

REDDITCH BOROUGH COUNCIL



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Development Plan Document



The outcome of Core Strategy Issues and Options Consultation

9 May 08 - 22 October 08

Outcome of the Issues and Options Consultation

Introduction

The first stage of public consultation in the Local Development Framework process took place between 18th June 2007 and 21st April 2008 to inform the preparation of the issues and options to be developed in the Core Strategy. This was not a statutory process but was advised by then Planning Policy Statement 12 “Local Development Frameworks” which stated “Local planning authorities should front load the preparation of development plan documents by facilitating early involvement and securing inputs from the community and all stakeholders.” This was summarized in the document “Statement of Consultation”. This is reiterated in the current PPS 12 “Local Spatial Planning” which states that involvement should be “from the outset – leading to a sense of ownership of local policy decisions”.

This was followed by publication of the “Core Strategy Issues and Options Document” which presented those matters relevant to Redditch Borough (Issues) and the ways in which they could be addressed through the application of planning policy (Options). It is a statutory requirement for these core strategies to be the subject of both public consultation and a sustainability appraisal.

The Core Strategy Issues and Options were the subject of extensive public consultation, between 9th May and 20th June 2008. The process is explained in the “Statement of Public Consultation” document. The outcome of these consultations on each issue or option is set out in detail below.

For clarity and conciseness, each respondent is given a unique Reference Number (URN) and these are set out at the head of each question. The identity of the respondents is listed at the end of the appendix. Each point made is summarized and the officer response to consultations on each option is set out.

Some suggestions were not considered suitable to be carried forward, usually because they were not matters that could be effectively addressed through spatial planning or because they would be contrary to national policies. Ideas which attracted popular support that were considered viable were taken forward to be assessed for sustainability (see “Draft Sustainability Appraisal for the Core Strategy Issues and Options document”).

The outcomes of both the Consultation process and the Sustainability Appraisal on well-supported suggestions are addressed in the introductory parts of each Chapter of the Draft Core Strategy. Where feasible, these are taken forward into the policy as drafted. Where this is not feasible, the reasons are stated in the chapter.

Outcome of the Issues and Options Consultation

The responses to the Issues and Options consultation are summarised in this document and are split into two parts:

Part 1 – Issues and Options Consultation Questionnaire Responses and Summary of responses

Part 2 – Summary of responses from the West Midlands Regional Assembly and Worcestershire County Council.

For both Part 1 and Part 2, Officers have provided each response with feedback, which generally falls into three broad categories:

- (i) the comment is a valid alternative option which has subsequently been assessed through the Sustainability Appraisal.
- (ii) comment suggested a general approach for the Core Strategy.
- (iii) comment referred to matters not appropriate to the Core Strategy.

Part 1

Summary of representations for Question 1

Question No.	Question Title
1	Is this draft Spatial Vision ambitious enough for Redditch Borough, or do you think it is too ambitious? What needs to change or what needs to be added?

URN of Consultees

001; 002; 004; 005; 006; 007; 008; 011; 012; 014; 016; 017; 018; 022; 023; 024; 028; 029; 030; 031; 033; 034; 035; 037; 038; 040; 041; 042; 048; 049; 050; 051; 052; 080; 081; 084; 088; 090; 091; 092; 096; 097. Total of 42 respondents.

Summary of Comment(s)

1. It is not too ambitious. There should be provision made to encourage wildlife and biodiversity through open spaces. (016)
2. The Vision is too ambitious, as it is dependant on the 'Midlands' image of manufacturing – Redditch is not in a high technology corridor. The safety is too dependant on the police and there is too much dependence on developers. This means dependencies to deliver this Vision is not in control of the Council. (017)
3. Please add, *"We will set a good example with regard to Heritage Buildings and Landscapes."* And *"We will set a good example with high ethical standards and fairness in every respect."* (011)
4. Linking the Vision to the Sustainable Community Strategy is a good approach.
5. The Core Strategy needs to be developed more to set out what Redditch will be like at the end of the plan period. (028)
6. The Vision is admirable. (008) (023) (038) (081)
7. Excellent Objectives, not easily achievable but worth a try. (018) (035)
8. A must is to keep Redditch green. By this I mean open spaces that events can be held on. It's a good wish list but don't forget Government and World effects all your points. (012)
9. The Spatial Vision is insufficiently focussed on meeting people's needs particularly in respect of housing, employment and commercial facilities. (042)
10. Aim high, never lower the Vision. (007)
11. Worth hoping for. (034)
12. Distinctively green is ambiguous (trees on ring road or low carbon communities). (030) (040) (092)
13. Ecologically rich may also be difficult to prove without surveys of species. (040)
14. Missing "Working with communities to ensure their voice is heard and they are involved". (040)
15. The Vision is too ambitious and nearing towards impossible. (033)
16. The inclusion of the term 'ecologically rich' is welcomed. (049)
17. Support the Vision statement for regenerating the pockets of deprivation in the Borough and to develop diverse employment areas and higher skilled workforce. (022)
18. The Vision is ambitious, aspirational and contains appropriate and laudable aims. (031) (048)
19. The phrase "distinctively green" is not sufficiently clear and may be open to a variety of interpretations. (031) (084)
20. How will Redditch become the safest town in England? – What are the targets and how are they measurable? What if it is not achieved if another Town has out performed? (031)
21. The Vision is to 2026 and the aim of the town being carbon neutral for many years is unachievable (define "many years"). Any aspirations for a carbon reduction strategy should be in line with government policy targets. This is too complex an issue to be included in a Visioning statement. Carbon neutral is not in glossary and may be confused with zero carbon. (031)
22. Extremely attractive wish list. (004)

23. Employment - the move of manufacturing to India, China and Eastern Europe (004)
24. Skills - need employment to develop skills (004)
25. Alternative facilities - will they ever get an up to date swimming pool complex? (004)
26. Regenerating the deprived areas and developing strong communities. A major problem is the management of community halls which should be local. (004)
27. Unrealistic. (006)
28. Timescale (18 years) is unrealistic. Little work has been done by the Council on any of these in the last 30 years. (001)
29. Seems like utopia, doubt if you will ever be able to achieve all Objectives but it's a good strategy to aim for. (002)
30. Local social housing with excessive costs in Western Areas leads to disadvantaged households, subsidising the well-off. (041)
31. The Vision is too ambitious. (014)
32. May be too ambitious when referring to developments having been carbon neutral for "many years". National policy seeks to move towards new housing developments being carbon neutral by 2016. However national debate and technical analysis of whether this is achievable is continuing and it is far from certain that the target will remain. (005)
33. Vision sounds great, we should aim high, and if we do not aim high we will achieve little. It is important to aim higher than what is achievable. (024)
34. The Vision is far too wide ranging to be achievable in the timescale proposed. We need to identify fewer key Visions and concentrate on those. The improvement in the overall quality of life of the residents is of paramount importance. (084)
35. To ensure a positive quality of life for disadvantaged minorities such as the disabled, chronically sick and children. (050)
36. Need to regenerate Town Centre areas for community activities. (051)
37. Add text that states development growth will be encouraged only where provision is made for necessary expansion of public services and infrastructure to support it. Insert after '*attractive facilities, excellent public services and infrastructure, vibrant centres...*' The inclusion of this recognises that development growth does not take place in isolation, but has wide ranging impacts that must be mitigated through proper funding arrangements for the public services and infrastructure that will be required to support it. (091)
38. This is a nice dream. What needs to change? Answer: Much greater enforcement of existing and new laws. It is sad that in many areas regulations are not enforced at all, or if attempts are made to enforce them – often they are not fully enforced. Far more resources needed and a change in attitude – to fully conform to legislation. (080)
39. No –they are a simple statement of values, not a Vision for the future for the Town, this could be any town in UK. (052)
40. The draft Spatial Vision appears to be suitably ambitious and support is given to the phrases 'distinctively green' and 'ecologically rich'. Such aspirations, combined with the commentary on high quality housing and carbon neutral development, are to be welcomed and are essential if the Borough is to develop sustainably (090) (088)
41. Support the Vision. It is consistent with national planning policy and the RSS. (029) (096)
42. The inclusion of environmental elements as a strong component of the Spatial Vision is welcomed. The Vision of Redditch Borough as "*distinctively green*" meets with approval, as does the ambition for the Borough to be "*ecologically rich*". This should help to ensure a 'green' landscape, incorporating Redditch's high proportion of open space, but also that this landscape is rich in biodiversity. (088)
43. The Vision for development to have been "*carbon neutral for many years*" could be more aspirational. The government has set targets for all new homes to be carbon neutral by 2016; therefore carbon neutral development will be the norm well before the LDF expires. It is unclear what 'many years' actually means; if this achievement were given a tighter deadline it could be more aspirational. (088)
44. Make certain that locations of new housing are not counter productive in that it requires excessive consumption of energy, vis any proposal at Webheath ADR, in that it appears to require 746 watts of energy for every person. (041)
45. Pumping foul sewerage back into Spernal Sewage Treatment Works. (041)

46. Roads into and out of Redditch to the north and west are good and give ready access to national motorways (nearer to 8 miles to M5, rather than 6 miles stated on p15). Roads to the east are not much better than country lanes and those to the south i.e. A435 and A441 are already choked and can't sustain any further Redditch growth without major improvement before 2012. (097)

47. Definitely not carbon neutral at the moment. (097)

48. Yes (037)

Officers Response to comment(s)

1. This is more applicable for an Objective than the Vision and it is considered that the Objectives are worded in enough detail in terms of biodiversity.
2. The 'Midlands' image of manufacturing and high technology corridor do not relate to the Vision. The safety aspect of the Vision is recommended to be revised. In terms of deliverability of the Vision, it is not envisaged that the Borough Council will be the only implementers of the Vision.
3. Officers agree to add historic assets and landscapes to the Vision. It is not appropriate for the Core Strategy Vision to require and deliver high ethical standards.
4. Officers note the comment.
5. That is the aim of the Vision.
6. Officers note the comment.
7. Officers note the comment.
8. The Vision already aims for a green town. It is not appropriate for the Core Strategy to refer to space for events to be held.
9. Officers agree to amend the Vision to refer to meeting needs.
10. Officers note the comment.
11. Officers note the comment.
12. 'Distinctively green' will be explained further in the Vision.
13. The sustainability appraisal collects data for indicators relating to ecology.
14. Officers consider that the Statement of Community Involvement ensures we work with appropriately with communities. Therefore it is not appropriate for inclusion in the Core Strategy Vision.
15. Officers note the comment.
16. Officers note the comment.
17. Officers note the comment.
18. Officers note the comment.
19. 'Distinctively green' will be explained further in the Vision.
20. The safety aspect of the Vision is recommended to be revised.
21. Government targets are to ensure that all residential developments are zero carbon by 2016, therefore the 2026 is fully in line with Government targets. Officers do not consider this issue to be too complex to be included in the Vision. The Glossary will make reference to both carbon neutral and zero carbon.
22. Officers note the comment.
23. Comment noted, but this does not suggest a change to the Vision.
24. The Vision refers to employment and skills.
25. It is not appropriate to refer to individual schemes in the Vision, but the Vision does refer to attractive facilities.
26. Management issues are not a matter for the Core Strategy.
27. The timescale for the Core Strategy is in line with national planning policy (PPS12 – Local Spatial Planning) of at least 15 years from adoption.
29. Officers note the comment.
30. This is not an issue to be dealt with in the Vision.
31. Officers note the comment.
32. Government targets are to ensure that all residential developments are zero carbon by 2016, therefore the 2026 is fully in line with Government targets. Officers do not consider this issue to be too complex to be included in the Vision. The Glossary will make reference to both carbon neutral and zero carbon.
33. Officers note the comment.

34. The Vision is intended to be aspirational and ambitious; in due course the Core Strategy will include a delivery framework setting out how aspects of the Vision can be achieved. Quality of life is a key aspect of sustainability; the Core Strategy is subject to a Sustainability Appraisal.
35. This would be more appropriate for the Sustainable Community Strategy.
36. The Vision already covers aspects of attractive facilities and vibrant centres.
37. Officers agree that this would be an appropriate addition to the Vision.
38. This is not suggesting anything for the Vision to incorporate.
39. Officers consider the Vision to be appropriately distinctive for Redditch.
40. Officers note the comment.
41. Officers note the comment.
42. Officers note the comment.
43. The Vision is not the appropriate place for targets. In due course the Core Strategy will include a Delivery Framework with specific targets.
44. Irrespective of location housing will require consumption of energy; however, this comment is not suggesting anything for the Vision.
45. This is a consideration when determining location of development; however, this comment is not suggesting anything for the Vision.
46. Whichever direction Redditch grows, infrastructure would need to be in place or subsequently provided, as WMRSS Para 6.24 states that "This infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development". This has no implications for the Vision.
47. Officers note the comment.
48. Officers note the comment.

Action to be taken with comment

2. Reconsider wording in the Vision relating to safety.
3. Consider inserting phrases "...and conserve its historic assets..." and "Redditch Borough will conserve landscapes deemed important" into the Vision.
9. Consider adding the phrase "Redditch Borough will be meeting the needs of all those that live in, work in and visit the Borough" into the Vision.
12. Consider inserting the phrase "by distinctively green we mean ecologically rich, environmentally friendly and sustainable with open spaces" into the Vision.
19. Consider inserting the phrase "by distinctively green we mean ecologically rich, environmentally friendly and sustainable with open spaces" into the Vision.
20. Reconsider wording in the Vision relating to safety.
21. Ensure that the Glossary makes reference to both 'carbon neutral' and 'zero carbon'.
37. Consider adding, 'attractive facilities, excellent public services and infrastructure, vibrant centres...' to the Vision.

Summary of Representations for Question 2

Question No.	2	Question Title	Will these Objectives achieve the draft spatial vision?
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URN of Consultees

001; 002; 004; 005; 006; 007; 008; 011; 014; 016; 018; 019; 022; 023; 024; 026; 028; 029; 030; 031; 033; 035; 036; 037; 038; 039; 041; 042; 045; 048; 050; 051; 052; 080; 081; 082; 084; 089; 092; 093; 096; 097. Total of 42 Respondents.

Summary of Comment(s)

1. Yes. (001) (004) (008) (014) (016) (018) (036) (039) (051) (081) (096)
2. There will always be problems due to poverty and anti-social behaviour that urban regeneration alone will not solve. (011)
3. Strategic Objective 2 states *'to ensure that all new development in Redditch Borough is carbon neutral'*. Whilst this is an admirable aim, to use the word to *ensure* may be over-ambitious and unachievable given the current difficulties in the achievement of Code level 6 of The Code for Sustainable Homes. A slightly modified aspiration would be more realistic. (026)
4. The Objectives are appropriate, the link to the themes of the Sustainable Community Strategy and the relationship to measurable targets is good. (028)
5. Objective 10 is supported as meeting the needs of all sectors of the community, including the provision of affordable housing which should remain a fundamental Objective. (029)
6. Objectives should not be rushed, with the right decisions made at the right time. (036)
7. Largely, not quite. (035)
8. No. insufficient priority is given to meeting needs and demand for housing and economic growth. The focus on sufficient housing to meet demographic needs is too narrow; the strategy needs to provide housing to support anticipated economic growth. (042)
9. Hopefully - you can but try. (002) (007) (019) (023)
10. Potential *conflicts between Objectives* e.g. some relate to protection of acknowledged interests in the Borough including high quality open spaces, distinctiveness and natural environment. Other Objectives relate to provision of homes to meet needs and a strong economic base. It is assumed that the Objectives are not listed in order of priority. Care will need to be taken to reconcile potentially conflicting Objectives. (048)
11. For the general future. (037)
12. These Objectives *will go some way to achieving targets*. (033)
13. Objectives are in conformity with the focus of the West Midlands Economic Strategy. (022)
14. There is no specific reference in the Objectives to providing a range of employment land for inward investment and to allow indigenous companies to be retained within the Borough. (022)
15. There is a need to balance the Objectives against sustainable economic development. There is a danger that the applications of these Objectives, such as ensuring new development is carbon neutral, will stifle economic growth in the Borough. (045)
16. To achieve strategic Objectives there is a need to build new, balanced and accessible communities. (031)
17. Support for the Objectives, and note that land at North West Redditch can help in achieving a number of these Objectives (3, 4, 5, 6, 10, and 11). (031)
18. Objection to Objective 2 as it is not realistic to seek to achieve this Objective throughout the period to 2026. The necessary technologies are not yet available economically to allow this to be achieved in the short to medium term. A phased or stepped approach during the plan period is a realistic and workable alternative Objective. (031)
19. If achieved, yes (watch out for flooding). (004)
20. No, because it is unrealistic. (006)
21. Objective 3 is sufficient for the purpose, is supported, and is in accordance with national policy. (030)

22. Objectives are supported, particularly Objective 10. (030)
23. Objectives are well placed to help achieve the draft spatial vision, but there are concerns with Objective 2. National policy on this is still evolving. It should be changed to "All new development moves towards carbon neutrality". (005)
24. These Objectives are an attempt to move in the right direction (024)
25. Support the Objective '*to enhance the visitor economy and Redditch's cultural and leisure opportunities*'. (089)
26. Objective 1 should include "*maintaining Green Belts at all costs*". (084)
27. Not entirely as not all citizens use the Town Centre. Most shopping happens in supermarkets. (050)
28. At the present time it appears obtainable. (051)
29. There is a strong possibility that they will. (082)
30. Only if more resources/personnel are available for enforcement and to {ensure/create} a zero tolerance {attitude/approach} in society against those breaking and bending the rules! (080)
31. Accessibility is mentioned in the vision but not in the Objectives, therefore an Objective could be included addressing the issue on improving accessibility for all. (092)
32. No, they are statements. (052)
33. Environment Agency issues have been picked up within Objectives 3 and 4.
34. It is important to protect young people to be robust enough to carry forward and implement value added elements. (041)
35. Redditch New Town had an excellent policy on natural landscape planning; this should not be lost by "new build" right up to the edge of highways and existing estates i.e. by removal of trees. (097)
36. No, it's too expensive. (038)
37. Note that the Environment Agencies issues have broadly been picked up within Objectives 3 and 4. (093)

Officers Response to comment(s)

1. Officers note the comment.
2. Officers accept that the planning system alone cannot resolve problems of poverty and anti-social behaviour, but can play a significant role in reducing crime, anti-social behaviour and fear of crime. For this reason, this is an Objective.
3. The targets to achieve Code for Sustainable Homes level 6 by 2016 are a national requirement which the Core Strategy will seek to deliver. It is therefore considered that the wording of the Objective is appropriate.
4. Officers note the comment.
5. Officers note the comment.
6. The Core Strategy is to run until 2026. The Vision and Objectives are long term aspirations to be achieved through the life of the Core Strategy.
7. Officers note the comment.
8. Officers accept that Objective 11 can be strengthened to include reference to sufficient employment land.
9. Officers note the comment.
10. There is a need to balance accommodating development with protecting open space, distinctiveness and the environment. A Sustainability Appraisal considers environmental, economic and social matters. The Sustainability Appraisal accompanying this Core Strategy will include a matrix testing the compatibility of Objectives. Where conflicts have been predicted, appropriate mitigation measures for the Core Strategy to implement are also suggested in the Sustainability Appraisal. The Sustainability Appraisal has predicted that there will be no significant conflicts between the Objectives.
11. Officers note the comment.
12. Officers note the comment.
13. Officers note the comment.
14. Officers accept that Objective 11 can be strengthened to include reference to sufficient employment land.

15. There is a need to balance accommodating development with protecting open space, distinctiveness and the environment. A Sustainability Appraisal considers environmental, economic and social matters. The Sustainability Appraisal accompanying this Core Strategy will include a matrix testing the compatibility of Objectives. Where conflicts have been predicted, appropriate mitigation measures for the Core Strategy to implement are also suggested in the Sustainability Appraisal. The Sustainability Appraisal has predicted that there will be no significant conflicts between the Objectives.
16. This is more appropriate for the Vision rather than an Objective.
17. Officers note the comment.
18. Government targets are to ensure that all residential developments are zero carbon by 2016; therefore the 2026 is fully in line with Government targets. Officers do not consider this to be too unrealistic as an Objective.
19. Officers agree that reference could be made to flooding in Objective 3.
20. Officers note the comment.
21. Officers note the comment.
22. Officers note the comment.
23. The targets to achieve Code for Sustainable Homes level 6 by 2016 are a national requirement which the Core Strategy will seek to deliver. It is therefore considered that the wording of the Objective is appropriate.
24. Officers note the comment.
25. Officers note the comment.
26. Green Belt does not link well with Objective 1 which only refers to open space. The RSS Phase II Revision Draft Preferred Option (Dec 2007), states in spatial strategy Objective d "to retain the Green Belt but to allow an adjustment of boundaries, where exceptional circumstances can be demonstrated". It is not appropriate for the Redditch Borough Core Strategy to repeat Objectives from higher level strategies; therefore, there is no need for an Objective regarding Green Belts.
27. National Planning Policy has an Objective of promoting vital and viable town centres and the Core Strategy has attempted to expand on this through Objective 9. The supermarkets in Redditch Borough are not in as sustainable locations as the town centre and district centres.
28. Officers note the comment.
29. Officers note the comment.
30. The Core Strategy Delivery Framework will set out how the Objectives will be achieved.
31. Officers agree accessibility should be included in the Objectives.
32. Officers note the comment.
33. Officers note the comment.
34. It is unclear exactly what this means. It is assumed that the respondent wants young people to implement the Objectives. The Delivery Framework will set out how the Objectives will be delivered.
35. Officers agree that landscaping is an important part of Redditch's distinctiveness. This correlates with Objective 4.
36. The Core Strategy must contain objectives to meet its vision.
37. Officers note the comment.

Action to be taken with comment

8. Consider changing Objective 11, inserting reference to sufficient employment land as follows "To have a strong, attractive and diverse economic base **with sufficient employment land** and employees with higher skills levels"
14. Consider changing Objective 11, inserting reference to sufficient employment land as follows "To have a strong, attractive and diverse economic base **with sufficient employment land** and employees with higher skills levels"
16. Consider inserting reference to new balanced and accessible communities in the Vision.
19. Consider inserting reference to flooding in Objective 3 as follows "To reduce the causes of, minimise the impacts of and adapt to climate change **especially flood risk**"
31. Consider inserting "improve accessibility" to Objective 6 as follows " To move towards safer, sustainable travel patterns, **improve accessibility** and reduce the need to travel"

Summary of Representation for Question 3

Question No.	3
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Question Title	Can you think of any changes to these Objectives to make them measurable or more like targets?
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URN of Consultees

001; 002; 003; 004; 006; 007; 008; 011; 012; 016; 027; 029; 030; 033; 035; 037; 038; 039; 040; 041; 042; 045; 049; 052; 080; 081; 082; 084; 088; 090; 091; 092; 094; 096; 097. Total of 35 respondents.

Summary of Comment(s)

1. More emphasis should be put on public transport. (016)
2. More emphasis should be put on the protection of wildlife (016)
3. New Objective to reduce zoning so that shops can be closer to factories and save car use. (011)
4. Each Objective should have a target with a cost plan. (003) (084)
5. Please change Objective 6 to "To increase the use of sustainable transport and reduce the need to travel especially by private car." (027)
6. An Objective could be added to reduce anti-social behaviour through the education of young people and their parents. (008)
7. Regular monitoring of the progress in meeting the Objectives should take place. Indicators i.e. those in the AMR, allow success of policies to be measured and approach amended accordingly. It is important that such indicators are measurable against clearly stated targets, allowing measurements to be taken on an annual basis. (029)
8. A bit of underdevelopment, we are closing and demolishing schools that will be needed. (035)
9. The Council is responsible for this. (012)
10. Identify a projected level of economic growth and a scale of housing provision required to meet that growth; annual housing requirements. (042)
11. Covered pretty much everything, very comprehensive but not easily absorbed (007)
12. More green spaces. (037)
13. Need to be more conscious of Redditch people. (038)
14. Crime – there are statistics available from the police. (039)
15. Transport – statistics are needed on journey types (039)
16. Economy – need information of the number of new businesses and employment figures (039)
17. Objective 1 - Ensure open spaces of environmental value are preserved, so 4) I guess. (040)
18. Objective 2 - Positive to low carbon economy (i.e. they offer more energy than they took to produce) (040)
19. Objective 6 - Emphasise cycling, walking and public transport, perhaps more.
20. Provide strict boundaries prior to construction. (033) (040)
21. It is unclear if the question here refers to the Strategic Objectives on page 22 or the Objectives in table 23-23. (049)
22. It is suggested in relation to Strategic Objective 3 and associated Objectives in the table that the County climate change strategy which is currently being reviewed will be able to provide more locally specific Objectives as well as targets for carbon reduction. (049)
23. There should be an additional Objective or rewording of an existing comment, as there is no mention of landscape character, local distinctiveness or biodiversity. Suggested amendment is "*To maintain and support local landscape character and distinctiveness while allowing appropriate land use change*", this wording should also be inserted into Page 23 under "A better environment for today and tomorrow" and page 24 under "improving health and well-being". (049)

24. Suggest Objective 1 is reworded as, "To have high quality and biodiverse open spaces, a key component of Redditch Borough". (049)
25. Suggest Objective 2 is reworded as, "To ensure that all development on Redditch Borough is carbon neutral and maximises opportunities for retention of existing and development of new opportunities for wildlife". (049)
26. Objectives 3, 4, 5, 6, 8 and 10 risk a repetition of national policy and could be usefully reworded to better reflect local circumstances. (049)
27. A welcomed addition to the Objectives would be the pursuit and routine incorporation of ecologically advantageous building technologies for example green (and 'brown' i.e. pebble/aggregate etc.) roofs, living walls, bat lofts, opportunities for breeding birds, and permeable surfaces etc. (049)
28. Support changes to the Objectives that make them more measurable. With a view to setting targets, it is questioned as to whether the baseline data exists to enable targets to be realistically set. (049)
29. A measure of biodiversity losses and gains could be utilised/ developed. Such a measure would take into account the irreplaceability of certain semi-natural habitat types, whilst measuring losses of replaceable habitats, and gains of quality and ecologically robust replacement habitats. (049)
30. A target for incorporation of 'ecological' building technologies could usefully be explored. (049)
31. Objectives should take full account of the need for the Core Strategy to identify sufficient land to meet housing targets up to 2026. (045)
32. Acknowledge the inclusion of Objective 10 relating to housing delivery; however the Objective should make specific reference to the amount of housing development required, in light of the review of Regional Spatial Strategy for the West Midlands. This Objective should also take account of the need to identify suitable and sustainable sites adjoining urban areas. (045)
33. Monitor the need for homes, affordable and otherwise, through estate agents and compare with dwellings of all types. (004)
34. Set targets for 1, 5, 6, 10 and 11. (006)
35. Education - school exam results to improve to above national averages. (001)
36. Median house prices to rise to, at least, the national average. (001)
37. Average earning per resident to rise to at least, national average. (001)
38. Most people in Bordesley want a bypass - you want good, safe access to Redditch. (002)
39. Identify a projected level of economic growth and a scale of housing provision required to meet that growth; annual housing requirements. (042)
40. The Objectives should have measurable outcomes to be included in the AMR. At the least, Objectives should be linked to policies in Core Strategy, which should be measurable. (030)
41. Increasing the Active People Score, this is measured annually. (082)
42. Supportive of Objective under heading '*communities that are safe and feel safe*'. But need to add '*To reduce crime and anti-social behaviour and the fear of crime* through visible, effective and community-friendly policing to help ensure a sustainable community is created and perpetuated in Redditch.' This ensures the Objective is in line with advice from Department of Communities and Local Government. (091)
43. Objective 2. New Developments: When does this begin for Redditch? How about Jan 1st 2009? (080)
44. Objective 8. Comment: One way of creating an illusion that crime and antisocial behaviour is getting less is by manipulating the recording and the statistics. Therefore to make this particular Objective more measurable (and honest) would be to ensure that ALL crime and antisocial behaviour is recorded properly by the police and others – then the data is processed properly. This will require extra personnel and resources. (080)
45. Objective 9. Does this mean that in some areas there will be light pollution? (080)
46. Encourage improvements to public transport provision to areas such as Webheath. Measurable targets could be frequency, number of services and usage. Not clear why context document (page 54) states that rail transport is not an issue to be considered in the Issues and Options Document. (092)
47. Should look towards supporting business, as this leads to a vibrant town. (052)

48. Support the inclusion of Objectives 1-4 in particular. However, given that the Vision makes reference to ecological richness, it would be helpful to include a specific mention of biodiversity enhancement, perhaps in Objective 4. This would be in line with (but not repeat) guidance in PPS9 and the Council's duty to have regard to biodiversity under section 40 of the Natural Environment and Rural Communities Act 2006. (090)

49. Changes that would help to make the Objectives more measurable include reference to nationally adopted indicators including N197 on biodiversity, Natural England's ANGST targets on Accessible Green Space, and commentary on the protection and enhancement of SSSIs and Special Wildlife Sites. It may however be more appropriate to include these measures and any associated targets in a monitoring chapter rather than attempting to fit them within the rather tight framework of the overarching Objectives. (090)

To make this Objective more measurable, reference could be made to English Nature's Accessible Natural Greenspace Standards (ANGST). ANGST are government endorsed Natural England greenspace standards, developed by English Nature. RPG 11 (2004) provides information on these in its appendices (ODPM September 2002). Reference to these standards would help to ensure that open space provision includes natural areas. High quality natural greenspace has the potential to contribute to all elements of sustainable development, including biodiversity and health and well being. As such, this is relevant to both the "Improved Health and Well Being" and "A Better Environment for Today and Tomorrow" themes of the SCS. (090)

50. Do not agree with 'targets' – just make it easier for people to complain and/or praise. (081)

51. In the light of the focus on urban renaissance in the Region and economic growth in the Redditch Sub-Region, and having regard to demonstrating deliverability throughout the LDF process, it is considered that Objectives 5, 10 and 11 (in that order) should be prioritised. Objective 5 is consistent with the thrust of emerging Phase Two Revision of RSS11, as is Objective 10. (096)

52. The recognition of the importance of high quality open spaces given in Strategic Objective 1 is welcomed. Redditch's distinctive 'new town' layout incorporates a high proportion of open space which should be maintained and enhanced. As well as offering opportunities for recreation, open space can provide a valuable habitat for wildlife and provides many ecosystem services such as urban cooling. As such open space is important for the overall green infrastructure of Redditch, providing an important, multifunctional space and acting as an interface between the urban and natural environments. (088)

53. Strategic Objectives 2, 3 and 4 are supported. (088)

54. It is important to recognise that the 'adaptation' element of Strategic Objective 3 applies to the natural environment as well as to humans. Species and habitats need 'room to adapt' in order to ensure their survival. (088)

55. The natural environment provides many services without which, we could not survive. It provides us with food and soils in which to grow this, and the raw materials and energy to maintain our modern standards of living. It also provides many ecosystem services such as water purification and climate regulation. These services underpin our own existence. Habitats and species need room to adapt to climate change. Increasing the size of habitats can help to buffer a site from edge-effects, preserving a central 'core' in which species can survive or flourish. Increasing connectivity by linking-up sites allows species to move through the landscape to expand their population range, increase their numbers, or move to more suitable areas as their existing area changes, increasing resilience and ability to adapt to climate change. Green Infrastructure Planning (GIP) is fundamental to achieving this. Green infrastructure includes everything from street trees through to designated sites, with connectivity and multi-functionality key concepts. The planning-in of GI from the beginning can ensure that the ability of species to adapt is not undermined by, or is even enhanced by future development. (088)

56. These issues could be monitored through achievement of relevant targets under the Worcestershire Biodiversity Action Plan (BAP), and through use of GIS mapping and/or aerial photography. (088)

57. Although the protection and enhancement of biodiversity is implied within Objectives 1 and 4, this is not made explicit. Given the priority of 'greening' the Borough, as made clear by the Spatial Vision and its inclusion of ensuring that the Borough is "ecologically rich", it is recommended that this priority be made more overt within the Objectives; this would help to ensure delivery of the Spatial Vision.

58. Concentrate new development solely in Arrow Valley (041)

59. *'To move towards safer, sustainable travel patterns and reduce the need to travel'* – this Objective should be expanded to include *'by developing employment sites in locations which are accessible by sustainable modes, including walking, cycling and passenger transport and where these modes can offer a realistic alternative mode of travel to the private car.'* (094)

60. Explain to residents what is meant by "carbon neutral", i.e. in the form of alternative technology and renewable forms of energy that they can use themselves. (097)

Officers Response to comment(s)

1. Objective 6 already makes reference to sustainable travel which includes public transport.
2. To protect, promote and enhance the natural environment is included in Objective 4. The natural environment includes habitats, wildlife, flora and fauna, which are considered to be aspects of Biodiversity. Officers agree there should be more clarification with reference to the definition of natural environment in the glossary.
3. National planning guidance encourages mixed uses; therefore zoning will not be appropriate for the Core Strategy.
4. This will be set out in the Delivery Framework. Monitoring will take place through the AMR.
5. The Core Strategy cannot increase the use of sustainable transport and can only offer encouragement. Officers do not consider that the insertion of "especially by private car" would add anything to the Objective because the aim is to reduce the need to travel by all modes.
6. This is already included in Objective 8.
7. This will be set out in the Delivery Framework. Monitoring will take place through the AMR.
8. It is unclear how this can relate to any of the Core Strategy Objectives.
- 9.. Officers note the comment.
10. The RSS will provide this information for the Redditch Borough Core Strategy.
11. Officers note the comment.
12. The Open Space Needs Assessment will provide evidence for the Core Strategy in terms of the level of provision of green space.
13. Officers consider that the Statement of Community Involvement ensures we work appropriately with communities.
14. Officers note the comment.
15. Officers note the comment.
16. Officers note the comment.
17. Objective 1 and 4 are better suited as separate Objectives as they deal with separate matters.
18. This Objective is too onerous to have in the Core Strategy.
19. This is already sufficiently incorporated into Objective 6.
20. Officers interpret this to refer to targets being achieved. Where appropriate policies in the Core Strategy and Delivery Framework will set out targets for developments.
21. The Objectives listed on both pages are the same.
22. Officers note the comment.
23. Officers agree that a new Objective should be inserted. It is not considered appropriate to include land use change into the Objective because there is appropriate reference in Objective 10 and 11.
24. To protect, promote and enhance the natural environment is included in Objective 4. The natural environment includes habitats, wildlife, flora and fauna, which are considered to be aspects of Biodiversity. Officers agree there should be more clarification with reference to the definition of natural environment in the glossary.
25. To protect, promote and enhance the natural environment is included in Objective 4. The natural environment includes habitats, wildlife, flora and fauna, which are considered to be aspects of Biodiversity. Officers agree there should be more clarification with reference to the definition of natural environment in the glossary.

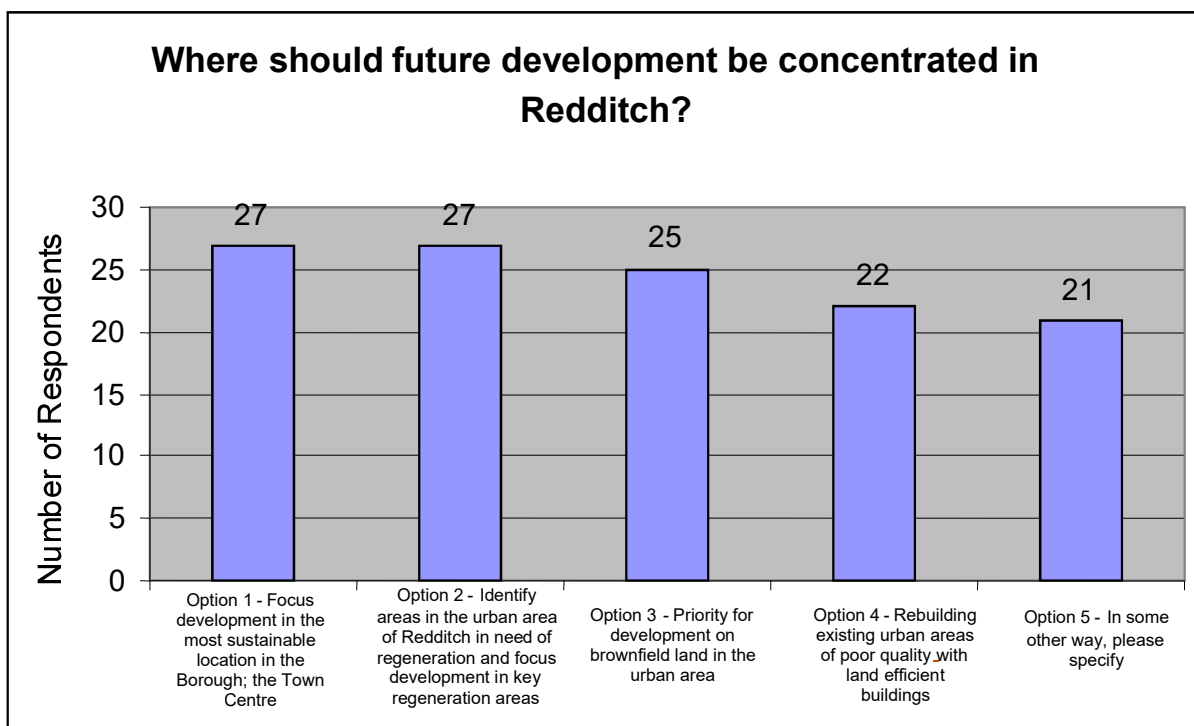
26. Officers consider Objective 5 is unnecessary as it repeats national policy.
27. These elements are too detailed for mention in the Objectives, and would be more appropriate for inclusion in policies.
28. Targets for the Objectives will be included in the delivery framework in the Core Strategy.
29. There are indicators to measure Biodiversity losses. This is too detailed for an Objective.
30. Objective 2 is a related Objective to this comment, however more detail is usually provided elsewhere in the Core Strategy e.g. policies or Delivery Framework.
31. Objective 10 makes reference to meeting demographic needs. By fulfilling Redditch's needs, sufficient land would be provided for through the Core Strategy. Officers consider amending the Vision to refer to meeting needs.
32. Core Strategies are required to be flexible; therefore it is not appropriate for Objective 10 to refer to the figure in the RSS Draft Preferred Option. Reference to the need to identify sustainable urban extensions is not appropriate for inclusion in this Objective and will be provided elsewhere in the Core Strategy.
33. Housing need is identified through the South Housing Market Area Assessment, which during its preparation consults with estate agents.
34. Setting targets in more detail is usually provided elsewhere in the Core Strategy e.g. policies or delivery framework with specific reference to Objective 1, 5. It is not feasible to set a target for Objective 6, as achievement of this Objective cannot be fully controlled by planning; also indicators and monitoring are not substantial enough to set realistic targets. With reference to Objectives 10 and 11, these targets are set by the RSS.
35. Achievement of this comment cannot be fully controlled by planning.
36. House prices are not controlled by planning. This target is unrealistic because the Core Strategy can only provide for what the RSS target is set as; it is unclear whether this target will stabilise house prices.
37. Achievement of this comment cannot be fully controlled by planning.
38. This is not suggesting a change to an Objective. Specific reference to infrastructure schemes is not appropriate to include in an Objective.
39. These targets are set by the RSS.
40. Officers agree that the Objectives will be linked to targets in the Delivery Framework.
41. This could be a target to be used in the Delivery Framework, rather than included in the Objectives.
42. Reference to a 'Visible, effective and community policing' is not appropriate for an Objective as this is not a spatial planning function. Reference to a 'sustainable community' is more appropriate to be included in the Core Strategy Vision rather than as an Objective.
43. The planned adoption date for the Core Strategy is February 2011. Until then, requirements for carbon neutral developments can be guided by regional and national planning policy.
44. This is not a spatial planning matter.
45. This Objective does not correlate to increases in light pollution in the Borough.
46. This is already included as part of Objective 6, but not specifically Webheath. The targets suggested will be considered when producing the Delivery Framework. The context document states that rail transport was not appropriate to be considered in the Issues and Options document because there are limited alternative planning policy options, this does not preclude its inclusion in later stages of the Core Strategy preparation.
47. By implication, Objective 11 supports businesses.
48. To protect, promote and enhance the natural environment is included in Objective 4. The natural environment includes habitats, wildlife, flora and fauna, which are considered to be aspects of Biodiversity. Officers agree there should be more clarification with reference to the definition of natural environment in the glossary.
49. Officers agree and will look into these indicators.
50. Objectives must be measurable through a delivery framework where targets are required.
51. All of the Objectives are equally important to deliver the Vision.
52. Officers note the comment.
53. Officers note the comment.
54. Officers note the comment.
55. Officers note the comment.

56. Officers note the comment.
57. To protect, promote and enhance the natural environment is included in Objective 4. The natural environment includes habitats, wildlife, flora and fauna, which are considered to be aspects of Biodiversity. Officers agree there should be more clarification with reference to the definition of natural environment in the glossary.
58. This is not recommending any changes to the Objectives.
59. This Objective should apply to all development not just employment. As a result of earlier comments Objective 11 is recommended to be changed to include reference to employment needs.
60. Officers agree that definition of carbon neutral and zero carbon should be included in the glossary.

Action to be taken with comment

2. Consider inserting a definition of 'natural environment' into the Glossary.
5. Consider changing Objective 6 to "Encourage" rather than move towards to read as follows "To **encourage** safer, sustainable travel patterns, improve accessibility and reduce the need to travel".
23. Consider inserting a new Objective "***To maintain and support local landscape character and distinctiveness***".
24. Consider inserting a definition of 'natural environment' into the Glossary.
25. Consider inserting a definition of 'natural environment' into the Glossary.
26. Consider deleting Objective 5.
31. In the Vision, consider adding the phrase "Redditch Borough will be meeting the needs of all those that live in, work in and visit the Borough."
42. Consider inserting "sustainable community" in the Vision. Vision to read "By 2026, Redditch Borough will be a distinctively green sustainable community..."
48. Consider inserting a definition of 'natural environment' into the Glossary.
49. Consider whether the targets suggested should be included in the Delivery Framework.
61. Consider including definitions of 'carbon neutral' and 'zero carbon' in the glossary.

Response to Question 4



Summary of Representations for Question 4 Option 5

Question No.	4
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Question Title	Where should future development be concentrated in Redditch Borough? <i>Option 5 – in some other way, please specify</i>
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URN of Consultees

004; 005; 007; 012; 016; 017; 027; 028; 029; 030; 031; 035; 041; 042; 048; 049; 050; 080; 088; 090; 091; 093. Total of 21 Respondents.

Summary of Comment(s)

1. Not necessarily in brownfield sites, as these are sometimes important wildlife sites. (016)
2. Change of use for renovation of existing buildings for residential purposes. (017)
3. It would have been better to set out Redditch's development requirements for housing and employment land at this stage rather than list them in the topic areas elsewhere in the document. (028)
4. Support the development strategy. (027)
5. Brownfield and infill sites should be used first, followed by greenfield land located adjacent to existing settlement. (029)
6. Regenerate existing town. (035)
7. Build outside Redditch boundary. (035)
8. Don't use green belt land, it is needed for food. (012)
9. Deliverable Greenfield land adjoining Redditch urban area. (042)
10. Option 4 - more allotments. (007)

11. None of the options 1 to 4 can be relied upon as the sole means of delivering development to meet the town's needs. A hierarchy should be established which focuses appropriate development in the town centre, and promotes the use of Brownfield land in preference to greenfield land in the urban area, allowing development on greenfield land within the urban area to meet Redditch's needs. (048)
12. Landscape Sensitivity and Visual Assessment work being undertaken by the Strategic Planning and Environmental Policy team at the County Council will contribute towards helping to ensure that future development be located in a manner that is sensitive to the landscape. (049)
13. Option 1 refers to the 'most sustainable' locations - but appears to only get 1 score in the sustainability appraisal column, this is an anomaly. (049)
14. It is not possible to determine whether Option 3 might be a preferable / viable option in the absence of adequate natural environment data and analysis. For example, what is the biodiversity importance of the available Brownfield land and how does this compare with the biodiversity importance of available greenfield options. (049)
15. Due to high amount of housing needed following RSS and the fact that Redditch is a New Town and has limited capacity for additional housing, development should be concentrated on land north west of the Borough as this is large enough to accommodate 6,600 units. (030) (031)
16. The ADR land south east of Redditch is not appropriately configured or located for the construction of a sustainable community. (030) (031)
17. Option 4 is rather like Option 2. (004)
18. Community building and greenfield sites i.e. in ADRs make sure adequate infrastructure and community facilities are in place. (004)
19. The core strategy should make provision for major additional housing growth (to be in conformity with RSS). (030)
20. In order to meet PPS 12 soundness test, to be justified, effective and consistent, the development strategy must have a combination of options in Q4. (030)
21. The footnotes of Table 1 of the WMRSS state that the 'Redditch figure of 6,600 includes 3,300 in Redditch and 3,300 adjacent to Redditch town in Bromsgrove and/or Stratford upon Avon Districts'. A comprehensive approach with neighbouring boroughs would allow a more holistic strategy for the location of development. All 4 options proposed focus development in the Redditch urban area. These options are suitable for the 3,300 dwellings but do not consider the further 3,300. Further joint options need to be considered including land to the north of Redditch, north of Dagnell End Road. This is a suitable location for a Sustainable Urban Extension; an option supported by the sites identified potential in the White Young Green joint study. (005)
22. Don't forget the villages e.g. Hunt End. (050)
23. The obvious place to add development is near existing railway stations in order to encourage commuting by rail. (011)
24. There are derelict industrial buildings adjacent to the town centre. (011)
25. Space left over after planning - large areas of grassland by roadsides serving no amenity purpose that could be developed. (011)
26. Green areas not used by tenants such as the rear of Oxhill Close, Matchborough that could take more living units. (011)
27. There are large areas devoted to garages with potential for redevelopment with parking below. (011)
28. Use present land and facilities more intensely than have more urban sprawl. (011)
29. High density, low rise properties with just enough garden provision is the way forward. (011)
30. Focus development in the most sustainable locations (plural) in the Borough not just the Town Centre. (080)
31. Would prefer to see development concentrated in a small number of locations rather than scattered across a wide area. This is because the scale of development required supporting Police infrastructure for a dispersed built environment pattern would be excessive, and at the least would create locations that would be on the fringe of response times. (091)

32. Play areas that have been undesignated should be redeveloped. (011)
 33. SFRA and water cycle study should inform how future growth will be distributed. (093)
 34. Combine options 1-4 with the following caveats.

- Environmental protection and enhancement must be a central plank of all future development options.
- Options for future development must be based on up-to-date ecological information, respect environmental limits, take account of climate change and consider wider sustainability criteria such as sustainable transport infrastructure, energy generation and opportunities for creative master planning to promote a more sustainable built environment.
- All development options must include space for the creation of Green Infrastructure and look to rebuild fragmented ecosystems for the benefit of biodiversity and the local community. (090)

35. Support an Option which saw growth located in the most sustainable location. It should be noted that the most sustainable option may not always be the most obvious choice. No single Option is likely to be capable of meeting the Borough's development needs in a sustainable way, and that there are risks and opportunities inherent in all of the Options. In all cases sites would have to be considered on a strategic and a site-by-site basis. The location of development should be very carefully considered and fully informed by the evidence gathered. (088)

36. Arrange development to provide 'critical mass' to trigger a new railway station in Arrow Valley. (041)

37. The Strategic Road Network should be a key determinant when considering appropriate development locations at Matchborough as this is close to the A435, the link road to the M42. This should include the production of robust Transport Assessments and Travel Plans. (027)

Officers Response to comment(s)

1. Sites of wildlife importance would be protected through other means. However, priority for brownfield sites to be developed in preference comes from national planning policy – Paragraph 36 of PPS3 states that “The priority for development should be previously developed land”.
2. Officers accept the principle of reuse of existing buildings for all purposes but would be considered on its merits. It is not considered that re-use of buildings will be enough to satisfy future development requirements.
3. Officers note the comment.
4. Officers note the comment.
5. Officers agree with brownfield priority and Greenfield land comment however all development is likely to be accommodated within existing settlements (with the exception of Sustainable Urban Extensions). With regards to infill development, this is not considered to be part of the development strategy, but is likely to be included within the Core Strategy.
6. Officers agree.
7. This is not considered to be an appropriate response because the Core Strategy relates solely to land within Redditch Borough.
8. It is not envisaged that this land will be required for future development to meet Redditch's proportion of the RSS strategic targets.
9. All development is likely to be accommodated within existing settlements (with the exception of Sustainable Urban Extensions).
10. Existing allotments are identified in the Open Space Needs Assessment and protected through the Core Strategy. The Scoping Report has identified that in comparison to other districts, Redditch has a larger proportion of allotments. In any case allotments are considered to be too specific to refer to in the development strategy.
11. Officers agree that this could be a viable approach.
12. Officers agree.
13. Officers agree that this is an anomaly and should be considered as a “+ +” score.
14. Biodiversity importance is assessed in terms of designations for SSSIs, SWS, LNR which must be considered in the identification of suitable sites.

15. At this stage the Redditch Core Strategy does not have to accommodate 6,600 dwellings. The RSS housing target established through the Phase Two Revision Preferred Option Document sets Redditch a target of 3,300 dwellings. Land outside the administrative boundary of Redditch Borough cannot be included within this development strategy.
16. The alternative approaches for this parcel of land will be presented in the Preferred Draft Core Strategy.
17. Officers note the comment.
18. Whichever direction Redditch grows infrastructure would need to be in place or subsequently provided, as the WMRSS Para 6.24 states that "This infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development".
19. Officers note the comment.
20. Officers note the comment.
21. It is considered that Redditch Borough can only accommodate its proportion of the RSS targets. A Core Strategy for each District (Redditch, Bromsgrove and Stratford-on-Avon) is being progressed because there are political constraints to achieving a joint Core Strategy. In order to ensure that the development targets to meet Redditch's needs are met in a comprehensive and sustainable manner, the three Authorities continue to work closely with one another in progression of individual core strategies. It is also envisaged that joint studies will recommend the locations for future growth in a comprehensive manner which all Core Strategies are likely to have regard to. The RSS is likely to consider allocating each District its proportion of the growth, thus helping the progression of each Core Strategy.
22. The settlement hierarchy is likely to state that Redditch town is the most sustainable town in which to accommodate the majority of the growth. Astwood Bank is also likely to be classed as a sustainable rural settlement. In terms of the development strategy the villages are therefore not expected to be the focus for development and are not appropriate for inclusion.
23. This is considered as part of Option 1.
24. This is considered as part of Option 2 or Option 4.
25. Areas such as this have been picked up through the SHLAA and will be assessed for development potential.
26. Areas such as this could probably take additional dwellings but this site for example, falls below the site size threshold for the SHLAA study. This should not preclude the owner of any small site (less than 0.15ha) from pursuing planning consent.
27. It is considered that this is too specific to include in the development strategy.
28. Officers accept the principle of reuse of existing buildings for all purposes but would be considered on its merits. It is not considered that re-use of buildings will be enough to satisfy future development requirements.
29. Density is not considered to be part of the development strategy but is likely to be included within the Core Strategy.
31. Scattering development across a wide area is not considered to be a sustainable option.
30. Officers agree.
32. Areas such as this have been picked up through the SHLAA and will be assessed for development potential.
33. Officers agree.
34. Officers agree that this could be a viable approach.
35. Officers agree.
36. It is considered that this is too specific to include in the development strategy.
37. Transport is a key determinant when considering appropriate development locations as part of the SHLAA and the Employment Land Review. SHLAA will consider access to public transport and walking distances to facilities such as schools, retail and health facilities.

Action to be taken with comment

None

Summary of Representations for Question 5

Question No.	5	Question Title	Do you have any comments on the likely settlement hierarchy of Redditch Borough?
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URN of Consultees

001; 002; 004; 005; 011; 016; 024; 029; 030; 031; 035; 039; 045; 048; 050; 088; 093; 096; 097.
Total of 19 respondents.

Summary of Comment(s)

1. Development should be kept in the Town Centre. (016)
2. Urban sprawl should be reduced. (011)
3. Strategy is supported. However it is important that sufficient housing is delivered in rural locations where housing delivery is lower and the problem of affordability is higher.
4. Exceptions to the settlement hierarchy should be made for sites for 100% affordable housing adjacent to the settlement boundary necessary to address a demonstrated affordable housing need. (029)
5. Depends on financial situation and quality of persons carrying it out. (035)
6. Focus appropriate development in the Town Centre and promote the use of Brownfield land in the urban area but be flexible to allow greenfield development to meet Redditch's needs. (048)
7. Feckenham could have some commercial development; this would reduce travel to Redditch and Astwood Bank. (039)
8. Should fully consider and assess the amount of development required in terms of the housing requirements to 2026 in light of the review of RSS11. Webheath provides an opportunity to create a sustainable urban extension in a suitable location, which avoids the need to develop on Green Belt land and can contribute to the strategic allocation for housing provision. (045)
9. The strategy must focus development on Redditch with limited development at Astwood Bank and restraint at Feckenham. (031)
10. No, agree with officer's estimate but urge caution with Astwood Bank. Very narrow old roads, over use of A441 through the District Centre and possibility of development causing more on adjacent low lying areas. (004)
11. What does this mean - avoid jargon. (001)
12. Settlement where the main facilities are found with good quality, punctual public transport between them.(002)
13. It is unlikely the settlements of hierarchy will change. (030)
14. Redditch should be the primary focus of development within the borough and lead the settlement hierarchy of the Borough. It is important that Redditch is considered as the complete Town and not just the urban area within its administrative boundary. (005)
15. Areas on the outskirts of the urban area should be included at the top of the settlement hierarchy. (005)
16. Agree with settlement hierarchy. (024)
17. Hunt End is not mentioned. (050)
18. SFRA and water cycle study should inform how future growth will be distributed. (093)
19. Redditch's main urban area ranks highest in terms of sustainability criteria and on this basis it should be the focus of development. (096)
20. The roads of Astwood Bank (including A441) are not capable of sustaining current housing development, let alone any future enlargement, similarly in Feckenham. (097)
21. Supports the use of a development hierarchy where preference is given to Brownfield land this is only true where Brownfield land is not of value for biodiversity and/or as open space. It should be noted that development of Brownfield land in preference to Greenfield may not always be the most sustainable option. Brownfield land can be of high biodiversity value and can also provide opportunities for provision of open space, whereas Greenfield sites could

have little value. New development needs to be carefully sited so as to ensure the most sustainable option, and any sites considered for development must be carefully judged on a site-by-site basis. (088)

Officers Response to comment(s)

1. This is more appropriate for the Development Strategy.
2. Officers agree with the principle that Urban sprawl should be reduced; however, this is not related to the Settlement Hierarchy.
3. Officers agree this is a viable option.
4. Officers agree this is a viable option.
5. This is not an appropriate response.
6. This is more appropriate for the Development Strategy.
7. Officers agree this is a viable option.
8. The need to consider and assess the amount of development required as a result of the WMRSS is a viable approach for the Core Strategy; the alternative approaches for this parcel of land will be presented in the Preferred Draft Core Strategy.
9. Officers agree this is a viable approach, as set out in the Issues and Options Document.
10. Officers note the comment
11. Officers consider it may be appropriate to include the definition of settlement hierarchy to the Glossary.
12. Officers note the comment
13. Officers note the comment
14. Redditch as a settlement is just the Town i.e. the urban area and should not be considered as the whole area of the Borough.
15. Redditch Core Strategy can only consider land within its administrative boundary.
16. Officers note the comment
17. Hunt End is not considered to be a settlement in its own right.
18. Officers note the comment
19. Officers note the comment
20. Officers note the comment

Action to be taken with comment

11. Consider adding the definition of settlement hierarchy to the Glossary.

Summary of Representations for Question 6

Question No.	6	Question Title	Do you have any comments to make about the hierarchy of centres?
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URN of Consultees

001; 002; 004; 017; 024; 027; 028; 030; 031; 035; 039; 041; 050; 051; 080; 084; 089; 096; 097.
Total of 19 respondents.

Summary of Comment(s)

1. If no changes are envisaged to the status or priority of the District Centres, is the definition of a hierarchy over complicating the issue. The diagram on page 28 does not necessarily illustrate intentions. (028)
2. The role of the Town Centre and District Centres should be dealt with elsewhere. (028)
3. Redditch Town Centre already privatised - not a good idea. (035)
4. Add or develop Feckenham as a District Centre. (039)
5. Given the scale of growth required at Redditch, consideration must be given to the creation of one further local centre serving a Sustainable Urban Extension. There is an opportunity at North West Redditch for this. (030) (031)
6. District Centres need to be more open to passing traffic/trade and better signed to attract non-locals if they are to compete with supermarkets. (004)
7. Hierarchical on the centre of Redditch. (002)
8. The Town Centre should be the prime area for consideration and development. (024)
9. All district centres should be on a level playing field (equal). (024)
10. Cultural, leisure and tourism facilities that are likely to attract large numbers of visitors should in the first instance be clustered within Redditch Town Centre and have good accessibility to the public transport network. (089)
11. It will be appropriate for the smaller district centres to provide entertainment, leisure and cultural facilities of an appropriate scale and kind to serve their roles and catchments. (089)
12. Concentration of cultural facilities and activities in the main town centre can act as a magnet for visitors and provide a significant boost to the local economy. Cultural services and tourism are inter-dependant, with tourists attracted by museums, theatres, heritage sites, arts, sport, entertainment venues, festivals and events. (089)
13. The total redevelopment of the older areas of Batchley should be of prime importance, thus removing the area from the top quartile of deprived areas nationally. That we have such a deprived area in Redditch is a scandal. (084)
14. Dislike the idea of a hierarchy. (050)
15. Crabbs Cross' recent growth requires consideration. (051)
16. The diagram suggests that Astwood Bank has less importance than Headless Cross, and it suggests that Matchborough is more important than Woodrow. The text says that no centre takes precedence over any other. (080)
17. The hierarchy is supported. The availability of major development sites is a critical element in refining the approach to locating development. The proximity of such sites to the Town Centre and District Centres is a further important influence on location, as it provides opportunities for achieving the highest levels of accessibility. (096)
18. There is a very strong emphasis on demonstrating deliverability and PPS12, paragraph 1.3 expects LDFs to promote a proactive, positive approach to managing development. Part of this approach is demonstrating the soundness of development plan documents, which must be based upon a robust and credible evidence base. (096)
19. Seems to be a good basis for original plan. (041)
20. Where do Crabbs Cross and Hunt End fit into this hierarchy? (097)
21. Batchley has grown with the Brockhill development and therefore should be higher in the hierarchy, particularly as further development will be seen in the future with the ADR land built on. (084)
22. Vitality is sucked out by Tesco and Sainsbury's, but still could be useful given energy

shortage. (041)

23. Linear style e.g. Crabbs Cross/other, do they count? (017)

24. Avoid use of jargon. (001)

25. Matchborough is close to the A435, the link road to the M42. The SRN should be a key determinant when considering appropriate development locations here. This should include production of robust Transport Assessments and Travel Plans. (027)

Officers Response to comment(s)

1. PPS 6 (para 1.6) requires the Regional Spatial Strategy and Local Development Documents to 'develop a hierarchy and network of centres'. Officers have attempted to ensure the terminology is consistent with PPS 6 and the RSS. As the Core Strategy develops, Officers will consider this matter further.

2. Officers note the comment

3. This is not an appropriate response to the 'hierarchy of Centres'.

4. Local / District centres are defined in PPS 6, they include 'a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub post office and a pharmacy. Other facilities could include a hot food take away and laundrette. In rural areas, large villages may perform the role of a local centre.' (PPS 6 Annex A). Based on this typology, Feckenham is not considered appropriate as a local/district centre.

5. Although this may be a viable approach for the future development of Redditch, it is not applicable to include this in the Hierarchy of Centres as it is only concerned with existing centres.

6. Officers note the comment

7. Officers note the comment

8. Officers note the comment

9. This is how the District Centres were presented in the Issues and Options Document.

10. Officers agree.

11. Officers note the comment

12. Officers note the comment

13. Batchley is identified as a strategic site in the Issues and Options Document and it is likely that it will continue to be designated as such. This has no impact on the Hierarchy of Centres.

14. PPS 6 (para 1.6) requires the Regional Spatial Strategy and Local Development Documents to 'develop a hierarchy and network of centres'.

15. Officers consider that there is no information to suggest that any of the District Centres should be presented higher in the hierarchy than any other centre, including Crabbs Cross.

16. No Centre takes precedence and this can be better presented in the Core Strategy.

17. Just because there may be a number of available sites within a particular area, does not make this area a sustainable location, there are other factors. Officers agree that Town and District Centre locations are sustainable because of their accessibility.

18. Officers agree that all sites for development in the Core Strategy will be deliverable.

19. Officers note the comment

20. Crabbs Cross should be included in the Hierarchy of Centres and the Core Strategy is likely to present it as a District Centre of equal status as other District Centres. Hunt End is not a District Centre but is considered to contain parades of shops only.

21. Officers consider that there is no information to suggest that any of the District Centres should be presented higher in the hierarchy than any other centre, including Batchley. With regard to ADRs the alternative approaches for these parcels of land will be presented in the Preferred Draft Core Strategy.

22. The impact of Supermarkets on District Centres does not necessitate changes to the Hierarchy of Centres. In terms of the reference to energy shortage, it is assumed it means that they are accessible by walking rather than having to drive, and this is accepted.

23. This comment does not answer the question.

24. Officers note the comment

25. Officers note the comment

Action to be taken with comment

1. Consider terminology of 'Hierarchy of Centres'.
16. Consider the presentation of the Hierarchy of Centres diagram to reflect that there is no precedence of District Centres.

Summary of Representations to Question 7

Question No.	Question Title
7	Should there be any additional strategic sites and if so, where?

URN of Consultees

004; 005; 007; 017; 019; 024; 027; 028; 029; 030; 031; 035; 037; 041; 042; 045; 048; 051; 080; 084; 088; 092; 093; 096; 097. Total of 25 respondents.

Summary of Comment(s)

1. Highfield House, Headless Cross change of use to residential (017)
2. Crabbs Cross (051)
3. Area around train station (019)
4. The strategic sites should be assessed through the consideration of evidence including the sustainability appraisal. (028)
5. Support the ADRs, subject to them having appropriate connectivity to existing services, jobs and public transport. (027)
6. Development within A435 ADR could impact on M42 Junction 3, these developments should be sustainable. (027)
7. A balance must be struck between protection of Green Belt and provision of sufficient land to provide for the needs of the Borough. For example if there is a demonstrated need for affordable housing in a village then this should be provided via a rural exceptions site. (029)
8. Outside existing Borough boundary. (035)
9. Land to the north of Redditch (042)
10. Redditch Town Centre. (037) (042)
11. Somewhere between Astwood Bank and Batchley to cover the gap. (007)
12. Reflects advice in revised PPS12 to identify strategic sites. Supports identification of A435 ADR land as a strategic site and suggests that key diagram is modified accordingly. (048)
13. A definitive list of strategic sites should be provided confirming that the ADR sites and other identified sites form those strategic sites capable of meeting the housing and employment requirements to 2026. (045)
14. Objection is made to the assertion that Redditch Borough's Green Belt should not be considered for meeting housing needs as a matter of principle. This is not consistent with the emerging RSS that clearly requires Green Belt on the edge of the town to be assessed for accommodating planned growth. There is no logic for supporting Green Belt release in Bromsgrove and/or Stratford and resisting such release in Redditch Borough in principle. (031) (092)
15. Land North West of Redditch should be considered as a phased strategic site. Two areas of the site would be suitable for early phases of development (Brockhill East ADR). In addition the Western part of the site which falls mainly within Bromsgrove is available and can be delivered at an early phase. The remainder of the site can be delivered in subsequent phases. (030) (031)
16. Woodrow is not good and would well be included in the next phase of District Centre improvement. (004)
17. It is illogical to assert that there is no need to use the Redditch Green Belt for development. As Bromsgrove and Stratford will have to consider releasing Green Belt land, in the absence of a joint Core Strategy the three councils should embrace cross boundary thinking and welcome the opportunity to create a sustainable urban extension to the town (work in spirit of para 4.16, 4.17 of PPS 12). (030)

18. As Brockhill ADR has been identified as suitable for housing development, the creation of an urban extension should be considered to be located west and north of ADR land, on green belt land in Redditch and Bromsgrove (areas 5 & 6 Plan 1 of WYG study). This would provide an opportunity to plan a comprehensive development. (030)
19. Land north of Dagnell End road is an ideal location as a strategic site. (005)
20. These sites have been well identified. (024)
21. The ADR land in Webheath should not be designated as a strategic site, as it is unsustainable due in no small measure to the very poor road infrastructure in the area. The use of the roads has increased substantially since the last road survey in 2001 and a further survey will prove this point. (084)
22. The rear of the Alexandra Hospital should not be considered as a 'strategic site', other than its originally planned use, to improve access to Redditch from the south. (097)
23. Don't build on the land behind the hospital. Turn it into proper parkland. (080)
24. Yes, improve the Edward Street area. Make it into an urban garden park with trees, also a coach park and a town museum (not to be mixed up with Forge Mill). (080)
25. The old railway track – the cutting – just off Tunnel Drive: turn it into a proper conservation area, with safe access for the public. (080)
26. Mettis Aerospace Limited, Windsor Road, Redditch, B97 6EF (096)
27. Although it is recognised that the ADR's have been selected through the planning system, it would be prudent not to make the automatic assumption that these are the most suitable strategic sites for growth. The suitability of sites must be considered strategically and on a site-by-site basis. Examples include the strategic planning-in of high quality open space which promotes biodiversity and is in keeping with Redditch's character and the Spatial Vision, and careful choice of location so as to promote the local economy and prevent commuting in and out of the Borough. (088)
28. New railway station at Bordesley is only strategic site – bring aggregate by rail. Support passing bays on improved electric rail as requested by Walter Stranz. (041)
29. An SFRA and Water Cycle Study should be used to inform how future growth will be distributed. (093)

Officers Response to comment(s)

1. The site at Highfield House is being considered as part of the Employment Land Review. Any future allocation would need to be considered after this is completed.
2. This is not specific enough.
3. This area is already a strategic site.
4. Officers agree
5. Officers note the comment
6. Transport is a key determinant when considering the development of any land as part of the SHLAA and the Employment Land Review.
7. It is likely that Rural Exception sites are a viable option; however, this response does not suggest a strategic site.
8. The Core Strategy only relates to the administrative area of Redditch Borough.
9. If this refers to land outside Redditch to the north then, it is not possible for this area to be a strategic site in the Core Strategy as it only relates to the administrative area of Redditch Borough. If this means land within the administrative area of Redditch then this is not specific enough to be a strategic site.
10. Although the Town Centre was a strategic site within the Issues and Options Document, evidence has now been presented (through a retail and leisure needs assessment) which suggests that there is little need for the Town Centre to be a strategic site, with the exception of the Edward Street and the Church Rd site (these are strategic sites). The Town Centre is already likely to be a focus for development in the Spatial Strategy.
11. This is not specific enough; there is no focus in this suggestion for a strategic site.
12. The parcel of land at the A435 ADR will have alternative approaches presented for its use in the Preferred Draft Core Strategy; the key diagram will be modified to reflect this.
13. The strategic sites identified are not likely to meet the targets provided for Redditch to 2026 in terms of housing and employment, this is not the intention of strategic sites. It is

considered that a list of strategic sites will be provided in the Core Strategy. The alternative approaches for these parcels of land will be presented in the Preferred Draft Core Strategy.

14. There are reasons why Green Belt in Redditch Borough is considered as particularly sensitive and therefore not capable of sustainable development. Emerging RSS in effect accepts this in principle by allocating Redditch's growth to Bromsgrove and/or Stratford. Consideration of Green Belt development is therefore not appropriate in the Core Strategy in accordance with the RSS. Green Belt development in Bromsgrove and/ or Stratford is a strategic consideration for the RSS and not for this Core Strategy.

15. The Brockhill ADR is likely to be a strategic site in the Core Strategy. However, in terms of the western part of the site this is outside of the administrative boundaries of Redditch Borough and therefore cannot be considered as a strategic site in this Core Strategy.

16. Woodrow District Centre is likely to continue to be included as a Strategic Site in the Core Strategy.

17. A Core Strategy for each District (Redditch, Bromsgrove and Stratford) is being progressed because there are political constraints to achieving a joint Core Strategy. In order to ensure that the development targets to meet Redditch's needs are met in a comprehensive and sustainable manner, the three Authorities continue to work closely with one another in progression of individual core strategies. It is also envisaged that joint studies will recommend the locations for future growth in a comprehensive manner which all Core Strategies are likely to have regard to. The RSS is likely to consider allocating each District its proportion of the growth, thus helping the progression of each Core Strategy.

18. The Brockhill ADR is likely to be a strategic site in the Core Strategy

19. It is not possible for this area to be a strategic site in the Core Strategy, as it only relates to the administrative area of Redditch Borough.

20. Officers note the comment

21. The alternative approaches for this parcel of land will be presented in the Preferred Draft Core Strategy.

22. Development of the Land to the rear of the Alexandra Hospital is considered to be a strategic site because it is essential to meeting some employment requirements.

23. Development of the Land to the rear of the Alexandra Hospital is considered to be a strategic site because it is essential to meeting some employment requirements.

24. This area is already a strategic site.

25. This has been considered for inclusion on the Local List however it was not considered to warrant justification for inclusion. Similarly it is not appropriate as a strategic site essential to delivering the vision for the Core Strategy.

26. Officers do not consider Mettis Aerospace an appropriate strategic site.

27. A study examining the Green Belt of Redditch and the areas currently designated as ADR has been undertaken and demonstrates that the Brockhill ADR land may be more suitable for development than the Green Belt in Redditch's rural south-west, therefore Brockhill ADR is likely to be a strategic site. Whereas for Webheath ADR and the A435 ADR, the alternative approaches for these parcels of land will be presented in the Preferred Draft Core Strategy.

28. It is not possible for this area to be a strategic site in the Core Strategy, as it only relates to the administrative area of Redditch Borough.

29. Officers note the comment

Action to be taken with comment

10. Consider removing the Town Centre as a strategic site on the key diagram.

12. Consider modifying the key diagram to show that the Sustainable Urban Extensions are Strategic Sites.

Question No.	8
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Question Title	Is there anything else the Council should receive planning obligations for / Community Infrastructure Levy, in addition to the list below? <i>(list provided)</i>
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URN of Consultees
001; 002; 004; 005; 007; 008; 016; 024; 026; 027; 028; 030; 031; 032; 033; 035; 037; 038; 041; 042; 043; 045; 048; 049; 052; 080; 082; 083; 088; 089; 090; 091; 093; 096; 097. Total of 35 Respondents.

Summary of Comment(s)

Summary of Representations for Question 8

1. Maintain/ improve wildlife sites, working with the wildlife trust. (016)
2. The extensive shopping list is likely to result in a standard charge that may be unable to be borne if small-scale development is to take place. This type of policy favours large-scale development by national companies rather than small-scale development. The total CIL charge may mean a development is uneconomic, resulting in inefficiency and unnecessary work and time. A shorter 'shopping' list prioritised to ensure a realistic outcome and linked to relevant partners, would be more effective in delivery (*this is supported by the CLG document – Infrastructure delivery etc, June 2008.*). Development will only take place where it is viable in the current economic situation. Over ambitious CIL will prevent new development and regeneration. (026)
3. This approach should be developed as part of the implementation section of the Core Strategy. (028)
4. It is good to see that a joint approach is being proposed given that there may be a number of cross-boundary infrastructure issues and projects required to support the levels of growth proposed for Redditch. (028)
5. The planning obligations and elements for any proposed CIL should be related to development proposals in the context of delivery and not simply shopping list of topics or schemes. (028)
6. Extra facilities for elderly in their homes (008)
7. This is a disgrace over most of the country. Redditch is approx 75% efficient. (035)
8. The list includes too many contributions that should be funded from normal Government and Local Authority programmes and by commercial operators. There should be no requirements on developers and landowners to fund and/or subsidise retail facilities, counter terrorism measures, the courts, voluntary sector, prisons, the Environment Agency, utilities, social services and energy infrastructure. (042)
9. Given the existing resource in Redditch there is no justifiable requirement for additional green infrastructure provision (parks, pitches, sports and leisure). (042)
10. Strange how bus service does not go past Halfords and GKN and Law Society, 3 big employers in Redditch. (007)
11. Supports idea of joint CIL on the assumption that the quantum of CIL would be calculated on the basis of the cost of development in the area of English Partnerships land. Not appropriate to set a single CIL charge to be paid by developers on all land in Redditch, Stratford and Bromsgrove. (048)
12. Public transport - Monies for bus stops and shelters. (037) (038)
13. Flood management. (032)
14. Active traffic law enforcement by traffic wardens. (033)

15. It is questioned why the Environment Agency is listed as a separate organisation – it is assumed that flood defence, SUDS, flood risk management and maintenance (including defence and mitigation works); flood warning; drainage infrastructure (including SuDS); biodiversity enhancements; remediation works (i.e. long term monitoring) and will be provided via funding to the Environment Agency. It could be considered in more detail as part of an SPD. (049) (093)
16. Habitat creation, management of existing habitats (particularly semi-natural habitats) and biodiversity enhancements. (049)
17. Inclusion of waste disposal within the proposed Community Infrastructure Levy list is supported. (049)
18. Policy must be in accordance with Circular 05.2005. (005)
19. Whilst the CIL can effectively support development across the Borough, an approach that ensures the level of developer contributions correspond to the level of investment required in local infrastructure. This avoids a circumstance whereby developers are required to contribute towards infrastructure improvements which have no relationship with the development proposed. (045)
20. The CIL must be fully justified and audited. (031)
21. Consideration must be given to the revenue aspects that flow from new development which should not be expected through the CIL process. (031)
22. It needs to be supported by a robust evidence base of what physical, social and green infrastructure is required to sustain the amount of development proposed. The list is not supported by a published base. (030) (031)
23. This seems too long if it makes CIL so high that it disadvantages development. (004)
24. Would welcome prioritisation of planning obligations, with the second tier being only used in appropriate circumstances. (004)
25. Office and high quality business park locations. (001) (052)
26. Leisure centres i.e. high quality swimming pools. (001)
27. Bordesley Bypass with new rail station at Weights Lane. (002)
28. Planning obligations must only be sought when they meet all the tests set out in para B5 of Circular 05/2005. It is inappropriate for DPD's to set out shopping lists of requirements or obligations to be sought from developments irrespective of the five tests. (030) (043)
29. Core Strategies must cover who will provide the infrastructure and prioritise its delivery in discussions with key local partners, including developers of strategic sites. (030)
30. This section is premature as the CIL has not been formally adopted as national planning policy. (005)
31. This seems a comprehensive list. (024)
32. Support for a policy in the Core Strategy for a general approach to planning obligations with appropriate references to strategic sites and clear links to the details set out in an accompanying SPD (investing in an SPD will set clearly what is required of the developer and other funding partners). (089)
33. It is not clear what is meant by the term 'community facilities' and the examples given are inadequate. What is required is a description of the term in the Glossary or within text. It is suggested that 'community facilities' are described as facilities that provide for health, welfare, social, educational, leisure and cultural needs of the community. (089)
34. It is not clear if the term 'sports and leisure (built)' includes cultural facilities. 'culture and leisure' has been used as a heading on page 2- and 'cultural and leisure opportunities' have been included as a Strategic Objective, however the word 'culture' does not appear in any issue. Please include it in the Planning Obligations either with sports, leisure and culture (built) or within a description of the term 'community facilities'. (089)
35. Public open space areas of land. (083)
36. Indoor sports facilities. (082)
37. Nursing homes, Postal services, Religious buildings/spiritual matters – where it is relevant to the community/environment. (080)

38. Welcomes Police Authorities being identified by the Council as being essential infrastructure. This greatly assists in delivering the capital funding required to pay for new buildings to accommodate what will be a significant expansion of police numbers in the Redditch district, in response to the increase in population. As planning plays a key role in delivering safe, secure and sustainable communities, any policy should be in accordance with PPS 12, Safer Places, Green paper 'Homes for the future etc'. (091)
39. Yes.. We would advocate biodiversity enhancement and natural greenspace including this within the 'Green' sector above, in recognition of the fact that semi-natural open space can sometimes offer a wide range of community benefits (including mitigation of and adaptation to climate change effects) as well as providing direct biodiversity benefits. We would very strongly advocate the inclusion of a policy regarding the need for a wide-ranging Green Infrastructure Strategy to cover the Borough, together with a mechanism for funding works proposed within it. There are a number of these strategies already in use and we would welcome the opportunity to work with the Council on developing a GI document for Redditch in due course. (090)
40. Question whether the list should include the items listed other than public transport, health, utilities, education and community facilities. (096)
41. Inclusion of a Green Infrastructure section on this list would make more explicit the need to secure high quality open space, providing multifunctional benefits for biodiversity and recreation. The Community Infrastructure Levy will be the best mechanism for ensuring that development contributes to the natural environment by providing well planned and evidenced environmental benefits which functioned within an overall network. (088)
42. Ensure 'critical masses within Arrow Valley to support railway, Studley Bypass and Bordesley By-pass. Negative choice objectives are nonsensical and ignorant. (041)
43. Building aggregate by rail is possible. (041)
44. Environment Agency should be removed from DEFRA and given own budget. (041)
45. Sustainable drainage does not work. (041)
46. Provision of new highways capable of carrying the additional traffic being created by the development and transferring onto existing overcrowded routes. (097)
47. Support given. (027)

Officers Response to comment(s)

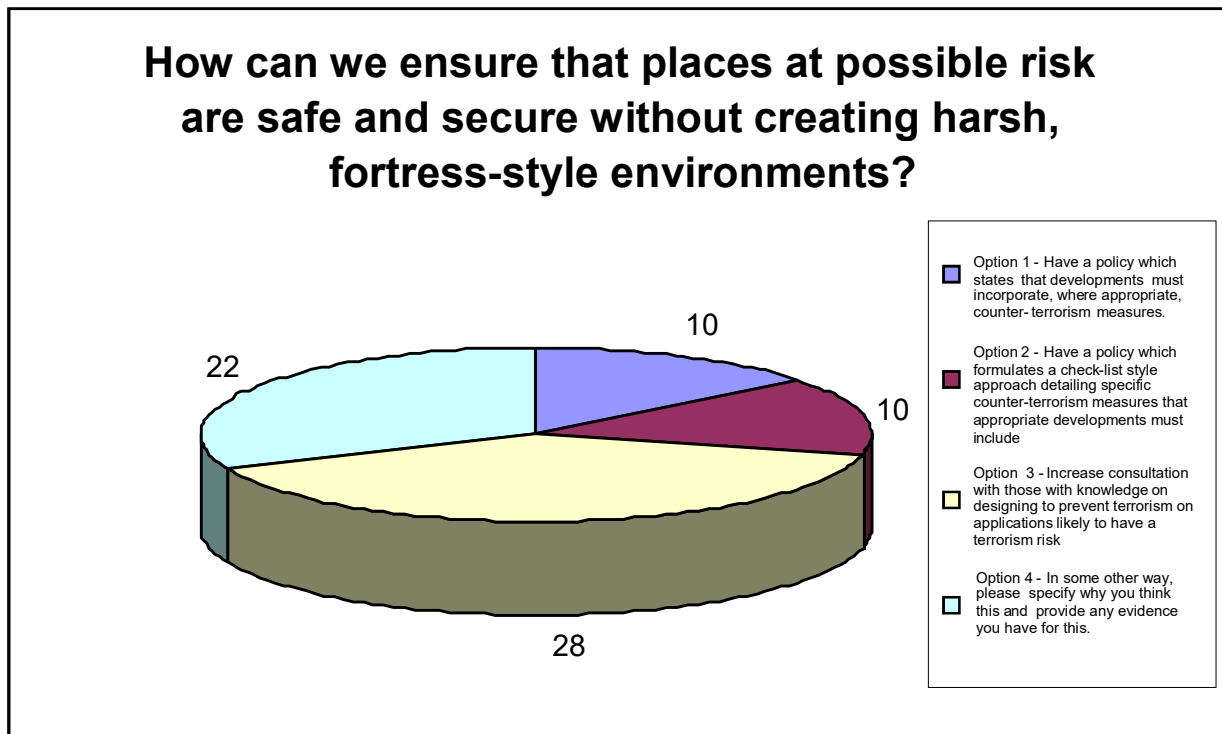
1. It is considered that it is unreasonable to request monies to maintain/ improve wildlife sites/ habitats, because any potential effects on designated sites would have to be mitigated as part of any planning application.
2. The intention of CIL is not to act as an economic barrier to development. Any CIL charge would have to be in proportion to the scale of development proposed.
3. Officers agree this could be a viable approach.
4. Officers note the comment
5. Officers note the comment
6. In terms of new development it is anticipated that a proportion of 'Lifetime homes' could be requested. However, It is considered that it is unreasonable to request monies to retrofit existing properties.
7. Officers note the comment
8. Officers agree this could be a viable approach.
9. Any new development would be expected to incorporate green infrastructure to create sustainable communities. It is also considered that it may be appropriate to request monies for the maintenance of existing green infrastructure.
10. Officers note the comment
11. Officers note the comment
12. Public transport is already on the proposed list.
13. Officers agree this could be a viable approach.
14. It is considered that it is unreasonable to request monies towards active traffic law enforcement by traffic wardens. This is funded by other sources.
15. Officers note the comment
16. It is considered that it is unreasonable to request monies to maintain/ improve wildlife sites/ habitats because any potential effects on designated sites would have to be mitigated as part

- of any planning application.
17. Officers note the comment
 18. Officers note the comment
 19. Officers agree this could be a viable approach.
 20. Officers note the comment
 21. Officers note the comment
 22. Officers agree this could be a viable approach
 23. The intention of CIL is not to act as an economic barrier to development. Any CIL charge would have to be in proportion to the scale of development proposed.
 24. Officers agree this could be a viable approach
 25. It is considered that it is unreasonable to request monies towards Office and high quality business park locations.
 26. Built leisure is already included in the list
 27. Locations such as these are too specific; it is also considered that it may be appropriate to request monies for transport infrastructure; highways including roads, walks and waterways are included in the proposed list.
 28. Any mechanisms for collecting monies would be in accordance with the relevant legislation.
 29. This will be included within the Delivery Framework.
 30. Officers note the comment
 31. Officers note the comment
 32. Officers agree this could be a viable approach
 33. Officers note the comment
 34. Officers note the comment
 35. Officers note the comment
 36. Officers note the comment
 37. It is considered that it is unreasonable to request monies towards postal services or religious buildings as they are funded through other sources. With regard to nursing homes this may be considered a viable option.
 38. Officers note the comment
 39. Officers agree this could be a viable approach
 40. Officers note the comment
 41. Officers agree this could be a viable approach
 42. Locations such as these are too specific; it is also considered that it may be appropriate to request monies for transport infrastructure; highways including roads, walks and waterways are included in the proposed list.
 43. Locations such as these are too specific; it is also considered that it may be appropriate to request monies for transport infrastructure; highways including roads, walks and waterways are included in the proposed list.
 44. This is not a spatial planning matter for this Core Strategy.
 45. Officers note the comment
 46. Highways are already on the proposed list.

Action to be taken with comment

None

Response to Question 9



Summary of Representations to Question 9 Option 4

Question No.	9	Question Title	How can we ensure that places at possible risk are safe and secure without creating harsh, fortress-style environments? <i>Option 4 in some other way, please specify why you think you think this and provide any evidence you have for this</i>
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URN of Consultees

001; 002; 006; 009; 010; 028; 030; 034; 035; 036; 039; 040; 041; 042; 045; 050; 052; 080; 084; 089; 091; 092. Total of 22 respondents.

Summary of Comment(s)

1. It is essential to incorporate the expertise of anti-terrorism authorities at every level. The checklist should not allow for flexibility. (010)
2. There needs to be an overall design policy to contain issues relating to the role planning plays in creating safe and secure environments. This approach only concentrates on terrorism. (028)
3. Existing policing seems to be okay, there seems to be too much emphasis on terrorism. (036)

4. Provide an adequate Police force. (035)
5. Ensure natural surveillance within the design of new developments. (042)
6. Adopt a neighbourhood watch policy.(034)
7. This must be achieved without infringing hard upon British freedom. (039)
8. Threat of terrorism is over-rated. There is far too much concern and political correctness placed upon the risk of terrorism. What would a terrorist gain in Redditch? If the police and agencies do their job and the public remain vigilant, the suggested options are a total overreaction. The fear of crime is far more important to most people and therefore this is what must be addressed. (040) (084)
9. A single focus on counter-terrorism measures is an incorrect approach. The focus should be on urban design. In order to reduce crime, anti social behaviour and the fear of crime, it is necessary to create places which are well designed and which people want to live in. There can be a conflict between designing out crime and urban design principles. Do not support a specific approach to counter-terrorism measures and consider that secure by design should just be one part of an overall urban design package. (045)
10. Not relevant, waste of money. (006)
11. How would you do that? More CCTV's that do not work. (009)
12. Emphasis on counter terrorism is absurd. Safe and secure is created by designing out low level crime e.g. secured by design approach. (001)
13. Education (002)
14. Is counter terrorism a matter for the Core Strategy? Is Redditch at greater threat for terrorism than anywhere else? (030)
15. A well-designed high quality public realm that is well integrated with the buildings that surround it can help create a 'sense of place', strengthening 'community identity'. This results in a well-used public space that offers fewer opportunities for crime and anti-social behaviour. Private, public and communal space should be clear. (089)
16. Complete a realistic risk assessment (is Redditch likely to be a terrorist hot spot?) (050)
17. It is important to engage with those with knowledge and experience on this topic including West Mercia Constabulary (this works both ways). (091)
18. Blend options 1, 2 and 3. (080) (091)
19. Most options appear to centre on the issue of terrorism. The context doesn't really give an explanation why and also would it be useful to include designing out crime verses urban design considerations in there? (092)
20. Follow national guidance only; do not make it more difficult for businesses. (052)
21. Visual policing within all development is necessary and layouts accord with 'Colemans Dice' criteria. (041)

Officers Response to comment(s)

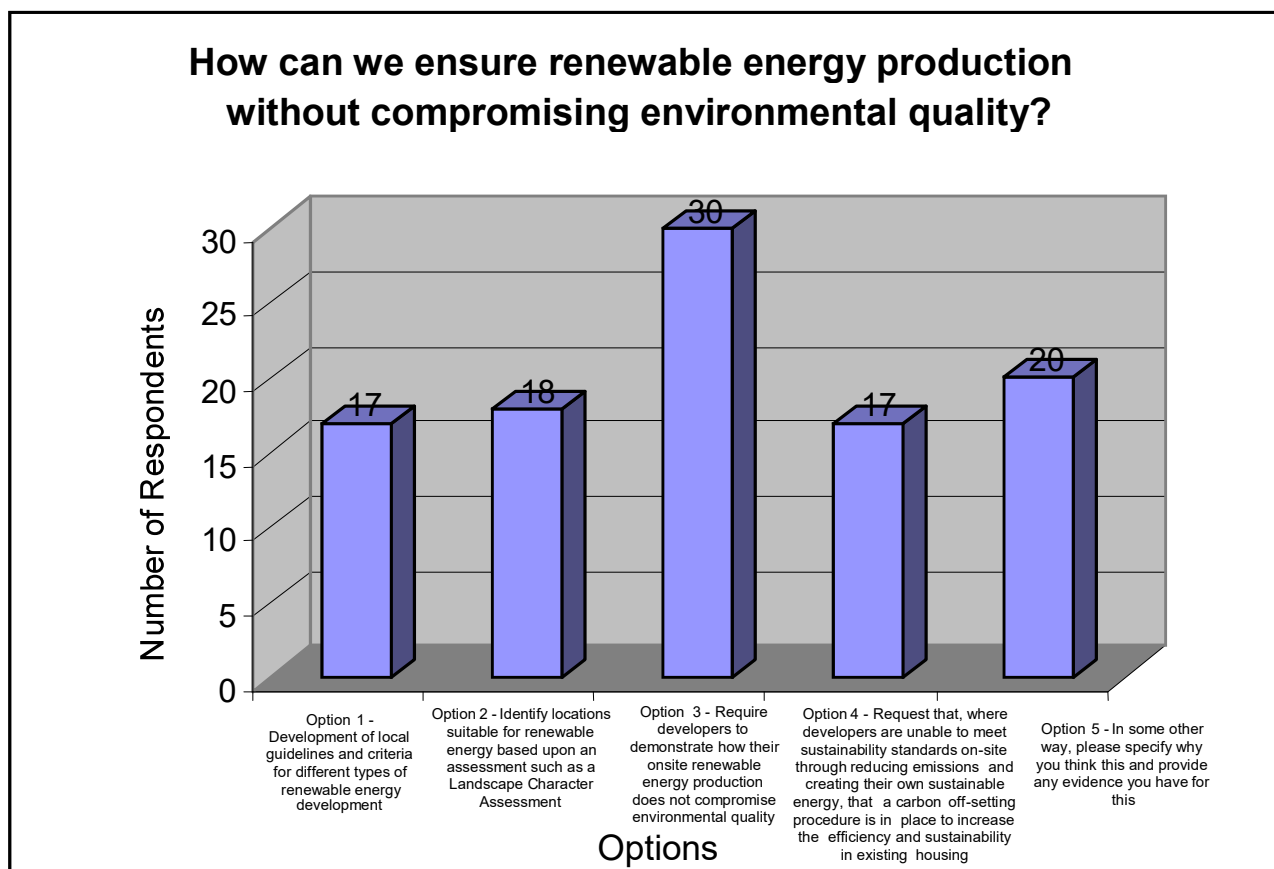
1. Where appropriate, the expertise of the Crime Risk Manager is sought for planning policy and Development Control matters. Whatever format the policy approach takes, an appropriate level of flexibility will have to be ensured.
2. Officers agree with the approach suggested.
3. . It is recommended that an overall design policy will be included in the Core Strategy rather than an emphasis on terrorism.
4. This is not a spatial planning matter.
5. It is recommended that an overall design policy will be included in the Core Strategy rather than an emphasis on terrorism.
6. This is not a spatial planning matter.
7. No Core Strategy policy would be in conflict with Human Rights legislations.
8. It is recommended that an overall design policy will be included in the Core Strategy rather than an emphasis on terrorism.
9. Reducing crime and fear of crime is generally considered appropriate and is therefore recommended for inclusion in the Core Strategy.
10. Reducing crime and fear of crime is generally considered appropriate and is therefore recommended for inclusion in the Core Strategy.

11. The policy approach is recommended to incorporate a range of methods.
12. It is recommended that an overall design policy will be included in the Core Strategy rather than an emphasis on terrorism.
13. This is not a spatial planning matter.
14. It is recommended that an overall design policy will be included in the Core Strategy rather than an emphasis on terrorism.
15. It is recommended that an overall design policy will be included in the Core Strategy and this response may provide appropriate policy wording.
16. It is recommended that an overall design policy will be included in the Core Strategy rather than an emphasis on terrorism.
17. Where appropriate, the expertise of the Crime Risk Manager is sought for planning policy and Development Control matters. Whatever format the policy approach takes, an appropriate level of flexibility will have to be ensured.
18. This could be considered a viable approach; however, it does not suggest an alternative option.
19. It is recommended that an overall design policy will be included in the Core Strategy rather than an emphasis on terrorism.
20. It is envisaged that any policy approach would be in line with national guidance and it is not envisaged that there will not be any additional local requirements.
21. Visual policing is not a spatial planning matter. Layout of all new developments is recommended to continue adhering to national guidance.

Action to be taken with comment

None

Response to Question 10



Summary of Representations to Question 10 Option 5

Question No.	10
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Question Title	How can we ensure renewable energy production without compromising environmental quality? <i>Option 5 in some other way, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

003; 005; 011; 012; 026; 030; 031; 035; 041; 042; 045; 049; 050; 052; 080; 082; 088; 090; 093; 097. Total of 20 respondents.

Summary of Comment(s)

1. Red tape should be removed for wind turbines, solar power, and heat pumps. (003)
2. Renewable energy production is most cost effective on large schemes where production and distribution can be controlled. (026)
3. The payback period for renewable energy must be taken into account; in this case Option 4 must be a requirement, together with Option 3. (026)
4. The notion of carbon neutral is presently unachievable; policy must not run ahead of appropriate and sustainable technological solutions. (026)
5. Too late, we should have gone nuclear ten years ago. (035)
6. Don't let them build unless they can meet standards. (012)
7. Allow flexibility for developers to achieve reasonable provision. (042)

8. The issue is introduced in a negative manner, in reality the two issues of adapting to climate change and safeguarding the environment are one and the same, with positive interventions that could benefit both and in many cases enable win-win situations. (049)
9. Answer related to Q 10, 11 and 12. – Approach to topic is misguided and ill-informed and the issues do not deal with the key objectives of PPS 1 Supplement and whether or not there are particular local circumstances which would justify departing from national and regional policies. (031)
10. Answer related to Q 10, 11 and 12. There is confusion between 'carbon neutral' and 'zero carbon'. (031)
11. This is misguided; the Core Strategy should not be seeking to limit the technologies available to develop. The Core Strategy should be encouraging developers to explore all avenues for the provision of on-site renewable energy on a site-by-site basis. PPS 1 (Para 10) requires exceptional circumstances to be present before any type of renewable energy is precluded. (030) (031)
12. The Issues and Options document fails to consider matters such as the provision of local de-centralised energy supply in the Borough. (030) (031)
13. The whole basis in the premise in this question is unsound being inconsistent with national policy. (030)
14. Allow flexibility for developers to achieve reasonable provision. (042)
15. The Planning and Climate Change supplement to PPS1 states in paragraph 20 that LPAs should "ensure any local approach to protecting landscape and townscape is consistent with PPS22 and does not preclude the supply of any type of renewable energy other than in the most exceptional circumstances." Also "Policies should be designed to promote and not restrict renewable and low-carbon energy and supporting infrastructure." Any renewable policies shouldn't be constrained by importance to be protected under the policies of PPS22, including internationally and nationally designated sites of importance. Object to options 1, 2 and 3 which all constrain renewable energy production due to concerns about compromising environmental quality. (005)
16. Option 4 encourages carbon off-setting where developers are unable to meet sustainability standards on-site. This is appropriate for Redditch which will require an urban Capacity led approach. (005)
17. A mixture of the above. They are not mutually exclusive. (050)
18. Question 10 should not simply relate to renewable energy provision but should relate to energy efficiency, of which renewable energy is just one part (para 9 of Planning and Climate change - supplement to PPS1). (045)
19. Grants and incentives should be supplied where possible. (082)
20. Green building should be for the long term. Some low energy housing being built in the borough are made of wood and only have a potential life of thirty years. This is wasteful of energy in the construction, as they will have to be replaced too soon. (011)
21. Blend options 1, 2, and 3 (080)
22. Consider refuse incineration with district heating and link it to heat swimming pools and sporting facilities. (052)
23. Section only appears to consider renewable energy. Climate change is a cross cutting theme which affects flood risk, water quality, water resources and biodiversity. (093)
24. Require all new development to incorporate SuDS (water quality and biodiversity betterment) (093)
25. Require all new development to include water efficiency techniques, linked to the code for sustainable homes' requirements e.g. level 3 or above. (093)
26. Require all development over a particular threshold to incorporate measures to retrofit existing properties with SuDS. (093)
27. Require all development over 20 homes to contribute to retrofitting of water efficiency techniques into new development (especially where there are known water supply problems) (093)
28. We would suggest that an option 5 solution combining the benefits of 1-4 but augmented with commentary on the need to respect environmental limits and use up-to-date ecological information to inform site allocations would be the most positive way forward. (090)

29. Although environmental quality is an important issue and sensitive habitats, species and landscapes should not be compromised, the preamble and Options presented here seem overly negative. PPS22 states that “local development documents should contain policies designed to promote and encourage, rather than restrict, the development of renewable energy resource”. In addition, it should be remembered that climate change will impact upon habitats, species and landscapes too, and that renewable energy sources offer a solution which is potentially less damaging in the long term than the effects of business as usual emission rates. (088)
30. It is unclear from this section whether the Options are around large scale renewable technologies, micro-renewables or both. It would be a very narrow view to apply a blanket requirement to all situations. (088)
31. Like the idea of wave generation. (041)
32. Assist with grant aid to help install renewable energy systems on existing properties. (097)

Officers Response to comment(s)

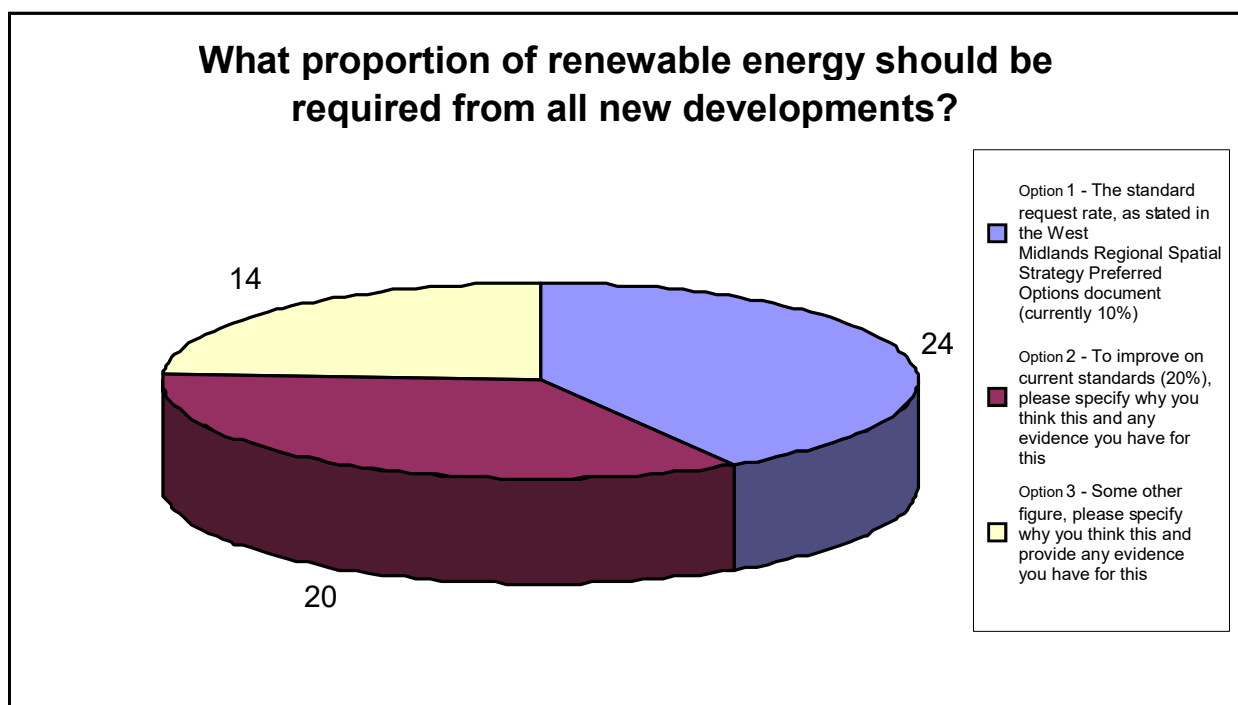
1. Legislation governing the use of the technologies suggested is set at national level. This cannot be influenced through the Core Strategy.
2. Officers agree, but consider that renewable energy production can be cost effective on smaller schemes also (PPS22, paragraph 1, criteria vi).
3. Planning Policy Statement 22, paragraph 1, criteria v states “Local Planning Authorities should not make assumptions about the technical and commercial feasibility of renewable energy projects”.
4. Officers consider that although national policy does not yet require carbon neutral developments; this can be achieved with the solutions that are currently available.
5. This is not an issue for the Core Strategy to consider.
6. Standards will be set but must incorporate a degree of flexibility for when it is unfeasible to meet the standards.
7. Standards will be set but must incorporate a degree of flexibility for when it is unfeasible to meet the standards.
8. Officers agree that adapting to climate change and safeguarding the environment are dual considerations but that there is some conflict between adapting to climate change and its impact on the environment.
9. The Context to the Issues and Options Document explained why this approach was taken in the Issues and Options Document. It was not considered that there were any other locally distinctive issues relating to this topic. It is not envisaged that there would be any local circumstances to justify departure from national or regional planning policy; however, RSS (Phase II Preferred Option Draft) policy SR1 requires Core Strategies to include climate change policies.
10. Officers agree that Carbon Neutral and Zero Carbon should be explained in the glossary
11. The Issues and Options Document does not seek to limit the technologies.
12. This was not considered appropriate to include in the Issues and Options Document. It is not envisaged that specific reference to a local decentralised energy supply is appropriate in a Core Strategy policy but it may be appropriate for inclusion as part of a renewable energy policy.
13. The Context to the Issues and Options Document explained why this approach was taken in the Issues and Options Document. It was not considered that there were any other locally distinctive issues relating to this topic. It is not envisaged that there would be any local circumstances to justify departure from national or regional planning policy; however, RSS (Phase II Preferred Option Draft) policy SR1 requires Core Strategies to include climate change policies.
14. Standards will be set but must incorporate a degree of flexibility for when it is unfeasible to meet the standards.
15. It was not intended to constrain renewable energy production but to highlight that there are potential conflicts. Officers agree with references to national planning policy.
16. It is unclear what the link is between carbon off-setting and an urban capacity led approach. Support for option 4 noted.

17. Officers note the comment
18. This was not considered appropriate to include in the Issues and Options Document. It is not envisaged that specific reference to energy efficiency is appropriate in a Core Strategy policy but it may be appropriate for inclusion as part of a renewable energy policy.
19. Redditch Borough Council provides Council Tax relief incentives for householders that make improvements for energy efficiency. The Environmental Health department also currently offer grants to householders in certain circumstances.
20. Low carbon housing is considered to be a sustainable option.
21. Officers note the comment
22. Officers note the comment
23. The Context to the Issues and Options Document sets out why these matters were not included in the Issues and Options document but it is likely that they will be considered in the Core Strategy.
24. The Context to the Issues and Options Document sets out why these matters were not included in the Issues and Options document but it is likely that they will be considered in the Core Strategy.
25. Level 3 of the Code for Sustainable homes is proposed to become a national requirement in 2010. The Core Strategy is due to be adopted in February 2011 and will be in line with national planning policy.
26. It is not possible to retrofit *properties* with SuDS; this would be applied to the *land* surrounding properties. The feasibility of this will be explored.
27. The feasibility of retrofitting properties with water efficiency techniques will be explored.
28. Officers agree combining the benefits of option 1-4 could be an appropriate solution. The Boroughs Special Wildlife Sites will be reviewed to inform the Core Strategy. The Core Strategy is informed by other up to date ecological information.
29. Officers note the comment
30. The question presented covers both large scale renewable technologies and micro-renewables. Officers agree that there should be separate policy approaches with regard to large scale renewable technologies and micro-renewables.
31. Officers note the comment
32. Redditch Borough Council provides Council Tax relief incentives for householders that make improvements for energy efficiency. The Environmental Health department also currently offer grants to householders in certain circumstances.

Action to be taken with comment

10. Consider defining Carbon Neutral and Zero Carbon in the glossary

Response to Question 11



Summary of Representations to Question 11 Option 2

Question No.	11	Question Title	What proportion of renewable energy should be required from all new developments? <i>Option 2 – To improve on current standards (20%), please specify why you think this and any evidence you have for this</i>
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URN of Consultees

002; 008; 011; 014; 016; 024; 026; 030; 031; 032; 037; 038; 040; 045; 049; 051; 084; 088; 097.
Total of 20 Respondents.

Summary of Comment(s)

1. The situation with global warming could be worse than predicted. (016)
2. The cost of fuel. (051) (011)
3. An increased requirement over and above RSS is laudable, however any requirement that is not technically achievable realistically is likely to be counter-productive in terms of compliance with any planning conditions (Option 1 is preferred). Alternatively there may be a threshold for different types and scale of development. (026)
4. Current standards will probably not be enough to make a difference. (032)
5. 10% is national target for 2010. This document runs until 2026. (040)
6. A rationale for departing from national policy is not provided. (030) (031)
7. In relation to the 20% option, there is no evidence provided to say that this target is being met and that a continuation of this is supportable given local circumstances. National and regional target is 10% and any departure from this must be justified by reference to a sound evidence base. (045) (030) (031) (049)

8. All new houses should be eco friendly. (002)
9. Provide heat and some electricity from renewable sources. (002)
10. Needs must. (024)
11. Scope of question should be widened to refer to energy efficiency rather than just renewable energy provision. (045)
12. Use of word "required" is not supported by the Planning and Climate Change supplement to PPS1. Para 8 refers to targets. It's an expectation (see para 20). (045)
13. Para 42 of PPS1 supplement sets criteria for considering environmental performance of new developments. This should be assessed not just against renewable energy provision. A site not capable of provision may still perform highly with environmental performance and shouldn't be discounted. The first criteria of para 42 includes an exception to decentralised energy supply, where it can be demonstrated that having regard to the type of development involved and its design, that it is not feasible or viable. It's inappropriate to apply a blanket requirement upon all development. (045)
14. There are three presented options. The first related to the WMRSS preferred option of 10% is draft policy and has not been tested nor has any weight. The 20% provision has no evidence for the proposed increase and seems arbitrary. Query if this is a sound approach to policy preparation. Not aware of local community strategies which demonstrate a localised approach to energy efficient provision and as such do not consider that there is an appropriate evidence base to justify a higher percentage provision. (045)
15. 20 years experience of solar hot water heating. (097)
16. Support Option 2 as a minimum. Targets should ideally be set above the existing RSS request rate of 10% as this is not aspirational enough. The ongoing RSS review is likely to increase the current 10% request rate in line with the aims of national policies.

Officers Response to comment(s)

1. Officers note the comment
2. Officers note the comment
3. At this stage it is unlikely the evidence will be provided to justify requiring 20% or requiring different thresholds for different types and scales of developments.
4. Officers note the comment
5. It is considered there will be flexibility within the Core Strategy to take account of possible changing national or regional requirements.
6. A rationale for departing from national policy is not necessary for the Issues and Options Document, any justification should be provided for the submission version.
7. The Issues and Options Document did not suggest that 20% was being met and at this stage it is unlikely the evidence will be provided to justify requiring 20%.
8. Officers note the comment
9. Officers consider this is a viable approach however, this does not suggest the proportion of renewable energy that should be required from new developments.
10. Officers note the comment
11. Energy efficiency is considered as part of the Code for Sustainable Homes and this is likely to be reflected in the Core Strategy.
12. Officers agree.
13. Officers agree.
14. Officers agree.
- 15 Officers note the comment
16. At this stage it is unlikely the evidence will be provided to justify requiring 20% or requiring different thresholds for different types and scales of developments

Action to be taken with comment

None

Summary of Representations to Question 11 Option 3

Question No.	11	Question Title	What proportion of renewable energy should be required from all new developments? <i>Option 3 – Some other figure, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

003; 005; 007; 012; 014; 020; 028; 030; 031; 035; 037; 045; 080; 084. Total of 14 Respondents.

Summary of Comment(s)

1. Ensure that all buildings comply with current regulations (Part L) (003)
2. The level required should not be higher than that required by the West Midlands Regional Spatial Strategy (10%). (045)
3. Any policy should incorporate an element of flexibility to allow for circumstances where it will not be viable or suitable to incorporate renewable energy equipment to reduce CO² emissions by a given percentage. Paragraph 8 of PPS 22 states that a percentage of energy requirements from onsite renewable energy generation can be required but this is subject to the caveat that: only be required where viable and does not place a burden on developers (*full extract given*). Any requirement should have flexibility, and be subject to tests of viability and suitability. (020)
4. Climate change should be a cross cutting theme within the Core Strategy, to be taken into account when considering such issues as location of development, transport and design polices. The approach in this consultation document appears to be concentrating on renewable energy. (028)
5. Aim as high as possible. (012) (035)
6. 30%. Waste disposal shows recycling rate of above 50% so it can surely be done. (007)
7. There is no rationale for a departure from national policy (PPS 22) or RSS (10%), other than striving to be as sustainable as possible, because that would be a good thing, which is not a sound basis on which to formulate policy. (030) (031)
8. Any level of requirement or targets for renewable energy provision for new developments should only be formulated using an extensive evidence base, including a thorough understanding of the local feasibility and potential DOE renewable energy supply. Para 26(iv) of the supplement to PPS1 deals with bringing forward targets on decentralised energy to supply new developments and states that LPAs should "ensure there is a clear rationale for the target and it is properly tested." (005)
9. If current standards are 20%, we must strive to improve on that, providing the options are cost effective. (084)
10. Continue to increase it. Rigorous planning and inspection will be required. For example for two years 2010 and 2011 make it 30%; then for 2012 and 2013 make it 40%; 50%... Be more and more demanding as better technology/methods become available and cheaper. (080)

Officers Response to comment(s)

1. This is a Building Regulations requirement.
2. Officers note the comment
3. Officers note the comment
4. The Context to the Issues and Options Document explained why this approach was taken in the Issues and Options Document. It was not considered that there were any other locally distinctive issues relating to this topic. RSS (Phase II Preferred Option Draft) policy SR1

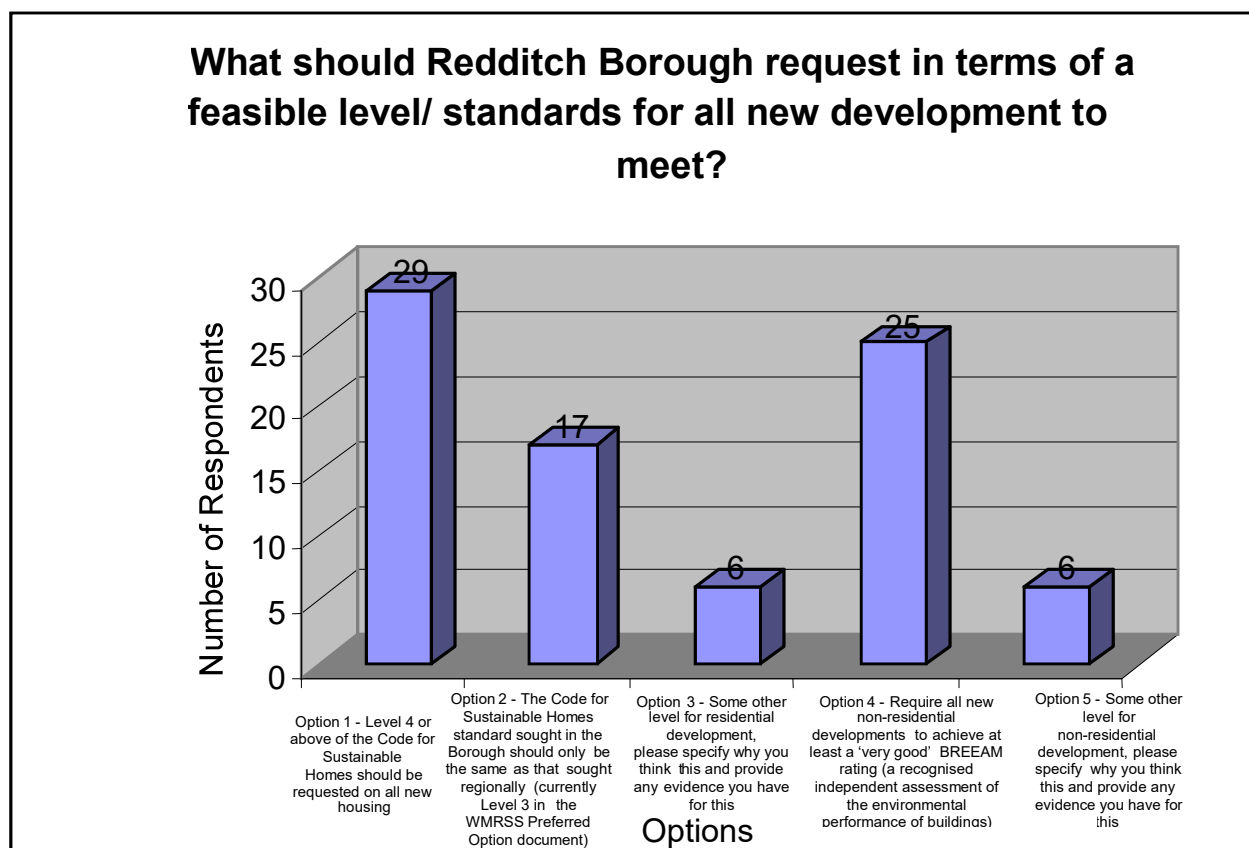
requires Core Strategies to include climate change policies.

5. Officers note the comment
6. Recycling targets are different to the proportion of renewable energy target. It is unlikely that evidence will be provided justifying a higher level than that requested in the RSS.
7. It is unlikely that evidence will be provided requiring a higher level than that requested in the RSS.
8. It is unlikely that evidence will be provided requiring a higher level than that requested in the RSS.
9. The Issues and Options Document did not suggest that 20% was being met and at this stage it is unlikely the evidence will be provided to justify requiring 20%.
10. It is unlikely that evidence will be provided requiring a higher level than that requested in the RSS.

Action to be taken with comment

None

Response to Question 12



Summary of Representations to Question 12 Option 3

Question No.	12
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Question Title	What should Redditch Borough request in terms of a feasible level/ standards for all new development to meet? <i>Option 3 – some other level for residential development, please specify why you think this and provide evidence you have for this.</i>
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URN of Consultees

026; 030; 031; 037; 038; 093. Total of 6 Respondents.

Summary of Comment(s)

1. A sliding scale starting with Level 3 for the present. (026)
2. To achieve vision achieve level 6 (zero carbon) of the code and equivalent target for BREEAM by an agreed year (timescale). (093)
3. Affordable housing and bungalows for older people. (038)
4. Code level 3 should be maintained. There is a need to be realistic and not impose targets that will be unviable and unachievable. Imposing ad-hoc targets which seek to accelerate the code is unhelpful and cannot be justified in that it will stifle rather than promote new development. (031)
5. Any departure from national policy with regard to Code for Sustainable Homes should be

justified and supported with an evidence base. (030) (031)
 6. As it will be difficult for construction industry to meet 2016 target, any imposed target seeking to accelerate this is unhelpful and cannot be justified, stifling development. (030) (031)
 7. Do not consider that the Core Strategy needs to replicate existing policy and regulations. (045)

Officers Response to comment(s)

1. It is anticipated that the Core Strategy will be flexible to allow for adjustments in the required level of the Code for Sustainable Homes.
 2. It is not anticipated that the Core Strategy will set timescales or targets that are not justified through regional and/or national policy.
 3. This is not suggesting a viable option for this issue.
 4. It is not anticipated that the Core Strategy will set timescales or targets that are not justified through regional and/or national policy.
 5. It is unlikely that evidence will be provided justifying a higher level than that requested in national or regional policy.
 6. It is not anticipated that the Core Strategy will set timescales or targets that are not justified through regional and/or national policy.
 7. RSS policy SR1 requires Local Authorities in Core Strategies to include policies on Climate Change.

Action to be taken with comment

None

Summary of Representations to Question 12 Option 5

Question No.	12	Question Title	What should Redditch Borough request in terms of a feasible level/ standards for all new development to meet? <i>Option 5 – some other level for non-residential development, please specify why you think this and provide and evidence you have for this.</i>

URN of Consultees

003; 014; 037; 038; 049; 092. Total of 6 Respondents.

Summary of Comment(s)

1. BREEAM would be costly; this would be reflected in development costs with little return. (003)
 2. Green Roofs (003)
 3. Is this a realistic option? I understood that it is planned that this will become compulsory. (092)
 4. The most ambitious code (level 4) falls way short of achieving the strategic objective of carbon neutral development. Similarly the highest BREEAM rating option is 'very good' when the Strategic Objective calls for 'excellent'. (049)

Officers Response to comment(s)

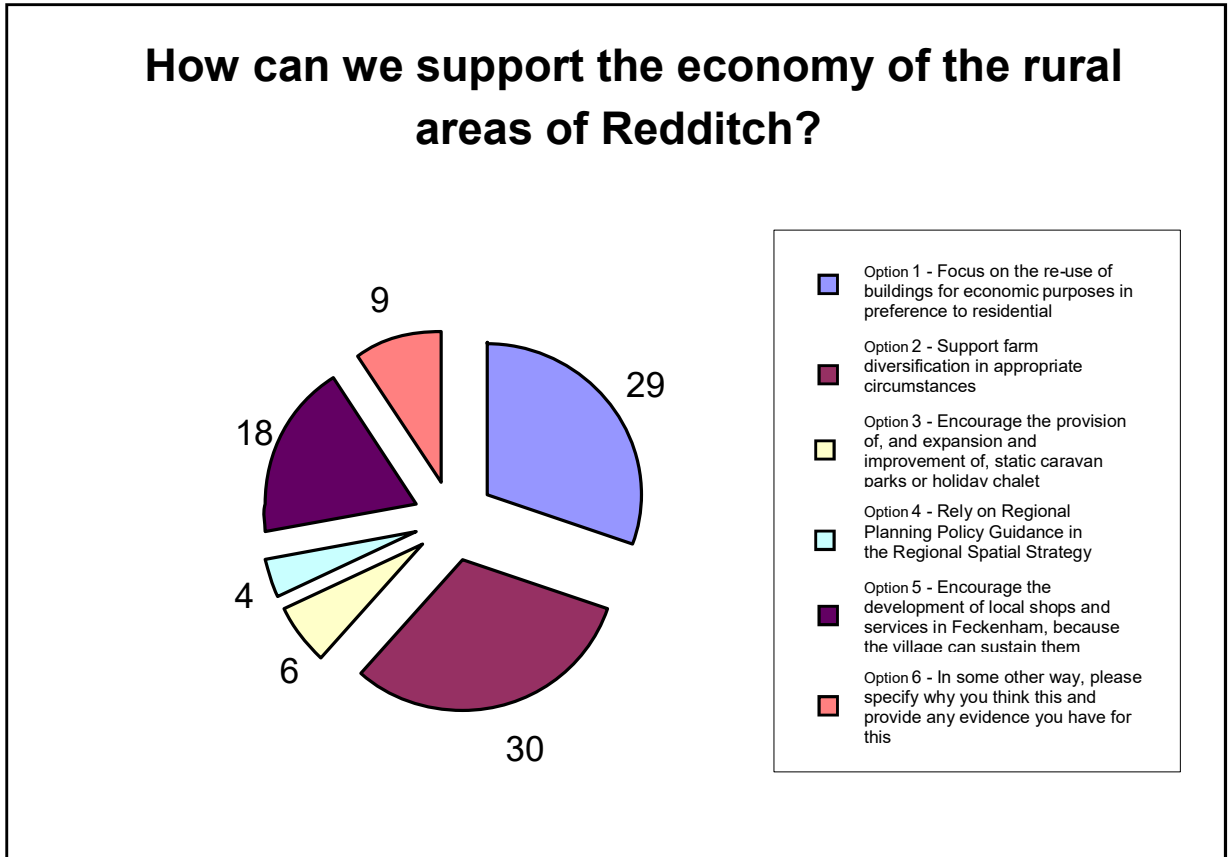
1. It is anticipated that standards for non-residential developments will become a national requirement; the Core Strategy will be in conformity with this.

2. Officers note the comment
3. It is anticipated that standards for non-residential developments will become a national requirement; the Core Strategy will be in conformity with this.
4. It is unlikely that the Core Strategy will be able to justify any code level or BREEAM rating above the national requirements.

Action to be taken with comment

None

Response to Question 13



Summary of Representations to Question 13 Option 6

Question No.	13
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Question Title	How can we support the economy of the rural areas of Redditch? <i>Option 6 – in some other way, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

003; 007; 008; 030; 035; 041; 052; 089; 093. Total of 9 Respondents.

Summary of Comment(s)

1. Cutting down Council Tax to new ventures within villages. (003)
2. Bus services to local farm shops. (008)
3. Better to have local facilities (expensive travel and parking). (035)
4. More allotments. (007)
5. General principle and need to bring forward a range of measures is supported. (030)
6. To increase cultural activity and cultural facilities consideration should be given to providing local facilities in barn conversions (for example) that combine space or resources for a range of cultural, commercial and community activities in one place. This is especially important in villages to enable certain groups to have the opportunity to participate who may be excluded. (089)
7. Rural Live/work for fair rent. (052)
8. Option 1 and 3 should be informed by the SFRA and the 'Flood Risk Vulnerability Classification' in PPS25 i.e. residential development is a 'more vulnerable use' to commercial which is 'less vulnerable'. (093)
9. Community self help has shop in place and should be assessed. (041)
10. House key workers that have family in environment. (041)

Officers Response to comment(s)

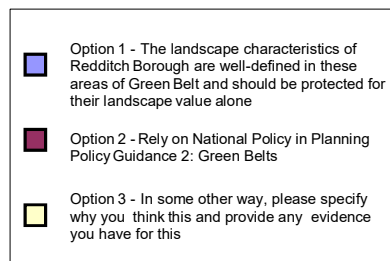
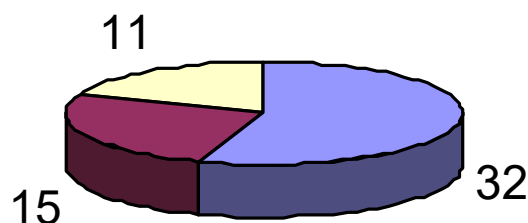
1. This is not a spatial planning matter
2. The Core Strategy has limited control over bus routes.
3. This is covered by option 5.
4. Existing allotments are identified in the Open Space Needs Assessment and protected through the Core Strategy. The Scoping Report has identified that in comparison to other districts, Redditch has a larger proportion of allotments.
5. Officers note the comment
6. It is likely that these functions would not be precluded in the Core Strategy, subject to other Development Control considerations.
7. It is likely that live/work units would be encouraged in the Core Strategy; however, rent levels are not a spatial planning matter.
8. Officers note the comment
9. It is unclear what is meant by the community shop should be assessed.
10. This can be explored.

Action to be taken with comment

None

Response to Question 14

How can we ensure that one of the purposes of Green Belts (to prevent the coalescence of settlements) is not undermined between Redditch and Astwood Bank?



Summary of Representations to Question 14 Option 3

Question No.	14
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Question Title	How can we ensure that one of the purposes of Green Belts (to prevent the coalescence of settlements) is not undermined between Redditch and Astwood Bank? <i>Option 3 – in some other way, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

002; 003; 012; 023; 035; 041; 042; 049; 050; 084; 097. Total of 11 respondents.

Summary of Comment(s)

1. Utilise land unfit for farming to build new developments. (003)
2. Option 2 - may change for the worse. (035)
3. Declare the land not to be used for any other purpose. (035)
4. Fight the use of green belt. Green belt land should not be used (012) (084)
5. Release of land to the north of Redditch for residential development. (042)
6. Consult wildlife experts on rare species. (023)
7. The Green Belt gap between Astwood Bank and Redditch is required to meet the important objective of keeping the settlements separate. The application of PPG2 guidance justifies no change to the current boundary in this location; therefore, there is no additional planning policy than maintaining Green Belt status of the land. (031)
8. Small scale developments - one or two houses in villages. (002)
9. This is too late, it has already happened. (050)

10. This is important and should be protected. (041)
11. The A441 is not capable of carrying any additional traffic entering at these points, it is dangerous and sight lines are minimal. (097)
12. Be aware of phase 3 revisions of green belt. (049)
13. Option 1 is not valid because the landscape element alone is not sufficient to justify the green belt as it does not form one of the purposes. (049)

Officers Response to comment(s)

1. This is not a viable option to deal with this issue.
2. Officers agree and possible changes to PPG2 are the justification for the inclusion of a local policy on this issue.
3. Officers note the comment
4. Officers note the comment
5. Releasing land in other locations would not resolve this issue.
6. To secure nature conservation interests is an objective for the use of Green Belt land; however, PPG2, paragraph 1.7 states "The extent to which the use of land fulfils these objectives is however not itself a material factor in the inclusion of land within a Green Belt or its continued protection." Therefore this cannot prevent the coalescence of settlements.
7. This is a viable approach to deal with this issue.
8. The settlement hierarchy sets out the most sustainable growth levels for each settlement in Redditch. It is not considered that Feckenham is a sustainable settlement in which to accommodate large scale developments, therefore the approach suggested may be viable. Astwood Bank may be considered for a sustainable level of development to support its continued role and function.
9. Officers disagree; there are still pockets of Green Belt.
10. Officers note the comment
11. Officers note the comment
12. Officers note the comment
13. Officers agree with this comment.

Action to be taken with comment

None

Summary of Representations for Question 15

Question No.	15	Question Title	Because there is only limited opportunity for employment development on ADR land, do you think that all ADR land that can accommodate employment development should be used for employment purposes?
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URN of Consultees

001; 002; 003; 004; 007; 010; 011; 014; 015; 016; 017; 018; 019; 021; 022; 023; 024; 030; 031; 032; 033; 034; 035; 036; 039; 041; 042; 045; 048; 049; 050; 051; 052; 053; 054; 055; 056; 057; 058; 059; 060; 061; 062; 063; 064; 065; 066; 067; 068; 069; 070; 071; 072; 073; 074; 075; 076; 077; 078; 079; 080; 081; 082; 083; 084; 088; 090; 092; 096; 097. Total of 70 Respondents.

Summary of Comment(s)

1. Only if needed. (004) (015)
2. No (001) (011) (014) (016) (018) (035) (051) (081)
3. Some in Brockhill (017)
4. Some limited plots for housing alongside Claybrook Drive (A435) inclusive of open space. (017)
5. Far Moor Lane inclusive of Winyates Green Triangle should be a linear park. (017)
6. Employment land should not be built up to remain empty, if there is no need for the land for employment then low level residential development should be allowed. (010)
7. All vacant units should be let before new development. (019)
8. If factories are built then housing will be needed for the workers, this is double the amount of development. (003)
9. It is questioned whether Redditch needs any more employment land. (036)
10. This should be assessed in detail as part of the wider Employment Land Review. As a matter of general principle, where appropriate ADRs should accommodate some employment land provision though this should be in the context of an appropriate mix of uses. (042)
11. No - too many empty buildings may and do occur. (007)
12. Yes (034) (082) (083) (039)
13. Some of the southern parcels of the A435 ADR i.e. those which are opposite existing industrial development, could be suitable for employment purposes in the future. The fact that the southern parcels are opposite existing employment uses doesn't make them unsuitable for housing. (048)
14. Not if employment needs can be met by redeveloping brownfield sites. (032)
15. No, development should go upwards on existing land. (033)
16. Green land should not be used. (033)
17. Only if it is environmentally and financially friendly to Redditch. (023)
18. Development on the ADRs may be necessary to achieve the growth targets identified for Redditch. In determining how far these can be developed for employment only, the Employment Land Review will hopefully be of use. The key issue will be to provide a range of good quality employment sites, and to use enabling development if this is required to help deliver more choice. (022)
19. Brockhill ADR is suitable for prestigious employment use. ADR west of the railway line should be used for residential purposes. (031)
20. A435 ADR. Although the site can accommodate housing development, it cannot create a sustainable community due to the configuration of the site. The site would be better developed for employment use. (031)
21. North West Redditch – ADR at Brockhill East together with the land on the western part of the site in the Green Belt would be capable of making an early contribution to meeting the housing requirements for Redditch. The whole site will be able to accommodate residential, employment as well as other mixed uses. (031)
22. The approach to employment land should be taken in parallel with housing needs to determine the most appropriate distribution of land uses in the wider Redditch area. There is

no evidence to suggest that the draft RSS is based on a detailed study of housing and employment land opportunities and the district split for housing and employment land needs must be scrutinised through the RSS Examination. (031)

23. Allow residential property to be extended where appropriate, and used for home working. (002)

24. ADRs should be allocated for the use of which they are most suited. (030)

25. The wording of this question is puzzling and potentially misleading. (030)

26. Strong support (from Persimmon) for the allocation of Brockhill East for residential development. (030)

27. Yes, because employment is very important for this town. (024)

28. It is clear that we do not have the required residential or employment land available in the Borough to satisfy WMRSS. Therefore, any use of ADR land for employment will remove its availability for housing. Consider Webheath ADR is unsustainable for housing or employment, all other ADR land must be used for housing. (084)

29. There needs to be enough people to fill the jobs created without having to travel more than 3 miles. If this is not the case, the answer is no because of the cost of transport and the environmental implications. (050)

30. Support acknowledgement in para 42 of Issues Paper that Webheath ADR is only suitable for residential development and support the view that those ADR sites capable of accommodating employment development are allocated for that purpose. (045)

31. No, only use Brockhill ADR for employment. (080)

32. Is there a need with the shrinking of manufacturing? (052)

33. No. Site allocations for employment should be based on up-to-date environmental information and should be informed by infrastructure and other site constraints so that only the most sustainable developments come forward. ADRs that do not offer the best options in terms of sustainable transport solutions and would lead to high levels of commuting by staff should perhaps be allocated for other, more sustainable, mixed uses. (090)

34. Support for the Webheath ADR for early release as residential land. (053; 054; 055; 056; 057; 058; 059; 060; 061; 062; 063; 064; 065; 066; 067; 068; 069; 070; 071; 072; 073; 074; 075; 076; 077; 078; 079)

35. Consider that ADR land that can accommodate employment development should be used for economic development as defined by the Draft PPS4. (096)

36. The most sustainable option should be given precedence. Consideration should be given to improving the sustainability of Redditch by locating employment land in areas which do not facilitate commuting in to and out of the borough, especially by private car, but instead serve the needs of Redditch residents. This would benefit the local economy and lead to more sustainable travel patterns, reducing the Borough's carbon footprint. (088)

37. Judgement on regarding employment and usage of ADRs on criteria of community travel. (041)

38. Yes as far as Brockhill is concerned. (097)

39. Totally disagree that any development should take place on the A435 ADR, it should be left for the use that Redditch New Town Planners had the foresight to plan a new road to relieve traffic on the east and south of Redditch. (097)

40. Totally object to use of Webheath. ADR (041)

41. The coalescence of Redditch and Astwood Bank is discussed; however the potential coalescence of Redditch and Birmingham is omitted. (092)

42. The amount of employment land that may be appropriate on ADRs should not prejudice their capacity to contribute to the RSS housing provision as set out in the RSS Preferred Option. (021)

43. The context suggests that the balance between employment and housing provision on ADR land is debated in the Issues and Options document, but there is little in either document to allow an informed decision to be made. The sustainability of each form of development will have been examined through a previous Inspectors report and this could form the basis of any debate. (049)

Officers Response to comment(s)

1. Officers note the comment
2. Officers note the comment
3. Officers note the comment
4. This is noted as a possible use for ADR land; with regard to Webheath and A435 ADR, the alternative approaches for these parcels of land will be presented in the Preferred Draft Core Strategy.
5. This is noted as a possible use for ADR land; with regard to Webheath and A435 ADR, the alternative approaches for these parcels of land will be presented in the Preferred Draft Core Strategy.
6. The RSS identifies a target for employment land which is tested through an Employment Land Review, the Core Strategy will identify the appropriate employment land target.
7. The Employment Land Review has regard to existing vacant uses when considering the potential employment land target.
8. The RSS identifies a target for employment land and the number of new dwellings for the Borough.
9. The RSS identifies a target for employment land which is tested through an Employment Land Review, the Core Strategy will identify the appropriate employment land target.
10. This is acknowledged as a nationally recognised approach and the comment is noted.
11. The Employment Land Review has regard to existing vacant uses when considering the potential employment land target.
12. Officers note the comment
13. Officers note the comment
14. The employment land target cannot be met using previously developed land hence the need for this issue to be raised.
15. The employment land target cannot be met using previously developed land hence the need for this issue to be raised.
16. It is assumed that this means greenfield land and it is considered that it's inevitable that Greenfield land will be required.
17. Officers note the comment
18. Officers agree
19. This is noted as a possible use for ADR land; with regard to Webheath and A435 ADR, the alternative approaches for these parcels of land will be presented in the Preferred Draft Core Strategy.
20. This is noted as a possible use for ADR land; with regard to Webheath and A435 ADR, the alternative approaches for these parcels of land will be presented in the Preferred Draft Core Strategy.
21. This is not an appropriate response to this issue.
22. Officers agree
23. This is not an appropriate response to this issue.
24. Officers note the comment
25. Officers note the comment
26. This is not an appropriate response to this issue.
27. Officers note the comment
28. Officers note the comment
29. It is not considered that travel distances will determine likely land uses. In any case the majority of Redditch residents live within 3 miles of any of the Borough's ADR land. The alternative approaches for the ADR parcels of land will be presented in the Preferred Draft Core Strategy.
30. Officers note the comment
31. An assessment will be made of all strategic sites to assess their merits.
32. The RSS identifies a target for employment land which is tested through an Employment Land Review, the Core Strategy will identify the appropriate employment land target.
33. Officers agree
34. This is not an appropriate response to this issue.
35. Officers note the comment

- 36. Officers agree
- 37. It is not considered that travel distances will determine likely land uses. In any case the majority of Redditch residents live within 3 miles of any of the Borough's ADR land. The alternative approaches for the ADR parcels of land will be presented in the Preferred Draft Core Strategy.
- 38. Officers note the comment
- 39. This is noted as a possible use for ADR land; with regard to Webheath and A435 ADR, the alternative approaches for these parcels of land will be presented in the Preferred Draft Core Strategy.
- 40. Officers consider that the alternative approaches for this parcel of land will be presented in the Preferred Draft Core Strategy.
- 41. The Core Strategy will only consider Green Belt within the Redditch Borough.
- 42. Officers note the comment
- 49. Officers note the comment

Action to be taken with comment

None

Summary of Representations to Question 16

Question No.	16	Question Title	Redditch has a distinctive townscape and landscape which needs to be maintained and enhanced. If you agree with this, where are the important places in the Borough that need this protection?
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URN of Consultees

001; 002; 003; 004; 007; 010; 011; 012; 013; 014; 016; 017; 019; 023; 025; 030; 032; 033; 034; 035; 036; 041; 042; 049; 050; 051; 080; 083; 084; 088; 090; 095; 096; 097. Total of 34 Respondents.

Summary of Comment(s)

- 1. The area towards Hewell Park and Tardebigge should not be developed anymore. (016)
- 2. Cloverleaf junction. (017)
- 3. Stonepits copse. (017)
- 4. Highway verges and road islands. (017)
- 5. Designated and undesignated open spaces. (017)
- 6. All pathways and sustrans cycle ways. (017)
- 7. Arrow Valley Park/corridor and Morton Stanley park. (023) (034) (011) (032) (080) (017)
- 8. Appendices E, F, G of Local Plan No.3. (017)
- 9. Redditch is a brilliant 'Green' town; all landscape is important and should be protected. (010) (013)
- 10. Palace Theatre. (095)
- 11. Area around train station. (019)
- 12. Farmed areas adjoining the edge of town. (011)
- 13. All entry points to the town including the islands. (003)
- 14. Webheath ADR - a vital area for protection since it was designated as such. Consider it is unsustainable for both housing and employment use and as it is outside the urban area, it should be treated the same as green belt. (036) (084)
- 15. Retain 50% of Plymouth Rd Golf Club. (036)
- 16. Every green space not yet built on. (035)
- 17. All green areas and trees. (012)
- 18. Redditch Built area. (042)
- 19. All green spaces, nature reserves, parks etc. (012) (007)
- 20. Hunt End (050) (034)

21. St Stephens Church (032)
22. Church Green and periphery area. (004) (080) (033)
23. Amenity areas. (033)
24. Town Centre. (001)
25. The area between Astwood Bank and Feckenham. (004)
26. Feckenham and Ham Green. (001) (004)
27. Elcocks Brook to Webheath. (004)
28. Also work to reduce traffic flow along the A441 to protect existing development there. (004)
29. Yes, I want a green and pleasant land with easy access to services like the villages and towns of the past, but with good access. (002)
30. Within the Redditch built area. (042)
31. Any policies for the maintenance and enhancement of the townscape and landscape for Redditch need to be formulated in accordance with the overall vision for the Borough and the need for the Core Strategy to conform to the RSS. The RSS housing requirement (6,600 dwellings) for Redditch together with employment will be the principle driver of the vision for Redditch. (030)
32. Do not keep extending the townscape of Redditch i.e. stop further development towards Studley. (095)
33. The area around Beoley Abbey. (050)
34. Public open spaces are important and should be preserved and maintained. (023) (083)
35. No one area has a priority (051)
36. The old cemetery in Cemetery Lane/Plymouth Rd. (080)
37. Woodland – various locations (080)
38. The old railway cutting off Tunnel Drive – turn it into a proper conservation area with safe public access. (080)
39. We are pleased to support the idea that the distinctive ‘greenness’ of Redditch should be maintained and enhanced. To that end we would strongly suggest that all Biodiversity Action Plan habitats, Special Wildlife Sites and SSSIs should be protected and enhanced. (088_090)
40. Arrow Valley corridor to be protected as an area of high value both for biodiversity and wider public benefit. (088)
41. Support a policy requiring Green Infrastructure provision in new developments. Green Infrastructure should be designed to reflect locally native biodiversity and should aim to enhance and link existing sites and habitats. (088)
42. The statutorily protected buildings and designated areas need protection. (096)
43. Acknowledge that the development of Redditch will need to achieve high standards of design, and that an essential part of any scheme will be its connectivity with the town centre. (096)
44. Areas around Church need protection. (041)
45. Water towers should be protected for the fact of what they are, a source of life given by our forefathers. (097)
46. Buffer zones to Astwood Bank and Feckenham. (097)
47. Redditch Council does an essential job.
48. WCC Landscape Character Assessment can be a useful tool, make reference to this in the Core Strategy.

Officers Response to comment(s)

1. The area toward Hewell park and Tardebigge is not within the administrative boundary of Redditch
2. It is noted and this may be considered for inclusion in the Distinctiveness Document.
3. Stonepits Copse is designated as Primarily Open Space.
4. It is not considered that these are distinctive and valuable enough for protection.
5. This will be protected through other means.
6. It is not considered that these are distinctive and valuable enough for protection.
7. This will be protected through other means.
8. This will be protected through other means.

9. Up to date landscape evidence will inform areas of high sensitivity to change and this will inform a Core Strategy policy.
10. This will be protected through other means.
11. It is anticipated that this will be a strategic site for the delivery of the Core Strategy.
12. Up to date landscape evidence will inform areas of high sensitivity to change and this will inform a Core Strategy policy.
13. It is not considered that these are distinctive and valuable enough for protection.
14. The alternative approach for this parcel of land will be presented in the Preferred Draft Core Strategy.
15. This will be protected through other means.
16. Response is not specific enough.
17. Response is not specific enough.
18. Response is not specific enough.
19. Response is not specific enough.
20. Response is not specific enough.
21. This will be protected through other means.
22. This will be protected through other means.
23. This will be protected through other means.
24. Response is not specific enough.
25. Up to date landscape evidence will inform areas of high sensitivity to change and this will inform a Core Strategy policy.
26. Up to date landscape evidence will inform areas of high sensitivity to change and this will inform a Core Strategy policy.
27. Up to date landscape evidence will inform areas of high sensitivity to change and this will inform a Core Strategy policy.
28. Officers note the comment
29. Officers note the comment
30. Response is not specific enough.
31. Officers agree
32. This is not an appropriate response to the issue.
33. It is assumed this comment refers to Beoley Church, however the church is not within the administrative boundary of Redditch.
34. This will be protected through other means.
35. Officers note the comment
36. It is not considered that these are distinctive and valuable enough for protection.
37. Response is not specific enough.
38. Some of the railway cutting is already designated as Primarily Open Space. The Core Strategy would not preclude this area becoming a nature conservation area and will be suggested to the Council's Biodiversity Officer for consideration.
39. This will be protected through other means.
40. The designation of SWS, SSSIs, LNRs etc is a function outside of the planning system.
41. This is not an appropriate response to the issue; however, Policy SR2 of the RSS Phase 2 Revision Draft Preferred Option Document requires a Green Infrastructure Network in order to create a sustainable community.
42. This will be protected through other means.
43. Officers note the comment
44. Response is not specific enough.
45. The old water tower is already protected by other means. The new water tower is already included in the Distinctiveness Document.
46. Up to date landscape evidence will inform areas of high sensitivity to change and this will inform a Core Strategy policy.
47. Officers note the comment
48. Officers agree

Action to be taken with comment

38. Suggest Railway cutting off Tunnel Drive to Biodiversity Officer for consideration.

Summary of Representations to Question 17

Question No.	17
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Question Title	Are there any buildings that you think should be added to the Schedule of Buildings of Local Interest? Please give details
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URN of Consultees

002; 003; 004; 007; 011; 016; 017; 023; 028; 032; 050; 052; 080; 096; 097. Total of 15 Respondents.

Summary of Comment(s)

1. Any old Victorian factories or farm buildings – High house farm near The Dog pub. (016)
2. Southcrest Lodge (017)
3. Former cinema now nightclub (011)
4. Older unspoilt pubs that may get redeveloped (007) (011)
5. All Town Centre facades (003)
6. Policies to protect historic buildings or areas should be considered, however this should not simply be to repeat national policy. (028) (096)
7. It is not appropriate to include provision for a local list in the Core Strategy. (028)
8. Halfords head office - a typical 60's concrete building and should be listed. (007)
9. GKN an old building of character and some churches. (007)
10. Millsborough House (007)
11. Smallwood Hospital (032)
12. Old library (032)
13. Forge Mill (023) (032)
14. Old water tower, Headless Cross (032) (080)
15. Bordesley Abbey and environs (002) (023)
16. Astwood Bank C of E Church (004)
17. Astwood Bank First School (004)
18. Feckenham First School (004)
19. Red Lion Pub. Hunt End (050)
20. The old railway tunnel that runs under part of the town (080)
21. Holmwood House – now apartments. (080)
22. Perhaps the two old chapels on the old cemetery in Cemetery Lane/Plymouth Rd. (080)
23. Is there anything of merit left in Redditch? (052)
24. Most of them have been demolished! (097)
25. Palace theatre (097)
26. Needle Museum. (097)
27. Take account of the impact of proposals on buildings of local interest. (096)

Officers Response to comment(s)

1. This response does not suggest specific buildings. High house farm is not within the administrative boundary of Redditch Borough, it lies within Stratford upon Avon District. Some Victorian buildings do not have any special characteristics which warrant inclusion on the local list.
2. This will be investigated for inclusion on the local list.
3. This is already included on the local list.
4. This response does not suggest specific buildings. Some older pubs do not have any special characteristics which warrant inclusion on the local list. Some may already be listed or

on the local list.

5. A conservation area covers the older parts of the Town Centre. Some of these buildings are listed or already included on the local list. Some of the buildings do not have any special characteristics which warrant inclusion on the local list.

6. Officers note the comment

7. Officers note the comment

8. This will be investigated for inclusion on the local list.

9. GKN will be investigated for inclusion on the local list. The majority of churches within Redditch Borough are already listed or included on the local list. Some churches do not have any special characteristics which warrant inclusion on the local list.

10. This is already included on the local list.

11. This is already included on the local list.

12. This is already included on the Schedule of Buildings of Local Interest.

13. This is already a statutory listed building.

14. This is already included on the local list.

15. This is already a statutory listed building.

16. This is already included on the local list.

17. This will be investigated for inclusion on the local list.

18. This will be investigated for inclusion on the local list.

19. This will be investigated for inclusion on the local list.

20. The former railway tunnel was considered for inclusion on the local list in 2005 and failed to justify inclusion.

21. This is already a statutory listed building.

22. This will be investigated for inclusion on the local list.

23. Officers note the comment

24. Officers note the comment

25. This is already a statutory listed building.

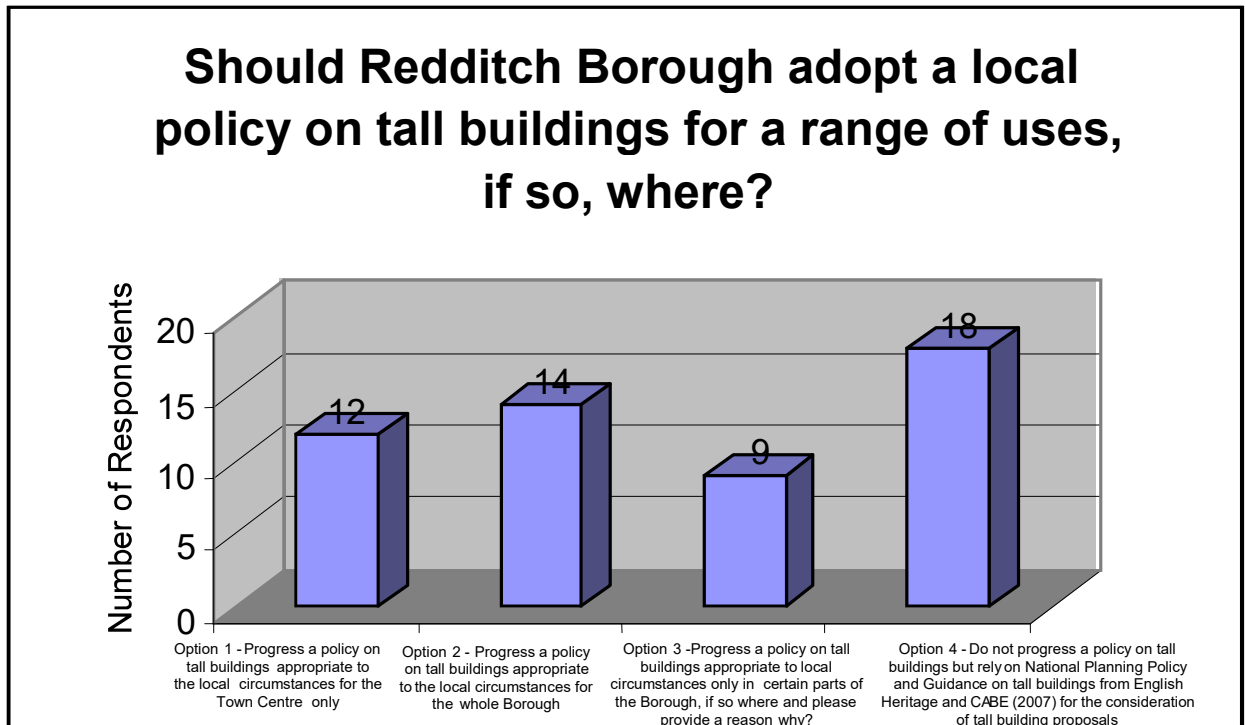
26. This will be investigated for inclusion on the local list.

27. Officers note the comment

Action to be taken with comment

1. Consider suggestion 2, 8, 17, 18, 19, 22, 26 for inclusion on the local list.

Response to Question 18



Summary of Representations to Question 18 Option 3.

Question No.	18
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Question Title	Should Redditch Borough adopt a local policy on tall buildings for a range of uses, if so, where? <i>Option 3 – Progress a policy on tall buildings appropriate to local circumstances only in certain parts of the Borough, if so where and please provide a reason why?</i>
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URN of Consultees

011; 028; 036; 041; 052; 082; 084; 092; 097. Total of 9 Respondents.

Summary of Comment(s)

1. The Borough is mainly low rise and no taller buildings are desirable. (011)
2. Consideration should be given to this issue if it is identified locally (regardless of national

- guidance). (028) (084)
3. If the issue is identified It may be appropriate to include the matter in an overall design or built environment policy. (028)
 4. Policy should state only 3 storeys high. (036)
 5. Each case should be looked at on its own merits. (082)
 6. Will members of the public know what CABE is? (092)
 7. Tall buildings are acceptable in land use terms and should be acceptable in certain locations. (052)
 8. Nice to travel along A435 down Gorcott Hill to see the Church spike like a needle outlined against the height of the town, with only the NEW college relieving it. (04 1)
 9. Do not construct tall buildings elsewhere in the Borough as they would become eyesores in the landscape. (097)

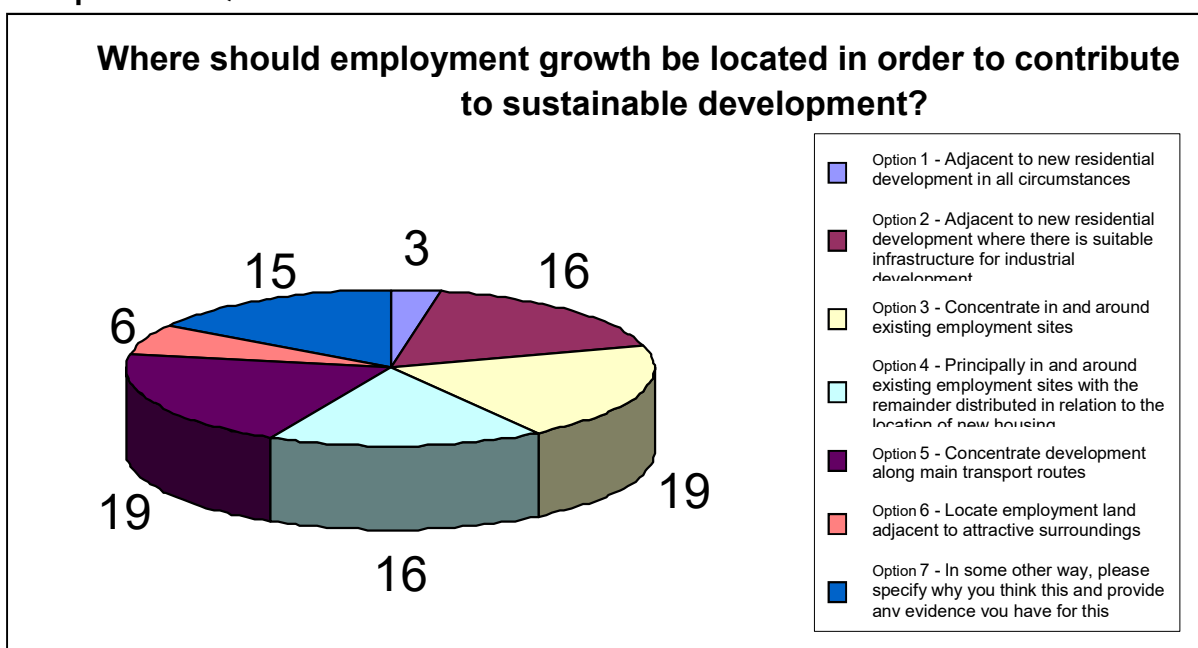
Officers Response to comment(s)

1. Noted
2. Noted
3. Noted
4. Noted
5. Noted
6. CABE is included in the List of Abbreviations at the back of the Issues and Options Document. Where terminology like CABE is referred to, a comprehensive glossary will explain their meaning.
7. Noted
8. Noted
9. Noted

Action to be taken with comment

6. Consider including CABE into the Glossary.

Response to Question 19



Summary of Representations for Question 19

Question No.	19
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Question Title	Where should employment growth be located in order to contribute to sustainable development? <i>Option 7 – in some other way, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

007; 017; 027; 030; 031; 035; 040; 048; 049; 084; 090; 093; 094; 096; 097. Total of 15 Respondents.

Summary of Comment(s)

1. Concentrate on using empty B8 warehousing and office blocks first. (017)
2. Consideration needs to be given to accessibility by, and facilities for, sustainable modes of transport i.e. walking, cycling and public transport. The use of sustainable transport as an alternative to the private car should be promoted and encouraged through the implementation of workplace travel plans. This would minimise the impact of commuting on the Strategic Road Network. (027)
3. Too many cars - travel difficult and expensive. (035)
4. If there were better bus routes, this could be a main option from residential to industrial (option 4). (007)
5. In advance of the completion of the Employment Land Review, it would be premature to attempt to establish a policy framework for the delivery of new employment land. (048)
6. Phase in mechanisms for employment to be prioritised on previously developed land. (040)
7. Have regard for local landscape and environmental factors although be attractive to investors. (040)
8. New employment land should be focused on land with good accessibility. These appropriate locations are considered to be IN67 at Brockhill, land to the rear of the Alexandra Hospital, land east of railway at Brockhill ADR, ADR in Bromsgrove District adjacent to Ravensbank Business Park, new allocations as part of the Sustainable Urban Extension to Redditch at Brockhill North and West to north west of Redditch. If residual requirements

overall remains to 2026, the land south of Foxlydiate junction on A448 should be considered. (031)

9. [Answer applies to Q.19 – Q.24] Employment land allocations need to meet the needs of modern business including good accessibility on land which is attractive and viable for its end use. Strategic Employment land requirements should be established in the Core Strategy in conjunction with an employment land review. Land no longer suitable for employment should be allocated for other uses in lower order DPDs, unless these sites are strategic, in which case they can be considered in the Core Strategy. (030)

10. Few people would wish to live adjacent to employment sites. As such, it is vital to keep them away from housing as much as possible. (084)

11. SFRA informs how future employment growth will be distributed. Note that option 2 mentions locating development where there is suitable infrastructure and this should include drainage and water supply. (093)

12. Development should be focussed on key transport corridors where the infrastructure is in place or can be adapted. (094)

13. Site allocations falling under options 1-6 must all be based on up-to-date ecological information with respect to environmental limits and should be designed in such a way as to add to local Green Infrastructure. (090)

14. Support Option 4 although the options will need to take account of the housing and employment figures contained in the RSS Phase Two Revision. In the context of Redditch, it will be important to ensure that the opportunity to provide significant amounts of housing in close proximity to new employment is fully exploited. This could contribute to improving the overall balance of housing and employment growth within the Borough. (096)

15. Concentrate on providing adequate transport routes to take existing traffic to the east and south. (049) (097)

Officers Response to comment(s)

1. Regardless of any existing warehouse and office blocks, the RSS employment target is for new employment growth.

2. The location of employment will have to be considered against sustainability and this includes accessibility to sustainable modes of transport.

3. This response is not related to the issue.

4. Officers consider this is an issue if option 4 is to be implemented.

5. Officers agree but it was still considered relevant to include it as an issue.

6. Some Employment sites will be phased however it is considered that a balanced portfolio of Employment Land is required to be in accordance with the RSS.

7. Landscape and environmental factors will be covered by other aspects of the Core Strategy. The Employment Land Review will identify new sites for employment land based on the requirements of existing employers and past trends.

8. Officers agree that employment land should be focussed on land with good accessibility. The employment land Review will consider the suitability of all existing employment sites and look at the potential for new areas for employment and this will inform the Core Strategy.

9. Officers agree that employment land needs to meet the need of businesses, be accessible and attractive and this will be informed by the Employment Land Review. Land or site which have been determined as unsuitable for employment uses will be considered for their potential for other uses as part of the Employment Land Review.

10. Officers note the comment

11. Officers note the comment

12. Officers note the comment

13. This would have to be ensured in the Core Strategy but does not present an option for this issue.

14. Officers note the comment

15. Infrastructure needs to be in place or subsequently in place as the WMRSS Para 6.24 states "infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development".

Action to be taken with comment

None

Summary of Representations to Question 20**Question No.** 20**Question Title** Do you think the indicative long term requirement is appropriate for Redditch Borough needs?**URN of Consultees**

002; 004; 007; 017; 023; 024; 031; 036; 039; 042; 051; 052; 081; 083; 084; 096; 097. Total of 17 Respondents.

Summary of Comment(s)

1. No. (036) (017)
2. This should be defined following completion of a detailed Employment Land Review. (042)
3. It would have to be, as no one can predict changes exactly you need a starting point. (007)
4. Yes. (023) (002) (024) (051) (097) (039) (081) (083)
5. RRS approach to employment land is flawed and not sufficiently flexible. The specific proposals for Redditch on a cross-boundary basis do not have an appropriate evidence base. (031)
6. Don't know and suspect no one else does. Any estimate would need regular revision. (004)
7. Absolutely not. Redditch will always be mainly residential with most of its inhabitants travelling to work in the adjacent main urban areas of Birmingham, Worcester, Stratford and Solihull. The WMRSS figures are totally flawed in this area as Redditch will be unable to achieve this level without using Green Belt land, which must be strongly resisted. (084)
8. Yes, most industry is scaling down particularly through micro technologies emerging. (052)
9. At this stage we consider the long term requirement to be appropriate given the figures set out in Table 4 of the Phase Two Revision of RSS11. It is acknowledged that the figures are indicative rather than targets, and intended to provide spatial guidance. (096)
10. Concerned by lack of skills. (041)

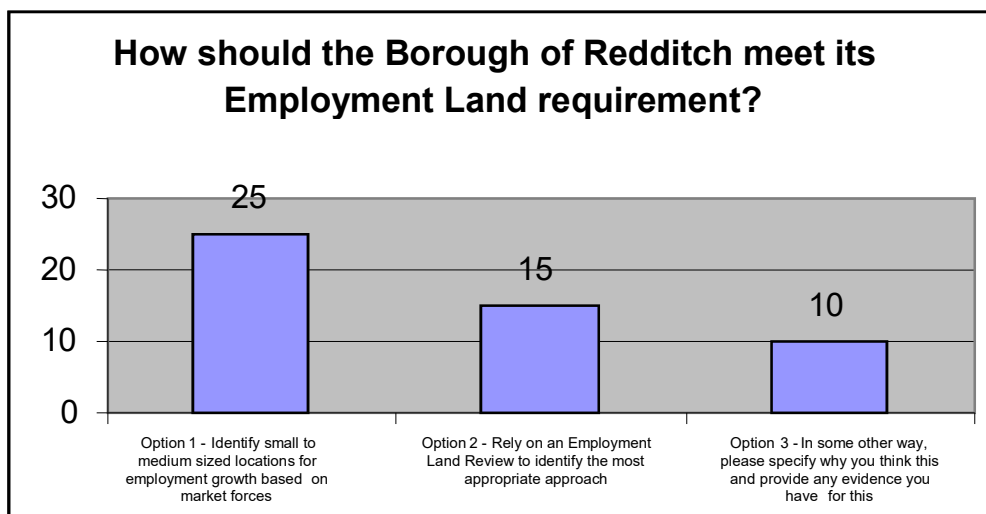
Officers Response to comment(s)

1. Officers note the comment
2. An Employment Land Review will inform the Core Strategy.
3. Officers note the comment
4. Officers note the comment
5. This is not a matter for the Core Strategy to resolve, this is an issue for the RSS.
6. Officers note the comment
7. The approach taken through the RSS is not a matter for the Core Strategy. The Core Strategy will have to be flexible enough to account for changing circumstances. The evidence base of the Core Strategy will demonstrate that there is no need to use the Green Belt land in the Redditch Borough's Rural south west.
8. Officers note the comment
9. Officers note the comment
10. It is envisaged that the Core Strategy will attempt to establish links with higher and further education institutions to tap into High Technology Corridor Industry.

Action to be taken with comment

None

Response to Question 21



Summary of Representations to Question 21 Option 3

Question No.	21
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Question Title	How should the Borough of Redditch meet its Employment Land requirement? <i>Option 3 – in some other way, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

003; 007; 021; 031; 049; 083; 084; 093; 096. Total of 9 Respondents.

Summary of Comment(s)

1. By the law of supply and demand (003)
2. Option 1 - who identifies? (007)
3. Option 2 - how is this done? (007)
4. Contact local businesses and find out what land is available. (007)
5. There is a need to establish employment land requirements by an employment land review. There will need to be some flexibility in where employment land is developed. In relation to land North West of Redditch, there is a need to provide employment land within or close to the site (031)
6. Concentrate in and around existing employment sites. (083)
7. SFRA/Water Cycle Study should inform how future employment growth will be distributed. (093)
8. The employment land requirement of Redditch should be met through a combination of Options 1 & 2. (021) (096)
9. Do not support Option 1. The inclusion of an exemptions policy would be supported. (049)
10. Resist the imposition of the WMRSS targets as unachievable. (084)

Officers Response to comment(s)

1. The RSS provides the Core Strategy with its targets for supply of employment land
2. This comment is not suggesting an alternative option for this issue. The Employment Land Review will identify new sites for employment land based on the requirements of existing employers and past trends.
3. This comment is not suggesting an alternative option for this issue. The Employment Land

Review will identify new sites for employment land based on the requirements of existing employers and past trends.

4. This comment is not suggesting an alternative option for this issue. The Employment Land Review will identify new sites for employment land based on the requirements of existing employers and past trends.

5. The Employment Land Review will consider the suitability of all existing employment sites and look at the potential for new areas for employment and this will inform the Core Strategy.

6. This is option 3 of Question 19 in the Issues and Options Document.

7. Officers agree with this comment.

8. Officers note the comment

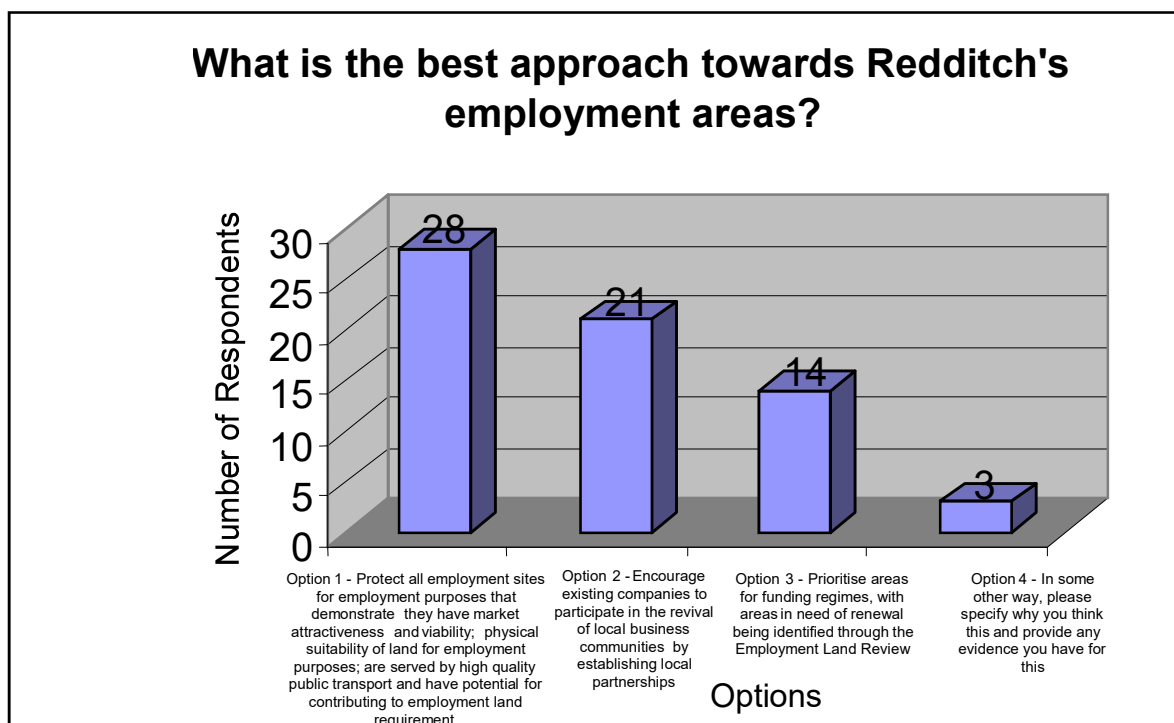
9. Officers note the comment

10. This comment is not suggesting an alternative option for this issue. The Employment Land Review will identify new sites for employment land based on the requirements of existing employers and past trends.

Action to be taken with comment

None

Response to Question 22



Summary of Representations to Question 22 Option 4

Question No.	22
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Question Title	What is the best approach towards Redditch's employment areas? Option 4 – <i>in some other way, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

031; 042; 088; 096. Total of 3 Respondents.

Summary of Comment(s)

1. Employment Land Review. (042)
2. There is a need to protect employment sites that are attractive and viable. There is no need to keep existing employment stock that no one wants to redevelop for employment use. (031)
3. Land at North West Redditch can provide land to form part of the requirements that are needed for employment uses. There is an immediate need for the employment land review to be carried out, as this will demonstrate the best sites that should be saved for employment use. (031)
4. Land should be used in the most sustainable way. Therefore any combination of the above Options which secures this outcome would be supported. (088)
5. It is important that a flexible approach is adopted to take account of changing economic circumstances. (096)

Officers Response to comment(s)

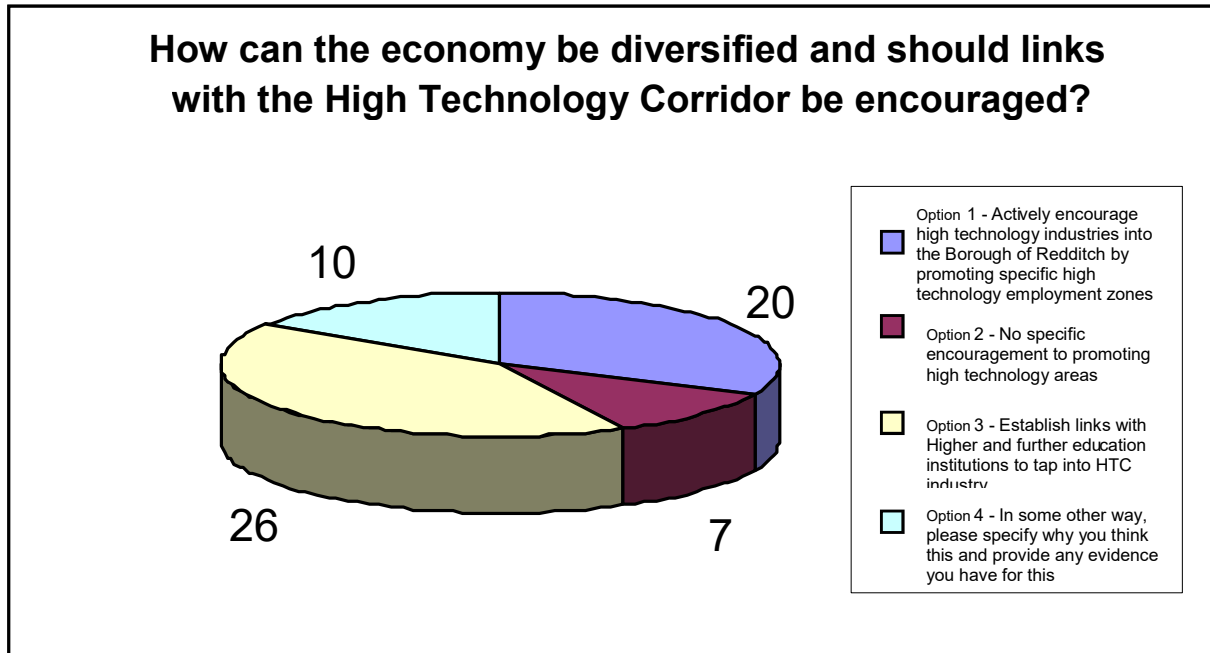
1. Officers agree, existing employment sites will be considered in the Employment Land Review.

2. The Employment Land Review will consider the suitability of all existing employment sites and look at the potential for new areas of employment and this will inform the Core Strategy.
3. The Employment Land Review will consider the suitability of all existing employment sites and look at the potential for new areas of employment and this will inform the Core Strategy.
4. Noted.
5. The Core Strategy will need to adopt a flexible approach.

Action to be taken with comment

None.

Response to Question 23



Summary of Representations to Question 23 Option 4

Question No.	23
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Question Title	How can the economy be diversified and should links with the High Technology Corridor be encouraged? <i>Option 4 - In some other way, please specify why you think this and provide any evidence you have for this?</i>
-----------------------	---

URN of Consultees

002; 017; 021; 035; 042; 052; 084; 095; 096. Total of 10 Respondents.

Summary of Comment(s)

1. Best training possible for top class jobs. (035)
2. Employment Land Review. (042)

3. Provide research facilities for molecular manufacture - a new form of nanotechnology. (002)
4. Understand that the HTC is not in the Borough of Redditch. Therefore how does this satisfy WMRSS for providing employment within the Borough? Surely it will encourage people to travel outside Redditch for employment. (084)
5. Target specific High Technology Sector (then 1). (052)
6. The diversification of the local economy is supported as set out in the RSS11 Phase Two Revision. However no specific encouragement to promoting high technology areas should be made and the RSS policy provides adequate encouragement and guidance. (096)
7. This would encourage local further education establishments to demonstrate more interest in the town and its residents. (095)
8. Enhance Prospect Row / Johnsons / British Mills - evidence from planning permission.
9. The Core Strategy should not promote the inclusion of Redditch in the High Technology Corridor; Option 3 could be interpreted as seeking to achieve this.

Officers Response to comment(s)

1. Establishing links with higher and further education institutions to tap into High Technology Corridor Industry is already presented as an option. It is considered that this is the only way the Core Strategy can encourage an improvement in skills.
2. The Core Strategy will be informed by an Employment Land Review.
3. The type of employment uses as suggested is too detailed for the Core Strategy.
4. Redditch is in the sphere of influence of the HTC but not within it. As a separate issue in the Core Strategy, Redditch Borough will provide the RSS requirements for employment as required within its own boundaries.
5. It is feasible for the Core Strategy to seek to diversify its economy and one method of doing this is to integrate with the High Technology Corridor.
6. Officers note the comment
7. Officers note the comment
8. Much of this suggested has already received planning permission and has been implemented.
9. It was not the intention of Option 3 to refer to Redditch being included within the High Technology Corridor and this is not likely to be pursued as an Option in the Preferred Core Strategy.

Action to be taken with comment

None.

Summary of Representations to Question 24

Question No.	24	Question Title	Should there be greater support for economic 'clusters' within the Borough in order to strengthen the economy?
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URN of Consultees

001; 002; 004; 007; 011; 017; 023; 024; 032; 033; 035; 039; 041; 042; 051; 052; 080; 081; 083; 095; 096; 097. Total of 22 Respondents.

Summary of Comment(s)

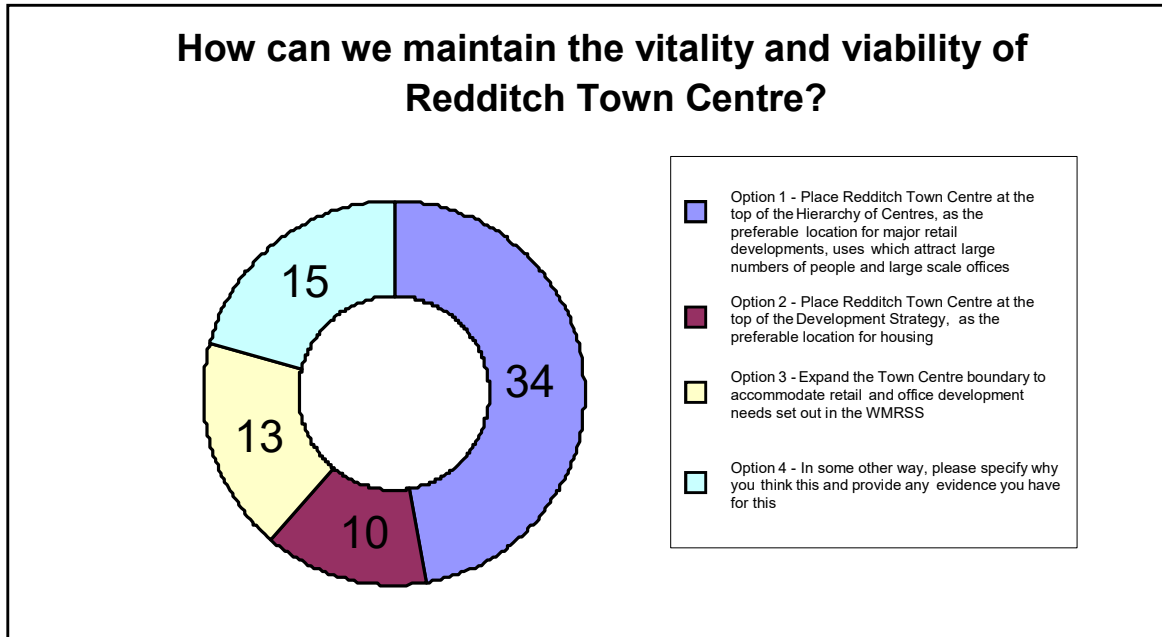
1. This is debatable and should be tested. (023)
2. It is worth considering the approach taken in Italy where small clusters are used for specialist trades – is this able to be replicated? (011)
3. General economic support for everyone as and where necessary. (035)
4. Employment Land Review should be completed before this is determined. (042)
5. Definitely - what happened to British Aluminium etc, Studley Road had other businesses that are now housing estates. (007)
6. Yes. (001) (002) (017) (024) (032) (035) (039) (051) (097) (033) (080)
7. There should not be expansion of existing areas. (033)
8. Yes but not sure what form this support should take - active marketing? Tax breaks? (004)
9. No – not necessary (083) (095)
10. Yes, medical /pharmaceutical (052)
11. Yes if the areas would otherwise decay or die. (081)
12. There should be greater support to economic clusters (096)
13. Not sure what this means 'low cost' start-up units. Depends upon entrepreneurial backbone - do Redditch youngsters have this? (041)

Officers Response to comment(s)

1. Consultation with Advantage West Midlands and consideration of the West Midlands Regional Economic Strategy suggest that where appropriate, a cluster policy should be developed.
2. There will be nothing in the Core Strategy that would preclude this from happening in Redditch. There is no National or Regional planning policy that encourages clustering of specialist trades.
3. Officers note the comment
4. An Employment Land Review will inform the Core Strategy.
5. Officers note the comment
6. Officers note the comment
7. This response does not relate to the question. The Employment Land Review will consider the suitability of all existing employment sites and look at the potential for new areas for employment and this will inform the Core Strategy.
8. Where there are distinctive strengths in areas such as clusters, it is possible to facilitate business collaboration in the specific clusters. Collaboration should be encouraged between clusters and bodies such as Advantage West Midlands.
9. Officers note the comment
10. Medical technologies are noted in the Issues and Option Document as an existing cluster in the Borough.
11. Officers note the comment
12. Officers note the comment
13. Clusters are described within the Issues and Options document; however, as a point of clarification it does not mean low cost start up units. In relation to entrepreneurial backbone etc. the question specifically relates to existing economic clusters and not establishing new clusters. The purpose of a cluster policy would be to enhance the existing clusters rather than experimenting with new economic areas.

Action to be taken with comment

None

Response to Question 25**Summary of Representations to Question 25 Option 4**

Question No.	25
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Question Title	How can we maintain the vitality and viability of Redditch Town Centre? <i>Option 4 – in some other way, please specify why you think this and provide any evidence you have for this</i>
-----------------------	---

URN of Consultees

003; 017; 020; 027; 030; 043; 044; 049; 050; 080; 083; 084; 089; 096; 097. Total of 15 Respondents.

Summary of Comment(s)

1. Enhance Prospect row / Johnson's/ British Mills. (017)
2. Spend money on the Theatre. (003)
3. Close the public houses. (003)
4. The need for convenience retail floor space is not confirmed. (020)
5. The Core Strategy should contain a realistic summary of the need for both comparison and convenience retail development in the Borough, taking account of both quantitative and qualitative considerations, (which should be informed by an update to date retail study, required by PPS 6). (020)
6. The requirement to expand retail centres should be examined as part of the preparation of a retail study. (020)
7. Option 1 should be supported by improving sustainable transport links to the Town Centre to avoid the use of the private car. (027)
8. Maintaining quality and diversity is critical for the Council's intention to promote the vitality of Redditch. The approach taken in the past fails to reflect the important role played by financial

service retailers in promoting vitality, underpinning town centres and assisting in regeneration. The current policy approach (Local Plan No.3) restricts anything other than A1. ODPM Circular 03/2005 states that financial services are part of the established shopping street scene. The current approach should not be carried forward to the LDF. (044)

9. Any retail policies in the emerging strategy should be founded on a credible and robust evidence base. (085)

10. A vibrant town centre is essential to ensure the implementation of the vision. (030)

11. Major new development should be directed to Redditch Town Centre where suitable sites are available; however, where such sites are unavailable, sites in the peripheral zone should be considered. (043)

12. Some of the capacity identified in RSS (figures given) can be accommodated through further development at Trafford Retail Park. This is an existing retail destination which already plays a major role in retailing in Redditch. It has good links to the town centre and is located within the designated peripheral zone. (043)

13. Redditch town centre should provide and maintain a range of realistic functions for leisure, recreation and cultural activities centred on restaurants, pubs, clubs, theatres, cinemas, libraries and museums. Cultural facilities include a range of uses that would add greater diversity to the cultural scene. (089)

14. The retail centre cannot physically accommodate the growth required by WMRSS and therefore the figures should be revisited. (084)

15. Demolish and start again. (050)

16. Maintain and protect the current vitality and viability appropriately by concentrating upon what is, not what might be. (083)

17. Solve the major problem of car parking. Do the impossible and get car parking fees in the town centre car parks reduced significantly. (080)

18. Options 1, 2, and 3 would require much more investigation before they are taken forward into a Core Strategy, focussing in particular on their deliverability. (096)

19. Whatever option is chosen, it is hoped that it will recognise the need to include waste storage and collection, and sufficient space for vehicles to manoeuvre to collect any such wastes. (049)

20. Reduce the high vacancy rate, encourage some smaller and varied shop owners. (097)

Officers Response to comment(s)

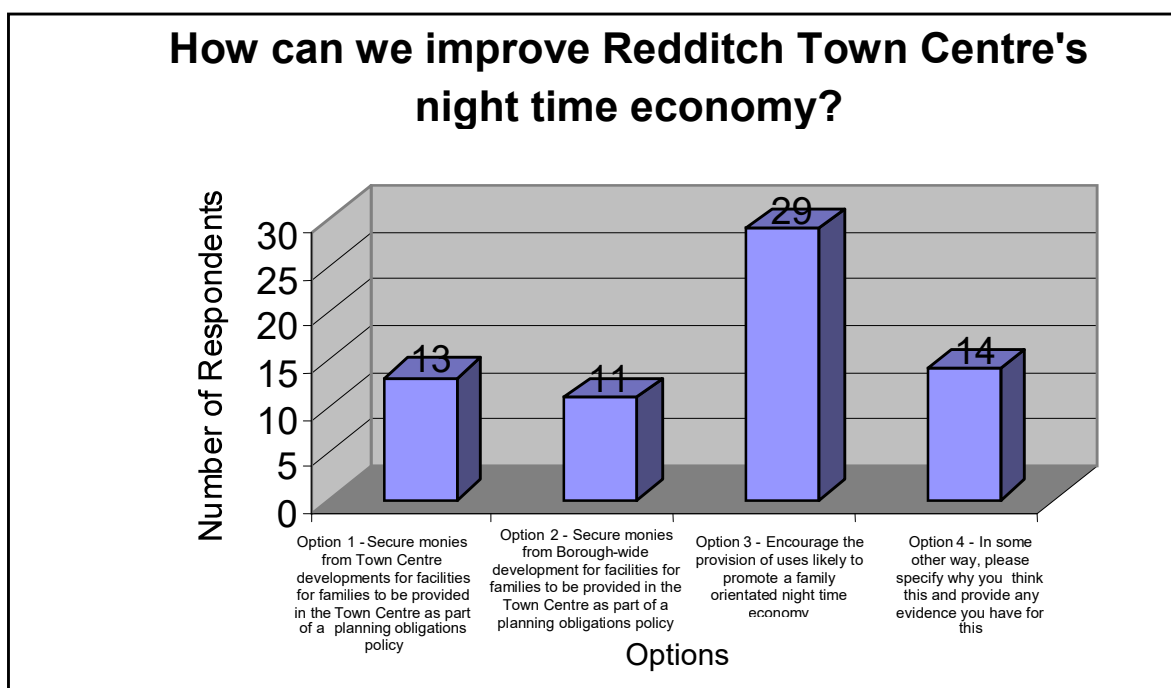
1. Officers envisage a site on Prospect Hill will continue to be allocated as a strategic site. None of the sites suggested are within the designated Town Centre boundary.

2. This is not a spatial planning matter.
3. The Retail and Leisure Needs Assessment recommends that bars and restaurants should be encouraged in the Town Centre to improve vitality and viability.
4. The Retail Needs Assessment has confirmed the floor space requirements for convenience retail.
5. Officers agree.
6. Officers agree.
7. Officers agree.
8. It is too early to establish the exact policy approaches and this will be considered in preparation of the Preferred Core Strategy.
9. Officers agree.
10. Officers agree.
11. Officers agree that a recommended approach is to focus appropriate development in the Town Centre as per option 1. The Retail Needs Assessment considers all sites within or adjacent to the Town Centre.
12. Trafford Retail Park is already developed.
13. Officers agree.
14. If the town centre cannot physically accommodate the growth it would be appropriate to consider the option of extending the town centre boundary.
15. This is not a realistic sustainable option.
16. Planning policy must consider future need and make provision for it accordingly.
17. This is not a spatial planning matter.
18. Officers agree.
19. It is envisaged that these considerations will either be incorporated into the Core Strategy or are already development control considerations.
20. The vacancy rate is currently in line with national rates. Planning policy can have very little control over the vacancy rates and the type of shop owner.

Action to be taken with comment

None.

Response to Question 26



Summary of Representations to Question 26 Option 4

Question No.	26
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Question Title	How can we improve Redditch Town Centre's night time economy? <i>Option 4 - in some other way, please specify why you think this and provide any evidence you have for this.</i>
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URN of Consultees

003; 011; 012; 028; 030; 035; 036; 042; 082; 083; 084; 089; 095; 097. Total of 14 Respondents.

Summary of Comment(s)

1. Rebuild Palace Theatre as original. (011)
2. Close the Pubs. (003) (036)
3. The night time economy should be considered in terms of mixed uses, design, social inclusion and community safety. (028)
4. Make the Town Centre safe for them to be there. (035)
5. It's a poor town. Sport/leisure should be free to town people. (012)
6. Support the development of the night time economy; commercial leisure facilities; mixed use development. (042)
7. Planning obligation requirement for money to provide facilities for families in Town Centre must meet tests in 05/2005. (030)
8. Commercial facilities for families will be provided by the market without intervention from the Council other than through its normal regulatory powers. (030)
9. Do not agree with any of the options put forward. (095)
10. Too many licensed premises can have a harmful effect such as noise, disturbance, litter, anti-social behaviour, parking and traffic. They would also harm the character and primary function of the Town Centre. Food and drink venues can be regulated to cater for over 25s and families. (089)

11. Restrict planning applications for licensed premises. (084)
12. Improve policing of Town Centre at night and apply the existing rules and regulations (law) rigidly. (083)
13. Why would you want to do this? If you increase housing in the town there would be a conflict – look at Brindley Place/Broad Street in Birmingham and the adjacent residential areas, there is a number of problems caused by evening and late night drinking. (082)
14. Lower taxi fares, or re-introduce evening bus services up to 11pm or 11.30pm. (097)

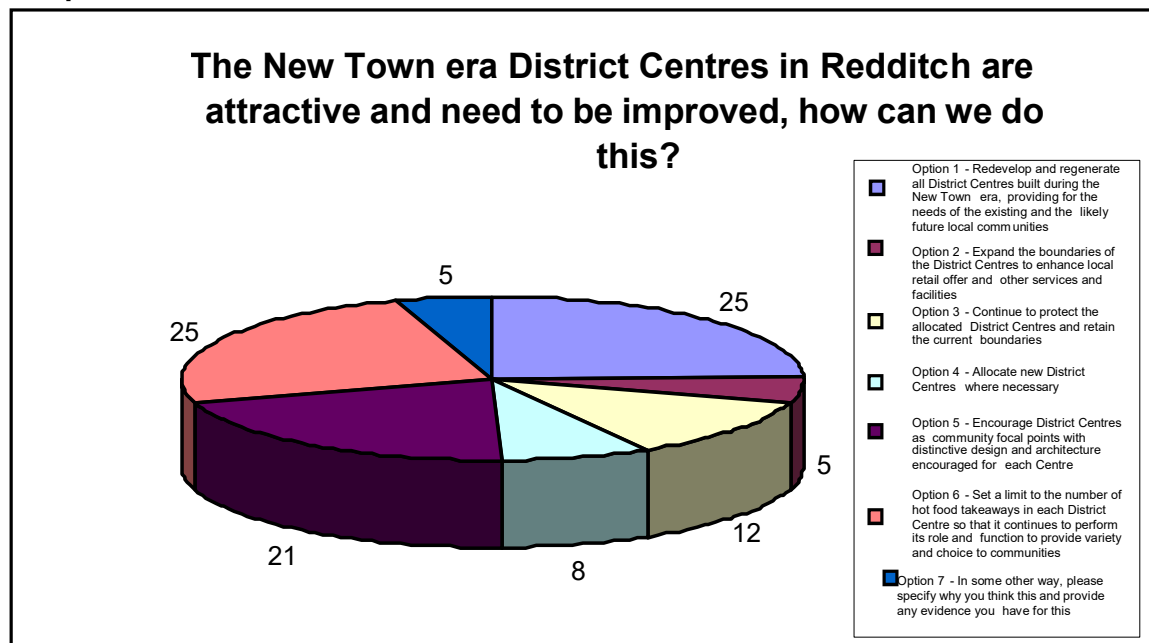
Officers Response to comment(s)

1. This is not a realistic option.
2. The Retail and Leisure Needs Assessment recommends that bars and restaurants should be encouraged in the Town Centre to improve vitality and viability.
3. Officers agree that the night time economy should be considered in terms of mixed uses, social inclusion and community safety. Design has a less established link to improving the night time economy.
4. Officers agree.
5. This is not a spatial planning matter.
6. Officers agree.
7. Officers agree.
8. Officers agree.
9. Noted
10. The Retail and Leisure Needs Assessment recommends that food and drink venues should be encouraged in the Town Centre and that this would not harm the character and function. Other matters raised above, such as age regulation, are controlled by the Council's licensing department.
11. The Retail and Leisure Needs Assessment recommends that food and drink venues should be encouraged in the Town Centre and that this would not harm the character and function. Other matters raised above, such as age regulation, are controlled by the Council's licensing department.
12. This is not a spatial planning matter.
13. An evening economy is essential to achieving a vital and viable town centre.
14. This is not a spatial planning matter.

Action to be taken with comment

None

Response to Question 27



Summary of Representations to Question 27 Option 7

Question No.	27
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Question Title	The New Town era District Centres in Redditch are not attractive and need to be improved, how can we do this? <i>Option 7 – in some other way, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

003; 030; 031; 052; 083. Total of 5 Respondents.

Summary of Comment(s)

1. There needs to be more youth clubs in the District Centres, to stop gangs taking over District Centres. (003)
2. Teenagers should be asked what they want. (003)
3. New centres will be needed to serve major urban extensions. (031)
4. Existing centres need to be regenerated. (031)
5. Vibrant and viable District Centres are essential to provide the day-to-day requirements of their local population. (030)
6. Support independent food retailers using empty property and council tax exemption. (052)
7. Improve policing of Town Centre at night and apply the existing rules and regulations (law) rigidly. (083)

Officers Response to comment(s)

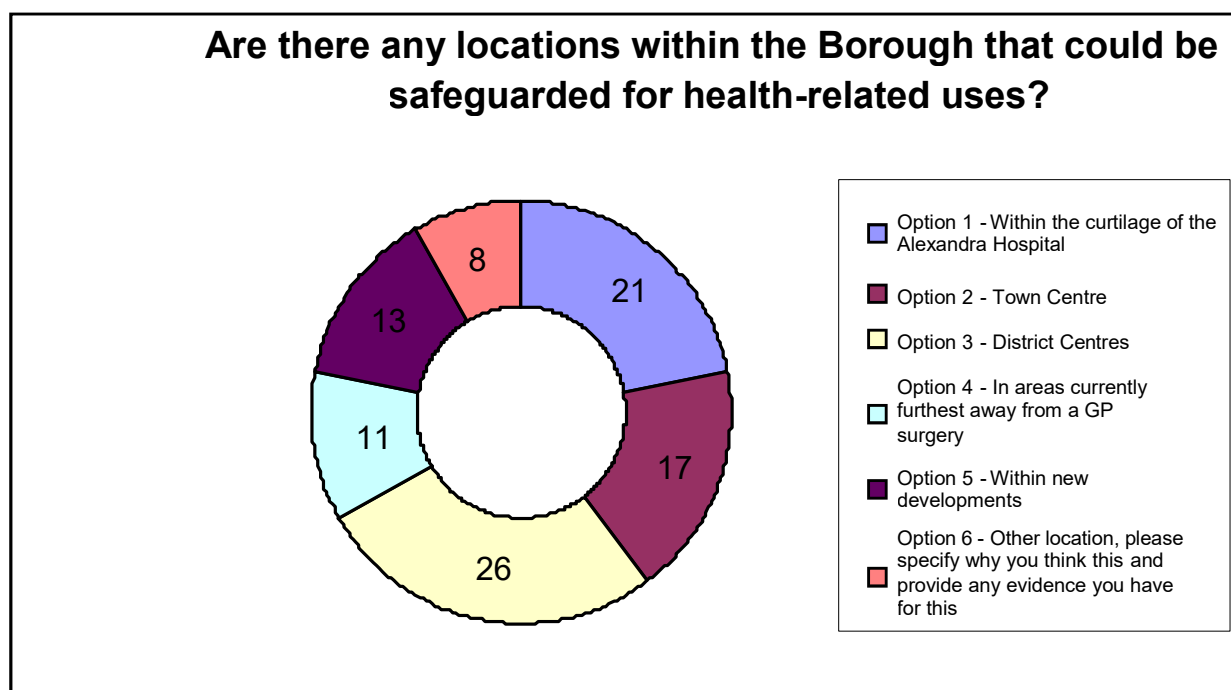
1. There is already a youth club in Church Hill. District centre planning policy would not restrict youth clubs in district centres; however, spatial planning cannot control the establishment of youth clubs.

2. Consultation has been carried out with young people during the preparation of the Core Strategy.
3. It is too early to establish an exact planning policy approach, however the Retail and Leisure Needs Assessment recommends that a new centre may be required.
4. Officers agree.
5. Officers agree.
6. This is not something that spatial planning can achieve but this comment will be passed to the relevant Council department.
7. This is not a spatial planning matter.

Action to be taken with comment
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None

Responses to Question 28



Summary of Representations to Question 28 Option 6

Question No.	28
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Question Title	Are there any locations within the Borough that could be safeguarded for health-related uses? <i>Option 6- other location, please specify why you think this and provide any evidence you have for this.</i>
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URN of Consultees

002; 004; 011; 030; 035; 045; 046; 096. Total of 8 Respondents.

Summary of Comment(s)

1. Big supermarkets. (011)
2. Smallwood Hospital. (035)
3. Car park near three doctor's surgeries (Adelaide Street approx). (035)
4. The Town Centre is the most appropriate location where health-related uses should be situated. (046)
5. The Church Rd area of Redditch Town Centre has a strong health related land use component with Smallwood House and a number of doctor's surgeries, therefore promoting health related uses in this area ensure consistency. (046)
6. At the moment there is a surgery 3 afternoons a week in Feckenham, run by the Astwood Bank practice - safeguard as far as possible. (004)
7. All of these (Options) where appropriate. (002)
8. Health facilities need to be provided to meet the needs of the population in accordance with the requirements of the PCT. (030)
9. The Council should make provision for health facilities together with other community and social infrastructure in accordance with PPS12. (030)
10. One strategic objective refers to safer, sustainable travel patterns and reducing the need

to travel. The sustainable urban extension proposed for Webheath includes provision of a local centre incorporating a doctor's surgery, supported by the primary care trust. We are willing to consider further expansion of local health care facilities on site subject to further discussion and identification of need. We do however consider that the provision of health care on site to be of substantial benefit to existing and future Webheath residents. (045)

11. Support Option 5 that land should be provided within appropriate new developments. Account should be taken of existing provision of health facilities in Redditch, and the needs of new workers and residents. However, account should also be taken of the needs arising from the development of sites in the Borough, and a locational strategy developed for the provision of health facilities. (096)

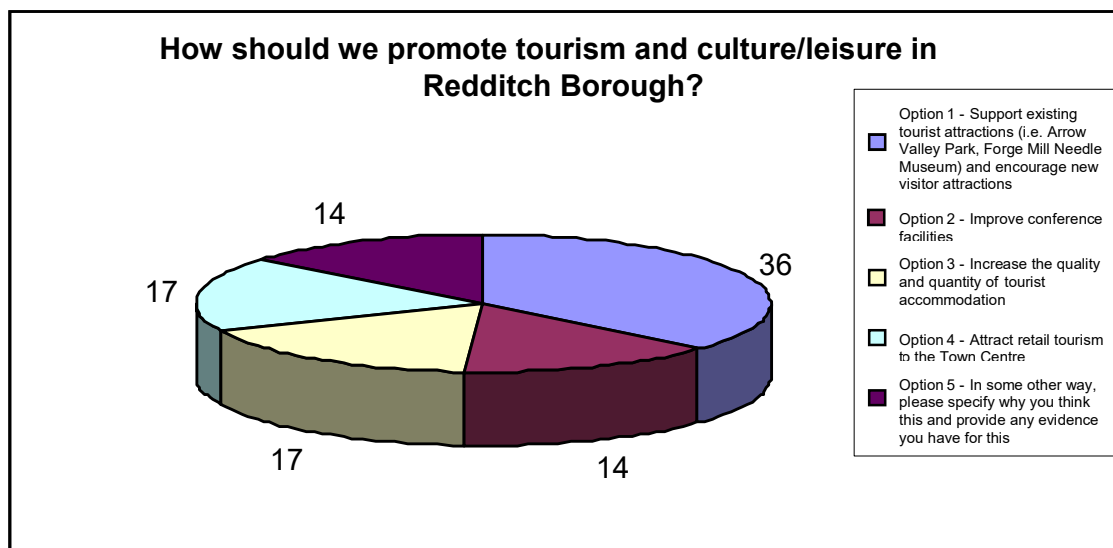
Officers Response to comment(s)

1. It is not considered appropriate for this location to be safeguarded for health-related uses, as planning policy does not preclude supermarkets providing health-related facilities.
2. It is not considered appropriate for this location to be safeguarded for health-related uses, as it would not be desirable to restrict the use of the building to a particular function, especially due to its designation on the list of buildings of local interest.
3. This site forms part of a wider area which is likely to be designated as a strategic site, within which health-related uses would be acceptable; therefore it is not considered appropriate for this location to be safeguarded for health-related uses.
4. It is not considered appropriate for the whole of the Town Centre to be safeguarded for health-related uses; however the principle of health-related uses within the Town Centre is supported from an accessibility perspective.
5. This site forms part of a wider area which is likely to be designated as a strategic site, within which health-related uses would be acceptable; therefore it is not considered appropriate for this location to be safeguarded for health-related uses.
6. It is not viable to safeguard this site for health-related purpose, in terms of securing the ongoing use of this surgery this is not a Core Strategy matter.
7. Officers note the comment
8. Officers note the comment
9. Officers note the comment
10. Officers note the comment
11. Officers note the comment

Action to be taken with comment

None.

Responses to Question 29



Summary of Representations for Question 29 Option 5

Question No.	29	Question Title	How should we promote tourism and culture/ leisure in Redditch Borough? <i>Option 5 – in some other way, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

011; 016; 023; 035; 049; 052; 080; 083; 087; 088; 089; 095; 096; 097. Total of 14 Respondents.

Summary of Comment(s)

1. Promote the open spaces (016)
2. Better quality, unique shops i.e. Leominster is a quality food centre. (011)
3. New proposed project Birmingham Road (*presumed Abbey Stadium*). (035)
4. Recommence 'Dig' at Bordesley Abbey to increase its use as a tourist facility. (023)
5. Increase tourist facilities at Bordesley Abbey and Forge Mill. Encourage educational visits to both from a wide area. (023)
6. Promote the town for tourism for shopping and business opportunities. (023)
7. The Town is in desperate need of better leisure facilities, in particular a leisure pool (the 2 swimming pools at Kingsley College and Hewell Road are pathetic) such as Cocks Moor at Kings Heath and Forest Glades at Kidderminster. (095)
8. There should be an overarching policy to promote and protect existing leisure and cultural facilities, it should also state the loss of an existing facility will be resisted unless it can be demonstrated that the facility is no longer needed or the services provided by the facility can be served in an alternative location. It should also allow for new development of cultural and leisure facilities. (089)
9. Does not consider the regional and sub-regional policy/ strategy. There should be some reference to working with Destination Worcestershire and Conference Worcestershire on the development of tourism and specifically business tourism. (049) (087)
10. Should consider the recently revised Regional Visitor Economy Strategy. (049)
11. Create a Town Centre museum and urban park in addition to Forge Mill. This new urban

- park should be in the Edward Street area. (080)
12. Given that the tourist attractions are of such low quality, tourists have no reason to come here unless they get lost. (052)
 13. Define word 'tourist'. (052)
 14. In all cases an emphasis should be placed upon sustainable tourism, including access to and from attractions. (088)
 15. Consider the creation of better linkages between key attractions and sites, and the development of a new high quality hotel should be supported. (096)
 16. Provide evening bus services again. (097)
 17. Not necessary. (083)

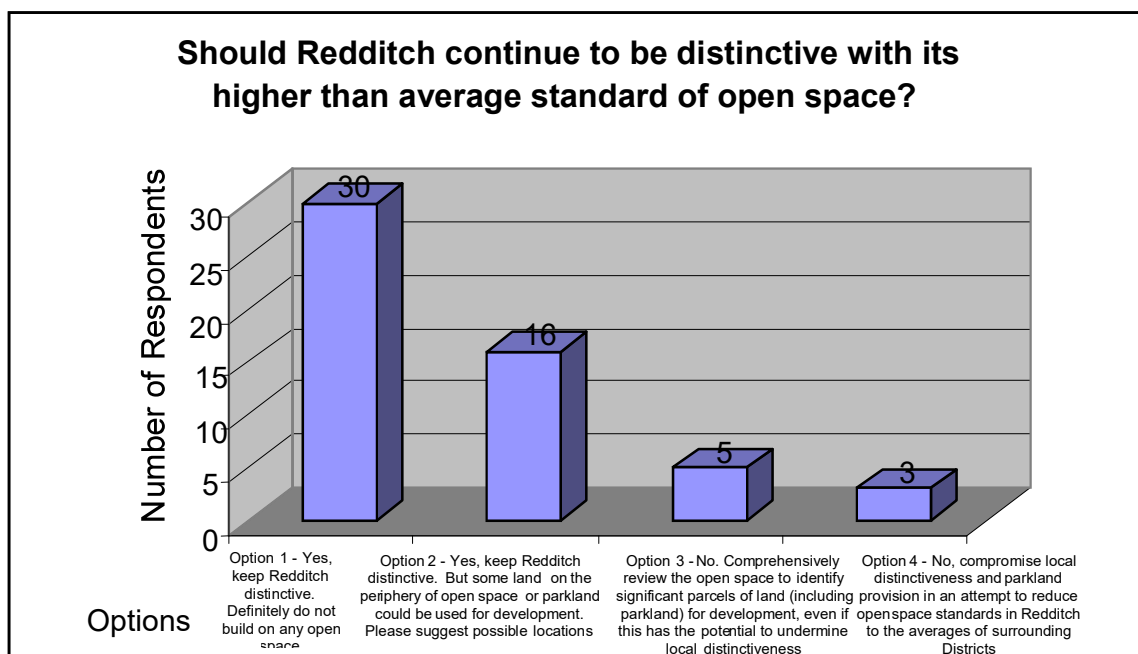
Officers Response to comment(s)

1. Promotion is a marketing function which is not a spatial planning matter.
2. Planning policy can only control the use of buildings, but has little control over the types of retail stores.
3. Officers note the comment
4. Planning policy cannot influence specific activities.
5. This was already presented as an option in the Issues and Options Document.
6. This was already presented as an option in the Issues and Options Document.
7. Officers note the comment
8. Option 1 refers to the protection of existing facilities and promotion of protecting new ones,. With regards to protecting the loss of existing facilities, this is a viable alternative option.
9. Officers note the comment
10. Officers note the comment
11. Edward Street is likely to be a strategic site required for employment purposes.
12. Officers note the comment
13. A definition of 'tourist' should be included in the Glossary.
14. Officers note the comment
15. Creating linkages between key attractions of sites is takes to mean accessibility, which is not something the Core Strategy can achieve. Support for new hotel noted.
16. Although the provision of bus services is not a spatial planning matter, Officers will endeavour to facilitate this.
17. Officers note the comment

Action to be taken with comment

13. Consider inserting a definition of 'tourist' in the glossary.
16. Consider presenting issues regarding future growth to bus operators.

Responses to Question 30



Summary of Representations to Question 30 Option 2

Question No.	Question Title
30	Should Redditch continue to be distinctive with it's higher than average standard of open space? <i>Option 2 – yes, keep Redditch distinctive. But some land on the periphery of open space or parkland could be used for development. Please suggest possible locations.</i>

URN of Consultees

003; 004; 005; 007; 030; 031; 032; 036; 037; 039; 082; 084; 088; 090; 092; 096. Total of 16 Respondents.

Summary of Comment(s)

1. Pitcherwood golf course. (039)
2. 50% Plymouth Rd Golf Club. (036)
3. Option 1 - Yes if it is parkland. (007)
4. Option 2 - depends. (007)
5. The green space of Redditch is distinctive and should very largely be protected. However, a careful review of the Primary Open Space boundary should be undertaken. (031)
6. The question is how much useable public open space we have. In Astwood Bank until the disused allotments are transformed into usable public open space, there is only the small Astwood Bank park. Keep enough open space planted with trees to enhance the environment. (004)
7. Land can be made available for well-planned development to the north west of Redditch. (030)
8. Well planned developments should not compromise the distinctive qualities of Redditch. (030)
9. Developing areas outside the urban area of Redditch will not only help to meet the strategic housing and employment land targets but will also help to maintain the distinctive areas of

open space within the urban area. Land to the north of Redditch is a sustainable location for residential development, development that would not encroach on any of the important areas of open space. It would allow for incorporation of further open space and green infrastructure within the development design. (005)

10. This section is written in a loaded fashion e.g. reference to high level of open space being a "legacy to the people of Redditch". The options are also loaded. Is there any robust assessment of open space, does it perform a strategic function when compared to say the strategic function of the Green Belt. What is the quality of the open space? How well is it used etc? (092)

11. Continue to promote and protect its high levels of open space for a range of public and environmental benefits. SSSIs, SWSs and Biodiversity Action Plan priority habitats must be protected and enhanced but there may be some opportunities for developing poor quality open space where this offers the most sustainable solution to development requirements. Development of existing open space should only be carried out after considerable scrutiny of alternatives and in light of a wider Green Infrastructure Strategy. Opportunities to offset losses in the open space portfolio, either through provision of new areas or through improvements on existing sites, must be a fundamental consideration in determining whether development should be permitted on existing open spaces. (090)

12. Statutory and non-statutory protected sites must be protected. High quality open space should also be preserved. However, if it is shown to be the most sustainable option the development of low quality open space in such a way as to secure positive environmental gain should not be ruled out. Sites would have to be considered on an individual basis but within the overall setting of a wider spatial consideration of Green Infrastructure. (088)

13. Open space provision will need to be based upon the mix of uses ultimately developed in the Borough, but account should also be taken of the availability of existing open spaces in the surrounding area. (096)

14. This will come through a PPG17 audit.

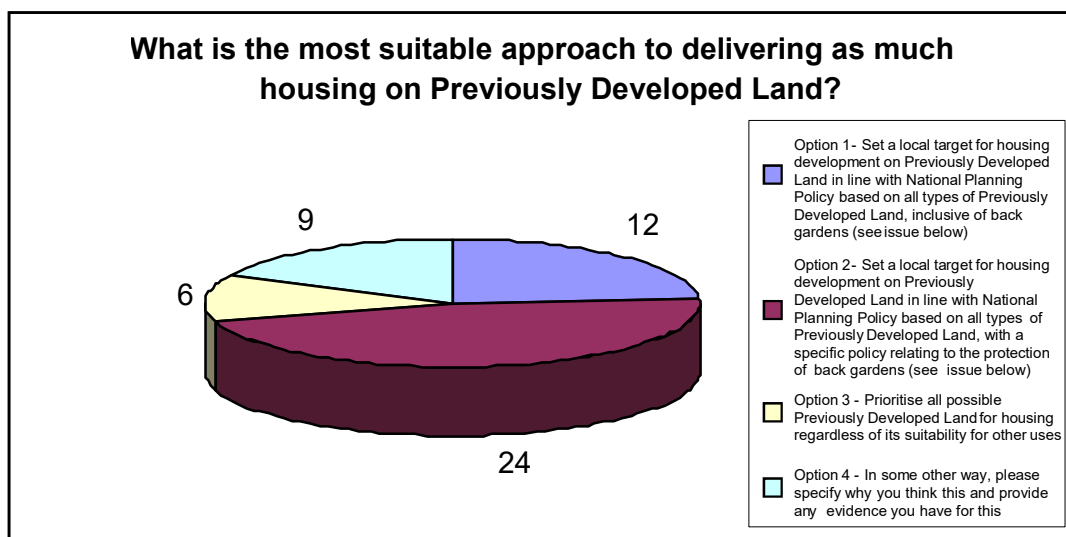
Officers Response to comment(s)

1. The viability of using this site will be explored.
2. The viability of using this site will be explored.
3. Officers note the comment
4. Officers note the comment
5. Officers note the comment
6. This is not suggesting a possible site.
7. This is not specific enough.
8. Officers note the comment
9. This is not within the administrative boundaries of Redditch Borough and therefore cannot be included within the Core Strategy.
10. An open space needs assessment refresh and Green Belt study will inform the evidence base of the Core Strategy.
11. Officers consider this to be a viable approach.
12. Officers consider this to be a viable approach.
13. Officers note the comment
14. Officers note the comment

Action to be taken with comment

None.

Responses to Question 31



Summary of Representations to Question 31 Option 4

Question No.	31
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Question Title	What is the most suitable approach to delivering as much housing on Previously Developed Land? <i>Option 4 – in some other way, please specify why you think this and provide any evidence you have for this.</i>
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URN of Consultees

003; 021; 030; 042; 045; 080; 093. Total of 9 Respondents.

Summary of Comment(s)

1. As manufacturing declines, utilise land where possible, for example land opposite Mettis. (003)
2. Use Brownfield land where possible reducing the chance of Green Belt being used. (003)
3. Set a local target based on a character assessment of the Borough. (042)
4. [Answer applies to Q.32 as well] Redditch cannot achieve national policy requirements for development on PDL as it has insufficient Brownfield land. A local policy is needed demonstrating why there are exceptional circumstances which would necessitate a departure from national policy. (030)
5. There should be flexibility in the management and release of land prioritising re-use of PDL such that there is recognition of the role of greenfield releases. Refer to para 13 of PPS3 advising that LA's should retain a supply that is available, suitable and viable. (045)
6. The priority for the re-use of PDL should not preclude development of greenfield sites in sustainable locations satisfying the objectives of the core strategy. Greenfield sites may be sited in more sustainable locations than some brownfield sites and any future policy should reflect this e.g. Webheath, which should be allocated for development. (045)
7. Use previously developed land. No back gardens. Back gardens should not be considered Brownfield sites. (080)
8. SFRA should be utilised in undertaking the sequential test for allocating housing on PDL. Disagree with options 3 as some sites at flood risk may be more suitable to a 'less vulnerable use' i.e. commercial use (depending on extent of flood risk and informed by the SFRA, sequential test). (093)

9. 60% target in the WMRSS is only an average. Local Authorities should seek to contribute to the regional minimum target of 70%. This allows Redditch to set a local target as per Options 1 and 2. However whilst Option 3 would also be expected to maximise the re-use of land and building for housing, the Brownfield sites must be in sustainable locations to accord with Policy CF5 and paragraph 6.37 of the RSS Preferred Option. Option 3 would likely fall foul of the RSS approach to employment land provision, in respect of protecting the most important and versatile employment sites from development for housing.

10. Back gardens should not be considered Brownfield sites.

Officers Response to comment(s)

1. The Employment Land Review will consider the likelihood of employment sites to be utilised for other forms of development.

2. This is the purpose of PDL.

3. It is considered that Redditch is not large enough to warrant an urban character study

4. Officers accept that there is limited brownfield potential and it is likely that a local policy will consider a lower requirement with a justification but will contribute towards maximising the re-use of land and buildings as far as practicable.

5. Officers note the comment

6. It is envisaged that in order for the Brownfield sites to be delivered as a priority, a 5-year land supply or supporting phasing policy may be appropriate for the Core Strategy and the proposed Sustainable Urban Extensions is likely to be a viable option for development after more sustainable urban Brownfield sites have been implemented. The alternative approaches for the parcel of land at the Webheath ADR will be presented in the Preferred Draft Core Strategy.

7. National Planning Policy advises that back gardens continue to be considered as a Brownfield site.

8. Officers note the comment

9. Officers agree that a local previously developed land target can be justified but will contribute towards maximising the re-use of land and buildings as far as practicable.

10. The definition of Brownfield land continues to recognise back gardens as Brownfield land by National Government, therefore Redditch Borough Council will continue to regard back gardens as Brownfield.

Action to be taken with comment

None.

Summary of Representations to Question 32

Question No.	32	Question Title	Do you have any comments on the Previously Developed Land target for Redditch?
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URN of Consultees

002; 004; 005; 007; 010; 017; 028; 031; 033; 035; 038; 041; 042; 049; 084; 090; 096; 097.
Total of 18 Respondents.

Summary of Comment(s)

1. Redditch Borough Council exceeded 25% target, this should be more in the region of 60-75%. (017)
2. 'Back garden development' and infill is good to provide extra housing, while protecting green land. (010)
3. The first part of this section sets out the housing proposals which should be set out as part of the overall context. (028)
4. The extent of PDL in the Borough in relation to RSS targets should be brought out in terms of the local distinctiveness of the area. A target should be based on evidence setting out the extent of PDL and the expectation of bringing it forward. (028)
5. Town is large enough now due to previous development. Further development should be discouraged. (035)
6. This target is considered to be optimistic given the nature of Redditch; a more flexible approach is required based on a local character assessment. (042)
7. Increase in housing results in more cars on the road, average of 2 per household - more schools/nurseries etc. Doctor's surgeries/District Nurses more District Centres - but what about employment? (007)
8. Must be in New Town areas. (038)
9. Development should be focused on Brownfield sites. (033)
10. The 60% target cannot be achieved, as Redditch does not have sufficient Brownfield land. The WMRSS does not take this into account; therefore the housing target for Redditch should be reduced so that housing development within the Borough achieves this figure, with the remaining requirement being accommodated with adjacent boroughs. (084)
11. Where possible, development should take place on previously developed land, however some development will have to take place on ADR and Green Belt within Redditch Borough. The current target of 25% is considered realistic as a proportion of 3,300 dwellings. (031)
12. 25% sounds much more practical and positive than 60%. (004)
13. It's good to see that land at the rail station is being used efficiently. (002)
14. The sequential approach applied under PPG3 has been removed and it is accepted in PPS3 that key considerations relate to the creation of mixed and sustainable communities and ensure an adequate supply of developable land. Concern that brownfield land may not always be the most sustainable locations or would deliver the required housing trajectory. Therefore the sustainable location and deliverability of future development sites should be considered just as highly as whether development is located on PDL. Support Option 1 or 2. It is important that targets are based on robust and credible local evidence. (005)
15. Strongly oppose option 3 (Question 31) as it may result in unsuitable and unsustainable development being permitted simply because of its location on PDL. (005)
16. It is vital that any policy in this area reflects the considerable ecological value often found in back gardens and other previously developed land. Such sites can be critical components in local ecological networks and can be extremely important links in wider 'green' corridors. (090)
17. Support the focus on developing previously developed land and encourage the use of targets to provide this. (096)
18. No point in having development in high cost locations – western areas, when this reduces capabilities for cheap development elsewhere – Arrow Valley, Bordesley and Studley. (041)

- 19. In favour of using Previously Developed Land but not on swathes of back garden land, now with densities where properties are less than 1m apart with virtually no garden. (097)
- 20. Include local previously developed land target and trajectory, taking account of monitoring undertaken by the RPB.
- 21. Make provision for temporary storage and possibly remediation, of any contaminated land which is identified and that provisions will be imposed requiring clarification of where any such material is removed. (049)

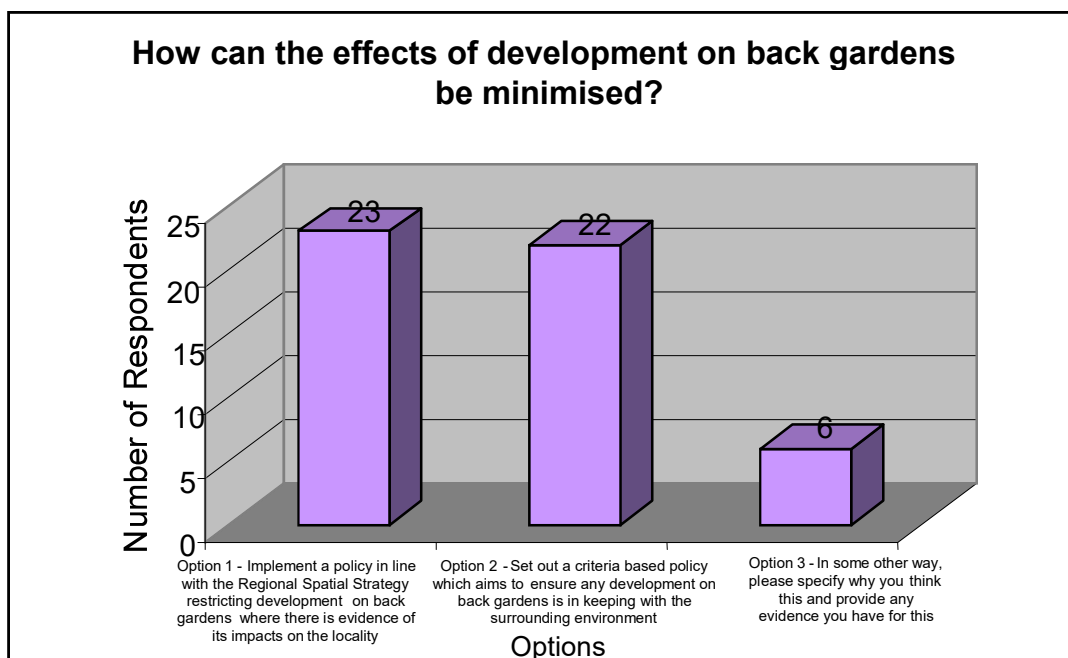
Officers Response to comment(s)

- 1. It is not considered that Redditch Borough is able to meet the 60% RSS requirement for development on PDL, therefore a local policy approach is likely to justify a lower percentage requirement.
- 2. This is noted as a good approach but does not comment on the PDL target.
- 3. Officers note the comment
- 4. It is not considered that Redditch Borough is able to meet the 60% RSS requirement for development on PDL, therefore a local policy approach is likely to justify a lower percentage requirement.
- 5. Future development requirements to meet need are set out in the Regional Spatial Strategy Phase Two Preferred Options Document.
- 6. It is not considered that Redditch Borough is able to meet the 60% RSS requirement for development on PDL, therefore a local policy approach is likely to justify a lower percentage requirement.
- 7. This response does not relate to the question. However the Regional Spatial Strategy Phase Two Preferred Options Document sets an employment requirement for Redditch Borough.
- 8. If it is suggested that development on PDL should be restricted to New Town areas only this is not considered viable because there may be sustainable PDL elsewhere in the Borough.
- 9. Officers note the comment
- 10. It is not considered that Redditch Borough is able to meet the 60% RSS requirement for development on PDL; therefore a local policy approach is likely to justify a lower percentage requirement. Irrespective of the PDL target, the Regional Spatial Strategy Phase Two Preferred Options Document sets a housing requirement for the Borough based on meeting its needs.
- 11. Officers note the comment
- 12. Officers note the comment
- 13. Officers note the comment
- 14. It is envisaged that in order for the brownfield sites to be delivered as a priority, a 5-year land supply or supporting phasing policy may be appropriate for the core strategy and the proposed Sustainable Urban Extensions is likely to be a viable option for development after more sustainable urban brownfield sites have been implemented.
- 15. It is envisaged that in order for the brownfield sites to be delivered as a priority, a 5-year land supply or supporting phasing policy may be appropriate for the core strategy and the proposed Sustainable Urban Extensions is likely to be a viable option for development after more sustainable urban brownfield sites have been implemented.
- 16. This is noted as a good approach but does not comment on the PDL target.
- 17. Officers note the comment
- 18. This response does not relate to the question.
- 19. Officers note the comment
- 20. Officers note the comment
- 21. Although this may be an acceptable approach, it does not relate to the question.

Action to be taken with comment

None

Responses to Question 33



Summary of Representations to Question 33 Option 3

Question No.	Question Title
33	How can the effects of development on back gardens be minimised? <i>Option 3 – in some other way, please specify why you think this and provide any evidence you have for this.</i>

URN of Consultees

003; 021; 049; 080; 097. Total of 6 Respondents.

Summary of Comment(s)

1. Leave them alone. Do not use any back gardens. (003) (080)
2. It is not clear if this is an issue in its own right or related to Previously Developed Land.
3. Don't allow the type of development that knocks 1 house down (say 2 vehicle movements) but then allows 40 properties (generating 80 vehicles) to be built in backland; the existing roads are not capable of carrying this type of development. (097)
4. RSS paragraph 6.36 allows LDDs to consider special policy protection in relation to gardens. However in regard to Option 1, the RSS at paragraph 6.36 does not say that development on back gardens should be restricted where there is evidence of its impacts on the locality as suggested in the option. (021)
5. Options can be combined, suggest 'restrict development on back gardens where there is evidence of its impacts on the locality, for other developments criteria based policy will ensure that any development in back gardens is in keeping with the surrounding environment.' The development of a green infrastructure strategy could address the role that gardens play in the character of the area. (049)

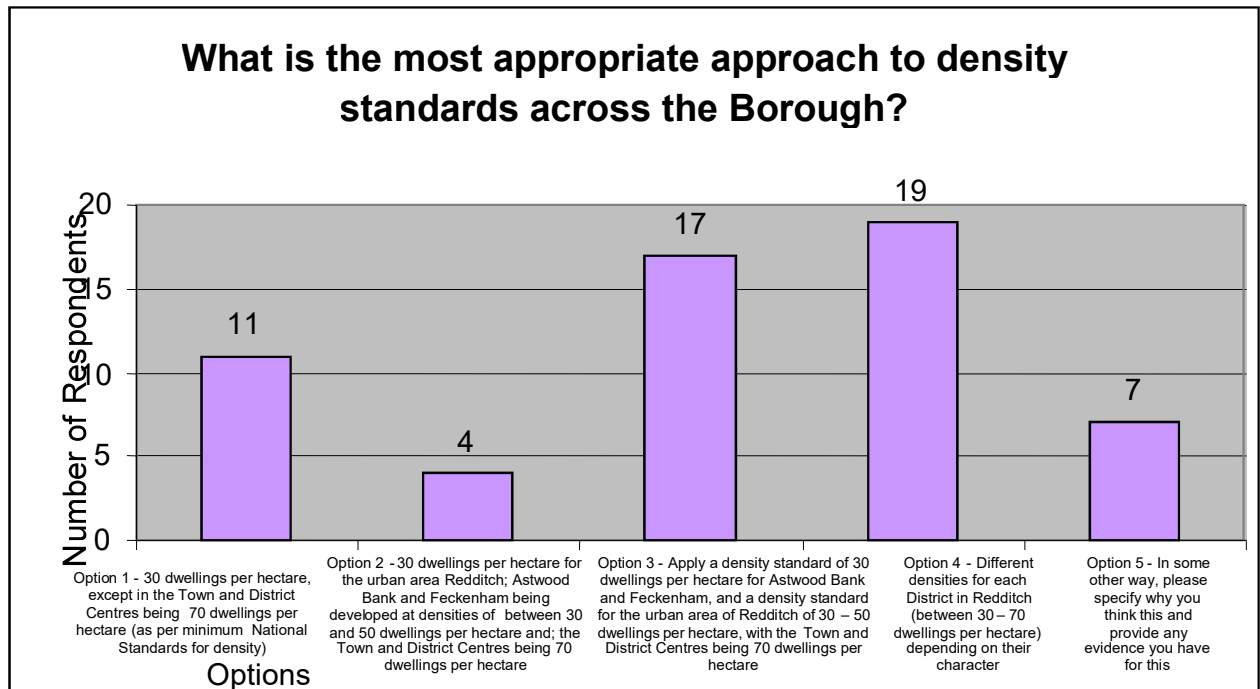
Officers Response to comment(s)

1. This could be a viable option.
2. Noted.
3. Noted
4. Officers accept that the intentions of Option 1 would not be viable.
5. Officers agree that this is a viable approach but does not suggest an alternative option.

Action to be taken with comment

None.

Responses to Question 34



Summary of Representations to Question 34 Option 5

Question No.	Question Title
34	What is the most appropriate approach to density standards across the Borough? Option 5 - <i>in some other way, please specify why you think this and provide any evidence you have for this</i>

URN of Consultees

003; 035; 042; 045; 080; 090; 092; 096. Total of 7 Respondents.

Summary of Comment(s)

1. People need space and should not be cooped up. (003)
2. No more dwellings at all. Save the green belt. (035)
3. Undertake a local character assessment and adopt a local policy. (042)
4. Not appropriate to apply blanket density, instead approach on a site by site basis. PPS3 provides sufficient flexibility to allow a range of densities in different areas (para 30) (045)
5. No mention of PPS3 housing with regards to housing density under this heading in either

Issues and Options document or the context document. (092)

6. No more than 30 dwellings per hectare across the whole Borough. (080)

7. Support Option 3 provided that it includes a caveat concerning respecting environmental limits and up-to-date ecological information. In addition density standards should be informed by the need for good Green Infrastructure provision and high quality design, both of which can help to ensure genuinely sustainable development. (090)

8. Consider that the options set out under this issue are too prescriptive in their reference to particular density levels. Whilst PPS3 paragraph 47 acknowledges that local planning authorities may wish to set out a range of densities across a plan area, there are other factors that ultimately will be taken into account in determining the appropriate density on an individual site. There are likely to be parts of Redditch where it is entirely appropriate to achieve the higher density levels. Option 1 proposes that there should be a density of 30 dph in the Borough and 70 dph in Town and District Centres. Provided that this option does not imply a limit on the maximum density that can be achieved, it is one that could be supported. (096)

Officers Response to comment(s)

1. Noted

2. Future development requirements to meet need are set out in the Regional Spatial Strategy Phase Two Preferred Options Document.

3. This is the same as option 4.

4. Officers consider this to be a viable option.

5. Noted

6. Officers consider this to be a viable option.

7. Officers agree this could be a viable approach but does not present an alternative option.

8. Officers agree this could be a viable approach but does not present an alternative option.

Action to be taken with comment

None.

Summary of Representations to Question 35

Question No.	35	Question Title	What is the most appropriate approach for phasing new development in Redditch Borough?
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URN of Consultees

002; 003; 004; 007; 008; 009; 010; 011; 016; 017; 021; 023; 024; 027; 028; 030; 031; 033; 035; 036; 041; 042; 045; 049; 050; 052; 080; 081; 083; 084; 088; 090; 093; 094; 096; 097. Total of 36 Respondents.

Summary of Comment(s)

1. It must be a balanced approach between economic value and the value of quality of life. (016)
2. Previously developed land – conversions of all types of property – Change of use and renovations. (017)
3. Brownfield land first, then villages and Hamlets, followed by Feckenham and Astwood Bank where facilities and services are already present. (010)
4. Focus development near railway station, and then areas will be served by public transport. (011)
5. Gradual. (003)
6. This is a key element in the implementation of the Core Strategy and should be dealt with in the Implementation section. It should be linked to the provision of infrastructure and the programmes of stakeholders who are providing services. (028)
7. Greenfield development should only be considered where the locations are accessible by means other than the private car. When assessing locations for new development, the aim should be to reduce the need to travel. (027)
8. Housing depends on employment growth. (008)
9. Consider new business park encouraging higher earners. (008)
10. Town Centre first, followed by Brownfield sites. (024) (036)
11. Ensure there is sufficient money to do it and ask people what they want before you do it. (035)
12. New development/housing need facilities - bus routes/shops/walkways/play areas etc. If businesses, they need to park cars, or utilise bus routes, and require places to eat etc. (007)
13. Phasing should concentrate on the early release of readily deliverable sites - i.e. those not subject to significant ownership or with major redevelopment implications. Release of land for housing should also not be restricted by requirements related to the completion of infrastructure provision. (042)
14. Slowly, carefully and restrained. Resist 'bullying' by central government. (033)
15. Careful planning. (023) (009) (050)
16. Phasing related to infrastructure provision is appropriate. (030) (031) (097)

17. Opportunities in the Town Centre should be taken first. (004)
18. Apart from windfall sites, new development should take advantage of existing infrastructure as far as possible. Any new development e.g. on ADR land must have infrastructure in place before development. (004)
19. Small numbers don't like large estates. (002)
20. Strategic sites must be brought forward in a manner which ensures sites are viable and deliver the infrastructure economically and in a timely way (para 4.7 and 4.9 PPS1). (030)
21. Phasing strategies for strategic sites must be discussed with developers prior to publication of Core Strategy to ensure phasing is sound. (030)
22. In order of priority: 1. Town Centre, 2. Brownfield sites within the urban area, 3. Greenfield sites and open areas within the urban area, 4. Sustainable ADR. (096)
23. Regeneration of previously developed area of land only. (083) (084)
24. In accordance with the requirements of PPS3, identify broad locations and specific sites for development for at least 15 years from the proposed date of adoption with sufficient specific deliverable sites to deliver housing in the first five years. Beyond this supply of specific deliverable sites should be identified for years 6 - 10 and preferably also for years 11 - 15. Manage release of sites to ensure continuous 5 year supply of housing land. Therefore no need for implementation of formal phasing policy. (045)
25. Concern about the practical implementation of having infrastructure in place before significant areas are developed. Much new infrastructure is funded by development proposals and it's impractical to expect developers to spend significant sums prior to receiving receipts from a site. The approach to the delivery of infrastructure related to new development should be considered on a site by site basis and an appropriate delivery mechanism agreed between all relevant parties. (045)
26. VERY, VERY, very slowly. (080)
27. Phasing should be in line with ability to deliver. (052)
28. For the phasing of new sites bring forward sites at lowest flood risk first, informed by SFRA on flood risk grounds and where infrastructure provision is available or could be provided. (093)
29. The term 'best locations' could be further defined in terms of locations that are 'most accessible' and/or reduce the requirement to travel. (094)
30. Infrastructure existing or easy/cheaper/less disturbance to provide before developing (081)
31. Consult local residents at planning stage. (081)
32. Suggest that Green Infrastructure requirements, together with issues of sustainable drainage and biodiversity enhancement must be considered early in the allocations process. Sites where these issues are well worked up could perhaps come forward as the most sustainable options in advance of other areas. (090)
33. In setting up of infrastructure before developing an area should also include green infrastructure, such as open space, SuDS etc, and renewable energy technologies. (088)
34. It is important to lay foundations for drainage low down in seven catchments to Sernal. Sewers must be programmed usefully and appropriately for development to trigger railway station. (041)
35. The most convenient approach for Children's Services would be to develop smaller sites within the town before any large major developments. This approach would allow us to clearly see what spare capacity exists in local schools after the in-fill development and then plan any additional provision required for the major sites. However we appreciate that this approach would not suit all other parties. (049)
36. Where new schools are required to serve major developments, it is important that their construction is planned to coincide with the uplift in pupil numbers resulting from the development. This should allow appropriate timescales for consultation and the statutory processes required to establish a new school. (049)
37. Core Strategy should generally accord with Policy CF10 Managing housing land supply. (028)

Officers Response to comment(s)

1. This is a consideration of the Sustainability Appraisal.
2. It is assumed that these are what the consultee wants to be phased in first. This is considered to be a viable option.
3. This is a consideration for the settlement hierarchy rather than phasing of sites.
4. The railway station is within the Town Centre which is likely to be a focus for appropriate development.
5. Officers note the comment
6. Officers note the comment
7. Officers note the comment
8. Officers note the comment
9. This is not a relevant response to question.
10. The Town Centre is likely to be a focus for appropriate development.
11. Officers note the comment
12. It is considered that infrastructure needs to be in place or have a prospect of being implemented to support new development, the WMRSS Para 6.24 states that "This infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development".14.
13. Officers agree that phasing should concentrate on the early release of readily deliverable sites however infrastructure needs to be in place or have a prospect of being implemented to support new development, the WMRSS Para 6.24 states that "This infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development".
14. Officers note the comment
15. Officers note the comment
16. It is considered that infrastructure needs to be in place or have a prospect of being implemented to support new development, the WMRSS Para 6.24 states that "This infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development".14.
17. The Town Centre is likely to be a focus for appropriate development.
18. Officers note the comment
19. This is not a relevant response to question.
20. Officers note the comment
- 21 Officers note the comment
22. This is a similar approach to that set out in the Development Strategy which has been assessed in the Sustainability Appraisal.
23. Officers note the comment
24. Not having a policy on phasing is considered a viable option.
25. It is considered that infrastructure needs to be in place or have a prospect of being implemented to support new development, the WMRSS Para 6.24 states that "This infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development".14.
26. This is not a relevant response to question.
27. Officers note the comment
28. This could inform the approach of a likely flooding policy but does not suggest an option for this question.
29. The best locations are not only those that are the most accessible. Any future reference to 'best locations' would be defined if appropriate.
30. It is considered that infrastructure needs to be in place or have a prospect of being implemented to support new development, the WMRSS Para 6.24 states that "This infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development".14.
31. Officers note the comment
32. It would not be feasible to have all of this information available to inform the phasing of sites.

- 33. These are implemented as part of development.
- 34. Officers note the comment
- 35. It is likely that as a result of an appropriate phasing policy that smaller sites in the urban area will be implemented before any large scale developments.
- 36. The impact of any future development on schools will continue to be assessed in consultation with Worcestershire County Council/LEA.
- 37. Officers note the comment

Action to be taken with comment

29. Consider defining 'best locations' if this term is to be used in the Preferred Core Strategy, either in the glossary or Core Strategy.

Summary of Representations to Question 36

Question No.	36	Question Title	Do you think trees are an important part of Redditch's distinctiveness which needs to be maintained and encouraged as a feature of Redditch for the future?

URN of Consultees

001; 002; 003; 004; 007; 008; 009; 010; 011; 012; 013; 015; 016; 017; 018; 019; 023; 024; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 049; 050; 051; 052; 080; 081; 083; 084; 088; 090; 095; 096; 097. Total of 43 Respondents.

Summary of Comment(s)

1. Yes, but within reason. (015) (081)
2. Yes, especially old and native trees, whereas others around the town are of limited value. (016)
3. Yes. (001) (003) (004) (012) (017) (018) (019) (023) (024) (032) (034) (035) (036) (037) (039) (041) (049) (095) (097) (033)
4. Should be maintained in good condition, hedges and trees should be trimmed, conditions at present are diabolical. (036)
5. Proud of greenery. The trees, parks lake and ponds - nature reserve. Some trees too tall next to a lot of houses and could do with topping or trimming but not cut down. (007)
6. Trees add character, distinctiveness and environmental value throughout all forms of development and should be retained and provided in new development where possible. (042)
7. Yes, we need more green areas and parks. Plant more trees. (038) (080)
8. Yes, trees are important. Some conflict in reasons for removing trees/shrubs i.e. to reduce fear of crime/assist CCTV. Communities should be involved in this decision making e.g. local tree guardians. (040)
9. Definitely. (009) (095)
10. Very important - they clean the air and pump up water. (002) (050) (010)
11. Trees are an important part of every town but no more in Redditch than anywhere else. (084)
12. Yes. Trees are an extremely important part of Redditch's distinctiveness and future. They are worth preserving for their worth in bringing in visitors/tourists to view their beauty alone. They must be maintained and encouraged as a top feature of Redditch. The original planning of the New Town with its careful planning of trees is a tribute to the planners' vision and improves, year on year, as a sight to see. (083)
13. Yes, do not destroy existing for building plots. (051)
14. Nice but not necessarily important. (052)
15. Yes. Trees are an extremely valuable component of the Borough and provide significant biodiversity and environmental benefit as well as enhancing the visual appeal of the area and helping to combat the effects of climate change. (013) (090)

16. Yes. It should also be remembered that trees are a valuable asset to biodiversity, and that street trees or trees in back gardens play a valuable role in the wider Green Infrastructure. (088)
17. The protection of trees should be assessed on a site by site basis but should not constrain the economic development of the Borough. (096)
18. Yes, very important. (008) (010) (011)

Officers Response to comment(s)

1. Officers note the comment.
2. Officers note the comment
3. Officers note the comment
4. Maintenance of trees and hedges is not a spatial planning matter.
5. Maintenance of trees and hedges is not a spatial planning matter.
6. Officers note the comment
7. Officers note the comment
8. Officers note the comment
9. Officers note the comment
10. Officers note the comment
11. Officers note the comment
12. Officers note the comment
13. Officers note the comment
14. Officers note the comment
15. Officers note the comment
16. Officers note the comment
17. Officers note the comment
18. Officers note the comment

Action to be taken with comment

None.

Summary of Representations to Question 37

Question No.	37	Question Title	Do you think that self-contained districts should be promoted as a distinctive feature of Redditch for the future?

URN of Consultees

001; 002; 003; 004; 007; 008; 009; 010; 011; 012; 016; 017; 023; 024; 032; 033; 035; 036; 037; 038; 039; 040; 041; 042; 049; 050; 051; 052; 080; 081; 082; 083; 084; 088; 095; 096; 097.
Total of 37 Respondents.

Summary of Comment(s)

1. Yes. (001) (008) (010) (011) (012) (016) (023) (024) (032) (033) (037) (049) (039) (051) (082) (097)
2. No. (050) (036) (035) (007) (038) (052) (017) (083) (095)
3. No, this will pit one estate against another. (003)
4. No - there is life out there. (007)
5. It is considered unlikely that self-sustaining self contained districts are a realistic and achievable objective given the form, scale and nature of the Redditch borough and the scale of development currently proposed. (042)
6. Possibly - there is benefit in having a local identity. Helps community cohesion and may add value to community renewable projects, decision making and tenant management systems. (040)
7. No, not if they are inward looking as with the New Town District Centres. They won't be entirely self-contained as people will travel out of them for work. Centres with good facilities could promote active neighbourhoods. (004)
8. Yes, if possible. (009)
9. Yes as long as there is good public transport between them and the main centre. (002)
10. Absolutely not. Redditch should remain as one large community. (084)
11. Yes. But do not allow them to grow and grow, keep them at their present sizes. (080)
12. Sounds good idea but worried about 'ghetto' attitude. (081)
13. Theoretically, yes. Self-contained districts with a full range of services including available employment would seem to support sustainability by reducing the need to travel and supporting the local economy. However, self-contained districts would need to fit in to the Borough as a whole, and support the Strategic Vision. (088)
14. Agree that self contained districts should be reviewed and promoted as sustainable communities in Redditch. (096)
15. Housing within Arrow Valley ideally, and establish social housing by RSLs. (041)

Officers Response to comment(s)

1. Officers note the comment
2. Officers note the comment
3. Officers note the comment
4. Officers note the comment
5. Officers note the comment
6. Officers note the comment
7. Officers note the comment
8. Officers note the comment
9. Officers note the comment
10. Officers note the comment
11. Officers note the comment
12. Officers note the comment
13. Officers note the comment
14. Officers note the comment
15. This is not related to the question.

Action to be taken with comment

None.

Summary of Representations to Question 38

Question No.	38	Question Title	Do you think that Redditch's road hierarchy should be maintained as a distinctive feature of Redditch for the future?
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URN of Consultees

001; 002; 003; 004; 007; 008; 009; 010; 011; 012; 017; 019; 021; 023; 024; 027; 032; 033; 035; 036; 037; 038; 039; 040; 041; 042; 049; 050; 051; 052; 080; 081; 082; 083; 084; 094; 095; 096; 097. Total of 39 Respondents.

Summary of Comment(s)

1. Yes. (001) (003) (008) (010) (011) (012) (017) (019) (023) (024) (027) (032) (033) (036) (037) (038) (039) (041) (042) (050) (082) (083) (084)
2. Stick with the good old. Improve with the new. (035)
3. Some road markings got out of hand but seem sorted now. (007)
4. Hierarchy for transport should be 1 – pedestrians, 2 - mobility impaired, 3 – cyclists, 4 - public transport users, 5 - powered 2-wheelers, 6 - commercial users, 7 - shoppers/visitors by car, 8 - car commuters. (040)
5. The road hierarchy in the newer parts of the town is good for traffic movement, but provide pavements for pedestrians where they need them regardless of the road hierarchy. Separate cycle lanes would be a good idea where there is space. (004)
6. Redditch roads are a disgrace, as is the stream and river bed - both or all need maintenance. (009)
7. We want the Bordesley Bypass. It will fit well into the road hierarchy. (002)
8. Yes and increased. (051)
9. No. (052) (080) (095)
10. Current road hierarchy provides absolute priority to the car on core arterial routes. Enhance the network of sustainable transport corridors (which are for the exclusive use of passenger transport, bicycles and pedestrians) to be sustainable, self-sufficient and consistent with the RSS. Existing road network facilitates out-migration to the west midlands conurbation, which discourages self-sufficiency and thus the sustainability of Redditch as a settlement. (049) (094)
11. Yes with improvements to older/rural areas where possible. (081)
12. Redditch's road hierarchy should be reviewed as part of a local transport plan/strategy. (096)
13. Yes but the New Town planned roads to the east and south of the Borough should be completed as originally intended, such as the A435 Studley bypass urgently. Otherwise the more the town develops, the quicker total seizure will occur in these areas, being completely counter productive. (097)
14. Changes to the road hierarchy on local distinctiveness grounds could impact on highways and transportation considerations and that account should be taken of RSS chapter 9 Transport and Accessibility in particular Policy T9. (021)

Officers Response to comment(s)

1. Officers note the comment
2. Officers note the comment
3. This is not a relevant response for this question.
4. This is not the intention of a road hierarchy. The road hierarchy is meant to reflect types of roads.
5. Officers note the comment
6. Maintenance is not a spatial planning matter.

7. Officers note the comment
8. Officers note the comment
9. Officers note the comment
10. Redditch is considered a sustainable settlement irrespective of its road hierarchy.
11. Officers note the comment
12. Officers note the comment
13. It is considered that infrastructure needs to be in place or have a prospect of being implemented to support new development, the WMRSS Para 6.24 states that "This infrastructure needs to be provided, as far as possible, at the same time as the housing development, as a necessary prerequisite of development".
14. Officers note the comment

Action to be taken with comment

None

Summary of Representations to Question 39

Question No.	Question Title
39	Do you think that the separation of roads and footpaths should be maintained as a distinctive feature of Redditch for the future?

URN of Consultees

001; 002; 003; 004; 006; 007; 008; 009; 010; 011; 012; 015; 016; 017; 018; 019; 023; 024; 032; 033; 034; 035; 036; 037; 038; 039; 040; 041; 042; 045; 049; 051; 052; 080; 081; 082; 083; 084; 088; 090; 095; 096; 097. Total of 43 Respondents.

Summary of Comment(s)

1. No. (015) (039) (080)
2. Yes. (006) (008) (012) (016) (017) (018) (023) (024) (034) (035) (036) (037) (042) (049) (051) (082) (083) (084) (095)
3. Not in total, footpaths along road edge are the best situation also road bridges are safe. (019) (010)
4. Footpaths and cycle routes need to be direct. (011) (052)
5. There needs to be more footpaths. (003)
6. Not keen on subways - could do with more footpaths along highways - sometimes need to walk as no buses on certain roads. (007)
7. Yes, as it is too hard to cross the roads. (038)
8. Not necessarily. (032)
9. Provide quality walkways, including to and from schools. (040)
10. Slowing traffic with 20mph zones/home zones. (040)
11. Not necessarily, as they are not always safe or practical. (033)
12. Not when it puts pedestrians at a disadvantage. (004)
13. They are already established and I can't see how you can alter the status quo. (009)
14. Only if footpaths can be better maintained, signposted and mapped so that they are better used. (001)
15. Yes, but people do not feel safe in the underpasses. (002)
16. Do not consider that this level of detail is appropriate for inclusion in the Core Strategy. More appropriate for a development control DPD. Notwithstanding this, we do not consider it appropriate to continue to enforce the separation of roads and footpaths. Manual for street advocates inclusive development with emphasis on pedestrian movements through integration of streets and footpaths which serve to naturally slow traffic speeds. (045)
17. No, give direct foot and cycle paths i.e. the shortest distance. (052)

18. Yes, but is there a map of these footpaths? They can be so well hidden that no-one knows where they are. (081)
19. Yes, where this helps to promote sustainable transport options (with the associated benefits of lower CO2 emissions and potential enhancement of the local environment). (090)
20. The emphasis should be on encouraging green travel choices to be made. The provision of safe and attractive walkways and cycle-paths is key to achieving this. (088)
21. The separation of roads and footpaths should be reviewed as part of a sustainable transport network. (096)
22. Provide footpaths that are lit and visually policed. (041)
23. Yes, but reduce the number of underpasses by the use of pedestrian/cycleway bridges where land contours permit. (097)
24. Split cycles from pedestrian where possible. (097)

Officers Response to comment(s)

1. Officers note the comment
2. Officers note the comment
3. Officers note the comment
4. Officers note the comment
5. Officers note the comment
6. Officers note the comment
7. Officers note the comment
8. Officers note the comment
9. Officers note the comment
10. This response does not answer the question.
11. Officers note the comment
12. Officers note the comment
13. Officers note the comment
14. Officers note the comment
15. Officers note the comment
16. Officers note the comment
17. Officers note the comment
18. It is not considered feasible to map all footpaths in the Borough.
19. Officers note the comment
20. Officers note the comment
21. Officers note the comment
22. This response does not answer the question.
23. Officers note the comment
24. Officers note the comment

Action to be taken with comment

None.

Summary of Representations to Question 40

Question No.	Question Title
40	Can you think of any other distinctive characteristics of Redditch which may be important to continue as 'features' in new development?

URN of Consultees

001; 003; 008; 009; 010; 011; 016; 017; 033; 035; 037; 038; 041; 042; 049; 080; 081; 083; 092; 096; 097 Total of 42 Respondents.

Summary of Comment(s)

1. Woodland and open character with grassland areas, as in the summer the town has an almost semi-rural feel, which is important. (016)
2. Landscaped Road islands – make these 'circle roads' kept open for walkways e.g. Holloway Head in Birmingham. (003) (010) (017)
3. Ensure trees are planted in all new developments. (010)
4. Church Green and adjoining areas. (011)
5. Keep car parking free or cheap. (008)
6. Once famous for needles, fishing rods and equipment. Retain what small amount remains. (035)
7. Low density residential development particularly in peripheral areas; reasonable private amenity space provision; off street parking provision. (042)
8. Any heritage or history should be maintained. (037)
9. Parks, green spaces and green landscaping. (033) (038) (083)
10. Its trees, shrubs and grass verges. (009)
11. The highway road network. (001)
12. Minimise traffic lights to allow fast transit. (001)
13. Table on Page 72 mentions subways but not pedestrian bridges e.g. St Augustines/ Stonepitts Lane and over Bromsgrove Highway to Pitcheroak Wood. (092)
14. Plenty of playing fields and woodlands. (080)
15. Continue to shelter housing from roads and tuck away behind trees/shrubs – love this. (081) (097)
16. Existing watercourses should be considered and developed as local features (096)
17. Landscaping and cleanliness, requirement for biodegradable chewing gum. (041)
18. The structure planting that was developed in the New Town is highly distinctive and functional. Future maintenance should ensure that the original design parameters, species mixes and densities are perpetuated. Change through lack of investment, understanding or commitment will inevitably result in the degradation of the landscape, to the town's detriment. (049)
19. Continue with open market traders around Church Green and Alcester Street. (007) (097)

Officers Response to comment(s)

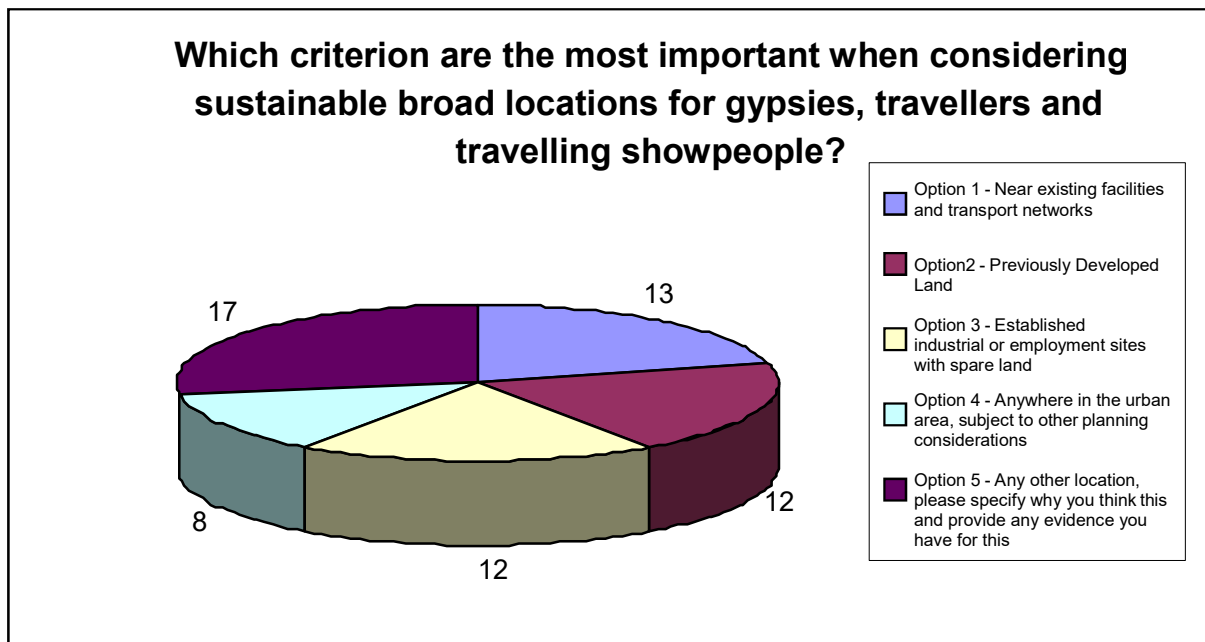
1. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
2. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
3. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
4. Church Green is already designated as a Conservation Area.
5. This is not a relevant response to this question.
6. This does not suggest a feature that could be used in new development.
7. None of these suggestions are considered to be distinctive to Redditch Borough.
8. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
9. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
10. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
11. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
12. This is not a relevant response to this question.
13. Noted

14. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
15. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
16. None of these suggestions are considered to be distinctive to Redditch Borough.
17. This is not a relevant response to this question.
18. This is already considered to be a distinctive feature of Redditch Borough as documented in the Distinctiveness Document.
19. None of these suggestions are considered to be distinctive to Redditch Borough.

Action to be taken with comment

None.

Responses to Question 41



Summary of Representations to Question 41 Option 5

Question No.	41	Question Title	Which criterion are the most important when considering sustainable broad locations for gypsies, travellers and travelling showpeople? <i>Option 5 – Any other location, please specify why you think this and provide any evidence you have for this</i>

URN of Consultees

003; 007; 008; 009; 015; 021; 028; 033; 035; 041; 049; 050; 052; 081; 088; 092; 095; 097. Total of 17 Respondents.

Summary of Comment(s)

1. An area of open land, in which they have responsibility for the site. (015)
2. None of the options should be encouraged. (003)
3. Earth boundaries should not be used, lockable gates should be used. (003)
4. The provision of sites should be based on evidence. (028)
5. The identified need for a temporary stopping site (identified through the SHMAA) should be considered through collaborative working with Bromsgrove. (028)
6. Not near existing residential areas. (008)
7. Waste land outside Borough boundary unfit for other purpose. (035)
8. Occasionally park up with horses on the green outside Halfords and always clean up. (007)
9. Any poor quality locations. (033)
10. In the outer Hebrides. (009)
11. No locations to be made available to groups who do not pay local taxes to help maintain roads and rubbish collections etc. (095)
12. A specific site with shower and laundry facilities. The lack of these leaves them forced to

- park on odd corners of grassland. This is dangerous for their children and dogs. (050)
13. Context document does not refer to a Gypsy and Travellers Accommodation Assessment for the South Housing Market Area of the West Midlands 05/03/08. (092)
14. Have these criteria been consulted with the community. (052)
15. If we absolutely have to provide these, then they should be as far away as possible from town centre and urban areas. QUESTION: If tax payers have to fund these, is there to be any charge to the users? We have to pay council tax for such facilities, so why shouldn't they pay to use them? (081)
16. Privilege not a right, away from strategic networks for example Feckenham. (041)
17. 'Development plans should ensure that adequate provision is made for suitable sites to accommodate gypsies and other travellers. Such provision should reflect the order of demand in the area as indicated by the trends shown by the ODPM annual count and any additional local information'. This information has not been provided in the Issues and Options document, so it is not clear how Redditch Borough Council arrived at their options. Options should reflect trends in the ODPM annual count and any additional local information.
18. Provision should be made for on site storage and collection of wastes that residents on these sites want to discard. (049)
19. Around the edges of the Borough so they don't feel hemmed in by urban development. (097)
20. Should Option 3 be pursued it must accord with WMRSS Policy PA6b, The protection of employment land and premises. Whichever Option is pursued it should accord with Policy CF9 "Development Plans should ensure that adequate provision is made for suitable sites to accommodate gypsies and other travellers. Such provision should reflect the order of demand in the area as indicated by the trends shown by the ODPM annual count and any additional local information." (021)
21. Whichever Option is chosen, designated sites should be protected. (088)

Officers Response to comment(s)

1. Officers assume the respondent is referring to open space, it is considered that some existing open space could be suitable for gypsies, travellers and travelling showpeople but this would not be included as a criterion in a policy.
2. The Circular (01/2006) states that Local Authorities must make provision for gypsies, travellers and travelling showpeople where there is an identified need, therefore this response is not appropriate.
3. This is not an appropriate response.
4. A Gypsy and Traveller Accommodation Assessment has being carried out to assess the need in Redditch Borough.
5. Officers note the comment
6. This is not an appropriate criterion to be included in a policy.
7. The Core Strategy only covers the administrative area of Redditch Borough. Therefore sites outside of the boundary cannot be considered.
8. This is not an appropriate response.
9. This is not an appropriate criterion to be included in a policy.
10. This is not an appropriate response.
11. The Circular (01/2006) states that Local Authorities must make provision for gypsies, travellers and travelling showpeople where there is an identified need, therefore this response is not appropriate.
12. This is not an appropriate criterion to be included in a policy.
13. This document was not available when preparing the context document for the Issues and Options Stage.
14. This was the purpose of the question in the Issues and Options Document.
15. The Circular (01/2006) states that Local Authorities must make provision for gypsies, travellers and travelling showpeople where there is an identified need, therefore this response is not appropriate. The question regarding taxes is not a spatial planning matter.

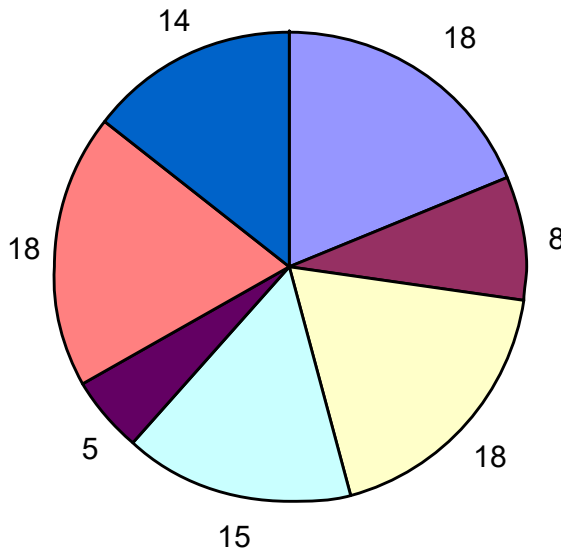
16. This is not an appropriate criterion to be included in a policy.
17. It is considered that the options presented were not based on trends shown in the annual count, the intention of the question was to establish broad criterion to be included in a policy. A Gypsy and Traveller Accommodation Assessment has been carried out to assess the need in Redditch Borough.
18. This is likely to be considered as part of a general sustainability policy within the Core Strategy.
19. This is not an appropriate criterion to be included in a policy.
20. Officers note the comment
21. Officers note the comment

Action to be taken with comment

None.

Responses to Question 42

What should be the transport requirements expected of new developments in Redditch Borough?



- Option 1 - Transport Assessment to accompany any new development regardless of size
- Option 2 - Transport Assessment should only be sought for planning applications involving a significant travel demand, as currently sought by the WMRSS Preferred Option document
- Option 3 - To ensure the development is located within 250m of passenger transport (bus stop or train station)
- Option 4 - A green travel plan to accompany any new development regardless of size
- Option 5 - Green travel plans should only be sought for certain developments, as set out by PPG13 – Transport
- Option 6 - All developments to be accessible to all modes of transport
- Option 7 - In some other way, please specify why you think this and provide any evidence you have for this

Summary of Representations to Question 42 Option 7

Question No.	Question Title
42	What should be the transport requirements expected of new developments in Redditch Borough? <i>Option 7 – in some other way, please specify why you think this and provide any evidence you have for this</i>

URN of Consultees

003; 007; 008; 010; 027; 031; 041; 045; 049; 080; 084; 090; 094; 097. Total of 14 Respondents.

Summary of Comment(s)

1. With the elderly in mind- encourage private 'small' mini bus routes to all residential areas (10am – 8pm, 7 days) (010)
2. People should be made aware of public transport. (003)
3. Area Travel Plans should be sought where there are a number of neighbouring sites to be allocated for development. (027)
4. Travel plans need to be prepared in accordance with DfT Circular 02/2007 'Planning and the Strategic Road Network'. (027)
5. Facilities for the disabled. (008)
6. Control heavy lorries on road next to residential sites i.e. Alders Drive is noisy/carbon emissions. (007)
7. Development of the site at north west Redditch would promote the use of sustainable modes of movement. Bus stops would be located strategically within the development, a maximum of 250m away from residential dwellings. (031)
8. Every large scale development should be accessible for larger vehicles, of which the minimum size should be able to accommodate emergency vehicles. (031)
9. Support option 2. Local planning policy should be consistent with regional planning policy. Option 2 would achieve this consistency. The rigid options 3 and 6 are likely to be overly constraining on development and would result in the borough failing to meet housing and employment requirements. (005)
10. A transport assessment must accompany any development of more than 200 houses. (084)
11. RBC is not the highway authority and it's not within their remit to request provision of transport assessments or green travel plans for all developments. (045)
12. Overlap with planning checklist and is actually a development control function rather than one of planning policy. (045)
13. Object to use of word "requirement". It is clearly desirable to ensure that development is located within 250m of a bus stop which is reflected in good practice guidance. However it is only guidance. Designing new development around a requirement to ensure all new properties are within 250m of a bus stop could stifle urban design principles and result in other objectives, such as energy efficiency not being achieved. With any new developments there are a number of competing interests of equal importance. Balance these to achieve overall objectives. Include a series of sustainability objectives which developments should aim to achieve. (045)
14. A full reassessment of the problems of traffic congestion, traffic flows and traffic routes in the Mount Pleasant area. (080)
15. In all cases development should be accessible by a range of transport modes and emphasis should be placed on walking and cycling infrastructure, especially where this can form part of a wider Green Infrastructure network. (090)
16. Immediate access to public transport should also be a prerequisite for larger developments, perhaps through the inclusion of bus stops for all applications over a certain size (to be determined by the Council). (090)
17. New railway at Bordesley with secure parking. (041)
18. Passing bays at railway for aggregate freight. (041)
19. Whilst it is the responsibility of the district council to seek Transport Assessment (TA) for relevant planning applications for new developments, the more comprehensive the approach the easier it will be to implement the right solutions to meet the priorities in Q.44 (creating a sustainable transport network). All development will generate travel demand and this needs to be considered and balanced against the resource implications of delivering a TA. Transport Study (TS) should be undertaken for smaller development particularly as there is sometimes more travel demand generated than initially expected. (049) (094)
20. The Department for Transport recommend that a TS is undertaken for 50+ residential dwellings (100+ for a TA), 500m² for Retail/leisure development (1,000m² GFA for a TA) and 1000m² for industrial/ commercial (2,500m² GFA for a TA). However, there are circumstances where a TS or TA would be required irrespective of the above thresholds (for example where a development will affect the performance or requirements of a Passenger Transport Network). (049) (094)

21. Travel Plans are only as successful as their implementation. If the measures cited in the plan are not adopted and their performance monitored then they are completely inefficient. Therefore, it would be more effective to have fewer plans with the resources guaranteed to enforce them. (049) (094)

22. It is recommended that all new developments must be expected to be wholly sustainable. To be consistent with national, regional and local policies, it is important to adopt a sequential approach to identifying transport infrastructure requirements. These will include:

- identifying the potential trip rates (access all transport modes) for proposed new developments
- Assessing which trips could realistically be made by sustainable transport modes (such as walking, cycling and passenger transport) and the investment in infrastructure and services that would be required to support these trips (together with estimates of capital and operating costs).
- Assessment of the residual trips which will have to be made by car, and the additional highway capacity that would be required to cater for these trips whilst maintaining efficient operation of the existing highway network, again with costs. (049) (094)

23. Any new developments in Redditch Borough must aim for an absolute minimum generation of car trips, in order to encourage sustainable living. This can be achieved by demanding that Transport Assessments are completed with road building considered as an absolute last resort, in favour of appropriate infrastructure for pedestrians, cyclists and passenger transport, which will provide the most expeditious routes to key health, education, leisure, employment and retail opportunities. (049) (094)

24. Re-introduce evening bus services. There is already terminal traffic congestion in the A441 both at the northern and southern boundaries of the Borough at any peak period during the day. (097)

Officers Response to comment(s)

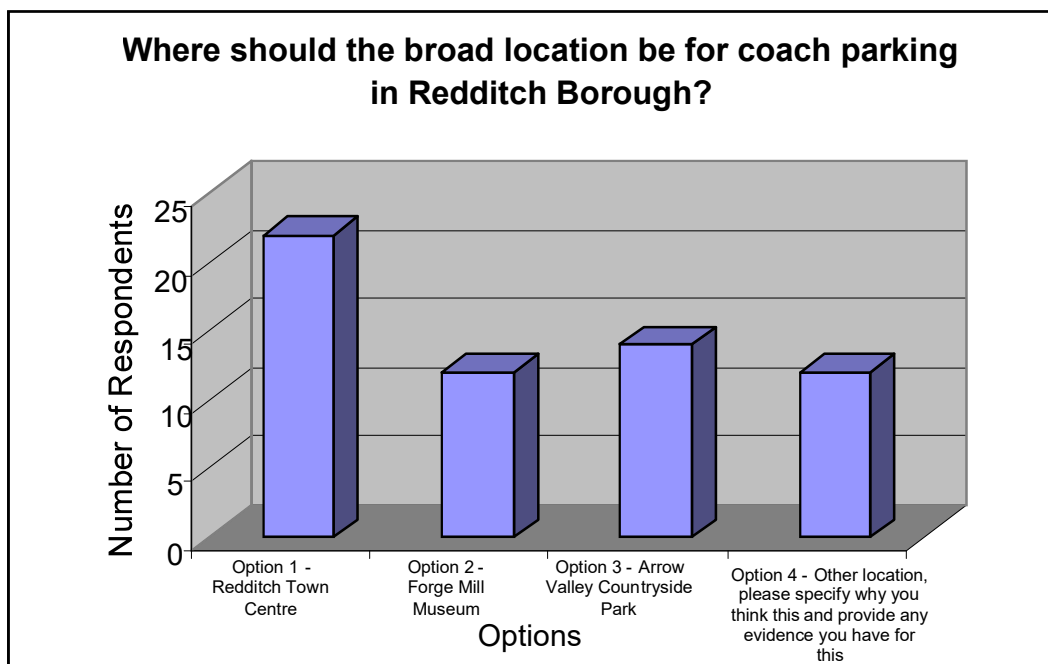
1. This is not considered an appropriate requirement from new developments.
2. This is not considered an appropriate requirement from new developments.
3. This is considered an appropriate approach to this issue but does not present an alternative option.
4. Officers note the comment
5. It is not clear how transport requirements expected of new development link to facilities for disabled persons.
6. This is not considered an appropriate requirement from new developments.
7. This is not an appropriate response to the question because this is only specific to one site.
8. This is a standard requirement for all developments from Worcestershire County Council Highways Partnership Unit.
9. Officers note the comment
10. This is considered an appropriate approach to this issue but does not present an alternative option.
11. It is not anticipated that Transport Assessments or Green Travel Plans would be requested from ALL new developments. Even though RBC is not the Highway Authority, as the Local Planning Authority these can be requested.
12. It is anticipated that a policy relating to Transport Assessment and Travel Plans will be presented in the Preferred Draft Core Strategy.
13. Officers accept that this is viable option, but may be related to general sustainability rather than a focus on transport.
14. This is not an appropriate response to the question because this is only specific to one site.
15. This is suggested as an option in question 44
16. It is not feasible to request new bus stops as part of any developments because the Borough Council cannot control commercially operated bus services.

17. This is not an appropriate response to the question because this is only specific to one site.
18. This is not considered an appropriate requirement from new developments.
19. Officers note the comment
20. Officers note the comment
21. Any criterion within a transport policy would have to be fully monitored and included within the Delivery Framework with reference to the resources needed and key delivery agents.
22. It is anticipated that a policy relating to Transport Assessment and Travel Plans will be presented in the Preferred Draft Core Strategy.
23. It is anticipated that a policy relating to Transport Assessment and Travel Plans will be presented in the Preferred Draft Core Strategy.
24. This is not an appropriate response to the question because this is only specific to one site.

Action to be taken with comment

None.

Responses to Question 43



Summary of Representations to Question 43 Option 4

Question No.	Question Title
43	Where should the broad location be for coach parking in Redditch Borough? <i>Option 4 – Other location, please specify why you think this and provide any evidence you have for this.</i>

URN of Consultees

009; 011; 035; 049; 050; 080; 081; 088; 094; 095; 095; 096; 097. Total of 13 Respondents.

Summary of Comment(s)

1. Set down passengers in Town and then parking space should be away from Town. (011)
2. Any location with local transport (i.e. coach) to town. (035)
3. Do you mean a park-ride facility? (009) (095)
4. Near the Abbey Stadium as there is no room in the Town Centre. (050)
5. Perhaps Edward Street – where an urban park and museum can be created. This is so convenient to the Town Centre. (080)
6. On the outskirts of the town centre, within walking distance of the same – if such a site is, or could be made available. (081) (096)
7. Whilst it is important to have the location in a central, accessible location (option 1) could Glover Street car park be considered? Car parking should be available close to the coach park and there is also a section of waste ground adjacent to the site with development opportunity. This suggestion is made following an extensive piece of technical assessment work as part of the passenger transport area review for Redditch. Coach parking must be located where it promotes onward access to other modes (Grove St meets this objective). (049) (094)
8. It would seem sensible to locate coach parking at whichever site provided the best access to the greatest number of points of interest within the Borough, thus reducing the need to travel by car/coach to other local sites. (088)
9. It should have been immediately to the south of the railway station but this has been allowed to be built on. (097)

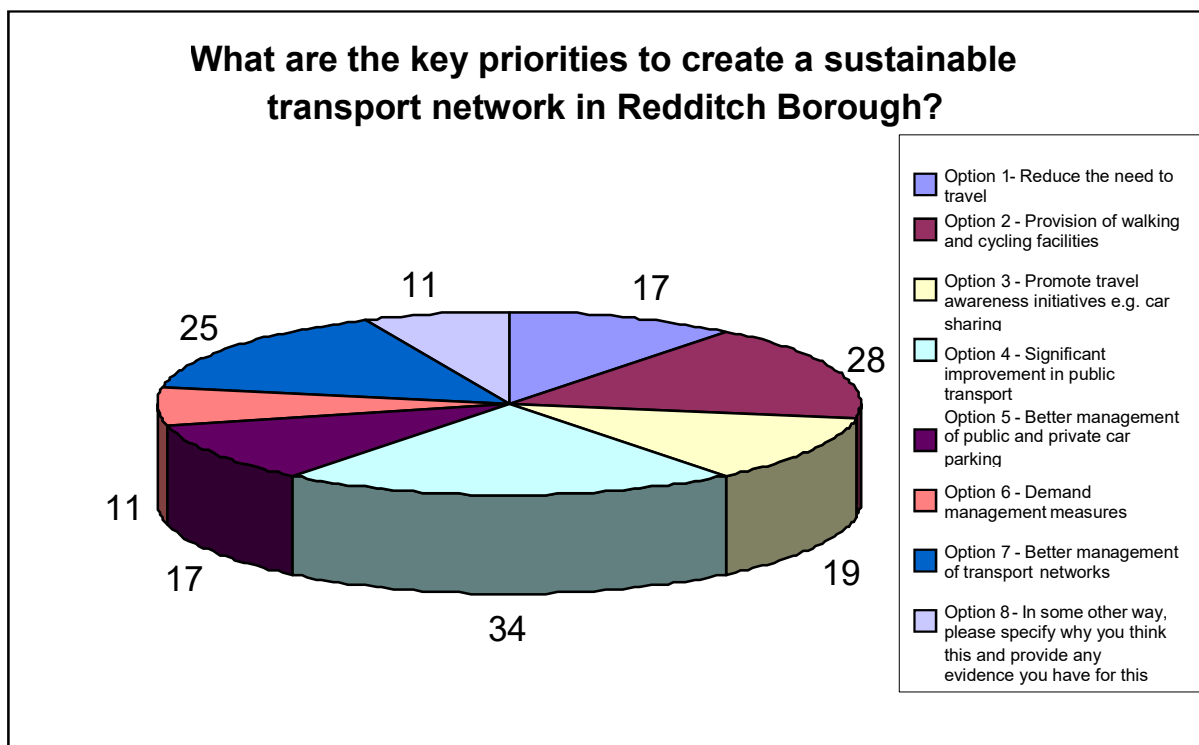
Officers Response to comment(s)

1. This is noted as a viable option.
2. This response is not specific enough.
3. A park and ride facility would not be appropriate in Redditch Borough.
4. This is noted as a viable option.
5. Edward Street site is likely to be included as a strategic site in the Core Strategy. As a strategic site it is likely to be encouraged for employment purposes.
6. This is noted as a viable option.
7. This response is assumed to relate more to a park and ride facility and not to a potential location for a coach park. In any case, the car park assumed on Grove Street is in private ownership for the use of the retail facilities on site and the presumed waste ground adjacent has been developed.
8. Noted.
9. This is not a reasonable site for a coach park.

Action to be taken with comment

None.

Responses to Question 44



Summary of Representations to Question 44 Option 8

Question No.	44
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Question Title	What are the key priorities to create a sustainable transport network in Redditch Borough? <i>Option 8 – in some other way, please specify why you think this and provide any evidence you have for this.</i>
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URN of Consultees

002; 007; 011; 030; 031; 035; 049; 080; 083; 094; 096; 097. Total of 11 Respondents.

Summary of Comment(s)

1. Avoid penalising parking as this drives customers out of town/ cheaper parking in car parks. (011) (080)
2. Limit the amount of cars per household. (035)
3. Better links along the highways and byways i.e. Icknield Street Drive. (007)
4. There is need to reduce the need to travel to ensure that a minimum amount of Co₂ emissions are omitted. To achieve this, employment land should be integrated within large development sites. This will ensure that people will not be commuting long distances in their cars. (031)
5. Almost free public transport. (002)
6. There is no justification for the Council to propose the management of private car parking. This is a matter for its normal regulatory function through development control and for national policies. (030)
7. A reliable bus service, serving all areas and at suitable times. (083)
8. Support aim of option 1. The proposed Webheath site would help to meet this objective, by locating development on the edge of Redditch, thereby maximising the use of existing

infrastructure whilst providing an opportunity to integrate with the existing surrounding development. (045)

9. All options need to work together to succeed. (049)

10. Ensure all trip attractors are directly linked to the core passenger transport network, and are made easily accessible by bicycle or on foot. (049)

11. Develop and promote car-parking standards, which actively promote use of sustainable modes and encourage modal shift. (049)

12. Encourage intensification of development along existing passenger transport corridors, maximising potential patronage of the existing network, ensuring that bus/rail services are commercially sustainable. (049)

13. Option 1 - PPG13 ? Reduce the need to travel. Paragraph 4.9 of PPS12 emphasises the importance of the evidence base in the preparation of development plan documents. It states that local planning authorities should ensure that the delivery of housing and other strategic and regional requirements is not compromised by unrealistic expectations about the future availability of infrastructure, transportation and resources, and makes reference to the further guidance given in Annex B on this aspect. Paragraph B14 of Annex B makes clear that a key transport-related aspect of a development plan document is to set out proposed improvements to the transport network in support of the Core Strategy. However, the paragraph also makes clear that local planning authorities need to be realistic about what can be implemented over the plan period, and that scheme proposals should only be included when there is a strong commitment from the relevant delivery agency. A clear distinction should also be made between scheme proposals and safeguarding potential transport routes. (096)

14. Option 5 relates to the approach to car parking, suggesting that in new developments car use should be minimised through controlling car parking. The amount of car parking included in any development needs to reflect a balance between commercial considerations related to the deliverability of the proposed land uses, and measures to encourage the use of alternative means of transport to the private car. The latter can potentially be achieved in part through an appropriate mix of housing and employment uses in Redditch, providing the opportunity for people to live close to their place of work. (096)

15. All of the options contribute towards creating a sustainable transport network and need to work together to succeed. Therefore, the better management of car parking is critical in influencing travel choice (increasing the attractiveness of passenger transport verses the private car) and should be of equal importance. This will certainly affect the deliverability of Options 3, 4, and 7 from a transport planning perspective. (094)

16. Ensure ALL trip attractors (key services and facilities) are directly linked to the core passenger transport network, and are made easily accessible by bicycle, or on foot, such that the car is not automatically considered as the only mode of choice for access to these services and facilities. (094)

17. Develop and promote car-parking standards and pricing policies, which will actively promote the use of sustainable modes and thus encourage modal shift. (094)

18. Re-open the railway line south of Redditch station to some form of light rail or Maglev usage. (097)

Officers Response to comment(s)

1. Parking fees are not controlled by the planning department therefore this is not a valid option.

2. The planning system cannot limit the number of cars a household can own.

3. It is unclear what 'links' can be improved to create a sustainable transport network.

4. If this response suggests that mixed uses should be advocated to reduce the need to travel, then officers would support this approach. If the response suggests that employment land should be integrated into existing areas of development in the Borough to reduce the need to travel, then officers do not consider that there is sufficient land available to meet the employment needs. If the response suggests that employment sites should be large so as to concentrate development where it reduces the need to travel, officers consider that this would not be a sustainable approach.

5. The planning system cannot control the price of public transport.

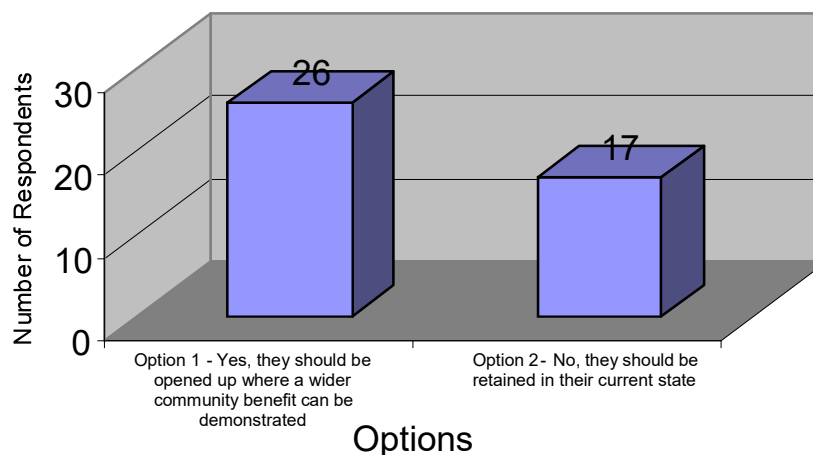
6. Officers consider this to be a viable option.
7. Although the provision of bus services is not a spatial planning matter, Officers will endeavour to facilitate this.
8. Officers consider this to be a viable option.
9. Officers note the comment
10. Officers consider this to be a viable option.
11. Car parking standards are adopted by Worcestershire County Council and it is not envisaged that the Core Strategy will need to repeat or justify a change to these in a policy.
12. It is not the purpose of the planning system to encourage commercial viability of bus routes, however the location of development on passenger corridors is considered to be a viable option.
13. This is likely to be a consideration when preparing a Delivery Framework in the Core Strategy.
14. Officers note the comment
15. Officers note the comment
16. This is likely to be achieved indirectly through the Development Strategy.
17. Car parking standards are adopted by Worcestershire County Council and it is not envisaged that the Core Strategy will need to repeat or justify a change to these in a policy.
18. It is not considered to be feasible to re-open the railway line south of Redditch railway station, however improvements to the rail service between Redditch and New Street is anticipated to receive enhancements in the near future.

Action to be taken with comment

7. Consider presenting issues regarding future growth to bus operators.

Responses to Question 45

Should public transport routes (bus and emergency vehicles only) be opened up to general traffic if there is a wider and demonstrable community benefit e.g. the regeneration of a District Centre?



Summary of Representations to Question 45

Question No.	Question Title
45	Should public transport routes (bus and emergency vehicles only) be opened up to general traffic if there is a wider and demonstrable community benefit e.g. regeneration of a District Centre?

URN of Consultees

049; 094. Total of 2 Respondents.

Summary of Comment(s)

- Option inconsistent with other areas of the paper. Strongly oppose relaxation of restrictions of the use of bus ways (and other bus priority facilities) which allows access to any vehicles because it does not conform to best practice in the Integrated Passenger Transport Strategy (IPTS). Bus priority is vital to delivering efficient and effective bus service routes 57 and 58 in particular. Withdrawal of bus ways would lead to reduction in operating speeds, increases in bus journey times and operating costs, decline in bus service reliability, decline in passenger transport accessibility, and decline in commerciality of these services, reduction in frequency of the services or to a withdrawal of the operation of the service on a commercial basis. (049) (094)
- There are adequate access roads to each District Centre, which are open to general traffic and offer plentiful free car parking provision. (049) (094)

Officers Response to comment(s)

1. It was never an intention to remove the priority of buses if a public transport route were to be opened up to general traffic. Neither would bus-ways be withdrawn as suggested by the respondent but the intention was to allow some general traffic to access specific sections only to improve access to community facilities, other services and schools.
2. If the Core Strategy continues to promote the redevelopment of the New Town District Centres then access to these services needs to be reconsidered. In order to facilitate some aspects of the redevelopment, it may be necessary to allow limited access onto the bus routes for general traffic to ensure delivery of schemes.

Action to be taken with comment

None

Summary of Representations to Question 46

Question No.	Question Title
46	How should the needs of cyclists be best accommodated?

URN of Consultees

001; 002; 003; 004; 007; 010; 011; 012; 016; 017; 019; 023; 024; 030; 031; 033; 035; 036; 038; 039; 040; 041; 042; 049; 051; 052; 080; 081; 082; 083; 084; 088; 090; 095; 096; 097. Total of 36 Respondents.

Summary of Comment(s)

1. Provide more cycle only routes; cycle lanes should be marked along all roads and highways, not isolated hedged pathways (due to fear of crime). (010) (016) (038) (039) (052) (083) (097)
2. Establish missing links e.g. Sustrans, New Town development footpaths and build new cycle ways in new developments. (017)
3. Separate road and cycle lanes. (004) (019) (097)
4. Wide, smooth cycle lanes. No steep gradients or sharp bends. Safe lockable storage for bicycles. (011)
5. Well defined, safe cycle paths. (003) (088)
6. Cycle lanes only in any new development. (036)
7. Not much can be done beyond the existing cycle lanes (possible priority for children during school times). (035)
8. Not use the road or footpaths as these are for walkers/disabled. Get cars off footpaths. (012) (080)
9. Canal ways use more footpaths / cycle paths. Never enough of them. (007)
10. It may be feasible in parts of the Borough to relocate some road space; road verges to dedicated cycle routes. (042)
11. Cycle priority measures at major junctions should be investigated. (051)
12. Secure parking. (039)
13. Maintain and provide quiet, safer routes. (024) (040)
14. Phase in no parking in cycle lanes. (040)
15. Cycle forum/club to be supported by Council. (040)
16. Aim to at least quadruple the share of journeys made by bike in line with national cycling strategy. (040)
17. Implement a hierarchy for transport users. (040)
18. Respect walking and cycling as a modal choice. (040)
19. White road lining, parallel to kerbs. (033)
20. A cycle route should be as direct as possible, as hassle - free as possible, at least two

- meters wide, without pinch-points, and without need to dismount. (011)
21. More awareness of cyclists to other road users. (023)
 22. Signage. (023) (001)
 23. Safety road courses. (023)
 24. The development of new sites should integrate the needs of cyclists, catering for cyclists off road and on road, providing safe cycle storage and facilities. (030)
 25. A cycle route network should be provided as part of the CIL. (031)
 26. Get rid of cars by having a bypass. (002)
 27. Promoting cycling should be a strategic objective. This can be done by providing a comprehensive, safe, cycle network in the Borough and requiring new development to meet the needs of cyclists. (030) (031)
 28. Green travel plans for employment development should make provision for adequate changing rooms, showers and lockers etc. (030) (031)
 29. By retaining the current footpath network. (095)
 30. There is ample accommodation already. (084)
 31. Easy hire bike scheme – see Vienna and Bristol. (082)
 32. Parking at schools, 20km limit in all residential areas including one way systems. (082)
 33. Publish a map of direct routes for cyclists and pedestrians. (001) (052)
 34. Pathways used for cycle lanes where wide enough. (081)
 35. Through inclusion of a network of cycle-ways in a Green Infrastructure strategy and through provision of secure cycle storage and changing facilities in major employment developments. (090)
 36. The needs of cyclists should be considered in new developments. (096)
 37. Illuminated cycle paths with visual policing. (041)
 38. RSS Policy T3 Walking and cycling - give pedestrians priority in residential areas and Town Centres. (049)

Officers Response to comment(s)

1. Although Redditch Borough cannot deliver more cycle routes through the system, it may be appropriate for a Core Strategy policy to require new development to provide adequate walking and cycling routes and to take account of existing provision within any sites local environment.
2. It is unclear what the missing links are referring to and it is considered that a National Cycle Network runs through Redditch with no distinguishable missing links. In terms of new cycle ways in new developments, it may be appropriate for a Core Strategy policy to require new development to provide adequate walking and cycling routes and to take account of existing provision within any sites local environment.
3. In established areas it would not be feasible to create cycle paths. However in new developments it may be appropriate for a Core Strategy policy to require new developments to provide adequate walking and cycling routes, and to take account of existing provision within any sites' local environment.
4. It is not possible to ensure all cycle lanes are provided on flat sites, especially because of the hilly nature of some areas of the Borough. In terms of provision of cycling facilities the Code for Sustainable Homes considers this as a way of improving sustainability.
5. As a Local Planning Authority, officers consider that we have no control over the definition of cycle paths.
6. Although Redditch Borough cannot deliver more cycle routes through the system, it may be appropriate for a Core Strategy policy to require new development to provide adequate walking and cycling routes and to take account of existing provision within any sites local environment.
7. It is not feasible to restrict the use of cycle lanes in this way.
8. In some older established areas of the town it may not be possible to provide cycle ways distinguishable from the road or footpath. In terms of the comment about cars on footpaths this is not a spatial planning matter.
9. There are no canals in Redditch Borough.
10. This is considered to be a viable option.
11. In appropriate circumstances this may be a feasible option, however it is not a spatial

planning matter and this comment will be passed to Worcestershire County Council Transport Dept.

12. In terms of provision of cycling facilities the Code for Sustainable Homes considers this as a way of improving sustainability.

13. The Core Strategy is not able to maintain existing cycle ways, however inclusion of safety is considered a viable option. It may not be feasible for cycle ways to be 'quiet' especially in established urban areas.

14. It is not a spatial planning matter to regulate parking in cycle lanes however this comment will be passed to Worcestershire County Council Transport Dept.

15. Officers consider that the existing methods of communication between relevant stakeholders are sufficient without the need for a cycle forum/club.

16. This could be used as an indicator in the Delivery Framework for the Core Strategy.

17. Giving priority to walking and cycling is a requirement in the West Midlands Regional Spatial Strategy.

18. Giving priority to walking and cycling is a requirement in the West Midlands Regional Spatial Strategy.

19. This is too detailed for consideration.

20. The actual design of cycle routes is not within the control of a Local Planning Authority. Officers consider pinch-points to mean kerb build-outs on opposite sides of a road which narrows the road to just allow a single vehicle flow. This gives priority to one direction of flow and is therefore not related to cycle lanes. In terms of being as direct as possible, this would depend on where the user wants to go therefore it may not be feasible. However cycle routes could to be directed towards areas where there are services and facilities. It is unclear how cycle routes could be 'hassle free'.

21. It is not a spatial planning matter.

22. Officers consider that where appropriate Section 106 monies could be collected to improve signage.

23. It is not a spatial planning matter.

24. It may be appropriate for a Core Strategy policy to require new development to provide adequate walking and cycling routes and to take account of existing provision within any sites local environment. In terms of provision of cycling facilities, the Code for Sustainable Homes considers this as a way of improving sustainability.

25. Cycle routes are included in the list of items which the Council could collect monies for in question 8.

26. This comment does not specifically reference which 'bypass' is being considered and this is not considered a viable option for improving the provision for cyclists.

27. An objective concerning sustainable transport has already been developed.

28. This is considered to be an existing acceptable part of Green Travel Plans however the content of Green Travel Plans is not a matter for the Core Strategy.

29. There are no reasons to alter the current footpath network.

30. Officers note the comment

32. Because of the indoor nature and predominantly pedestrianised nature of Redditch Town Centre, officers do not consider this to be a feasible option.

33. Officers consider that provision of facilities would not be constrained by any planning policy. In terms of restriction of speed limits, this is not a function of the Local Planning Authority.

34. Redditch Borough has a map of cycle routes already. In terms of walking routes this is currently being investigated.

35. This is considered to be a viable option.

36. Officers note the suggestion of a Green Infrastructure Strategy. Cycle storage and changing facilities are recognised elements of Green Travel Plans, which are suggested as an option for question 42.

37. Officers note the comment

38. These are not within the control of a Local Planning Authority.

39. Giving priority to walking and cycling is a requirement in the West Midlands Regional Spatial Strategy.

Action to be taken with comment

11. Consider passing on this comment to Worcestershire County Council Transport Dept.

Summary of Representations to Question 47 Option 4.

Question No.	47	Question Title	How can we improve the flexibility and adaptability of housing in Redditch Borough? <i>Option 4 in some other way, please specify why you think this and provide any evidence you have for this</i>
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URN of Consultees

005; 010; 017; 030; 031; 035; 045; 080; 097. Total of 9 Respondents.

Summary of Comment(s)

1. The concept of a retirement village e.g. propose Marlfield farm school site. (017)
2. Providing safe, secure (warden controlled) village for the over 65s, adjacent to option 2. Providing singles, no children locations and providing family and mixed options. (010)
3. We all live here and all should have the same rights. (035)
4. There needs to be provision for all types of housing. (030)
5. The needs of young people should be taken into account. (030) (031)
6. The needs of the elderly are not the same as the needs of a family. The core strategy needs to ensure that there is proper provision of all housing types including a range of accommodation for the elderly across all tenure types. (030) (031)
7. Suitable housing should be supplied for elderly residents in Redditch. Look favourably on sheltered housing schemes for the over 55's in highly sustainable locations with good access to public transport, services and facilities as per Option 2. (005)
8. Note that national guidance does not require dwellings to be produced to Lifetime Homes standards until 2013, as highlighted by DCLG in "Lifetime Homes, Lifetime Neighbourhoods". Therefore object to Option 3 because it is in advance of the timescale and therefore inconsistent with national planning policy. (005)
9. Should not be included in a core strategy. Set out strategic objectives and the delivery mechanism. Not appropriate to require all developments to be constructed to lifetime homes standards as this takes no account of the type of development proposed or likely demographic of future residents. Supportive of principle of allocation and promotion of sites for specialist care developments. (045)
10. Ensure enough/proper parking for such facilities. Ensure FULL environmental and pollution studies are done at the planning stage for all new developments (consider the recently thrown out plan to build a 60 bed nursing home in Plymouth Rd.) (080)
11. Provide a better mix of housing in new developments, including affordable housing, for younger or single people working in the Borough; not just very expensive houses wedged in on top of each other to line the pockets of "get rich quick" developers and builders (who currently seem to be experiencing the repercussions of their greed). (097)

Officers Response to comment(s)

1. This response is too detailed in its reference to a particular site; however the concept of a retirement village is a viable approach and would constitute a specialist development as suggested in option 1.
2. The concept of a retirement village is a viable approach and would constitute a specialist development as suggested in option 1.
3. Officers note the comment

4. Officers note the comment
5. Officers note the comment
6. Officers note the comment
7. Officers note the comment
8. The Core Strategy is anticipated to be adopted in 2011 and will last until 2026, therefore it is considered appropriate.
9. The Issues and Options Document suggested that a proportion of new developments be constructed to Lifetime Homes standards and not ALL development.
10. Parking standards are set by the County Council; Officers consider these standards will not be altered through the Core Strategy. With regard to specific planning applications, the appropriate site studies should be carried out to support such an application. In this case planning applications will be considered on their individual merits.
11. Providing a mix of type and size of housing is a national requirement, as it the provision of affordable housing, the emerging Core Strategy will be in conformity with all national planning policy.

Action to be taken with comment

None.

Summary of Representations to Any Other Comments

Question No.	N/A	Question Title	Any other comments
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URN of Consultees

001; 002; 003; 007; 008; 009; 010; 013; 016; 017; 019; 023; 024; 027; 028; 029; 031; 033; 036; 037; 038; 040; 041; 042; 050; 052; 080; 081; 082; 083; 084; 086; 093; 095; 097. Total of 35 Respondents.

Summary of Comment(s)

1. Woodland, open spaces and wildlife area should be managed to encourage Biodiversity. (016) (038)
2. Leisure facilities in open spaces are very important. (016)
3. Access to green areas and wildlife is very important for quality of life. (016)
4. Buffer zones should be implemented in new development, as these edge areas are often as or more important than the woods themselves. (016)
5. Brownfield sites should be considered on an individual basis, not put into one category for future development, as they can be important sites for rare species. (016)
6. Consider building above railway. If they do not own the space this could be an option as trains are quiet and as the location is Town Centre it would add to vitality. It could be mixed use or leisure; leisure would bring people into the town. (017)
7. Woodland, nature reserves, wet land and wild flower meadows should be protected from residential sprawl. (010)
8. Planning permission should be allowed to encourage residents to improve their homes and 'spaces' between homes. (010)
9. Development should be allowed on small, single parcels of land. (002)
10. Stratford and Warwickshire should not be allowed to build up to Redditch's boundaries. (010)
11. Redditch, Feckenham, Astwood Bank and Bromsgrove (Alvechurch, Beoley) should form one 'super town'. (010)
12. The Alexandra Hospital should be enlarged. (010)
13. Olympic sports/ swimming stadiums are needed and should be free. (010)
14. To have a university by 2050. (010)

15. Green Belt should not be built upon. (013)
16. Regional wage structure needs to be looked at to attract highly skilled workers. (019)
17. Housing should have less reliance on fossil fuels. (019)
18. There needs to be more help for people to get on property ladder. (019)
19. Borough needs better signage. (001) (011)
20. There should be a common ground between political parties to ensure proposals will be achieved. (003)
21. Areas needing urban renewal should be targeted, with input from residents. (003)
22. People should be aware and proud of their area. (019)
23. A high technology employment zone (in relation to question 23) could be located at East Moons Moat (Ravensbank). (003)
24. The link to the Sustainable Community Strategy with the themes, objectives and issues is good. (028)
25. The document concentrates on topics rather than strategy. There is a need to consider implications of these options. (028)
26. There appears to be a 'bottom-up' approach, looking to define and identify sites before establishing options for the overall spatial strategy. This is reinforced by a request for additional strategic sites. This may be a result of the way the document is structured and could be addressed as work on the Core Strategy progresses. (028)
27. There are a number of options throughout which relate to the implementation of the Core Strategy which eventually should be in an implementation and monitoring section of the document. (028)
28. It is important to set out clearly the relationship with the adjoining authorities and the need for collaborative working both in the preparation of the Core Strategies and their implementation. (028)
29. Spatial portrait – there are some matters which are important to the character and local distinctiveness of Redditch which are not included in the Spatial Portrait but are referred to elsewhere. In particular the level of open space provision, the tree cover and the road separation give a distinct character to the area. From this fundamental strategy choices could be considered, for example maintaining that character whilst accommodating growth or accepting higher levels of growth by reducing open space levels. It would be important to consult on such options. (028)
30. Due to the revised PPS 12 being published, the new Amendment Regulations and the Phase 2 revisions of the RSS change of dates, the introduction to the consultation document has changed and may affect progress on the Core Strategy. (028)
31. Future development in Redditch Borough could impact upon the Strategic Road Network; therefore this should remain a key determinant when considering options for scale and location of housing and employment land. (027)
32. The needs of the disabled and elderly have not been fully considered. (008)
33. The number of elderly people in Redditch will increase; their needs need to be addressed. (008)
34. The needs of the young are disregarded. There needs to be more parks for children and clubs for young people. (008)
35. It is an important point that young people move away for university and then do not come back to Redditch. (008)
36. There needs to be a link between the Core Strategy and other Local Authority Plans, for example the Sustainable Community Strategy Community Plan, Economic Development Strategy, Housing Strategy and transport plans. (029)
37. Credible district wide and sub district wide affordable housing targets should be set. (029)
38. A local definition of affordable housing should be set encompassing intermediate and social rented housing and taking full account of local relationships between house prices and incomes. (029)
39. The sequential approach should not be so rigidly applied so as to impede the delivery of affordable housing. (029)
40. There should be proper targeting of individual sites for affordable housing, including identifying sites for 100% affordable housing. (029)

41. There should be a reasonable amount of flexibility regarding design and development control standards, densities etc to assist in achieving affordable housing. (029)
42. The provision of affordable housing is recognised as both a positive material planning consideration and a planning benefit. (029)
43. A rural exceptions policy should genuinely enable schemes to be developed in correct locations. (029)
44. The provision of affordable housing should be viewed within the context of achieving a balanced community and within the wider social exclusion and housing plus agendas. (029)
45. Recognition should be given to the advantages of working with RSLs and a suitably flexible approach should be adopted towards S106 agreements. (029)
46. Policies should be included that maximise the reuse of empty properties for affordable housing. (029)
47. Housing demand factors should be taken into account. There is likely to be a continuing demand for family housing and this should be considered. (029)
48. There is little reference made to the housing requirement emerging from the West Midlands Regional Spatial Strategy that cannot be accommodated within Redditch boundaries. The Core Strategy needs to identify the strategy for dealing with this requirement. It is suggested a Joint Core Strategy with Bromsgrove and Stratford should be pursued. (042)
49. It needs to be identified why and how it is the case that Redditch's Green Belt is too sensitive to be amended. The special characteristics of the Green Belt should be detailed to justify extra constraint. The RBC Context to the Core Strategy itself indicates that the Redditch Green Belt is particularly sensitive without identifying how or in what way this is the case. Similarly the Core Strategy doesn't specify the special characteristics of the Redditch Green Belt that justify extra constraint. Redditch Green Belt is in no way different from other green belts. The document identifies that there is no requirement to amend green belt to meet housing requirements in Redditch. This does not accord with the position set out in the WMRSS para 3.65. (042)
50. The documents detail the development pressures threatening the coalescence of Redditch and Astwood Bank. This appears to be the basis for resisting any release of land within the Green Belt; this is unjustified given the WMRSS position and identified housing. Land to the North of Redditch does not need to be retained to prevent merge of Astwood Bank and Redditch. (042)
51. The approach to housing set out is principally based on meeting local needs from the existing population, partially a reflection of the WMRSS policy of concentrating housing growth in areas of deprivation in the region. The approach is likely to generate unmet demand and constrain employment growth. Locations for housing should be made in locations of demand, in accordance with PPS 3. (042)
52. Housing growth in the area is likely to exceed figures in the WMRSS. (042)
53. Sites for housing are likely to require site assembly by the Council or other agencies. (042)
54. In referring to the ADRs only Brockhill is mentioned, this is premature until representations are considered. A consistent approach to the ADRs should be adopted. (042)
55. The document does not set out a strategy for meeting shortfalls in delivery or for addressing significant increases in the WMRSS requirement, there is little leeway in the assumptions made and strategy adopted. There should be provision for additional sites, in accordance with PPS 3. (042)
56. In identifying strategic sites, the document makes no reference to Redditch Town Centre or locations outside Redditch Boundaries that will be required to meet the identified Redditch growth set out in the WMRSS. Reference made to prioritising the reuse of Previously Developed Land and through high densities is not feasible or appropriate to the Redditch context. (042)
57. Land to the north of Redditch should be identified as a strategic location for growth. (042)
58. There should be no requirement for new provision of open space within new housing. (042)
59. The Redditch Development Strategy (issue1) does not mention employment or the economy. Given that Redditch is likely to experience substantive economic growth this should be addressed. (042)

60. Housing requirements are not considered in the context of economic growth or employment requirements. The strategy toward employment land provision fails to take into account housing land requirements that need to be met beyond the boundaries of the Borough. (042)
61. The document proposes potential re-use of employment sites for other uses without having completed an Employment Land Review. Similarly the document implies support for a strategy based on promoting employment clusters and high technology sector development. Redditch is outside the WMRSS defined high technology corridor. (042)
62. The role of Redditch Town Centre as a strategic employment location and the strategy for developing this role are not sufficiently articulated. Similarly the scope for employment uses within the District Centres is not developed in the strategy. (042)
63. District Centres/ Neighbourhood Offices issue. (007)
64. Encourage more shops to local centres. (007)
65. Safer walkways, cycle paths and play areas. (007)
66. Daytime and evening police foot patrols/rounds. (007)
67. Control of heavy lorries on roads near residential areas. (007)
68. New housing issue. (007)
69. More cars and the impact on the environment. (007)
70. Facilities for new residents. (007)
71. Collaboration with schools, involve parents. (007)
72. Raise awareness in schools of issues such as the environment/vandalism etc. (007)
73. Raise awareness of renewable energy - solar panels/recycling etc. (007)
74. More convenient bus routes to major employers Halfords, GKN and Law Society. (007)
75. Open bus routes in rush hour i.e. 7:00 - 9:00 am and 4.30pm - 6:30 pm. (007)
76. Allow lunchtime parking in town multi-storey between 12 noon and 2pm on all levels (including baby/disabled) for workers in their lunch hour. (007)
77. Keep off our parks/more parks. (007) (038)
78. Keep very tall trees lopped or thinned where next to residential housing but do not cut them down. (007)
79. Best move was putting market back onto centre. Worst move was leaving a ghost area. Why not use it as car boot sales/approach local garden centres or businesses to use the area. What about a music feature? (007)
80. There should be more museums in Redditch. (037) (038)
81. Carbon off-setting is not a solution. (040)
82. Energy from waste incinerators should be avoided. (040)
83. Promoting renewable technology and energy efficiency criteria for homes and businesses (which has links to fuel poverty) will create jobs, reduce costs and protect environment. Its win, win, win. (040)
84. Stern Report explains economic reasons for embracing a low-carbon economy as soon as possible. (040)
85. Decentralised energy supplies like District heating schemes. (040)
86. Involve communities in renewable projects. (040)
87. No future without thriving private enterprises and law enforcement. (033)
88. Found consultation difficult. (019) (040)
89. All local people should have a say. (040)
90. Renewable energy targets need to be strong, ambitious and workable and not driven by developers. (040)
91. Despair at planning system. Have witnessed councillors with interests in issues (applications) and decisions leading an agenda detrimental to local people. (040)
92. Would trust a more *transparent and accountable system* allowing communities to be aware of options/issues, make decisions and become involved to make sure vision is fulfilled. (040)
93. Consider the need for a *place of worship* with new housing developments. If there was a church in a new area people wouldn't need to travel. (023) (024)
94. Difficult to fill in. (009) (019)

95. Nothing is mentioned about technology. E.g. we have a broadband cable and TV system. We should seek to ensure that it provides the highest speed broadband "fibre to the home" (see Ofcom discussion documents) to give Redditch a real employment edge. (001)

96. Traffic is getting worse, there have been major accidents, some fatal, and a bypass (Bordesley) is wanted. Can the EU pay for a Bypass? Bromsgrove District Council does not support the bypass. (002)

97. The approach to housing is based on meeting local needs from the existing population, partially a reflection of the WMRSS policy of concentrating housing growth in areas of deprivation. This is likely to generate unmet demand in areas, raising house prices and increasing the need for affordable housing. It is also likely to constrain employment growth if housing is to be used as a tool to generate conditions suitable for regeneration and new economic investment elsewhere. The prospects for additional employment growth in Redditch and the sub region are good and housing provision should be made in locations of demand in accordance with PPS3 para 38, including where economic growth is anticipated. (042)

98. Based on anticipated growth in employment / economic growth in Redditch / Sub region we consider that the housing requirement in the locality is likely to exceed the figures in the WMRSS. There is a significant likelihood that the figures set out in the WMRSS submission draft will be subject to change. The level of increase will depend upon the assumptions made in respect of growth and the approach adopted to meeting that growth. (042)

99. The document proposes to meet the WMRSS identified requirement of 3,300 dwellings largely through use of identified urban capacity including PDL; existing ADR; potential redevelopment including backland development and high density development in Redditch town centre. This is likely to require site assembly by the Council and/or other agencies with some unlikely to be forthcoming within the LDF/RSS period. (042)

100. Greater flexibility in the housing delivery strategy is required in accordance with PPS3 para 52 - 57 & 60 - 61 and PPS12 para 4.46. (042)

101. No consideration of housing requirements in the context of economic growth and employment requirements. The strategy towards employment land provision consequently fails to take into account housing land requirements, particularly in potential locations beyond the built up area of Redditch. (042)

102. It is hard to buy food in Town Centre. (019)

103. There needs to be an Employment Land Review before defining the strategy and policies for employment land provision. (042)

104. The Town Centre is not good for shopping if you are disabled. (050)

105. The Town Centre lacks appeal and is not welcoming, the Kingfisher centre is muddled and uninviting and there is insufficient parking especially for disabled people. (050)

106. The fact that Redditch is unable to accommodate the WMRSS guidelines for employment land, retail space and housing on brown field sites proves that the level of housing it is being asked to accommodate overall is completely incorrect. This unelected body is forcing the Borough to use green field sites which is completely unacceptable. The Local Authority and residents of Redditch should do everything in their power to resist the directions from this unelected body that knows very little about Redditch and seems to ignore representations from people who do. Indeed, the stated aim of the WMRSS is the "...regeneration of urban West Midlands". This should not include relatively new towns like Redditch as the guidelines being used elsewhere clearly do not apply here. As the whole issue is political, it is to be hoped that, now the leadership of the Redditch Council has been transferred out of government hands, the Conservatives will tackle the inequalities and inconsistencies in the WMRSS as a matter of the utmost importance and urgency. (084)

107. Redditch Council must maintain their integrity by honouring all agreements they have made to preserve and maintain areas designated 'for public open space purposes only' and honour their obligations towards hedges and trees, which they have promised to preserve and protect. (083)

108. There should be land set aside for genuine self build houses and self build eco-houses – the 2 are not the same. The land prices need to be set at reasonable costs, and the owners not hit with S106 as they are investing in Redditch! (082)

109. Joint SFRA should inform options to manage and reduce flood risk and inform allocation of potential sites, e.g. how sites will be developed. (093)

110. SFRA should inform policies and assist in local level issues e.g. areas with known flooding problems and rapid run-off could be resolved through the planning process as the mechanism for ensuring betterment and a reduction in flood risk. Therefore improving the flooding situation could be one of the options. Have an overarching policy to require Sustainable urban Drainage Systems (SuDS). (093)

111. Expect an option to ensure sequential testing and phasing of sites based on flood risk e.g. sites are brought forward and developed based on the lowest flood risk first; and appropriate policy to require the use of SuDS; flood risk reduction and enhancement. (093)

112. Water resources are a key issue. Water Cycle Study would assist in determining areas of water supply deficit to inform where growth would be most sustainable and feasible and/or to detail requirements for enabling growth. Include requirement for water efficiency measures in new development and potential for retrofitting of existing development. (093)

113. Water cycle study should demonstrate sewerage treatment capacity to inform allocation of sites and as a development control policy. Where there are capacity problems with local drainage infrastructure, consider a policy for phasing of sites linked to potential supply upgrades. (093)

114. Enhance through creation of new habitat/environmental betterment, in line with PPS9. Require developments having potential impact on habitat to create and restore such habitat and require major development to contribute to on or off site biodiversity projects. (093)

115. Water quality - options to improve water quality and minimise pollution risk could be considered. (093)

116. Contaminated land - this should be taken into account when considering development of brownfield sites? (093)

117. Waste - support options that are in accordance with the proximity principle, waste hierarchy and options for sustainable management of waste. We would encourage options for recycling as part of new development of a particular scale and nature e.g. on site recycling facilities, perhaps as part of a waste audit requirement. (093)

118. Why is Astwood Bank so special, it has lost all of its distinctive characteristics in the last few years? (052)

119. Redditch Borough Council should employ consultants for this exercise (suggestions given). Publish an independent sustainability appraisal for the town and then consult the people again. (052)

120. The Abbey Stadium development should be abandoned. Sporting facilities should be moved to Arrow Valley Park. (052)

121. Crossgates should use pyrolytic refuse disposal to heat new sporting facilities. (052)

122. What are RBC proposing to do in support of remaining needle/spring/ fishing businesses – are they not distinctive to the Town? (052)

123. Support independent food retailers (indoor market?) (052)

124. Consider points from West Midlands Regional Spatial Strategy, Phase Two Revision Sustainability Appraisal.

(i) Recommendation 48 is very important;

(ii) Annex C page 84 RSDF 3.5, increase access to good quality and open green space within 300 metres of homes;

(iii) Annex G 9.2 & Table G 9.1 more woodland is required to ensure that everyone will be within 500 metres of woodland of 2 hectares or more in size;

(iv) Annex C page 82 C RSDF 3.3 minimise light pollution. (080)

125. Map of pathways in Redditch to be made available to all – on RBC website and/or in libraries. Likewise for bus routes and bus station information. (081)

126. Please answer my question on traveller site charges. (Q41 URN 081).

127. Love living here – keep up the good work. (081)

128. It's important that there remains in place a telecommunications policy. PPG8 provides clear guidance as to the main issues surrounding telecommunications development and what should be included in a local plan (now LDD). Recognise that this is likely in a development control DPD rather than Core Strategy. (086)

129. Webheath ADR should only be released for development if foul drainage and highway restrictions were solved (as decided at Inquiry). (041)

130. There is an identity between Redditch and Arrow Valley. (041)

131. Negative and limits for developing the western areas, curtail sewers of the Arrow Valley Development. (041)

132. Western areas need social housing. (041)

133. Potential vacant crown land to be used. (041)

134. Employ more staff travelling around the Borough to keep an eye on and ensure planning applications, agreements and law is complied with. Not just one man on his own around the whole Borough, he doesn't stand a chance at all. (097)

135. It is a pity this document was so late in being circulated. More considered answers might have been made had time permitted. (097)

136. Feel most strongly at the Town's lack of leisure/swimming pool facilities. It is shocking that a town of this size and with a young population that we can only offer them the choice between the 2 swimming pools that we currently have. (095)

137. Do not believe targets will be met for renewable energy in the times allowed. This will be a very long term ideal. (036)

138. Local Centres have suffered because there is little for the youth to do. (003)

139. Road system is good but needs improvement such as landscaping the islands. (003)

140. District Centres need improvement. Locals should be involved. (003)

141. Arrow Valley Park is brilliant, keep it natural. (003)

142. Lack of recognition in the consultation document of the need to work closely with the *adjoining authorities* of Bromsgrove and Stratford, which will be needed following RSS Phase Two Revision. A joint core strategy is not necessarily advocated however it is appropriate to put mechanisms in place for joint working to ensure future housing and employment provision are delivered in the most effective way. This goes to the heart of spatial planning (Quote given from PPS 12). Little reference to the housing requirement emerging from the West Midlands Regional Spatial Strategy that cannot be met within the Redditch Borough boundaries. Identify these requirements and set out the Council's strategy for addressing these requirements (jointly) in accordance with PPS12 paragraphs 4.1 - 4.5 and PPS3 Para 32 - 35 & 37 - 39. Joint approach with Bromsgrove and Stratford Districts should be pursued. (031) (042)

Officers Response to comment(s)

1. The Borough has a range of SSSIs, SWSs and LNRs. These sites have special protection due to their quality of Biodiversity.
2. As part of a new development over a certain size, a portion of open space is required, these open spaces can include play areas.
3. As above, open space is required as part of any new development, in terms of established development, access with regard to public transport is not an issue for the Core Strategy to deal with.
4. This comment/ approach could be incorporated into the Preferred Draft Core Strategy.
5. National planning policy states that Brownfield sites should be the priority, in order to reduce the Greenfield sites that may be used. However, each site is subject to a planning application which follows the normal procedure of site assessments.
6. Officers assume this to mean the Edward Street site, adjacent to the railway. This site is currently subject to a specific SPD, guiding any future development. As well as this, this site may potentially be a strategic site in the Core Strategy, as it is considered that the development of this site will contribute to the vitality of the Town Centre.
7. Redditch has a number of SSSIs, LNRs and SWSs, these areas have special protection afforded to them to prevent the encroachment of development.
8. The Core Strategy is a strategic planning document, intended to set out how Redditch should be by 2026 and how this will be achieved. Individual planning permissions are too specific to be incorporated within the Core Strategy. With regard to household development this may be more appropriate to be contained within a 'Development Control DPD'.
9. An Employment Land Review and SHLAA are currently being conducted by the Borough Council. These studies will consider which sites in Redditch Borough are appropriate for development. If an area of land is subject to a planning application, it will be assessed on its own merits. Any planning application must be in conformity with the 'Development Plan' for permission to be received. This is not a matter for the Core.

10. The West Midlands Regional Spatial Strategy Phase II Revision currently states that 3,300 dwellings related to Redditch growth should be accommodated within the administrative boundaries of Stratford and/ Bromsgrove, to adjoin Redditch. The most appropriate location for this growth is currently being assessed by a study carried out by the three authorities. Therefore any growth adjoining Redditch, located in Warwickshire, will be to meet Redditch related growth.
11. This is not an appropriate approach to incorporate in the Core Strategy as this is unsustainable; also, Bromsgrove is not within the administrative boundaries of Redditch Borough and therefore this is not a matter for the Core Strategy.
12. Officers consider that the Alexandra Hospital may be designated as a strategic site within the Preferred Draft Core Strategy; therefore land within the curtilage of the Alexandra Hospital will be protected for health related purposes.
13. The cost of leisure facilities in Redditch Borough is not an issue for the Core Strategy. However, Officers consider that, due to a national government programme, swimming is expected to be free to all in the near future. In terms of building new facilities, it is anticipated that redevelopment of the Abbey Stadium is expected in the near future, contributing the stock of sports facilities provided in Redditch Borough.
14. There are a wide range of universities within close proximity to Redditch Borough. Redditch Boroughs population (approximately 90,000) is not appropriate to support a university facility; in any case, the establishment of a university is not a matter for the Core Strategy to progress.
15. The Green Belt within Redditch Borough is designated as such under PPG 2 'Green Belts', there has been no alteration to national planning policy which would alter the designation of this land. The Redditch Green Belt has also been subject to a study which considers the sensitivity of the Green Belt.
16. The wage structure of the region is not an issue for the Core Strategy.
17. The Code for Sustainable Homes is a national standard of assessing the sustainability of new homes. One of the main features of the code is to reduce the reliance that new dwellings have on fossil fuels, by requiring all new homes built are zero carbon by 2016. National requirements are also that every new home receives a portion of its energy from renewable resources. These standards will be reflected in the Preferred Draft Core Strategy.
18. The West Midlands Regional Spatial Strategy phase II Revision will stipulate how many homes will need to be built in Redditch by 2026. This will increase the availability of housing within the Borough; however in terms of first time buyers and the help they can receive buying a first property, this is not an issue for the core strategy.
19. Section 106 monies can be collected from new developments which can contribute towards improving signage around the Borough.
20. Planning Advisory Panel is a group of Members representing the range of political parties in Redditch Borough, Planning Advisory Panel are regularly involved in the progress of the Core Strategy and contribute to its development.
21. This was presented as an option in the Issues and Options Document for Question 4 option 2.
22. Consultation is carried out throughout the preparation of the core strategy, the intention of this is to increase awareness of the document and encourage the public to contribute to a plan which will influence the future development of the borough.
23. The area of Ravensbank is not within the administrative boundaries of Redditch Borough and therefore is not a matter for this Core Strategy to progress.
24. Officers note the comment
25. Each option presented in the Issues and Options Document is subject to a Sustainability Appraisal, this considers the implications of each option. With regard to the approach, Officers consider it appropriate to consider and consult on the key issues to be dealt with through the emerging Core Strategy. Following this, the development of the Preferred Draft Core Strategy will progress, transforming these issues and appropriate approaches into a strategy.

26. Each option presented in the Issues and Options Document is subject to a Sustainability Appraisal, this considers the implications of each option. With regard to the approach, Officers consider it appropriate to consider and consult on the key issues to be dealt with through the emerging Core Strategy. Following this, the development of the Preferred Draft Core Strategy will progress, transforming these issues and appropriate approaches into a strategy.

27. Officers consider that any form of monitoring or implementing will be contained within the Delivery Framework, which will accompany the Core Strategy.

28. With regard to the Core Strategy, each adjoining authority is preparing their core strategy for their administrative boundaries. In terms of collaborative working, regular meetings and updates occur between the three authorities.

29. Officers consider these aspects of the spatial vision have been adequately consulted on. They are mentioned elsewhere in the document as they are important characteristics to Redditch and fundamental when considering the appropriate option in relation to the issue.

30. The publication of PPS 12, the amendment regulation and Phase II will be incorporated into the development of the Core Strategy. The Core Strategy is flexible enough to have regard for these updates and additions.

31. The road network is one of the considerations when developing options in terms of the strategic sites.

32. One of the key objectives of the Core Strategy, included in the Issues and Options document is “to have sufficient homes, meeting demographic needs” this objective relates to providing housing for an aging population. Officers’ consider that in relation to the need of the disabled and elderly, there were no other appropriate issues that the Core Strategy at this stage could present. This does not preclude the provision or incorporation of the needs of the disabled or elderly being included in future core strategy preparation.

33. One of the key objectives of the Core Strategy, included in the Issues and Options document is “to have sufficient homes, meeting demographic needs” this objective relates to providing housing for an aging population. Officers’ consider that in relation to the need of the disabled and elderly, there were no other appropriate issues that the Core Strategy at this stage could present. This does not preclude the provision or incorporation of the needs of the disabled or elderly being included in future core strategy preparation.

34. During preparation for the Core Strategy, consultation is carried out which seeks to involve all sections of the community, for example exhibitions have been carried out in locations that are accessible and visited by young people. With regard to the amount of parks, it is considered that Redditch currently has an above average proportion of open space per 1000 population and this is considered under Issue 22 of the Issues and Options Document. Clubs for young people are a function outside of the control of the Core Strategy.

35. This occurs in a number of areas nationally and is out of the control of the Core Strategy.

36. These documents have informed the preparation of the Core Strategy and will continue to do so. As well as using these documents as background documents to inform the preparation of the Core Strategy, the Housing Strategy has been assessed during a document review to inform the Sustainability Appraisal.

37. A district wide affordable housing target has been set, informed by the Housing Needs Assessment and the South Housing Market Assessment. These documents are regularly updated and it is considered by officers the affordable housing target must be updated to reflect these documents, this will be considered through the preparation of the Core Strategy.

38. A definition of affordable housing was provided in the glossary of the Issues and Options Document; this definition included reference to intermediate and socially rented housing.

39. It is considered by Officers the sequential approach stipulation through the Development Strategy does not impede the delivery of affordable housing.

40. Identifying a site for any form of housing would need to be accomplished through a suite of specific development plan documents; this cannot be achieved through a core strategy.

41. Officers consider that any requirements suggested through the Core Strategy will be based on a credible and robust evidence base, in order to achieve sustainable communities. Any design or development standards required through the core strategy will not preclude the delivery of affordable housing.

42. Officers note the comment

43. A rural exceptions policy is a suggested approach that could be used in the preparation of the Core Strategy.

44. Officers note the comment

45. Redditch Borough Council successfully works with RSLs in order to deliver affordable housing. There is a S106 agreement already established which allow this function to take place.

46. Although this notion is supported and encouraged in Redditch Borough, it is not strictly a Core Strategy matter.

47. Housing demand and need are identified through the Housing Needs Assessment and the South Housing Market Area Assessment, these documents are used to inform the preparation of the Core Strategy, and as such may be reflected in future policies.

48. The West Midlands Regional Spatial Strategy Phase II Revision currently states that 3,300 dwellings related to Redditch growth should be accommodated within the administrative boundaries of Stratford and/ Bromsgrove, to adjoin Redditch. The most appropriate location for this growth is currently being assessed by a study carried out by the three authorities. Therefore any growth adjoining Redditch, located in Warwickshire, will be to meet Redditch related growth.

49. The Green Belt within Redditch Borough is designated as such under PPG 2 'Green Belts', there has been no alteration to national planning policy which would alter the designation of this land. The Redditch Green Belt has also been subject to a study which considers the sensitivity of the Green Belt.

50. It is the Borough Councils position that the release of Green Belt land for development is informed by a number of factors, and not merely the coalescence of settlements. A study has been carried out by the Council which considers the suitability of a range of sites within the Green Belt of Redditch in relation to their appropriateness for development and more specifically in relation to meeting the development requirements set by the WMRSS. The land to the South West and expansion of Astwood Bank into the Green Belt are recommended as being the most inappropriate locations for future development. Although it is agreed the release of Green Belt land to the North of Redditch bears no relation to the coalescence of settlements issue, there needs to be consideration for the recommendations of the Green Belt study for this area to the North of Redditch.

51. The approach to housing in the Issues and Options Document presents the target set by the WMRSS, which reflects the natural growth of Redditch Borough. Locations for housing in Redditch Borough will be considered in relation to their sustainability and will be in accordance with all national and regional planning policy, including PPS 3.

52. The approach to housing in the Issues and Options Document presents the target set by the WMRSS, which reflects the natural growth of Redditch Borough. Locations for housing in Redditch Borough will be considered in relation to their sustainability and will be in accordance with all national and regional planning policy, including PPS 3.

53. Officers note the comment

54. Officers consider that the three ADRs of Redditch are referred to.

55. This kind of detail is not applicable for an Issues and Options Document and will be contained within the Core Strategy in due course.

56. The whole of the Town Centre is not considered appropriate as a strategic site because much of it is developed; there are no likely pressures for development and therefore it would be misleading to suggest that anything will be delivered on the whole site. There is however a suggested strategic site within the Town Centre (Church Road, Town Centre). With regard to locations outside of the Borough boundary it is not appropriate for strategic sites to be considered within the Core Strategy, which relates simply to Redditch Borough. Establishing a proportion of new development on Previously Developed Land and at a variety of densities appropriate to the Borough is considered a necessary part of the Core Strategy, as advocated by the WMRSS.

57. With regard to land to the North of Redditch, the Core Strategy can only identify strategic sites within the administrative boundary of the Borough. Brockhill ADR was presented in the Issues and Options Document as a strategic site; this is likely to continue throughout the process of developing the Core Strategy. If this commenting is suggesting any other location, it is not specific enough in terms of a strategic site to be carried forward through the Core Strategy.
58. Officers consider this approach to be contrary to national planning policy in particular PPG17.
59. The Development Strategy encompasses all development; it does not isolate one specific form of development.
60. The Preferred Draft Core Strategy seeks to balance employment and housing by restricting B8 uses. B8 uses with a high land take needs to be limited because the number of jobs created needs to relate to the anticipated economic active population. If there is a high proportion of B8 development in relation to other industry types, there is a risk that there will not be enough jobs and this is considered to be unsustainable.
61. An employment land review is being conducted by the Borough Council which will propose employment sites. Officers are aware that Redditch is located outside the HTC, however the Issues and Options Documents considered Redditch can tap into this resource (Issue 17).
62. Redditch's role, a Settlement of Significant Development will, where necessary, be considered. Reference is made to Policy PA6A 'Employment Land Provision' in the WMRSS Phase Two Draft Preferred Option (December 2007), which states "Local Planning Authorities should make provision for a continuing five year reservoir of readily available employment land outside Town Centres". The approach to the redevelopment of District Centres will be presented in the Core Strategy.
63. This comment does not suggest any approach or issue for the Core Strategy.
64. The district centres are the second tier in the suggested hierarchy of centres, this means they are the most sustainable and preferable locations to develop major retail development, this is outlined in the Issues and Options Document, and if carried forward will be included within the Core Strategy.
65. The 'Designing for Community Safety' SPD guides the appropriate features of safe areas.
66. Action by the police is not a spatial planning matter. Consultation with the Crime Risk Manager takes place for the preparation of LDF and for individual applications where appropriate.
67. This is not a matter for the Core Strategy.
68. This is not suggesting a specific issue or matter for the Core Strategy. The need for new housing will be covered through the development of the Core Strategy.
69. The issue of transport will be covered by the Core Strategy.
70. This is not suggesting a specific issue or matter for the Core Strategy.
71. This is not suggesting a specific issue or matter for the Core Strategy.
72. This is not an issue to be dealt with through the Core Strategy; however Officers consider that schools will be consulted in the development of the Core Strategy.
73. This is not a matter to be dealt with by the core strategy; however it is likely the use of renewable energy will be covered by the Core Strategy.
74. Busses are a commercial service and the routes are dictated by those who run this service. However encouraging sustainable modes of transport is an issue for the Core Strategy and encouraging bus routes to major employers is desirable to archive this objective.
75. The opening up of the bus routes was suggested as an issue in the Issues and Options Document (Question 46) however the restricted suggested could be carried forward through the Core Strategy.
76. Car parking within town centre multi storeys is controlled by the owner of the Kingfisher centre, which the planning department cannot control. However Offices consider the current arrangements do not preclude workers parking in their lunch hour.
77. The parks in Redditch Borough are classified as open space; any future development of open space land will be assessed through the open space needs assessment, an Employment Land Review and the SHLAA.
78. This is not a spatial planning matter.
79. The use of this land is being considered by the Council.

80. Redditch is currently served by the Forge Mill museum, there is no demand for an additional museum, however if this were the case this would not be precluded.
81. Officers consider the most sustainable approach is energy conservation, however when circumstances arise where this is not feasible it is appropriate to provide alternative options to work towards sustainability. Carbon offsetting is provided as an option to question 10, however this would only be provided as an option as a last resort where other options such as energy conservation are not feasible.
82. Energy form waste incinerators have not been provided as an option in the Issues and Options Document.
83. Officers note the comment
84. Officers note the comment
85. This is not providing an issue or matter for the Core Strategy to deal with.
86. Officers consider this comment to mean in large scale renewables energy production schemes. The Core Strategy will not establish or locate renewable energy schemes, their implementation will be carried out outside the Core Strategy process.
87. Economic growth and employment are features of the Core Strategy including the vision and as a key objective.
88. Consultation is carried out throughout the preparation of the core strategy, the intention of this is to increase awareness of the document and encourage the public to contribute to a plan which will influence the future development of the borough.
89. Consultation is carried out throughout the preparation of the core strategy, the intention of this is to increase awareness of the document and encourage the public to contribute to a plan which will influence the future development of the borough.
90. Renewable energy targets will be driven by national guidance and the need for Redditch Borough to be as sustainable as possible.
91. This is not providing an issue or matter for the Core Strategy to deal with.
92. Consultation is carried out throughout the preparation of the core strategy, the intention of this is to increase awareness of the document and encourage the public to contribute to a plan which will influence the future development of the borough.
93. The establishment of a place of worship is not an issue for the Core Strategy. With regard to new developments the Core Strategy cannot require the establishment of a place of worship.
94. Officers note the comment
95. Broadband was provided as an option is question 8; however the speed of broadband is not an issue for the Core Strategy, or indeed planning.
96. Transport is a key theme in the Issues and Options Document under 'Stronger communities'. The need for the Bordesley Bypass will be triggered by any development at the Abbey Stadium, the delivery of this and potential funding sources will be established when the need for it arises.
97. Officers note the comment
98. The growth of housing and employment are set by the West Midlands Regional Spatial Strategy, since the publication hat Redditch will need to provide 6,00 dwellings up to 2026, a second study has been carried out, which may say that Redditch will need to account for more growth. In any case the amount of growth is a debate at Regional level and will not be decided through the Core Strategy.
99. The detail of the delivery of strategic sites will be considered through the Delivery Framework.
100. The approaches to delivery by national planning guidance have been and will continue to be taken into account during the preparation of the Core Strategy.
101. The growth of housing and employment are set by the West Midlands Regional Spatial Strategy, since the publication hat Redditch will need to provide 6,00 dwellings up to 2026, a second study has been carried out, which may say that Redditch will need to account for more growth. In any case the amount of growth is a debate at Regional level and will not be decided through the Core Strategy.

102. The Borough Council have commissioned a Retail and Leisure Needs Assessment which will investigate the supply of convenience retail in the Borough and recommend a target floorspace for new provision. The Core Strategy will then consider how to accommodate this target in the most sustainable locations.

103. An employment land review is being conducted by the Borough Council which will propose employment sites.

104. Officers consider that Redditch Town Centre is accessible for those with a disability. The Kingfisher Shopping Centre is very accessible. Individual stores however, would need to ensure they make appropriate provision for those with a disability.

105. The Kingfisher Centre is under private ownership and therefore the layout and type of shops provided cannot be controlled by the planning department. Officers consider there is sufficient parking within Redditch Town Centre.

106. Irrespective of the capacity to accommodate the WMRSS development requirements on brownfield land, the requirements are there to meet the needs of the population of Redditch and therefore must be accommodated. The use of greenfield sites, although not preferable, is inevitable. Reference to the unelected nature of the WMRA is not a planning matter. The regeneration aims for the major urban areas of the West Midlands, as set out in the WMRSS, would not be applicable to Redditch; however the WMRSS provides sufficient guidance on the future role and function of Redditch as an SSD. Political matters are not a matter for the Core Strategy.

107. The open space needs assessment will direct whether the quality of some of the open spaces is worth maintaining, if not, the Employment Land Review and SHLAA will determine whether these areas are more appropriately used for development. The trees within Redditch Borough have already been considered as a distinctive feature of the Borough and therefore worthy to retain.

108. There can be no distinction between the approaches taken to house building in Redditch. The price of land within the Borough is a result of market forces and cannot be controlled by the planning department. Section 106 agreements are used where deemed appropriate in order to ensure the new development contributes to the local community or infrastructure.

109. Officers note the comment

110. The suggestion to have a policy relating to the use of SUDS is an approach that could be carried forward into the development of the Core Strategy.

111. The risk of flooding is taken into account when considering sites for development through the employment land review and SHLAA.

112. The water cycle strategy is being carried out as part of SFRA. The requirement for water efficiency measures in new homes will be part of the Code for Sustainable Homes. In terms of retrofitting existing housing, this is not a matter for the Core Strategy

113. The water cycle strategy is being carried out as part of SFRA.

114. Any new development will need to consider its impact on the natural environment; this is a matter at the planning application stage.

115. This suggestion may be continued as part of a broader policy through the core strategy.

116. As part of the planning application process, any contaminated land would need to be rectified before development could commence.

117. Providing facilities for recycling as part of new development is one of the requirements within the Code for Sustainable Homes. This requirement will also inform one of the policies within the Core Strategy.

118. Astwood Bank is considered as a sustainable settlement.

119. Officers note the comment

120. The development of the Abbey Stadium is considered as necessary to ensure adequate sporting facilities are provided within Redditch Borough. It is not the control of the Core Strategy to dictate the movement of sporting facilities from one location to another; also the Core Strategy would not preclude sporting facilities at the Arrow Valley Park.

121. Decentralised energy systems are a sustainable use of energy resources, and their principle would be in accordance with local and national policy, however specific projects are out of the remit of the Core Strategy.

122. All businesses will be supported by relevant Core Strategy policies.

123. Nothing would preclude the development of independent food retailers.

124. These documents have informed the preparation of the Core Strategy and will continue to do so. As well as using these documents as background documents to inform the preparation of the Core Strategy, the Housing Strategy has been assessed during a document review to inform the Sustainability Appraisal.

125. It is unfeasible to produce a map with every pathway noted on it. Bus route information would be provided by the commercial operator.

126. This comment is answered under Question 41 Option 5.

127. Officers note the comment

128. It is considered that any Telecommunications policy would be best suited to be contained within a Development Control DPD rather than a Core Strategy.

129. The alternative approaches for this parcel of land will be presented in the Preferred Draft Core Strategy; however relevant infrastructure improvements will be considered essential towards the delivery of any strategic site.

130. Officers note the comment

131. The alternative approaches for this parcel of land will be presented in the Preferred Draft Core Strategy; however relevant infrastructure improvements will be considered essential towards the delivery of any strategic site.

132. A proportion of affordable housing is required as part of new developments over 15 dwellings, this information is contained within a Supplementary Planning Document 'Provision of Affordable Housing', this requirement is for new development in the whole of Redditch Borough.

133. The appropriateness of various sites of land for development, regardless of ownership, is being considered through a Strategic Housing Land Availability Assessment and Employment Land Review.

134. The amount of Enforcement Officers employed by the Borough Council is not a matter for the Core Strategy.

135. The proposed consultation dates for the Issues and Options Document has been scheduled within the Local Development Scheme before 2005. This document has been publicly available since then. The document was on consultation for six weeks.

136. It is anticipated that redevelopment of the Abbey Stadium is expected in the near future, contributing to the stock of sports facilities provided in Redditch Borough.

137. There is now a national target to ensure all home are zero carbon by 2016 with an equivalent standard for non-domestic buildings. The Core Strategy will be in conformity with this.

138. Officers consider that in any redevelopment proposals for the Borough's District Centres, provision for younger generations would be a consideration.

139. Although the principle is agreed, landscaping is not a spatial planning matter.

140. Public consultation on any proposals to redevelop the District Centres would be conducted in line with the Borough Councils Statement of Community Involvement.

141. Officers note the comment

142. The need to work with adjoining authorities (including Bromsgrove and Stratford) is a process that is established. It is considered that joint working is essential during production of each District's Core Strategy and this continues. As a whole the three Core Strategies will deal with the implications of the requirements of the WMRSS.

Action to be taken with comment

23. Consider carrying forward the idea of locating a high technology employment zone (in relation to question 23), which could be located at East Moons Moat (Ravensbank).

43. Consider carrying forward the idea of a rural exceptions policy.

75. Consider the restriction of bus routes in rush hour i.e. 7:00 - 9:00 am and 4.30pm - 6:30 pm (through passing the comment to Worcestershire County Highways Dept.)

111. Consider carrying forward the suggestion to have a policy relating to the use of SUDS.

115. Water quality - options to improve water quality and minimise pollution risk could be considered as part of a broader policy through the core strategy.

Part 2

Summary of Representations to West Midlands Regional Assembly and Worcestershire County Council

URN of Consultees

West Midlands Regional Assembly (URN 021)

1. Under Issue 12, Landscape and Townscape, the opportunity should be taken to pursue Policy QE6 of the RSS in the Core Strategy.
2. The Core Strategy should implement Policy QE7 in order to contribute to meeting strategic objective 2 in the Issues and Options Document.
3. Policy QE9 of RSS expects DPD Policies to play its part in addressing a series of water related matters; the Core Strategy should reflect this.
4. The following are in general conformity with the RSS:
 - Vision and Objectives
 - Spatial Policies
 - Issue 1 Q4 / Q5 / Q6
 - Issue 3 Strategic sites
 - Issue 4 Q8
 - Issue 5 Q9
 - Issue 6 Q10
 - Issue 8 Q 12
 - Issue 10 Q 14
 - Issue 12 Q16
 - Issue 13 Q 17
 - Issue 16 Q 22
 - Issue 18 Q 25
 - Issue 18 Q 26
 - Issue 19 Q 27
 - Issue 20 Q 28
 - Issue 21 Q 29
 - Issue 27 Q37
 - Issue 27 Q 40
 - Issue 29 Q 43
 - Issue 30 Q 47
5. Q7 - Does not currently raise any conformity issues, however it may do at a later stage depending on whether, and which, proposed additional strategic sites that Redditch are intending to include in the emerging Core Strategy in response to this question.
6. Issue 7 Q11 - Option 1 and 2 are an acceptable approach in relation to conforming to the RSS.
7. Issue 11 Q15 - The amount of employment land that may be appropriate on ADRs should not prejudice their capacity to contribute to the RSS housing provision for Redditch Borough as set out in the RSS Preferred Option.
8. Issue 14 Q18 - If this topic is pursued in the Core Strategy, be mindful of emerging RSS Policy CF6 Making Efficient Use of Land, in consideration of the appropriate locations for tall buildings. Pursuing an Option that would permit the location of tall buildings other than within and close to Redditch Town Centre or close to public transport interchanges would be likely to fall foul of Policy CF6.
9. Issue 15 Q19 - To ensure conformity with the RSS, the preferred option for the locations of employment growth must accord with policies in the RSS including those which seek to protect the environment, as indicated in paragraph 7.30. In this context, it is unlikely that in particular Option 1, to locate employment adjacent to new residential development in all circumstances, would be in line with the emerging RSS.
10. Issue 15 Q 20 - RSS Policy PA6A indicates that the employment land requirements are indicative and subject to testing in Core Strategies, this is an appropriate question to ask in relation to RSS conformity.

11. Issue 15 Q 21 - Option 1, identifying small to medium sized locations for employment growth based on market forces, would not, as a freestanding Option, if pursued result in a portfolio of employment land and premises being provided in line with emerging RSS Policy PA6.
12. Should Option 2 be pursued, namely to rely on an Employment Land Review to identify the most appropriate approach, this review should ensure that a portfolio of employment land is identified as well as the quantum of land required for Redditch in order to accord with emerging RSS Policy PA6.
13. Issue 17 Q 23 - Whilst the Options presented generally conform to the RSS, the Core Strategy should not promote the inclusion of Redditch within the High Technology Corridor. Option 3 could be interpreted as seeking to achieve this.
14. Issue 17 Q 24 - No conformity issues. Should there be greater support for economic clusters in the Core Strategy, it would be in line with Policy PA4.
15. Issue 22 Q 30 - Should Options 2, 3 or 4 be pursued, ensure that the approach taken to identifying possible areas of open space for development generally conforms to RSS Policies on the Quality of the Environment (QE4 and QE7) and also parts B and C (vi) of Policy SR1 Climate Change.
16. Issue 23 Q 31 - A local target as per Option 1 and 2 can be set, however whilst Option 3 would be expected to maximise the re-use of land and building for housing, brownfield sites must be in sustainable locations to accord with Part A of Policy CF5 and paragraph 6.37 of the RSS Preferred Option. Option 3 would be likely to fall foul of the RSS approach for employment land provision in respect of protecting the most important and versatile employment sites from development for housing as indicated in paragraph 6.39 of the RSS Phase 2 Preferred Option and as set out in Policy PA6B.
17. Issue 24 Q 33 - RSS paragraph 6.36 allows LDDs to consider whether special policy protection is needed in relation to gardens. With regard to Option 1, the RSS at paragraph 6.36 does not say that development on back gardens should be restricted where there is evidence of its impacts on the locality as suggested in the Option.
18. Issue 25 Q 34 - RSS Policy CF6 allows Redditch to set out density polices specific to their area to reflect local circumstances and the findings of the housing market assessment. The Options presented are generally in line with this Policy, however be mindful of the need to provide a mix of housing types, sizes and tenures in deciding on local housing densities (RSS para 6.41 and Policies SR2A and CF8) as housing density can often influence the size and type of dwellings that can be accommodated.
19. Issue 26 Q 35 - Whatever approach is taken in the Core Strategy it should generally accord with RSS Policy CF10 Managing Housing Land Supply.
20. Issue 27 Q 36 - In considering the importance of trees, Redditch should be mindful of RSS Policy QE4 Greenery, Urban Greenspace and Public Spaces where emphasis is placed on developing appropriate strategies for green space with an emphasis on, among other things, increasing the overall stock of urban trees.
21. Issue 27 Q 38 / Q 39 - Be mindful that any changes contemplated to the road hierarchy/separation of roads and footpaths of Redditch on local distinctiveness grounds could impact on highways and transportation considerations and that account should therefore be taken of RSS Chapter 9 Transport and Accessibility and in particular Policy T9/ Policy T3 Walking and cycling.
22. Issue 28 Q 41 - Should Option 3 be pursued it would have to accord with RSS Policy PA6B, Protection of Employment Land and Premises. Whichever Option is pursued it should accord with Policy CF9 which states that "Development plans should ensure that adequate provision is made for suitable sites to accommodate gypsies and travellers. Such provision should reflect the order of demand in the area as indicated by the trends shown by the ODPM annual count and any additional local information."
23. Issue 29 Q 42 - Options 1 and 4 would not be in line with emerging RSS Policy T4 which requires transport assessments and travel plans only for planning applications involving significant travel demands and not regardless of size.

24. Issue 29 Q 44 - Should Option 2 be preferred it should reflect RSS Policy T3 Walking and Cycling. Should Option 3 be preferred it should reflect RSS Policy T4 Promoting Travel Awareness. Should Option 5 be preferred it should take into account Policy T7 Car Parking Standards and Management. Should Option 6 or Option 7 be preferred they should reflect Policy T8 Demand Management.

25. Issue 29 Q 45 - Option 1 would not be in line with part c iii) of emerging RSS Policy T5 which seeks the introduction of bus lanes and priority measures including re-allocating road space where necessary.

26. Issue 29 Q 46 - The approach to this issue should take account of Policy T3 Walking and Cycling.

URN of Consultees

Worcestershire County Council (URN 049)

27. The spatial portrait would benefit from greater recognition of the importance of biodiversity/natural environment in its own right in relation to the economy, housing, health, culture and leisure, with reference to the Borough's natural environment resource, under the profile section of the spatial portrait.

28. Issue 5 creating safe and secure environments - The issue may largely be seen as an issue of the design of spaces and should be consulted with West Mercia Constabulary. RSS Policy SR2C recognises the need for "safe and secure developments"; however development of such policies should be seen in context of the threat to Redditch. The key relevant strategic objective is identified as *"Reducing crime and anti social behaviour and the fear of crime"*. Expand options to allow for elements that include passive surveillance from urban design and be integrated with Issue 8 (Standards of Development) in line with CABE 'Building for life standards' (RSS Policy SR1C ii). Enhancing the permeability of places is equally a justifiable objective that the Preferred Option may wish to promote.

29. Key Theme B – A better environment for today and tomorrow - Biodiversity issues are not adequately addressed in this document.

30. Issue 6 - The Conflict between the Environment and Climate Change - This issue is introduced in a negative manner; in reality the two issues of adapting to climate change and safeguarding the environment are one and the same, with positive interventions that could benefit both and in many cases enable a win-win situation.

31. Issue 6 - The Conflict between the Environment and Climate Change - The paragraph on page 34 gives quite a negative portrayal of renewable energy. In drafting the Preferred Option, supporting text should seek to better fit the ethos of PPS22 and PPS1 (example of text given).

32. Issue 6 - The Conflict between the Environment and Climate Change - Refer to the potential benefits that may arise as a result of climate change, which may benefit Redditch including business opportunities in environmental technologies market.

33. Issue 6 - The Conflict between the Environment and Climate Change - The purpose of the diagram on p.34 and the appropriateness of source are questioned.

34. Q.10 how can we ensure renewable energy production without compromising environmental quality? - Option 1 is arguably not a valid Option as it is already required though PPS22.

35. Q.10 how can we ensure renewable energy production without compromising environmental quality? - Option 3 is not appropriate and presents a negative stance towards on-site renewables. PPS22 states there should be positively expressed policies.

36. Policy Options make no allowance for off-site generation for developments before making provision for carbon off-setting. Option 4 would require a clear set of criteria to be assessed against before developers are unable to deliver onsite generation, who would operate and monitor a carbon off setting scheme?

37. Q11 - What proportion of renewable energy should be required from all new development? - The policy options should be aware of RSS Phase Three revision. The options will also need to be integrated with the policy options in Issue 6. The policy options should also be aware of current discussions between UKGBC and Government on definitions of Zero Carbon and allowing off site generation. The issue states all development, is this to include both domestic and non-domestic? If so, the policy should be aware of the current consultation on achieving zero carbon in non-domestic buildings.

38. There may be some clarification required over the use of the words “all development” in question 11, as it is likely that there will be many buildings and structures which constitute “development”, but where the provision of renewable energy is not a practical possibility.

39. Option 2 – A requirement for 20% is ambitious, although will need to be backed up by justification as to why Redditch are setting such a target when the national target in PPS 1 is for 10%.

40. References on page 37 to the Code for Sustainable Homes and BREEAM standards ideally need to be strengthened. It is not enough merely to judge the buildings against the code/standards; this in itself is unlikely to deliver significant improvement. The Issues & Options document states “Using this mechanism in Redditch Borough ensures that our buildings are as environmentally friendly as possible”. This will only be the case if Redditch actually demands a certain level of the Code/BREEAM to be met – as drafted it may suggest that merely assessing the buildings is sufficient.

41. Issue 8 Standards of Development - The Policy Options go beyond the RSS and should be mindful of current consultations surrounding zero carbon homes. Option 4 goes beyond the RSS Policy SR3G and could perhaps stifle investment in the Borough. Creating standards of development that are adaptable to future climate change should include elements other than those outlined in BREEAM and Code for Sustainable Homes. This should include designing to CABE standards as per RSS Policy SR3B. Consideration should also be given for issues such as Solar Orientation and Solar Shading as outlined in the Worcestershire County Council Draft Planning for Climate Change – Technical Guidance Paper.

42. Q12 - What should Redditch Borough request in terms of a feasible level / standards for all new development to meet? - The most ambitious Code Option here, level 4, falls some way short of achieving the Strategic Objective of carbon-neutral development. Similarly, the highest BREEAM rating Option is ‘very good’, when the Strategic Objective seems to call for ‘excellent’.

43. Add a requirement for all development to illustrate that the impacts of landscape character and biodiversity have been taken into account and appropriate mitigation works applied.

44. New schools, where required, will be built to DCSF standards current at the time of build and the County Council will seek to include eco-friendly features in their construction where possible.

45. Everywhere needs B2 industry. Not all development is high-tech and that between them the EHO and Environment Agency should ensure that nuisance and pollution are reduced to acceptable levels. Most waste management facilities now resemble manufacturing units and take place inside buildings, which can be physically attractive and wholly self contained. The economy does however still need activities which have to take place outside and which are bad neighbours e.g. scrap yards, outdoors windrow composting (where the scale is only economic when outdoors) and landfills. These are not likely to achieve a “very good” BREEAM rating, but are nonetheless fundamental to the delivery of sustainability. Therefore an exceptions policy should be considered under Option 5 where the proposed development itself contributes to the deliverability of sustainable ends or mitigate climate change.

46. It must be stressed that the County Council, as Waste Planning Authority, has no proposals for the establishment of these kinds of facilities anywhere in the County at present and that it is very unlikely that any case could be made for Redditch needing to have any more of these than any other District.

47. Q13 - How can we support the economy of the rural areas of Redditch? - Options 1 and 2 are both viable but should be considered as complimentary, rather than discrete choices. Option 2 is supported with regards to the possibility of encouraging waste management facilities.

48. Q13 - Option 3 seems incongruous in the Core Strategy. Some justification of why this is an important issue in the Borough would be helpful, but the Context document rightly states that this should be in the form of a development control policy – i.e. not suitable for inclusion in the Core Strategy. The Option seems unfounded, and focusing on a very specific sector seems inappropriate and could be seen as an open invitation to developers of caravan and chalet parks. This could lead to poorly regulated development and unacceptable loss of countryside. If it is to be included it may sit more comfortably within Issue 21 Leisure and Tourism. Any future development should be mindful of the impact on landscape character and should also be sustainable within RSS Policy PA10C.

49. Q13 - Option 4 is not an appropriate Option for inclusion in the Core Strategy. Whilst the RSS provides the higher-level regional context, it is important that this is translated into more appropriate policies at the local level, as specified in RSS Phase 2 Preferred Option Policy PA14.

50. Q13 - With regard to Option 6 recognise that some deposits of building stone may exist in the Borough (existence of stone buildings/features, especially modest vernacular structures or walls will be evidence of this) and of both local deposits and potential employment. Such sites can be very small. About 10 permissions for such have been given in Herefordshire – all for sites which started at 0.1HA in size, none of which generated any objection to the application and only one of which has led to a complaint from a neighbour. Hereford and Worcester Minerals Local Plan Policy 6 and Worcestershire Structure Plan Policy M4 (all saved by the Secretary of State) would permit such developments. The Core Strategy should recognise the possibility of such sites.

51. The Minerals Core Strategy will address these issues – but is unlikely to commence before 2011. Other than the presence of existing stone features and of former working (many of which may have been in-filled and may only be detectable from old maps) there may be no evidence for any such workings at present.

52. Q14 - The policy options should be aware of the RSS Phase Three revisions for Green Belt.

53. Q14 Option 1 - Although Green Belt Policy, as set out in PPG2, states that one of the uses of land in the Green belt is “to retain attractive landscapes, and enhance landscapes, near to where people live”, this landscape element is not sufficient in itself to justify the Green Belt, as it does not form one of the ‘purposes’. It could be argued that this is therefore not a valid Option for inclusion. Landscape considerations should rightly form part of the planning process, but not necessarily in relation to the Green Belt.

54. Q 15 - The context document suggests that the balance between employment and housing provision on ADR land is debated in the Issues & Options Document, but there is very little in either document to allow an informed decision to be made. The sustainability of each form of development will have been examined through a previous Inspector’s report, and this could form the basis for any debate.

55. Q 15 - Has an ecological impact assessment been undertaken on these units of land? If not, it is not appropriate to make a decision on this Option.

56. Issue 12 Landscape and Townscape - The opening introductory paragraph on page 44 contradicts itself. Redditch’s water tower is described as both a good example of a distinctive townscape feature which is not valuable, whilst also being recognisable and valued.

57. Q 16 - As suggested in the context document, Worcestershire County Council’s Landscape Character Assessment (LCA) can be a very useful tool, and it would be useful to make reference to the LCA in the Core Strategy. For example locations in the south west of Redditch Borough are considered to be of high sensitivity meaning that if their landscape character was to be lost it would be difficult to restore them.

58. Issue 13 - This issue is an important one, and this is confirmed in the context document, but there is only one question here, referring to the local list. Heritage issues extend beyond the local list, and despite the context document stating that some issues are “too detailed for the Core Strategy” it would be reasonable to expect slightly more coverage of such an important issue.

59. Little mention of historical or cultural sites or features, whether in private or public hands that should be protected and the settings of which should be considered when planning for development. Examples – Archaeological sites, historic parks and gardens (Norgrove Court).

60. Issue 14 - Even with potentially high growth aspirations set out in the RSS, it must be queried whether a tall buildings policy is required for Redditch. If required, consider the impacts on the wider landscape including the cross boundary impacts especially if Options 2 and 3 are adopted.

61. Issue 14 Option 1 – If it is concluded that such a policy is required then this is a reasonable option, as the Town Centre is the only location within the Borough that tall buildings could potentially be located.

62. Issue 14 Option 2 – It is unlikely that a tall buildings policy would be of value across the whole Borough, as those areas beyond the Town Centre will not be suitable for tall buildings.

63. Issue 14 Option 4 – This could well be the most appropriate option for Redditch Borough.

64. The Core Strategy should recognise that some tall structures, e.g. chimneys to ensure sufficient dilution plumes are necessary for certain industrial activities and will make sure that these are not automatically frustrated; Option 3 and 4 would be the most suitable in such circumstances.

65. Q 19 - Option 7 supported with regards to waste. Some activities, such as recycling/Energy recovery inherently contribute towards sustainability and could mitigate climate change. It is hoped that the Core Strategy will recognise that these may be most sustainable located close to other development. The best way to secure this could be through an exemptions policy for such activities.

66. Page 49 - Whilst it is important to create commercial development adjacent to new residential growth (suitable infrastructure permitting) so that the length of journeys to work is minimised (Option 2), future development for both residential and industrial use should be focused on key transport corridors where the infrastructure is either already in place or can be adapted accordingly, which will ensure maximum accessibility by sustainable modes to existing and future residents of residential areas (Option 5). If this is not acknowledged then accessibility by sustainable modes will be restricted, which will increase reliance on the car to access employment locations, contrary to national, regional and local policies and guidance.

67. Q 21 - Option 1 is not supported with regards to waste management. There does not seem to be any evidence to rule out large sites. The inclusion of an exemptions policy as suggested in Q10 would be supported.

68. Issue 20 - The options do not identify those districts with the larger deficit in service provision or those that may come under additional pressures subject to additional housing development.

69. The policy could have wider aims in terms of improving Health and Well-Being by including both Issues and Options for sustainable transport (walking and cycling, RSS Policy SR2 E), provision of green space and provision of leisure facilities. Health and Well-Being should also recognise future health issues in relation to Climate Change from heat exhaustion etc and also the future ageing of the Boroughs population. This may include building standards for adaptation (RSS Policy SR1C ii) and CABE 'Building for Life Standards' RSS Policy SR3 B.

70. Whatever option is chosen, it is hoped that it will recognise the need to include waste storage and collection and sufficient space for vehicles to manoeuvre to collect any such wastes.

71. Q29 - Regional and sub-regional policy / strategy isn't considered. Reference to working with Destination Worcestershire and Conference Worcestershire on the development of tourism and specifically business tourism was expected. The Regional Visitor Economy Strategy, recently revised, would also be worth consideration.

72. Since Redditch is a Local Authority partner in Destination Worcestershire, "promotion" of tourism is done through the partnership, particularly in terms of marketing across the county and the U.K. Local Authority partners are encouraged to contribute to local tourism development through management and provision of TIC's, infrastructure development and support for the business cluster. Whatever option is chosen, it is hoped that it will recognise the need to include waste storage and collection and sufficient space for vehicles to manoeuvre to collect any such wastes.

73. Issue 22 - How do the options identified help to deliver the Strategic Objective of "To have a strong, attractive and diverse economic base with employees with higher skills levels"?

74. The policy options do not identify the potential for enhancement and creation of new environments and open spaces particularly within new developments. The options seem resigned to either maintaining the status quo or some inevitable loss of greenspace. The preferred option should look towards developing a green infrastructure network that incorporates open spaces and their multi functionality. For example, open space has a role to play in mitigation and adaptation for Climate Change.

75. Key Theme E Meeting the needs of children and young people - The County Council will seek to provide appropriate, sustainable educational infrastructure to support the required housing growth in Redditch.

76. There is insufficient information in the Issues and Options Document to provide details of the specific infrastructure requirements. However, two of the three ADRs identified for development are located in areas where there is limited scope to absorb any significant growth in pupil numbers, although there is spare capacity in other parts of Redditch. Consequently, new first schools may be required to serve housing development in the Webheath ADR and the Brockhill ADR. The County Council will monitor the situation at middle and high school level but we do not anticipate that any additional sites will be required at this point.

77. The County Council will take account of where housing growth will be located in neighbouring districts so that a strategic approach to education infrastructure is applied. Housing in Stratford District would fall under Warwickshire LA for education matters.

78. Key Theme F Stronger Communities - Some of the objectives under the stronger communities on page 24 are different to those in the stronger communities section. The 'Reduce crime and anti-social behaviour' is not picked up as an objective, under the Stronger Communities chapter though it does appear on page 24. Although the objective is highlighted under other chapters, should have perhaps been included under issue 27 – Redditch Distinctiveness.

79. Would suggest that the reduce crime and anti-social behaviour objective is addressed in the Stronger Communities chapter in order to reach goal of becoming the '*Safest town in England*' as highlighted in the Spatial Portrait.

80. In considering these issues the document sets out possible options for how they may be tackled. However it could be questioned the extent to which the options are genuinely different. In some instances an either/or option has been identified as is the case under Q45, but in other cases a combination of the 'Options' will be desirable. No options have been set out under Issue 27 Redditch Distinctiveness, just a set of advantages and disadvantages for a set of features. Redditch Borough Council will need to consider how it is going to further develop this issue in to policy.

81. Q 32 - PPS3 states Local Development Documents should include a local previously developed land target and trajectory (having regard to the national and regional previously developed land target in the Regional Spatial Strategy). Include a local previously developed land target and trajectory and strategies for bringing previously-developed land into housing use.

82. Take account of monitoring undertaken by the RPB which will measure the progress in meeting the PDL percentages.

83. Whichever option is chosen it is hoped that it will make provision for the temporary storage and possibly remediation, of any contaminated land which is identified and that provisions will be imposed requiring clarification of where any such material is removed.

84. Q 33 - Does not need to be an either/or option as options could be combined. Suggest 'Restrict development on back gardens where there is evidence of its impacts on the locality, for other development criteria based Policy will ensure that any development in back gardens is in keeping with the surrounding environment'. As suggested in Issue 22 the development of green infrastructure strategy could address the role that gardens play in the character of the area.

85. Q 34 Option 2 - Shouldn't the urban area of Redditch have a higher density per hectare than the less built up areas of Astwood Bank and Feckenham?

86. Q 34 Option 4 - Redditch Borough should define what is meant by 'District' and how they will determine what density will be suitable for what character. How will Redditch Borough Council define what the character is for each District?

87. Issue 27 - The preferred option will need to look to increase the overall stock of urban trees as stated under Policy QE4 Greenery, Urban Greenspace and Public Spaces.
88. The following extract is taken from the Context to the Core Strategy Issues and Options document "Not an issue for the Issues and Options Document – Water. 'This context considers pollution of water, flooding, water resources and drainage. The West Midlands Regional Flood Risk Appraisal identifies that flood risk is not seen as a significant factor in strategic planning in Redditch as there is a relatively low flood risk'." This only takes account of flood risk and not pollution which is going to be an increasingly important issue as a result of the Water Framework Directive and River Basin Management Plans. Officers suggest this is an issue for the preferred option, along with water supply, drainage and surface water flooding."
89. Concern that there is currently no discussion of water issues in the Issues & Options document, but welcome the statement that once the SFRA is completed, this will inform the Preferred Option. Have regard to the Redditch Policy Unit as set out in the Severn Catchment Flood Management Plan, by the Environment Agency.

Officers Response to comment(s)

1. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
2. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
3. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
4. Officers note the comment
5. In terms of the additional strategic sites to be included within the Draft Preferred Core Strategy at this stage it may only be considered appropriate to include the Abbey Stadium site, which officers consider should be designated as a Strategic Site instead of being identified on the Key Diagram by a star. Officers do not consider that this addition as a Strategic Site will raise any conformity issues with the WMRSS.
6. Officers note the comment
7. Officers consider that the SHLAA and Employment Land Review will determine the most appropriate uses for the ADR sites. This process does not prejudice RSS housing provision.
8. Officers note the comment
9. Officers note the comment
10. Officers note the comment
11. Officers note the comment
12. Officers note the comment
13. Officers consider that Option 3 does not promote or intend to promote the inclusion of Redditch within the High Technology Corridor. The purpose of the Option was to only establish links with institutions within the HTC being as the Borough is within the sphere of influence of the HTC.
14. Officers note the comment
15. A SHLAA and Employment Land Review are currently being undertaken and as part of these assessments, they identify possible areas of open space that could be used for development. The Borough Council are also undertaking an open space needs assessment refresh and one of the outputs of this is to determine whether any open space may be suitable for development.
16. Officers agree that a local policy approach is a viable option and that the advice concerning Option 3 is valid.
17. Officers note this reference to the WMRSS and this will be considered in the preparation of any policy approach for development on back gardens.
18. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
19. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
20. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.

21. Officers note the comment
22. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
23. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
24. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
25. Officers note the comment
26. Officers note the comment
27. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
28. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
29. With regard to SSSIs, SWSs and LNRs these are assessed by a process outside of the preparation of the Core Strategy. In terms of the specific biodiversity issues relevant for the Core Strategy Issues and Options Document, it was considered there were no significant, locally distinctive issues with appropriate Options to present at that stage. However this does not preclude the incorporation of biodiversity issues in later stages of the Core Strategy and it is likely that biodiversity will be given appropriate consideration in the Draft Preferred Core Strategy.
30. Officers accept that there can be positive outcomes to the environment however the purpose of the issue was to highlight that there is a conflict between some methods of combating the issue of Climate Change and some negative effects on the built, natural or historic environment. This particular issue was presented in the Issues and Options Document in an attempt to secure some meaningful feedback on the issue. However Officers do not consider it to be appropriate to include reference to the benefits that may arise as a result of climate change and it is unclear how Redditch could feel any potential benefits which would not be felt elsewhere.
31. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
32. Officers accept that there can be positive outcomes to the environment however the purpose of the issue was to highlight that there is a conflict between some methods of combating the issue of Climate Change and some negative effects on the built, natural or historic environment. This particular issue was presented in the Issues and Options Document in an attempt to secure some meaningful feedback on the issue. However Officers do not consider it to be appropriate to include reference to the benefits that may arise as a result of climate change and it is unclear how Redditch could feel any potential benefits which would not be felt elsewhere.
33. The diagram referred to, will not be used in the production of the Draft Preferred Core Strategy.
34. Officers note the comment
35. Officers note the comment
36. Officers agree that off-site generation would be more beneficial than carbon offsetting and this approach is likely to be presented in the Draft Preferred Core Strategy. Before any carbon off-setting procedure is accepted as a realistic approach, it will be investigated as to its viability in Redditch.
37. The question is phrased to incorporate all development as it is considered by Officers that all new development would be capable of meeting a portion of its energy requirements through renewable energy. The current consultations regarding off-site generation and zero-carbon non-domestic buildings will be considered during the preparation of the Draft Preferred Core Strategy.
38. The question is phrased to incorporate all development as it is considered by Officers that all new development would be capable of meeting a portion of its energy requirements through renewable energy. The current consultations regarding off-site generation and zero-carbon non-domestic buildings will be considered during the preparation of the Draft Preferred Core Strategy.

39. Officers do not consider that there will be any justification for the requirement for 20% therefore this is not likely to be presented in the Draft Preferred Core Strategy.
40. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
41. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
42. The Core Strategy is intended to run until 2026 and it is agreed that there should be enough flexibility within the Core Strategy to ensure accordance with National Policy. It is expected that the standards of Code level 6 and BREEAM 'excellent' will be in place before the end of the Core Strategy life and therefore these standards will be achieved by 2026. Officers do not consider that there will be any justification for higher Code for Sustainable Homes requirements or BREEAM ratings to be requested over and above the National requirements.
43. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
44. Officers note the comment
45. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
46. Officers note the comment
47. Officers note the comment
48. The Context to the Issues and Options Document states that "... take the form of a Development Control Policy; however the principle of support is presented as an Option". Supporting these kinds of development was considered to be a viable alternative option to be presented in the Issues and Options Document, as this relates to the issue of improving the economy of rural areas.
49. Officers note the comment
50. Officers consider this to be a valid alternative option.
51. Officers note the comment
52. Officers note the comment
53. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
54. Officers note the comment
55. The alternative approaches for the use of these parcels of land will be presented in the Preferred Draft Core Strategy.
56. The Issues and Options Document states that the Water Tower is valuable in terms of its contribution to the distinctive character of Redditch, but this is the only sense in which the tower is regarded as valuable. The focus of the question relates to Redditch's distinctive townscape and landscape.
57. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
58. After pre-consultation with English Heritage where Officers presented some suggested inclusions into the Issues and Options Document, it was considered there were no significant, locally distinctive issues with appropriate Options to present at that stage. However this does not preclude the incorporation of heritage issues in later stages of the Core Strategy.
59. After pre-consultation with English Heritage where Officers presented some suggested inclusions into the Issues and Options Document, it was considered there were no significant, locally distinctive issues with appropriate Options to present at that stage. However this does not preclude the incorporation of heritage issues in later stages of the Core Strategy.
60. The impacts of every option presented in the Issues and Options Document have been scrutinised through the completion of a Sustainability Appraisal. One of the SA Objectives relates to landscape in particular "To maintain and support local landscape character and distinctiveness" and a slight positive impact is predicted from Options 2 and 3 when tested against this SA Objective.
61. Officers note the comment
62. Officers note the comment
63. Officers note the comment
64. Officers note the comment

65. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
66. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
67. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
69. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
70. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
71. At the time of preparation The Regional Visitor Economy Strategy was not available. During the preparation of the Preferred Draft Core Strategy, Destination Worcestershire and The Regional Visitor Economy Strategy will be considered and incorporated where appropriate.
72. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
73. Officers consider that there is an option for Open Space to be used to meet Redditch Borough employment requirement as set by the WMRSS, necessitating the inclusion of this objective in relation to this issue.
74. The Open Space Needs Assessment refresh will audit the current Open Space in the Borough and changes to the standards of Open Space will be considered when this assessment is available. Officers accept that the development of a green infrastructure network is likely to be a strong component in the Draft Preferred Core Strategy.
75. Officers note the comment
76. Officers note the comment
77. Officers note the comment
78. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
79. Since the publication of the Issues and Options Document, the aspiration for Redditch to become the safest town in England is no longer supported by Redditch Borough.
80. It is acknowledged and it was intentional that some of the questions presented under the stronger communities theme were likely to be an 'either/or' option or open ended questions. Officers did not consider it to be essential that all issues can have a variety of options which are all sufficiently distinct and standalone. Where no options are presented, it was still considered relevant to address these issues in the Issues and Options Document.
81. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
82. Officers note the comment
83. Officers note the comment
84. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
85. Officers consider that this suggestion is included as Option 3.
86. Consider including the definition of 'District' into the glossary as per the description of local centres in Planning Policy Statement 6 and definition of 'District' in relation to Option 4 of Issue 34 if this were to be the preferred approach. If the option to require different densities for each District depending on character were to be the preferred approach this would have to be informed by an urban townscape character assessment.
87. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
88. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.
89. This approach/comment/suggestion may be incorporated in the Preferred Draft Core Strategy.

Action to be taken with comment

1. This approach/comment may be incorporated into the Core Strategy during its preparation.
2. This approach/comment may be incorporated into the Core Strategy during its preparation.

3. This approach/comment may be incorporated into the Core Strategy during its preparation.
16. This approach/comment may be incorporated into the Core Strategy during its preparation.
18. This approach/comment may be incorporated into the Core Strategy during its preparation.
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81. This approach/comment may be incorporated into the Core Strategy during its preparation.
84. This approach/comment may be incorporated into the Core Strategy during its preparation.
86. Consider including the definition of 'District' into the glossary.
87. This approach/comment may be incorporated into the Core Strategy during its preparation.

88. This approach/comment may be incorporated into the Core Strategy during its preparation.

89. This approach/comment may be incorporated into the Core Strategy during its preparation.

List of Respondents

URN	Organisation	Name	Agent's Name
001		Mr R. Miles	
002		Prof P. Sanders	
003		Mr P. Joynes	
004		Mr A. Pulsford	
005	William Davies Ltd	Mr R. Jays	
006		N. Grimes	
007		Ms C. Harris	
008		Mrs R. Lingaze	
009		ANOM	
010		G. Stephens	
011		Mr J. West	
012		D. J. Jackson	
013		B. Richmond	
014		Mr R. Edwards	
015		Ms S. Dudley	
016		Mr C. J. Lanne	
017	CPRE	Ms V. Kendrick	
018		Mrs J. Hill	
019		S. Hall	
020	Wm Morrison Supermarkets		Peacock & Smith Ltd
021	West Midlands Regional Assembly	Mr J. Pattinson	
022	Advantage West Midlands	Mr Pearce	
023		Major S. Whittingham	
024		Ms C. Whittingham	
025			
026	Wall, James & Davies	Ms E Mitchell	
027	Highways Agency	Mr C Mercer	
028	GOWM	Mr M Price	
029	West Midlands RSL Planning Consortium	Ms S Jamieson	Tetlow King Planning
030	Persimmon	Mrs S. Bridge	
031	Miller Strategic Land	Ms C. Muston	RPS
032		F. Melley	
033		J. G. Harte	
034		P. White	
035		K. Charris	
036		Mr. D. F. Smith	
037		C.M. Williams	
038		Ms S. A. Williams	
039		Mr. A. Coombs	
040		Mr. A. Waugh	
041		A. Bedford Smith	
042	Gallagher Estates Ltd	Mr L. Burman	Terence O'Rourke
043	Scottish Widows Investment Partnership	A. Conacur	Indigo Planning
044	Barclays Bank Plc	Mr M Fearn	Shire Consulting
045	David Wilson Homes Ltd and Taylor Woodrow Develop	Ms Venham	Barton Wilmore

046	Abstract Healthcare	Integrated	Mr A. Carter	Turley Associates
047				
048	English Partnerships		Mr R. Gardner	GVA Grimley
049	Worcestershire Council	County	Mr D. Bristow	
050			Mrs T. Daphne	
051			Mr D. Ray	
052			Mr P. Isherwood	
053			Ms P Burton	
054			Mr R. Burton	
055			Mr R. Bungay	
056			Mr D. G. Partridge	
057			Mrs L.A Partridge	
058			Mr A. Brittain	
059			Mrs S. Brittain	
060			Mr D. Partridge	
061			Mr D. Brittain	
062			Mr D. Brittain	
063			Mrs. M Oseland	
064			Miss R. Latham	
065			Mr J. Burton	
066			Mr S. Burton	
067			Mr J. Brittain	
068			Mr P. Burton	
069			Ms L. Burton	
070			Mr A. Elvins	
071			Mr A. Tricklebank	
072			Mr A. Cave	
073			Ms S. Surplice	
074			Ms Jones	
075			Mr Burton	
076			Mr A Pearsall	
077			Ms L Davis	
078			Mr L Davis	
079			S.W. Fallows	
080			Mr P. Bladon	
081			Mrs J. Jones	
082	Sport England		Mr B Sharples	
083			Ms D Norman	
084			Mr M. K. Phillipotts	
085	Scottish Investment Partnership	Widows		Turley Associates
086	Mobile Association	Operators		Mono Consultants Ltd
087	Destination Worcestershire		Mr R. Nipper	
088	Natural England		Ms H. Pankhurst	
089	The Theatres Trust		Ms R. Freeman	
090	Worcestershire Trust	Wildlife	Mr S. Bloomfield	
091	West Constabulary	Mercia		Atisreal UK
092	Bromsgrove Council	District	Mrs R. Williams	

093	Environment Agency	Ms R Forrester	
094	Passenger Transport Team	Ms M. Jones	
095		Mrs R. Smith	
096	CB Richard Ellis	Mr A. Bowe	
097		A.K. Strong	