

Planning Application Ref: 21/01830/FUL

Residential development (Class C3) with vehicular access onto Hither Green Lane, play areas, public open space including footways and cycleways, sustainable urban drainage systems and all other ancillary and enabling infrastructure on land West Of Hither Green Lane Redditch Worcestershire B98 9AZ

FURTHER COMMENTS ON BEHALF OF NoRCA

The North Redditch Community Association (NoRCA) has considered the 24 additional and new documents submitted to the Council on 26th October 2022 and makes the following comments:

General

- These documents are yet another iterative change to the scheme. These changes, when taken together with other earlier changes, represent a substantial revision to the scheme such that there is a clear and substantive difference from the original submission. By way of example, the Planning Layout is now 'Version X'. This should be summarised by the applicants so that all consultees can identify the full changes and provide a full and comprehensive re-evaluation. We are concerned that the raft of iterative changes means that consultees may not have consulted on each small change but do now need to consult again on what are, together, major changes.

Design and Access Statement (DAS)

- The DAS provides a lot of general talk about Building for Life etc but there is then no proper evaluation of how these principles have been applied to this proposal.
- The DAS states - *By virtue of its position the site has excellent access to the various bus stops along the B4101 and A441. These have direct links to Birmingham so the development site is perfectly positioned to promote public transport use. The immediate area is served by a good range of bus services to various destinations, including:* • 143, Bromsgrove • X3, Kidderminster • 350, Worcester • 26, Stratford-upon-avon • 146/150, Birmingham
- Not one of these quoted bus numbers runs to/from Redditch Town Centre – as confirmed by the applicant's own Transportation Assessment (TA). The 146 to Birmingham was axed about two years ago and the 150 terminates in Kings Heath not 'Birmingham' (and via the Alexandra Hospital and the A435 not the A441). It appears that the error is derived from using a map of bus routes that is years out of date.
- The only buses that stop on the A441 opposite the Abbey and further up in Bordesley Village are the 182 and 183 but with only two services a day for each stop and, to quote Redditch Planning Department's comment, 'not at a time suitable for typical 9-5 employment commuting'.
- It is clear that the DAS is incorrect and totally misleading as to the current situation and, as noted, the applicant's own TA. It thus completely fails to sustain an argument in favour of the sustainability of the site and its ability to seek to reduce the need to travel and secure modal shift towards sustainable modes of travel.

- Redditch Planning Department also say that, with regard to pedestrian travel, all schools are way beyond reasonable walking distances, as are GP and Dental Practices. Nearest Primary school is Beoley at 3 kms with no continuous footpath but Hither Green Lane is no longer in its priority catchment area due to full roles at present so 5-9 year olds would now need to walk to one of the Redditch schools which are too distant to be considered within a safe and sustainable walking distance.
- The TA Mitigation Proposals at the Dagnell End Road / Birmingham Road junction are to assume that the existing scheme to be implemented as part of the Brockhill Phase 3 application by Persimmon Homes will be enough to cope with the additional traffic generated by the development. However, the TA statistics and assessment show very clearly that the 2030 Base plus Batchley existing layout will be massively over capacity in all 3 directions even before the Hither Green Lane proposals are included.

Drainage

- The 3 technical documents state that flows from the housing downpipes and guttering would be flowed to existing heavily watered areas beyond the housing estate including the tree copses behind 173 HGL (and many others) and the grassed area beyond; also using the existing drainage ditch north-south down the centre of the golf course. The key problem with this is that water running off concrete and tarmac will move entirely and immediately by gravity to its lowest point without being dissipated slowly by the usual ground water run-offs into the grass and earth of the golf course and surrounding verdant areas. The result will be increased heavy rainfall flooding.
- The plans state a 'climate change' +1% assumption in rainfall per year but this is likely to be significantly higher. Particularly, even +1% per annum will not come down evenly and will likely include two or three very large heavy rainfall periods each year causing extensive ground water flooding and River Arrow going over its banks, with significant risk to housing ingress.
- The plans do not include the effect on Hither Green Lane houses and the potential for increased flooding risks.
- The River Arrow is likely to flood the Golf Course more frequently than at present but there is no assessment of this risk nor any recognition of the extensive flooding, of which we have a lot of pictures over the years.

Arboriculture

- The plans will see the removal of 13 trees, 11 groups of trees (copses), 3 hedgerows, plus partial removal of another 11 groups of trees, 1 hedgerow and 1 woodland. This is because they will be within the development footprint or close to it. This is unnecessary and unacceptable.
- The removal of these trees is stated to be 'unlikely to have significant impact on the visual amenity value of the site'. These will include the a number of White Poplars; White Poplars are described as a 'Magical' tree according to the Woodlands Trust because, with a leaf green on one side and white on the other, it looks like snow in summer and autumn.
- Redditch has declared a Climate Change Emergency and needs to live up to it.

Biodiversity Net Gain

- The Environment Act 2021 requires all new developments to show a Biodiversity Net Gain of 10% over 30 years. Whilst not yet in force this development should be judged against these requirements.
- The papers show that Redditch Borough Council requires a 'Biodiversity Metric Assessment' of the proposals couple with 'a legal mechanism underpinning the delivery of such an agreement over a 30 year period'. It says that a 'Biodiversity Plan should be produced (para 6.2) with a long term strategy to measure the Biodiversity Gain over 30 years'. The omission of this required plan is alone a significant reason for its rejection. To achieve the requirements of the Environment Act needs detailed verifiable metrics along with legal enforcement. To date nothing has been produced.

Conclusion

NoRCA is very concerned that a significant proportion of the application's rationale continues to be based on out of date and simply inaccurate information. We cannot see anything in these latest documents that would negate the objections we have detailed in our previous submissions.

Having regard to the above it is clear that this application requires yet further checking and revision such that, in the interests of Natural Justice and Good Governance, NoRCA invite the Council to invite the applicants to withdraw the application so that a full, correct and proper resubmission can be made. In the absence of this it is requested that the Council should move to refuse the application.