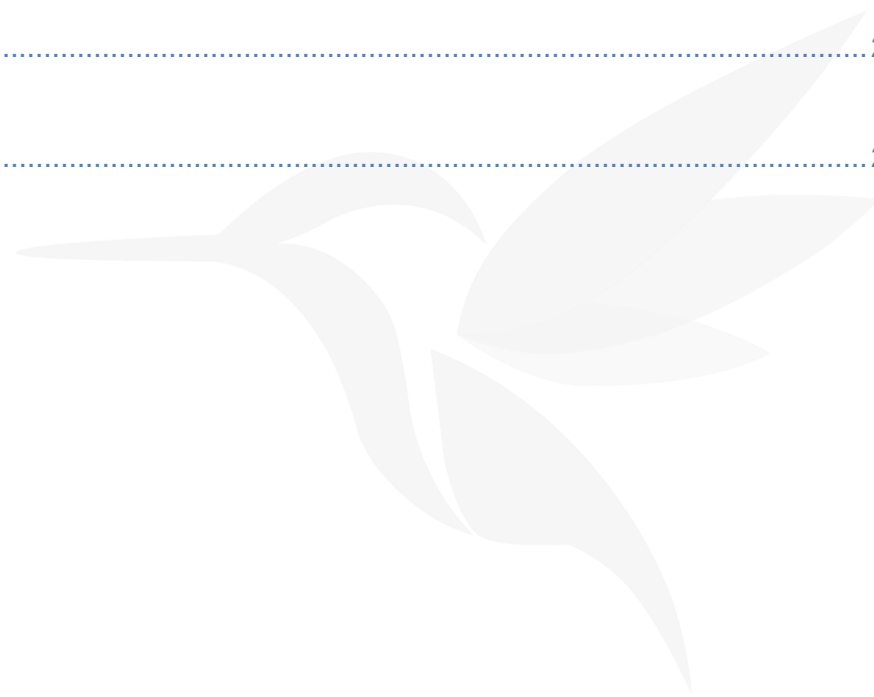


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Introduction

This document has been prepared North Redditch Communities Alliance (NoRCA) in response to the proposed development outlined in the above Planning Reference. It details our objections which we feel make a compelling case for the planning application to be refused.

We reserve the right to add further information in due course.

M P Jacobs
Chair

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11th February 2022



Executive Summary

Background

A full planning application was submitted on 13th December 2021 to Redditch Borough Council by David Wilson Homes for the development of 216 houses on land on and around the Abbey Park golf course. Shortly before the application was submitted, members of the golf club were informed by the Abbey Hotel; residents of Hither Green Lane received a leaflet summarising the developer's intentions. Given the full application status and the extent and magnitude of what is being proposed we are somewhat disappointed that the opportunity for further consultation has not arisen.

Although the timing of the application – just before the festive season break – was a potential obstacle to mobilising our challenge, residents of properties surrounding the Abbey Hotel Golf Course and in the immediate vicinity who will be significantly adversely affected by the proposed development, reacted swiftly in forming a strategic alliance through which their common concerns could be directed and articulated. The North Redditch Communities Alliance (NoRCA) was established through a local network of residents' representatives. It comprises over 1,000 residents in Hither Green Lane, Dagnell End Road, Bordesley, Church Hill North and the village of Beoley. We have come together through a shared interest in protecting the Green Infrastructure Network of the Borough; our primary objective being to conserve, sustain and enhance the environment in which we live.

We are grateful to the Parish Councils of Alvechurch and Beoley for respectively formally opposing this application.

As a group, we are supportive of developing Redditch for the benefit of its residents, but we feel strongly that this is not best served by building more and more houses on green open spaces particularly when there is already sufficient land in the Borough set-aside to satisfy house building targets. More broadly, we firmly believe there is a growing sense of unease among residents across Abbey, Church Hill, Brockhill and Batchley, Beoley and Bordesley that the north of the Borough is becoming over developed; the loss of open space land is felt very strongly.

We are therefore heartened to learn that the key assumptions upon which the application is predicated – that Redditch has insufficient land allocated to new house building and is struggling to meet its build targets within Local Plan 4 (BORLP4) – are incorrect. The reality is that Redditch has a strong supply of land - the most recent figure provided by the Council is 8.9 years - and will achieve its new house building targets within the current plan period - as confirmed by the UK Government' Housing Delivery Test report of 14th January 2022.

The proposed development on green open space land is therefore superfluous and unnecessary. Redditch simply does not need the houses.

Should the proposed development be allowed to proceed the only parties that would benefit are the landowners and the developer – it would certainly not benefit the town of Redditch. The opportunistic development would generate additional environmental pollution, lead to increased traffic congestion, put further pressure on already stretched local services and infrastructure and devastate the green environment and habitats of wildlife.

Moreover, the planned housing is totally out of keeping with the properties immediately adjacent on Hither Green Lane, both in terms of style and layout. A density of 22 houses per hectare is being proposed, compared to that of 7.2 houses per hectare on Hither Green Lane.

An area in the south-west of the plan is labelled “Potential Future Access” which is assumed to indicate a further potential housing estate. Granting approval for the application will therefore give a free pass for future development and would be the thin end of a particularly inappropriate wedge.

It is NoRCA’s considered opinion that the proposed development will adversely impact residents’ general sense of well-being, security and belonging.

Please note that NoRCA is not a single-issue action group. We are united in our opposition to the proposed application – which we will continue to challenge if it is not completely rejected. However, we are supportive of the Council’s aspirations that encourages aspirational people to regard Redditch as an attractive place to live and work, to raise families and to set-up businesses. Going forward, we will seek to engage with and support the Council to help realise this.

NoRCA has undertaken a robust and thorough assessment of the documentation in support of the planning application. It considers that the proposed residential development is contrary to both National Planning Policy Framework and the Borough of Redditch Local Plan. For the following reasons the planning application should be **refused**:

Planning

- Redditch has a sufficient supply of housing land (8.9 years) - as confirmed in the latest 5YHLS (31st January 2022).
- Redditch has exceeded its requirements under the Housing Delivery Test published by the government on 14th January 2022.
- The Redditch Local Plan 4 is up-to-date and current.
- The application site is not designated for housing development.
- The application site is designated as “Primarily Open Space”.
- The site is not a sustainable location for further residential development.
- The site has potential flood and environmental impacts which will affect both the site itself and have wider impacts.
- The golf course is an important local facility and will be materially impacted by the proposed development.
- Having regard to the above, it is clear that the application conflicts with the Development Plan in a number of key aspects such that the provisions of Paragraph 11 (c) of the NPPF do not apply in support of this application. Moreover, these conflicts are such that the planning application would cause demonstrable harm to key aspects of the Development Plan and other material planning considerations such that planning permission should be refused.

Transport and Highways

- The additional number of vehicle journeys (over -1000 per day) will further add to the already heavily congested roads in the area, particularly the junction between the A441 and B4101
- The proposed residential development is not situated in a sustainable location as it does not offer a genuine choice of transport modes.
- The site will not reduce the need to travel by car.
- The proposed residential development does not provide for a safe and suitable access for all users.
- The impacts from the proposed residential development on the transport network cannot be mitigated against.
- There is an unacceptable severe impact on the operation of the road network.
- There are no measures to reduce the impact of the environmental impacts associated on the surrounding road network because of the additional traffic generated by the proposed residential development.

Environment & Biodiversity

- This Primarily Open Space is 'a valuable part of the Green Infrastructure Network' (BORLP4) providing an 'invaluable formal and informal recreational resource, is beneficial for nature and conservation and has a bearing on people's quality of life'.
- It makes an invaluable contribution to reducing the town's Carbon Footprint, fundamental to its Climate Change Emergency Declaration.
- The Environment Act 2021 will, before any construction commences, require evidence of a verifiable 10% biodiversity net gain over 30 years, commencing with a significant negative as the current green environment is destroyed by the estate built to replace it.
- Waste generation, chemical contamination, sewage, noise, light and air pollution will be significant (216 house estate : 600+ residents; 400+ vehicles; 300+ children).
- Wildlife habitat on the site is currently extensive including numerous roe deer, snakes including adders, rabbits, owls, birds of prey, bats, wildfowl, ducks, extensive bird life including owls and buzzards, foxes, badgers, freshwater fish (*Carp, Perch, Roach, Dace in abundance in pool at northern part of the site*) aquamarine and other small animals you would expect to find in the countryside. ~~but~~ These will largely disappear near a big housing estate with all the above pollutions.
- Established trees, longstanding hedgerows, numerous water features are all at severe risk, along with disappearance of the wide expanses of verdant grassland on the proposed site.
- The River Arrow Corridor Special Wildlife Site, which links onwards to a series of other similar sites along the river, on the edge of the proposed development will be at serious risk once threatened by increased population footfall, usage, and proximity of housing with associated contaminations, leading to almost total loss of riverside habitats.
- There will be Increased Surface Water Flood Risks on land that floods regularly after heavy rainfalls which are likely to increase with Climate Change.
- River Arrow pollution and dangers will arise from placing a large housing estate adjacent to the river with all sorts of rubbish and detritus ending up in the water.

- Fast flowing water and steep embankments, within 10 metres of the site, will pose a life-threatening hazard to children who will inevitably treat the river, its embankment and riverside woodlands as their play area. A further tragedy as occurred at the nearby Five Tunnels, must be avoided.
- The proposed development will deprive residents of the open space amenities to the detriment of their well-being.
- The extensive 'mitigations' recommended to alleviate the large number of environmental and biodiversity risks of proceeding with this application are just that: mitigations not eliminations. For example, using downward facing LED road lighting will be energy efficient but will still keep most wildlife away, as will lit up houses, continuous road traffic and general estate noise.

Golf

- The Golf course will reduce in length by around 500 yards, weakening its golfing challenge.
- The 18-hole course will be condensed and squeezed into smaller acreage.
- The reduced course will have a detrimental effect upon speed of play, lengthening playing time and escalating Health and Safety risks for players.
- The course will lose its “Championship Standard” status
- The course will cease to be one of Redditch’s primary leisure resources and attractions.
- During the 2+ years housing development and consequent re-design the course will be reduced to 10 playable holes – this is likely to result in a decline in membership and pay-and-play golfers; the opportunity for schooling and practice will be greatly reduced.
- During the development the club will be unable to attract Golf Societies; the golf packages that contribute significantly to hotel revenues will dramatically decline
- A precedent will be established for further developments on and around the golf course.

Legal

- The site is subject to a restrictive covenant imposed by the Commission for the New Towns when the land was sold to the golf course operator on 19th October 1990, preventing the land from being used other than as “a leisure centre, hotel, golf course and country club...”. Clearly, the proposed development will be in breach of that covenant and we have written to Homes England (as statutory successor to the Commission for the New Towns) to notify them of the application and to seek assurance that enforcement action will be taken if the proposed development commences.

Conclusion

NoRCA firmly believes the commentary above provides a compelling justification for the planning application to be refused.

As further information becomes available or is submitted in support of the application, we reserve the right to submit further supporting information.

The following sections provide more detail on each area.

Planning

The Borough of Redditch Local Plan No 4 (BRLP4) is now just five years old. A local plan review has commenced.

Planning decisions are required, under paragraph 11 of the NPPF, to apply a presumption in favour of sustainable development. In terms of decision taking this means approving development proposals that accord with an up-to-date development plan without delay.

In terms of establishing whether a development plan is up-to-date, a key test is set out in footnote 8 to paragraph 11 of the NPPF in that a five year supply of deliverable housing sites must be maintained or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75%) of the housing requirement over the past three years.

The Borough of Redditch can pass both tests in that the Housing Delivery Test published by the government in January 2022 confirms that Redditch Borough has delivered substantially above its housing requirement over the previous three years. The five-year housing land supply situation (5YHLS), as of 31st January 2022, confirms that Redditch Borough can demonstrate an 8.9 year's supply of deliverable housing sites.

The effect of this is to confirm that any decision on this application must be made in accordance with paragraph 11(c) of the NPPF. This states that development proposals that accord with an up-to-date development plan should be approved without delay subject to there being no other material impacts upon matters of significance.

Accordingly, the application should be considered against policies set out within the BRLP4. It will also be appropriate and pertinent to consider whether the proposed development also conforms with the three principles of sustainable development as set out in paragraph 8 of the NPPF.

With regard to the BRLP4, Policy 3 sets out the overall development strategy for the Borough. This seeks to bring forward all strategic sites (sites allocated in the Local Plan).

Policy 4 sets out the housing requirement for Redditch Borough between 2011 and 2030. It is against this policy that the Housing Delivery Test and 5YHLS is assessed.

The application site at Hither Green Lane is not an allocated housing site as set out in the BRLP4. Indeed, not only is it not an allocated housing site but it is also defined on the proposals map as Primarily Open Space to which Policy 13 applies.

Policy 13 notes that defined open space will be protected and, where appropriate, enhanced to improve the quality, value, multi-functionality and accessibility of the land. Furthermore, proposals which will result in the total **or partial** (our emphasis) 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. Applications for development on Primarily Open Space have to be assessed on this basis and have to take into account the following:

- (1) The environmental and amenity value of the area.
- (2) The recreational, conservation, historic, wildlife, visual and community amenity value of the area.
- (3) The merits of retaining the land in its existing use and the contribution it makes to the green infrastructure network and the character and appearance of the area.
- (4) The merits of protecting the site for alternative open space uses.
- (5) The location, size and environmental quality of the site.
- (6) The relationship of the site to other open spaces in the locality.
- (7) Whether the site provides a link between other open areas or between other compatible uses.
- (8) Whether it can be demonstrated that there is a surplus of open space and alternative provision of equivalent or greater community benefit to be provided elsewhere.
- (9) The merits of the proposed development to the local area or the borough generally.

Paragraph 13.5 of the BRLP4 confirms that all Primarily Open Space is a valuable part of the green infrastructure network of the borough and fulfils several functions such as protecting the environment, meeting recreational needs, providing wildlife habitats and maintaining an attractive townscape.

Paragraph 13.6 goes on to note that if proposals for development cannot demonstrate that the need for the proposed development outweighs the value of the open space, planning permission will **not** be granted.

Policy 16 relates to the natural environment and notes that this is a feature of Redditch Borough that makes it a special area. Policy 16 seeks to ensure that the natural environment is protected and enhanced wherever possible.

Policy 17 relates to the issue of flood risk and reaffirms national guidance in that development proposals that are located in areas that are subject to flood risk will need to demonstrate that there are no other reasonable locations for development in accordance with the “sequential test” and “exception test” set out in the NPPF.

Policy 19 addresses sustainable travel and accessibility issues noting that this is to be achieved by meeting development requirements in accessible locations and taking account of interactions between uses. This includes maximising accessibility to the use of public transport modes and delivering a comprehensive network of routes for pedestrians and cycles that is coherent, direct, safe, accessible and comfortable to use.

The BRLP4 also seeks to create a borough where businesses can thrive. This includes not only having the skills base sufficient to support and develop local businesses but also creating the type of environment and supporting facilities to attract and maintain businesses into the area.

The BRLP4 also seeks to enhance and promote the wellbeing of the entire Redditch community. This is to be achieved not only by enhancing specific cultural and leisure opportunities but also to ensure that there is a range of facilities that support existing and new communities and promote the role of healthy living. It is now well established that this means not only providing facilities for direct recreation in terms of sport and other leisure activities but also maintaining access to open space to enhance mental wellbeing.

Appendix 2 of the BRLP4, together with the Adopted Policy Map, reaffirms that the application site is not an allocated housing site and that, moreover, it is allocated in its entirety as Primarily Open Space.

Taking these factors into account, in the context that Redditch Borough has an adequate supply of deliverable housing sites and has no requirements to accelerate delivery of other housing sites through the recent Housing Delivery Test, it is clear that the policies seeking to protect the site’s designation as Primarily Open Space must be given considerable weight in the determination of this planning application.

The assessment of the impact on the golf course which has been undertaken and submitted as part of this representation clearly and unequivocally demonstrates that the loss of the Primarily Open Space area will have a considerable and detrimental impact upon the playability and attraction of the golf course. This is set out in the detailed and separate analysis of the golf course impact.

The golf course itself is a fundamentally important facility within Redditch as it is one of the few and better golf courses and the only 18-hole course available for “pay and play”. Furthermore, its association with the hotel makes it a very attractive facility for visitors to the area, both in terms of tourism and business.

As such proposals that affect, to a substantial and detrimental degree, the playability and attractiveness of the golf course can only be countenanced if there is a substantial requirement for the delivery of additional housing land sufficient to **override the very clear presumption that must exist in favour of retaining the golf course and POS in its existing form.**

No such housing need exists and, accordingly, the proposed development does not accord with the BRLP4 and thus fails to pass the clear test set out in paragraph 11(c) of the NPPF.

The proposal is also considered to fail the tests for sustainable development set out in paragraph 8 of the NPPF, as follows:

- **An Economic Objective** - In the absence of any shortfall or overwhelming requirement for additional housing land, the economic benefits to be derived from additional housing do not apply. **However**, the existing golf course is of material benefit to the Borough of Redditch in terms of offering access to a high-quality golf course to both the local community and visitors to the borough. This has clear economic benefit in terms of its place within the suite of facilities that the borough has to offer.
- **A Social Objective** - The requirement to achieve well designed spaces with accessible services to meet current and future needs and support the community's health, social and cultural wellbeing is clearly not met. The application site and location suffer from poor access to social and other infrastructure and fails as a sustainable and suitable location for further residential development.
- **An Environmental Objective** - Development is to protect and enhance natural and historic environment making effective use of land and improving biodiversity.

Overall, the proposed development is clearly unsustainable in terms of its impact upon local roads, the character and setting of the local area, its impact upon the local natural environment, the lack of local services and essential infrastructure.

Accordingly, there can be no presumption in favour of the proposed development and there is a clear and overwhelming conflict with the Adopted Development Plan such that planning permission must and should be refused.

Transport and Highway

North Redditch Community Alliance (NoRCA) has undertaken an initial review of the Transport and Highways documents in support of the above planning application, namely:

1. Transport Assessment (TA) - Dated October 2021; and
2. Residential Travel Plan (RTP) – Dated October 2021.

NoRCA is currently awaiting clarification regarding documents referred to in the TA. NoRCA is also undertaking relevant surveys and detailed technical analysis of both supporting documents, whereby further documentation in support of the objection will be submitted in due course.

The below provides a summary of NoRCA's objection in respect of Transport and Highway Issues and the key reasons why NoRCA consider that the Land West of Hither Green Lane planning application should be refused.

Significant Inaccuracies within the Transport Assessment

Section 1.1.1 of the TA states that the transport and highway advice given to the applicant is in relation to an “outline planning application”. This is at odds with the planning application submitted which is for a “full planning application”. This could explain why the TA is found wanting in a number of critical areas.

At section 3.8.3 it states that bus services are accessible on the A441 (Birmingham Road) within c.500 distance (c. 6-minute walk) of the site which can be accessed via pedestrian links and footway provision. The c.500 m is measured from the edge of the site, when a measurement is taken to the centre of the site the distance is more like 750 metres. Taking measurements from a proposed development site access point exaggerates the sustainability of the development site.

Within section 3.9 of the TA the distances to local services and facilities are set out in Table 3.2 to show the range of facilities within a distance of 2.5 km. The distances set out in the TA are taken from the edge of the site which underestimates the true distances residents will be required to walk. Distances are usually taken from the centre of the site to accurately reflect the true walking distances and when a true distance applied an additional 250 plus metres should be added to the distances set out in section 3.9. The effect of this inaccuracy is discussed further below.

Table 3.2 refers to Nunnerley of Redditch (Garden Centre). The garden centre is not open to the public and a site visit would have confirmed this. Notwithstanding this the business is now no longer trading.

Within Table 3.2 the distances to St Stephen's CE CRST Academy and Trinity High School & Sixth Form Academy are stated. Schools within Redditch and neighbouring Bromsgrove are organised in a three-tier system consisting of First, Middle and High Schools, whereby Table 3.2 omits the distance to the nearest Middle school. The Table also omits the distance to the nearest GP surgery.

Within Table 5.1 reference is made to the trip rate as derived from the TRICS database, with the TRICS output given and set out in Appendix E. The TRICS trip rates set out in Table 5.1 are different to the TRICS output given in Appendix E.

Section 6.4. discusses the screening process used to determine the junctions which should be assessed within the TA. The TA states that the screening process is based on the traditional DfT Guidance for Transport Assessment (GTA) approach to assessment. It goes on to say that whilst the GTA guidance has been replaced it is commonly accepted that GTA still represents industry best-practice and remains relevant.

The TA then selects junctions for assessment based upon threshold levels of 3%, 5% and 10% of development traffic relative to background traffic levels. The process of screening junctions for assessment as referred to in the TA is not set out in the GTA. Section 4.92 of the GTA clearly states that:

“If the TA confirms that a development will have material impact on the highway network, the level of impact at all critical locations on the network should be established. A particular example of material impact would be a worsening of congestion. In congested areas, the percentage traffic impact that is considered significant or detrimental to the network may be relatively low (possibly below the average daily variation in flow) and should have been determined in discussions with the relevant highway authorities. For the avoidance of doubt, the 1994 guidance regarding the assessment thresholds of 10 per cent and 5 per cent levels of development traffic relative to background traffic is no longer deemed an acceptable mechanism, since it creates an incentive in favour of locating development where high levels of background traffic already exist.”

Finally, within the TA’s conclusion, section 7.2.2 refers to a “TS”, this being a Transport Statement, and not as stipulated a TA. One can only assume that the review and audit process of the TA is therefore lacking.

The inaccuracies in the TA, as set out above, need to be taken into account when considering the appropriateness of the planning application and the suitability of the proposed residential development.

The Site is NOT Sustainable and Lacks Mode Choice

The statutory transport policy and best practice guidance relevant to the sustainability of the proposed development are clearly set out in the National Planning Policy Framework (NPPF) dated 2021 and the Borough of Redditch Local Plan (BRLP) adopted in 2017. In summary, both the national and local planning policies collectively seek to ensure that any residential development is located to ensure residents and visitors are provided with genuine modal choice by situating development in locations that reduce the need to travel, reduces average journey lengths and benefits from local infrastructure to enable use of modes of transport other than the single occupancy private car.

Having carefully reviewed the TA and RTP and assessed the accessibility of the proposed development site for walking, cycling, bus services and rail services, NoRCA have come to the conclusion that the TA is misleading level of accessibility is extremely poor and the site would not offer a genuine choice of sustainable transport modes.

Walking

Guidance on the preferred maximum walking distances to amenities is given in the Chartered Institution of Highways and Transportation (CIHT) document, "Providing for Journeys on Foot" (2000). The Guidelines indicate that a walking distance of 400m is acceptable for trips to local shops, with 800m being the preferred maximum. The acceptable walking distances for trips to work and school are given as 1000m, whereby a preferred maximum walking distance of 2000m is identified for these purposes within the guidance. The Manual for Streets (MfS) reinforces this advice, stating that "walkable neighbourhoods" should have a range of facilities within 800m (a 10-minute walk).

It is best practice to take measurements from the centre of developments to obtain a realistic reflection of potential walking and cycling distances. Taking measurements from the access point to the development site exaggerates sustainability. Taking Table 3.2 within the TA and applying a correction for the distances from the centre of the site, the only amenity within an acceptable walking distance is the Marks and Spencer Food Store. Other amenities are at the maximum walking distance whereby the potential to walk to these destinations diminishes. Sainsburys, the Town Centre and schools are all beyond the preferred maximum walking distance and will therefore not be attractive to walking trips.

Along with walking distances, the pedestrian facilities provided for pedestrians must also be considered. Within section 3.7 the TA discusses the locations of 3 potential pedestrian routes residents could use. These are discussed in more detail below.

Firstly, the TA refers to the southeast of the proposed residential site where there are publicly available paths. The paths referred to are public Rights of Ways (PRoW) which are not surfaced or lit. They are open to the elements and are basically muddy tracks. These can only be used as daytime leisure facilities for ramblers and cannot be included as routes for promoting the sustainability of the site. This also applies to the PRoW north of Dagnell End Road towards Rowney Green.

Secondly, immediately to the south of the proposed residential development there is a publicly accessible path which provides a connection from Hither Green Lane through the golf course to connect with the A441. Whilst the path is tarmacked and lit, the lighting is intermittent, and residents are required to walk over 400 metres from the houses in Hither Green Lane to the A441. The footpath is not conducive to residents walking in the dark or bad weather. As such the footway connection cannot be seen as a suitable proposition for encouraging the walking mode.

Finally, the TA mentions that the existing footway provision along Dagnell End Road is limited. However, pedestrians are required to walk in the highway or on the grass verge and as such there are no safe pedestrian facilities to the north of the proposed residential development. To overcome this the applicant is proposing to provide a new section of footway between the proposed emergency/pedestrian access, onto Dagnell End Road and the existing footway provision near to the Meadows Farm Public House access. Whilst this appears an improvement to the existing pedestrian facilities it should be noted that the section of road is 60mph and the footway therefore will not be lit. High vehicle speeds, traffic noise and the absence of lighting are factors that will have a negative influence on the perception of the attractiveness and safety of the footway. It can therefore be contended that the footway will be of limited value in increasing the sustainability of the site by encouraging residents to walk.

In summary it would appear that the TA is overstating the potential sustainability of the site in respect of walking. The level of walking provision is very limited and it is asserted that the proposed improvements are insufficient to encourage potential future residents to walk and help the site to become sustainable in transport terms.

Cycling

Cycling can potentially be a substitute for a short car journey. The CIHT document, Planning for Cycling, states:

'The majority of cycling trips are for short distances, with 80% being less than five miles and with 40% being less than two miles. However, the majority of trips by all modes are also short distances (67% are less than five miles, and 38% are less than two miles); therefore, the bicycle is a potential mode for many of these trips (DfT, 2014a).'

An assessment of the level of cycling accessibility is given in the TA at section 3.7.10 to 3.7.15. The TA states that there are a number of cycle routes which can be accessed from the site. In addition, it states that there are both on and off-road cycle routes which link to a variety of amenities. In order to access these routes, the TA notes that cyclists must use the existing lit and tarmacked surface route between the A441 and Hither Green Lane. The TA also states that:

"Cyclists may (NoRCA emphasis) be required to dismount along these routes (between the A441 and Hither Green Lane) when accessing the Birmingham Road (A441) from the site."

The route it talks about is around 2m wide and therefore not suitable or safe as a shared cycle/pedestrian facility. It follows therefore that there are no appropriate cycle routes to encourage cycling using the existing facilities and nothing to encourage potential residents to cycle and help the site to become sustainable in transport terms.

Bus services

The TA asserts that nearest bus stops in the vicinity of the site are located immediately adjacent to the site on Hither Green Lane at The Abbey Hotel and Dagnell End Road (c.300 metres to the west of the Hither Green Lane / Dagnell End Road junction). It also states that bus services are limited with two services serving the bus stops, the S83 and S55 services. Both of these services are school buses and are not available for public use. As a result, it is clear that there are no public bus services adjacent to the proposed residential site.

The TA also advises that further bus services are accessible on the A441 (Birmingham Road) within c 500 metres distance of the site and can be accessed by the pedestrian link between the A441 and Hither Green Lane. The bus route serving these stops are extremely limited and offer one service a day on weekdays only. Furthermore, the distance of c 500 metres mentioned in the TA is incorrect with the distance to the centre of the proposed development site (true reflection) being over 700 metres.

The Chartered Institute of Highways and Transportation (CIHT) regard in their report "Buses in Urban Environments" that the planning of development sites should consider the walking distance to bus stops. CIHT recommended that the maximum walking distance to a bus stop where the interval between services is greater than 12 minutes should be 300m.

In the light of the above it is clear that there are no viable bus services within an acceptable walking distance to encourage residents to catch a bus instead of using their car.

Rail Services

The closest station to the proposed residential development site is Redditch Railway Station, which is located c.2.8km to the southwest of the site, accessible within an approximate 35-minute walk or 12-minute cycle. The station benefits from the provision of 18 bicycle storage spaces and therefore has the ability to attract cyclists from the proposed residential development site, however it is extremely unlikely that residents will undertake a 35-minute walk to access the railway station.

Summary

The TA concludes that *"the level of accessibility to the site is considered to be good with a range of opportunities for sustainable travel."* This is an extremely misleading statement as there are limited amenities within an acceptable walking distance of the proposed residential site. In addition there is a very limited range of both pedestrian and cycling facilities adjoining the site, there are no public bus services within an acceptable walking distance to a bus stop and the train station is 2.8 km distant from the site.

Given that the level of accessibility is extremely poor, there is very little opportunity to encourage residents to maximise the use of sustainable transport modes, thus contrary to NPPF paragraphs 110 and 112 as well as BRLP Policy 19 and 20.

Impacts on the Road Network

The policies relating to the traffic impacts resulting from the proposed residential development on the road network are acceptable is clearly set out in both the NPPF at paragraphs 110 and 111 and the BRLP at Policy 20. Of note is NPPF paragraph 111 which clearly states:

"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." (our emphasis)

Section 6.5 of the TA sets out the capacity analysis of all the junctions under consideration, namely:

- Junction 1 - Site access formed with Hither Green Lane;
- Junction 2 - Hither Green Lane / Dagnell End Road priority junction;
- Junction 3 - A441 / Dagnell End Road traffic signals; and
- Junction 4 - A441 / Odell Street/Weights Lane roundabout

With regards to Junction 3, the A441 / Dagnell End Road traffic signals, the junction has been modelled at a 2030 assessment year (termed the base assessment year) in order to take account of the junction improvements required under the Brockhill East Phase 3 mitigation works and the build out of the proposed residential development at Hither Green Lane. The results from the junction modelling at the 2030 assessment year are set out in the TA at Table 6.6. The junction modelling results have been extracted from the TA (for the pedestrian crossing facility called every signal cycle) and set out in the table below.

Arm	AM Peak Hour			PM Peak Hour		
	Degree of Saturation	Mean Max Queue (PCU) ¹	Ave delay/PCU (secs)	Degree of Saturation	Mean Max Queue (PCU)	Ave delay/PCU (secs)
2030 Base Assessment						
A441 (N)	106.6%	82	157	98%	50	65
Dagnell End Road	100.8%	13	105	111.7%	55	281
A441 (S)	99.8%	51	61	111.1%	127	232
Practical Reserve Capacity	-18.4%			-24.1%		
2030 Base + Development Traffic Assessment						
A441 (N)	112.3%	113	244	106.5%	89	168
Dagnell End Road	105.2%	22	150	114.2%	66	315
A441 (S)	103.4%	73	106	116.2%	159	308
Practical Reserve Capacity	-24.7%			-29.1%		

¹ PCU – is a passenger car unit (pcu) where one car is considered as a single pcu and a HGV/bus is 3 pcu's.

The junction modelling results clearly show that the junction will operate above its theoretical capacity (practical reserve capacity (PRC)) at the 2030 assessment year prior to the traffic associated with the proposed residential development being included in the analysis. The 2030 base assessment year shows that during the am peak hour the junction is 18.4% over capacity and at the pm peak hour 24.1% over capacity. With the inclusion of the proposed development the junction performance deteriorates significantly, whereby overcapacity figures markedly rise to 24.7% in the am peak hour and 29.1% in the pm peak hour. Even without the pedestrian crossing facility called at every cycle within the stage sequence the PRC still decreases by 5%.

The deterioration in the reserve capacity due to the proposed residential development is substantial and as a consequence leads to significant additional queues and delays to those already experienced at the junction. As set out below the proposed residential development at the Hither Green Lane site leads to a severe impact on the road network.

From the table above it can be seen that the mean maximum queue (mmq) on the A441 arm to the north of the traffic signal increases by 31 pcu's in the am peak hour and 39 pcu's in the pm peak hour. Taking a pcu as the length of a car in a queue as 6-7 metres, this equates to increasing the length of the existing queue by around 200 metres in the am peak hour and around 250 metres in the pm peak hour.

When examining the effect of the proposed residential development on the average delay to vehicles at the traffic signal junction it can be seen from the table above that at the am peak hour the average delay to a vehicle increases from 2.6 minutes to 4 minutes, a rise of almost 1 and a half minutes per vehicle. The pm peak hour shows an increase of 1.7 minutes in the delay experienced by each vehicle.

The impact of the proposed residential development on all arms at the junction is set out in the table below.

Arm	AM Peak Hour		PM Peak Hour	
	Mean Maximum Queue (Metres)	Ave Delay/veh (secs)	Mean Maximum Queue (Metres)	Ave Delay/veh (secs)
A441 (N)	+ 250 m	+ 84 secs	+ 200 m	+ 39 secs
Dagnell End Road	+ 60 m	+ 45 secs	+ 70 m	+ 34 secs
A441 (S)	+ 150 m	+ 45 secs	+ 220 m	+ 76 secs

The TA dismisses the deterioration in the capacity of the A441/Dagnell End Road traffic signal junction, together with the increase in queue lengths and delays, as a “*relatively minor impact at the junction*” (section 6.5.20 of the TA) when this is clearly not the case. When the additional traffic generated by the proposed residential development is added into the junction, the impact is significant and considered severe and not “relatively minor”.

The TA also assesses the impact of the development on the A441/Odell Street/Weights Lane roundabout (Junction 4), whereby it states that the roundabout will operate with sufficient reserve capacity at the 2030 assessment year with the proposed residential traffic included. Whilst this may be the case (detailed analysis still to be undertaken), the modelling of the roundabout undertaken does not take account of traffic blocking onto the roundabout as a result of the queues from the A441/Dagnell End traffic signals. Queues are currently observed on the A441 from the traffic signals through the roundabout on a regular basis, thus affecting the capacity of the roundabout. At the 2030 base assessment with the development traffic included the queue length from Table 6.6 of the TA reveals a mean maximum queue of almost a kilometre in the pm peak hour. Without the development it is 700 metres which is often the observed case. The distance between the traffic signals is around 300 metres.

The modelling of both junctions linked together to reflect the “blocking back” effect is missing from the TA. This is a serious omission.

In summary the cumulative impacts as a result of the Hither Green Lane proposed development on the road network can only be seen as being severe. **As a result, the proposed residential development is contrary to the National Planning Policy Framework paragraph 111 and the Borough of Redditch Local Plan Policy 20.**

Environmental Impacts

As a consequence of all the additional traffic and queues and delays resulting from the proposed residential development there will be a detrimental impact on the environment along the A441 and Dagnell End Road and in particular:

- Air pollution;
- Noise pollution; and
- Community Severance.

There appears to be no assessment within the transport supporting information of the environmental effects on the highway network due to the introduction of additional traffic onto the highway network, particularly for environmentally sensitive locations.

It is well recognized that there are already high levels of air pollution currently being experiencing from vehicles and traffic queues on the A441 Birmingham Road, which will only be exacerbated by all the additional traffic and queues resulting from the proposed residential development. There are no measures within the TA which will help reduce the impact of the air pollution problems associated with traffic generated by the proposed residential development. The impact of air pollution should have been addressed within the supporting information and therefore does not accord with the Government’s “Clean Air Strategy of 2019”.

As with air pollution the level of traffic noise has increased unreasonably along the A441 with the increase in speed of traffic, excessive increase in HGV's (a seven-fold increase has been experienced over the last 5 years) and the continual degradation of the road surface. It has been shown by research that traffic noise can have a serious impact on people's health and the A441 through Bordesley Village is no exception. There are no measures within the TA which will help reduce the impact of the environmental problems created with the noise associated by traffic generated by the proposed residential development. The impact of noise pollution should have been addressed within the supporting information and is not in line with the Government "Noise Action Plan for Roads 2019".

Finally, Bordesley Village due to the increase in road traffic, HGV's and speed of traffic on the A441 has a transport related community severance issue. This issue is regarded as the cumulative negative impact of the presence of the A441 and motorized traffic on the perceptions, behaviour, and wellbeing of people who use the surrounding areas or need to make trips along or across the A441.

As with other environmental related issues the increase in traffic levels, HGV's and traffic speed presents a barrier to the Bordesley village community, dividing it into two and disrupting access to goods, services, public transport and people. The speed of traffic and amount of traffic makes it particularly difficult for vulnerable residents to cross the road to access services, public transport and friends which leads to a reduction in accessibility to key services and damage local social networks and community 'cohesion'. It is well accepted that busy roads that pass-through settlements can have the effect of driving a wedge through a community by limiting people's ability or desire to move through that area. The additional traffic generated by the proposed residential development will add to the community severance issue and should have been addressed, it is seen as a serious omission from the supporting information.

The omission of any assessment of the transport related environmental problems associated with the increase in traffic from the proposed residential development is contrary to the Borough of Redditch Local Plan Policy 19 and Government Plans to curb air and noise pollution from road traffic.

Conclusion

Having undertaken a thorough and robust assessment of the Transport and Highway aspects of the planning application and based upon the analysis of the information submitted, NoRCA can conclude that the proposed development is contrary to both National Planning Policy Framework and the Borough of Redditch Local Plan.

For the following reasons the planning application should be refused:

- The proposed residential development is not situated in a sustainable location as it does not offer a genuine choice of transport modes.
- The site will not reduce the need to travel by car.
- The proposed residential development does not provide safe and suitable access for all users.
- The impacts from the proposed residential development on the transport network cannot be mitigated against.
- There is an unacceptable severe impact on the operation of the road network.
- There are no measures to reduce the impact of the environmental impacts on the surrounding road network as a result of the additional traffic generated by the proposed residential development.

Environment & Biodiversity

Policy and Regulatory

BORLP4 identifies the land as **Primary Open Space** and states that it can only be surrendered for housing if the development need outweighs the importance of retaining the open space. 'All Primarily Open Space is a valuable part of the Green Infrastructure Network of the Borough'.

As outlined above, the land subject to the application is not designated for development and there is no need for housing on this site at this time.

The Environment Act 2021 requires any developer to evidence a minimum 10% increase in biodiversity over the whole of the housing site measured over 30 years (*referred to as Biodiversity Net Gain*).

There appears to be little evidence in the application as to how this target will be attained.

Redditch Borough Council's Climate Change Emergency Declaration on 23 September 2019 placed actions to move as rapidly as possible towards Carbon net zero at the top of the agenda and needs to be evidenced in housing strategy and planning decisions in assessing this development proposal.

Current Contribution to Local Environment

The following summarises the present status of the environmental aspects the proposed development will dramatically and detrimentally impact:

- **Green Open Space** - part fallow field, part undeveloped (strip on southern side of Dagnell End Road) and part holes 2 and 3 of Golf Course
- **Trees** - numerous established including oak and white poplar with high canopies
- **Hedgerows** - bordering the north and west boundaries of the land and the west side of the golf fairway
- **Water Features** 1 Pool and 3 golf greenside/fairway Ponds (hazards) and 1 small Sud
- **Natural drainage**
- **Foul Water** limited production
- **Flooding Risk** normally minimal but high rainfalls lead to flooding on red clay soil and golf course closures
- **Natural surface water drainage** into the adjoining River Arrow
- River Arrow flows through **8 other Special Wildlife Sites** in the Borough from this location
- **Waste Pollution** nil (vegetation excepted)
- **Noise Pollution** - minimal
- **Light Pollution** - nil
- **Sewage disposal** – not applicable
- **Chemical Pollution** – nil
- **Clean air** – other than traffic and existing HITHER GREEN LANE residences

- **Carbon Footprint** – as Green Open Space contributes to Borough’s declared Climate Emergency
- **Carbon Neutral** – natural countryside – minimal contribution
- **Traffic** – none except noise and pollution from surrounding highways A441/B4101
- **Wildlife habitat** –
 - Roe Deer (*protected by Deer Act 1991*), snakes including Adders (*protected Wildlife & Countryside Act 1981*), rabbits, owls, birds of prey, bats, wildfowl, ducks, numerous bird life (including greater spotted & green woodpeckers, jays, redwings and multiple finch and tit species), butterflies, foxes, badgers, rodents, freshwater fish (*Carp, Perch, Roach, Dace in abundance in pool adjacent Dagnell End Lane*) aquamarine and other small animals you would expect to find in the countryside
- **Special Wildlife Site** (*RBC Local Plan 3*) identified the southern area of land adjacent to current hole 3 on edge of proposed development
- **Amenity land** usage by local residents of Hither Green Lane, Bordesley, Dagnell End Road and Church Hill; including walking, running and dog walking
- **Leisure Facility** via two golf fairways – identified and provided for the growing demand for leisure and golf pursuits by the New Towns Commission in the 1980s in seeking the provision of a 18-hole public golf course with leisure centre, fishing lakes and associated facilities surrounding 158 high value dwellings in Hither Green Lane
- **Golf Course Facility** – accommodates a growing demand to play golf, drawing players from all parts of the Midlands and further afield and utilising the local hotel facilities and surrounding attractions and businesses. Whilst the course has its own club members, they have no say on how the course is designed, managed or operated. It is also the only public 'pay and play' 18-hole golf course in Redditch
- **Population/ Residences** - none at present as Open Space
- **Pedestrian/cycle Access** (via footpath) to A441 and Redditch town. There is no footpath from HITHER GREEN LANE along Dagnell End Road to A441; the road is unlit.
- **Public Transport** There is no bus service from Hither Green Lane or Dagnell End Road to Redditch and nearby towns, Alvechurch, Bromsgrove. A school bus service operates twice a day during term time.

Impact of the Housing Development on the Local Environment

The following emphasises why the development application should be refused :

- **Loss of Primary Open Space** – an increase in the existing number of homes by 137% (from 158 on Hither Green Lane to 374) and their density will seriously impact the use and enjoyment of open space and surrounding areas as well as implications for general well-being and mental health of residents.
- **Potential loss of established trees** reducing privacy and living conditions for HITHER GREEN LANE residents. Construction of planned houses right under trees will dig out roots thereby destroying more trees than proposed.
- **Loss of hedgerows and wildlife habitat** – that will never be recovered.
- **Wildlife and aquatic implications** of 216 houses and access roads will be significant; pools will represent a safety hazard.

- **Increased Surface water** volume/drainage/soak away re-cycling and disposal issues. River Arrow's capacity and flood risk to other areas along its course is threatened. Proposed Sud enlargement represents a safety risk.
- **Water Supply** usage demands rainwater capture for domestic use other than drinking and personal hygiene.
- **Rainwater management** – requires/demands porous hard services returning water to the soil and provision of a substantial Sud (*reservoir*).
- **Volume Waste Pollution** - water, sewage, rubbish, detritus generated by 216 homes.
- **Greater Noise generation** from 216 houses, residents and traffic (400+vehicles).
- **Serious Light Pollution** emanating from new street lighting, residences and traffic which will also see wildlife be forced to flee from the current natural, sheltered green environment.
- **Air Pollution** - atmospheric carbon and other pollution generated by homes and vehicles.
- **Carbon Footprint impact** - significant, requiring provision of insulation, harnessing wind, voltaic panels and soil generated power and heat sources, electric car charging (*Environment Act 2021.*)
- **Embedded Carbon** from building materials and construction methods.
- **Contamination/Pollution** of River Arrow and Special Wildlife Site along the River Arrow Wildlife Corridor. 216 houses adjacent to the river will inevitably sadly see a large increase in the current relatively small pollution from rubbish discarded into the river and the large number of children (300+) on the estate will make the water, the riverside and the Wildlife Site a permanent play park and sadly see a large increase in rubbish and other pollutants in the water.
- **Child Safety** will be a high risk, not only because the adjacent riverside (and all along the golf course beyond) will be a children's play area but because the deep, often fast flowing waters and the proposed large deep Sud reservoir will together be a swimming and therefore drowning risk - children will be children even when dangers are clear and there was a death nearby at Five Tunnels a few years back
- **Traffic** – 216 homes will generate increased traffic noise and significant pollutions, elevate carbon footprint as well as use of land space with hard surfaces for parking vehicles. Increased volumes of some 400+ vehicles will access both Hither Green Lane and Dagnell End Road (in both directions).
- **Threat to all Wildlife** habitation of land hedgerows, trees and water features presented by buildings, increased population activity, and traffic and loss of green space. Potential reduction in appeal to residents and visitors to experience nature
- **Special Wildlife Site** – threatened by increased population footfall, usage, and proximity of housing, leading to total loss of riverside habitats (*River Arrow Corridor is a Designated Special Wildlife Site*).
- **Recreational Activity** will be removed, resulting in fitness and mental health issues as well as implications for living conditions and outdoor access enjoyed by Hither Green Lane, Bordesley and Dagnell End Road residents.

- **Loss of Leisure Land** - Two Golf Fairways and greens – current holes 2 & 3. It is proposed to incorporate two additional holes within the reduced course boundaries thus retaining 18 holes requiring a reduction in the length of the course, and its par status (*72 reduced to 70 anticipated - Subject to the approval of England Golf*) including a 500 metre walk between one green and the next tee, believed to be the longest distance gap in the country between one hole and the next.
- **Pedestrian and cycle access** to Redditch Town Centre schools and shops is limited to a narrow footpath alongside busy artery road A441. With no schools (and Beoley Primary School is already significantly over-subscribed), doctors or pharmacies within normal walking distances there will inevitably be a very large increase in vehicle traffic along the B4101 rural country lane and on the A441.
- **Detrimental Impact upon the living conditions** of residences and population of Hither Green Lane, Dagnell End Lane and Bordesley with loss of access to open space and nature and replaced by increased noise and other pollution.
- **Housing Density** – significant saturation compared to neighbouring residencies influencing the appearance and attractiveness of the locality, wildlife habitat as well as the loss of Open Green Space. The proposed development does not fit in to the layout, style and density of the area, totally inappropriate, out of character to the surrounding area and not proportionate (*Local Plan policy 2.2 'The location and scale of new development should.....reflect the services present, accessibility, character and local distinctiveness of each settlement' and policy 2.5 '.....appropriate and proportionate to their location, and adequately provide for the communities they serve'.*)
- **North Redditch with 50% of the Area has 93% of the population!** (*Local Plan para 1.24*) Increasingly vociferous voices throughout the town are saying enough is enough as the Green Infrastructure Network is being reduced every year as the north of the borough increasingly becomes an urban sprawl and the 'Green' disappears from the 'Green Infrastructure Network so proudly marketed by the town.
- **Increased Flood Risk** on what is a Flood Risk zone 3 which floods regularly already after heavy rainfalls which will increase because of Climate Change. The current surface through-flow will be massively increased from the surface run-off of a 216 house estate and subsequent groundwater flow that the mitigating SuD will not be able to retain in downpours and the overflows will carry on down current 4th fairway of the golf course which will close it for many weeks each year. NoRCA has many pictures of Surface Water Flooding on and around the proposed development site, unmentioned in the planning application. Examples are shown at the end of this submission but many more are available across the years

Environmental Organisations

NoRCA would respectfully ask the Redditch Borough Council decision-makers to consider the following during their deliberations:

Council for the Protection of Rural England

"We want the right development in the right places for the right reasons. We need to ensure that what is built is needed and the impact of the development does not outweigh the benefits"

Woodlands Trust

“Trees are the ultimate carbon capture and storage machines. The entire woodland ecosystem plays a huge role in locking up carbon, including the living wood, roots, deadwood, surrounding soils and associated vegetation at a rate of 400+tonnes of carbon per hectare with mixed native species.”

Royal Society for the Protection of Birds

“Trees, hedgerows, plants, vegetation and water courses are all important for birds and other species.”

Worcestershire Wildlife Trust

We must ensure that development decisions are made as environmentally sustainable as possible. They should aim to include wildlife in the decision-making process and to ensure that biodiversity is fully considered in every planning application.

David Attenborough

"Climate change is the greatest threat to our existence on this planet. Nobody is going to buy their way out of its effects"

Borough of Redditch Local Plan 4

“Redditch’s natural environment is one of its main distinctive features, the abundance of trees, wildlife and open spaces provide the urban area with a natural backdrop that makes it special. These policies will protect and enhance the natural environment and its flora and fauna, ensuring any risks to it are minimised so that the Town’s places are well served by a multifunctional Green Infrastructure network.

Conclusion

NoRCA considers that the proposed development will have a devastating impact on the environment and biodiversity, as outlined above; consequently, it is our considered opinion that the planning application should be refused.

Golf

Abbey Park Golf

The complex was built in 1970's at the instigation of the New Towns' Commission combining hotel accommodation and a housing development of 158 residences surrounded by an 18 hole golf facility that had to be open to the public.

The Hotel currently enjoys a 4 Star rating, one of only two in Redditch. It has 100 en-suite bedrooms, function suite, conference facilities and leisure club (gym, spa and indoor pool).

The golf course is currently promoted as a *"Championship Standard Course – The Best in the Midlands - upgraded and lengthened to challenge all abilities - originally designed and later re-designed by renowned course designer Donald Street and is located on a charming estate adjoining historic Bordesley Meadows"*.

The golf facility offers

- 18 holes par 72 – 6463 yards in length (3 x par 3, 12 x par 4 and 3 x par 5 holes) renowned as being an attractive and challenging course
- Inexpensive 'pay & play' as well as membership
- Hosted Seniors Masters Final in 2006, County and inter-club matches and competitions.
- 2 tier flood-lit driving range equipped with teaching bays.
- Has around 300 members and a high volume of golfing day visitors and golfing breaks.
- Tuition and low-cost opportunity to experience playing golf, development of skills and acquire of a golfing (WHS) handicap.
- Serves a growing demand to play golf, drawing players from all parts of the Midlands and further afield.
- The only "Championship Standard" 18-hole pay & play course within the Borough

Impact of Proposed Development

As this time (9th February 2022) plans detailing the proposed course re-design and re-configuration have not been provided by the Golf Club. NoRCA has therefore had to use Cornerstone Golf's "Planned Golf at Abbey Golf Club" document provided with the planning application as its sole point of reference in gauging the likely impacts which are summarised as:

- Loss of Leisure Land including the removal of two substantial golf holes which will be replaced by par 3's
- Reduction in course length of some 500 yards.
- 18-hole course will be condensed into smaller acreage.

- Detrimental effect upon speed of play producing longer playing times and escalating Health and Safety risks for players.
- Loss of Green Open Space Land - not identified as development land in Redditch Local Plan No. 4.
- Golf Course could not justify its “Championship Standard” status.
- The course could cease to be one of Redditch’s precious resources and attractions.
- This reduction in the quality of golfing facilities will coincide with a growth in demand for golf
- Loss of membership and a reduced ability to attract new golfers including juniors, seniors, casual and competent golfers and anybody unable to afford membership of a private club.
- Reduced playing and visitor experience.
- Adverse impact upon the Town’s Leisure, Tourism, Biodiversity, Environmental and Climate Change objectives.
- Reduction of the Hotel’s ability to host golf break and golf society business; the loss of revenue may jeopardize the long-term viability of the complex
- Detrimental to the promotion of the game of golf in the locality
- There is no provision for short game practice facilities
- The report states that the new configuration of the course will ‘Improve speeds of play’ but does not explain how this will happen. The introduction of two additional par 3 holes to replace the two longer holes that are lost will lead to increased ‘hold ups’.
- No reference as to how the golf club intends to restrict public access to the course. This problem will be significantly increased by the proposed 216 houses. There are already existing Health and Safety issues to be considered such as marking public access points.
- The extraordinary long walk from the 1st hole to the new 2nd tee (over a quarter of a mile) will encourage golfers to take a short-cut down Hither Green Lane thereby increasing the risk of road accidents as well as being disruptive to residents.
- During the development period (estimated as 2 – 3 years), the course will be restricted to ten holes. This is likely to result in an exodus of membership and a marked drop-off of Pay-and-Play golfers. The loss of golf package bookings will also adversely affect hotel bookings.

Deliverability

It is likely the housing development and associated changes to the golf course will take 2 – 3 years . NoRCA understands that during this time the course will be restricted to 10 holes. This will severely impact the golfing experience and is likely to result in a dramatic downturn in golfers choosing to play the course. Members are likely to leave and seek membership elsewhere; pay and play numbers will reduce, golf packages will fall away, golfing visitor numbers will decline. Revenues will be significantly impacted.

Conclusion

It is NoRCA’s considered opinion that the proposed development will have a significantly adverse impact on the Abbey Park golf and hotel facilities which will threaten its viability and sustainability. Should the development be granted permission to proceed it is likely that further erosion of the golfing facility will take-place over time. Redditch will thereby lose an important facility and asset. It is our considered opinion that the planning application should be refused.

Images



Current holes 2 and 3

The planning application proposes that these will be eradicated including many of the tress and hedgerows



Example of similar type and layout of proposed houses

The density proposed is **22** houses per hectare.



Example of the houses on Hither Green Lane in immediate proximity to the proposed development

The density is **7** houses per hectare

Houses typical of current Hither Green Lane



Aerial view of holes 2 and 3 and adjacent field

The planning application proposes that these areas will be built on in immediate proximity to current Hither green Lane properties



Flooding on hole 2 in 2021



Flooding on hole 4 in 2021



Deer on the course in 2021

