



6 Stafford Place SHIFNAL Shropshire TF11 9BH

Tel: 07976 080813

Email: andy@advance-planning.co.uk

VAT Registration No. 142677502

Ruth Bamford - Head of Planning and Regeneration
Bromsgrove District Council
The Council House, Burcot Lane
Bromsgrove
B60 1AA

Our Ref: ALP/HD/Web/GO/PS2

15 May 2013

Dear Madam,

REDDITCH HOUSING GROWTH OPTIONS: HEYFORD DEVELOPMENTS LIMITED
LAND WEST OF THE BROMSGROVE HIGHWAY, WEBHEATH, REDDITCH.

1.0 Introduction

1.1 Redditch Borough Council is committed to preparing its Local Plan No.4 and Bromsgrove District Council is in the process of preparing a new Local Plan: both Local Plans have now been aligned so as to extend to 2030.

1.2 Furthermore, in the light of the explicit 'Duty to Cooperate' that is now enshrined in the Localism Act 2011 and reaffirmed in the National Planning Policy Framework (NPPF), both Councils have acknowledged that Redditch Borough Council will not be able to meet its long-term development needs sustainably on land within its administrative boundary and so Bromsgrove District Council officers have been instructed to work with Redditch Borough Council officers, in an attempt to find a mutually acceptable solution of accommodating the element of Redditch's growth needs which cannot be met within the Borough's boundaries.

- 1.3 As part of this process, a joint, cross-boundary Housing Growth Consultation Development Study (HGDS) has been prepared, backed up by an extensive and continually evolving evidence base, to consider the options for creating sustainable urban extension(s) to accommodate in the region of 3400 dwellings within Bromsgrove District, immediately adjacent to the north/north-west edge of Redditch.
- 1.4 The HGDS has concluded that Area 4 at Foxlydiate, Webheath (Site 1) and Area 6 at Brockhill East (Site 2) as an extension to the allocation of land within Redditch Borough, are on balance, considered to be the most suitable locations for growth.
- 1.5 Heyford Developments Limited (HDL) has a controlling interest in the majority of the land identified as Option 1 at Foxlydiate and remains keen to promote it as a sustainable urban extension to the north-west of Redditch. Two major house-builders also have a legal interest in part of the land south of Cur Lane, Webheath and they have indicated their intention to work closely with HDL to secure the delivery of the site for housing.
- 1.6 Representations have previously been submitted to both Local Planning Authorities in relation to their respective emerging Core Strategies and Heyford Developments has long held the view that cross boundary cooperation is the only way to provide for the future development needs of Redditch in a sustainable manner. We are therefore pleased to note that the two Councils' are now fully cooperating in terms of Development Plan preparation, in accordance with the requirement of the Localism Act and the National Planning Policy Framework
- 1.7 The purpose of this representation is to express HDL's **FULL SUPPORT** for the findings of the HGDS and its associated Sustainability Appraisal in identifying Area 4 (Site 1) at Foxlydiate as the most suitable location to accommodate around 2800 dwellings in the period up to 2030.

- 1.8 Furthermore, HDL wishes to express its ongoing commitment to work closely with the two Local Planning Authorities and other key Stakeholders, to deliver a sustainable extension to the existing urban area at Webheath
- 1.9 To assist the Councils in their joint deliberations, HDL has assembled a team of core consultants to prepare the appropriate surveys, studies, appraisals and design work to substantiate the proposal contained in the HGDS. A considerable amount of initial work has already been undertaken, but it is acknowledged that more detailed information will have to be provided in due course as the Plans are progressed. With this in mind, HDL looks forward to working closely with the two Councils and other key Stakeholders to demonstrate that the proposal at Webheath is suitable and achievable and ultimately to deliver development in a timely manner.
- 1.10 At this stage in the process, HDL is able to provide the following as part of this representation in support of the Councils' proposal at Area 4 (Site 1) Foxlydiate, Webheath:
- **Reports of the Availability of Services and Technical Site Constraints** (Discovery May 2013)
 - **Location and Phasing Plan** (Neil Boddison Associates – Architects)
 - **Indicative Concept Block Plans** (Neil Boddison Associates – Architects)
 - **Constraints Plans** (Neil Boddison Associates – Architects)
 - **Traffic and Highway Report.** (Dermot McCaffery- Highways and Transportation Consultant (May 2013)
 - **Landscape and Visual Impact Appraisals** (Aspect Landscape Planning November 2012 and May 2013)
 - **Ecology Appraisals Constraints and Opportunities** (Aspect Ecology October 2012 and April 2013)
 - **Preliminary Flood Risk Assessment** (Weetwood May 2013)

- 1.11 HDL acknowledges that further and more detailed information will subsequently be required to support any proposals for an urban extension, but it is suggested that the initial work that has been undertaken, together with the extensive evidence base that has already been collated by the Councils, is sufficient at this stage to demonstrate that the Growth Option 1 is a suitable location to accommodate development and that this can be delivered within the Plan period.

2.0 Growth Option Area 1

- 2.1 Growth Option Area 1 is located on the north-west fringe of Redditch, immediately adjoining the northern edge of Webheath. It abuts a junction of the Bromsgrove Highway (A448) which provides excellent access to Redditch in the south-east, and Bromsgrove to the north-west as well as the wider road network.
- 2.2 Webheath offers a range of services and facilities including a post office; two primary schools, village hall, sports centre and public house. The nearest doctor's surgery is Millstream Surgery, which is approximately 2.5 kilometres away. There are also good vehicular and pedestrian linkages to the Redditch town centre and its wide range of facilities including employment opportunities. The bus service through Webheath has suffered through the cut-backs, but there is scope for its re-introduction and enhancement in association with new development.
- 2.3 Webheath, therefore, represents a sustainable community within Redditch, however, there is considerable scope for the enhancement of local services and facilities, which the development could deliver to the betterment of future residents and the existing community.
- 2.4 As acknowledged in the HGDS, the Growth Option Site 1 is defined by strong, readily recognisable and defensible boundaries formed by the Bromsgrove Highway to the north-east; Foxlydiate Lane to the south-east; Pumphouse Lane to the south;

strong natural features such as mature hedgerows and a stream to the west; and Cur Lane and Gypsy Lane to the west and north-west.

- 2.5 HDL is of the opinion that the potential urban extension can be considered as three adjoining areas or ‘compartments’ of land, which are capable of being developed comprehensively on a phased basis over the Plan period. For the purposes of this Statement, these areas can be referred to as:

1. **Area 1 (rear of the Foxlydiate Arms);**
2. **Area 2 (south of Cur Lane); and**
3. **Area 3 (north of Area 1 and north-east of Cur Lane and Gypsy Lane).**

It is suggested that Area 1 can reasonably be considered as a first phase, with Area 2 as a sensible second phase and Area 3 as a potential third phase.

- 2.6 A detailed description and assessment of the overall site is contained in the HGDS and is also provided in the Landscape and Visual Assessments that have been prepared by Aspect, for HDL.

- 2.7 Area 1 measures approximately 42 hectares (104 acres) and forms a roughly square shaped area that extends from the junction of Birchfield Road with the Bromsgrove Highway in the north, to Cur Lane in the south-west; and from Foxlydiate Lane in the East to bridleway/public footpath and hedge in the west. The land abuts the north-west edge of Webheath and to the north, there is also built development in the form of the Foxlydiate Arms, the Redditch Premier inn, a garage and residential development.

- 2.8 Area 2 measures just over 42 hectares (105 acres) and comprises an elongated area of mainly pasture land that extends south from Cur Lane to Pumphouse Lane. Built development at Webheath adjoins the eastern boundary and the south-eastern boundary adjoins the Webheath ADR housing site.

- 2.9 Area 3 measures approximately 57 hectares (around 140 acres)* and also forms a roughly square shaped area that extends north from the boundary with Area 1 to Cur Lane and Gypsy Lane west and the Bromsgrove Highway to the north-east.

*It should be noted that for the purposes of this representation, HDL has focussed its consideration on a reduced development area which does not extend as far north as the Growth Option 1 site indicated in the HGDS. This is because HDL considers that it should be possible to accommodate the requirement of around 2800 dwellings at a reasonable density within Areas 1, 2 and the southern part of Area 3.

- 2.10 In combination, these three areas measure almost 140 hectares (around 346 acres) on the edge of Webheath and with the potential for excellent access to the Bromsgrove Highway (A448).

3.0 The Technical Services and Constraints

- 3.1 Discovery, has undertaken a preliminary investigation into the general availability of services and also the presence of any on-site physical constraints caused by existing services. Its findings are provided in brief reports for each of the three areas/phases. Site Constraint Plans have also been prepared to indicate the presence of existing constraints, all of which can either be accommodated in-situ, or realigned within any future development scheme(s).

- 3.2 In summary:

- **Electricity Services** are not an impediment to the development of the site(s). Where necessary, the 66kv and 11kv cables can be diverted into an underground route through the development. There may be a need for future reinforcement works to the Redditch primary substation, but Western Power Distribution does not consider that this would be an impediment to development.

- **Water Services:** water abstraction boreholes are situated either side of Cur Lane, but these do not represent a significant constraint to development. There are a number of water mains that cross the site and these will have to be accommodated in-situ within any development layout. It may be necessary to reinforce the local water supply network, but this is perfectly feasible and viable.
- **Gas Services:** a high pressure gas main crosses Area 3 and will have to be accommodated within any layout. It is assumed that reinforcement of the local gas network will be needed, but this is achievable.
- **Communications:** A fibre-optic cable follows the line of the gas main Area 3 but as with the gas main, this could be accommodated within a central area of open space.
- An **Oil Pipeline** crosses the north-western part of Area 3 and will have to be accommodated with any layout.
- **Foul Water Drainage:** the site is clear of any existing adopted or private sewers. Subject to the phasing of development and following improvement works, adequate capacity can be made available at either Redditch Priest Bridge and/or Redditch Sprenal sewage treatment works. There may be a need for improvements to the sewerage infrastructure system which the water authorities will have a statutory duty to resolve. The contours of the site suggest that foul water will be discharged via on-site gravity sewers to new pumping stations and pumping mains to a suitable outfall sewer.
- **Foul Drainage and Water Supply** Severn Trent Water has welcomed early discussions regarding foul drainage and potable water supply. Further modelling will be undertaken in order to determine current capacity within the existing networks and the timescales for implementing upgrades required in order to accommodate the full extent of the proposed development.
- **Surface Water Disposal:** A preliminary Flood Risk Assessment has been prepared as a basis for discussion with the Environment Agency. It should be noted that the site is not within a flood plain and is classified as Flood Zone 1 and therefore satisfies the requirements of the Sequential Test. The risk of

groundwater flooding is low across most of the site, although there may be some localised susceptibility in the central and north-west areas, but this can be managed and is not considered to be a significant impediment to development. The propensity for surface water flooding is considered to be low. Following development, the overall impermeable areas at the site are expected to increase, but there is no reason to suggest that a scheme for the provision and implementation of a surface water regulation (attenuation) system cannot be agreed with the relevant Authorities.

- 3.3 In conclusion, whilst the site is crossed by a number of underground and above ground services, it would be perfectly feasible to either accommodate or where appropriate, realign these within any development layout for the site(s). Furthermore, early indications are that all principle services and drainage provisions can be made available to serve any new development and that there are no overriding technical constraints.

4.0 Transportation

- 4.1 HDL has commissioned Dermot McCaffery (Highways and Transportation Consultant) to prepare a full Transportation Assessment for the housing-led mixed use development of the overall site, on a phased basis. This work is being undertaken in liaison with the Highway Authority and is ongoing.
- 4.2 A Transport and Highway report has been prepared to accompany this representation. It is intended to provide an initial overview of the constraints and opportunities that exist in relation to transportation matters.
- 4.3 The submitted Report confirms that discussions are continuing with the Local Authorities regarding the assessment of the strategic impact of the development of the area and the sustainable transport measures that should be included.

- 4.4 The report notes that modelling work undertaken to date indicates that development in this area is likely to exert the main pressure on the A448 (Bromsgrove Highway), the Slideslow roundabout and the A38 running northwards to Junction 1 of the M42. These key locations will require further detailed study to assess the specific impact and mitigation required as a result, although it must be noted similar impacts are felt from other development scenarios. Therefore acknowledging that significant improvements will be required, this impact on highways infrastructure is not seen as a barrier to development.
- 4.5 Additional traffic modelling work will be commissioned from the Highway Authority's own consultants to enable the detailed assessment of the capacity of the Foxlydiate junction on the A448.
- 4.6 Development in this area will provide scope to provide a link road from the Foxlydiate junction on the A448, through Area 1 to connect with an improved junction with Church Road and also on into Area 2 to allow for the potential of a road link to the proposed new housing on the ADR site to the south-east. Such a link road would inevitably reduce the volume of traffic from the ADR site that will need to filter through the Webheath area to reach the wider highway network.
- 4.7 The development will deliver high quality and high frequency bus services with an ultimate target frequency of 10 minutes. These services will link to Redditch and Bromsgrove town centres and train stations. The routing of the services is a matter for detailed consideration at the appropriate time but it is likely that services will run through Webheath and will therefore benefit existing residents. The layout of each phase of the development will ensure that all dwellings are located within 250m of a bus stop.
- 4.8 The inclusion of a district centre and primary school within the first phase of any development (Area 1) will reduce the volume of traffic leaving the boundaries of

the development area. The district centre and school will be located towards the eastern part of the site and will therefore be within walking and cycling distance for Webheath residents.

- 4.9 The development will include improvements to the walking and cycling network and will respect the existing public rights of way that cross the site.
- 4.10 In overall terms, therefore, HDL is confident that with improvements, the development can be accommodated within the local and strategic highway network, and it is capable of delivering an accessible and sustainable urban extension that will not only provide for the Borough's housing need, but which will also improve local highway infrastructure along with the range of social and community services available in Webheath to the benefit of the local community.

5.0 Landscape and Visual Impact

- 5.1 Aspect Landscape has prepared two Landscape and Visual Appraisals (LVA's): one which covers Areas 1 and 3 to the north of Cur Lane and another to cover Area 2 to the south of Cur Lane. The reports also briefly consider other potential strategic growth locations to the north-east of the A448 and also west of the A441. The Appraisals consider opportunities and constraints that should be weighed in the balance with many other planning considerations to determine the suitability of strategic growth options.
- 5.2 The reports analyse the landscape character and visual environment of the local area; define the sensitivity of the receiving landscape and assess the ability of the growth options, especially the land at Webheath, to accommodate an urban extension to Redditch.
- 5.3 The LVA's include a Table that provides a useful summary of the Consultants' findings, which confirms that in terms of landscape character and the visual

environment, the land at Webheath (Areas 1 and 3) has the greatest capacity to accommodate development and Area 2 (south of Cur Lane) has similar capacity to the other potential growth options.

- 5.4 More particularly, the first report concludes that Area 1 lies in a localised valley which affords it a degree of containment and enclosure by roads and strong boundary vegetation, including a strong belt of trees along the existing urban edge of Webheath currently defined by Foxlydiate Lane.
- 5.5 It confirms that the land has limited visual receptors which add to the moderate level of sensitivity, in contrast to other Growth Option areas to the north-east of the Bromsgrove Highway and beyond.
- 5.6 In summary, the Report finds that from a landscape perspective, when compared with other potential areas around the northern edge of Redditch, Growth Option Site 1 (Areas 1, 2 and 3) offers the strongest potential to accommodate development that is carefully designed to respect the setting of the existing urban area, and the sensitivity of the adjacent landscape.

6.0 Ecology

- 6.1 Aspect Ecology has prepared two separate reports to identify any potential ecological constraints in relation to Growth Option 1. The first considers the land to the north of Cur Lane (Areas 1 and 3) and the second considers the land to the south of Cur Lane (Area 2).
- 6.2 The reports provide a summary of the key ecological issues identified, with recommendations for any further ecological work required in due course. As with the LVA's, the Ecology Appraisals also briefly consider other potential strategic growth locations to the north-east of the A448 and also west of the A441.

6.3 In summary, based upon current information, an initial comparative analysis indicates that the proposed Growth Option 1 (Areas 1, 2 and 3) has overall, the fewest potential ecological constraints to development, whilst areas to the north-east of the A448 and west of the A441, potentially have the most.

6.4 Both reports conclude that in respect of the area defined by Growth Option 1 (Areas 1, 2 and 3), no over-riding ecological constraints have been identified from the initial survey work and evidence reviewed to date. On the contrary, development of this area affords significant opportunities for improving biodiversity, both through change of land use and the incorporation of ecological enhancements, which will accord with national and local planning objectives and the aims of the UK and Worcestershire BAPs.

7.0 The Concept Plans

7.1 As stated above, HDL considers that the proposed Growth Option Area 1 can be considered as three adjoining areas or 'compartments' of land, which are capable of being developed on a phased basis over the Plan period. It is suggested that Area 1 can reasonably be considered as a first phase, with Area 2 as a sensible second phase and Area 3 as a potential third phase.

7.2 Neil Boddison Associates (NBA) have taken account of the site characteristics, constraints and opportunities highlighted in the various reports and appraisals that have been undertaken, in order to prepare three preliminary Concept Plans that indicate how the three potential areas might be developed to a future overall Master Plan.

7.3 The basic concept would be to provide development at a medium density, which might be reduced towards the fringes of the various areas, where sensitive landscape or other environmental or technical issues suggest that a lower density might be more appropriate.

- 7.4 HDL considers that development across the whole Growth Option 1 area could average out at around 35-40 dwellings per hectare (DPH), which when applied to a notional net coverage of around 67% of the gross development areas, equates to some 75-80 hectares capable of accommodating around 2800 dwellings, plus extensive areas of public open space as broadly indicated on the concept plans. It is anticipated that Areas 1 and 2 might each accommodate in the region of 1000 dwellings, whereas the reduced Area 3 could accommodate around 800 dwellings, with the remainder to the north, retained as open land or woodland.
- 7.5 It is anticipated that Area 1 would accommodate a Local Centre comprising a Primary School (which would be capable of being enlarged); plus a small group of shops and possibly a health centre (doctors and dental surgeries and possibly a chemist). The school could be located towards the eastern edge of the site, so as to be well positioned in a very accessible location with good vehicular and pedestrian linkages and as close as possible to the existing urban area of Webheath, which it could also serve.
- 7.6 A Distributor Road would extend through the spine of the site to connect to Church Road and also extend on into Area 2, both via roundabout junctions. The road could also be extended northwards to link into Area 3. It is anticipated that the main Distributor Roads would also service a new bus route to be diverted through the site.
- 7.7 The Concept Plans also retain and links existing pedestrian routes and shows the potential connectivity & movement within the sites. The Plans also maintain and enhance green links/corridors and allow for planting buffers around sensitive boundaries.

7.8 The Distributor Road could extend right through Area 2 to potentially link with the proposed new housing development on the ADR site to the south-east. There should be scope to retain important existing hedgerows within the area and to strengthen boundary treatments around the peripheries.

7.9 The Concept Plan indicates that development within Area 3 could potentially be confined to the land south-east of the stream, with woodland planting to the north, thus allowing the land adjacent to Cur Lane and Gypsy Lane to remain open and undeveloped.

8.0 Conclusion

8.1 In summary:

- HDL strongly supports Growth Option 1, which is capable of delivering a sustainable urban extension to the Webheath area of Redditch.
- The land comprises unremarkable countryside that has no special landscape or ecological value and it is of no known special historical or archaeological value.
- The land is generally flat and is regular in shape with strong, well-defined and recognisable boundaries formed by roads and mature vegetation.
- A new urban extension can be served off an improved Foxlydiate junction of the Bromsgrove Highway to provide excellent and convenient access to Redditch town centre and employment areas; Bromsgrove; and wider areas, beyond.
- The urban extension is capable of being developed in three distinct phases to a comprehensive Master Plan to deliver a mixed use scheme of around 2800 dwellings; a Local Centre to provide for a Primary School that is capable of future expansion, a small group of shops and possibly a health centre to include a doctors' surgery, a dental surgery and a chemist; together with extensive areas of open space and pedestrian linkages.

- The development would therefore deliver a balanced and mixed community that would integrate well with the existing settlement and provide for enhanced facilities and communication links for existing residents in Webheath.
- The Concept Plans demonstrate one potential means of accommodating natural, physical and technical constraints to provide for a coherent urban extension. These plans are not, however, meant to be definitive at this stage in the planning process and are subject to change.
- The land is suitable, it is readily available, with no overriding land ownership; physical; technical; or environmental constraints and it can therefore be delivered without undue delay through a number of competing major house-builders.

8.2 In the circumstances, HDL looks forward to a continuing working relationship with the two Local Planning Authorities, to progress this exciting and sustainable development opportunity.

Yours sincerely

Andy Williams

A J Williams Dip TP, MRTPI

Director