
Land off Hither Green Lane, Redditch

Planning Statement

On Behalf of Barratt David Wilson Homes Mercia

December 2021

Land at Hither Green Lane, Redditch
Planning Statement

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1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Barton Willmore LLP on behalf of Barratt David Wilson Homes Mercia ('the Applicant') in support of a planning application for a proposed residential development at Land off Hither Green, Redditch ("the Application Site").

1.2 This application is submitted as a Full application. Full planning permission is sought for 216 dwellings with the following description of development:

'Residential development (Class C3) with a vehicular access point onto Hither Green Lane, play areas, public open space including footways and cycleways, sustainable urban drainage systems and all other ancillary and enabling infrastructure'

Planning Application Package

1.3 This Planning Statement should be read alongside the other documents which are submitted as part of this application.

Statement Contents

1.4 This Statement provides an overview of all aspects of the proposed development and an assessment of its appropriateness against the Development Plan and other material considerations. The scope of this Statement is as follows:

- **Section 2** describes the Application Site and the main features of the surrounding area;
- **Section 3** sets out the pre-application engagement undertaken by the Applicant;
- **Section 4** outlines the main components and features of the proposed development;
- **Section 5** outlines the relevant planning policy context of the Application Site and the proposed development;
- **Section 6** provides our planning assessment of the proposed development including overall compliance with adopted Development Plan Policy and other material considerations;
- **Section 7** sets out the draft S106 Heads of Terms; and
- **Section 8** provides a summary and our conclusions on the proposed development.

2.0 THE SITE AND THE SURROUNDINGS

2.1 This Section provides details on the Application Site's location, surroundings and key physical characteristics. A Site Location Plan has been submitted alongside this application.

The Site

2.2 The Site consists of an irregularly shaped parcel of land, which is currently comprised of:

- a surfaced car park and maintenance area, at the north-eastern corner of the application Site;
- areas of tall grassland, scrub, mature and semi-mature trees and a pond, at the north-east of the Site; and
- an existing golf course, which is located at the centre and south of the Site.

2.3 There are no public footpaths crossing the Site. The nearest public rights of way are to the north of the Site (628C) and along Dagnall End Road and Hither Green Lane, to the east of the Site. There is a permissive footpath to the south of the site.

2.4 All of the trees within the Site are covered by a blanket Tree Preservation Order (TPO).

2.5 Access into the Site is currently provided off Hither Green Lane to the east.

2.6 It is confirmed by the Environment Agency's online mapping system that the Site is located within Flood Zone 1 and therefore has a low risk of flooding. There are nominal areas of surface water flooding around the existing pond at the northern end of the Site, as well as along the south-western boundary.

2.7 The Site itself is free from any formal ecological designations, albeit the Dagnell End Meadow Site of Special Scientific Interest (SSSI) is located approximately 450m to the east of the Site. The Abbey & Forge Mill Pools & Streams Special Wildlife Site is also located 500m to the south-east. Protected species reports have been submitted as part of this planning application.

2.8 Historic England's online mapping system confirms that there are no heritage assets located within the Site. There are several Listed assets located approximately 200m to the west, namely:

- Grade II Listed Bordesley Lodge Farmhouse;

- Grade II Listed Granary about one yard north of Bordesley Lodge; and
- Grade II Listed Water pump about 3 yards north east of Bordesley Lodge Farmhouse.

2.9 Bordesley Abbey Scheduled Monument is also located approximately 450m to the south.

The Surrounding Area

2.10 The northern boundary of the Site is bordered by Dagnell End Road, beyond which sits linear residential development. To the east is Hither Green Lane beyond which sits the main complex of the Abbey Hotel and Golf Course, and to the south are large, detached dwellings. To the west lies the Meadow Farm Public House and Hotel, separated by an area of open grazing land.

2.11 There is a bus stop directly outside of the Site, on Hither Green Lane. There is another bus stop located on Dagnall End Road, approximately 100m to the north of the Site. Services from these stops provide access to Bromsgrove, Kidderminster, Worcester, Stratford-upon-Avon and Birmingham, amongst other locations. Redditch Train Station is also located approximately 3.5km from the Site. Redditch Train Station provides access to a number of locations including Birmingham and Sutton Coldfield.

2.12 The surrounding area has a range of services and facilities. To the northwest of the Site, along Birmingham Road, there is a local Marks & Spencer's forming part of a petrol station. It is located approximately 400m from the Site (5-minute walk). To the west of the Site is a hotel and public house. This is located approximately 250m (4-minute walk) from the Site. There is a Sainsbury's, B&M and Argos within a 20-minute walk of the Site, approximately 1km to the south.

2.13 Further to this, the Site is located close to the centre of Redditch (approximately 1.5km). Redditch town centre provides a wide range of facilities, including small retail stores, banks, churches, healthcare facilities, restaurants and cafes, supermarkets and leisure facilities.

2.14 In terms of education, St Stephen's First School is located approximately 1km south of the Site, and Holyoakes Field First School & Nursery is approximately 1.7km to the south. Trinity High School & Sixth Form is also located approximately 1.5km to the south.

2.15 In addition to the above, the Brockhill East strategic site is located approximately 500m to the south-west of the Site, which is allocated for a high-quality mixed-use development comprising around 1,025 dwellings, employment and relevant community facilities, a

district centre, a first school and a sustainable public transport network. There have been a number of approved planning applications on the Site. As well as housing, these applications have included a Community House (2014/256/OUT) and a new two-form entry school (16/00007/REG3). Most recently, a planning application was resolved to be approved on the Site in January 2021 (Planning Application Reference: 19/00977/HYB), which includes a new District Centre (including a convenience store, a new community building and smaller scale retail units), play facilities and public open space. Therefore, it is also considered that the Site will benefit from the services and facilities brought forwards as part of this allocation.

Planning History

- 2.16 A review of the online planning application portal has been undertaken. Whilst there have not been any previous planning applications on the Site for residential development, planning permission was previously approved on the Site for the 'Erection of 25 lodge style bedroom accommodation units ancillary to the main hotel with associated landscaping and infrastructure (Application Reference: 2008/386/FUL). The decision for the application was issued on the 6th March 2009.
- 2.17 Minor amendments to the site layout and shape of the lodge were then sought as part of planning application reference 2011/335/NMC. The application was approved on the 12th of January 2012.

3.0 PRE-APPLICATION ENGAGEMENT

Pre-Application Engagement

- 3.1 Prior to the submission of the planning application, pre-application consultation was undertaken with the golf club members and local residents.
- 3.2 An event was set up with the golf club members in November 2021 to discuss the proposals for the reconfigured course. The proposals for the residential development were discussed but not in detail at that stage. This first consultation was carried out by the hotel, who will retain responsibility for the course and its on-going management and Members were assured that the course will remain as an 18 golf course.
- 3.3 Following consultation with members, leaflets were distributed to those living closest to the site advising that a dedicated project web-site was set up: www.landwestofhithergree.co.uk and that the proposals could be viewed and comments supplied. A summary of the comments received is enclosed at Appendix **.
- 3.4 No comments were provided in respect of the actual scheme layout and therefore no revisions were made to the scheme.

4.0 THE PROPOSED DEVELOPMENT

4.1 The planning application comprises the following description of development:

'Residential development (Class C3) with a vehicular access point onto Hither Green Lane, play areas, public open space including footways and cycleways, sustainable urban drainage systems and all other ancillary and enabling infrastructure'

4.2 The planning application includes the following:

- 216 dwellings, including 65 affordable dwellings;
- Vehicular access from Hither Green Lane;
- Pedestrian and cycle access providing links through the Site and to the surrounding areas;
- Publicly accessible open space (3.4ha);
- Green Infrastructure (GI) includes a Local Equipped Area of Play (LEAP), informal recreational areas, SuDS features, buffer planting, retained trees, hedgerows and areas of new trees planting and other habitat creation;
- Landscaping and earthworks and surface water drainage;
- Associated amenity space and attenuation features; and
- Internal infrastructure.

4.3 The street typologies provide a logical framework of streets and spaces with a clear hierarchy – Main Streets and Secondary / Tertiary Roads.

4.4 The proposed layout for the Application Site includes recognisable built forms and features to enhance legibility throughout the development, including feature spaces, landmark buildings, co-ordinated building materials and high-quality landscaping to help define the street scene.

4.5 The table below identifies the mix of dwellings proposed:

Table 4.1 Proposed Dwellings Mix

	Market	Affordable	Total
1 bedroom	-	1	1
2 bedrooms	-	36	36
3 bedrooms	81	28	109

4 bedrooms	70	-	70
Total	151	65	216

- 4.6 65 affordable dwellings will be provided as part of the development, delivering a range of 1 bed maisonettes and 2/3-bedroom houses. 42 of these will be affordable rent, and 23 will be shared ownership. They are evenly distributed through the Site.
- 4.7 A mixture of detached, semi-detached and terraced properties will be provided. Each dwelling has a good level of usable amenity space, with all houses having access to a private garden and all maisonettes having a shared private amenity area. The building heights of the dwellings will be predominantly two storeys in order to respond to local character, with 2.5 storey dwellings plotted in key areas, such as along the main street, stop ending key vistas and around areas of open space.
- 4.8 An analysis of the local area / surrounding context has been undertaken, which has influenced the design of the proposed dwellings and the palette of materials proposed; principally variations in red / orange brick and a red clay tile roof. Focal buildings and feature spaces will be emphasised through the use of timber and render detailing or solid render.
- 4.9 Primary pedestrian and cycle access into the Site will be afforded via the existing access point from Hither Green Lane, at the north-east corner of the application Site. The proposed development will also include a new pedestrian route between the Site and Dagnell End Road. A new section of footway will be provided on the southern side of Dagnell End Road, within the existing highway boundary. To the south and west pedestrian / cycle connections will be provided with the existing NMU connection which runs alongside the River Arrow and connects with Birmingham Road immediately north of the river over-bridge.
- 4.10 Multiple large and incidental open spaces are provided throughout the development, which will be accessible to new residents and the existing community by way of new footpath links. Within the development there are a range of well-located open spaces including a LEAP. Further details can be found in the Design and Access Statement.
- 4.11 Existing trees are proposed to be retained where possible, and landscaping works including tree planting is proposed throughout the Site. This is further illustrated by the plans and drawings which accompany this submission.

- 4.12 Further details of the proposed development and the design rationale are contained in the Design and Access Statement which is submitted as part of the application documentation.

5.0 PLANNING POLICY CONTEXT

Introduction

5.1 This Section sets out the planning policy framework relevant to the Site and proposed development.

The Development Plan

Borough of Redditch Local Plan (2017)

5.2 The Redditch Borough Plan No 4 (RBP) was adopted in January 2017. It seeks to guide development across the Borough up to 2030.

5.3 The Proposals Map which accompanies the RBP identifies the Site as 'Primarily Open Space'. As such the following policies are relevant to the submitted proposal:

5.4 **Policy 1: Presumption in Favour of Sustainable Development** – When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.

5.5 **Policy 2: Settlement Hierarchy** – The location and scale of development should accord with the settlement hierarchy. Redditch urban area will be the focus for development.

5.6 **Policy 3: Development Strategy** – Sites focused in Redditch are encouraged to be developed earlier in the Plan Period. The suitability of sites to be brought forward for development will be determined following satisfactory demonstration of how all necessary infrastructure will be funded and delivered. Should the required rates of housing delivery not be achieved, the Borough Council will employ proactive planning measures.

5.7 **Policy 4: Housing Provision** – Identifies a requirement for around 6,400 new dwellings over the Plan period. A mix of housing will be sought in terms of size, scale, density and tenure which reflects the Borough's needs. The provision of housing for elderly people is encouraged.

5.8 **Policy 5: Effective and Efficient Use of Land** – Densities of between 30 and 50 dwellings per hectare will be sought in Redditch Borough. Higher densities should be provided near to public transport exchanges and where it can be demonstrated that there

will be no detrimental impact on the amenity, character and environmental quality of an area.

- 5.9 **Policy 6: Affordable Housing** – On sites of 11 or more dwellings, a 30% contribution towards the provision of affordable housing will be required. The Council will seek to negotiate the mix of affordable housing tenures on individual schemes taking account of local needs, the housing mix in the local area and the impact on viability. A mix of social rented and intermediate housing / affordable rent will generally be sought.
- 5.10 **Policy 11: Green Infrastructure** – The existing GI network will be safeguarded and new development will be required to contribute positively to the GI network. Opportunities will be sought to improve and maintain the network for the benefit of people, wildlife and the character and appearance of the Borough.
- 5.11 **Policy 12: Open Space Provision** – The Borough Council will aim to maintain minimum standards of open space provision as identified in the Open Space Needs Assessment and Playing Pitch Strategy. New development will be required to make provision for new and/or improvements to open space, sports and recreation facilities in accordance with the Open Space Provision Supplementary Planning Document (SPD).
- 5.12 **Policy 13: Primarily Open Space** – Proposals which would result in the loss or partial loss of Primarily Open Space will not normally be granted planning permission unless it can be demonstrated that the need for the development outweighs the value of the land as an open area. In assessing applications for development on Primarily Open Space the following will be taken into account:
- i. the environmental and amenity value of the area;
 - ii. the recreational, conservation, wildlife, historical, visual and community amenity value of the site;
 - iii. the merits of retaining the land in its existing open use, and, the contribution or potential contribution the site makes to the Green Infrastructure Network, character and appearance of the area;
 - iv. the merits of protecting the site for alternative open space uses;
 - v. the location, size and environmental quality of the site;
 - vi. the relationship of the site to other open space areas in the locality and similar uses within the wider area;
 - vii. whether the site provides a link between other open areas or as a buffer between incompatible uses;

- viii. that it can be demonstrated that there is a surplus of open space and that alternative provision of equivalent or greater community benefit will be provided in the area at an appropriate, accessible locality; and
 - ix. the merits of the proposed development to the local area or the Borough generally.
- 5.13 Proposals for development on Primarily Open Space land that contribute to both the Green Infrastructure Network and the nature and purpose of the open space may be deemed acceptable by the Borough Council.
- 5.14 **Policy 15: Climate Change** – All new development must have regard for the need to be climate-resilient and applications will be judged against the criteria set out within the Policy.
- 5.15 **Policy 16: Natural Environment** – All development proposals will be expected to demonstrate how the use of natural resources will be minimised; protect and, where appropriate, enhance the quality of natural resources; demonstrate the Borough’s distinctive landscape is protected, enhanced or restored; avoids any significant adverse impact on skylines and hill features; where possible retain trees; and contribute to the achievement of relevant Worcestershire Biodiversity Action Plan targets where appropriate.
- 5.16 **Policy 17: Flood Risk Management** – All sites in excess of 1ha in size or located in Flood Zone 2, 3a or 3b will require a comprehensive Flood Risk Assessment.
- 5.17 **Policy 18: Sustainable Water Management** – All development proposals will require the inclusion of Sustainable Drainage Systems to manage surface water runoff on site.
- 5.18 **Policy 19: Sustainable Travel and Accessibility** – Transport will be coordinated to improve accessibility and mobility, so that sustainable means to travel, reducing the need to travel by car and increasing public transport use, cycling and walking are maximised.
- 5.19 **Policy 20: Transport Requirements for New Development** – A Transport Assessment will be required where it is considered that development will have a significant transport implications. A Travel Plan will be required alongside all developments which generate significant amounts of movement. All proposals should incorporate safe and convenient access arrangements in their design for all potential users.
- 5.20 **Policy 22: Road Hierarchy** – The Borough Council will continue to endorse and pursue the principles of a structured road hierarchy and will seek to extend such principles to any new development.

- 5.21 **Policy 28: Supporting Education, Training and Skills** – Developers of all major applications will be required to provide education and training or funding towards the provision of education and training for local residents.
- 5.22 **Policy 29: Broadband and Telecommunications** – All developments should make provision for the service infrastructure required at the design stage of any proposal suitable for occupiers of all development.
- 5.23 **Policy 36: Historic Environment** – Designated heritage assets including listed buildings, structures and their settings; conservation areas; and scheduled monuments, will be given the highest level of protection and should be conserved and enhanced. Applications for development affecting any heritage asset or its setting must be accompanied by a heritage statement. The level of detail should be proportionate to the significance of the heritage asset and the likely level of impact.
- 5.24 **Policy 39: Built Environment** – All development in the Borough should contribute positively to the local character of the area, responding to and integrating with the distinctive features of the surrounding environment, particularly if located within a historic setting.
- 5.25 **Policy 40: High Quality Design and Safer Communities** – Good design should contribute positively to making the Borough a better place. A number of criteria are provided that new development schemes will be expected to demonstrate.

Summary

- 5.26 The schemes compliance with the relevant Local Policy is assessed in greater detail in the next section (Section 6). To summarise however:
- The proposed development would deliver 216 new dwellings in a sustainable location, that would contribute towards meeting the 5YHLS and objectively assessed need for 6,400 new homes in the Borough between 2011 and 2030 as set out in Policy 4;
 - The proposed development will provide a mixture of dwellings and house types including a policy compliant level of affordable housing, in accordance with Policies 4 and 6;
 - A number of supporting documents are provided as part of the application which address technical considerations such as highways, flooding and drainage, air quality, biodiversity and landscape;

- These documents have informed the design of the proposed development, in order to provide a high-quality development in-keeping with the context of the Site.

Supplementary Planning Documents

Planning Obligations for Education Contribution (2007)

- 5.27 The Planning Obligations for Education Contributions Supplementary Planning Document (SPD) advises on planning obligations that will be sought from new residential development in respect of education. For developments of over 100 dwellings, Worcestershire County Council will assess site's individually and seek to negotiate with the applicant.

Open Space Provision Supplementary Planning Document (2007)

- 5.28 The Open Space Provision SPD outlines the open space typologies, the calculation for open space provision and the level of on-site or off-site developer contributions.

High Quality Design Supplementary Planning Document (2019)

- 5.29 The High-Quality Design SPD seeks to guide developments to achieve a high standard of design. The SPD sets out design principles and requirements that the Council have when assessing planning applications.

Five Year Housing Land Supply

- 5.30 Redditch Borough Council's April 2021 Report on Housing Land Supply sets out the Council's latest published calculation of its five-year housing land supply.
- 5.31 The Report found that, at 1st April 2021, the Borough Council could only demonstrate a 2.61 year housing land supply.

Evidence Base

Redditch Borough Council Open Space Needs Assessment (2009)

- 5.32 An Open Space Needs Assessment (OSNA) for Redditch Borough was first published in 2005. The assessment was updated in 2009 due to alterations to ward boundaries, developments on open space, the preparation of the Core Strategy and in order to make it PPG17 compliant. Within the 2009 OSNA, open space is classified and mapped. Size, level of access, site name, and hierarchy is also recorded. Within the Open Space Needs Assessment, the Site is classified as a sports facility.

5.33 Section 8 provides the specific provision levels of each type of open space within each Borough / Ward. The specific provision levels for the Abbey Ward are copied below:

Borough/ Ward Standard	Allotments	Amenity Open Space	Churchyard and Cemeteries	Civic Square	Parks	Play Areas	Schools and School Grounds	Semi- Natural	Sports Facilities
Abbey	0.75	1.18	1.56	0.33	12.28	0.07	1.05	1.03	13.59

Red	Under provision against Borough Standard
Green	Surplus provision against Borough Standard

5.34 The section goes on to advise that only Abbey Ward stands out as offering a consistently greater provision than the Borough standards for most categories of open space. Commentary is then provided on the main forms of open space, with any links with national benchmarks identified.

5.35 In terms of sports facilities, Worcestershire Playing Pitch Strategy states that:

- There is a need to protect existing facilities;
- A need to overcome identified deficiencies;
- Enhance the existing provision.

5.36 With regards to the Borough's performance, some wards such as Abbey were noted as having a high proportion of sports facilities.

5.37 Section 9 includes a quality-audit sample review of all of the open space designations in the Borough. Following the assessment of 45 sites within the Open Space Needs Assessment in September 2004, a sample of 13 sites were selected for review. The Site was not selected for review as part of the sample sites.

Redditch Borough Council Playing Pitch Strategy 2011-2016

5.38 The Redditch Playing Pitch Strategy aims to provide a strategic approach to future playing pitch provision. It provides baseline data on the current quantity and quality of all the playing pitches in Redditch and identifies gaps in provision. The study encompasses an assessment of all formal outdoor playing pitch facilities including golf.

Addendum to the Open Space Needs Assessment (2014)

- 5.39 This Addendum illustrates corrections to the Open Space contained within each ward of Redditch Borough, following the original Open Space Needs Assessment that was undertaken. The corrections are made where new Open Space has been created through planning applications and also where there have been losses to Open Space.
- 5.40 The Conclusion to the Addendum advises that Abbey Ward saw an increase in Open Space provision of 1.214ha, albeit still had an overall deficit in Open Space provision.

Neighbourhood Planning

- 5.41 There is not a designated Neighbourhood Plan area covering the Site.

National Planning Policy*National Planning Policy Framework*

- 5.42 The most recent version of the National Planning Policy Framework ('NPPF') was published by the Government in July 2021.

Delivering Sustainable Development

- 5.43 At the heart of the NPPF is a presumption in favour of sustainable development. Paragraph 7 states that '*the purpose of the planning system is to contribute to the achievement of sustainable development*'.
- 5.44 Paragraph 11 requires development proposals which accord with the Development Plan to be approved without delay. Where the Development Plan is absent or silent or policies of relevance are out-of-date, planning permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies in the Framework, or if any specific policies indicate otherwise at Footnote 7. None of the criteria at Footnote 7 are applicable to the proposed development.
- 5.45 Where policies were adopted prior to the publication of the NPPF, due weight should be afforded to them according to their degree of consistency with the Framework.

- 5.46 Sustainable development has three overarching objectives, being economic, social and environmental, and planning should therefore perform each of these roles (Paragraph 8). These objectives are mutually dependant and should not be considered in isolation.
- 5.47 When considering the sustainability of the proposal, in the context of the three objectives the proposal is considered to have significant benefits as follows:
- *Economic Role:* The proposed residential development of 216 dwellings will contribute to the economy through local construction jobs during the construction phase of the development. The use of local tradesmen and services along with materials will help to sustain the economy through supply chain multipliers. Once the dwellings have been built and occupied, the new residents will contribute to the local economy through additional expenditure in local shops and services.
 - *Social Role:* The delivery of 216 dwellings has the potential to make a substantial contribution to the creation of a strong and vibrant community. The development will provide a number of social benefits for the existing / future residents of Sawston including the provision of new areas of formal and informal public open space for use by the wider community. 65 of the proposed dwellings will be affordable which will help to increase the range and type of dwellings and tenures available within the locality, contributing to the creation of a mixed / balanced community.
 - *Environmental Role:* The proposed development has been carefully designed in order to make a positive contribution to the built environment. A high-quality landscape is proposed which includes multi-functional green infrastructure (GI) such as children's play areas, informal recreational areas, SuDS features, buffer planting, retained trees, woodland copse, hedgerows and other habitat creation.
- 5.48 Paragraph 47 advises that planning applications should be determined in accordance with the Development Plan, unless material considerations indicate otherwise.

Delivering a Sufficient Supply of Homes

- 5.49 Paragraph 60 sets out the Government's objective of '*significantly boosting*' the supply of housing. Local Planning Authorities should deliver their full objectively assessed needs for both market and affordable housing and to consider any needs that cannot be met in neighbouring Authorities.
- 5.50 Local Planning Authorities should identify and update annually a five year supply of available housing land as a minimum (Paragraph 74).

5.51 Annex 2 of the NPPF details the different tenures of affordable housing to include the following:

- Affordable rent;
- Starter homes;
- Discount market sale; and
- Other affordable routes to home ownership.

Promoting Healthy and Safe Communities

5.52 Planning decisions should aim to achieve healthy, safe and inclusive places which promote social interaction, are safe and accessible and enable and support healthy lifestyles (Paragraph 92).

5.53 Paragraph 93 requires policies to ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.

Open Space and Recreation

5.54 Paragraph 99 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) The development is for alternative sports and recreational facilities, the benefits of which clearly outweigh the loss of the current or former use.

Promoting Sustainable Transport

5.55 The NPPF requires significant development to be focussed on locations which are or can be made sustainable through limiting the need to travel or offering a genuine choice of modes of travel (Paragraph 105).

5.56 Development proposals should ensure appropriate opportunities to promote sustainable modes of transport can be accommodated; safe and suitable access can be achieved for all users; the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance; and any significant impacts arising from the development can be mitigated to an acceptable degree (Paragraph 110). Paragraph 111 goes on to state that development should only be refused on highways

grounds where there would be an unacceptable impact on highway safety or the residual cumulative impact on the highway network would be 'severe'.

- 5.57 Paragraph 112 sets out a number of criteria for development proposals including giving priority to pedestrian and cycle movements, addressing the needs of those with disabilities and reduced mobility and be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

Making Effective Use of Land

- 5.58 Paragraph 124 requires Local Planning Authorities to support development which makes efficient use of land. This should take account of the need for different types of housing, the prevailing character of an area and the importance of securing well designed and attractive places.
- 5.59 Paragraph 125 advises that area-based character assessments, design guides and codes and masterplans can be used to help ensure that land is used efficiently whilst also creating beautiful and sustainable places.

Achieving Well Designed Places

- 5.60 The creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (Paragraph 126). Paragraph 130 sets out a number of criteria that new development will be expected to achieve including good architecture, layout and appropriate / effective landscaping; establishing or maintaining a strong sense of place; and creating inclusive and accessible places.
- 5.61 Paragraph 131 considers the important contribution that trees can have to the character and quality of the urban environment. Where possible, planning policies and decisions should ensure that trees are incorporated into new developments and new streets are tree lined.
- 5.62 Paragraph 134 advises that permission should be refused where development is not well designed and fails to reflect local design policies and government guidance on design, taking account of any local design standards or supplementary planning documents such as design guides and codes.

Meeting the Challenge of Climate Change, Flooding and Coastal Change

- 5.63 The NPPF requires the planning system to support the transition to a low carbon future (Paragraph 152).
- 5.64 When determining planning applications, Local Planning Authorities should take account of layout, building orientation, landscaping and massing to minimise energy consumption (Paragraph 157).
- 5.65 Paragraph 159 advises that inappropriate development in areas at risk of flooding should be avoided by directing development away from high-risk areas. When determining planning applications, local planning authorities should ensure flood risk is not increased elsewhere (Paragraph 167). Applications for major development should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate (Paragraph 169).

Conserving and Enhancing the Natural Environment

- 5.66 The NPPF recognises the role of the planning system in contributing to and enhancing the natural and local environment (Paragraph 174) across a number of technical disciplines.
- 5.67 Paragraphs 179-181 seek to minimise the impact on biodiversity and geodiversity. In particular, priority habitats and protected species should be preserved.
- 5.68 Paragraphs 183-185 require new development to be appropriate to its location in order to prevent unacceptable risks from pollution and require sites to be appropriately remediated. Where a site is affected by contamination, the developer is responsible for ensuring that the development is safe.
- 5.69 The next Section (Section 6 – Planning Assessment) will review compliance with the Development Plan and NPPF in further detail.

6.0 PLANNING ASSESSMENT

6.1 This Section outlines our assessment of the proposed development against the planning policy context and issues identified in Section 5. Reference is made to the findings of technical reports submitted to accompany the Planning Application in order to avoid unnecessary repetition.

Decision-Making Approach

6.2 The Development Plan is the starting point for the determination of planning applications. Determination is required to be in accordance with the Plan unless material considerations indicate otherwise. For this application, the Development Plan comprises the Borough of Redditch Local Plan No 4 (RBP), which was adopted in January 2017.

6.3 Paragraph 11 of the NPPF advises that where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, planning permission should be granted unless:

- i. The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
- ii. Any adverse impacts of doing so would **significantly** and **demonstrably** outweigh the benefits, when assessed against the policies in this Framework taken as a whole (our emphasis added).*

6.4 This Section will demonstrate that there are no clear reasons for refusing the proposals and that the benefits of the development would outweigh any adverse impacts, and should therefore be approved.

Principle of Development

6.5 The Application site is identified to be 'Primarily Open Space' within the Redditch Local Plan. Policy 13 (Primarily Open Space) is therefore considered to be relevant. The proposed development has accordingly been assessed against the criteria within the policy, which it is advised will be taken into account when considering applications on Primarily Open Space:

- i. "The environmental and amenity value of the area;**

As set out in the accompanying submission documents, the amenity value of the site is limited as it is in private ownership and not publicly accessible. The site is currently a manicured golf course – the environmental value of the site is therefore compromised by this.

ii. **The recreational, conservation, wildlife, historical, visual and community amenity value of the Site;**

These matters are covered in the LVIA and the open space assessment however it is proposed that the golf course is retained as an 18 hole course in a reconfigured layout which as confirmed in the golf course report, remains appropriate for the leisure offer. The application seeks to provide bio-diversity net-gain, thus enhancing the wildlife offer and will actually provide public access to an area which is not currently open for public access beyond the golf course members.

iii. **The merits of retaining the land in its existing open use, and, the contribution or potential contribution the Site makes to the Green Infrastructure Network, character and appearance of the area;**

Matters relating to the character and appearance of the area are covered in the LVIA. Whilst there is Green Network to the north and south of the site, the site because it is not publically accessible, does not serve a role in linking the two areas and thus its redevelopment for residential use does not fulfil a role in this regard.

iv. **The merits of protecting the Site for alternative open space uses;**

As set out in the open space assessment, there is sufficient open space within this Ward and given that the site is in private ownership, it is considered that a qualitative improvement to the open space would be better achieved through enhancements to Arrow Valley Country Park.

v. **The location, size and environmental quality of the Site;**

vi. **The relationship of the Site to other open space areas in the locality and similar uses within the wider area;**

As set out in the open space assessment, it is considered that there will remain sufficient open space in the ward; that this site serves of little benefit to the wider community and that its loss will not have a significant adverse effect on the open

provision as a whole for the local community. Indeed with the provision of open space (open to existing residents) on site and the potential for enhancements to Arrow Valley Country Park, a better offer overall can be achieved.

vii. **Whether the Site provides a link between other open areas or as a buffer between incompatible uses;**

As set out above, the site is not currently publicly accessible and therefore it does not serve as a functioning link between open spaces as there is no way of accessing the site beyond being a member of the golf club. The site does not serve as a buffer between incompatible uses.

viii. **That it can demonstrated that there is a surplus of open space and that alternative provision of equivalent or greater community benefit will be provided in the area at an appropriate, accessible locality; and**

The open space report confirms that there is a surplus of open space in the ward and the Applicants are willing to make an appropriate contribution towards enhancements to Arrow Valley Country Park which will provide a qualitative enhancement to open space provision in the area in an existing accessible and well used location.

ix. **The merits of the proposed development to the local area or the Borough generally"**

The application is submitted on the back of a significant housing land supply shortfall and one which is not easily capable of being rectified due to the quantum of Green Belt land in the Borough. The weight therefore to be given to the delivery of housing is significant and in the context of the loss of part of a private open facility; with the course remaining as 18 holes; with the quantum of open space being high in the ward and a willingness by the Applicant to contribute towards enhancements to Arrow Valley Country Park, it is considered that the development offers significant merit to the Borough.

6.6 The site is also identified as a Sports Facility within the Redditch Borough Council Open Space Needs Assessment for which it is noted there is a surplus of this type of space within the Abbey Ward (which the Site is within).

Design

6.7 The NPPF requires that developments are of a good design, and this is echoed in local planning policy.

6.8 A Design and Access Statement has been prepared to accompany this planning application, which provides further information in respect of the design rationale for the proposed development .

6.9 A co-ordinated and iterative approach to design, planning and technical input has been adopted throughout the design process. This has enabled a responsive, positive, and sustainable design proposal to be developed for the site.

6.10 The vision and design principles that are within the DAS have assisted in guiding the design process. These design principles include:

- To deliver a logical framework of streets and spaces, relating to the sites existing features;
- To provide new footpath links connecting Hither Green Lane and The Abbey Golf Course to the areas of open space within the development which were previously inaccessible;
- To provide 216 new homes of which 30% will be affordable;
- Deliver a mix of housing, offering 1–4-bedroom properties, comprising a range of house types, such as terraced, detached and semidetached properties;
- Perimeter block form, with a clear distinction between the public and private realm;
- Active frontage onto all streets, pedestrian routes and open spaces;
- Integrated movement for pedestrians, cyclists and vehicles, including well overlooked links to Hither Green Lane, bus stops and the local area;
- Recognisable built forms and features to enhance legibility throughout the scheme, including feature spaces, landmark buildings, co-ordinated building materials and high quality landscaping to help define the street scene;
- Large open spaces which are well located and overlooked;
- Landscaped green edges with a variety of planting options which enhance biodiversity;
- An environment which is not dominated by cars, using soft landscaping to mitigate the visual impact of parked cars; and
- The provision of sustainable drainage.

- 6.11 In light of the above, the proposed development is considered to be in full accordance with the adopted Local Plan design policies and Section 12 of the NPPF.

Provision of Affordable Housing

- 6.12 Policy 6 'Affordable Housing' requires all developments of 11 or more dwellings to provide a 30% contribution towards the provision of affordable housing. On-site provision should be made and must incorporate a mix of dwelling types and sizes, which reflect the Site's characteristics.
- 6.13 The policy also sets out that the Borough Council will seek to negotiate the mix of affordable housing tenures on individual schemes taking account of local needs, the housing mix in the local area and the impact on viability. A mixture of social rented and intermediate housing / affordable rent will generally be sought.
- 6.14 It is noted that the most recent SHMA report for the area (2012) concludes a high demand for smaller 1 and 2 bedroom affordable properties constituting around 80% of demand. It is considered that the scheme will make a significant contribution towards meeting affordable housing need.

Transport and Access

- 6.15 Paragraph 111 of the NPPF advises that *"development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*
- 6.16 A Transport Assessment and Travel Plan have been prepared by Mode Transport Planning and are submitted in support of this planning application.
- 6.17 In terms of road safety, the Transport Assessment considers that there are not any inherent highway safety issues on the local highway network surrounding the site which would likely be exacerbated by the development.
- 6.18 The proposed vehicular accesses for the Site will be taken from Hither Green Lane via new priority crossroads junction along the Site's eastern frontage. The proposed access will provide a 5.5m wide carriageway with 10m corner radii and 2m footways on both sides of the carriageway. Pedestrian access at the junction will be supported by the provision of an uncontrolled crossing facility, in the form of dropped kerbs / tactile paving.

- 6.19 Further to this, an emergency access has also been provided onto Dagnell End Road at the western end of the Site frontage, in the form of a 3.7m wide shared emergency / pedestrian link, with retractable bollards to prevent private vehicle access.
- 6.20 It is proposed to provide a new pedestrian route between the Site and Dagnell End Road. A new section of footway will also be provided on the southern side of Dagnell End road, within the existing highway boundary. To the south and west pedestrian / cycle connections will be provided with the existing NMU connection which runs alongside the River Arrow and connects with Birmingham Road immediately north of the river over-bridge. This will provide a direct and attractive route to the local facilities and amenities in the vicinity of the Site.
- 6.21 In terms of the level of parking required on Site, parking will be provided in accordance with the submitted Parking Management Plan (Drawing Ref: ME-24-35), which has been prepared taking into consideration the relevant standards set out within WCC's Streetscape Design Guide (2020). The Plan demonstrates that a combined number of 573 parking spaces will be provided, including 452 on plot parking spaces, 112 garage spaces, and 9 unallocated visitor spaces.
- 6.22 A Travel Plan (TP) has been prepared for the Site in order to reduce dependency on the car and encourage sustainable modes of transport such as walking, cycling and public transport. The TP sets out specific measures to be implemented, which includes awareness initiatives and infrastructure provision. It includes an Action Plan which includes a summary of the RTP commitments. These consist of measures such as appointing a travel plan co-ordinator and preparing a Travel Information Pack.
- 6.23 Given the above, the proposed development is considered to be in general accordance with Policies 19 and 20 of the Redditch Borough Local Plan and Section 9 of the NPPF and is therefore acceptable.

Ecology

- 6.24 This Planning Application is supported by a number of ecology surveys comprising:
- Updated Preliminary Ecological Appraisal (July 2020);
 - Preliminary Bat Roost Assessment (September 2021);
 - Badger Survey (September 2021);
 - Great Crested Newt Habitat Suitability Index Assessment and eDNA Survey (
 - Reptile Survey (September 2021);

- Breeding Bird Survey (November 2021); and
- Construction Ecological Management Plan (November 2021).

Ecological Appraisal

- 6.25 An updated Ecological Appraisal has been prepared by Middlemarch Environmental Ltd, following a Preliminary Ecological Appraisal in June 2016. The survey comprised an Extended Phase 1 Habitat Survey including initial observations of any suitable habitats, or any evidence of protected / notable species. Following this a number of recommendations were provided, with further survey work undertaken in relation to several protected species (as set out above). The key points taken from the survey are as follows:
- 6.26 The appraisal set out that the key ecological features on site in relation to the proposed development are woodland and scattered trees, hedgerows and standing water, which have the potential to support a range of protected species.
- 6.27 On the basis of the findings of the preliminary ecological appraisal, the following recommendations are made:
- Consultation with Natural England in relation to any potential impacts on Dagnell End SSSI and Windmill Naps Wood SSSI;
 - A Construction Ecological Management Plan should be prepared as the proposed works could potentially indirectly impact the River Avon, Abbey and Forge Mill Ponds and Dagnell Brook which are designated as Local Wildlife Sites;
 - A Biodiversity Enhancement Strategy should be produced;
 - Biodiversity Enhancement Measures should be incorporated into the landscaping scheme;
 - New lighting should be designed to minimise potential disturbance to sensitive receptors such as bats, owls and otters;
 - A preliminary roost assessment should be undertaken of mature trees and buildings which may be impacted by the works;
 - Any excavations that need to be left overnight should be covered or fitted with mammal ramps;
 - Vegetation and building clearance should be undertaken outside of the nesting bird season;
 - A Method Statement should be included within the CEMP in order to ensure that works do not cause New Zealand Pigmyweed to spread.

- 6.28 Further surveys were also recommended in relation to badger, great crested newt, reptiles and breeding and wintering birds.

Preliminary Bat Roost Assessment

- 6.29 A Preliminary Bat Roost Assessment was undertaken on the 8th of June 2021 and 5th of July 2021 by Middlemarch Environmental Ltd. The PRA assessed the potential for the existing buildings and trees on Site to support roosting bats.
- 6.30 In terms of the findings, multiple features were identified around the building located in the north-eastern corner of the Site, which could potentially be used by bats. Due to the height and location, many of these features could not be inspected and therefore the building was therefore classed as having high potential to support roosting bats.
- 6.31 Fourteen trees on Site were found to possess potential roosting features. Of these, ten trees had high potential to support roosting bats and four trees had low potential to support roosting bats. Only two of the trees classed as having high potential to support roosting bats will be impacted by the proposed development: T2 and T13. Two other trees adjacent to T2 are to be removed and removal in close proximity may have an indirect impact on any roosting bats if present. T13 is required to be removed to facilitate the work.
- 6.32 The Proposed Site Layout shows that areas of plantation woodland, hedgerows, dense scrub and scattered trees are to be removed to facilitate the proposals as well as some of the smaller ponds. It is proposed to enhance the retained areas of woodland, create a new SUDS feature and plant wildflower grassland within the Site. Habitat connectivity will be retained around the Site boundaries. Therefore, the impact on foraging and commuting habitat is likely to be temporary with eventual beneficial effect.
- 6.33 Details of the recommended mitigation measures can be found in Section 6 of the accompanying Preliminary Bat Roost Assessment. A summary is provided below:
- Additional surveys of the building on Site, as well as trees T2 and T13 which are identified as having high potential to support roosting bats;
 - Soft felling of a number of trees on Site, identified as having low potential to support roosting bats to ensure that any bats that may have colonised these trees in the interim since the initial inspection are not harmed during the proposed tree removal works;

- Any new lighting should be carefully designed to minimise potential disturbance and fragmentation impacts on sensitive receptors;
- Habitat enhancement through the provision of bat boxes at suitable locations within the Site.

Badger Survey

- 6.34 A survey for badger was undertaken in May 2021, by Middlemarch Environmental Ltd. The purpose of the survey was to determine the presence / absence of evidence of badgers on and adjacent to the Site.
- 6.35 The survey Site was subject to a comprehensive walkover assessment for the presence of any badger field signs. No evidence of badger was recorded within the Site during the walkover survey and no setts were recorded within an accessible 30m of the Site. However, badgers are known to be present in the wider area as a deceased badger was reported in the desk study on the road adjacent to the Site and a pit latrine was noted in the wider golf course off site.
- 6.36 As no evidence of badger activity was found on Site, no further survey or mitigation works were considered to be required at this stage. As badgers are mobile and may pass through the Site, several recommendations are provided at Section 6 of the report, including:
- Covering any excavations on Site at night, or fitting suitable mammal ramps in order to prevent any badgers / mammals becoming trapped. Covering any open pipework with an outside diameter greater than 150mm at the end of each day;
 - Remain vigilant during Site clearance;
 - Clearance of the rabbit burrow on Site being undertaken sensitively to ensure that no animals are injured or harmed during the works;
 - Should no work have commenced within 12 months, the survey should be updated.

Great Crested Newt Habitat Suitability Index Assessment and eDNA Survey

- 6.37 A HSI Assessment and Environmental DNA (eDNA) survey was undertaken on the 28th of June 2021 by Middlemarch Ecology Ltd.
- 6.38 Reference to Ordnance Survey mapped data indicated the potential presence of up to 21 ponds within a 500m radius of the Site, five of which were located within the Site boundary. Of the 21 ponds identified, it was not possible to survey two of the ponds due

to access constraints. One pond no longer existed and four ponds were dry at the time of survey. The remaining ponds were therefore the focus of the assessment.

6.39 eDNA testing was carried out at a total of nine ponds within a 250m radius of the Site. The result of all ponds was negative indicating an absence of great crested newt DNA within the ponds at the time of the survey.

6.40 Due to the number of ponds in close proximity to and on the Site, it was considered likely that common amphibians are present on Site and a low number of common toad were recorded during the reptile surveys completed on site. The unmanaged grassland habitats, woodland, hedgerows and scrub habitat to be removed are suitable for foraging and sheltering amphibians. Four of the on Site ponds are also proposed to be removed to facilitate the development. It is anticipated that these populations can be preserved on Site post development, however they may be at risk from construction activities and becoming road casualties.

6.41 Details of the recommended mitigation measures can be found in the accompanying Great Created Newt Habitat Suitability Index Assessment and eDNA Survey. This includes:

- The survey data is valid for two years from the survey date. In the unlikely event that a great crested newt is found during development works, all works must cease immediately;
- Management of grassland habitats should continue up until the commencement of works to ensure they don't become tussocky and more favourable for common amphibians;
- The removal of ponds should be completed in the amphibian active season, avoiding the breeding season. Ponds should be drained prior to removal and a mesh screen should be used if a pump is required;
- Kerb and gully pot design should follow best practice guidance to allow amphibian movements across the Site and prevent capture in gully pots;
- The proposed SUDs feature should be designed to support some permanent water and provide opportunities for breeding amphibians. The creation of new wildlife ponds or enhancement of retained ponds within the wider golf course should also be considered. Amphibian hibernaculum and log piles could be created within the areas of open space on Site to provide additional opportunities for sheltering amphibians as well as small mammals and invertebrates.

Reptile Survey

- 6.42 Middlemarch Environmental undertook a reptile habitat assessment and presence / absence survey between 8th of June 2021 and 7th July 2021.
- 6.43 During the reptile surveys a low population of grass snake were found with an estimated 0.6 individuals per hectare of suitable habitat on Site. The Site does not meet any of the criteria to qualify as a Key Reptile Site as defined by Froglife (1999). A small number of common toad were also identified during the surveys and habitats on Site are suitable for common amphibian species.
- 6.44 The proposed development will result in the permanent loss of suitable habitat for grass snake in the form of unmanaged scrub and grassland and woodland edge habitats as well as the proposed removal of four ponds. However, given the low population size, mobility of the species and suitability of the surrounding habitats it is considered that adverse impacts can be avoided through the implementation of reasonable avoidance measures which will also be applicable for the protection of common amphibians.
- 6.45 Full details of the recommended mitigation and compensation measures can be found in the accompanying report, however they are summarised as:
- If works do not commence within 12 months, an updated assessment of the Site should be completed;
 - The Reasonable Avoidance Method Statement included in chapter 6 of the report must be adhered to during the works;
 - The provision of habitat enhancement e.g. a large compost heap could be created in a sunny location such as the edge of the open space in the south of the Site. These should not be disturbed when they may be used by egg-laying grass snake between June and September, inclusive, or during the winter months (between November and February).

Breeding Bird Survey

- 6.46 Middlemarch Environmental Ltd undertook a breeding bird survey at the Site to assess the suitability of the habitat at the Site for breeding birds.
- 6.47 During the breeding bird survey visits, a total of 36 bird species were recorded, of which 21 were confirmed to have bred or probably did so. The remaining 15 birds were all

observed using the habitats within the Site or overflying it but were not considered to be breeding within the study area.

- 6.48 Overall, the survey states that the Site was considered to contain a moderate variety of different habitats such as scrub, woodland and standing water, which enabled the Site to support a range of breeding bird species, including some of conservation concern.
- 6.49 A number of recommendations were accordingly provided to ensure that the Site continues to provide suitable habitats / features for breeding birds.

Construction Ecological Management Plan

- 6.50 A Construction Ecological Management Plan (CEcMP) has been prepared in order to minimise the potential impact of the construction phase of the development on the existing ecology of the Site and ensure works proceed in accordance with current wildlife legislation.
- 6.51 The plan contains a summary of the existing ecological baseline of the proposed development Site and how this could be impacted (Chapter 2), and information with respect to the measures that will be implemented during the construction phase to ensure the protection of ecologically sensitive habitats within the Site (Chapter 3). Chapter 4 provides details of the practical measures that will be implemented to ensure that biodiversity features on the Site are protected throughout construction.
- 6.52 As such, the impact of the proposed development on ecology has sought to be minimised, and mitigation measures will be provided in accordance with the supporting survey work that has been undertaken.

Landscape and Trees

Trees

- 6.53 A Preliminary Arboricultural Assessment was undertaken in June 2020 and July 2020 by Middlemarch Environmental Ltd. An Arboricultural Impact Assessment was then carried out in September 2021, also by Middlemarch Environmental Ltd.
- 6.54 Following consultation with the Local Planning Authority, Redditch Borough Council, it was established that Area Tree Preservation Order Redditch New Town No.1 TPO (1965) applies to all trees present within the assessment area that are older than 54 years old. There are no Conservation Area designations that would apply to any trees present on, or in close proximity to the assessment site.

- 6.55 Forty-three individual trees, twenty-nine groups of trees, one woodland and four hedgerows were surveyed. The proposed development has been designed so that, where possible, existing trees are retained, however to accommodate the development, it will be necessary to remove a number of trees within the Site.
- 6.56 The proposed development will ensure the retention and incorporation of the key trees across the Site, prioritising those considered to be of high and moderate retention value, alongside new tree planting as part of the wider landscape strategy. The proposed development will however require the removal of twelve trees, eleven groups and three hedgerows as well as the partial removal of ten groups, a hedgerow and one woodland.
- 6.57 Three individual trees identified for removal were considered to be unsuitable for retention. One individual tree identified for removal was considered to be of moderate retention value. Suitable new tree planting will be required to offer an adequate level of mitigation for its loss. The remaining trees proposed for removal were all considered to be of low retention value. However new tree planting will be required to mitigate for any loss in visual amenity that does result from their removal.
- 6.58 The AIA summarises the impact of the proposed development as being unlikely to significantly impact the visual amenity of the local area as a result of the proposed tree removal as the trees proposed to be taken out are those considered to have low retention value and their loss should be mitigated by the proposed tree planting in time. The proposed works are unlikely to impact significantly upon the long-term health of retained trees.
- 6.59 The AIA sets out a number of recommendations to ensure the protection of retained trees including the use of construction exclusion zones, tree protection barriers and ground protection measures. It also advises carefully selecting the species included within the proposed landscaping scheme in order to reduce the risk of trees being removed in the future.
- 6.60 The proposed development is therefore considered to accord with Policy 16 of the South Redditch Local Plan and Section 15 of the NPPF.

Landscape and Visual Impact

- 6.61 Policy 13 of the Local Plan advises that proposals which would result in the total or partial loss of Primarily Open Space will not normally be granted planning permission unless it

can be demonstrated that the need for development outweighs the value of the land as an open area.

- 6.62 Policy 16 goes on to state that in terms of the natural environment and landscape, proposals will be expected to demonstrate the Borough's distinctive landscape is protected, enhanced or restored. Proposals should also be informed by and sympathetic to the surrounding landscape (part iii).
- 6.63 A Landscape and Visual Appraisal (LVA) has been prepared in support of the application by SLR Consulting Ltd (SLR). The report identifies the potential landscape and visual receptors which could be affected by the proposed development, and then assesses the potential level of effects which could occur for these receptors if the development were to take place.
- 6.64 The LVA confirms that the Site is not covered by any statutory or non-statutory designations for landscape quality or value, such as National Parks, Areas of Outstanding Natural Beauty or Special Landscape Areas, nor is it crossed by or adjacent to formal rights of way. The Site does include trees covered by a Tree Protection Order (TPO). Land to the north of Dagnell End Road is designated as Green Belt.
- 6.65 The appraisal concludes that the effects of the proposed development upon landscape receptors would be localised and concentrated upon the Site itself. There would be a major/moderate and negative effect upon the enclosed tall grassland and scrub receptor, and a moderate and negative effect on the enclosed golf fairways. The hedgerow network would also undergo moderate and negative effects. In character terms the landscape effects would be focused on a transition area on the settlement edge, and these effects would be moderate and negative. For the landscapes outside of the site the effects would be minor or moderate/minor and neutral in nature.
- 6.66 In summary, the negative landscape effects of the proposed development would be focused upon part of the application site, but landscapes outside of the site would experience only relatively minor and neutral effects. The development would therefore comply with Policies 13 and 16 of the Redditch Local Plan and Section 15 of the NPPF.

Flooding and Drainage

- 6.67 A Flood Risk Assessment (FRA) and Drainage Strategy has been prepared by Travis Baker (September 2021) and is submitted as part of the application. The assessment considers

the impact of the development in respect of flood risk and provides a drainage strategy for the development.

- 6.68 Following a review of the Environment Agency's online flood maps, the majority of the site is within flood zone 1. However, a small proportion of the site to the south is located within flood zone 2 and 3. As the area proposed for development is located within flood zone 1, the sequential test is not required and the principle of residential development from a flood risk perspective is acceptable.
- 6.69 There are minor instances of surface water flooding identified within the Site, and this is mainly limited to existing low points and small ditches, ponds and pools within the Site. These ponds and pools will become redundant following the development of the site.
- 6.70 Infiltration testing has been carried out in selected trial pits. The test results show that no significant infiltration was recorded over a timed period of approximately 4 hours and therefore, it is considered that surface water from the development could not be effectively discharged by soakaway drainage and an alternative drainage solution will need to be sought.
- 6.71 A surface water drainage scheme has been designed to incorporate Sustainable Drainage Systems (SuDS) and pollution prevention measures. The required surface water storage will be in the form of an attenuation basin with a vortex flow control to provide flow restriction. The basin will be maintained by a bespoke management company under the requirements of the Flood and Water Management Act.
- 6.72 With regards to foul drainage, foul water generated by the proposals will be directed to the existing combined 375mm public sewer. A sewer capacity assessment was requested by Severn Trent Water to assess any impact on the existing network. The assessment will not have an impact on the development. The SUDS maintenance strategy and full correspondence with Severn Trent Water is found within the appendices of the FRA.
- 6.73 The FRA concludes that the proposed development will not be subject to significant flood risk nor will it increase the flood risk to the surrounding area.

Air Quality

- 6.74 An Air Quality Assessment has been prepared by BDW Trading Limited and is submitted with this planning application.

- 6.75 The assessment considers construction phase dust impacts and operational phase road traffic emissions.
- 6.76 A qualitative construction phase dust assessment was undertaken in accordance with the relevant guidance and measures were recommended for inclusion in a DMP to minimise emissions during construction activities. With the implementation of these mitigation measures the impact of the construction phase dust emissions is considered to be 'not significant', in accordance with IAQM guidance.
- 6.77 A detailed road traffic emissions assessment was carried out to consider the impact of development-generated road traffic on local air quality at identified receptor locations. The development was not predicted to result in any new exceedances of the relevant air quality objectives and the impact of the development on local air quality was predicted to be 'negligible' in accordance with IAQM and EPUK guidance.
- 6.78 Pollutant concentrations were predicted across the proposed development Site. Concentrations of NO₂, PM₁₀ and PM_{2.5} were all predicted to be below the relevant air quality objectives and therefore the Site was considered to be suitable for the proposed residential use with regard to air quality.
- 6.79 As such, the proposed development is considered to comply with Policy 19 of the Redditch Local Plan and paragraph 186 of the NPPF.

Noise

- 6.80 A Noise Assessment has been prepared by Air & Acoustic Consultants Limited (September 2021) and is submitted with this planning application.
- 6.81 The assessment concludes that the existing noise climate at the Site is dominated by traffic on the nearby B4101 road with minor additions from the A441 and the car park of the Meadow Farm Inn. The baseline noise environment was established by way of a baseline noise survey, which consisted of two unattended measurements over a 7-day period.
- 6.82 In terms of any potential construction impacts, assuming the appropriate mitigation measures are employed, these can be minimised to the point that any impacts would be temporary in nature and result in the LOAEL.
- 6.83 The Noise Assessment advises that predictive modelling of the potential noise impacts from the existing noise environment has been undertaken to understand the operational

phase impacts. The predictions show that under reasonable worst-case conditions the most exposed properties closest to the B4101, A441 and the Meadow Farm Inn have the potential to exceed the BS8233 and WHO criteria for internal noise levels.

- 6.84 However, with the inclusion of the proposed mitigation measures (which includes a suitable glazing and ventilation strategy and noise barriers) the potential for adverse impacts is considered to be low, which would also represent NOEL to LOAEL.
- 6.85 As such, the amenity of residents would be not harmed from noise and the Site is accordingly considered to be suitable for the development in accordance with Section 15 of the NPPF.

7.0 DRAFT HEADS OF TERMS FOR A SECTION 106 AGREEMENT

7.1 Paragraph 57 of the NPPF confirms that planning obligations should only be sought where they meet all of the following tests:

- a) Necessary to make the development acceptable in planning terms;
- b) Directly related to the development; and
- c) Fairly and reasonably related in scale and kind to the development.

7.2 The following draft Section 106 heads of terms are anticipated:

- 30% on-site affordable dwellings are proposed to be provided as part of the development, and it is envisaged that this will be secured through a Section 106 Agreement;
- Any other reasonable and directly related requirements as may be shown to be necessary based on detailed evidence of need.

7.3 Any requests for S106 contributions will be considered by the Applicant in light of the provisions of regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 and paragraphs 55-57 of the NPPF.

8.0 SUMMARY AND CONCLUSIONS

8.1 This Planning Statement has been prepared by Barton Willmore LLP on behalf of David Wilson Homes Mercia to assess the planning issues arising from a Planning Application for the following description of development at Land off Hither Green, Redditch:

'Residential development (Class C3) with a vehicular access point onto Hither Green Lane, play areas, public open space including footways and cycleways, sustainable urban drainage systems and all other ancillary and enabling infrastructure'

8.2 The proposed development comprises 216 dwellings at Land off Hither Green Lane, Redditch, including a range of dwelling types, sizes and tenures throughout the Site.

Decision Making Approach

8.3 The Development Plan consists of the adopted Redditch Borough Plan, which was adopted in 2017.

8.4 As detailed above, Redditch Borough Council are unable to demonstrate a five-year housing land supply. The Council's latest assessment sets out a 2.61-year housing land supply. As such, the Site abenefits from the presumption of sustainable development outlined at Paragraph 11 of the NPPF.

8.5 It is clear that the polices pertaining to the supply of housing are out of date and that the tilted balance is engaged. Thus it remains to consider whether, in accordance with paragraph 11 of the NPPF, the harm significantly and demonstrably outweighs the benefits. In the case of Redditch Borough, it is important to note that the majority of the greenfield land in the Borough is Green Belt and therefore this represents one of the only larger scale opportunities to rectify any shortfall.

8.6 The proposed development therefore represents a significant opportunity to deliver the following economic and social and environmental benefits to Redditch and the wider area including:

- The delivery of 216 no. dwellings in an accessible, location, creating a sustainable residential development adjacent to the existing built form of Redditch;
- A contribution towards meeting the 5YHLS and objectively assessed need for around 6,380 dwellings in the District up to 2030;

- The provision of 65 affordable dwellings;
- A mixture of dwelling types comprising 1, 2, 3 and 4 bedroom dwellings will be provided to assist in improving housing choice within the local area;
- Promotion of development in a sustainable location which is well located for public transport connections and to promote pedestrian and cycle trips;
- A contribution to the economy through local construction jobs during the construction phase of the development. Furthermore, the use of local tradesmen and services along with materials will help to sustain the local economy through supply chain multipliers;
- The creation of 3.4ha of publicly accessible play areas and open space;
- Additional landscaping and planting throughout the Site; and
- Biodiversity enhancements across the Site.

8.7 The supporting technical documents submitted as part of the Planning Application have demonstrated compliance with the requirements of the adopted Local Plan and NPPF. In light of its compliance with the Local Plan and in the absence of overriding harm and taking into account the significant benefits arising from the proposed development, it is considered entirely appropriate to grant Planning Permission.