

Ref: APP/Q1825/W/24/3350905

28th October 2024

# Proposed residential development on land off Hither Green Lane, Redditch LPA Ref: 21/01830/FUL

PINS Ref: APP/Q1825/W/24/3350905

## Statement on behalf of North Redditch Communities Alliance (NoRCA)

#### Introduction

This Statement has been prepared by NoRCA to supplement, but not replicate nor replace, its previous representations to Redditch Borough Council in respect of this application. Its primary objections are outlined in its original report to the Council which is attached as Appendix I for ease of reference.

NoRCA is aware of the further amendments made by the applicant as part of its appeal submission. NoRCA makes no comment on the procedural issues raised by this as there have been numerous inaccuracies, other late submissions and significant delays in responsiveness during the course of this application, all of which seem designed to treat the local communities with disdain and irrelevance. However, it does wish to place on record that the latest changes do nothing to change the relevance or legitimacy of NoRCA's previous submissions to the Council, nor, more importantly, the criteria given in the unanimous, cross-party, decision reached by the Planning Committee in refusing the application.

NoRCA wishes to reaffirm that it is an alliance of communities across north Redditch extending well beyond the Abbey Park community which will be initially most directly affected by this application. It is <u>not</u> a NIMBY organisation and is not opposed to new housing development. However, the north of the Borough is already over-developed; the threat of even further erosion of green open space is felt very strongly by residents.

Whilst this application may have been the catalyst for its formation, the primary aim of NoRCA is to ensure that Redditch continues to grow and thrive but does so in a planned and appropriate way as opposed to shoehorning development onto inappropriate sites in advance of a proper holistic evaluation of housing needs against potential sites.

NoRCA is understandably concerned that one of the more prestigious housing areas in the Borough will be literally devalued by the proposed development. This would be counter-intuitive to attracting the entrepreneurial and aspirational families that are necessary in order to achieve economic growth.

NoRCA has previously submitted its Terms of Reference to the Inquiry.



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### HLS/HDT and the Local Plan Review

Redditch Council has achieved an enviable record of housing delivery over many years – such that it presently has more than a 10 years' supply of housing land. The applicant claims that this is likely to change with possible revisions to the NPPF. Whilst there may be an increase in the Borough's housing target it is wrong to simply apply this as an instant justification to suddenly release unsuitable sites; the wider implications have to be considered – which should form part of the Local Plan Review.

The Inspector will be aware that the Local Plan Review is imminent and that any increased housing requirement will be subject to an early site assessment. Possible sites will be considered holistically to ensure that the most appropriate locations are brought forward. NoRCA is fully supportive of this proper assessment and process. The current availability and deliverability of existing allocated housing sites is such that the Inspector can be confident that a rejection of the appeal at this time will not prejudice or unreasonably constrain housing delivery across Redditch Borough in the short term.

Much is being made by the applicants of the proposed changes to the NPPF in terms of housing numbers; however, the proposed changes are not simply about housing growth but are designed to secure economic growth as well. Indeed, equal weight has to be given to economic factors. NoRCA has demonstrated that any uplift in housing numbers is not sufficient to override due processes in terms of site selection – and certainly it is not sufficient to override and damage the delivery of economic growth within the Borough and surrounding area.

### Traffic and Transport

NoRCA contends that the traffic and transport details submitted by the applicant is based upon misleading information. It contends that the Inspector cannot rely upon the conclusions with any degree of confidence.

NoRCA's summary of traffic and transport is attached as Appendix II.

## Environment / Open Space

The Council's Strategic Planning Team made a clear and strong objection to the proposed development, based upon conflict with the Local Plan policies 11, 12 and 13. That conflict remains. Even if housing targets are increased as a consequence of the proposed changes to the NPPF, the importance of the adopted Development Plan remains. It is clear that the area is already deficient in open space. Moreover, as a wildlife corridor, it is not something that can or should be easily overridden by any short-term housing target changes – particularly when the LPA has consistently achieved substantial housing over-delivery and is in the process of reviewing its Local Plan.

NoRCA is mindful of Local Plan Policy 43.3 that relates to the Well-being of the Redditch Community which will be seriously and detrimentally impacted by this application. There is no justification to build on designated green open space and leisure land.



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## **Proposed Design**

NoRCA notes that the applicant has made some cosmetic changes to the design of the proposed properties. However, these are still greatly at variance both in terms of style, appearance and density with the current properties immediately adjacent to the proposed development site. The criteria given by the Planning Committee for refusing the application remains valid.

#### Golf

At present the Abbey Park golf course is the only championship standard course open to the public in Redditch and the wider area. NoRCA appreciates the Abbey Hotel owners are at liberty to make decisions regarding their own business; however, the value of a championship standard course attached to the hotel cannot be overstated in the context of Redditch's wider leisure offer. It is, without doubt, a significant attraction to the area – one which will be lost when the course is degraded.

#### Covenant

NoRCA recognises that the presence of the Covenant that restricts the golf course land to leisure use only is not a direct matter for the planning process. However, it is something that should be recognised in the decision-making process inasmuch as there are potential issues of mortgaging and insurance to be considered.

The Covenant is of particular interest to those current residents who were the initial purchasers of properties on Abbey Park. £10,000 of the initial purchase price of the property was set aside for the subsequent development of the golf course and hotel.

#### Future submissions

NoRCA reserves the right to add to this submission in the event that the NPPF is published in an amended form before the Inquiry.

## Representation

Due to circumstances beyond its control, NoRCA has reluctantly had to decide to not request Rule 6 status at the Inquiry. However, it still intends to participate as an interested party and will seek the support of elected representatives, current and former MPs, County Councillors, Borough Councillors and Parish Councils.

I trust the above provides the Inquiry with a clear and unambiguous justification for the unanimous decision of the Planning Committee to be upheld.

For and on behalf of NoRCA

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