

28<sup>th</sup> August 2024

Our Ref: 333101173/A3/KV

The Planning Inspectorate  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6PN

## **BY ELECTRONIC SUBMISSION**

Dear Sir / Madam

**[APPEAL APP/Q1825/W/24/3350905](#)**

**[LAND AT HITHER GREEN LANE, REDDITCH](#)  
**[REDDITCH BOROUGH COUNCIL](#)  
**[APPEAL AGAINST REFUSAL OF PLANNING PERMISSION](#)******

We write on behalf of our client, Barratt David Wilson Homes (Mercia) to submit an Appeal against the refusal of a planning application at the above Site (LPA Reference: 21/01830/FUL). The following documents have been submitted in support of this Appeal:

- Completed Appeal Form;
- Procedural Note (with regard to Annex K and the request for the appeal to be heard by way of a Public Inquiry)
- Statement of Case;
- Draft Statement of Common Ground; and
- Copy of the Planning Application and other relevant documents.

This Appeal submission follows pre-notification of the Appeal provided to the Planning Inspectorate and Council on the 2<sup>nd</sup> April 2024. The Appellant requests that the Appeal be dealt with by the way of Public Inquiry and that 8 days will be required. This appeal is against the refusal of the application by Redditch Borough Council

As per the Appeal Procedure Note appended to this letter, there is a need for formal cross examination and testing of evidence, particularly given that there is likely to be disagreement between the Appellant and the Council on several key matters; and that it involves the interpretation of complex multi part policies. It is therefore important that evidence is thoroughly tested and that the Appellant has the opportunity to call their own expert witnesses to present what they believe to be the correct and true position.

It is also anticipated that the housing land supply position (and the extent of the shortfall) will be a matter in dispute between the parties.

There is also very substantial local interest in the Appeal application with in excess of 350 objections and it is anticipated that a formal request could be received from residents to be a Rule 6 party.

At this stage, it is anticipated that the Appellant will need to call five or possibly six witnesses, as follows:

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- Planning / Open Space
- Specialist Golf
- Affordable Housing
- Housing Land Supply
- Design
- (Landscape)

The Appellant is seeking agreement to an 8 day Inquiry, to also allow for local residents to speak; a site visit; planning conditions and Section 106 Agreement discussions; and opening and closing submissions.

The Appeal will involve the presentation of evidence and cross examination of witnesses by Leading Counsel, with advice having already been sought in this regard by the Appellant in determining the number of witnesses.

We enclose a detailed Statement of Case and a draft Statement of Common Ground.

The reasons for refusal raise matters, especially in relation to design matters, which were not raised at all during the 2 year lifespan of the planning application. The Appellants have therefore provided the following additional documentation which seeks to respond to the reasons for the refusal and which we provide with the appeal to assist with the smooth running of the Inquiry as opposed to submitting with evidence:

- Site Plan – showing additional tree planting / changes to surface materials.
- Design and Access Statement (August 2024)
- Amended house type elevations (there are no changes to plots / numbers)

It is not considered that supplementary information gives rise to any procedural matter. Rather, this evidence has been produced in advance of the submission of evidence to respond to the reasons for refusal, which raised matters which were not previously put to the Appellants. The LPA will therefore have a fair opportunity to respond to this evidence in their evidence to the Inquiry.

Yours Sincerely,



**KATHRYN VENTHAM**  
Planning Director

**STANTEC UK LIMITED**

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