of publishing the PDCS. In terms of the scale and range of uses appropriate for any SUE, an indicative figure for residential development and associated infrastructure as well as potential employment land was provided in the introductory sections. These figures were however based upon the WMRSS Phase Two Revision requirements in the | Redraft cross-boundary elements of the Core Strategy once the Panel Report for the WMRSS has been received (due Sep/Oct 09) |

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| | | general terms, on the Key Diagram the preferred direction for growth without giving any information about the scale of development, the range of uses to be included in any scheme and the programmed development of the site to ensure that the requirements for housing and employment land are met. | Preferred Option Document (2007) and on the estimated SHLAA capacity of the Borough. The programme of development will be indicated once the precise implications of a SUE are investigated further. | |
| Procedural | 044/118; Shire consulting c/o Barclays Bank | Policies in the emerging Core Strategy or any DPDs must be founded on a robust and credible evidence base (PPS12). Neither the Local Plan nor the background documents to the LDF appear to contain evidence for the choice of percentages for the non-A1 uses specified under the saved policies of the local plan (PPS6) and approach must change. No planning reason to restrict Bank's | Comments noted however this is already an adopted plan policy and isn't within the emerging core strategy policies. | |

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| | | presence at ground floor level in primary shopping frontage. Encourage flexibility to allow changes of use between A1 and A2. | | |
| Procedural | 104/001; RPS | (In specific reference to WYG Studies) The evidence base is incomplete in that it has not assessed the full range of strategic development alternatives available. A core strategy based on this study will be found unsound against PPS12; it will have prejudiced stakeholder interest.<br><br>Retrospective assessments are not appropriate, nor indeed permitted in respect of the Habitats Directive. (para 7.10) | At the time of the Preferred Draft Core Strategy being prepared and issued for consultation, it was not considered possible to include land within adjoining Bromsgrove District within Redditch Borough's SA or Core Strategy. A joint consultation period will resolve issues associated with these constraints.<br><br>Confirmation has been received from Natural England that the Habitats Directive has been adhered to and that the Screening identified that a full Appropriate Assessment would not be required. There have been no retrospective assessments. | Hold a joint consultation period with Bromsgrove District Council on the potential locations for cross-boundary development.<br><br>None |

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| | | The Sustainability Appraisal is extremely weak and not comprehensive enough to be considered a SA report. | The SA process has been undertaken by strictly applying the provisions of guidance contained in Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. The Borough Council has taken a practical approach to the SA process, by screening against the SA alongside each Core Strategy stage to give an indication of the likely significant effects associated with different options or approaches and also by taking the further step of attempting locational SA, usually only required as part of EIA of sites. | None. |
| | 104/003; RPS | Developers and their agents were not made aware that the WYG Phase 2 study had been commissioned despite previous involvement in the process. It is noted from the project brief for the consultants that no | It was important that the consideration of all possible development options was not constrained. This would have been the case had the WYG Joint Study considered the site development boundaries of | No change. |

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| | | consultation was intended on this report. Disappointed that WYG did not take up the offer to discuss proposals for North West Redditch. Received advice from WYG that they were not opening discussions with interested parties in an effort to remain impartial and to provide independent advice. | options put forward by prospective developers/landowners. It is therefore appropriate that the WYG study did not consider the specific area noted as the North West Urban Extension in isolation. Consultation on the report has been included, despite it not being required. | |
| | 104/025 RPS | Refers the Council to para 3.31 of 'Using evidence in spatial planning' (2007) regarding judging the adequacy of the evidence base. RPS is of the opinion that the Council's evidence base is demonstrably not significant. | Respondents have raised an important matter, and it would be expedient to respond to paragraph 3.31 directly, which states "This is unlikely to be a matter that guidance can ever prescribe exactly. Inspectors' reports will provide useful illustration, but this is also a matter for professional judgement. What is clear is that confidence cannot come entirely from answering the question, "Have we enough evidence to proceed to the next stage?", but | Re-draft cross-boundary elements of the Core Strategy. |

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| | | | has also to be informed by looking back and asking "Is there sufficient evidence for the position we are taking?" Evidence cannot be used instead of judgement; it must be used as a knowledge base to inform judgement. It is essential that 'sufficient' is considered not just in terms of quantity but in terms of its quality and ability to stand up to rigorous testing." Redditch Borough Council reiterates that at all stages of the development of the Core Strategy that the best available evidence has been used to inform either the range of options or the preferred approach. The evidence from WYG at the time of the preferred draft core strategy being published was the most comprehensive evidence available for informing choices regarding development options. At the time of the issues and | |

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| | | | options the evidence available suggested that the ADRs would be the Borough Council's only alternative development options to make up for the identified shortfall of development found within the urban area. The Council accept that the WYG recommendations contrast with the previous findings in the Analysis of GB Report but having reviewed these and previous findings, the Council concluded that there are cogent reasons for this latest independent assessment and that the recommendations contained in the Stage II Report relating to Bordesley Park can be given significant weight. | |
| | 104/038 RPS | The Council has failed to undertake a comprehensive and robust approach to identifying and appraising strategic options and | Alternatives have been assessed through the Issues and Options stage and in the accompanying SA Report; when informing the preferred options and in the | None |

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| | | alternatives. The current approach is therefore unsound and a detailed assessment of strategic alternatives should be undertaken prior to the submission of both Core Strategies. | accompanying SA Report and also when evaluating evidence as it becomes available. | |
| | 104/039 RPS | All reasonable alternatives should be subject to full public consultation and a comprehensive SA incorporating SEA. Failure to assess and present this appraisal information to stakeholders along with illustrating by way of a thorough paper trail, the manner in which the preferred option has been selected with regard to alternative options, is unsound. | See response to 104/038 | |
| | 104/048 RPS | The Council is duty bound to undertake and additional round of consultation on the strategic options for Redditch before | Further consultation is planned for February - March 2010 jointly between Bromsgrove and Redditch. | No change. |

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| | | Submission of the Core Strategy in order to achieve the specificity it requires. | | |
| | 200/325 Orme | Disappointed and unamazed that residents of Hoveton Close have not been formally advised of RBCs plans to deprive Greenlands residents of Public Amenity Space and only found out by chance. | The Core Strategy Consultation has been advertised in a number of ways including the Local Press, Council notice boards and a cinema advert. The SHLAA document has been available on the Council's website for the duration of the consultation period. A list of all SHLAA sites not in public arena was included in the Spring 2009 edition of the Council Magazine 'Redditch Matters'. | No change. |
| | 220/361; Forbes | Proposals in the SHLAA to the rear of Hoveton Close have not been advertised in the areas where the majority of people will see it. | See response to 200/325 | No change. |
| | 262/416; HCA | The White Young Green Stage II report is not accompanied by an appraisal of the sustainability credentials of | SA of background documents/evidence is not required. The WYG Second Stage Report is accompanied by | No change. |

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| | | each of the growth options for Redditch carried out using the sustainability criteria set out in the RSS. | a simple SA matrix which builds upon the draft SA completed for the Core Strategy. The SA matrix accompanying the WYG Report does not purport to be a formal assessment as it does not relate to either a plan or programme. However it was produced to provide a basis for assessing and understanding the sustainability implications of development in different locations. | |
| | 267/576 Barton Wilmore | The LPA has failed to identify sufficient land within its boundary to meet housing targets as set out in the emerging RSS. Consider that the proposed approach is inconsistent with the emerging RSS and therefore does not comply with Sections 19 (2)(b) and 24 (1)(a) of the Planning and Compulsory Purchase Act 2004. | The housing requirements as set out in the forthcoming WMRSS will be identified in the Core Strategy.<br><br>This is inevitable given the limited | Redraft Housing requirements policy to refer to the allocation of residential development from the WMRSS.<br><br>Re-draft cross-boundary |

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| | | Suggest that the proposed redistribution of housing figures to outside the Borough boundary is not justified by credible evidence and is therefore unsound.<br><br>With reference to Section 19(5) of the Planning and Compulsory Purchase Act 2004, the SA accompanying the Core Strategy fails to provide an adequate or balanced assessment of alternative options. As such there is insufficient evidence to demonstrate that the Preferred directions for growth are more sustainable than the ADRs or any other sites within the Borough boundary. | capacity within the Borough and because of the implication of the Phase Two WMRSS.<br><br>RBC has assessed the relevant alternative options in the SA. | elements of the Core Strategy.<br><br>No change. |
| | 267/584 Barton Wilmore | The DPD is not backed up by robust or convincing evidence. The evidence is contradictory, with no justification for | The Green Belt and ADR Study undertaken by the Borough Council does not pertain to be an assessment of suitability; the | No change. |

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| | | preferring the conclusions of one document over another. | nature of this document differs from that of WYG 1 and WYG 2. All evidence will be used to help to justify a preferred option. | |
| | 267/585 Barton Wilmore | It is clear the document is not based on fact and that the assumptions made are not reasonable or justified, particularly in light of a report (Green Belt/ADR Study) which confirms the Council's previously held view that land at Webheath is suitable for development. | It is not clear what aspect of the Core Strategy is factually incorrect. The policy stances of the Preferred Draft Core Strategy reflected the most up to date evidence base information. The Study referred to by the respondent is a review of the history of relevant sites. | No change. |
| | 267/589 Barton Wilmore | The emerging DPD is contrary to PPS3 in that it fails to provide sufficient land to meet its housing requirements. The Council has stated that there are more suitable sites for development within Bromsgrove District, however this does not absolve the Council of its responsibility to meet its housing requirements. | The housing requirements as set out in the forthcoming WMRSS will be identified in the Core Strategy. | Redraft Housing requirements policy to refer to the allocation of residential development from the WMRSS. |

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| | | There are sites within the Borough which meet the tests of paragraph 54 of PPS3 in terms of their suitability for housing and as such these sites should be considered in advance of land outside of the administrative boundary of the Borough. | | |
| | 267/590 Barton Wilmore | The Core Strategy document as a whole is unsound as it does not meet any of the tests of PPS12. On the basis that the development strategy and underlying principles are fundamentally flawed, we do not consider that the Core Strategy can be progressed in its current format. | There is no recognisable flaw in the Core Strategy based upon the tests of PPS12. The Core Strategy will be progressed and submitted in confidence that the tests of soundness are met. | No change. |
| | 267/591 Barton Wilmore | Surprised at the weight attributed to the WYG Report given its self-evident flaws. | A decision was made to use WYG conclusions to inform what was consulted upon in the Preferred Draft Core Strategy as an alternative strategy which was the most up to sate evidence | No change. |

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| | | | available at the time. | |
| | | Weeks before publication of the Core Strategy Redditch Borough Council advised that the Webheath ADR would be included as a strategic site. | Evidence available to Redditch Borough Council before the WYG Report indicated that all of its ADR sites would be suitable for development, hence it being presumed so at Core Strategy Issues and Options Stage. | No change. |
| | | The Council have given insufficient time to properly consider conclusions of WYG report and its implications for the wider regional area. | Redditch Borough Council must take account of the latest and the most comprehensive evidence available which was the WYG Report. If Redditch Borough Council ignored this evidence and it was not use to inform the Core Strategy, the alternative development scenarios would not have been consulted upon. There is sufficient time to consider all comments, new evidence and the outcomes of the WMRSS Phase Two Panel Report. | No change. |
| | 267/592 Barton | An offer was made to supply all | WYG Report was intended to be | No change. |

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| | Wilmore | relevant information to WYG relating to Webheath ADR to enable a comprehensive review to be undertaken, but the offer was turned down. | a completely independent comprehensive assessment. Also it was important that the consideration of all possible development options was not constrained. This would have been the case had the WYG Joint Study considered the site development boundaries of options put forward by prospective developers/landowners. | |
| | 267/595 Barton Wilmore | WYG Report - There is inconsistency in approach and conclusions inaccurate. Balance towards Bordesley Park and Foxlydiate Woods sites suggests the conclusion has informed the report rather than the report leading to the conclusion. Do not consider that weight can be attached to the document. It cannot form a basis for a development strategy. | There are no identified inaccuracies in the WYG Report.<br><br>It is accepted that the report focuses on the Bordesley Park option as the preferred option and Foxlydiate Woods as an alternative option, presumably because there was certainty over these locations being the most preferable after considering the constraints on all sites. | No change.<br><br>No change. |

## *Retail*

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| | 017/240 | CPRE approve of the following policies - Strategic Sites, Regeneration of Town Centre, Policy SP4 and District Centre Redevelopment, Policy SP5. | Noted | None |
| | 021/075 | Policies SP4 and SP5 accord with emerging WMRSS policies PA12A and PA13 respectively. SP4 also aligns with published WMRSS Policy UR3. | Noted | None |
| | 021/087 | ES5 accords with emerging WMRSS policies PA1 and PA12B | Noted | None |
| | 021/088 | ES6 generally accords with emerging WMRSS Policy PA12A but the Core Strategy Policy should be explicit that | Agreed | Amend Policy ES6 to make clear that the floor space requirements are for the Town Centre which is the preferred |

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| | | the Town Centre is the preferred option for this floor space. | | location from;<br><br>***The Borough Council seeks to plan for approximately 30,000sqm of comparison floorspace for the period up until 2021 and aim to make provision for an additional 20,000sqm floorspace between 2021 and 2026.***<br><br>***to;***<br><br>***The Borough Council seeks to plan for approximately 30,000sqm of comparison floorspace for the period up until 2021 and aim to make provision for an additional 20,000sqm floorspace between*** |

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| | | | | ***2021 and 2026 within the Town Centre.*** |
| | 021/089 | ES.7 (A5 uses within District Centres) is not of regional significance | Noted. A5 uses within the district centres and the cumulative impact of these uses are a locally distinctive issue for Redditch and therefore should be monitored through a Core Strategy Policy | None |
| | 024/109 | Well written – support for phasing of development in the Town Centre | Noted | None |
| | 044/117 | Supports intentions set out in 'Economic Success that is shared by all' however concerned that the draft policy approach fails to reflect the important role played by financial services retailers in promoting vitality, underpinning Town Centres and assisting in | Comments are noted however there are no policies within the core strategy that specifically relate to the restriction of A2 Uses within Town Centres. Local Plan Policy E(TCR).5 does not restrict financial uses completely however merely controls the number of uses | None |

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| | | regeneration. Local Plan Policy E(TCR).5 restricts financial uses in the town centre however circular 03/2005 states the financial services sector is' very much a part of the established shopping street scene, and which is expanding and diversifying…..(being)….. uses which the public now expects to find in shopping areas' Supported by WYG study.<br>This approach should not continue in the core strategy as it goes against government and borough objectives. A2 users can provide a high level of investment in, and maintenance of their premises resulting in attractive and active street frontages that can | within the primary retail area. | |

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| | | also foster significant footfall and pedestrian activity therefore benefiting the town centre. | | |
| | 080/119 | Land at Edward Street would be an ideal site for 'Redditch Heritage Museum' with a small urban park and facilities for coaches. | The Edward Street Site is currently covered by Policy E(EMP).5 in the Borough of Redditch Local Plan No.3 which states that the site should continue to be used for employment purposes and where this is not economically viable then housing could come forward. The Retail and Leisure Needs Assessment recommends retail use on the site only if other named sites in the Town are found unsuitable for retail. Therefore using the site as a Heritage Museum would be contrary to current | None |

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| | | | planning policy. | |
| | 085/520 | Supports the strategic vision and objectives however objective 8 should acknowledge the importance of improving established retail facilities within the town centre, including the kingfisher through investment and complimentary development. The retail needs of the town should be properly understood, WYG study should be supplemented by a market focussed assessment of retail provision in the town, particularly in respect of comparison retailing. | Whilst the Borough Council agrees that this is important, there are many contributory factors that would improve the vitality and viability of the town centre which cannot all be referenced in a core strategy objective. | No change |
| | 085/521 | Recognise that the town centre is part inward looking and poorly connected. Long term strategic initiatives | Agree with the respondents comments about the Town Centre. It is important to note that the Council has an | Seek to implement Town Centre Strategy priority projects and actions. |

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| | | should be explored to improve connectivity between the key areas and the prominence of the retail core. Short to medium term external signage should be considered and improvements to the external treatment of the shopping centre. | adopted Town Centre Strategy which broadly includes the following;<br>• Analyse information from the Retail and Leisure needs survey of the Borough<br>• Make recommendations based on the above survey, having regard to relevant national, regional and local planning policies and guidance as well as emerging Council priorities and Town Centre initiatives<br>• Articulate a vision for the Town Centre and establish a | Revise Town Centre policies to take on board the Town Centre Strategy recommendations.<br><br>Revise the vision to take into account the Town Centre Strategy recommendations. |

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| | | | common goal which will guide development and growth<br>• Establish an Action Plan to implement the Strategy<br><br>The study identified a number of short term 'wins' and more long term strategic objectives. More detailed information regarding the above can be found in Section 8.5 Priority Projects and Actions of the Town Centre Strategy. The vision for the Town Centre is therefore well established and this can be reflected in the Core Strategy. | |
| | 085/523 | Supports the principle of | Comments are noted | None |

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| | | identifying strategic development sites however the core strategy should not prescribe limited land uses for each site within the town centre, it should state that any number of town centre uses are appropriate. Car park 4 is capable of being developed for a number of uses and convenience retailing should be directed there prior to Church Rd/North West Quadrant – areas which are dislocated from the comparison offer. The document should acknowledge that all new retail development should satisfy a clearly identified need and demand. | however a balance of uses is needed within the town centre, stating that all uses could be allowed would undermine the Centre. Reference to identifying a clear need and demand would be a repetition of National Planning Policy in PPS4. | |
| | 085/526 | It's considered that the recession will have a | Noted. The amount of retail to be | None. |

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| | | negative affect on future retail spending. Consider that the comparison floor space figure identified in Policy ES6 will overstretch retailing in the Borough and adversely impact on the health of the retail core and surrounding centres. CS should acknowledge positive role investment in the Kingfisher centre can play and the centre should be promoted and recognised as an appropriate location for further retail development if proven to be appropriate. | accommodated in Redditch is allocated by the West Midlands Regional Spatial Strategy. The evidence in support of this requirement included a refresh to the Regional Centres Study which took account of current economic circumstances. The Hierarchy of Centres promotes the Town Centre as the preferred location for main Town Centre uses. | |
| | 088/536 | Supports Policy SP4. Welcomes the promotion of accessibility and recommends that priority is given to sustainable modes of transport including walking and | Noted | Amend policy SP.4 from;<br><br>***promote excellent accessibility by a range of transport modes, incorporating*** |

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| | | cycling. | | ***any necessary infrastructure improvements***<br><br>***to;***<br><br>***promote excellent accessibility by a range of sustainable transport modes, incorporating any necessary infrastructure improvements*** |
| | 088/537 | Welcomes Policy SP5 however the policy could be more positively worded to actually promote the regeneration of the centres. | Noted however the policy at present actively promotes the regeneration of centres. | None |
| | 088/538 | Policy SP6. Welcomes requirements for sustainable access links and open space provisions. Within the | Noted | None |

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| | | context of Green Infrastructure connections to Arrow Valley Park and Local Nature Reserves to the west should be promoted and enhanced as a means of securing multi functional benefits. | | |
| | 088/552 | Supports Policy ES5 | Noted | None |
| | 088/553 | Supports Policy ES6 | Noted | None |
| | 089/517 | Objects to the wording of Policy SP4. The Policy should address objective 6 together with the 4 parcels of land. Suggest the elements in Policy ES5 Tier 1 associated with Town Centres are reflected in Policy SP4. To reflect objective 8 the policy should also contain a section on evening and night time economy to establish guidelines for a subsequent Area Action | Comments noted. An additional policy specifically relating to A5 uses within centres is also contained within the Core Strategy. | Look at the rewording of Policy SP.4 to include elements of Policy ES.5 and to reflect objective 8. |

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| | | Plan to improve and manage by controlling location and types of licensed premises and hot food takeaway to ensure harm is not caused to the neighbourhood. | | |
| | 091/132 | WMC welcomes part iii of Policy SP4 regarding safe and well designed places and buildings as it is fully in accordance with the guidance contained in PPS6. | Noted | None |
| | 091/133 | WMC endorses the requirement of Policy SP5 that all redevelopment proposals for new town district centres must design out crime and make the district centres feel safer. | Noted | None |
| | 093/494 | Any consideration of development on the Woodrow Strategic Site should take account of | Noted. As part of any development proposal these issues will be investigated at the | Review sites potential for water and foul drainage problems in the SFRA Level 2 and |

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| | | all the site and immediate proximity in terms of environmental infrastructure such as water and foul drainage. | Planning Application stage. If issues are identified on site following more detailed investigation in the Water Cycle Strategy refresh and Strategic Flood Risk the measures required for mitigation would be detailed in the policy and considered when assessing the deliverability of the strategic site. | WCS refresh. |
| | 099/142 | Developing retail units/food outlets in the area of Church Rd/North West Quadrant is not sustainable. People won't walk outside the Kingfisher Centre to shop and the lack of retail units near to the theatre and Town Hall would appear to confirm this. | These are Town Centre uses appropriate in these Town Centre locations. There is a need and demand identified for these uses in these locations.<br><br>Should housing come forward on these sites, | None |

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| | | Developments nearer to the Town Centre such as Edward Street and Church Rd should be aimed at families who cant afford to buy properties such as low cost fuel efficient flats to rent | dependent on the size there will be an element of social housing included along with green architecture to ensure efficiency. | |
| | 103/159a | RLNA argues that food stores should be trading company average sales at density. If this isn't the case then competition is necessary and this should be located close to the town centre. The study does not take into account Tesco or the fact Tesco and Sainsbury's have had permissions for mezzanine floors. In addition the study does not address why M&S has half the turnover of Tesco Express in Lodge | It is agreed that convenience offers would be preferable within or adjacent to the Town Centre. The study has considered the supermarkets with extensions and mezzanine floors and those with permissions for such extensions. There is no evidence to suggest that Marks & Spencers turnover in comparison to that of Tesco Express differs, indeed it is not within | None. |

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| | | Park and why Aldi and Lidl stores are not fulfilling this perceived need. Any new retailer would be located in a similar position to these two stores therefore they would have a right to claim the intro of another store would prejudice the current viability of the town centre. | the remit of the Retail Needs Assessment to detail this. | |
| | 103/159b | On page 58 of the RLNA no statistical basis given for the claim that the growth of internet shopping has peaked. Current financial conditions are likely to increase in internet shopping in order to get the best price which would greatly affect the high growth scenario figure. | Capacity assessment will be updated regularly as new information and forecasts are issued to ensure low growth and high growth scenarios are as accurate as possible. The report also states that 'e-tailing' is unlikely to replace the 'whole day out' shopping experience. | None |
| | 103/159c | The report claims there is a need for 28,000sqm | It is not the intention of the Retail Need | Investigate through Site Allocations DPD |

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| | | retail floorspace but fails to indicate how much of this could achieved by redeveloping existing spare capacity. There are a significant number of retail spaces available within the town centre. The study does not address the question 'how close are existing retail outlets to capacity trading?' | Assessment to determine the trading capacity of existing stores, in any case existing capacity would be considered when making site allocations. | |
| | 104/055 | The Council should establish the most appropriate strategy for the Borough that will provide the retail facilities in locations that accord with the evidence base. | The policies within the core strategy accord with the evidence base and are the most appropriate strategy for the Borough. | None |
| | 104/057 | Significant that the retail evidence may need to be revisited in light of additional housing growth emerging from the RSS. | The Core Strategy will reflect any changes made to the RSS following its examination. | Take account of changes to the RSS and reflect these in the Core Strategy. |
| | 106/166 | Developing retail | The development brief | None |

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| | | units/food outlets in the area of Church Rd/North West Quadrant is not sustainable and would compromise the existing centre. Future food convenience stores must be situated within the confines of Redditch Town centre. Fails to see how pedestrian links can be achieved from the site to the Town Centre. Church Rd should be developed for uses such as housing and or offices.<br><br>Agree with the redevelopment of Smallwood Health Centre however the report fails to mention how the Bus Depot will be redeveloped and will the adjoining buildings survive – needs clarification? The reports | for Church Rd sites encompasses a number of uses including housing and offices not just retail which has been supported by the Retail and Leisure needs Assessment. A balance of uses is required including convenience offer which is in line with need and demand as established in the Retail and Leisure Needs Assessment.<br><br>Leisure uses within the site does not necessarily mean it will be the same as the Abbey Stadium as there are a variety of leisure uses. | |

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| | | also states the site should be used for leisure needs however this will be in direct competition with the Abbey Stadium.<br><br>Does not support the removal of car park 7 and would like to see it restored. Demolishing this would contradict the council's recent decision on the Bates Hill application, given approval on the grounds of good parking nearby in the form of car park 7.<br><br>Does not agree with retail development on the Edward Street Site as it is too far out and would be incompatible with the retention of the locally listed buildings. The buildings should be retained, site tidied up | Car Park 7 is within private ownership and has recently been refurbished and brought back into use.<br><br>Edward Street is a gateway site to the Town Centre and the Edward Street SPD is still current. The brief does state that if employment is not economically viable then housing could be | |

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| | | and possibly used for housing or office. Is the Edward Street SPD still current?<br><br>Car park 4 is the most sensible option for retail development however the following pockets of land should also be considered;<br>• Old job centre Market area at the back of Debenhams | accommodated on the site. The Retail and Leisure Needs Assessment states the site could be accommodated for retail should other sites be unable to come forward. Officers will continue to monitor the site and for the locally listed buildings to be retained where ever possible.<br><br>These areas of land are being investigated and are also contained within the Redditch Town Centre Strategy. | |
| | 112/176 | Agrees with the redevelopment of the Town Centre and New Town District Centres | Noted | None |

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| | 116/181 | Disagrees with retail development on the Church Rd/NW Quadrant site as the Town Centre cannot sustain current retail provision.<br><br>Adequate car park provision is needed to serve the numerous doctor surgeries. Short term parking for those people visiting banks, insurance companies and Building Societies etc is needed without people having to walk through the Shopping Centre. Reinstate Car Park 7. | Figures are set by the region for retail and offices. The Retail and Leisure Needs Assessment identifies the sites for retail use.<br><br>Car parking study will be commissioned as part of the Town Centre Strategy to ensure adequate parking is in the right places. Car Park 7 has recently been refurbished and brought back into use | Commission car parking study as identified within the Town Centre Strategy but this is not likely to be evidence in support of the Core Strategy. |
| | 133/210 | Unsure of proposals to regenerate parts of Redditch Town Centre (Church Rd, Prospect Hill, and Car Park No.4) as this will spread the town centre out. | All of the sites stated within the respondents comments are within the defined boundaries of the Town Centre. | None |

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| | 135/217 | Agrees with the redevelopment of Church Hill centre | Noted | None |
| | 151/263 | Retail needs have shrunk considerably in the past year therefore the present provision negates the planned increase. | Noted. The number of houses, amount of employment land, retail and offices required to be accommodated in Redditch is allocated by the West Midlands Regional Spatial Strategy. The need for additional retail floor space has been clearly identified with the RNLA which demonstrates that provision is needed and can be sustained. | None. |
| | 153/513 | As public transport infrastructure can increase the accessibility of an area Centro recommends that development should be focussed in places that are well served by public | Agreed. Travel Plans will be a requirement of the delivery strategy of the submission core strategy. However travel plans will also be a requirement at the Development Control | None |

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| | | transport as outlined by the WMRSS Policy T2. A Travel Plan should be produced for new development to promote sustainable transport. Centro are happy to assist in any cross boundary issues. | stage as part of the validation checklist when an application is submitted. | |
| | 160/276 | There is no need for additional retail in the Town Centre as too many shops are vacant as present. The same applies to offices in Redditch as many are vacant and have been for several years. | Noted. The number of houses, amount of employment land, retail and offices required to be accommodated in Redditch is allocated by the West Midlands Regional Spatial Strategy. The RNA states that vacancy rates have dropped in recent years and currant rates do not give rise to any major concerns. | None. |
| | 160/278 | Agree with Prospect St and Edward St as strategic sites however they should not be for | Figures are set by the region for offices and retail that need to be accommodated | None |

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| | | shops and offices. Redditch needs a museum, gallery, open park areas, youth centres and toilets. The public need another reason to come to Redditch other than to Shop | therefore these uses would be priority. | |
| | 160/279 | Shops on the New Town District Centres are important and good for the environment whilst also being sustainable. However they do require public toilet facilities. | Comments noted | Inform DC for when redevelopment applications are submitted. |
| | 185/307 | Supports Matchborough Shopping Centre Redevelopment;<br>• Enclose the shopping centre<br>• Encourage local producers to provide fresh seasonal produce, new shops could | Comments noted although some aspects are not under the remit of planning. | None. |

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| | | be hardware, haberdashery etc<br>• Recreate original atmosphere with the pub<br>• Local Schools – supervision lies with school and parents if children are using the centre<br>• Smokers should not be allowed to converge into the public domain to smoke<br>• Landscaping could be improved around the church<br>Access and overflow car parks need to be redesigned to overcome parking issues. | | |
| | 208/344 | Noted that Policy ES6 refers to the need for comparison retail floorspace in the | There is no figure for convenience retail development within the WMRSS. In terms of | Revise RNA. |

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| | | Borough although it fails the need for convenience retail development in the main centres which is a requirement of PPS6 (paragraph 2.16)<br><br>In addition paragraph 2.16 indicates that once the need for retail development has been confirmed, LPA's should identify and allocate sites in accordance with the sequential approach. Therefore should a convenience need be identified within the Core Strategy sites should | PPS6 Para 2.16 there is no requirements for identifying the need for convenience retail in the same way as comparison retail. Since the PDSC was drafted, PPS4 has indicated that local authorities should identify "any deficiencies in the provision of local convenience shopping and other facilities which serve people's day-to-day needs". Therefore officers suggest that more detail is included in the refresh to the RNA.<br><br>The Site Allocations and Policies DPD is scheduled in the Local Development Scheme to commence production in February 2010. | |

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| | | then follow in associates site specific LDF documents. | | |
| | 223/366 | Support the identification of Edward Street as a Strategic Site in Policy SP4 but request further changes. Request that Edward Street is referred to as an area of land 1.15 hectares in accordance with the landownership on the adjacent site (shown on plan). Both sites offer an opportunity for comprehensive redevelopment over the site and to redefine land uses.<br><br>Policy SP4 should establish more detailed criteria for the redevelopment of the strategic sites as in Policy SP7. | Edwards Street boundary has already been established within the Development Brief. Should a comprehensive redevelopment come forward with the additional land this would be assessed on its merits and through the Development Control Stage.<br><br>Development Briefs have been written for the strategic sites and provide further detail to guide developers. | None |

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| | | Request the following changes to SP4:<br><br>Each of the four sites should be separated out into their own policies.<br><br>The policy for the Edward Street site should give more detailed guidance on redevelopment criteria and mix of uses. Housing, health and leisure uses should also be included within the policy text.<br><br>Reasoned justification for Policy SP4 should be changed and refer to the adjacent site with the total site area being refereed to as 1.15 hectares, | This is unnecessary because there is provision in policy to allow sites to come forward separately.<br><br>Agreed that more detail can be added to policy following the receipt of the Town Centre Strategy. Health and Leisure uses would however be inappropriate uses.<br><br>Total area will be re-calculated. It should be noted that there may be consequential revisions to the reasoned justification following suggested restructure to | |

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| | | | the Core Strategy. | |
| | 262/408 | Policy SP4 promotes the regeneration of Redditch Town Centre and establishes a list of objectives. The HCA supports the regeneration objectives proposed. | Noted | None |
| | 262/409 | The HCA supports the proposals in Policy SP5. The enhancement of district centres can promote stronger communities and can deliver sustainability benefits. | Noted | None |

## *Strategic Housing Land Availability Assessment*

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| SHLAA methodology | 029/715 (Tetlow King) | 1. Objection to manner in which sites have been assessed, resulting in a number of site groupings being excluded as a result of 'competing land uses' and new settlement proposals. At odds with the purpose of the SHLAA as in CLG Good Practice Guidance (2007) which states that *"It should aim to identify as many sites with housing potential in and around as many settlements as possible in the study area."* All land/ planning applications should be considered individually on their own merits and not excluded solely on conflicting land use proposals<br>2. Considers that para 1.4 of SHLAA introduction does not need to state that SHLAA <u>does not determine whether planning</u> | 1. Further to the CLG Good Practice Guidance (2007), PAS produced an additional guidance note (July 2008) to be read in conjunction with the CLG Guidance. Para 49 of the PAS note states that *"whilst the assessment will address whether sites are suitable for housing, this should only be taken to mean that they are suitable <u>provided they are not required for other purposes</u>"* [my emphasis]. Para 50 goes on to state that *"sites should not be included in the SHLAA which are not considered suitable or potentially suitable for housing. This would present confusing messages… Moreover, their inclusion could give unwarranted credibility to such sites."* Officers consider that the para 6.6 bullet points of the SHLAA offer sufficient justification for the exclusion of new settlement proposals and sites where conflicting land uses may be an issue. The | 1. None<br>2. None |

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| | | permission would be granted as there is no cause for this reference to be used as evidence to suggest Council support for residential development | SHLAA states that such sites will be investigated at an appropriate time to establish whether they might contribute to the SHLAA if deemed necessary.<br><br>2. Officers agree that the SHLAA does not necessarily need to make reference to the fact that the SHLAA is not a decision making document. However, for the purpose of clarity for all its readers, especially those who may not be familiar with the CLG and PAS Guidance Notes, such as local residents, officers consider that the inclusion of this reference does not detract from the methodology and overall purpose of the SHLAA | |
| UCS 5.20 – Land off Lady Harriet's Lane | 080/120 (Bladon) | Land should be considered for allotment space | Officers are aware of the current increase in popularity of allotments. This could be an alternative use to be investigated should there be any reason to discount the site | Investigate alternative active uses if site deemed unsuitable for residential development |

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| | | | as having development potential | |
| SHLAA methodology and specific sites | 104/005/ 013 (RPS) | Concerns relating to the Redditch SHLAA, particularly in relation to adherence to methodology and specific sites and therefore cannot be considered justified or robust:<br>1. Does not deliver against CLG Guidance Core Output 1 – there are no plans or maps to which cross-references can be made to the tables/matrices. There is no geographical context to sites for stakeholders to provide appropriate consultation response | 1. The first SHLAA draft (Oct 2008) was released for consultation in a broadly complete format with respect to methodology and indicative capacities in order to present as many Core Strategy evidence documents for consultation as possible with the intention to address any inconsistencies/ shortcomings in a revised draft as early in the new year as possible. Based | 1. None |

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| | | | on the Stage 3 Desktop review of 594 sites, only those sites considered suitable for further assessment (102) have been mapped | |
| | | 2. Does not deliver against CLG Guidance Core Output 2 – SHLAA has not completed an assessment of deliverability and developability according to the tables in Appendix 8 and is therefore incomplete | 2. This information was completed and included in the March 2009 SHLAA refresh | |
| SHLAA methodology and specific sites | 104/005/ 013 (RPS) | 3. Does not deliver against CLG Guidance Core Output 2 – Assessment requires the Council to consider availability to ensure housing delivery. The SHLAA findings are undermined as para 6.26 states that *"for some sites ownership and availability is unknown and will not be determined at this stage".* The Council should revise the SHLAA and its findings to take full account of site availability as current | 3. Para 6.26 actually states that ownership and availability information would only be collected for sites that were considered to offer some development potential as costs associated with enquiries on all sites would have been prohibitive for the Council. This information has been collected and included in the March 2009 SHLAA refresh | 2. None |

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| | | capacity considerations are not considered compliant with the requirements of PPS3 | | 3. None |
| | | 4. Does not deliver against CLG Guidance Core Output 2 – Para 6.26 states that it makes *"assumptions about landowners' attitudes to development".* The Council's ability and qualification to make such assumptions is questioned, particularly in the current economic climate where 'attitudes' are vastly different. The Council should use quantifiable evidence regarding availability. If 'landowners attitudes' are used as a proxy, then advice should be qualified and sourced appropriately rather than assumed | 4. In context, para 6.26 states that assumptions to landowners attitude towards development of sites has been made against sites that were submitted for inclusion in the SHLAA by landowners themselves. This paragraph has been further extended in the March 2009 refresh (now para 6.29) and states… *"For those sites that have been submitted for assessment by landowners, an assumption has been made about those landowners' attitudes towards development. These sites can* | |

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| | | | *be considered to be available for development as the landowners are clearly proactively considering the future development of their sites."* No assumptions were made with respect to attitudes towards development of sites that were identified through other avenues i.e. previous Urban Capacity Study. All landowners of sites which were considered to have development potential were contacted and the table at Appendix 9 updated accordingly. Two sites remain inconclusive with respect to landowners attitudes towards development and these have subsequently been pushed back in the delivery timescale until further information is obtained | 4. None |
| SHLAA methodology and specific sites | 104/005/ 013 (RPS) | 5. Does not deliver against CLG Guidance Core Output 2 – Concerned over reference in para 7.2 where the Council has combined sites which may have been promoted separately. Land ownership and assembly is far more complex an issue than can be addressed by the Council arbitrarily combining sites | 5. Officers understand concerns regarding this point, however, para 7.2 has been updated to clarify the position | |

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| | | 6. Does not deliver against CLG Guidance Core Output 2 – Para 6.27 states that achievability is assessed against market factors, cost factors and delivery factors as required by SHLAA Guidance. However SHLAA refers to none of these in its consideration of sites, it merely refers to the 'credit crunch' and draws a negative conclusion with respect to deliverability. Achievability should not be a generic assessment and should require site specific considerations to market, cost and delivery factors. Reference to the 'credit crunch' is a short term view for a plan which extends up to 2026<br>7. Does not deliver against CLG Guidance Core Output | in the March 2009 SHLAA refresh through the introduction of a statement justifying the merging of sites. Merging sites predominantly arose through the previous identification of smaller adjacent sites in the previous UCS survey to enable a more comprehensive assessment of development potential<br>6. Officers are aware of this weakness in the SHLAA and work continues to strengthen this element of the SHLAA with advice and contributions from the SHLAA Working Partnership which includes members of the development industry who have expert knowledge of economic viability and delivery of sites for housing development. In addition, the site specific considerations noted by the respondent will be developed as the Borough Council commences work on a Site | |

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| SHLAA methodology and specific sites | 104/005/ 013 (RPS) | 2 – The Council has incorrectly applied the concepts of assessing achievability as it incorrectly uses development plan phasing as a proxy. Achievability should be undertaken on a site specific basis. Phasing references should relate to specific site phasing, build rates and delivery issues not the entire phasing strategy. Phasing strategy and policy is likely to reduce achievability further by requiring brownfield sites to be favoured over others<br><br>8. Does not deliver against CLG Guidance Core Output | Allocations and Policies DPD<br><br>7. Whilst officers agree that that SHLAA guidance refers to developer's own phasing with respect to delivery factors, officers consider that for the purposes of establishing an appropriate/ approximate timeframe for development, the use of strategic phasing policy offers a broad analysis of the SHLAA sites and where they fit into the overall plan time-framework. As the SHLAA is neither policy nor strategy, the ability for sites to proceed | 5. None |

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| | | 2 – SHLAA guidance also expects sites to be considered for market viability against: The Council's aspirations for affordable housing policy to determine the levels of financial contributions likely to be sought against particular sites as this will affect viability; Council's policy/emerging policy on planning obligations or CIL; Council's policy on requiring renewable energy contributions (testing required to be in accordance with Paras 33.1 & 33.2 of PPS on Planning for Climate Change); specific issues such as land values, physical constraints, infrastructure needs and funding requirements. All of these are considered best practice elsewhere<br>9. Does not deliver against CLG Guidance Core Output | towards development at a different rate to that suggested in the SHLAA is not incomprehensible. It is anticipated that this information will be supplemented for the April 2010 SHLAA refresh through involvement of the Housing Market Partnership as part of their work on housing implementation strategy, in accordance with Housing and Planning Delivery Grant guidance and PPS3<br>8. See response to 104/005/013(RPS) 6 above | 6. April 2010 refresh of the SHLAA to include more detailed economic viability assessment of SHLAA sites as a result of the Working Partnership contributions |
| SHLAA methodology and specific sites | 104/005/ 013 (RPS) | | | |

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| | | 4 & 5 – Constraint information is limited and difficult to assess given that there are no plans or qualified evidence on assumptions made and states in para 6.28 that addressing constraints should be the responsibility of the landowner if they wish to progress their site towards development. To conform to PPS12 para 4.27, the Council has the responsibility to work proactively with landowners to establish appropriate rather than reactionary approaches to this issue | | 7. Improve delivery/ achievability assessments of sites through SHLAA Working Partnership work for 2010 SHLAA refresh |
| | | 10. RBC failed to take into consideration extensive supporting information submitted in relation to the North West Urban extension to Redditch and defers responsibility to the WYG Study which also failed to consider | 9. Constraint information has been detailed on the survey | |

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| SHLAA methodology and specific sites | | supporting information. The Council has failed to undertake timely, effective and conclusive discussion on what options for a core strategy are deliverable [PPS12 Para 4.27] | sheets in Technical Appendix A (Included sites). Constraints would not preclude a site from development, but merely highlights any issues. Para 6.26 was updated in the SHLAA refresh (March 2009, para 6.33) to reflect the Council's willingness to proactively engage with developers in order to discuss appropriate courses of action. Additional constraint information will be gathered through a landowners questionnaire as an action of the Working Partnership | |
| | 104/005/ 013 (RPS) | 11. As the SHLAA fails to deliver on 4 of the 5 Core outputs it is incomplete. It cannot be considered robust enough to inform the development strategy for the Borough. The Council places significant weight upon the SHLAA within the Core Strategy and it has been used to inform the WYG Study. This undermines the Core Strategy, WYG Study and | 10. The WYG Study considered, in broad terms, the development potential of land parcels beyond the Redditch Borough boundary and its ADRs, to determine the most suitable/sustainable direction for future growth. Additional | 8. See action at 104/005/013(RPS) 6 above |

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| | | any other element of the evidence base which is based on or uses its findings | submitted information such as that relating to the North West Urban Extension to Redditch would be more appropriately considered through Core Strategy/ Site Allocation DPD preparation rather than in the SHLAA. However, due to the RSS Panel Report Recommendations, consideration of the ADRs to accommodate Redditch's housing needs will form part of the 2010 refresh | |
| | | 12. Windfalls - The SHLAA incorrectly and unjustifiably includes a windfall allowance and should be removed from the SHLAA in its entirety | | |
| SHLAA methodology and specific sites | | 13. Windfalls – Misinterpretation of national policy on windfall allowances as RBC sought to justify inclusion of | 11. Concerns relating to the SHLAA failing to deliver on 4 out of 5 Core Outputs have been addressed in the March 2009 refresh. As the SHLAA is a living document, officers consider that its contents and forthcoming actions i.e. Housing Market Partnership work and further discussions with landowners, can only strengthen the document as it | |

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| | | windfalls on the basis of past trends (PPG3) rather than new requirements of PPS3, para 59. No reference to genuine local circumstances has been made that prevents specific sites from being identified or justification required by PPS3. The windfall allowance should be removed | and the Core Strategy process evolve | |
| | 104/005/ 013 (RPS) | 14. Cannot understand how the Council can acknowledge in the SHLAA that that there are ADRs and other sites in Appendix 8 to be assessed and then seek to claim that there are genuine local circumstances preventing sites from being identified | 12. Discussions with the SHLAA Working Partnership concluded that a windfall allowance should be excluded form the first 10 years of the Plan to ensure robustness and conformity with PPS3. This will be reflected in the April 2010 SHLAA refresh. Only brownfield historic trends will be taken into account to avoid an unrealistic expectation for greenfield development i.e. barn conversions which form part of past trends but which may already have been depleted and should rightly be excluded from future trends analysis<br>13. See 12 above | 9. Collate additional constraint information for inclusion in the 2010 refresh |

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| SHLAA methodology and specific sites | | | | 10. Consideration of the ADR capacities to form part of the 2010 refresh |
| | 104/005/ 013 (RPS) | 15. Concerns that identified supply will not come forward as expected given that site suitability, availability and achievability has not been undertaken<br>16. Evidence base fails to consider factual information regarding housing supply and delivery within the | 14. The reference in Appendix 8 to *"sites to be assessed"* refers to the initial desktop review of all sites at Stage 3 of the SHLAA process. These sites were assessed following the desktop review for their suitability for inclusion in the SHLAA. With respect to the | |

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| | | Borough in the context of the current market and housing supply. It should present sound information regarding the ability of all sites including strategic sites to deliver the required housing through a comprehensive site specific housing trajectory including start/completion rates/trends and future projections<br>17. Objection to RBC deferring responsibility of assessment of the ADRs to WYG without integrating back into the SHLAA<br>18. Detailed scrutiny of the capacity of the urban area is weak. The urban capacity is significantly challengeable against the requirements of PPS3 and | ADRs, when preparing the 2008/09 SHLAA, officers were minded to consult based on the conclusions of the WYG2 study which was commissioned to establish preferred directions of growth for Redditch. WYG1 Study concluded that whilst planning up to its boundaries only, the ADRs offered suitable locations for development. However, the WYG2 Study, when considering land beyond the Borough boundary, considered that there were other, more suitable locations for development and that the ADRs were less preferable for development than other locations. The WYG2 study was considered by the RSS Panel of Inspectors, who concluded that there were no good reasons to overturn the ADR findings in WYG1<br>15. See response to 104/005/013(RPS) 6 above | 11. None |
| SHLAA methodology | | | | |

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| and specific sites | | CLG SHLAA guidance and should be re-appraised. WYG should have included this in its detailed scrutiny of the urban area capacity | | |
| | | 19. An increase of 5dph to increase overall capacity is not considered detailed scrutiny | 16. See response to 104/005/013(RPS) 6 above | |
| | 104/005/ 013 (RPS) | | | 12. SHLAA refresh in April 2010 to recalculate windfall allowance, excluding any allowance in the first 10 years of the Plan period. |

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| SHLAA methodology and specific sites | | | 17. In the March 2009 refresh of the SHLAA, officers did integrate the WYG2 assessment of the ADRs back into the SHLAA. However, with respect to the current status of the ADRs, refer to 104/005/013(RPS) response 14 above<br><br>18. The WYG brief did not include detailed scrutiny of the urban area capacity. The Brief required that they look at the possible urban capacity on primarily open space within the urban area. Also, refer to 104/005/013(RPS) response 14 above<br><br>19. Refer to 104/005/013(RPS) | 13. See 12 above |

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| | | | response 18 above | |
| | 104/005/ 013 (RPS) | | | 14. Officers to consider capacities available within the ADRs to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period |

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| SHLAA methodology and specific sites | 104/005/ 013 (RPS) | | | |

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| | | | | 15. See action at 104/005/013(RPS) 6 above |
| | | | | 16. See action at 104/005/013(RPS) 6 above |
| SHLAA methodology and specific sites | | | | |

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| | | | | 17. See action at 104/005/013(RPS) 14 above |
| | 104/005/ 013 (RPS) | | | |
| | | | | 18. See action at 104/005/013(RPS) 14 above |

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| | | | | 19. None |

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| SHLAA methodology | 104/005/ 013 (RPS) | 20. The Council should revert back to developing and expanding upon its existing SHLAA process as part of a joint assessment undertaken with BDC which embraces an open, transparent and interactive approach to engagement. This will avoid the requirement for the Council to justify its approach for strategic land identification | 20. Further to the findings of the RSS Panel of Inspectors with respect to the WYG2 Study, officers now have clear advice in order to progress the robustness of the Redditch SHLAA | 20. RBC officers will continue to work closely with BDC to develop robust evidence to support cross-boundary growth options for Redditch related needs |

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| UCS 3.43 – Land east of Longfellow Close | 124/196 (Coulson) | Concerns about possible development of this site having an impact on the following:<br>1. Further erosion of Green Belt area<br>2. Effects on existing hedgerows, trees and wildlife<br>3. Increased flood risk<br>4. Loss of on-street car parking bay<br>5. Loss of open space with | 1. This site is not designated Green Belt<br>2. Report from the Biodiversity Officer raises concerns over loss of habitat and open feeding areas for possible bat population. In addition to this, removal of open land within Wharrage Park will put added pressure on the remainder of the Park in terms pedestrian use, thus disturbing the integrity of the whole green corridor<br>3. Site is not within Environment Agency Flood Zone. However, the site is adjacent to the Wharrage Watercourse, which is designated as Main River and as such, development would not be considered favourably by the EA.<br>4. No definitive scheme is in place for this site and the parking bay may be excluded from the development area<br>5. Headless Cross and | Officers recommend that this site be dropped from the SHLAA as landowner unwilling to release land for development. In addition, biodiversity and flooding implications along The Wharrage Park area |

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| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 126/198 (Shaw) | Concerns about possible development of this site having an impact on the following:<br><br>1. Loss of green space | This site was previously identified as a road reserve for the Alcester Highway extension, to connect to the Studley Bypass. The Bypass scheme was subsequently revoked and the land not needed for transport development. Therefore development of the site in principle has previously been established<br><br>1. Headless Cross and Oakenshaw Ward has an open space surplus of +1.92 ha per 1000 population. The overall Borough standard of unrestricted open space is 9.08Ha/1000 population. Comparison with the NPFA standard (2.4Ha/1000 population) shows that there are 8.6Ha/1000 population of formal open space, which is considered to be a healthy figure. In comparison, Redditch Borough has at least 3.1Ha/1000 population more | Officers recommend that this site remain in the SHLAA at this stage but a full 12 month species survey would need to be undertaken prior to development<br><br>1. None |

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| | | | open space than any other Worcestershire district. Furthermore, no SHLAA identifications on unrestricted open space would result in approximately 260 additional dwellings (8Ha) being allocated on Green Belt land | |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 126/198 (Shaw) | 2. Increased traffic congestion at roundabout at peak periods<br>3. Site is higher than surrounding development and new development would be very prominent on this site | 2. Comments from the Highways Engineer conclude that an increase in traffic generation from 44 units will have some impact on traffic flow at this location, it is considered unlikely however that the increase is likely to be significant enough to warrant any improvements to the island such as traffic signals. Satisfactory junction spacing can be achieved to allow access to the site, and the geometry of Grangers Lane, is suitable to allow additional traffic<br>3. The topology of this site is not sufficient to exclude it from | 2. None |

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| | | | the SHLAA. Appropriate development, sympathetic to the surroundings would be a matter to be addressed through the planning application process | 3. None |
| UCS 3.43 – Land east of Longfellow Close | 128/200 (Moore) | Concerns about possible development of this site having an impact on the following:<br>1. What is the boundary of Wharrage Brook Park? Would a green corridor be maintained if development goes ahead<br>2. History of drainage problems on the estate | 1. Wharrage Brook open space is not specifically designated as a park. BORLP3 Policy B(NE).3 seeks to protect the principle of wildlife corridors as a means of transition from one habitat to another. Development of this site would not impact on the transitional nature of such wildlife corridors. | See 124/196 above |

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| | | 3. Drainage at Wharrage Brook | 2. & 3. See 124/196 above | |
| | | 4. Would design of new development be in keeping with existing development | 4 & 8. Appropriate development, sympathetic to the surroundings would be a matter to be addressed through the planning application process | |
| | | 5. Location of vehicular access to new development | | |
| | | 6. Fate of existing footpaths | 5. See 124/196 above | |
| | | 7. Loss of green space and recreational use | 6. Indicative scheme indicates that existing footpaths would remain untouched as a consequence of development | |
| | | 8. Possible high density of development would affect the quality of life in the area | 7. Noted. Refer to response no. 124/196 | |
| | | | 8. Noted. Quality of life is a very important element of spatial planning. However, striking an appropriate and harmonious balance in Redditch is currently hampered | |

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| UCS 3.43 – Land east of Longfellow Close | 128/200 (Moore) | 9. Increase in waste<br>10. Increase in noise levels<br>11. Block views and impact on property values | by the fact that the available land identified in the SHLAA to meet the Regional Housing Allocation for the Borough falls short of this allocation<br>9 & 10. Increase in waste and noise from a maximum of 7 dwellings is not considered to have a significant impact<br>11. Impact on property values and outlook for existing properties is not considered to be a spatial planning matter. | |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 131/204 (Troth) | Objection to development of this site with respect to: | This site was previously identified as a road reserve for the Alcester Highway extension, to connect to the Studley Bypass. The Bypass scheme was subsequently revoked and the land not needed for transport development. Therefore development of the site in principle has previously been established | See action at 126/198 above |
| UCS 8.10 – Land at McDonalds | | 1. Impact on wildlife (bats, deer, butterflies, dragonflies, buzzards, | 1. Report by Biodiversity | |

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| Island, Oakenshaw | 131/204 (Troth) | pheasants)<br>2. Grangers Lane already dangerous due to volume/speed of existing car users | Officer is unclear as to the presence of protected species<br>2. Comments from the Highways Engineer conclude that the issue of speeding traffic is an existing situation that is unlikely to be made worse by development at this location, in any event, it will be a matter for the police to enforce and is likely to be caused by local traffic | 1. Request full 12 month species survey for this site<br>2. None |
| WYG03 – Tanhouse Lane | 135/218 (Smith) | Objects to development on this site. The trees and shrubs compensate for the housing estate | 1. Brownfield site, which has been cleared for future development. Trees and shrubs have been cleared from the site with the exception of perimeter planting. Noted that Church Hill Ward has an open space deficit of -2.47 ha per 1000 population. The overall Borough standard of unrestricted open space is 9.08Ha/1000 population. Comparison with the NPFA standard (2.4Ha/1000 population) shows that there | None |

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| WYG03 – Tanhouse Lane | 135/218 (Smith) | | are 8.6Ha/1000 population of formal open space, which is considered to be a healthy figure. In comparison, Redditch Borough has at least 3.1Ha/1000 population more open space than any other Worcestershire district. Furthermore, no SHLAA identifications on unrestricted open space would result in approximately 260 additional dwellings (8Ha) being allocated on Green Belt land | |
| UCS 3.43 – Land east of Longfellow Close | 136/219 (Wood) | Objects to development of this site with respect to:<br>1. Increased traffic flow through Longfellow Close<br>2. Loss of open space and would cut off open aspect of the Close | 1. See 124/196 above<br>2. Noted. Refer to response no. 124/196 | See 124/196 above |
| UCS 3.43 – Land east of Longfellow | 137/220 (Batchelor) | Objects to development of this site with respect to: | | See 124/196 above |

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| Close | | 1. Loss of open space/ recreation land<br>2. Affect on existing hedgerows, flora and fauna<br>3. Increased traffic flow through Close<br>4. Concerns of footpath closure | 1. See 124/196 above<br>2. See 124/196 above<br>3. See 124/196 above<br>4. Indicative scheme indicates that existing footpaths would remain untouched as a consequence of development | |
| UCS 2.16 – Land to the rear of Sandygate Close | 138/221 (Lawless) | Objects to development of this site with respect to:<br>1. Loss of residents privacy<br>2. Lack of parking facilities<br>3. Loss of safe play space | 1. Noted. Unsure how privacy will be lost<br>2. New development would need to meet required parking standards and no existing parking provision would be lost. This would be a consideration at any planning application stage | Officers recommend that this site remain in the SHLAA at this stage |

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| UCS 2.16 – Land to the rear of Sandygate | 138/221 | 4. Implications associated with building sites - movement of construction traffic through congested residential area, health & safety of residents and visitors, dirt and grime | 3. West Ward has an open space surplus of +4.81 ha per 1000 population. The overall Borough standard of unrestricted open space is 9.08Ha/1000 population. Comparison with the NPFA standard (2.4Ha/1000 population) shows that there are 8.6Ha/1000 population of formal open space, which is considered to be a healthy figure. In comparison, Redditch Borough has at least 3.1Ha/1000 population more open space than any other Worcestershire district. Furthermore, no SHLAA identifications on unrestricted open space would result in approximately 260 additional dwellings (8Ha) being allocated on Green Belt land<br>4. Disruption from construction is a temporary issue. All safety regulations and planning conditions to ensure street cleanliness etc would be met | |

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| Close | (Lawless) | | during construction | |
| UCS 3.43 – Land east of Longfellow Close | 139/222 (Pioli) | Objects to development of this site with respect to:<br>1. Loss of open space<br>2. Safe area for children to play<br>3. Existing high levels of traffic in the Close | 1 & 2. Noted. Refer to response no. 124/196<br>3. See 124/196 above | See 124/196 above |
| UCS 3.43 – Land east of Longfellow Close | 140/223 (Brewer) | Objects to development of this site with respect to:<br>1. Access into Longfellow Close inadequate due to existing on-street parking<br>2. Loss of on-street car parking bay<br>3. Loss of safe area for children to play<br>4. Concerns of footpath closure | 1. See 124/196 above<br>2. No definitive scheme is in place for this site and the parking bay may be excluded<br>3. Noted. Refer to response no. 124/196<br>4. Indicative scheme indicates that existing footpaths would remain untouched as a | See 124/196 above |
| UCS 3.43 – Land east of Longfellow | 140/223 | | | |

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| Close | (Brewer) | | consequence of development | |
| | | 5. Disruption to wildlife e.g. bats in nearby oak trees | 5. See 124/196 above | |
| | | 6. History of drainage problems near 27 Longfellow Close | 6. See 124/196 above | |
| | | 7. Increased flood risk | 7. See 124/196 above | |
| UCS 3.43 – Land east of Longfellow Close | 141/224 (Eacock) | Objects to development of this site with respect to: | | See 124/196 above |
| | | 1. Loss of Green Belt land | 1. Not Green Belt land – primarily open space. Refer to response no. 124/196 | |
| | | 2. Loss of public right of way | 2. Indicative scheme indicates that existing footpaths would remain untouched as a consequence of development | |
| | | 3. Loss of safe area for children to play | 3. Noted – see 1 above | |
| | | 4. History of drainage problems near 27-29 Longfellow Close | 4. See 124/196 above | |
| | | 5. Disruption and danger from | | |

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| | | construction traffic | 5. Disruption from construction is a temporary issue. All safety regulations and planning conditions to ensure street cleanliness etc would be met during construction | |
| UCS 3.43 – Land east of Longfellow Close | 141/224 (Eacock) | 6. Wharrage Brook Park is home to variety of flora and fauna. Affect on existing TPO oak trees, flora and fauna (sparrows, bats, bluebells) | 6. See 124/196 above | |
| | | 7. When estate first built, this land was identified for landscaping but was not completed as builders went into liquidation | 7. The site did not form part of the original site for the estate development and there are no plans to indicate that it was to be landscaped by developers (File No. NT23 82) | |
| | | 8. Density concerns | 8. Noted | |
| UCS 3.43 – Land east of Longfellow Close | 142/225 (Purshall) | Concerns about possible development of this site having an impact on the following:<br>1. Loss of safe play space for children will fuel obesity | | See 124/196 above |

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| | | epidemic | 1. Noted. Refer to response no. 124/196. | |
| | | 2. Increased traffic flow through Close and parking on pavements makes route unsafe for pedestrians<br>3. Increased flood risk to existing properties<br>4. Loss of vegetation e.g. hedgerows | Redditch Health Profile 2008 (Department of Health, www.healthprofiles.info) shows that the percentage of physically active children in the Borough is significantly better than the England average (10% lower). The percentage of obese children in the Borough is not significantly different to the England average but is 0.2% lower<br>2. See 124/196 above<br>3. See 124/196 above<br>4. Existing hedgerows will remain untouched. One small | |
| UCS 3.43 – Land east of Longfellow Close | 142/225 (Purshall) | | | |

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| | | | tree may be affected | |
| UCS 3.43 – Land east of Longfellow Close | 143/226 (Marshall) | Objects to development of this site with respect to:<br>1. Loss of vital 'breathing space' between Housing estates<br>2. Loss of recreation space and safe play space for children<br>3. Loss of wildlife habitat<br>4. Plenty of brownfield sites elsewhere in Redditch that could be used for housing | 1 & 2. Noted. Refer to response no. 124/196<br>3. See 124/196 above<br>4. 56% of sites identified in the SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process | See 124/196 above |
| UCS 3.43 – Land east of Longfellow Close<br><br>UCS 3.43 – Land east of Longfellow | 144/227 (White) | Objects to development of this site with respect to:<br>1. Increased traffic flow through Close<br>2. Increased congestion due to existing on-street parking<br>3. Loss of on-street car | 1 & 2. See 124/196 above | See 124/196 above |

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| Close | 144/227 (White) | parking bay/ turning area<br><br>4. Existing school-run traffic parks opposite Longfellow Close and cars use Close entrance to turn around which is chaotic<br><br>5. Loss of recreation space and safe play space for children | 3. No definitive scheme is in place for this site and the parking bay may be excluded<br><br>4. Noted but not a spatial planning matter<br><br>5. Noted. Refer to response no. 124/196 | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 145/228 (Gooding) | Objects to development of this site with respect to:<br><br>1. Loss of recreation space and safe play space for children | 1. Noted that Lodge Park Ward has an open space deficit of -2.72 ha per 1000 population. The overall Borough standard of unrestricted open space is 9.08Ha/1000 population. Comparison with the NPFA standard (2.4Ha/1000 population) shows that there are 8.6Ha/1000 population of formal open space, which is considered to be a healthy figure. In comparison, Redditch | Officers recommend that this site be dropped from the SHLAA as landowner unwilling to release land for development. In addition, biodiversity implications and lack of open space provision in the Lodge Park Ward warrant exclusion. |

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| | | | Borough has at least 3.1Ha/1000 population more open space than any other Worcestershire district. Furthermore, no SHLAA identifications on unrestricted open space would result in approximately 260 additional dwellings (8Ha) being allocated on Green Belt land. Only half of the site has been identified as having development potential | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 145/228 (Gooding) | | | |
| UCS 3.43 – Land east of Longfellow Close | 146/229 (Hill & Dunn) | Objects to development of this site with respect to:<br>1. Increased traffic flow through Close<br>2. Increased congestion due to existing on-street parking | 1 & 2. See 124/196 above | See 124/196 above |

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| | | 3. Loss of on-street car parking bay/ turning area<br><br>4. Existing school-run traffic parks opposite Longfellow Close and cars use Close entrance to turn around which is chaotic<br><br>5. Loss of recreation space and safe play space for children | 3. No definitive scheme is in place for this site and the parking bay may be excluded<br><br>4. Noted but not a spatial planning matter<br><br>5. Noted. Refer to response no. 124/196 | |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw<br><br>UCS 8.10 – Land at McDonalds Island, Oakenshaw | 154/266 (Ashfield)<br><br>154/266 (Ashfield) | Concerns about possible development of this site having an impact on the following:<br><br>1. Destroy wildlife habitat, | This site was previously identified as a road reserve for the Alcester Highway extension, to connect to the Studley Bypass. The Bypass scheme was subsequently revoked and the land not needed for transport development. Therefore development of the site in principle has previously been | See action at 126/198 above |

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| | | trees and bushes | established | |
| | | 2. Increased traffic congestion at roundabout | 1. See 131/204 above | 1. See 131/204 above |
| | | 3. Increased pollution from higher traffic volume | 2 & 3. See 126/198 above | 2. & 3. See 126/198 above |
| | | 4. Lineholt Close protected by trees which form noise buffer from roads | | |
| | | 5. Development would impact on property values and destroy outlook for Lineholt Close | 4. Trees alongside Lineholt Close will not be removed | 4. None |
| | | | 5. Impact on property values and outlook for existing properties is not considered to be a spatial planning matter | 5. None |

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| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 155/267 (Burgoyne) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 156/268 (Mitchell) | Objects to development of this site with respect to:<br>1. Presence of bats | 1. Comments from the Biodiversity officer conclude that it has been reported that bats are regularly seen over the field in the evenings. Thus the field acts as an important feeding area for bats. The bats might be present within the older trees on the site and also within the roof spaces of some of the houses surrounding the field. Some residents have bat boxes in gardens which are being used. Development on feeding areas such as this field will cause problems for all bat species.<br><br>The presence of owls has been | See action at 145/228 above |

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| | | | reported. If present, they will also be hunting over the field and adjacent gardens for small mammals.<br><br>Reports of amphibians such as frogs, toads and newts present in gardens and within the site. Possible presence of great crested newts in some ponds. | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 156/268 (Mitchell) | 2. Loss of recreation space for children | Surveys for bats and great crested newts would have to be carried out over a full year period to ascertain which of these species are present on the site.<br><br>2. Noted. Refer to response no. 145/228 | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere | 157/269 (Gardner) | Objects to development of this site with respect to:<br><br>1. Increased traffic volume along Watery Lane and Ravensmere Road | 1. Comments from the Highways Engineer conclude that due to the lack of a footpath on Watery Lane, the road appears narrow and restricted to road users, even | See action at 145/228 above |

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| Road | | | though it is of adequate width to accommodate an additional number of units. The main issue however, is that properties currently fronting the lane directly abut the carriageway without the 'buffer' of a footpath; this makes egress, especially on foot, hazardous. This hazard would increase with additional development. In order to alleviate this situation, a footpath would need to be constructed on the south side of Watery Lane and the carriageway widened on the north side to maintain a width of 5.5m | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 157/269 (Gardner) | 2. Overworked drains would be more prone to flooding | 2. Comments from the Assets Maintenance Officer conclude that The surface water will require balancing to green-field run-off, prior to discharge to a public sewer. There is a public surface water sewer situated within the site, near its southern boundary. | |

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| | | | It's possible that this may dictate layout or require diversion, if feasible | |
| | | 3. Loss of outstanding views from respondents property resulting in property devaluation and reduced quality of life | 3. Impact on property values and outlook for existing properties is not considered to be a spatial planning matter. Quality of life is a very important element of spatial planning. However, striking an appropriate and harmonious balance in Redditch is currently hampered by the fact that the available land identified in the SHLAA to meet the Regional Housing Allocation for the Borough falls short of this allocation | |
| | | 4. Possibility of loss of rear access to respondents property | 4. Site is at the opposite end of the field to respondents property so no loss of rear access is likely | |
| | | 5. Loss of recreation space | 5. Noted. Refer to response no. 145/228 | |
| | | 6. There are many more | 6. The search for available and deliverable sites has been | |

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| | | alternative sites on which to build | exhausted through this process | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 157/269 (Gardner) | | | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 161/280 (Donegan) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children<br>2. Waste of taxpayers money to install play equipment/ planting if is to be lost to development | 1. Noted. Refer to response no. 145/228<br>2. Only half of the site has been identified as having development potential and excludes the play area | See action at 145/228 |
| General loss of open space for residential development & | 162/281 (Arney) | 1. Retention of open countryside/ Green Belt south of Elmstone Close | 1. Noted. However there are no development proposals which affect the Green Belt south of Elmstone Close. Green Belt to the south west of the urban area was excluded due to Green Belt sensitivities | Officers recommend that this site be dropped from the SHLAA as landowner unwilling to release land for development. In addition, there are biodiversity and |

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| UCS 3.23 – Land off Hunt End Lane<br><br>General loss of open space for residential development &<br><br>UCS 3.23 – Land off Hunt End Lane | 162/281 (Arney) | 2. Objection to development of UCS 3.23 as it forms a buffer between residential and employment uses<br><br>3. Site contains hazardous waste | highlighted in the Study of Green Belt Land & ADRs within Redditch<br><br>2. A buffer will be retained between incompatible uses if this site comes forward for development<br><br>3. Comments from the Environmental Health Officer conclude that the proposed residential development is a sensitive land use and a contaminated land assessment would be required what ever the former land use. The area is situated close to a former factory which has had a variable site history (manufactured cars/vehicles, batteries and tyre storage/ manufacture). The current site uses on the industrial estate can also lead to on this site contamination. On the actual proposed site a tank is depicted what this is unclear. It is likely to be water but could | contamination issues |

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| | | | also be fuel.<br><br>Our current records do not indicate that the site was subject to a potentially contaminative land use with the exception of the tank. At other battery works in Redditch, contamination has been encountered some distance from the site; further assessment of the proposed site should therefore be undertaken. In order to understand the likely costs of remediating the site a Phase 1 and potentially a Phase 2 investigation is recommended. | |
| | | 4. Loss of well used amenity open space | | |
| General loss of open space for residential development &<br><br>UCS 3.23 – Land off Hunt | 162/281 | | 4. Noted that Astwood Bank & Feckenham Ward has an open space surplus of +4.02 ha per 1000 population. The overall Borough standard of unrestricted open space is 9.08Ha/1000 population. Comparison with the NPFA standard (2.4Ha/1000 | |

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| End Lane | (Arney) | | population) shows that there are 8.6Ha/1000 population of formal open space, which is considered to be a healthy figure. In comparison, Redditch Borough has at least 3.1Ha/1000 population more open space than any other Worcestershire district. Furthermore, no SHLAA identifications on unrestricted open space would result in approximately 260 additional dwellings (8Ha) being allocated on Green Belt land | |

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| General loss of open space for residential development &<br>UCS 3.23 – Land off Hunt End Lane | 162/281 (Arney) | | | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 163/282 (Boor) | Objects to development of this site with respect to:<br>1. Council assurance in 2004 that area would remain for recreational facilities | 1. Comments from Leisure Services conclude that during the public consultations regarding the new play area facility Members did give assurance at the NHG that this piece of open space would | See action at 145/228 above |

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| | | | remain in situ | |
| | | 2. Loss of recreation space and safe play space for children | 2. Noted. Refer to 145/228 above | |
| | | 3. Capacity of Watery Lane to accommodate additional traffic | 3. Noted. Refer to 157/269 above | |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 164/283 (Mews & Wakefield) | Objection to development of this site with respect to: | This site was previously identified as a road reserve for the Alcester Highway extension, to connect to the Studley Bypass. The Bypass scheme was subsequently revoked and the land not needed for transport development. Therefore development of the site in principle has previously been established | See action at 126/198 above |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 164/283 (Mews & Wakefield) | 1. Increased traffic volume at roundabout | 1. See 126/198 above | 1. See 126/198 above |
| | | 2. Land provides a noise barrier between respondents house and the busy roundabout | 2. Land mass would not be flattened - no reason why | 2. None |

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| | | | development on this site should reduce current noise barrier from roundabout traffic | |
| | | 3. Impact on wildlife (bats, deer, foxes) | 3. See 131/204 above | 3. See 131/204 above |
| | | 4. Loss of open space for recreational uses such as dog walking would be limited if land developed | 4. Noted. Refer to response no. 126/198 | 4. See 126/198 above |
| | | 5. Loss of visual amenity whilst driving around the roundabout | 5. Noted. Not considered a spatial planning issue | 5. None |
| | | 6. Development in a desirable location would negatively affect property prices | 6. Noted. Not considered a spatial planning issue | 6. None |
| | | 7. Development of terraced and semi detached properties would be out of keeping with Oakenshaw South | 7. Development would be designed to accommodate existing topography and would be of a size and type reflective of the identified Redditch housing requirements detailed in the Redditch Strategic Housing Market Assessment | 7. None |
| | | 8. Negative affect on the area due to social housing and | | |

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| | | their associated 'trouble' | 8. Redditch Borough's target for affordable housing is 141 units to be delivered per annum, as minima. National Planning Policy (PPS3) requires all development of 15 dwellings or more to accommodate a percentage of affordable housing units. Guidelines for Redditch are set out in the SPD on Affordable Housing (January 2008) | 8. None |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 164/283 (Mews & Wakefield) | | | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 165/284 (Forester) | Objects to development of this site with respect to:<br>1. Loss of only recreation space in the Greenlands, Woodrow, Lodge Park and Smallwood areas<br>2. Loss of valuable and well used and safe play space | 1 and 2. Noted. Refer to response no. 145/228 | See action at 145/228 above |

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| | | for children | | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 166/285 (Cater) | Objects to development of this site with respect to:<br>1. Loss of play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 167/286 (Headley) | Objects to development of this site with respect to:<br>1. Detrimental effect on house prices in Hoveton Close<br>2. Spoil outlook of properties in Hoveton Close<br>3. Loss of play space for children. Problem in Hoveton Close of children playing ball games in the street. This has been addressed with community police support to encourage children to use the open | 1. Noted but not a spatial planning matter<br>2. Noted but not a spatial planning matter<br>3. Noted. Refer to response no. 145/228 | See action at 145/228 above |

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| | | space. | | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 168/287 (Davies) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children<br>2. Waste of council tax payers money to install play equipment/ planting if is to be lost to development | 1. Noted. Refer to response no. 145/228<br>2. Only half of the site has been identified as having development potential and excludes the play area | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 169/288 (Dixon) | Objects to development of this site with respect to:<br>1. Loss of play space for children<br>2. Green areas should stay green | 1. Noted. Refer to response no. 145/228<br>2. 56% of sites identified in the SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of greenfield land has had to be considered to meet the Borough's housing allocation | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane | 170/289 (Street) | Objects to development of this site with respect to:<br>1. Recreational ground | 1. Noted. To date no title deed information has been forthcoming to verify this claim | See action at 145/228 above |

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| & Ravensmere Road | | donated by builder of Watery Lane homes and protected by King George VI covenant<br>2. Loss of play space for children<br>3. Watery Lane inadequate to accommodate increased volume of traffic<br>4. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>5. Inadequate drainage and flooding concerns along Watery Lane | 2. Noted. Refer to response no. 145/228<br>3. & 4. See 157/269 above<br>5. See 157/269 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere | 171/290 (Horton) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |

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| Road | | | | |
| UCS 3.43 – Land east of Longfellow Close | 172/291 (George) | Objects to development of this site with respect to:<br>1. Safety of footpath use if site developed<br>2. Flooding issues downstream of The Wharrage if site developed | 1. Footpath falls beyond site boundary and should not be affected by development<br>2. See response 124/196 above | See 124/196 above |
| UCS 3.23 – Land off Hunt End Lane | 173/292 (Backhurst) | Objects to development of this site with respect to:<br>1. Loss of open space<br>2. Tree Preservation Order on site<br>3. Impact of wildlife | 1. Noted. Refer to response no. 162/281<br>2. Noted. Development would need to comply with the TPO restrictions for New Town TPO 29<br>3. Comments from the Biodiversity Officer conclude that this area of land contains a range of habitats, including scrubland, meadowland, rough grassland, developing native | See action at 162/281 above |

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| | | | woodland plantations, mature trees, veteran trees and some lengths of hedgerow. It is this important mosaic of habitats that make this site good for wildlife as it leads to a great range of plants and animals being found within it. It is likely that bat species will be present on the site and using the grassland and scrubland areas to feed over. It is also likely that the site will be important for amphibians and reptiles, in particular, grass snakes, great crested newts and slow worms. There are areas of thick scrub of hawthorn and blackthorn. Foxes and deer are present within the scrubland area. There is also a distinct possibility of badgers present on the site.<br><br>An extensive ecological survey carried out over a full year would be needed to check for all protected species within the | |
| UCS 3.23 – Land off Hunt End Lane | 173/292 (Backhurst) | | | |

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| | | | site.<br><br>The whole site consists of a developing woodland plantation strip of mixed native species such as Oak and Field Maple at around 30 years of age. Within this plantation are several mature trees and some large veteran trees. Eastwards from this plantation strip occurs more open land. To the south this is developing scrubland with open areas of wildflowers and rough grassland. To the north of this scrubland is an area of meadow land. These two habitats are very important for wildlife. They are particularly good for insects, birds and small mammals. For the past three years, the Redditch Mid-Week Conservation Volunteer Group (Run by RBC) has been carrying out a series of tasks on the Hunt End Lane Open | |

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| UCS 3.23 – Land off Hunt End Lane | 173/292 (Backhurst) | 4. Loss of buffer between incompatible land uses<br>5. Loss of public footpath<br>6. Disruption to public access during construction<br>7. Steep, undulating land may be cost prohibitive to develop<br>8. View of Dunlop Road | Space area, helping to keep paths through the site open and also to manage the meadow area.<br>The possible construction of housing across this site would thus harm the site greatly with the loss predominantly of two of the most important habitats, the scrubland and the meadow land. It also reduces the mosaic effect of having several interesting habitats adjacent to each other, which is so important for wildlife here. Leaving isolated fragments of these habitats around the edge of the housing is not a good enough wildlife mitigation measure here<br>4. A buffer will be retained between incompatible uses if this site comes forward for development<br>5. Public footpath/ access | |

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| | | industrial estate from new properties may effect ability to sell properties<br>9. Traffic noise from Windmill Drive<br>10. Disruption, noise and traffic during construction period would impact on local property prices during this period<br>11. Type of properties (4 bed detached) could impact on existing properties if not in-keeping with existing residential development<br>12. Loss of visual amenity along Hunt End Lane<br>13. Impact of additional traffic at junction of Hunt End Lane/ Windmill Drive | would be maintained<br>6. Noted. Suggest that arrangements are put in place during construction to keep public right of way open<br>7. Noted. However, Redditch is renowned for building on steep, undulating land due to its general topography<br>8. Noted but not a spatial planning matter<br>9. Existing vegetation would continue to act as a sound buffer to residential development<br>10. Disruption from construction is a temporary issue | |
| UCS 3.23 – Land off Hunt End Lane | 173/292 (Backhurst) | | | |

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| | | | 11. Development would be of a size and type reflective of the identified Redditch housing requirements detailed in the Redditch Strategic Housing Market Assessment<br><br>12. Noted but not a spatial planning matter. Indicative scheme indicates that development would be well screened<br><br>13. Comments from the Highways Engineer conclude that Hunt End Lane and the junction with Windmill Drive are considered suitable to accommodate the proposed increase in traffic without the need for improvement | |

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| UCS 3.23 – Land off Hunt End Lane | | | | |
| | 173/292 (Backhurst) | | | |
| UCS 3.43 – Land east of Longfellow Close | 174/293 (McAuliffe) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children<br>2. Loss of outlook for existing properties<br>3. Loss of quality of life of existing residents and 'Park' users | 1. Noted. Refer to response no. 124/196<br>2. Noted but not a spatial planning matter<br>3. Noted. Quality of life is a very important element of spatial planning. However, striking an appropriate and | See 124/196 above |

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| | | | harmonious balance in Redditch is currently hampered by the fact that the available land identified in the SHLAA to meet the Regional Housing Allocation for the Borough falls short of this allocation | |
| | | 4. There are more suitable areas for development | 4. 56% of sites identified in the SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of greenfield land has had to be considered to meet the Borough's housing allocation | |
| | | 5. Increased traffic flow through Close | 5 & 6. See 124/196 above | |
| | | 6. Increased congestion due to existing on-street parking | | |
| | | 7. Loss of on-street car parking bay/ turning area | 7. No definitive scheme is in place for this site and the parking bay may be excluded | |
| | | 8. Suggestion of alternative area of 'Wharrage Park' be | 8. The remaining land within | |

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| | | considered as an alternative to this site | 'Wharrage Park' is not considered suitable for development due to its linear nature and access difficulties | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 175/294 (Rao) | Objects to development of this site with respect to:<br>1. Lack of formal notification of proposal to all local residents | 1. The SHLAA forms part of the evidence base to support the Core Strategy. The Core Strategy and its supporting evidence documents were available for public consultation between 31 October 2008 and 8 May 2009. This consultation period was publicised in the local press, at neighbourhood groups, on the Council's web site, in Redditch Matters, in a cinema advert and at a number of drop-in sessions at various locations around the town. Formal notification of the production of a background document to the Core Strategy is not a recognised requirement but the Council considers that more than | See action at 145/228 above |

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| | | | sufficient notification/ consultation has been undertaken | |
| | | 2. Has Ramblers Association been notified? | 2. Ramblers Association is included on our consultation database and was notified of this consultation period. No response from the Ramblers Association was received | |
| | | 3. Loss of recreational open space | 3 , 4 & 6. Noted. Refer to response no. 145/228 | |
| | | 4. Loss of safe play space for children | | |
| | | 5. Removal of Open Space is contrary to Local Plan No.3 | 5. 56% of sites identified in the SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of greenfield land has had to be considered to meet the Borough's housing allocation. Policy R.1 of Local Plan No.3 states that development will be considered on Primarily Open | |
| | | 6. Greenlands Ward has a poor open space provision | | |

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| | | | Space if it can be demonstrated that the need for development outweighs the value of the land as an open area | |
| | | 7. Loss of public footpaths | 7. Public Rights of Way would be retained | |
| | | 8. Increased risk of surface water flooding as there is nowhere for excess water to drain to | 8. Drainage would form part of any development proposals | |
| | | 9. Site of old aluminium factory has not been identified for housing | 9. The Council has a need to safeguard existing employment land for employment uses | |
| | | 10. Development would discourage presence of bats | 10 & 11. See 156/268 above | |
| | | 11. Development would discourage presence of owls who use field for hunting mice | | |
| UCS 5.20 – Land off Lady Harriet's Lane | 176/295 (Mills) | Objects to development of this site with respect to:<br>1. Detrimental effect on respondents property | 1. Noted. Not considered a spatial planning issue | Officers recommend that this site be dropped from the SHLAA as landowner unwilling to release land for development as the site is in |

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| | | 2. Concerns over passing space for vehicles travelling the length of the lane<br>3. Maintenance of unadopted land with increased traffic<br>4. Lack of privacy<br>5. Consideration of covenants relating to lane | 2 & 3. Comments from the Highways Engineer conclude that Lady Harriet's Lane is considered to be of sufficient width to accommodate a small increase in traffic generation of up to 7 units. The visibility at the junction of Easemore Road is also considered suitable due to the new guidelines outlined in Manual for Streets. It will be necessary to improve the lane in line with adoptable construction standards and a dedicated footpath will be necessary, given the current designation as a public right of way. It is considered that this could be accommodated, together with a suitable carriageway within the current confines of the Lane<br>4. Noted. Not considered a spatial planning issue<br>5. Noted. Extent of ownership boundaries confirmed with Legal team. | use by Trinity High School |

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| | | 6. Access for maintaining leylandii border tree line<br>7. Light pollution from all weather sports pitch effecting proposed development | 6. Unaware why existing maintenance access should be affected<br>7. Existing boundary planting should offer screening | |
| UCS 3.43 – Land east of Longfellow Close | 177/296 (Cooke) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children | 1. Noted. Refer to response no. 124/196 | See 124/196 above |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 178/297 (Lewis) | Objection to development of this site with respect to:<br>1. Increased traffic volume at roundabout<br>2. Concerns over location of residential access road for this site in relation to bend of Grangers Lane as car speed is an issue | This site was previously identified as a road reserve for the Alcester Highway extension, to connect to the Studley Bypass. The Bypass scheme was subsequently revoked and the land not needed for transport development. Therefore development of the site in principle has previously been established | See action at 126/198 above |

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| | | | 1 & 2. See 126/198 and 131/204 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 179/298 (Harris) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| RB003 - Widney House & adjoining land, Bromsgrove Road | 180/300 (Parry) | Objects to development of this site with respect to:<br>1. Open space forms important green wedge between large-scale residential areas | 1. Noted that Central Ward has an open space surplus of +6.35 ha per 1000 population. The overall Borough standard of unrestricted open space is 9.08Ha/1000 population. Comparison with the NPFA standard (2.4Ha/1000 population) shows that there are 8.6Ha/1000 population of formal open space, which is considered to be a healthy figure. In comparison, Redditch Borough has at least 3.1Ha/1000 population more open space than any other Worcestershire district. Furthermore, no SHLAA | None |

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| | | | identifications on unrestricted open space would result in approximately 260 additional dwellings (8Ha) being allocated on Green Belt land | |
| RB003 - Widney House & adjoining land, Bromsgrove Road | 180/300 (Parry) | 2. Open space forms part of the current play and sports provision in the area (junior football) | 2. Comments from Leisure Services conclude that the junior football pitch is in the ownership of Worcestershire County Council, it does not form part of the current playing pitch provision and RBC can accommodate all playing pitch requirements within existing formal playing field provision. It is used by Redditch United informally, however, this has no implications for the development of this site | |
| | | 3. Demolition of properties on Bromsgrove Road would be detrimental to the character and layout of the residential area | 3. Noted. However, development of this nature has been carried out in other parts of Redditch, therefore precedent already set but would be a matter at planning application stage | |
| | | 4. New access road may create additional road | 4. Comments from the | |

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| | | safety issues | Highway Engineer conclude that whilst there is unlikely to be a major issue introducing an additional volume of traffic onto Bromsgrove Road, the volume indicated would require a Transport Assessment to accompany any Planning Application, to identify any potential problem areas in the vicinity of the site, together with any improvements to public transport facilities and the walking/cycling network. | |
| RB003 - Widney House & adjoining land, | | | The existing access is considered unsuitable in its current form to serve the maximum number of dwellings; approximately 50 units are considered to be the maximum from this access point.<br><br>Subject to any additional access meeting the relevant design criteria, there would be no objection to this provision to | |

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| Bromsgrove Road | 180/300 (Parry) | | further serve the site | |
| Webheath ADR – Woodyard Garage site | 181/301A (Lloyd) | Site considered suitable for inclusion in the SHLAA for the following reasons:<br>1. Brownfield site in the Green Belt<br>2. Non-conforming industrial use in an existing residential area<br>3. Assist the development of the ADR | See 104/005/013 (RPS) 14 above | See action at 104/005/013 (RPS) 14 above |
| UCS 3.43 – Land east of Longfellow Close | 182/304 (Morris) | Objects to development of this site with respect to:<br>1. Loss of safe path provided for school children | 1. The path will not be affected by the development of this site | See 124/196 above |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 183/305 (Cund) | Objects to development of this site with respect to: | This site was previously identified as a road reserve for the Alcester Highway extension, to connect to the Studley Bypass. The Bypass | See action at 126/198 above |

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| | | | scheme was subsequently revoked and the land not needed for transport development. Therefore development of the site in principle has previously been established | |
| | | 1. Pedestrian safety at crossing point adjacent to indicative road access | 1. Response from the Highways Engineer concluded that there is a reasonable crossing point provided already and additional pedestrian movements would be sufficient to require an upgraded crossing in this location. Furthermore, there would not be a major issue leaving it in it's current position, even with a new residential access | 1. None |
| | | 2. Increased pollution from higher traffic volume | 2 & 7. It is considered that traffic congestion will only increase at am & pm peak times as people leave/return a residential area. As such, congestion and pollution is not currently considered to have a significant impact | |
| UCS 8.10 – Land at McDonalds Island, | | 3. Lineholt Close footpath protected by trees which form noise buffer from | | |

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| Oakenshaw | 183/305 (Cund) | roads<br>4. Impact on wildlife<br>5. Loss of open space<br>6. Increased impact on drainage at Grangers Lane/ roundabout junction which occasionally floods<br>7. Increased impact from air pollution<br>8. Impact of social housing | 3. Trees alongside Lineholt Close footpath will not be removed<br>4. See 131/204 above<br>5. Noted. Refer to response no. 126/198<br>6. Report by the Operations Manager (Assets Maintenance) concludes that he is unaware of any flooding issues in the vicinity although there is possibly a susceptibility to surface water flooding, possibly due to inadequate or poorly maintained highway drainage – this is not a valid reason to exclude the site from the SHLAA<br>8. National Planning Policy (PPS3) requires all development of 15 dwellings or more to accommodate a percentage of affordable housing units. Requirements in | 2 & 7. None<br>3. None<br>4. See 131/204 above<br>5. See 126/198 above<br>6. None |

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| | | | Redditch are set out in the SPD on Affordable Housing (January 2008) | |
| | | | | 8. None |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 184/306 (Wilkes) | Objects to development of this site with respect to:<br>1. There has been enough development in this area over the last 10 years<br>2. Loss of recreation space for children | 1. Noted. Redditch has a perpetual requirement to provide housing and employment to accommodate its evolving population and workforce<br>2. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane | 186/308 (Hallahan) | Objects to development of this site with respect to:<br>1. Loss of recreation space for | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |

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| & Ravensmere Road | | children<br>2. Increased traffic congestion in the Studley Road vicinity<br>3. No prior knowledge of consultation period | 2. Comments from the Highways Engineer conclude that the Studley Road junction is capable of accommodating additional traffic, however, it may be necessary to carry out some re-configuration to the service road fronting Studley Road, in order to prevent conflict. There are no further reaching issues on traffic generation in the area.<br>3. The SHLAA forms part of the evidence base to support the Core Strategy. The Core Strategy and its supporting evidence documents were available for public consultation between 31 October 2008 and 8 May 2009. This consultation period was publicised in the local press, at neighbourhood groups, on the Council's web site, in Redditch Matters, in a cinema advert and at a number of drop-in sessions at various | |

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| | | | locations around the town | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 187/309 (Zagwoski) | Objects to development of this site with respect to:<br>1. Loss of recreation space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 188/310 (Reed) | Objects to development of this site with respect to:<br>1. SHLAA identifies a range of 13-22 dwellings | 1. The SHLAA identifies a capacity ranging from 30 to 50 dwellings per hectare. However, guidance suggest that indicative schemes can give a more realistic capacity figure, hence 16 dwellings based on the indicative scheme, has been used in the final analysis of land with development potential | See action at 145/228 above |
| | | 2. Loss of Primarily Open Space. RBC as landowner may determine the sites suitability for development against Policy R.1 in its own financial favour to the detriment of the residents | 2. Respondent is correct in its interpretation of Policy R.1 criteria with respect to open space need being weighed up against development need. With respect local authority 'conspiracy' in matters such as this, Estates dept would | |

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| | | | present a case for open space land to be made over for development, the Planning dept would analyse the strength of the case independently as part of the planning application process and the Site Allocations DPD process. Any application made by the Borough Council would automatically be presented to Committee and would therefore be in the public arena | |
| | | 3. Impact on wildlife, in particular, bats. Not aware of existence of detailed analysis | 3. See 156/268 above | |
| | | 4. Loss of recreation and play space | 4. Noted. Refer to response no. 145/228 | |
| | | 5. Vehicle speeds along Watery Lane are inadequately controlled | 5. Comments from the Highway Engineer conclude that the issue of speeding traffic in Watery Lane and Hoveton Close is undoubtedly down to local traffic as there is no through route | |
| | | 6. Position of Watery Lane/ | | |

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| | | Studley Road junction is poorly positioned for current traffic levels | 6. See 186/308 above | |
| | | 7. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath | 7. See 157/269 above | |
| | | 8. Requests that all residents of Watery Lane and Ravensmere Road are notified of the annual SHLAA update | 8. Results from actions associated with this site/ consultation period will determine whether it remains in the SHLAA or is removed. If it remains in the SHLAA, notification of any subsequent planning application would be sent to affected residents | |

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| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 189/311 (Print) | Objects to development of this site with respect to:<br>1. Impact of increased traffic along Watery Lane and Ravensmere Road<br>2. Loss of children's play space<br>3. Increase drainage/ flooding impact on existing development/ rear gardens (61 Ravensmere Road)<br>4. Site 'handed over' many years ago solely for recreational purposes | 1. See 157/268 above<br>2. Noted. Refer to response no. 145/228<br>3. See 157/269 above<br>4. No title deed information has been forthcoming to date to verify this point | See action at 145/228 above<br>4. Investigate land title deeds with Estates dept |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere | 190/312 (Taylor) | Objects to development of this site with respect to:<br>1. Increased traffic congestion in the Studley Road vicinity at what is already considered to be an | 1. See 186/308 above | See action at 145/228 above |

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| Road | | accident 'black spot'<br>2. Loss of recreation space and safe play space for children<br>3. Concerns of access between new development and Hoveton Close could cause a 'rat-run' through to the Studley Road, which is already a problem with motorcyclists. Unacceptable mix of pedestrian and vehicular use<br>4. Public footpath from Studley Road to Ravensmere Road would become a no go area at night time which already suffers from anti-social behaviour | 2. Noted. Refer to response no. 145/228<br>3. Comments from the Highways Engineer conclude that the issue of motorcyclists is a police matter for enforcement and not will be exacerbated by this proposal<br>4. Noted. Anti-social behaviour issues are taken into account as part of planning application consultation with Police and Secured by Design standards | |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 191/313 (Selwood) | Objects to development of this site with respect to: | This site was previously identified as a road reserve for the Alcester Highway extension, to connect to the Studley Bypass. The Bypass | See action at 126/198 above |

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| | | | scheme was subsequently revoked and the land not needed for transport development. Therefore development of the site in principle has previously been established | |
| | | 1. Concerns over social housing | 1. National Planning Policy (PPS3) requires all development of 15 dwellings or more to accommodate a percentage of affordable housing units. Requirements in Redditch are set out in the SPD on Affordable Housing (January 2008) | 1. None |
| | | 2. Pedestrian safety at crossing point adjacent to indicative road access | 2. See 183/305 above | |
| | | 3. Footpath provides a safe, straight route to the hospital | | |
| | | 4. Land provides a 'green lung' to buffer traffic pollution | 3. Footpath route should remain unaffected | |
| | | | 4 & 7. It is considered that traffic congestion will only increase at am & pm peak times as people leave/return a | 2. See 183/305 above |

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| | | | residential area. As such, noise and pollution are not currently considered to have a significant impact | |
| | | 5. Land provides a noise barrier from the dual carriageway | | 3. None |
| | | | 5. Land mass would not be flattened - no reason why development on this site should reduce current noise barrier from roundabout traffic | 4. & 7. None |
| | | 6. Impact on wildlife | | |
| | | 7. Increased traffic noise and pollution | 6. See 131/204 above | |
| | | | | 5. None |
| | | | | 6. See 131/204 above |
| UCS 9.1 – Land to the | 192/314 (Burgoyne- | Objects to development of this | | See action at 145/228 above |

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| rear of Watery Lane & Ravensmere Road | Elvins) | site with respect to:<br>1. Loss of recreation space and safe play space for children<br>2. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>3. Impact of increased traffic along Watery Lane and Ravensmere Road<br>4. Impact on wildlife | 1. Noted. Refer to response no. 145/228<br>2. & 3. See 157/269 above<br>4. See 156/268 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 193/315 (Abbott) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children<br>2. Increased traffic impact/ safety impact for Hoveton Close residents accessing Studley Road | 1. Noted. Refer to response no. 145/228<br>2. See 186/308 above | See action at 145/228 above |

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| | | 3. New development will ruin the aesthetics and community spirit of the area | 3. Aesthetics of a development is a consideration at any planning application stage. Community spirit is unlikely to be affected by 16 new dwellings | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 194/316 (Street) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children<br>2. Increase in childhood obesity | 1. Noted. Refer to response no. 145/228<br>2. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 195/317 (Sears) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road | 1. Noted. Refer to response no. 145/228<br>2. See 157/269 | See action at 145/228 above |
| UCS 9.1 – | 196/318 | Objects to development of this | 1. Noted. Refer to response no. | See action at 145/228 above |

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| Land to the rear of Watery Lane & Ravensmere Road | (Sears) | site with respect to:<br>1. Loss of recreation space<br>2. Increase in drainage/ flooding impact on existing development/ rear gardens (32 Ravensmere Road)<br>3. Impact of increased traffic along Watery Lane and Ravensmere Road<br>4. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath | 145/228<br>2. See 157/269 above<br>3. & 4. See 157/269 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 197/319 (Pearce) | Objects to development of this site with respect to:<br>1. Inadequate drainage and flooding concerns along Watery Lane and Ravensmere Road<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Impact of construction | 1. See 157/269 above<br>2. See 157/269 above | See action at 145/228 above |

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| | | related traffic<br>4. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>5. Loss of recreation space | 3. Disruption from construction is a temporary issue.<br>4. See 157/269 above<br>5. Noted. Refer to response no. 145/228 | |
| UCS 3.43 – Land east of Longfellow Close | 198/598 (Ridgeway) | Objects to development of this site with respect to:<br>1. Increased traffic flow through Close | 1. See 124/196 above | See 124/196 above |
| IN69 – Land to the rear of Alexandra Hospital | 199/322 (Bray) | 1. Site excluded from SHLAA. Land should immediately be designated for housing development | In light of the RSS EiP Panel Report and Redditch's requirement to find land for around 4000 dwellings within the Borough Boundary, this site will be investigated to determine the contribution it could make towards the housing target | Investigate contribution this site could make towards the housing target for 2010 SHLAA refresh |

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| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 200/326 (Orme) | Objects to development of this site with respect to:<br>1. Loss of recreation space and safe play space for children<br>2. Loss of Public Right of Way<br>3. Section 106 agreements to fund an infant play space not fully honoured | 1. Noted. Refer to response no. 145/228. There are no plans to remove the play area<br>2. Public Rights of Way would be retained<br>3. Comments from Leisure Services confirm that all monies collected far and allocated to the play area provision have been spent on this facility | See action at 145/228 above |
| UCS 3.43 – Land east of Longfellow Close | 201/327 (Poole) | Objects to development of this site with respect to:<br>1. Loss of open space/ recreation land<br>2. Effect on existing hedgerows, flora and fauna<br>3. Increased traffic flow through Close<br>4. Loss of on-street car parking bay<br>5. Other more suitable sites | 1. Noted. Refer to response no. 124/196<br>2. See 124/196 above<br>3. See 124/196 above<br>4. No definitive scheme is in place for this site and the | See 124/196 above |

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| | | than this are available for development | parking bay may be excluded<br><br>5. 56% of sites identified in the SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of greenfield land has had to be considered to meet the Borough's housing allocation | |
| SHLAA methodology | 202/334 (Tetlow King) | Objection to the manner in which sites have been assessed, resulting in a number of site groupings being excluded as 'competing land uses'. At odds with the purpose of the SHLAA. Approach dismisses consideration of a range of sites which has resulted in a reduced overall dwelling figure | Further to the CLG Good Practice Guidance (2007), PAS produced an additional guidance note (July 2008) to be read in conjunction with the CLG Guidance. Para 49 of the PAS note states that *"whilst the assessment will address whether sites are suitable for housing, this should only be taken to mean that they are suitable provided they are not required for other purposes"* [my emphasis]. Para 50 goes on to state that *"sites should not be included in the SHLAA which are not considered* | None |

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| SHLAA methodology | 202/334 (Tetlow King) | | *suitable or potentially suitable for housing. This would present confusing messages… Moreover, their inclusion could give unwarranted credibility to such sites."* Officers consider that the para 6.6 bullet points of the SHLAA offer sufficient justification for the exclusion of sites where conflicting land uses may be an issue. The SHLAA states that such sites will be investigated at an appropriate time to establish whether they might contribute to the SHLAA if deemed necessary | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 203/460 (Tabor) | Objects to development of this site with respect to:<br>1. Loss of recreation space / play space for children<br>2. Increase in childhood obesity<br>3. Recent factory closures would make brownfield sites more appropriate for | 1. Noted. Refer to response no. 145/228<br>2. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile<br>3. The Council has a need to safeguard existing employment land for employment uses. 56% of sites identified in the SHLAA are on brownfield land. | See action at 145/228 above |

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| | | development<br>4. Drainage/ sewage problems in this area | The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of greenfield land has had to be considered to meet the Borough's housing allocation<br>4. See 157/269 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 204/339 (Luckman) | Objects to development of this site with respect to:<br>1. Impact of increased traffic and emergency service access along Watery Lane<br>2. Anti social behaviour outside 1 Hoveton Close including excessive pedestrians (100 a day at weekends), dropped litter, late night noise from people leaving taxis, around 50 cars a day turning round in Close. Fear that more houses will increase this problem<br>3. Impact on infrastructure in | 1. See 157/269 above<br>2. Noted, however this is not a spatial planning issue | See action at 145/228 above |

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| | | Watery Lane<br>4. Loss of recreation space<br>5. Access to Arrow Valley Lake from Hoveton Close needs blocking off as unsafe walking route and would reduce foot traffic through Hoveton Close<br>6. Council should buy some of the unsold houses in Redditch to get the housing market moving again | 3. See 157/269 above<br>4. Noted. Refer to response no. 145/228<br>5. Not a spatial planning issue and unlikely that a public right of way would be closed<br>6. Buying unsold houses would not eradicate the need for the Core Strategy to address Redditch's growing population needs up to 2026 and make provision for additional homes | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere | 205/340 (Gorton) | Objects to development of this site with respect to:<br>1. Loss of recreation space / play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |

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| Road | | 2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>4. Impact of development on Watery Lane/ Studley Road junction | 2. & 3. See 157/269 above<br>4. See 186/308 | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 207/342 (Fry) | Objects to development of this site with respect to:<br>1. Loss of recreation space / safe play space for children<br>2. Why are more houses needed in Greenlands? Credit crunch/recession would make them unaffordable and be a waste of time building them<br>3. Increased traffic congestion | 1. Noted. Refer to response no. 145/228<br>2. Credit crunch/ recession is not a spatial planning issue. The allocation of land for dwellings is to meet the growing population needs of Redditch up to 2026 and is necessary irrespective of economic climate<br>3. See 186/308 above. | See action at 145/228 above |

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| | | in the Studley Road vicinity at what is already considered to be an accident 'black spot' | Furthermore, crossing points are provided on Studley Road adjacent to Hoveton Close and at the Barlich Way junction, both are considered to be in the optimum position for school access. The siting of Bus stops is in line with government recommendations | |
| | | 4. Increase in childhood obesity | 4. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 209/345 (Harris) | Objects to development of this site with respect to:<br>1. Loss of recreation space / safe play space for children<br>2. Facility contributes to community cohesion<br>3. Loss of natural surveillance of play area and noise nuisance for new properties from existing play area | 1 & 2. Noted. Refer to response no. 145/228<br>3. Noted. Natural surveillance issues are taken into account as part of planning application consultation with Police and Secured by Design standards | See action at 145/228 above |

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| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 211/347 (Wood) | Objects to development of this site with respect to:<br>1. Loss of recreation space / safe play space for children<br>2. Children play on road in Hoveton Close. Speed of traffic along Hoveton Close is a danger | 1. Noted. Refer to response no. 145/228<br>2. See 207/342 above | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 213/354 (Davies) | Objects to development of this site with respect to:<br>1. Loss of recreation space / safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 214/355 (Ridge) | Objects to development of this site with respect to:<br>1. Loss of recreation space / safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 5.20 – Land off Lady Harriet's | 215/356 (Whitfield) | Objects to development of this site with respect to:<br>1. SHLAA analysis form states | | See action at 176/295 above |

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| Lane | | that there is no Public Right of Way on site. 'Leafields' has private right of way access | 1. Noted. Officer considers that the analysis form is correct in stating that no Public Right of Way exists | |
| | | 2. Each property boundary along Lady Harriet's Lane runs along the centre line of the Lane. Access to site would require crossing private land. Restrictive covenants to prevent nuisance and damage nuisance may result in compensation claims | 2. Noted. Extent of ownership boundaries confirmed with Legal team. | |
| | | 3. Concerns over passing space for vehicles accessing the single track lane | 3, 4 & 5. See 176/295 | |
| | | 4. Pedestrian safety as there is no pavement | | |
| | | 5. Impact of increased traffic on junction of Lady Harriet's Lane/ Easemore Road | | |
| | | 6. Light pollution from all weather sports pitch | | |

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| | | effecting proposed development | | |
| | | 7. Impact on wildlife (bats, foxes, birds) | 6. Existing boundary planting should offer screening | |
| | | 8. Site has historical significance | 7. Biodiversity unable to gain access to the site as gated and locked and in school ownership | |
| | | | 8. Historic Environment Records (HER) at Worcestershire County Council was contacted to investigate this claim further. HER investigation reveals that there was a small building on the site in 1886 but it does not appear on the earlier 1813 map but it may have been too small to have been drawn. This is the only finding within the site. The field pattern suggests Parliamentary Enclosure but there is no further information to suggest historic significance. This information alone would | |
| | | 9. Effect on current public utilities (low water pressure, drain blockages) | | |

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| | | | not preclude development of this site | |
| | | | 9. Comments from the Assets Maintenance Officer conclude that there maybe, subject to STW approval, capacity for additional foul drainage to the existing public sewer network. Surface water will require balancing to green-field run-off, prior to discharge. Connections to the public foul sewer may be possible require relatively short, off-site works. However, the existing foul sewer is only 100mm diameter and there is no surface water sewer - nearest available, subject to levels, is situated within Easemore Road. If water pressure is already a problem, then additional dwellings would certainly make matters worse. Again, due to probable inadequate size, the existing foul drain problems are likely to get worse although it could be | |
| | | 10. Disruption to existing residents if services need upgrading<br>11. Loss of privacy and light to 'Cropthorne' | | |

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| | | | due to lack of flow<br>10. Disruption from such work is a temporary issue<br>11. Issues such as overlooking and loss of light are considered as part of the planning application process | |
| UCS 8.10 – Land at McDonalds Island, Oakenshaw | 216/357 (Prevett) | Objection to proposed building of around 30 dwellings as outlined in Redditch Matters | Noted | See action at 126/198 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 218/359 (Turner) | Objects to development of this site with respect to:<br>1. Loss of recreation space / safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the | 219/360 | Objects to development of this | 1. Noted. Refer to response no. | See action at 145/228 above |

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| rear of Watery Lane & Ravensmere Road | (Turner) | site with respect to:<br>1. Loss of recreation space / safe play space for children | 145/228 | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 220/362 (Forbes) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Increase in childhood obesity<br>3. Use brownfield sites in Redditch such as Alcan and land by Redditch Station | 1. Noted. Refer to response no. 145/228<br>2. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile<br>3. The Council has a need to safeguard existing employment land for employment uses and other land for essential uses such as town centre functions. 56% of sites identified in the SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of greenfield land has had to be considered to meet the | See action at 145/228 above |

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| | | | Borough's housing allocation | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 221/363 (Buck) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Existing flooding issues in the local area would be exacerbated<br>3. Use other, more run down sites for housing rather than green areas | 1. Noted. Refer to response no. 145/228<br>2. See 157/269 above<br>3. 56% of sites identified in the SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of greenfield land has had to be considered to meet the Borough's housing allocation | See action at 145/228 above |

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| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 222/364 (Norton) | Objects to development of this site with respect to:<br>1. Loss of Primarily Open Space which is used by residents in Greenlands & Lodge Park Wards which have an under-provision of open space<br>2. No direct access to the site from Studley Road. Only accessible from Watery Lane which would be a very indirect route to reach new houses<br>3. Width of Watery Lane for increased traffic and access for construction traffic<br>4. Impact on Watery Lane/ Studley Road junction from construction traffic causing congestion<br>5. Impact of emergency service access along Ravensmere Road | 1. Noted. Refer to response no. 145/228<br>2. Noted but access from Studley Road is not a necessity<br>3. & 5. See 157/269 above<br>4. See 186/308 above. However, disruption from construction traffic is temporary | See action at 145/228 above |

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| | | 6. Inadequate drainage and flooding concerns along Watery Lane and Ravensmere Road. Marked as 'Historic Flooding Site 88' in Strategic Flood Risk Assessment (SFRA) | 6. See 157/269 above. Furthermore, the site is not within the Environment Agency Flood Zones 2 or 3. Historic flooding records (SFRA) states that approximately 7 dwellings flooded in July 2007 due to mechanical, structural or operational failure and localised surface water flooding. This , unlike other historic listings is not listed as a repeated incident | |
| | | 7. Core Strategy, when adopted will include policy H.2 which states the importance of protecting and enhancing open space. 4 of the 6 policy criteria are extremely relevant to the protection of this site against development. | 7. Policy H.2 in the Preferred Draft Core Strategy is derived from the existing BORLP 3 Policy R.1. The criteria are used to assess the open space need weighed up against development need. Developers would present a case for open | |

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| | | | space land to be made over for development, the Planning dept would analyse the strength of the case independently as part of the planning application process and the Site Allocations DPD process | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 225/368 (May) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact on wildlife<br>3. Impact on Watery Lane/ Studley Road junction as Studley Road is busy and fast | 1. Noted. Refer to response no. 145/228<br>2. See 156/268 above<br>3. See 186/308 above | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 226/369 (Stait) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ play space for children<br>2. Impact of increased traffic along Watery Lane and | 1. Noted. Refer to response no. 145/228<br>2. & 3. See 157/269 above | See action at 145/228 above |

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| | | Ravensmere Road<br>3. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>4. Increase in childhood obesity | 4. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 227/370 (Morgan) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere | 228/371 (Ingles) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |

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| Road | | 2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath | 2. & 3. See 157/269 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 229/372 (Farley) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 230/373 (Ullah) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Safety issue of Watery Lane properties fronting directly onto Watery Lane | 1. Noted. Refer to response no. 145/228<br>2. & 3. See 157/269 above | See action at 145/228 above |

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| | | and lack of footpath<br>4. Inadequate drainage and flooding concerns along Watery Lane<br>5. Increase drainage/ flooding impact on existing development/ rear gardens (Ravensmere Road)<br>6. Significant impact on property values | 4. See 157/269 above<br>5. See 157/269 above<br>6. Noted but not a spatial planning matter | |
| UCS 3.43 – Land east of Longfellow Close | 231/374 (Lewis) | Objects to development of this site with respect to:<br>1. Loss of open space/ safe recreation land. Council's Culture & Recreation chapter of Local Plan No.3 states that it is important to protect and enhance open space so why destroy it | 1 & 2. Noted. Refer to response no. 124/196. Policy R.1 in BORLP 3 has criteria which are used to assess the open space need weighed up against development need. Developers would present a case for open space land to be made over for development, | See 124/196 above |

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| | | | the Planning dept would analyse the strength of the case independently as part of the planning application process and the Site Allocations DPD process. | |
| | | 2. Access to open space reduces health risks and crime related offences | 2. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile. | |
| | | 3. Increased traffic flow through Close<br>4. Existing school-run traffic parks opposite Longfellow Close<br>5. Effect on existing wildlife | Contextual information indicates that the perception of crime appears high. However, the Redditch Scoping Report (April 2009) shows that the recorded crime change 2006/07-2007/08 decreased by 4% in Redditch compared to 3% in West Mercia. 'Places and Spaces' policy in the Core Strategy would address such issues<br>3. See 124/196 above<br>4. Noted but not a spatial | |

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| | | 6. Development will be on a flood plain. Strategic Flood Risk Assessment (SRFA) states that Wharrage Brook is classed as a flood risk | planning matter<br><br>5. See 124/196 above<br><br>6. See 124/196 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 232/375 (Orange) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of increased traffic<br>3. Ravensmere Road suffers with drainage issues | 1. Noted. Refer to response no. 145/228<br>2. See 157/269 above<br>3. See 157/269 above | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 233/376 (Taylor) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ play space for children<br>2. Impact on Watery Lane/ Studley Road junction as Studley Road is busy and fast. Many parked cars on Studley Road at school drop off/collection times. | 1. Noted. Refer to response no. 145/228<br>2. See 186/308 & 207/342 above | See action at 145/228 above |

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| | | Bus stop in this vicinity<br>3. Anti social behaviour is uncontrolled and bus stops are continually smashed<br>4. Concerns of access between new development and Hoveton Close could cause a 'rat-run' through to the Studley Road, which is already a problem with motorcyclists. Unacceptable mix of pedestrian and vehicular use | 3. Noted. Anti-social behaviour issues are taken into account as part of planning application consultation with Police and Secured by Design standards<br>4. See 190/312 above. However, not a spatial planning matter | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 234/377 (Anderson) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Safety issue of Watery | 1. Noted. Refer to response no. 145/228<br>2. & 3. See 157/269 above | See action at 145/228 above |

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| | | Lane properties fronting directly onto Watery Lane and lack of footpath | | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 235/378 (Deaves) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of childhood obesity<br>3. Impact on wildlife (bats)<br>4. Impact of increased traffic along Watery Lane and Ravensmere Road<br>5. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>6. Inadequate drainage and flooding concerns along Watery Lane<br>7. Impact on Watery Lane/ Studley Road junction as | 1. Noted. Refer to response no. 145/228<br>2. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile<br>3. See 156/268 above<br>4. & 5. See 157/269 above<br>6. See 157/269 above | See action at 145/228 above |

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| | | Studley Road is busy and fast. Many parked cars on Studley Road at school drop off/collection times | 7. See 186/308 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 236/379 (Perkins) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Loss of facility may increase anti social behaviour<br>3. Impact of childhood obesity<br>4. Impact of increased traffic along Watery Lane and Ravensmere Road<br>5. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath | 1. Noted. Refer to response no. 145/228<br>2. Noted. Anti-social behaviour issues are taken into account as part of planning application consultation with Police and Secured by Design standards<br>3. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile<br>4. & 5. See 157/269 above | See action at 145/228 above |

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| | | 6. Ravensmere Road is a cul-de-sac, making it a thoroughfare would be detrimental to the area<br>7. Impact on existing flooding issues in the vicinity<br>8. 16 houses wont make any difference to the current housing issues. Build on larger areas such as Windsor Road development. There are empty offices and old factory sites in Redditch which could easily accommodate more than 16 houses | 6. Indicative scheme suggests that Ravensmere Road would remain a cul-de-sac if development were to take place<br>7. See 157/269 above<br>8. Any size site will make a contribution to the Borough's housing allocation. The Council has a need to safeguard existing employment land for employment uses and other land for essential uses such as town centre functions. 56% of sites identified in the SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of greenfield land has had to be considered to meet the | |

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| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 236/379 (Perkins) | | Borough's housing allocation | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 237/380 (Kite) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 238/381 (Kondola) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Pedestrians at greater risk from traffic when accessing path across playing field<br>3. Impact of increased traffic along Watery Lane and | 1. Noted. Refer to response no. 145/228<br>2. Highway and footpath standards and safe access to public rights of way would be a consideration at planning application stage<br>3. & 4. See 157/269 above | See action at 145/228 above |

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| | | Ravensmere Road<br>4. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>5. Impact on existing flooding issues in the vicinity | 5. See 157/269 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 239/382 (Gee) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of childhood obesity<br>3. Impact of increased traffic on already overcrowded roads | 1. Noted. Refer to response no. 145/228<br>2. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile<br>3. See 157/269 above | See action at 145/228 above |
| UCS 9.1 – | 240/383 | Objects to development of this | 1. Noted. Refer to response no. | See action at 145/228 above |

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| Land to the rear of Watery Lane & Ravensmere Road | (Dicker) | site with respect to:<br>1. Loss of recreation space/ safe play space for children | 145/228 | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 241/384 (Smith) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>4. Impact on childhood obesity<br>5. Impact on existing flooding issues in the vicinity | 1. Noted. Refer to response no. 145/228<br>2. & 3. See 157/269 above<br>4. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile | See action at 145/228 above |

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| | | | 5. See 157/269 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 242/385 (Ray) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact on existing flooding and sewage issues in the vicinity<br>3. Impact of increased traffic along Watery Lane and Ravensmere Road<br>4. Many parked cars on Studley Road at school drop off/collection times add to traffic congestion<br>5. Playing field acts as a rainwater soakaway<br>6. Impact on wildlife | 1. Noted. Refer to response no. 145/228<br>2. See 157/269 above<br>3. See 157/269 above<br>4. See 186/308 and 207/342 above<br>5. See 157/269 above. Other issues have been raised regarding rear garden flooding from rainwater along Ravensmere Road so it is | See action at 145/228 above |

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| | | 7. Loss of quality of life | questionable whether the playing field is sufficient as a soak away<br>6. See 156/268 above<br>7. Noted. Quality of life is a very important element of spatial planning. However, striking an appropriate and harmonious balance in Redditch is currently hampered by the fact that the available land identified in the SHLAA to meet the Regional Housing Allocation for the Borough falls short of this allocation | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 243/386 (Watkins) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Detrimental effect on property values<br>3. Impact of increased traffic along Watery Lane and | 1. Noted. Refer to response no. 145/228<br>2. Impact on property values is not considered to be a spatial planning matter<br>3. See 157/269 above | See action at 145/228 above |

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| | | Ravensmere Road<br>4. Impact on existing flooding issues of Ravensmere Road gardens | 4. See 157/269 above | |

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| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 244/387 (Towler) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 245/388 (Arnott) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Additional congestion on Studley Road<br>3. More suitable sites in Redditch for development such as derelict factory units | 1. Noted. Refer to response no. 145/228<br>2. See 186/308 above<br>3. The Council has a need to safeguard existing employment land for employment uses and other land for essential uses such as town centre functions. 56% of sites identified in the SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of | See action at 145/228 above |

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| | | | greenfield land has had to be considered to meet the Borough's housing allocation | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 246/389 (Mellor) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children | 1. Noted. Refer to response no. 145/228 | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 247/390 (Russo) | Objects to development of this site with respect to:<br>1. Impact on existing flooding issues in the vicinity of Studley Road | 1. See 157/269 above | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 248/391 (Carroll) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of increased traffic along Watery Lane and | 1. Noted. Refer to response no. 145/228<br>2. See 157/269 above | See action at 145/228 above |

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| | | Ravensmere Road<br>3. Detrimental effect on property prices | 3. Impact on property values is not considered to be a spatial planning matter | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 249/392 (Smith) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Recreational ground donated by builder of Watery Lane homes | 1. Noted. Refer to response no. 145/228<br>2. See 157/269 above<br>3. Title deed information indicates that the land was purchased by Redditch Urban District Council in 1957 from Reginald Charles Martin. There is no indication that this land was to remain in recreation use | See action at 145/228 above |
| UCS 9.1 – Land to the rear of | 250/393 (Peel) | Objects to development of this site with respect to: | | See action at 145/228 above |

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| Watery Lane & Ravensmere Road | | 1. Loss of recreation space/ safe play space for children<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Recreational ground donated by builder of Watery Lane homes | 1. Noted. Refer to response no. 145/228<br>2. See 157/269 above<br>3. See 249/392 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 251/394 (Shelton) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Recreational ground left to residents in a will<br>3. Impact of increased traffic along Watery Lane and Ravensmere Road<br>4. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath | 1. Noted. Refer to response no. 145/228<br>2. See 249/392 above<br>3. & 4. See 157/269 above | See action at 145/228 above |
| UCS 9.1 – | 252/395 | Objects to development of this | | See action at 145/228 above |

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| Land to the rear of Watery Lane & Ravensmere Road | (Laight) | site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Recreational ground left to residents in a will<br>3. Impact of childhood obesity<br>4. Impact of increased traffic along Watery Lane and Ravensmere Road<br>5. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>6. Detrimental effect on property prices | 1. Noted. Refer to response no. 145/228<br>2. See 249/392 above<br>3. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile<br>4. & 5. See 157/269 above<br>6. Impact on property values is not considered to be a spatial planning matter | |
| UCS 9.1 – Land to the | 253/396 | Objects to development of this | | See action at 145/228 above |

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| rear of Watery Lane & Ravensmere Road | (Gough) | site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of childhood obesity<br>3. Road running right through field would make remaining field unsafe<br>4. Impact of increased traffic along Watery Lane and Ravensmere Road<br>5. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>6. Detrimental effect on property prices | 1. Noted. Refer to response no. 145/228<br>2. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile<br>3. There are no plans for the road to extend beyond the area identified as having housing potential<br>4. & 5. See 157/269 above<br>6. Impact on property values is not considered to be a spatial planning matter | |

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| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 254/397 (Bradbury) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Existing sewage system prone to flooding<br>4. Impact on well established community | 1. Noted. Refer to response no. 145/228<br>2. See 157/269 above<br>3. See 157/269 above<br>4. Community spirit is unlikely to be affected by 16 new dwellings | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 255/398 (Mason) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact on health/obesity | 1 & 9. Noted. Refer to response no. 145/228<br>2. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile | See action at 145/228 above |

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| | | 3. Impact of increased traffic along Watery Lane and Ravensmere Road | 3. See 157/269 above | |
| | | 4. Existing sewage system prone to flooding | 4. See 157/269 above | |
| | | 5. Reduction in quality of life of existing residents | 5. Noted. Quality of life is a very important element of spatial planning. However, striking an appropriate and harmonious balance in Redditch is currently hampered by the fact that the available land identified in the SHLAA to meet the Regional Housing Allocation for the Borough falls short of this allocation | |
| | | 6. Impact on Watery Lane/ Studley Road junction which bottlenecks at peak times | 6. See 186/308 above | |
| | | 7. Impact on wildlife (including bats) | 7. See 156/268 above | |
| | | 8. Watery Lane and Ravensmere Road prone to flooding | | |

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| | | 9. OSNA states that Greenlands is poorly provided for in terms of open space | 8. See 157/269 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 256/399 (Whitcombe) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ play space for children<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road | 1. Noted. Refer to response no. 145/228<br>2. See 157/269 above | See action at 145/228 above |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 257/400 (Cooke) | Objects to development of this site with respect to:<br>1. Moved here for peaceful location<br>2. Loss of recreation space/ safe play space for children<br>3. Impact of increased traffic along Watery Lane and Ravensmere Road<br>4. Area already prone to flooding | 1. Noted but not a spatial planning issue<br>2. Noted. Refer to response no. 145/228<br>3. See 157/269 above | See action at 145/228 above |

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| | | 5. Detrimental effect on property prices | 4. See 157/269 above<br>5. Impact on property values is not considered to be a spatial planning matter | |
| UCS 2.16 – Land to the rear of Sandygate Close | 258/401 (Friar) | Objects to development of this site with respect to:<br>1. Impact on wildlife | 1. Comments from the Biodiversity Officer conclude that wildlife interest comes in the form of a thick hedge/ shrub area, with mature trees contained within it, which runs around the edge of the site. There are three or four large ash trees and a smaller oak tree. There are also several other smaller trees of different species present as well. The size of these trees means that they will have roots which will obviously run for several metres under the open space land. Any disturbance of the open space area would have a | See action at 138/221 above |

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| | | | very detrimental effect on the trees located around the edge of the open space site. The thick hedge and the trees will provide nesting sites for birds. It is also likely that bats will certainly be flying over and feeding here. They may be present actually in the mature trees, although unable to get close to the trees to inspect them, due to some very thick shrubs in front of them. An ecological survey to test for the presence of bats will be needed for this site. | |
| UCS 2.16 – Land to the | | 2. Loss of residents privacy<br>3. Webheath has had more | Furthermore, the site appears to have an important function in acting as area which allows rainwater to soak away. Apparently for much of the year the ground which rises to the east is very wet and quite boggy. There may also be small springs which can suddenly appear at times of | |

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| rear of Sandygate Close | 258/401 (Friar) | than its share of housing development<br><br>4. Implications for flooding | heavy rainfall<br><br>2. Noted. Unsure how privacy will be lost<br><br>3. The SHLAA has investigated the whole of Redditch's urban area in an effort to find sites which contribute towards its housing allocation<br><br>4. Comments from the Assets Maintenance Officer conclude that there maybe, subject to STW approval, capacity for additional foul and surface water drainage to the existing public sewer network. Surface water will require balancing to green-field run-off, prior to discharge to a public sewer. Not aware of any flooding issues in the vicinity. Discharge limits are likely with approved measures to achieve such criteria. | |
| UCS 3.43 – Land east of Longfellow | 259/402 (Wright) | Objects to development of this site with respect to: | 1. Noted. Refer to response no. 124/196 | See 124/196 above |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Close | | 1. Loss of open space<br>2. Impact on wildlife<br>3. Originally a water catchment area and should not be built upon | 2. See 124/196 above<br>3. See 124/196 above | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 260/403 (Edmonds) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ play space for children<br>2. Against government campaign to encourage people to be more active<br>3. Impact of increased traffic along Watery Lane and Ravensmere Road<br>4. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>5. Area already prone to flooding<br>6. Detrimental effect on | 1. Noted. Refer to response no. 145/228<br>2. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile<br>3. & 4. See 157/269 above | See action at 145/228 above |

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| | | property prices | 5. See 157/269 above<br>6. Impact on property values is not considered to be a spatial planning matter | |
| Mettis Aerospace | 264/446/458 (CB Richard Ellis) | The Mettis Aerospace site was previously submitted for consideration for inclusion in the SHLAA in March 2008. The site was eliminated from detailed consideration stating that its requirement for employment uses was to be reviewed in the first instance in the ELR. The site may become unsuitable or unviable within its current employment use in the medium term. ON-site constraints such as flood risk and a watercourse could only be mitigated against if there was a high-value end-use such as housing. This site should be reconsidered by the SHLAA for residential use | The Employment Land Review, Stage 3 (March 2009) concludes that this site should be maintained for employment uses (p. 89). There is no need to consider this site further for inclusion in the SHLAA | None |
| UCS 3.43 – Land east of Longfellow | 266/459 (O'Toole) | Objects to development of this site with respect to: | 1 & 2. Indicative scheme indicates that existing footpaths would remain untouched as a | See 124/196 above |

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| Close | | 1. Pathway would be moved<br>2. Children cross the field to school<br>3. Increased traffic flow through Longfellow Close<br>4. Loss of on-street car parking bay<br>5. Impact on wildlife (bats)<br>6. Loss of open space | consequence of development. Children will still have access to school<br>3. See 124/196 above<br>4. No definitive scheme is in place for this site and the parking bay may be excluded<br>5. See 124/196 above<br>6. See 124/196 above | |
| | 267/573/579 (Barton Willmore) | Notes that WYG considers the Council's assumptions in respect of dwellings to be delivered through SHLAA to be unambitious and identify a potential capacity across the Borough for a further 187 dwellings | In light of the RSS EiP Panel Report, and Redditch's requirement to find land for 4000 dwellings within the Borough boundary, officers need to identify sufficient land to meet its housing target | Officers to identify sufficient land to meet the RSS housing target for Redditch of 4000 dwellings |
| L4L01 – Land off Banners Lane | 268/596 (Richardson) | Unsure of location of potential site but has concerns regarding: | 1. Comments from Highways Engineer conclude that there are no highway implications | Scheme revision takes this capacity below the SHLAA threshold and should therefore |

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| | | 1. Increased traffic along Banners Lane<br>2. Lack of parking | associated with the construction of five dwellings in this location. The capacity of Banners Lane is sufficient to accommodate the additional traffic without the need for improvement<br>2. Parking spaces for additional dwellings would be provided as part of a development scheme | be removed from the SHLAA |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 269/230 (Grant) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact of increased traffic along Watery Lane and Ravensmere Road<br>3. Safety issue of Watery Lane properties fronting directly onto Watery Lane and lack of footpath<br>4. Inadequate drainage and flooding concerns along Watery Lane | 1. Noted. Refer to response no. 145/228<br>2. & 3. See 157/269 above | See action at 145/228 above |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | 5. Increase drainage/ flooding impact on existing development/ rear gardens (Ravensmere Road)<br>6. Significant impact on property values | 4. & 5. See 157/269 above<br>6. Noted but not a spatial planning matter | |
| UCS 9.1 – Land to the rear of Watery Lane & Ravensmere Road | 270/765 (Coward) | Objects to development of this site with respect to:<br>1. Loss of recreation space/ safe play space for children<br>2. Impact on Studley Road due to increased traffic, poorly sighted bus stops and no safe crossing area for school children<br>3. There are other more suitable sites in Redditch for new housing | 1. Noted. Refer to response no. 145/228<br>2. See 186/308 and 207/342 above<br>3. 56% of sites identified in the | See action at 145/228 above |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | | SHLAA are on brownfield land. The search for available and deliverable brownfield sites has been exhausted through this process and the inclusion of greenfield land has had to be considered to meet the Borough's housing allocation | |
| | | 4. Impact on well being of local residents | 4. Noted. Quality of life is a very important element of spatial planning. However, striking an appropriate and harmonious balance in Redditch is currently hampered by the fact that the available land identified in the SHLAA to meet the Regional Housing Allocation for the Borough falls short of this allocation | |
| | | 5. Impact of childhood obesity | 5. Noted. Refer to response no. 142/225 for comments on Redditch Health Profile | |
| UCS 8.10 – Land at McDonalds Island, | 271/766 (Tipper) | Concerns about possible development of this site having an impact on the following:<br>1. Increased traffic congestion | This site was previously identified as a road reserve for the Alcester Highway extension, to connect to the Studley Bypass. The Bypass | See action at 126/198 above |

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| Oakenshaw | | at roundabout especially at peak periods – roundabout would need traffic lights<br>2. Loss of green space and footpaths | scheme was subsequently revoked and the land not needed for transport development. Therefore development of the site in principle has previously been established<br>1. See 126/198 above<br>2. Noted. Refer to response no. 126/198. No footpaths are expected to be lost as a result of this development | |
| RB003 - Widney House & adjoining land, Bromsgrove Road | 272/1000 (Clack) | Objection to inclusion of site in the SHLAA and query of accuracy of survey information with respect to:<br>1. '*Current Land Use: Industrial & part unused/vacant'* – no unused land included<br>2. There is no scrub land, only a sports field that is not mown<br>3. Part of the site is a sports field and should count as a | 1. & 2. Land between Widney Works and the sports pitch is unused scrub land<br>3. Noted and agreed | 1. & 2. None<br>3. SHLAA refresh in April 2010 |

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| | | greenfield site<br>4. Removal of a sports pitch in an area already short of provision should count as an adverse impact | 4. Comments from Leisure Services conclude that the playing field does not form part of the current playing pitch provision and is used by Redditch United informally, all playing pitch requirements can be accommodated within existing formal playing field provision adjacent to the site in question | will acknowledge that the site is brownfield and greenfield<br>4. None |
| RB003 - Widney House & adjoining land, Bromsgrove Road | 273/1001 (Bonham) | Objection to inclusion of site in the SHLAA and query of accuracy of survey information with respect to:<br>1. Location of new access point for the site between Vicarage Crescent and respondents house would increase congestion and would form a staggered crossroad<br>2. Loss of sports land in this area | 1. Comments from the Highways Engineer conclude that whilst there is unlikely to be a major issue introducing an additional volume of traffic onto Bromsgrove Road, the volume indicated would require a Transport Assessment to accompany any Planning Application, to identify any potential problem areas in the vicinity of the site, together with any improvements to public transport facilities and the | 1. None<br>2. None |

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| | | | walking/cycling network. The existing access is considered unsuitable in its current form to serve the maximum number of dwellings; approximately 50 units are considered to be the maximum from this access point.<br><br>Subject to any additional access meeting the relevant design criteria, there would be no objection to this provision to further serve the site<br><br>2. See 272/1000 above | |

## *Sustainability Appraisal*

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Sustainability Appraisal | 088/529; Natural | Support inclusion of an HRA Screening Assessment within | Noted. Reference to the response from Natural England | Add the following to the SA Habitats Assessment Section |

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| | England | the SA. The distance to the site provides further evidence that a full HRA is not necessary and should be stated in the report. | will be made in the SA Report. | of the SA ***"Natural England responded to the consultation on the Preferred Draft Core Strategy confirming that full HRA would not be required due to the distance between the Borough and Bredon Hill SAC."*** |
| Sustainability Appraisal | 104/023; RPS | The SA process has not complied with the requirements for SA under the Town and Country Planning Act and the associated regulations, nor has it complied with the SEA/Directive or Habitats Directive. Because it does not appraise realistic alternatives to the approach set out in the Core Strategy, in addition to not appraising the Core Strategy itself. The SA Core Strategy report has not responded to consultation representations from RPS promoting an urban extension, nor has it considered more significantly the wider significance of appraising options for sustainable urban | The SA process is fully SEA compliant and has been prepared in line with the guidance for Regional Planning Bodies and Local Planning Authorities 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (November 2005). RBC had to assess the implications of the WYG Stage I and II findings to be able to consider all alternative options. With regards to assessment of the SUE proposed by RPS, the Borough Council undertook a full SA of the WYG development areas and the five options in WYG, which include the area in question. This can | No change. |

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| | | extensions. RPS expects detailed SA of all strategic options and alternatives.<br><br>Question whether the current SA report appraises the significance of the effects associated with the Core Strategy. | be seen in the Sustainability Appraisal refresh (Consultation 1 February 2010 - 15 March 2010).<br><br>See Table 2: 'Matrix testing the compatibility of the sustainability appraisal objectives and the draft DPD objectives and assessing the cumulative effects of the DPD Objectives'. Objectives have been assessed to determine where significant effects are predicted from implementing more than one of the Objectives, and see also 'Cumulative impacts from the matrix testing the compatibility of the SA Objectives and the draft DPD Objectives.' The Options Appraisal of each issue and options also appraises the significance of each option being implemented in terms of their magnitude, their geographical scale, the time period over which they will occur, whether they are permanent or temporary, | No change. |

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| | | | positive or negative, probable or improbable, frequent or rare, and whether or not there are cumulative and/or synergistic effects. | |
| Sustainability Appraisal | 262/416; Homes & Communities Agency | The WYG Stage II Report considers growth options for Redditch in general terms. However, it is not accompanied by an appraisal of the sustainability credentials of each of the growth options for Redditch carried out using the sustainability criteria set out in the RSS. | The Borough Council undertook a full SA of the WYG development areas and the five WYG options, tested against Redditch's SA Framework. SA of the options in and around Redditch Borough should not be assessed against the Regional Sustainable Development Framework as this would not be meaningful. The RSDF did however influence the SA Framework against which the options are assessed. | No change. |
| Sustainability Appraisal | 267/586; Barton Wilmore c/o Barratt Homes and Taylor Wimpey | SA does not have an audit trail demonstrating how the preferred option has been arrived at and there is no evidence to demonstrate how the different options perform. | Further evidence in support of the preferred options will be provided in the Technical Papers to be completed as part of the evidence base for the Core Strategy. In addition, the SA appraisal of options for each issue includes a summary explaining what the SA | Production of series of Technical Papers are part of the Core Strategy Evidence Base and consider where more clarity over options selected as Preferred options have been arrived at. |

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| | | The SA is not specific to the assessment of the existing ADR sites. | determines to be the most appropriate options for consideration as the preferred option for the Core Strategy. More clarity can also be provided in the SA.<br><br>The Borough Council undertook a full SA of the WYG development areas and the final five options, tested against Redditch's SA Framework. This can be seen in the Sustainability Appraisal refresh. Specific site appraisals may be more appropriate for EIA of the site. | None. |
| Sustainability Appraisal | 267/594; Barton Wilmore c/o Barratt Homes and Taylor Wimpey | Reduce the impacts of climate change / encourage renewable energy provision - Bordesley Park secures a positive rating here as opposed to all other sites which score negatively, on the basis of economies of scale and potential to introduce low carbon technology. Policy B(BE).1 requires all development to include 10% renewable energy provision so all should achieve the same | There are other considerations such as the distance of the options from the Town Centre, which influence this score. The proximity of Bordesley Park to the Town Centre means it would have less of an impact on carbon emissions than most other sites as there is likely to be lower emissions from transportation, greater accessibility and encouragement for modal | No change. |

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| | | standards.<br><br>Opportunities for sustainable modes of travel - same scoring as above for the same reasons. All sites under construction are of a sufficient size and scale to achieve some form of modal shift. Webheath ADR should be positively scored (see submitted accessibility strategy).<br><br>Will it support tourism - No justification for Bordesley Park scoring positive and others negative. | shifts.<br><br>Similar to above, this appraisal has been assessed taking into account proximity of options to the town centre and which option has the greatest accessibility to sustainable transport. Compared with some other options the Webheath ADR has not been judged to be as accessible to the town centre, so the scoring is reasonable.<br><br>This judgement is only based upon the closer proximity and ease of access from this option to the major tourist attractions in Redditch Borough, e.g. the Town Centre, Bordesley Abbey, Forge Mill museum. The matrix on Page 142 of the Sustainability Appraisal refresh should be amended to reflect this on both Options 1 and 2 for Bordesley Park as well as Option 3 and Option 5 being amended to read 'To a small | No change.<br><br>Amend The matrix on Page 142 of the Sustainability Appraisal refresh (Consultation 27 March - 8 May 2009). Option 1 and 2 should be 'Yes' and Option 3 and 5 should be 'To a small extent'. |

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| | | Provision of local services and facilities - Only Bordesley Park and Foxlydiate Woods are deemed to achieve this. Webheath ADR proposals include a local centre, doctors and/or dental surgery.<br><br>Accessibility by public transport - Refer to accessibility strategy submitted with representation. There is existing and proposed public transport provision to enhance provision for existing Webheath residents also.<br><br>Safeguard and strengthen landscape - Bordesley Park secures a positive rating here and Webheath ADR negative despite Bordesley being in the Green Belt adjoining an Area of Great Landscape Value and Landscape protection area. Webheath ADR has no landscape designations. | extent' because of the location of the Brockhill ADR.<br><br>This judgement is based on the proximity of existing facilities that could be enhanced as well as potential for further provision. In addition, developing on all smaller sites will result in fewer opportunities to provide local services and facilities.<br><br>Judgement based upon the conclusion that development closest to the town centre offers the maximum potential to improve and integrate public transport links.<br><br>Judgement has been based upon WYG assessment of landscape value as set out in WYG Stage II report. | No change.<br><br>No change.<br><br>No change. |

## *Sustainable Developments Strategy*

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Policy SC.1 – Housing Provision | 005/484 (William Davis Ltd) | Recognises the importance of providing lifetime homes in the future but does not consider it necessary to establish such a requirement in advance of 2013 (National Guidance – Lifetime Homes: Lifetime Neighbourhoods). Objection to final paragraph of Policy SC.1 which looks to introduce a Lifetime Homes Standard on adoption of the Core Strategy which is likely to be in advance of 2013 | Officers acknowledge that the requirement for lifetime homes is not expected in advance of 2013. However, para 20 of 'Lifetime Homes: Lifetime Neighbourhoods' states that voluntary take-up of the concept by the building industry would be encouraged/ supported with a review of take-up in 2010 to assess matched market needs/ expectations. Chapter 7: Lifetime Homes (summary panel) states that all public sector funded housing should be built to Lifetime Homes Standards by 2011, which is when the Core Strategy is anticipated for adoption. | Alter final paragraph of Policy SC.1 to encourage voluntary private sector take-up of the lifetime homes concept prior to its mandatory status in 2013. Encourage RSLs to build to Lifetime Homes Standards from adoption of the CS |
| Policy SC.2 – Efficient Use of Land | 005/485 (William Davis Ltd) | Objection to criteria (ii) of Policy SC.2. Consider that the densities are too high and would limit the quality and type of housing delivered. Any | Officers consider that the density levels in Policy SC.2 are specific to the Redditch local area as they carry forward achieved density levels from | None |

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| | | density requirement above 35dph is unlikely to be achieved without a high proportion of flats which would not reflect market demands. Housing density requirement should be flexible on a site by site basis to allow for consideration of local trends and character. Flexibility would allow for higher quality developments and reduce the need for flats in a limited market | the Borough of Redditch Local Plan No.3 and encourage higher density levels on sites within and adjacent to the Borough's Town and District centres. Further to this, criteria iii of the policy also makes provision for density flexibility. The policy is therefore considered to be in conformity with the WMRSS Policy CF6 – Making efficient use of land | |
| Policy SC.3 – Affordable Housing | 005/486 (William Davis Ltd) | Objection to the 40% affordable housing requirement for residential development in criteria (i) of Policy SC.3 with respect to:<br>1. Requirement is far too high and contrary to national planning policy<br>2. A 40% requirement will be extremely constraining on residential development and render a significant proportion of potential | 1, 2 & 3. 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). Paragraph 29 of PPS3 – Housing states that LPAs should set an overall (i.e. plan-wide) target for the amount of affordable housing to be provided… taking into account | 1, 2 & 3. Officers to investigate the viability of alternative affordable housing provision including a sliding scale of financial contributions and lower levels of on-site provision should a threshold of 40% prove too constraining |

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| Policy SC.3 – Affordable Housing | 005/486 (William Davis Ltd) | residential developments unviable and undeliverable<br>3. This will in turn endanger the ability of the council to deliver regional targets and is particularly relevant in the current economic climate where viability of sites is particularly vulnerable. Even modest requirements are unviable in the current economic climate and this will be the case for the demanding requirements of Policy SC.3<br>4. PPS3, para 29 indicates that LPAs will need to undertake an informed assessment of economic viability of any thresholds and proportions of affordable housing and their likely impact on levels of housing delivery. Unaware of any affordable housing viability assessment being carried out to support Policy | information from the Strategic Housing market Assessment. The 40% affordable housing provision is also a threshold which has been established in adopted SPD (January 2008). Prior to revising the SPD, previous SPG (March 2004) expected a provision of *'at least 39% (para 6.3),* based upon findings in the Housing Needs Assessment (December 2003). Officers consider that this is a well established and relatively consistent threshold for Redditch based in the findings of successive studies. However, officers consider that should the 40% threshold prove unviable, investigation of a sliding scale of financial contributions coupled with lower levels of on-site provision may provide a more viable option<br><br>4 & 5. Noted and agreed | |

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| | | SC.3 and consequently, Policy SC.3 is contrary to national policy<br>5. The Council should undertake a viability assessment as stipulated by national policy and any future requirements are guided by the results of the assessment | | 4 & 5. The Council will undertake a local level Housing |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| | | | | Market Assessment which will include the economic viability assessment regarding affordable housing |
| Policy SC.1 – Housing Provision | 017/248 (CPRE) | 1. Consider PDL as being the first option for new development | 1. Policy SP.2 – Development Strategy addresses this point | 1. None |
| | | 2. There should be a specific policy relating to the protection of back gardens | 2. This issue is addressed in BORLP3 Policy B(HSG).6 – Development within or adjacent to the Curtilage of an Existing Dwelling. This policy has been saved indefinitely until such time that it is replaced/ superseded and should therefore be relied upon when proposed development in these circumstances arises | 2. None |
| Policy SP.1 – | 021/072 | Policy accords with emerging | Noted | None |

| Policy/ Issue/ Para/ Doc | Respondent No./ Representation No. | Summary of comment | Council's response | Council's proposed action |
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| Settlement Hierarchy | (WMRA) | WMRSS Policy CF2 (Housing beyond the Major Urban Areas) and also the published WMRSS version of this policy | | |
| Policy BE.7 – Exceptions Housing at Astwood Bank and Feckenham | 021/082 (WMRA) | Policy accords with emerging WMRSS Policy CF7C (Delivering Affordable Housing) | Noted | None |
| Policy SC.1 – Housing Provision | 021/093 (WMRA) | Policy is contrary to emerging WMRSS Policy CF3 (Level and Distribution of New Housing Development) and part e of the footnotes to the policy. Policy SC.1 proposes to make provision for 2243 dwellings up to 2026 which is 1057 short of the Borough's required housing provision set out in Policy CF3. If pursued, the CS would be out of conformity with the emerging WMRSS Phase 2 Revision | It is evidenced in previous planning documentation relating to the Borough of Redditch Local Plans 2 & 3 that the three ADRs had potential for development. It should be noted that during previous plan preparation, officers were restricted to searching for appropriate and suitable land for development within the Borough's administrative boundary only. The three ADRs offered the most appropriate locations for development at that time. Changes to the planning | Consider future use of ADRs and other options to meet the revised EiP Panel recommendation for the housing target of 4000 dwellings within Redditch Borough<br><br>Update Key Diagram to show the broad location of the SUE boundary to be determined in collaboration with Bromsgrove District Council |

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| | | | system have allowed for cross-boundary investigation for sustainable locations for Redditch related development. WYG1 dismissed Redditch's rural south west as unsuitable for development and WYG2 concluded that land beyond the Borough Boundary offered more sustainable locations for development than the three ADRs.<br><br>Following receipt of the EiP Panel Report, the Bordesley Park identification in the WYG 2 Report was regarded as too inflexible to deliver Redditch related growth in Bromsgrove District and greater flexibility in terms of achieving and maintaining housing output could be provided through parallel pursuit of a number of development options. The Panel recommended that land for 4000 dwellings should be | |

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| | | | identified within the Borough boundary. As such, joint consultation between Redditch Borough and Bromsgrove District Councils will take place early in 2010 to consider development options for Redditch related growth and the contribution of other sites, including the ADRs within Redditch Borough | |
| Policy SC.3 – Affordable Housing | 021/095 (WMRA) | Policy accords with emerging WMRSS Policy CF7 (Delivering Affordable Housing) | Noted | None |
| Policy SC.3 – Affordable Housing | 028/107 (GOWM) | Support for addressing issue of housing affordability | Noted | None |
| Policy SP.1 – Settlement Hierarchy | 029/704 (Tetlow King) | 1. Object to policy as it fails to take account of local needs in rural areas throughout Redditch Borough. Policy should make clear reference to the need for 100% affordable housing developments on rural exception sites where local need is demonstrated. This | 1. Officers consider that with respect to the settlement hierarchy, Redditch Borough only has three distinctively sized settlements to which this policy applies, two of which are within Redditch's rural area. BORLP3 Policy B(RA).10 makes reference to exception housing in rural settlements | 1. Include reference in the Settlements Strategy preamble to rural exceptions sites providing 100% affordable housing |

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| | | | should be taken into account within the Settlement Hierarchy | being for 100% affordable uses. This policy has been retained, however, officers consider that some reference to 100% affordable uses on exceptions housing sites could be made in the Settlements Strategy preamble | |
| Policy SP.2 – Development Strategy | 029/705 (Tetlow King) | *2.* | Object to the rigid phasing of policy as it fails to take into account the current economic circumstances and the difficulty of bringing forward sites in a strictly phased manner. Suggested alteration to policy wording: *"In exceptional circumstances, <u>where there exists a clear development need</u> and when the options for locating development set out above <u>cannot be achieved</u>, consideration of locations adjacent to the Redditch urban area on land currently designated as Green belt <u>will be</u>* | 2. Officers consider that the policy is in conformity with the emerging WMRSS Policy CF4 – Phasing of new development. The Council's five year housing land supply document will inform whether there is a sufficient supply of brownfield land available to meet the trajectory and whether greenfield sites need to be made available<br><br>With respect to the suggested policy wording to consider development on Green Belt land, officers consider that the Green Belt boundaries will be rolled back to accommodate | 2. Consider wording of Policy SP.2 to allow for development to come forward on sites currently designated as Green Belt in a manner which will not be to the detriment of development in the urban area on brownfield and greenfield sites |

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| | | *acceptable."* | the level of development allocated for Redditch's growth needs prior to CS submission. Therefore, development on Green Belt land will not be an issue in the CS once adopted<br><br>Officers recognise 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 but not necessarily the respondents suggested wording | |
| Policy SP.6 – Woodrow Strategic Site | 029/707 (Tetlow King) | 3. Support for policy. Demonstrates Council's commitment to providing high quality affordable housing of an appropriate | 3. Noted | 3. None |

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| | | mix to meet local needs | | |
| Policy BE.7 – Exceptions Housing at Astwood Bank and Feckenham | 029/709 (Tetlow King) | 4. Support for policy. Recommend that 'local need' is qualified through use of a clear set of potential need parameters. List should not be exhaustive but provide a clear indication by which local need may be assessed externally | 4. Officers consider that some clarification of 'local need' could be made in the Settlements Strategy preamble | 4. Include reference in the Settlements Strategy preamble to clarification of 'local need' |
| | | 5. Statement that settlement boundaries will not be revised to accommodate affordable housing developments should be removed as it is restrictive | 5. Officers disagree that reference to settlement boundaries not being revised to accommodate affordable housing is restrictive. The RJ clearly states that exceptions housing will be considered beyond settlement boundaries and does not necessitate boundary reviews | 5. None |
| Policy SC.1 – Housing Provision | 029/711 (Tetlow King) | 6. Exact figure relating to housing provision should be removed as it is subject to | 6. Core Strategy will reflect the appropriate target at the time of its submission but it would not | 6. Alter housing provision target in the CS to reflect that in the WMRSS prior to |

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| | | further approval and change following WMRSS EiP. Opening sentence should instead make reference to sufficient provision being made to meet local needs and demand in line with PPS3 and RSS figures when published | be necessary to remove reference to the requirements | submission |
| | | 7. Advise that CS provide an indicative tenure split for affordable housing. WMRSS Policy CF7 indicates that separate targets should set for social-rented and intermediate housing to ensure that these are in broad accordance with the findings of an up-to-date SHMA | 7. Officers consider that there is no need to indicate a tenure split for affordable housing in the policy. Reliance should be had to the SHMA which is updated periodically throughout the plan period. Any specified tenure split in policy may not reflect the needs of the Borough as the SHMA is updated | 7. None |

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| Policy SC.2 – Efficient Use of Land | 029/712 (Tetlow King) | 8. Support for policy. Target figure for housing development on PDL reflects a realistic housing strategy and takes account of economic viability. This figure should be retained as a target | 8. Agreed and noted | 8. None |
| Policy SC.3 – Affordable Housing | 029/713 (Tetlow King) | 9. Justification should be made for the minima target of 141 affordable dwellings per annum to improve clarity in the policy. Supports the intention to review this figure when new evidence indicates this is appropriate. Support remainder of policy. Recommend regular monitoring and review of Housing Needs Assessment | 9. Officers are aware that this figure may alter upon publication of the WMRSS Phase 2 Revision and will clarify the point when revised housing requirements have been set for Redditch growth. Aspects of the HNA have been superseded by SHMA which is reviewed annually throughout the plan period. Policy should be sufficiently flexible to reflect the findings of the most up to date SHMA | 9. Revise affordable housing figure if appropriate when WMRSS Phase 2 Revision publishes revised housing figures. Policy should be sufficiently flexible to reflect the findings of the most up to date SHMA<br><br>The Council will undertake a local level Housing Market Assessment which will include the economic viability assessment regarding affordable housing |
| Strategy | 029/717 (Tetlow King) | 10. Consider that the following be addressed in the CS: | 10. Officers consider that CS policies address these points and continued work to fine-tune | 10. Ongoing policy development prior to |

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| | | i. Affordable housing be given sufficient weight and status<br>ii. Full range of special needs housing including provision of lifetime homes and appropriate provision for the elderly<br>iii. Flexibility regarding design and development control standards, densities etc to assist in achieving affordable housing<br>iv. Provision of affordable housing should be viewed within the context of achieving balanced communities and within the wider social exclusion and housing plus agendas<br>v. Recognition should be given to the advantage of working with RSLs and a suitably flexible approach should be adopted towards | policies for CS submission will serve to enhance these issues | submission |

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| | | S106 agreements<br>vi. Include policies that maximise the reuse of empty properties for affordable housing | | |

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| Policy BE.7 – Exceptions Housing at Astwood Bank and Feckenham | 049/744 (WCC) | 1. Policy would be better placed within the Housing section of 'Stronger Communities' rather than with the environmental policies | 1. The layout and headings of the CS will be changed prior to submission and policies will be moved to appropriate locations under the new strategy headings | 1. None |
| | | 2. Policy should explicitly refer to affordable housing in the title and first paragraph | 2. Noted | 2. Consider more prominent reference to affordable housing within the policy title |
| | | 3. First para of RJ could be made clearer by explaining that the exceptions policy allows for affordable housing to be provided on small sites that would not normally be used for housing | 3. Due to a revised layout of the CS, RJs will cease to exist and will be replaced with introductory text which will encompass the purpose of the individual strategies. Officers consider that reference to exceptions housing being provided on sites not normally used for housing could be incorporated in the new Strategy pre-amble | 3. Ensure all issues are covered in the new strategy introductions. Include reference to exceptions housing being provided on sites not normally used for housing could be incorporated in the new Strategy pre-amble |
| | | 4. RJ states that housing will be required to remain affordable in perpetuity but this may be better included in policy | 4. Noted. Policies may be expanded as text is removed from deleted RJs | 4. Ongoing policy development for new CS structure following commissioning of Redditch Housing Market Assessment |

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| Policy SC.1 – Housing Provision | 049/756 (WCC) | 1. Due to reliance on the findings of WYG2, the PDCS does not make sufficient provision within Redditch for the level of housing growth required by WMRSS Preferred Option<br>2. Whilst the PDCS makes reference to adjoining authorities making up the shortfall in allocation, neither of the draft CS for Bromsgrove or Stratford on Avon Districts make provision to meet this shortfall<br>3. The level of growth to be accommodated within Redditch may alter as a consequence of the WMRSS EiP<br>4. RBC needs to be aware that a significant under provision in the housing allocation is not in conformity with WMRSS Phase 2 Revision | 1, 2, 3, 4 & 5. See 021/093 above | 1, 2, 3, 4 & 5. See 021/093 above |

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| Policy SC.1 – Housing Provision | 049/756 (WCC) | 5. Final submission will need to consider and respond to any future recommendations that emerge from the EiP Panel which may affect the level of housing growth to be accommodated within Redditch Borough<br>6. Unclear what proportion of homes would be expected to comply with the Lifetime Home Standard. Pg 92 states *'a proportion of homes'* whilst Policy SC.1 states *'all new residential development'.* This issue should be clarified | 5. Noted. See 1 above<br>6. Noted. Officers acknowledge that the requirement for lifetime homes is not expected in advance of 2013. However, para 20 of 'Lifetime Homes: Lifetime Neighbourhoods' states that voluntary take-up of the concept by the building industry would be encouraged/ supported with a review of take-up in 2010 to assess matched market needs/ expectations. Chapter 7: Lifetime Homes (summary | 6. Clarify the proportion of lifetimes homes provision in policy. Alter final paragraph of Policy SC.1 to encourage voluntary private sector take-up of the lifetime homes concept prior to its mandatory status in 2013. Encourage RSLs to build to Lifetime Homes Standards from adoption of the CS |

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| | | | panel) states that all public sector funded housing should be built to Lifetime Homes Standards by 2011 | |
| Policy SC.3 – Affordable Housing | 049/757 (WCC) | 1. Policy does not recognise or address particular difficulties in delivering affordable housing within smaller settlements such as Feckenham or rural areas. More explicit guidance should be given in the policy itself with respect to lower thresholds/ 100% affordable housing sites (WMRSS CF7) and RBC's Affordable Housing SPD | 1. Officers consider that under the revised structure for the CS, there may be an opportunity to combine or more closely align the affordable housing policy and the rural exceptions policy | 1. Investigate the option of more closely aligned or merged policies for affordable housing |
| Policy SP.1 – Settlement Hierarchy | 085/522a & b (Turley Associates) | 1. Supports categorisation of Redditch at the top of the settlement hierarchy as the 'Main settlement'.<br>2. Agrees that Redditch is the key service centre for the Borough.<br>3. CS should recognise the important contribution the | 1. Noted<br>2. Noted | 1. None<br>2. None |

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| | | Kingfisher Shopping Centre can make to enhancing Redditch's ability to function as the main settlement | 3. Not relevant within Policy SP.1. This issue is covered in the Spatial Portrait. | 3. Consider amendment to Spatial Portrait to reflect the important contribution the Kingfisher Shopping Centre can make to enhancing Redditch's ability to function as the main settlement |

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| Stronger Communities | 085/528 (Turley Associates) | 4. In order to strengthen Redditch's role as the main settlement, the CS should seek to direct the development of additional housing to suitable and available sites within the Town Centre which will enhance its vitality and viability, and to the urban area | 4. There are sites within the town centre which may be suitable for a mix of uses. At this point in time, they do not specifically appear in the SHLAA until the mix of development has been determined and the approximate provision remaining which may have housing potential has been established. At that point in time, such sites will be included in the SHLAA with a provisional density appropriate with development in a town centre location | 4. None |
| | | 5. In locating new housing development, consideration should be given to the desirability of promoting sustainable development and connectivity to the town centre to encourage the use of existing shopping facilities and enhance their long-term viability | 5. The identification of SHLAA sites takes into consideration sustainability issues such as access to services and distances to retail and health facilities et al. Although the SHLAA sites are not ranked, their location to such facilities can be scrutinised in the SHLAA. The majority of SHLAA sites in the urban area are within a reasonable walking distance of local retail facilities | 5. None |

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| Policy SP.1 – Settlement Hierarchy | 088/532 (Natural England) | Settlement hierarchy seems appropriate but reiterates the following points:<br>1. The most sustainable location may not always be the settlement with the most existing services – sustainability goes beyond this<br>2. Each location should be judged on its merits with decisions informed by a robust evidence base | 1. & 2. The Settlement Hierarchy was duly considered in the CS Sustainability Appraisal (pp. 112-113)<br><br>The Accessibility Study justifies the Settlement Hierarchy set out in the CS and identifies which settlements in the Borough are the most sustainable. It concludes that Redditch as a town, is considered to be the most sustainable of all the settlements in the Borough, Astwood Bank is considered to be a sustainable rural settlement and Feckenham is classified as an unsustainable rural settlement | 1. & 2. None |
| Policy SC.1 – Housing Provision | 088/556 (Natural England) | 1. Mostly this policy seems appropriate however a blanket requirement for all new developments to comply with Lifetime Homes Standards may be excessive – particularly for | 1. Lifetime Homes, Lifetime Neighbourhoods (2008, p.90) states that all public sector funded housing should be built to Lifetime Homes Standards from 2011. Furthermore, it aspires to build all new homes | 1 & 2. Clarify the proportion of lifetimes homes provision in policy |

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| | | flats<br>2. Elsewhere in the County, a proportion of homes meeting Lifetime Homes Standards has been required | to Lifetime Homes Standards by 2013. There is no caveat in the document for certain types of properties i.e. flats, to be excluded from meeting the Lifetime Homes Standards | |

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| Policy SC.2 – Efficient Use of Land | 088/557 (Natural England) | 1. Policy places onus on developer to prove that lower than required densities would result in detrimental impacts. Reality is that majority of developers would wish to build as many units as possible to maximise profits | 1. Officers consider that developers should provide justification if proposals fall short of density requirements. Past trends show that some proposals attempt to come in under the density requirements in order to avoid the provision of affordable housing units. This policy criteria affords some protection to the affordable housing provision allocated to the Borough if sites should be contributing to meeting this provision | 1. None |
| Policy SC.2 – Efficient Use of Land | 088/557 (Natural England) | 2. Suggest a change of policy emphasis in order to protect brownfield/marginal land which has value for amenity, character and | 2. Sites which fall into these categories may have already been dismissed from inclusion in the SHLAA. However, gardens have not been subject | 2. Include in Policy, text relating to consideration of other functions outweighing the need for development for brownfield sites which may |

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| | | environmental quality of an area. Council should identify brownfield land and gardens which have value in terms of biodiversity interests, their function as a wildlife corridor, landscape and townscape amenity and formal and informal recreation. These should be protected from inappropriate development and proposed lower, more suitable densities as appropriate | to SHLAA scrutiny due to threshold sizes. If land proposed for development has not been the subject of SHLAA scrutiny, it is anticipated that consideration of other functions outweighing the need for development would form part of the development control process | have value in terms of biodiversity interests, their function as a wildlife corridor, landscape and townscape amenity and formal and informal recreation in preference to development |
| | | 3. Support the promotion of higher densities in locations close to public transport interchanges | 3. Noted | 3. None |

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| Policy SP.1 – Settlement Hierarchy | 091/129 (Atisreal) | Proposed settlement hierarchy is welcomed and officers comments that a large number of development sites would not be a sustainable approach is endorsed | Noted | None |
| Policy SC.2 – Efficient Use of Land | 093/ 501 (Environment Agency) | Density of housing development on PDL will be subject to environmental infrastructure/ constraints. E.g. the regeneration of some brownfield sites may be more suitable to a commercial/ less vulnerable use if there were flood risk constraints or to lower levels of housing density to achieve flood risk betterment | Noted. Officers consider that if alternative uses to housing or lower density housing may be more suitable on PDL sites in residential areas, then justification for this would be required as part of any planning application. Preferred Draft Core Strategy Policy SC.2 Criterion iii provides the policy detail for this consideration. The type of development proposed on any land, whether PDL or not, would be judged on its appropriateness within its surroundings during the planning application process | None |
| Housing | 103/160 (Anderson) | 1. Actual Redditch population not growing at rate in | 1. The need for new dwellings does not solely come from | 1. None |

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| | | predicted population projections despite some 3000 new dwellings (over the last 10 years) | population growth. Other trends such as divorcing couples, children growing up and leaving home, amongst others, all contribute to the increased demand for housing | |
| | | 2. Change in housing stock in projection is important. Greatest increase is in single person dwellings. Historically, New Town development concentrated on family homes. As population has aged, these family homes are becoming more under-occupied and are considered to house retired couples or single people. The need to increase densities in new development adds to the problem of larger families living in more cramped | 2. Under-occupation may be an issue that can be resolved for Council rented properties through suitable property exchange mechanisms but this is not an issue that can be tackled in the private housing market | 2. None |

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| | | conditions | | |
| | | 3. Encouraging the population to settle in new SUE's will add to the cost of providing schooling. Each community will only need significant school provision for first twenty five years as demand will fall due to people remaining in their homes and offspring forming new families in other parts of the town. Waste of resources as schools close | 3. The Worcestershire County Council's Infrastructure Report, identifies all infrastructure requirements needed to achieve the allocations set out in the WMRSS to 2026. School provision has been assessed and it has been identified that 2 primary schools will be needed to serve additional development in Redditch despite steps to reduce the high level of surplus spaces in all three tiers of the education system (p.80) | 3. None |

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| Housing | 103/160 (Anderson) | 4. New building should be concentrated on the needs of the older population, reflecting modern aspirations (separate living and sleeping rooms and communal assembly rooms). Large communities supported by a resident warden will attract sufficient numbers of the population to free up larger dwellings for families to meet predicted demand. Such communities could easily be developed at higher densities, reducing the demand on Green Belt land. Such 'super communities' should be | 4. New dwellings will take into consideration the 'Lifetime Homes' Strategy. Redditch Borough Council's draft Strategy for the Housing and Support of Older People acknowledges that retirement villages can contribute to the range of housing and are options available to our aging population, However, the Strategy does not identify a specific need for this type of accommodation. The SHMA identifies what types of residential properties are needed in Redditch and applications for 'super community' type development would be considered via the | 4. None at this stage. Revisit this issue during Site Allocations DPD preparation |

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| | | identified and designated as strategic sites before selecting sites to meet the balance of needs | planning application process on their individual merits. If additional work on the emerging Older Persons Strategy identifies a specific need/amount of accommodation which is demonstrated to need to be met through a specifically identified retirement village, it would be possible to include appropriate site allocation at a later date during the Site Allocations DPD preparation | |
| Housing | 103/164d (Anderson) | 5. Requirement to improve access to services for all must recognise Govt's requirements for supporting people in their homes for as long as possible and the steadily aging population | 5 & 6. See response to 4 above | 5 & 6. See 4 above |
| | | 6. Much of the increase in single status is due to marriage break-up and the loss of a partner. The DPD needs to recognise this and concentrate on its | 6 & 7. Reliance should be had | 6 & 7. None |

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| | | implications rather than continue to build 3 & 4 bedroomed houses. Under occupancy leads to poor use of materials and resources and an increased use of services. Building super centres is one solution, but other actions should be planned, such as designating special facilities for the support and social inclusion of the older members of society | to the SHMA and the HNA which are updated periodically throughout the plan period. Any specified housing size/type preference in policy may not reflect the needs of the Borough as the SHMA is updated as the Plan period progresses | |
| | | 7. The most sustainable objective should be to measure the type and quantity of dwellings needed by the population, and match supply to demand | | |
| Policy SP.1 – Settlement Hierarchy | 104/050 (RPS) | Support for Redditch as the principle settlement within the CS settlement hierarchy | Noted | None |
| Policy SP.2 – Development | 104/051 (RPS) | 1. Supports the approach to facilitate early delivery of housing through strategic | 1. Officers agree that the level of development likely to be required on land currently | 1. Consult on revised policy wording early 2010 |

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| Strategy | | sites. Correct to identify that general priority is for brownfield land over greenfield land, however it should not wait until locations have been exhausted before accepting proposals on Green Belt land | 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 | |
| | | 2. Should not prioritise brownfield land over greenfield land where it may exist in unsustainable locations | 2. Officers consider that brownfield sites within settlements are in sustainable locations given the nature of Redditch Borough | 2. None |
| | | 3. Ensure that there is a continuous supply of housing in accordance with PPS3 and plan proactively for the delivery of housing in the most appropriate locations | 3. The Council's five year housing land supply document will inform whether there is a sufficient supply to meet the trajectory. PPS3 stresses that LPAs should set out a housing implementation strategy to deal with the managed delivery of housing. Work with relevant | 3. Work to commence on Implementation Strategy with key stakeholders autumn 2009 |

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| | | | stakeholders will begin on this in autumn 2009 | |
| Policy SC.3 – Affordable Housing | 104/065 (RPS) | 1. RBC has presented no evidence that a target of 40% affordable housing is viable and been tested against risk to housing delivery through a housing trajectory as required in PPS3 para 29.1 | 1. 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'. Officers consider that this policy is conformity with both PPS3 and WMRSS Policy CF7 – Delivering affordable housing<br><br>Officers consider that the SHMA does not deliver housing requirements at a significantly local level. The 40% target needs to be tested for viability and whether additional contributions for affordable units should be sought on smaller sites | 1. Commission Redditch HMA as supporting evidence for policy development |
| | | 2. Not clear how RBC is | | |

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| | | seeking 40% affordable housing from a housing provision that is substantially lower than WMRSS requirements, further exacerbating the viability of delivery. Policy SC.1 sets out a requirement of 2243 dwellings to be delivered 2006-2026 which equate to 112 dpa. Policy SC.3 states that target for affordable housing provision is 141 dpa, some 29 dwellings higher than current annual provision rate. Therefore policy is unsound. RBC should undertake viability appraisal of affordable housing targets<br><br>3. RBC should plan proactively with Bromsgrove DC for a North West Urban Extension, in a manner in which such a development could provide comprehensive | 2. Following receipt of the EiP Panel Report, the Bordesley Park identification in the WYG 2 Report was regarded as too inflexible to deliver Redditch related growth in Bromsgrove District and greater flexibility in terms of achieving and maintaining housing output could be provided through parallel pursuit of a number of development options. The Panel recommended that land for 4000 dwellings should be identified within the Borough boundary. As such, joint consultation between Redditch Borough and Bromsgrove District Councils will take place early in 2010 to consider cross-boundary locations for Redditch related growth and the contribution of other sites, including the ADRs within Redditch Borough<br><br>3. See 021/093 above | 2. Officers to consider capacities available within the ADRs and Green Belt to meet the revised RSS target of around 4000 dwellings up to 2026 and undertake a further consultation period<br><br>Update Key Diagram to show the broad location of a SUE/SUEs boundary to be determined in collaboration with Bromsgrove District Council |

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| | | development solutions to issues such as affordable housing that is realistically nearer its targets | | |
| | | 4. Policy should also make provision for flexibility where such requirements results in a scheme being unviable and threatens deliverability | 4. Should the 40% threshold prove unviable, criteria ii offers flexibility for meeting the affordable housing provision. Officers consider that this policy is conformity with both PPS3 and WMRSS Policy CF7 – Delivering affordable housing | 3. See 021/093 above |
| | | | Officers consider that the SHMA does not deliver housing requirements at a significantly local level. The 40% target needs to be tested for viability and whether additional contributions for affordable units should be sought on smaller sites | 4. Commission Redditch HMA as supporting evidence for policy development |
| | 109/172 | People need housing, especially social housing and | Noted | None |

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| | (Wareing) | affordable housing to purchase. Local government funds from the sale of council houses should be utilised to house people | | |
| | 153/514 (Centro) | 1. Development should be focussed in areas that are well served by public transport as outlined in WMRSS Policy T2 | 1. Noted | 1. None |
| | | 2. A travel plan should be produced for new developments to promote sustainable transport to and from the development | 2. Noted. With respect to the large areas of development likely to come forward to meet the growth needs of Redditch, a travel plan would form a part of a comprehensive planning application submission. Although not specifically referred to in a specific Core Strategy policy, travel plans are referenced in appropriate Core Strategy Strategic Site policies. | 2. None |
| Policy BE.7 – Exceptions Housing at Astwood | 202/332 (Tetlow King) | Support for policy. Recommend that 'local need' is qualified through use of a clear set of potential need | Officers acknowledge that there are much smaller 'settlements' within Redditch's rural area, beyond existing | Include reference to local needs housing in rural locations beyond the village boundaries of Astwood Bank |

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| Bank and Feckenham | | parameters. List should not be exhaustive but provide a clear indication by which local need may be assessed externally. Statement that settlement boundaries will not be revised to accommodate affordable housing developments should be removed as it is restrictive | settlement boundaries; such as Ham Green and Elcocks Brook. In order not to overlook local needs housing provision in such small 'settlements', it is considered that some reference to local needs housing in rural areas beyond the confines of Feckenham and Astwood Bank is needed in this policy. See same comments for rep 029 | and Feckenham |
| Policy SC.1 – Housing Provision | 202/333 (Tetlow King) | Object to policy as it grossly under provides for the WMRSS draft target of 3300 dwellings to be provided in the Borough | See 021/093 above | See 021/093 above |
| Policy SC.3 – Affordable Housing | 202/337 (Tetlow King) | Explanation should make it clear that the 141 affordable dwellings per annum is derived from the Strategic Housing Market Area Assessment. Supports the intention to review this figure when new evidence indicates this is appropriate. Recommend regular monitoring and review of Housing Needs Assessment | Officers are aware that this figure may alter upon publication of the WMRSS Phase 2 Revision and will clarify the point when revised housing allocations have been set for Redditch growth. HNA has been superseded by SHMA which is reviewed annually throughout the plan period. Policy should be | Revise affordable housing figure if appropriate when WMRSS Phase 2 Revision publishes revised housing figures. Policy should be sufficiently flexible to reflect the findings of the most up to date SHMA |

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| | | | sufficiently flexible to reflect the findings of the most up to date SHMA. See comments to 029/713(9) | |
| Strategy | 202/338 (Tetlow King) | Consider that the following be addressed in the CS:<br>1. Affordable housing be given sufficient weight and status | 1. Affordable housing needs are addressed through policy and reference is made in policy that affordable housing should reflect the most up to date SHMA. Officers consider that this gives sufficient weight and status to affordable housing needs within the Borough | 1. None |
| | | 2. Full range of special needs housing including provision of lifetime homes and appropriate provision for the elderly | 2. Policy SC.1 – Housing Provision makes specific reference to the provision of dwellings to Lifetime Homes Standards. In addition to this, Redditch Borough Council's draft Strategy for the Housing and Support of Older People acknowledges the range of housing provision which is available to our aging population. However, the Strategy does not identify a | 2. If additional work on the emerging Older Persons Strategy and/or the SHMA identifies a specific need/amount of accommodation which is demonstrated to need to be |

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| | | | specific need for this type of new accommodation. The SHMA does not identify a specific quantity of dwellings needed over the plan period to meet the needs of our aging population | met specifically through new development, it would be possible to include an appropriate site allocation at a later date during the Site Allocations DPD preparation |
| | | 3. Flexibility regarding design and development control standards, densities etc to assist in achieving affordable housing | 3. Officers are reluctant to accept that there should be a compromise when it comes to design; there are national standards for design of affordable housing (housing corp) and lowering / altering these standards wouldn't be necessary at the local level | 3. None |
| | | 4. Provision of affordable housing should be viewed within the context of achieving balanced communities and within the wider social exclusion and housing plus agendas | 4. Officers consider that the CS policy does indeed consider the need for affordable housing provision in the context of balanced communities. The Policy is further supported by adopted SPD | |
| | | 5. Recognition should be given to the advantage of working with RSLs and a | | |

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| | | suitably flexible approach should be adopted towards S106 agreements | 5. RSLs have been to meetings on delivery. 106 agreements including those appropriate to affordable housing will be reviewed | |
| | | 6. Include policies that maximise the reuse of empty properties for affordable housing | | 4. None |
| | | | 6. Officers have little control over reuse of empty properties within the private sector. However, with respect to empty public sector properties, the Council has a good turn around record for re-letting these properties. Officers consider that whilst some district authorities may have a burdening empty homes issue, this is not the case in Redditch and does not justify inclusion in policy | 5. Continue working closely with RSLs. Review of 106 agreements re: affordable housing provision be incorporated as appropriate in SPD revisions |

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| | | | | 6. None |
| Policy SP.1 – Settlement Hierarchy | 262/405 (HCA) | Support for this policy and acknowledgement that Redditch is the largest settlement in the Borough | Noted | None |
| Policy SC.1 – Housing Provision | 262/411 (HCA) | 1. Support for Council's objective to ensure new housing meets needs identified in Strategic Housing Area Assessment | 1. Noted | 1. None |
| | | 2. Welcomes the proposals to ensure new dwellings comply with Lifetime Home | 2. Noted | 2. None |

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| | | Standards | | |
| | | 3. Concerns that policy proposes significantly fewer dwellings in the Redditch urban area that the current WMRSS Preferred option target of 3300 | 3. See 021/093 above | 3. See 021/093 above |
| Policy SC.2 – Efficient Use of Land | 262/418 (HCA) | Support for this policy | Noted | None |
| Policy SC.3 – Affordable Housing | 262/419 (HCA) | Support for the deliverability of social and affordable housing | Noted | None |
| Policy SP.1 – Settlement Hierarchy | 263/433 (English Heritage) | Agree that the main focus for development should be Redditch given its role as the main service centre | Noted | None |
| Policy SP.1 – Settlement Hierarchy | 264/444 (CB Richard Ellis) | Support for Redditch as main settlement where development should be focussed | Noted | None |
| Policy SC.1 – Housing Provision | 264/452 (CB Richard Ellis) | Suggest policy amended to include the preference of the re-use of sustainably located brownfield land within the urban area for residential use | Policy SP.2 – Development Strategy, deals with the phasing of land to come forward for development | None |

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| | | over and above the use of greenfield land | | |
| Policy SC.2 – Efficient Use of Land | 264/453 (CB Richard Ellis) | 1. Support the efficient use of land and criterion (i) which priorities reuse and regeneration of PDL<br>2. Use of targets for PDL reuse is encouraged<br>3. Target of 25% in Redditch could be increased in line with the Structure Plan which anticipated that the percentage of housing development on PDL would have risen to 50% by 2011<br>4. Policy should encourage the use of PDL in preference to greenfield land use<br>5. Densities included in criterion (ii) of between 30-50 dph should not imply a maximum density limit. | 1. Noted<br>2. Noted<br>3. 25% of development on PDL is realistic, based on the findings of the SHLAA. Officers will revisit this target when the Panel Report into the WMRSS Phase 2 Revision is available and a more definite set of housing figures is available to work with prior to CS submission<br>4. Policy SP.2 deals with this matter<br>5. Officers consider that the | 1. None<br>2. None<br>3. On receipt of Panel Report into WMRSS Phase 2 Revision, check targets are appropriate for Redditch<br>4. None |

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| | | Density should be assessed on a site by site basis | density levels in Policy SC.2 are specific to the Redditch local area as they carry forward achieved density levels from the Borough of Redditch Local Plan No.3 and encourage higher density levels on sites within and adjacent to the Borough's strategic shopping centres. The policy is therefore considered to be in conformity with the WMRSS Policy CF6 – Making efficient use of land. However, officers will give consideration to amending SC.2 criterion iii to state that higher densities than those in ii may be applicable for the same reasons as lower densities may be accepted | 5. Consider alteration to criterion iii of policy to allow for higher density levels if it can be demonstrated that there will be no detrimental impacts |
| Policy SC.3 – Affordable Housing | 264/454 CB Richard Ellis) | The level of affordable housing should be dependent on the individual site and the viability of the development scheme | 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'. Officers consider that | None |

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| | | | this policy is conformity with both PPS3 and WMRSS Policy CF7 – Delivering affordable housing. Refer to SC.2 criteria iii | |
| Policy SP.2 – Development Strategy & Policy SC.1 – Housing Provision | 267/574 (Barton Willmore) | 1. Development Strategy proposes delivery of only 2243 dwellings within Redditch which is 1057 short of the emerging requirement for the Borough | 1. See 021/093 above | 1 . See 021/093 above |
| | | 2. 2006 base projections increases the requirement for dwellings in Redditch to 8000. As a former New Town, Redditch should continue to fulfil such a function in the North Worcestershire area and as merited by its proposed status as SSD in the emerging WMRSS | 2. See 021/093 above | 2. See 021/093 above |
| | | 3. Development and investment should be directed towards the town | | |

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| | | 4. An increase in the number of dwellings to be provided within the Borough will ensure Redditch can meet its own local housing needs | 3. Policy SP.1 deals with this matter | 3. None |
| | | 5. Strategy is flawed and unsound. Strategy requires the agreement of the adjoining authority | 4. See 021/093 above | 4. See 021/093 above |
| | | 6. There are no significant environmental or physical constraints to the achievement of the WMRSS Preferred option figure of 3300 dwellings to be delivered within Redditch | 5. See 021/093 above | 5. See 021/093 above |
| | | 7. Disagree with the conclusions of WYG2 on the suitability of using safeguarded land to meet this target | 6 & 7. See 021/093 above | 6 & 7. See 021/093 above |
| Policy SC.3 – Affordable | 267/583 (Barton | 1. The requirement for 40% affordable housing | 1. & 2. See 104/065 above | 1. & 2. See 104/065 above |

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| Housing | Willmore) | provision should be expressed as a target percentage to ensure flexibility for those schemes where it is not financially viable to achieve 40% provision. Policy needs to include provision for the submission of financial viability information in such circumstances<br><br>2. Unaware of any evidence to demonstrate the extent to which the affordable housing target for the plan area and the site thresholds reflect an assessment of the economic viability of land for housing in the Borough. In the absence of such evidence, Policy SC.3 cannot be found sound | | |

## *Sustainable Transport*

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| Policy SC. 4 | 021/ 096 | Policy SC.4 accords with emerging WMRSS Policy SR2 part F and also adopted WMRSS Policies T2 and T3. | Noted. | None. |
| Policy SC. 5 | 021/ 097 | Policy SC.5 is in line with the emerging and adopted version of WMRSS Policy T9. | Noted. | None. |
| Transport | 024/ 113 | Accessibility and Transport should be continuously mentioned in the Core Strategy as this is an important issue. Redditch is an area where public transport should be encouraged. | Transport and Accessibility is considered as a key issue for the Core Strategy and will continue to be so in the Submission Core Strategy. | Ensure transport and accessibility is a key concern for the Submission Core Strategy. |
| Policy SC.4 | 027/477 | This Policy should be underpinned by a robust evidence base that demonstrates that the measures and improvements are deliverable.<br><br>Transport Assessments (as mentioned in the Reasoned | Agree, this will be detailed in the "Green" Technical Paper.<br><br>A sentence will be included within the Sustainable Travel and Accessibility Policy which | None.<br><br>Insert additional criteria into Sustainable Travel and Accessibility Policy which |

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| | | Justification) should be provided for all development proposals with significant transport implications. | requires Transport Assessments to be provided for significant developments. | states, *"Transport Assessments will be required for all development proposals with significant transport implications."* |
| Policy SC.5 | 027/478 | Road hierarchy as set out in this policy may assist in managing congestion, however care should be taken that this does not impact upon the ability of routes to accommodate pedestrians and cyclists safely and that routes continue to encourage these as primary modes of travel. | The principle of retaining the unique road hierarchy will be incorporated in the Sustainable Travel and Accessibility as an additional criterion. This policy promotes pedestrianisation and routes for cyclists. | Insert, as a sixth criterion to the Sustainable Travel and Accessibility' Policy the following text, *"The Borough Council will continue to endorse and pursue the principles of a structured road hierarchy and will seek to extend such principles in any proposal."* |
| | 049/ 726 | The Core Strategy Submission document should reference the Worcestershire Integrated Passenger Transport Strategy and sub-strategies. | The Worcestershire Integrated Passenger Transport Strategy (IPTS) has been considered when preparing the Core Strategy and it is considered that there would be no merit in directly referencing this document within the Submission Core Strategy. The IPTS will be incorporated into | None. |

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| | | | the 'Green Strategy' Technical Paper, as part of the background research informing the Transport Policy. | |
| Policy SC. 4 | 088/ 558 | Support Policy. Where possible, cycle and pedestrian links should be delivered within the context of green infrastructure. 'Green' links are likely to be more pleasant and are perceived as safer than routes along roads, and so likely to be used. | All opportunities to enhance green infrastructure would be promoted through the Natural Environment Policy. | None. |
| Transport | 098/ 141 | The document 'Vision for Alcester 2020' proposes the reopening of the railway between Alcester, Studley and Redditch to enable trains to operate from Alcester to Redditch and Birmingham. However, no provision has been made for the protection of a route for the railway for the reopening of stations in Studley and Alcester, in Warwickshire, | The 'Vision for Alcester 2020' is a document produced by Stratford–On–Avon District Council, their aims and aspirations can vary from those of neighbouring authorities. Communication with Stratford–On–Avon has confirmed there are no plans to progress this idea by Stratford–On–Avon as it is unfeasible to reopen the lines. | None. |

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| | | or possibly in the large built up area to the south of Redditch Station. The proposal is particularly relevant within the heavy traffic congestion on the A435 and as an alternative to a Studley by-pass. Redditch Borough Council should liaise with Stratford – On – Avon District Council and Warwickshire and Worcestershire County Council for the protection of a route for the railway, including possible sites for new stations. | | |
| Transport | 101/ 144 | Public transport should run on solar power, probably trams on the bus routes and no private cars within the tram transport area, walking and bicycles would be acceptable. | The source of power of public transport is too detailed for inclusion as an aspiration in the Core Strategy. With regard to trams on this bus routes, this is not possible in some parts of the older town of Redditch, as many routes are already shared with private cars. It is considered that as the bus | None. |

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| | | | services are not operating at full capacity within the town, there is little requirement for addition public transport that follows the same route. | |
| Transport | 106/ 167 | Why is Redditch the terminus of the railway? The Draft Core Strategy fails to consider the use of rail to any great detail. In its vision for 2020 Warwickshire County Council sees a future where a rail link between Redditch and Alcester is restored. A full connection back to Evesham would be the ideal – but would be difficult and costly. | See response of 098/141. | None. |
| Transport | 110/ 600 | Public transport is an issue in Redditch, both bus and train services. These need to be addressed to accommodate another 2243 dwellings. | A Transport Assessment will be commissioned as part of the evidence base for the Core Strategy. This study will analyse what is required to be done in Redditch, in terms of transport infrastructure to accommodate future growth. | None. |

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| Transport | 113/ 178 | Currently no bus service from Hither Green Lane into Redditch. A local service is needed.<br><br>Difficult to cross the junction of A441 and Dagnell End Road. | The provision of bus services cannot be controlled by the Core Strategy.<br><br>Junction improvements can be incorporated into the Area Action Plan that will cover the new growth area. | None.<br><br>None. |
| Transport | 123/ 194 | The most sustainable location for development within the Borough is within the existing urban area of Redditch, either on established public transport routes or close to public transport interchanges.<br><br>Frequency of services on the cross-city line between Redditch, Birmingham New Street and Lichfield be increased from 2- 3 services per hour. | The Core Strategy promotes the sustainable location of new development through the Settlement Hierarchy Policy and the Distribution of Development Policy.<br><br>The frequency of the service of the cross city line is scheduled to be increased; this project is detailed within Network Rails Strategic Business Plan. | None.<br><br>None. |
| Policy SC.4 | 017/ 249 | The Reasoned Justification mentions the Quite Lane Initiative – neither the policy | Is not appropriate for Quite lanes to be designated through the Core Strategy as these are | None. |

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| | | nor the justification deals with this issue. There are opportunities for Quiet Lanes in Redditch further consideration could be had in an SPD for the LDF. | very specific. It is considered that Quiet Lanes can be designated through a process outside of the Core Strategy process and would involve discussions with the Highways Agency and other Council Departments. | |
| Transport | 027/ 471 | Development in Redditch has the potential to impact upon the SRN especially given the proximity of the district to the motorway network and the regional centre. It is encouraged that the SRN remains a key determinant when the Council is developing options for the scale and location of development in the district. The need for a model to test the impact of development around Redditch upon Junction 3 of the M42 will be kept under review. | The SRN has been considered when developing a preferred location for future growth. The Study into the Future Growth Implications of Redditch' First Stage and Second Stage Report considered traffic implications when determining the appropriateness of each location. The SRN will continue to be given due regard when considering the appropriate location for future development, in particular large growth areas. | None |

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| Transport | 049/758 | Passenger Transport routes should not be opened up to general traffic, as suggested on pages 96 and 97. This is inconsistent with other areas within the Draft Core Strategy and a rational, technical explanation has already been given to justify why this should not be included during the Issues and Options Consultation. | The 'Green Strategy' Technical Paper will justify the reasons behind the policy direction to give priority to buses but allow general traffic to access small sections of the route. | None. |
| Transport | 049/ 759 | The requirement for each new development to provide a Transport Assessment is very welcome. Worcestershire County Councils guidance for Transport Assessments and Statements should be referred to when compiling and Transport Assessment or Statement and should be passed to County. This guidance should be referred to in the Strategy. | Worcestershire's County Council guidance on Transport Assessments will be considered through the 'Green Strategy' Technical Paper. It is not considered appropriate to detail specific documents such as this within the Core Strategy. However Development Control Officers will be aware of this guidance when considering submitted Transport Assessment and | None. |

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| | | A Developer Transport Brief (submitted with comments) should be utilised by potential developers for sites within Redditch Borough. The brief outlines the steps the developer should take towards creating sustainable development in transport terms. This should help meet the strategies objectives and should be referred to. | when requesting Transport Assessment from applicants.<br><br>As above it is not considered appropriate to detail every best practice document within the Core Strategy. However Development Control Officers will be aware of this guidance when considering submitted Transport Assessment and when requesting Transport Assessment from applicants | None. |
| Transport | 049/ 760 | Agree with the proposal for the Arrow Valley Countryside Park to be used as a coach way (page 97). This offers a sustainable solution by utilising an existing facility that could be integrated with improved passenger transport access to the park. It also offers the opportunity for improved | Support noted. | None. |

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| | | transport infrastructure. | | |
| Transport | 103/ 162 | Frequently, footpaths do not lead to destinations, and require users to follow complex routes. | It is a requirement of the Sustainable Travel and Accessibility Policy to ensure there is *"comprehensive network of routes for pedestrians"* delivered as part of any new development, this should help to ensure the footpath network is improved. | None. |
| | | Many developments are designed as blind alleys off the distributor roads, making it difficult for a bus to go into their centres. | There is a High Quality and Safe Environment Policy contained within the Core Strategy which will guide future development, this will help to work towards high quality design that prevents obstructed views. | None. |
| | | Industrial routes are not served by the bus routes, either in terms of time or, in many cases, adjacent routes. | Bus routes are under the control of private bus providers; this is outside of the Core Strategy remit. | None. |

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| | | Policy SC.4 needs to refer to an overall plan and require contributions from all construction to a fund that pays for the construction of links and interchanges that would enable new orbital routes to run round both the central and western residential areas and link in to areas of employment. This would prevent people needing to cross the town, it is unusually necessary to go to the town centre and get another bus to your destination. It is more important to get funds for this requires than to demand cycle routes which are used by only a minute portion of the community. | The need for infrastructure within the Borough is being developed via regular meetings with infrastructure providers. This will form the basis of the Infrastructure Delivery Plan to demonstrate delivery. | |
| Transport | 153/ 506 | It is recommended that the Draft Core Strategy acknowledges the role | Noted. | None. |

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| | | sustainable transport can play in the strategic development of the district and wider area.<br><br>Support that the document has recognised the importance of accessibility by a range of transport modes and is referenced in multiple policies throughout the document.<br><br>Public transport should be a key theme running throughout the document and the plan should also take cross boundary issues into account. | Support noted.<br><br>It is considered that the promotion of public transport is included within the Core Strategy, through the sustainable travel and accessibility policy. It is anticipated that a cross-boundary transport assessment will be completed as part of the evidence base of the Core Strategy. | None.<br><br>None. |
| Transport | 153/ 507 | Transport and in particular public transport should be a key theme throughout the document, as this will help to | See response to 153/ 506. | See action to 153/ 506. |

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| | | promote accessible developments and sustainable regeneration. | | |
| Transport | 153/ 509 | It is disappointing that rail does not feature greatly in the Transport Section of this document. Rail is an important mode of transport within the Borough with an annual footfall of over 775,000 users. Rail should therefore be a consistent theme within the document. The Cross City South Redditch Branch line has been earmarked for enhancements in the capacity of the line, which will bring about an improved frequency of rail services to the Borough. | Agree. | Incorporate the vision for rail within the Sustainable Travel and Accessibility Policy. An additional point will be inserted within the policy, which states, *"increasing services levels to and from Redditch Railway Station."* |
| Transport | 153/ 510 | Welcome the recognition that spatial planning can help to minimise the frequency and distance of journeys that people need to undertake. It is recommended that private car | Agreed. | This information will be incorporated into the introduction to the Sustainable Travel and Accessibility Policy. |

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| | | transport is highlighted as contributing to $CO^2$ emissions and that encouraging modal shift to a more sustainable high quality public transport product will help to contribute towards lower $CO^2$ emissions. | | |
| Transport | 153/ 511 | It is recommended that development should be focused in places that are well served by public transport outlined by Regional Spatial Strategy Policy T2. If this is not possible new infrastructure will be required from the outset to encourage sustainable travel. | There are a number of policies within the Preferred Draft Core Strategy that ensure new development is located in the most sustainable location. Policies include SP. 1 'Settlement Hierarchy', ES.1 'Location of new employment', ES.2 'Office development', ES.6 'Retail', H.1 'Leisure and Tourism', H.3 'Health', SC.2 'Efficient use of land' and SC.4 'Sustainable Travel and Accessibility'. It is considered that the majority of these policies will be carried forward into the Submission Core Strategy; however this is still | None. |

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| | | | being considered. | |
| | | Consideration should also be given to strategic park and ride sites. | A Strategic Park & Ride facility for Redditch has not been identified by Draft Policy T6 of the WMRSS. | None. |
| | | Some residents, in particular, elderly residents in Redditch are likely to require special consideration in terms of travel and accessibility. Access to a frequent and convenient public transport can assist in greater accessibility for the elderly people, especially as from April 2008 people aged 60+ are entitled to a free bus travel anywhere across England. | Noted. | None. |
| | | Public transport can provide people within areas of deprivation the means to access employment and education opportunities, which can allow them to improve their quality of life. | Noted. | None. |

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| Policy SC.4 | 264/ 455 | Support for the section of this Policy which states that *"transport will be co-ordinated to improve accessibility and mobility, so that sustainable means of travel, reducing the need to travel by car and increasing public transport use, cycling and walking should be implemented."*<br><br>Support for criterion (i) and suggest that this can be achieved through an appropriate mix of housing and employment uses in Redditch, providing opportunities for people to live close to their place of work.<br><br>Criterion (iii) seeks to ensure that infrastructure for pedestrians and cyclists is provided and that it facilitates walking, cycling and public transport. It is suggested that | Support Noted.<br><br>Support Noted.<br><br>The new process for contributions is to collect money via a Community Infrastructure Levy. This Levy ensures that money is spent on the most necessary and suitable infrastructure. Therefore this comment is not | None.<br><br>None.<br><br>None. |

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| | | the wording of criterion (iii) is amended to state, "where appropriate, *and relevant to the development proposals*, the provision or improvement of off-site cycle routes, footpath links and related infrastructure will be sought. | applicable. | |
| | 103/164(a) | In order to reduce the need to travel and move to more sustainable travel patterns there should be an improvement in the bus network and communities should be concentrated within existing boundaries, rather than take up more Green Belt land. | Bus routes are under the control of private bus providers; this is outside of the Core Strategy function. | None. |

## *Vision and Objectives*

| **Policy/ Issue/ Para/ Doc** | **Respondent No./ Representation No.** | **Summary of comment** | **Council's response** | **Council's proposed action** |
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| Objectives | 005/482; William Davis Ltd | Objective 2 inconsistent with national policy. Carbon neutral target is set for 2016 for residential and 2019 for other development. Objective would be adopted in advance of the target and would be highly constraining on development, especially in the current economic climate which can endanger housing delivery. | Agree with the respondents comments regarding the targets for carbon neutral development and at this stage it is not the intention of the Borough Council to evidence any deviations from national policy. The objective can be reworded to clarify the intentions. | Amend Objective 2 as follows: "To ensure that all new development in Redditch Borough ***will work towards the achievement of being carbon neutral in line with the Code for Sustainable Homes."*** |
| Objectives | 021/071k; West Midlands Regional Assembly | Objective 4 should include the *historic* environment as well as the rural and built environment. | Agree. | Amend Objective 4 as follows: *"**To protect, promote and where possible enhance the quality of the Boroughs natural, rural and historic environment and its best distinctive features"*** |

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| Vision | 027/472; Highways Agency | Pleased that the Core Strategy recognises the need to accommodate growth in a sustainable way, reducing the carbon footprint of communities and increasing accessibility. Vision would be strengthened by reference to sustainable modes of transport. | Agree. | Addition to the Vision as follows: ***"Sustainable modes of transport will be supported and delivered as well as the infrastructure needed to support planned development."*** |
| Vision & Objectives | 028/103; GOWM | Commends relationship with the SCS Vision. However, whilst the Vision of the Core Strategy outlines an ambition for the Borough, this should be regarded as a work in progress and should be made more locally distinctive. Suggests referring back to the Spatial Portrait and introductory paragraphs can help to make the Vision locally distinctive for the Borough. | Agree. Amendments to the vision can be made to make it more locally distinctive, whilst referring back to elements of the spatial portrait. Revise the vision to re-focus on key strategy areas which are important for Redditch to achieve. | Revise the vision to re-focus on key strategy areas which are important for Redditch to achieve: - Green; Sustainable Settlements; Enterprise and Skills; Retail; Balance between housing and employment; High quality and safe design; Historic Environment; and Attractive facilities. |
| Vision | 029/702; Tetlow King c/o WMRSL | Support vision but reword to read: 'All new residential areas in Redditch will be of a high | Agree. | Amend the vision as follows: ***" All new development including residential areas in*** |

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| | | quality and safe design and contribute towards creating distinctive, sustainable places and communities that reflect the local character and are tailored to the needs of the people that live in the Borough.' This will emphasise the Council's commitment to creating sustainable communities, as envisioned in the SCS. | | ***Redditch will be of a high quality and safe design and contribute towards creating distinctive, sustainable places and communities that reflect the local character and are tailored to the needs of the people that live in the Borough."*** |
| Objectives | 029/703; Tetlow King c/o WMRSL | Fully support Objective 9. Ensure it is prioritised as the requirement for existing and future housing to meet all local needs is imperative to the success of any community. | Note support. It is not appropriate to prioritise objectives, all are equally important to ensure the vision for Redditch is realised. | No change. |
| Objectives | 042/467; Stoneleigh Planning c/o Gallagher Estates | Objective 9 should refer to completion of sufficient homes to meet the scale of new housing provision for Redditch as per the phase two revision. This should include a mix and type at a number of locations. | Objective 9 refers to having sufficient homes to meet needs and this refers to the 4000 dwellings related to meeting Redditch's requirements. The objective already refers to provision for a range, mix and | No change. |

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| | | Reference should also be made to part of the provision being met on a strategic development site at Bordesley Green and Bordesley Park to the north of Redditch in Bromsgrove District. | type in the best locations.<br><br>It is agreed that reference to the SUE or SUEs would be appropriate in a separate objective, once the broad location or locations have been determined. | Include a new objective (12) on the provision of new homes in a SUE as follows:<br>***"To work closely with neighbouring authorities to deliver a Sustainable Urban Extension to the North of Redditch's urban area within Bromsgrove District and a Diversification Park at Winyates Green in Stratford on Avon District."*** |
| Vision | 049/728; Worcestershire County Council | First sentence of vision needs to be amended. The word 'heritage' needs replacing with 'environment'.<br><br>The wording for all development making a 'positive contribution to climate change' should be clearly expressed to state that all development will make a positive contribution to | Agree.<br><br>Agree. | Reference to heritage will be replaced with historic environment in the vision.<br><br>Addition to the vision as follows:<br>*"**Also, new and existing low carbon communities will be highly accessible and attractive, making the most*** |

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| | | mitigating and adapting to the effects of climate change.<br><br>It is also overly-optimistic - development should minimise its contribution to climate change because providing a net benefit is extremely challenging. | This is not a requirement of the vision. | ***minimal contribution possible to the effects and impacts of climate change."***<br><br>No change. |
| Objectives | 049/729; Worcestershire County Council | Biodiversity is not picked up in the objectives. Reword the first objective as suggested: ' To have high quality open spaces and Green Infrastructure which have biodiversity value and ecological connectivity'. Add the following wording to the end of the second objective: 'and maximise opportunities for wildlife'.<br><br>It is unclear in objective 2 what the term 'carbon neutral' covers. | It is agreed that the objectives can be amended broadly as suggested; however for clarity, biodiversity and wildlife should be included in the same objective. Revisions to Objective 1 as suggested by the respondent can be included in addition to reference to the change to objective 2.<br><br>Agreed. The objective can be reworded to clarify the intentions. Glossary to the Core Strategy explains the definition of 'carbon neutral'. | Amend Objective 1 as follows: ***"To have high quality open spaces and Green Infrastructure which maximises opportunities for biodiversity value, wildlife and ecological connectivity".***<br><br>Amend Objective 2 as follows: "To ensure that all new development in Redditch Borough ***will work towards the achievement of being*** |

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| | | | | ***carbon neutral in line with the Code for Sustainable Homes."*** |
| | | Recommend an additional objective which should include the pursuit and routine incorporation of ecologically advantageous building technologies as an integral part of promoting Green Infrastructure e.g. green and brown roofs, living walls and opportunities for breeding bats. | This detail is more appropriate for policy rather than vision/ objectives. | No change. |
| | | Amend Objective 4 to read 'rural and historic environment'. 'Historic environment' is the preferred national terms to encompass historic buildings, landscapes and archaeological sites rather than 'built' environment. | Agree. | Amend Objective 4 as follows: *"**To protect, promote and where possible enhance the quality of the Boroughs natural, rural and historic environment and its best distinctive features"*** |
| | | Objective 11 on page 21 does | It is considered that many of the Core Strategy objectives will achieve multiple key themes. This has meant that the purpose of the | Remove Key Theme/Objective table on PDCS Page 22. |

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| | | not appear on page 22 under the better environment Key Theme. | demonstration of which objectives achieve the key themes is now superfluous. | |
| Vision & Objectives | 085/520; Turley Associates c/o Scottish Widows | SWIP supports and welcomes the vision and objectives. However the commitment to improving the vitality and viability of the town and district centres in Objective 9 should acknowledge the importance of improving established retail facilities through investment and complementary development. | Whilst the Borough Council agrees that this is important, there are many contributory factors that would improve the vitality and viability of the town centre which cannot all be referenced in a core strategy objective. | No change. |
| Vision | 088/530; Natural England | Fully support 'green' focus for the vision. Intention to preserve and enhance biodiversity, landscape and historic heritage is welcomed and will ensure new development is locally distinctive. Disappointing that the ambition to be 'ecologically rich' is removed.<br><br>Endorse the vision for low | The ambition to be ecologically rich was difficult to quantify and monitor. Amendments to Objective 1 are suggested.<br><br>Agreed that reference to low carbon communities and | Amend Objective 1 as follows: ***"To have high quality open spaces and Green Infrastructure which maximises opportunities for biodiversity value, wildlife and ecological connectivity".***<br><br>No change. |

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| | | carbon communities and for all development to make a positive contribution towards the effects of climate change. Recommend recognition of the role of green transport in achieving this end.<br><br>The vision should recognise the need for climate change adaptation as well as mitigation - all new development must be 'future proofed' i.e. built with future climates in mind. | sustainable modes of transport should be maintained in the vision.<br><br>Agree. | Addition to the vision as follows:<br>*"**Also, new and existing low carbon communities will be highly accessible and attractive, making the most minimal contribution possible to the effects and impacts of climate change."*** |
| Objectives | 088/531; Natural England | Support Objectives particularly 1,2,3,4,5 and 11 | Noted. | No change. |
| Objectives | 089/516; Theatres Trust | Support objective 6 and objective 8 as these two are directly linked. | Noted. | No change. |
| Vision | 091/126 Atisreal c/o West Mercia Constabulary | Welcomes the aims and objectives but no reference made to ensuring Redditch has sufficient infrastructure to meet future development | Agreed that appropriate reference can be made in the revised vision. | Addition to the vision as follows:<br>***"Finally Redditch Borough will contain excellent public services and infrastructure*** |

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| | | requirements. Amend to read ' It will be an enterprising Borough containing diverse employment areas, a skilled workforce, vibrant centres, excellent public services and infrastructure and attractive facilities.' | | ***to support its communities."*** |
| Objectives | 091/127 Atisreal c/o West Mercia Constabulary | Endorses Objective of 'Reducing crime and anti social behaviour and the fear of crime'. However there is no reference to policing. Previous response from Borough Council was that this is not a spatial planning function. This is incorrect because police are key partners in the preparation of the sustainable community strategy and this needs to be reflected in the core strategy. | Although it is recognised that police are valuable key partners in terms of delivery and preparation of community strategies, the objectives for a Core Strategy are not the correct place for reference to specific services. PPS12 advocates that objectives should focus on the key issues to be addressed and that it is the delivery strategy which achieves these objectives. Where relevant the delivery strategy would be the most appropriate location for such references. | Changes to delivery strategy to be confirmed following infrastructure delivery meetings. |

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| Vision | 093/487; Environment Agency | Reference should be made in the vision to the water environment as follows: 'Its character, biodiversity, water environment, landscape and historic heritage will have been preserved and enhanced. | Agree. | Amend the vision as follows: ***"To achieve this green strategy, Redditch's character, biodiversity, water environment, open space and landscape will have been preserved and enhanced."*** |
| Objectives | 093/488; Environment Agency | Suggest that flood risk be a separate objective to climate change. There is no reference to protecting and enhancing water, air and soil.<br><br>The need to protect and enhance biodiversity has not specifically been included. | Agree.<br><br>Agreed. Amendments to Objective 1 may satisfy the respondent. | Amend Objective 3 as follows: ***"To reduce the causes of, minimise the impacts of and adapt to climate change ~~especially flood risk~~"***<br><br>Additional Objective (13) as follows: ***"To protect and enhance water, air and soil and minimise flood risk".***<br><br>Amend Objective 1 as follows: ***"To have high quality open spaces and Green Infrastructure which maximises opportunities for*** |

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| | | | | ***biodiversity value, wildlife and ecological connectivity".*** |
| Vision | 102/146; Worcestershire County Council Archaeology Unit | Page 20, paragraph 6 'character, biodiversity, landscape and historic environment' for consistency. | Agree. | Change reference from 'historic heritage' to 'historic environment'. |
| Objectives | 102/147; Worcestershire County Council Archaeology Unit | Page 21 Objective 4 change to '…rural and historic environment'. Historic environment is the preferred national term to encompass historic buildings, landscapes and archaeological sites. | Agree. | Amend Objective 4 as follows: ***"To protect, promote and where possible enhance the quality of the Boroughs natural, rural and historic environment and its best distinctive features;*** |
| Vision & Objectives | 104/029; RPS | Suggests that in neither Core Strategy for Redditch or Bromsgrove does the Spatial Vision refer to a Sustainable Urban Extension to Redditch. Given that the emerging RSS requires at least 3,300 dwellings on the periphery of Redditch, it is recommended that both Core Strategy Visions incorporate reference to the | Agree. Redditch Borough Council remains committed to delivery of sufficient residential and associated development to meet its needs as set down in the WMRSS; therefore elements of the suggested addition would be appropriate for inclusion in the vision. | Add to the vision to include reference to the delivery of Cross Boundary development in Bromsgrove and Stratford-on-Avon Districts as follows: ***"A Sustainable Urban Extension to the north of Redditch Borough will be developed whilst working closely with neighbouring Bromsgrove District Council.*** |

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| | | extension. In terms of Redditch's Core Strategy, in line with PPS12, the following statement is recommended: 'After the town centre, the focus of growth will be a Sustainable Urban Extension (SUE) adjacent to the North West of Redditch, partly within the administrative boundary of Bromsgrove District Council. This will comprise at least 3,300 dwellings and complementary uses adjacent to the existing town. It will be well integrated and provide high quality new housing, employment, retail and communities facilities to meet the needs and demands of Redditch along with assisting the urban regeneration of the town. It will provide sustainable transport and accessibility opportunities and greatly enhance the natural and built | | ***It will be well integrated and provide high quality new housing, employment, retail and communities facilities to meet the needs and demands of Redditch along with assisting the urban regeneration of the town. A Diversification Park adjoining Redditch but in Stratford-on-Avon District will be delivered".*** |

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| | | environment in the North West area of Redditch'. | | |
| Vision & Objectives | 104/030; RPS | The strategic planning policies contained within the Core Strategy do not adequately deliver the objective for the provision of new homes.<br><br>Recommend that more commonality is contained within the objectives of both | In relation to the objective for new homes being delivered and its coverage in subsequent policy, it is assumed that this relates to the draft Core Strategy referring to the SHLAA estimated capacity being below the draft RSS housing requirements for Redditch. Since the PDCS the Phase Two Revision RSS has designated revised targets to each Local Authority, Redditch Borough Council now has sufficient clarity to refer to its housing requirements in policy. However this is not a matter which necessitates amendments to the vision or objectives.<br><br>Objective 9 refers to having sufficient homes to meet needs | No change.<br><br>Include a new objective (12) on the provision of new homes in a SUE as follows: |

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| | | Redditch and Bromsgrove Core Strategies in order to demonstrate a clearer correlation between Strategic Vision, Objective and Policy where the urban extension is concerned. It is suggested that a new objective 12 be added or objective 9 be amended to include clear reference to delivering a SUE adjacent to Redditch. | and this refers to the 4000 dwellings related to meeting Redditch's requirements. It is agreed that reference to the SUE would be appropriate in a separate objective. | ***"To work closely with neighbouring authorities to deliver a Sustainable Urban Extension to the North of Redditch's urban area within Bromsgrove District and a Diversification Park at Winyates Green in Stratford on Avon District."*** |
| Vision & Objectives | 133/206; Miss C John (RBC) | The comment 'All development will make a positive contribution to the effects of climate change' needs to be reworded.<br><br>Whilst the vision for all new developments in the Borough to be carbon-neutral is positive, it is deemed somewhat | Agree.<br><br>Whilst it is agreed that there is no justification for carbon neutral development at this time, requirements for carbon neutral developments must be | Change the vision to state: ***"new and existing low carbon communities will be highly accessible and attractive, making the most minimal contribution possible to the effects and impacts of climate change."***<br><br>Amend Objective 2 to read, "To ensure that all new development in Redditch Borough ***will work towards*** |

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| | | ambitious. There needs to be a clear idea of how this target will be achieved and enforced. Does it, for instance, refer only to domestic properties, or to all development? Similarly, if the Abbey Stadium project is carried out, how can it be ensured that it will be carbon-neutral? | based upon National and Regional requirements and the objectives can be amended to reflect this; however during this plan period up to 2026, the national target in the CFSH (Level 6) for carbon neutral developments remain appropriate for inclusion. The details regarding the application of the Code for Sustainable Homes is included in the relevant policies and delivery strategy. | ***the achievement of being carbon neutral in line with the Code for Sustainable Homes."*** |
| | | Suggests the need to build energy-efficient and green new commercial space to support the Economic Development objectives of encouraging green economy/green jobs. | The vision in the PDCS stated that "…new growth will have been achieved in a sustainable way giving rise to high quality, low carbon communities". This statement intentionally does not preclude any forms of development including commercial, and it would be too detailed for a vision to be | No change. |

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| | | | specific on the application of energy efficient standards; however the suggestion would be appropriate for consideration in the Green Strategy. | |
| Vision & Objectives | 153/505; Centro | Welcomes overall vision and objectives. It is important that there are strong correlations between RSS objectives, Policy T1-T12 of the Regional Transport Strategy and WMLTP. | Noted. | No change. |
| Objectives | 202/328; Tetlow King c/o Bromsgrove District Housing Trust and West Mercia Housing Group | Support Objective 9, Ensure it is prioritised as the requirement for existing and future housing to meet all local needs is imperative to the success of any community. | Note support and agree with the respondent regarding the importance of meeting housing need. However it is not appropriate to prioritise objectives, all are equally important to ensure the vision for Redditch is realised. | No change. |
| Objectives | 212/350; Herefordshire and Worcestershire | Objective 4 "To protect, promote and where possible enhance…natural, rural and built environment…" is | Noted | No change. |

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| | Earth Heritage Trust | welcomed and supported. All objectives under A Better Environment for Today and Tomorrow are welcomed and supported. | | |
| Vision | 223/365; Harris Lamb c/o James Smith & Son and Smithers Oasis Ltd | Support vision which identified the objective to regenerate the town centre; a key element of that regeneration will be through the redevelopment of strategic sites which will help improve connections to the town centre | Noted. | No change. |
| Vision | 263/431; English Heritage | In most areas the historic environment will be a defining characteristic of the plan area. The vision should therefore include reference to the long-term aspirations for it and how its future management might contribute towards social, economic and environment aspects of the strategy e.g. conservation led initiatives. Make reference to | Agree. The vision can be strengthened with specific reference to redevelopment of the town centre. | Amend the vision as follows: "In particular, the regeneration of the Town Centre will improve connectivity between key sites ***and will have respected the distinctive characteristics of the historic environment."*** |

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| | | safeguarding/reinforcing the distinctive character of the various parts of the plan area.<br><br>In the case of Redditch due to its local circumstances and recent planning history as a New Town, the vision achieves acceptable integration of the historic environment in terms of a specific reference to preserving and enhancing its historic heritage which should be retained. | It should be noted that the reference to preserving and enhancing historic heritage is proposed to be changed to 'historic environment'. | Reference to heritage will be replaced with 'historic environment'. |
| Objectives | 263/432; English Heritage | Include specific objective for the historic environment or one that refers to historic environment as part of a broader environmental objective or objective promoting local distinctiveness. It should not repeat national guidance. Amend Objective 4 to include reference to historic environment as follows '…the | It is considered that amendments to Objective 4 would satisfy the respondent. | Amend Objective 4 as follows: ***"To protect, promote and where possible enhance the quality of the Boroughs natural, rural and historic environment and its best distinctive features."*** |

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| | | quality of the Borough's natural, rural, historic and built environment'<br><br>Welcome general thrust of Objective 11 but underline the importance of encompassing the contribution of the historic environment to landscape character and distinctiveness in both urban and rural environments. | Agree. | Amend Objective 11 as follows: ***"To maintain and support local landscape character and distinctiveness in both urban and rural areas."*** |
| Objectives | 264/443; CBRE c/o Mettis Aerospace | Support Objective 9. Suggest inclusion of Objective 5 from the Issues and Options paper to ensure efficient use and re-use of land. Objective 9 and 5 should then be prioritised. | The previous objective 5 was not considered to be distinctive enough for Redditch however the Borough Council remains committed to the national requirement to ensure efficient use and re-use of land, which is also echoed in the WMRSS, which forms part of the Development Plan for Redditch. It is not appropriate to prioritise objectives, all are equally important to ensure the | No change. |

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| | | | vision for Redditch is realised. | |

## *Waste*

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| Waste | 049/ 745 | The Core Strategy must ensure it has taken account of waste development within the overall provision for employment land as specifically noted within the West Midlands Regional Spatial Strategy. The Waste Core Strategy Issues and Options Consultation proposed that 17.7% of the County's new waste management capacity, up to 2027, should be in Redditch District. | The Core Strategy does not make reference to the exclusion of waste management from future employment land provision. The Employment Land Review, which contains the detail on potential future employment site allocations, simply sets out the most suitable type of land use class for that site, but does not make specific reference to any particular facilities. In relation to waste management falling under different use classes, Officers would point | Consider reference to waste management in the Enterprise and Skills Strategy of the Core Strategy. |

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| | | | out that the omission of end uses in the Core Strategy will not prohibit the implementation of required facilities. If a site is required to be identified and is backed up by evidence then a site will be identified through the Site Allocations and Policies DPD but reference can be made to waste management facilities in the employment policies. | |

## *Water and Flooding*

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| Policy BE. 2 | 021/ 079 | Policy BE.2 generally accords with the relevant parts of emerging West Midlands Regional Spatial Strategy Policies SR1, SR2 and SR3. | Noted. | None. |

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| Policy BE.2 | 049/ 725 | Although the document contains a Policy on Flood Risk and Water Management, insufficient attention is given to issues of water infrastructure/ resources and water quality. | Since consultation on the Preferred Draft Core Strategy the Flood Risk Assessment and Water Cycle Strategy has been updated. These documents now give more scope to the tools the Core Strategy can use to ensure flood risk is minimised and water management is a high priority. A Strategic Flood Risk Assessment Level 2 will be commissioned which will also influence the Core Strategy. Recent advice states that policies should not be in a Core Strategy that do not relate to significant locally distinctive issues. It is considered that flooding in Redditch does not frequently cause severe problems and therefore does not require a policy in the Core Strategy; therefore it is unlikely that the Submission Core Strategy will contain a policy relating to flood risk. Water quality and resources have been a main issue for the Sustainability Appraisal. | Ensure the outcomes of the updates to the Flood Risk Assessment, and Strategic Flood Risk Assessment Level 2 (when completed) and Water Cycle Strategy are considered when preparing the Submission Core Strategy. |
| BE.2 | 049/739a | Focus of policy is primarily on | Pollution has been incorporated | None. |

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| | | flood risk and the use of SUDs as a means of reducing flood risk. Pollution has not been addressed in this policy and as a minimum should be cross-referenced to Policy BE.4 Pollution. | into the new Natural Resources Policy. The intention of this aspect of the Policy is to ensure pollution from new development is reduced. It was not considered appropriate to include pollution in the Flood Risk and Water Management Policy because although pollution is considered to have a strong link to water issues, pollution also has links to air and land and therefore it would be inappropriate to link it to just one. A reference could be made between the Natural Environment Policy, however it is considered that all policies should be used it conjunction and the Core Strategy would be made very lengthy making overly exhaustive links. | |
| BE.2 A | 049/739b | How will SFRA Level 2 inform this Core Strategy? | The SFRA Level 2 will inform the Core Strategy by detailing any strategic issues relating to flood risk management and defence infrastructure, in particular informing the Infrastructure Delivery Plan which ensures the Core Strategy is deliverable. | None. |

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| | | | The SFRA Level 2 will feed into the Proposals Map by identifying and mapping the functional floodplain.<br><br>The SFRA Level 2 will also provide guidance on appropriate polices that could be used for specific sites and would also consider strategic sites. | |
| BE.2A | 049/739c | Item i and ii are taken from PPS25 and do not need to be repeated. Instead the Policy could reflect the Governments response to the Pitt review on flooding, which recommends Local Authorities undertake a Surface Water Management Plan. | PPS 25 'Development and Flood Risk' requires that a flood risk policy is included within the Core Strategy. A surface water management plan is currently being prepared by Redditch Borough Council. | None. |
| BE. 2A | 049/739d | Text should be amended to reflect national policy which states, 'policy aims to make safe without increasing flood risk overall' rather than 'flood protection has been incorporated and that effects elsewhere have been fully assessed and mitigated against.' But text should not repeat national | Recent advice states that policies should not be in a Core Strategy that do not relate to significant locally distinctive issues. It is considered that flooding in Redditch does not frequently cause severe problems and therefore does not require a policy in the Core Strategy; therefore it is | None. |

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| | | policy. | unlikely that the Submission Core Strategy will contain a policy relating to flood risk. | |
| BE. 2A | 049/739e | Should have regard to the Redditch Policy Unit 9, as set out in the Severn Catchment Flood Management Plan produced by the Environment Agency. | The information contained within this document has been considered. The document notes that the appropriate policy approach for Redditch is to continue with existing or alternative actions, and flood risk is currently being managed appropriately. The document also suggests that a number of actions are outside of the control of the Development Plans system and should therefore be enforced by other bodies. | None. |
| BE. 2A | 049/739f | Supporting text may include reference to retro-fitting of existing properties that are at risk of flooding or have flooded to cope with further flooding events.<br><br>The main policy should include reference to making properties resilient to the effects of climate change i.e. flooding. | Retro-fitting of properties could be completed as a corporate project.<br><br>It is considered that the Core Strategy ensures that future properties developed in the Borough are resilient to the effects of climate change. | None.<br><br>Ensure the 'Green Strategy' Technical Paper refers to properties being resilient to the effects of climate change. |

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| | | This section could mention the need for evacuation routes to be planned into those developments in flood risk areas. | Warning systems have been analysed through the SFRA Level 1 Report demonstrating there are not any areas in Redditch that are at a significant risk where evacuation routes would need to be planned. | None. |
| BE. 2A | 049/ 739g | The section on flood risk and water management should highlight the links between green infrastructure, wetlands and wet wood lands and management of flood risk.<br><br>The policy should be amended to reflect the need to safeguard and where possible, restore the capacity of the floodplain thus reducing the risk of flooding. | It is considered that it may be appropriate to incorporate reference to links between green infrastructure, wetlands and wet wood lands and management of flood risk within the Core Strategy.<br><br>The Strategic Flood Risk Assessment for Redditch has considered the impact of each proposed development site on the loss of floodplain storage area. Following this it is considered that there does not need to be any other form of protection for the flood plain as the impact of future development has been considered. It is considered that flooding in Redditch does not frequently cause severe problems | None.<br><br>None. |

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| | | | and therefore does not require a policy in the Core Strategy; therefore it is unlikely that the Submission Core Strategy will contain a policy relating to flood risk. | |
| BE. 2B | 049/739h | First section of the text would fit better in the reasoned justification and instead policy could provide examples of types of water demand management techniques that could be used.<br><br>The policy could also make reference to the Code for Sustainable Homes and BREEAM standards. | It is considered that specific types of SUD techniques that could be used will be included in the Policy<br><br>It is considered that reference to the Code for Sustainable Homes and BREEAM is sufficiently covered elsewhere in the document and another reference in this policy would not achieve anything. | Update Policy to include reference to the specific SUD techniques that can be used in Redditch.<br><br>None. |
| BE.2B | 049/739i | Water supply and waste water infrastructure have not been addressed in this policy and only briefly in infrastructure Policy SC.7.<br><br>The Core Strategy should have regard to the relevant Catchment | Water supply and waste water issues will be addressed elsewhere in the Core Strategy.<br><br>These documents have been considered and reviewed as part | None.<br><br>None. |

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| | | Abstraction Management Strategies (CAMS) and 'West Midlands Regional Spatial Strategy (RSS 11) The Impact of Housing Growth on Water Quality and Waste Water Infrastructure'.<br><br>It is important to ensure adequate sewerage treatment works are in place to cope with the houses that are built. | of the Sustainability Appraisal Scoping Report.<br><br>Agree. Officers continue to liaise with relevant infrastructure providers to determine what needs to be provided. | None. |
| BE. 2B | 049/ 739j | The policy should make clear that infiltration based SUD techniques will not be suitable. | The Policy will be amended to clarify which SUDs techniques are suitable in Redditch Borough. | Ensure that SUDs techniques that are suitable in Redditch are detailed within the Submission Core Strategy. |
| Policy BE. 2 | 088/ 543 | Welcome section on water management. It would be helpful to list within the reasoned justification the types of SUDS which might be possible where infiltration SUDS are not.<br><br>In addition, new developments should be required to have water meters installed in order to encourage efficiency of use. | A list of SUDS techniques that are appropriate in the Redditch situation will be provided in the introduction to this policy.<br><br>It is not within the capacity of the Core Strategy to require all new development to have water meters installed; this would remain the responsibility of the water regulator. | Ensure that SUDs techniques that are suitable in Redditch are detailed within the Submission Core Strategy.<br><br>None. |

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| BE. 2 | 104/ 060 | The SFRA fails to consider the strategic planning issues associated within major urban extension adjacent to Redditch. There are no flood risk or water issues identified for the area that will comprise a North West Urban Extension.<br><br>The Policy should seek comprehensive solutions to addressing flooding and water issues as part of development schemes, where they can deliver wider solutions to existing issues. | The Strategic Flood Risk Assessment Level 2 will consider the flood risk issues associated with the major urban extension adjacent to Redditch.<br><br>It is considered that any scheme would need to address all flooding and water issues, any scheme that proposes solutions to existing issues would be appraised favourably against the Sustainability Appraisal Framework. | None.<br><br>None. |
| | 130/ 203 | Concern that significant new development proposals may alter the flow characteristics of the River Arrow. In the design of new development, drainage measures should be put in place in order that at times of extreme rainfall in the Redditch area the flow into the River Arrow heading southwards towards Alcester will be no worse than it would have been without | A Strategic Flood Risk Assessment has been prepared which considered the impact of proposed development areas on flooding. The recommendations from this have been considered and incorporated into the strategy. No issues have been raised to suggest that the flow characteristics of the River Arrow would be altered. It is considered | None. |

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| | | the new development. | that more detailed assessment may be done during planning application stages. | |
| | 133/ 207 | Greywater recycling, rainwater harvesting and green roofs should be encouraged strongly. Water harvesting can reduce the amount of energy needed to treat and process water. | Greywater recycling, rainwater harvesting and green roofs are a means of reducing Redditch's water use and reduce the amount of water entering the sewer system. These methods are very important in working towards the 'Green Strategy' within the Core Strategy and therefore a separate policy will be included within the Core Strategy. | Include the principle of a Greywater recycling, rainwater harvesting and green roofs within the 'Flood Risk and Water Management' Policy in the Submission Core Strategy. |
| Strategic Sites / Flooding | 093/ 491 | With regard to Strategic Sites no reference has been made to the water cycle study for Bromsgrove and Redditch (draft) and the Level 1 SFRA for Bromsgrove and Redditch. It is expected that the sequential testing and phasing of sites have been undertaken based on all sources of flood risk (including zones and depths of flooding) and appropriate policy to require the use of SuDS; flood risk reduction and enhancement. | The SFRA and Water Cycle Strategy have been considered when compiling Strategic Sites and it was deemed there was nothing significant to prevent these sites coming forward for development. | None. |

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| | | It is noted that within the 'SA assessment of large and strategic sites' under the decision making criteria 'no' has been ticked for all of the sites except the Abbey Stadium for the criteria 'does it take account of all types of flooding?' | Agreed. | None. |
| | | The availability and provision of appropriate infrastructure (foul/ surface water drainage, water supply) will inform the allocation and phasing of sites and may have financial implications. It therefore must be considered early on in the process. | Agreed. | None. |
| | | References made to infrastructure within the spatial policies (i.e. regeneration for the town centre, district centre redevelopment and Woodrow strategic site) appear to be towards transport only. However previously commenting on a proposed town centre strategy (20.3.2009) highlighted that part of the area is identified | Although there is an emphasis on the need for transport infrastructure within the Preferred Draft Core Strategy, the Infrastructure Delivery Plan will explicitly detail all of the forms of infrastructure that each site will require before they can be developed, including water infrastructure. The Infrastructure | None. |

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| | | as requiring a minor infrastructure upgrade, based on the draft water cycle strategy document. | Delivery Plan is currently being progressed. | |
| Flood Risk | 093/ 496 | This section could be titled 'Flood Risk and Water Management'.<br><br><u>Under A. Flood Risk</u> | Noted. This amendment will be made to reflect the contents of the section. | Re-title the Flood Risk section to 'Flood Risk and Water Management'. |
| | | For Policy BE.2 it should be noted that a Flood Risk Assessment (FRA) is also required for development proposals in Flood Zone 3b ('functional floodplain'). | Noted. This change will be made to identify what is requested nationally. Can this response be reworded so that it doesn't look as obvious that we are copying national policy. | Amend policy to ensure a FRA is required for development proposals in Flood Zone 2, 3a and 3b. |
| | | Reference should be made in the Policy to the SFRA to make it more locally distinctive. | It is not considered appropriate to make reference to specific documents within the policy as these documents are used to form the overall direction and content of the policy. It would only be considered appropriate to reference the document within the policy if it was specifically relevant to the policy. | None. |
| | | The Policy is generally supported however it could expand on areas | It is considered that these are very specific issues that would be | None. |

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| | | which are considered in less detail within PPS 25 such as achieving flood risk betterment; safe development requirements; other areas of flood risk; and protection and enhancement of watercourses (detailed options are presented under each theme that could be contained within the Policy).<br><br><u>Under B. Water Management</u><br><br>Support the reference to the water cycle study and the requirement for new development to include SuDS techniques. Support developments incorporating rainwater harvesting and grey water recycling.<br><br>It is suggested that reference is made to water quality within this policy and / or the policy on climate change. The outcomes of the final Water Cycle Study may inform this further. | considered at the planning application stage and that it is not necessary to detail this in a Core Strategy.<br><br>Support noted.<br><br>Agree. | None.<br><br>Include reference to water quality in Policy. |
| Water | 103/ 161 | The use of SUDS is not | There are a range of SUDS | A full list of SUDS techniques that |

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| | | applicable in Redditch due to non permeable clay. | techniques that are appropriate in Redditch, a list of these will be provided in the introduction to the 'Climate Change Policy'. | are applicable in Redditch will be incorporated into the Policy in the Submission Core Strategy. |
| | | There are problems with the system that collects surface water separately from the sewerage and puts it into the nearest watercourse; this has resulted in significant increases in flows in both the streams and rivers. This causes flooding further downstream at Studley, Alcester, Evesham, Pershore and Tewkesbury. This also has a scouring effect on many rivers and streams including the River Arrow which dropped 15 – 20 cm after the 2007 floods. | The SFRA and WCS has identified flooding or water management issues within the Borough. The SFRA Level 2 will identify mitigate measures for any areas in need of attention, this will be fed into the Core Strategy. | None. |
| | | Most of the rivers in the area will not sustain additional extraction in summer months. Water should be stored in the winter for use in the summer. | This is too detailed for the Core Strategy but could be undertaken as a corporate activity to address flood risk and water management in the Borough. | None. |

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| | | In areas where there is a risk of flooding, the policy should recognise that, rather than avoid building on large sections of land, artificially isolating communities and utilising more Green Belt than is necessary. | This is taken into account before any designations of land for future development. Areas of land that are at risk of flooding are not permitted for development unless full mitigation measures are implemented. | None. |
| | | The river should be straightened and controlled with weirs, with low level paths by the river, and protected banks set some five meters away from the channel to allow for wildlife movements along the river. | Flood risk mitigation measures are in the SFRA and will also be considered in the SFRA Level 2. It is considered that a range of these measures will be implemented corporately but are not appropriate for inclusion within the Core Strategy. | None. |
| | | The requirements to use grey water recycling and rainwater harvesting should be discarded in all but large commercial sites due to health and safety hazards posed by storing and using water. | This is outside of the remit of the Core Strategy. National planning policy continues to support greywater recycling and rainwater harvesting. There has been no national announcement or research to suggest that greywater recycling and rainwater harvesting is a danger to health and therefore this will still be promoted as a sustainable | None. |

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| | | The Arrow Valley lake should be used to hold an additional two meters of water, this would allow excess water to be diverted from the river and either stored for the summer, or released through a turbine. It should be a condition on all new development above the lake to contribute towards the construction of such a scheme. | method of water management.<br><br>This form of water management is too detailed for inclusion within the Core Strategy. | None. |
| Policy BE.2 | 264/ 448 | This Policy accords with the guidance contained within PPS 25. The following amendment should be made to the wording of this policy "The Borough Council will seek opportunities to use developer contributions to fund flood risk management schemes where these are not provided directly by the developer *and are directly related to the proposed development*." | It is considered that the proposed wording is appropriate and that flood management schemes should only be requested where they are directly related to the development. | Amend wording to read "The Borough Council will seek opportunities to use developer contributions to fund flood risk management schemes where these are not provided directly by the developer *and are directly related to the proposed development*." |
| | 129/201 Clive Wilson | With reference to Executive Summary, items 1.17 & 1.18 are | These factors will be considered through the SFRA Level 2. | None. |

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| | | entirely erroneous.<br><br>There are 2 main constraints on Foul Drainage: -<br>1. The ridge between the Spernal and Priest Bridge sewage treatment works catchments NOT "west of River Arrow" is the significant factor.<br>2. A lack of capacity in both Old Town and New Town/Duplication sewers between Hewell Road/Windsor Road and Ipsley Church Lane/Arrow Valley Park (Central)<br>These are based upon extensive observations and close working knowledge. Either pumping and/or considerable investment in off-site sewerage infrastructure would be required. | | |
| Flooding | 103/ 164(a) | The requirement to avoid flood zones and not contribute to surface water flooding in other | This is a mitigation measure that may be permitted though an exceptions test. However in the | None. |

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| | | areas would be met by the construction of water retaining areas and by treatment of the key water courses in such a way that they can cope with excessive flow without permanently damaging the habitat of the local flora and fauna.<br><br>Avoiding building close to rivers is also unattractive in that it puts pressure on good agricultural land rather than utilising the poorer areas; reworking the river bed is a much more attractive option, especially given the fall levels through the Borough. | first instance development should be avoided in flood risk areas.<br><br>Again, this is a mitigation measure that may be permitted though an exceptions test. However in the first instance development should be avoided in flood risk areas. | None. |

## *Winyates Green Triangle*

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| Winyates | 017/236; | Identified for employment or | It should be noted that the | No change |

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| Green Triangle | CPRE | housing. Does not belong to A435 ADR as part of Reserved Linear Strip.<br><br>This district has the benefit of this natural reserve but no public or primarily open space. Residents for many years have enjoyed Winyates Green Triangle as their public/primarily open space – to lose this site would be sacrilege. Another 300 households would densely urbanise the district contrary to the vision for Redditch in the draft Core Strategy.<br><br>As a 'local nature reserve', there is evidence of quality of small meadows, importance of special hedgerows dividing these and also along Drovers | Winyates Green Triangle is within the administrative area of Stratford-on-Avon District Council.<br><br>The Key Diagram contained within the Redditch Borough Council Preferred Draft Core Strategy indicates the area to be an area for future growth and it should also be noted that this is one of few peripheral areas around the Borough of Redditch which is not included in the designated Green Belt. The Winyates ward which adjoins the Winyates Green Triangle has an informal unrestricted open space provision level of 4.29ha/1000 population, although below the Borough average, there is clearly a level of open space that can be used by the inhabitants of the ward.<br><br>Notwithstanding the references by the respondent to the earlier White Young Green Report, the Second Stage Report of | No change<br><br>No change. |

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| | | Road containing some rare flora and fauna. With streams and ponds at every hedgerow, the meadows are constantly wet. Winyates Green Triangle has to be a Local Nature Reserve - Stratford's efforts to get the site identified as a Local Nature Reserve was discounted by Inspector and English Partnerships.<br><br>Wooded area south of Winyates Green Triangle – much ground water comes off the A435 and the area has several large ponds and an open culvert. The flooding aspect referred to by WYG is paramount and will definitely serve as a constraint.<br><br>Winyates Green is a residential district. To have this site built as industry will 'enclose' the northern section of Winyates Green District. The Triangle is | the Study into Future Growth Implications of Redditch also prepared by White Young Green (WYG Stage II) examines the Winyates Green Triangle in greater depth.<br><br>Paragraph 5.28 of WYG Stage II comments that the Winyates Green Triangle is an area of 'white land' within Stratford-on-Avon District Council's administrative area and that the site was included in the Stage I Report as being suitable for residential development and could contribute an estimated 300 units to the assessment.<br><br>Paragraph 5.29 continues by stating that the site relates to Redditch and unlike much of the A435 ADR land to the | No change<br><br>No change. |

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| | | enclosed by roads and Far Moor Lane is not suitable for HGV traffic from abroad. All existing empty and unused employment sites need to be in full use before new sites are released.<br><br>Constraints: -<br>1 Flooding;<br>2 Two historic monuments;<br>3 Prospective Local Nature Reserve and wooded area;<br>4 Lack of Public/Primarily Open Space.<br><br>Outcomes if land built on: -<br>1 Developing industry in a residential area;<br>2 Dense urbanisation of Winyates Green contrary to draft Core Strategy.<br><br>Potential issues relating to coalescence between Redditch and Mappleborough Green. | south, WYG felt that the site could be developed without detriment to the surrounding area. Further investigations regarding access will be undertaken as well as a Transport Assessment.<br><br>Para 5.30 of the WYG Report commented that the site has elevated roads to the north and may cause a noise nuisance. Whilst Redditch appears to have an adequate stock of B2 and B8 premises on established industrial estates, they perceived that there was a shortage of quality B1 accommodation and given the need to identify additional employment land, this site would be more suited to B1 rather than residential development.<br><br>The Stratford-on-Avon District Council Draft Core Strategy comments that they are faced with two significant | No change<br><br>On receipt of the WMRSS EiP Panel Report (Autumn 2009), officers will consider whether sufficient potential supply has been identified in the SHLAA to meet Redditch's housing allocation within the Borough, or whether further consideration will need to be given to contributions which could be made by the ADRs |

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| | | | development issues that have major implications for certain parts of its own area but has involved close working with neighbouring authorities because of geographical position. Accordingly, Policy CS6 makes provision for approximately 11.7 hectares of land at Winyates Green Triangle to be released for employment development to meet the needs of Redditch. Policy CS6 also makes provision for the extension of the Green Belt elsewhere to include land between the A435 and the boundary with Redditch, however further investigations into the status of Redditch's ADR will be undertaken.<br><br>The comments regarding the use of the land as open space are noted. However, the Council contend that there is adequate designated Primarily Open Space off Alders Drive in close proximity to the existing | No change. |

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| | | | housing development off Far Moor Lane. In the consideration of any future development of the Winyates Green Triangle, the Council are fully aware of the designated Special Wildlife Site off Far Moor Lane which will be given careful consideration. | |
| Draft Core Strategy – Cross boundary Issues / Winyates Green Triangle | 147/233; Stratford-on-Avon District Council | No objection to overall approach.<br><br>Developing Winyates Green Triangle could increase traffic on A435 – need for a bypass to Studley has been argued even without this allocation. Although bypass no longer committed, traffic impacts need to be fully assessed to see if the bypass is justified. Officer group should investigate further – outcome should inform Core Strategies of both Redditch and Stratford Districts | RBC has no disagreement with concerns relating to traffic impact. RBC is currently developing a policy for the Winyates Green Triangle in collaboration with stakeholders for adoption by Stratford-on-Avon District Council in their Core Strategy. In developing this Policy, provision will be made for investigation and resolution of traffic issues and a transport assessment will be undertaken. | Proposals for resolution of traffic impact around Winyates Green Triangle to be included in new policy for adoption in Stratford-on-Avon Core Strategy and RBC Core Strategy, if appropriate. |