

Mr P Lester
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2nd February 2024

via e-mail : paul.lester@bromsgroveandredditch.gov.uk

Dear Mr Lester

Ref : 21/01893/FUL - Proposed development of land adjoining Hither Green Lane

The Planning Statement dated January 2024 (document reference 333135496/A5/P1/SL/KV/bc) posted onto the Public Access portal on behalf of the applicant is duly noted.

The NoRCA response to previous iterations and updates provided on behalf of the applicant, as set out in my letter to you dated 27th July 2023, remains entirely valid. The latest document, albeit presented in the style of highly-remunerated consultants, cannot be considered to advance the applicants claims and completely fails in its attempts to justify the application. The large number of inaccuracies evident in the extensive portfolio of supporting documents and statements have not been addressed. I assume you and your colleagues will have validated these and challenged them as necessary. However, I appreciate there are many contending demands on your department's time and the resource constraints you face. Dealing with a complex application such as this and the need for forensic analysis of the copious amount of data that has been provided to support the application is a self-evident challenge.

NoRCA does not have the capacity to rigorously examine every jot and tittle of the material posted onto the public access portal. Our concern is that the sheer weight of material can easily be used to obfuscate the real nub of the issue – and indeed mask basic errors and mistakes.

A simple example of this can be seen on page 3 of the latest Statement where it is stated that bus stops exist on Dagnell End Road and buses operate to a variety of nearby towns (*ref.* 2.3.2). This is utterly untrue. As has been pointed out in previous NoRCA responses there are no bus stops serving the proposed site and the bus services referred to have not operated for many years.

I also note the comment that local residents were consulted prior to the application being submitted (*ref.* 3.1.1). This is simply disingenuous. Yes, a pamphlet was pushed through the door with scant detail and a a web-site address; I did provide my basic comments, as did others, but I did not receive any acknowledgement. The website was decommissioned shortly thereafter once the application appeared on the Council public access portal.

These are unlikely to be isolated examples of mistakes, falsehoods, or inaccuracies. I can only suspect that other examples exist within the hundreds of pages of supporting material that has been presented. I'm not that concerned about simple errors; the issue is statements or claims that are incorrect and which relate to aspects of the application that could have a material bearing on the decision-making process. Certainly, elements of the material I have viewed can best be categorised as good examples of Panglossian rhetoric.

Reference is made to '*a review of the planning portal has been undertaken*' (ref 2.4.1). Interestingly, there is no recognition of the 343 objections to the application (we believe this number to be understated as previously advised). At this time, there are no comments in support of the application. It is a concern that no attempt whatsoever has been made by the applicant to address any of these extensive objections.

To reiterate, NoRCA's main objections are summarised as follows :

The application does not conform with key aspects of the current local plan BORLP4. Redditch does not need these houses; it has overachieved in its delivery against Government targets.

It is contrary to the latest National Planning Policy Framework. This places more emphasis upon design and build form. It also allows authorities to allocate less land to future development if local officials can argue that more development would damage the character of an area. The clear guidance within the Framework underlines that the appropriate vehicle to consider this application and other unallocated sites has to be the next iteration of the Local Plan where the merits or otherwise of any new site can be considered against all other sites and the appropriate level of housing requirement.

The suggested development will prove highly detrimental to the environment and biodiversity. The presented data claiming otherwise cannot be corroborated and is highly unrealistic. Building on this extent of designated green open space and the attendant destruction of trees and hedgerows is counter-intuitive to an increase in biodiversity and is detrimental to wildlife.

Environmental pollution, such as noise, waste and litter, will be dramatically increased; this will have a lasting detrimental impact on local residents.

The style, design and layout of the dwellings are greatly at variance with the adjacent Hither Green Lane properties. The proposed number of properties is more than double those on Hither Green Lane; the density is at least three times greater.

The extent of the development will further add to existing traffic congestion problems and impact road safety in the area. NoRCA has previously highlighted several technical and factual deficiencies in the latest Traffic Assessment document; these have yet to be addressed, hampering our ability to properly evaluate the data.

It will create further demand on already greatly over-stretched social infrastructure and amenities such as primary health care services, schools etc. Simply providing a list of schools and services in the area does not equate with being able to provide the additional capacity the development will require.

The quality of life currently enjoyed by local residents will be significantly reduced; this is completely at variance with what is being claimed.

The proposed development degrades the only Championship standard 18-hole 'pay and play' golf course in the Borough. The course and hotel complex, currently a real asset to the town, will no longer be one of Redditch's precious leisure resources and attractions. 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 could threaten its future viability and sustainability.

The land is subject to a covenant restricting its use to leisure purposes. Whilst it is recognised this is a legal matter for the applicant to deal with, planning consent should not be granted if there is a realistic prospect of the development not being able to progress due to legal issues.

The latest iteration of the Statement also contains a full copy of an Appeal Decision (*Appeal Ref: APP/B2002/W/22/3311282*) which would appear to be an indication as to the action the applicant may take should the application be rejected. However, the case in no way can be equated with the application you are considering. The Torbay Drive application is a totally different site and context. There are clear biodiversity benefits to be achieved – unlike the Hither Green Lane case. There is no impact on local leisure and economic facilities – unlike Hither Green Lane. Fundamentally, the 13.1 years' housing land supply figure quoted (ref 6.2.3) is an arithmetic calculation based upon a nominal reassessment of housing needs; prior to this the Council had a 4.2 years' supply and a known history of under-delivery. As a proud resident of Redditch, it is pleasing to know that my local authority is the opposite. Citing this example of an Appeal is akin to comparing pears with parsnips.

More pertinent and relevant to the application from an Appeal process perspective is the Widnes Golf Course case (*Appeal Ref: APP/D0650/W/21/3285817*) where the decision by the Planning Authority to reject the development application to build on golf course land was upheld on appeal. There is great similarity between this and the Hither Green Lane application.

The proposed development is not needed by Redditch Borough Council for it to achieve its housing targets. Even if additional new builds were needed within the coming years, there is absolutely no necessity to build on green open space in the Borough. Should this land come to be considered for development in the longer term, it should be subject to the detailed assessment and review within the Local Plan Review process. This is the right and proper forum to consider any sites to meet future housing needs - where any impacts can be properly assessed against other possible sites being considered to meet longer term needs across Redditch. To bring this site forward now, where there is an abundance of housing sites to meet current Development Plan requirements, remains totally unnecessary and would be utterly perverse.

NoRCA remains committed to opposing the proposed development. We have the collective communal will and the means to do so. We take heart from the success last year of a similar group in Shropshire, Greenfields Community Group, who took their objections to planning approval being granted by Shrewsbury Town Council through the legal process eventually up to the Supreme Court where the Council decision was overturned. (Reference : <https://www.supremecourt.uk/cases/uksc-2021-0031.html>).

Yours sincerely



Mark Jacobs
Chair (NoRCA)



cc: Cllr. M Dormer (Leader of the Council)
Ms R Bamford (Head of Planning)

