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Paul Lester  
Principal Planning Officer  
Bromsgrove District Council and Redditch Borough Council  
Parkside  
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Bromsgrove  
Worcestershire  
B61 8DA

**SUBMITTED VIA EMAIL**

26273/A3/HM/bc  
19<sup>th</sup> July 2022

Dear Mr Lester,

**RESPONSE TO CONSULTEE COMMENTS, LAND OFF HITHER GREEN LANE, REDDITCH**

**PLANNING APPLICATION REFERENCE: 21/01830/FUL**

We write on behalf of our Client, BDW Trading Ltd, to formally respond to the comments received in respect of Planning Application 21/01830/FUL, which relates to the development of Land off Hither Green Lane, Redditch ('the Site').

An amended site layout has been prepared (plan reference: ME-24-21U), which forms part of our response, and supersedes the corresponding previously submitted plan.

Each of the consultee comments are set out and responded to in turn below:

**Statutory Consultee Comments**

Worcestershire Wildlife Trust

Worcestershire Wildlife Trust responded to the application and requested that a biodiversity losses and gains analysis for the proposed development be provided.

In accordance with the comments, a Biodiversity Net Gain Concept Plan (Middlemarch Environmental Ltd, May 2022) has been prepared and submitted to the Council. The BNG Concept Plan within the report sets out an approach to enhancing the nature conservation status of Abbey Park Hotel Golf Course and indicates that the site provides suitable opportunities for biodiversity enhancements.

A Biodiversity Metric Assessment has been undertaken in parallel, which is shown at Appendix A of the report. This indicates that, if implemented, the measures detailed in the Concept Plan could provide up to 5.81 BU (Habitats) and 1.96 BU (Hedgerows).

It is therefore considered that the Abbey Park Hotel could offer sufficient biodiversity uplift opportunities to offset residual effects from the proposed development scheme at Hither Green Lane, in accordance with National Policy requirements.

#### Worcestershire County Council – Historic Environment Advisor

WCC Historic Environment Advisor responded to the application and recommended that a pre-determination archaeological investigation be undertaken to establish the potential for below ground remains and the impact of the proposed development on the Historic Environment.

Following receipt of the response, a Heritage Statement was prepared and submitted (Barton Willmore now Stantec, April 2022). The Statement concluded that:

- Built Heritage Considerations – the proposed development comprises a high-quality residential scheme, which has been influenced by the local vernacular. The land which comprises the site in its present condition does not contribute to the appreciation of the identified heritage assets. Therefore, taking into account the embedded design mitigation and the arrangement of the proposed built form away from the Scheduled Monument and the River Arrow, it is considered that the proposals will make a positive contribution to the local character of the wider area, and will result in a neutral impact to the appreciation of the identified designated heritage assets via a change in setting, resulting in no harm to their significance.
- Archaeological Considerations – the proposals are unlikely to impact on significant archaeological remains. Due to past ground disturbance and the likely lesser significance of any surviving remains, it is considered that pre-determination archaeological fieldwork is not necessary, and any archaeological fieldwork can be secured by a planning condition.

It is understood that dialogue between Barton Willmore now Stantec and the Historic Environment Advisor is ongoing, in order to resolve any concerns that remain outstanding. Notwithstanding this, it is considered that any archaeological considerations could capably be dealt with by way of a prior to commencement planning condition, and the proposed development is therefore acceptable in this regard.

#### Worcestershire County Council - Highways

Worcestershire County Council have responded to the application and have requested that further information is provided. The applicant and the appointed transport consultant are liaising with highways directly in this regard, and amendments are being made to the Transport Assessment and layout accordingly.

#### Worcestershire Regulatory Services – Air Quality

Worcestershire Regulatory Services (Air Quality) have advised that they have no adverse comments to make with respect to air quality and recommend several conditions in relation to: the provision of secure cycle parking, appropriate cabling and an outside electrical socket for each property, and Ultra-Low NOx boilers.

As such, with the conditions in place<sup>1</sup>, the proposed development is considered to be acceptable in relation to air quality.

<sup>1</sup> We would welcome detailed discussion in terms of condition wording in due course.

### Worcestershire Regulatory Services – Contamination

Worcestershire Regulatory Services (Contamination) responded to the application, and recommended a condition be included as part of any planning permission, relating to the provision of a tiered site investigation.

It is considered that, with the inclusion of the condition, the proposed development will comply with the National Planning Policy Framework (NPPF) by ensuring that the site is suitable for its proposed use, taking account of ground conditions, pollution arising from previous uses and any proposals for mitigation.

### Bromsgrove and Redditch Tree Team

Bromsgrove and Redditch Tree Team responded to the application and requested that consideration be given to amending the layout, in order to take account of a number of trees which they considered had the potential to conflict with the proposed development.

As part of the revised planning layout (included as part of this submission), the comments of the tree team have been considered as follows:

The Tree Officer raises concerns about T34, T35, T37, G12, G19, G22 and W1 in relation to the potential pressure for pruning arising to do the trees shading out adjacent plots. Trees T34, T35 and T37 are situated in open space so they cannot easily be pruned without consent. The trees within G12 also fall within open space and are situated to the front of all but one plot, which is situated side on so any shade from trees should not occur on primary living spaces to any significant degree and therefore there will be little pressure for pruning works. The trees within G19, G22 and W1 are also all in open space and are situated to the fronts of plots aside from a section of W1, however, this should not cast shade on any of the rear gardens.

Concerns were also raised about the potential impacts of the drainage scheme on several retained trees (T26, T27, T28, T29, T30, T39, T40 and T41). Given the location of the trees and the size of the site it is considered that the drainage can be designed so that it does not enter the RPAs of the trees.

The Tree Officer points out that due to their juvenile size and good form the trees G27 which are to be removed would make candidates for translocation. The feasibility of removing the trees from their current location within the site so that construction works can be undertaken and storing them during this long process before they can be permanently relocated is questionable. It should also be noted that the trees are Retention Category C due to their small size and immaturity and as such, have limited value for the site currently.

Finally, the Tree Officer expressed concerns about the construction of new hard surfacing for footpaths and roads in the RPAs of several trees. All new hard surfacing aside from the adopted roads will be constructed according to a no-dig methodology using a cellular confinement system and this will minimise the likelihood of the trees being significantly impacted by the works. The adopted road cannot be constructed using a no-dig methodology as it is understood that Highways will not adopt a road which utilises a cellular confinement system. However, the road occupies a comparatively small proportion of the RPAs which is situated at the peripheries and as such, it is expected that the trees will tolerate the works.

The proposed development will ensure the retention and incorporation of key trees across the site, alongside new tree planting as part of the wider landscape strategy. As such, the proposed development is considered to accord with policy 16 of the Local Plan and section 15 of the NPPF.

## Worcestershire County Council - Landscape

WCC landscape team responded to the application, and commented that an adequate quantity of tree planting has been indicated on the plans, and that the proposed scheme appears to be of a similar density to that of the existing settlement to the south east.

Comments are also provided in relation to the longer-term impact of the proposed development to the retained trees as a result of the proximity of some of the dwellings. As set out above, the proposed layout has considered the trees on the site, which have been retained where feasible. Notwithstanding the above, the landscape officer has advised that this matter could be dealt with by way of a Landscape and Ecological Mitigation Plan (LEMP), secured as a pre-commencement condition. Subject to the inclusion of the condition, the landscape officer has no objection to the scheme on landscape grounds. It is therefore considered that with the condition in place, the proposed development is acceptable from a landscape perspective.

## Housing Strategy

Housing Strategy responded to the application and advised that they were happy with the peppercorn of affordable units on the site, and the percentage of affordable housing and shared ownership. Notwithstanding this, housing strategy stated that there was a requirement for the rented element to be social rent, not affordable rent. The applicant has confirmed that social rent will be provided as part of the development.

The comments stated that the housing need shows a requirement for larger accommodation including four-bedroom properties, and as such a preferred mix was set out for:

- 4 x 4 bed houses
- 36 x 3 bed houses
- 24 x 2 bed houses
- 1 x 1 bed houses

In this regard, an updated layout is provided, which includes an adjusted affordable mix to get as close to the HSO's comments as possible. As such, the following is now proposed:

- 4 x 4 bed houses
- 35 x 3 bed houses
- 24 x 2 bed houses
- 2 x 1 bed houses

The proposed development is therefore considered to provide a suitable / appropriate mixture of housing, in accordance with Local Policy requirements.

## Local Lead Flood Authority (LLFA)

The LLFA responded to the application, advising that they were broadly supportive of the principle of the development, however required the following further information / amendments:

- Preserve existing drainage features and incorporate them into the layout and site landscaping;
- Provide attenuation to separate sub catchments of the site rather than single large features;
- Provide source control measures for the site;
- Undertake a Simple Index Assessment for site runoff water quality.

The response from the LLFA was reviewed by the Applicants drainage consultant, and a revised Flood Risk Assessment, taking into account the comments raised, was submitted on the 20<sup>th</sup> of April 2022. Following this, further comments were provided directly to the applicant's drainage consultant by the LLFA, requesting additional amendments to the proposed drainage strategy. These are currently being addressed, and it is understood that a revised FRA will be forthcoming in due course.

## Conclusions

We trust the above adequately addresses all outstanding queries in respect of Planning Application 21/01830/FUL and demonstrates how the applicant has worked constructively in order to respond to the consultee comments that have been provided.

It is disappointing that it has now been over 3 months since we last heard from you (29<sup>th</sup> March), and on this basis, we would request that an update is provided on the application as soon as possible, and that an extension of time is provided in order to allow this.

We would also like to request a meeting with you, in order to discuss the progress of the application, and we would be grateful if you could provide your availability for this.

In the meantime, if you require any further information, or wish to discuss any aspect in greater detail, please do not hesitate to contact myself or Kathryn Ventham.

Yours sincerely,



**HOLLY MARTIN**  
Senior Planner