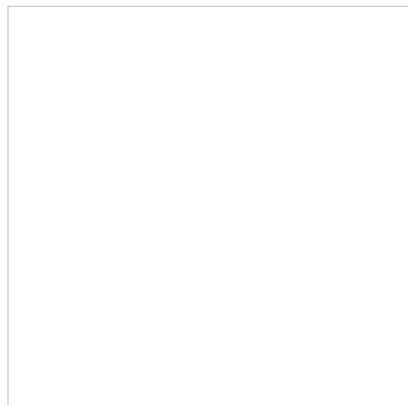
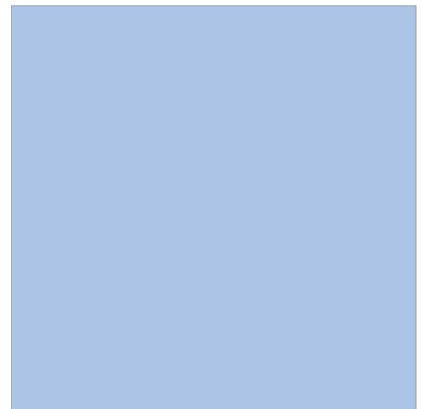
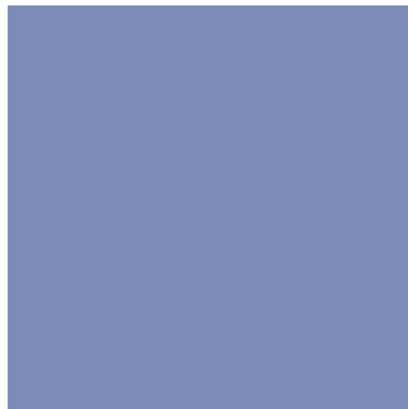
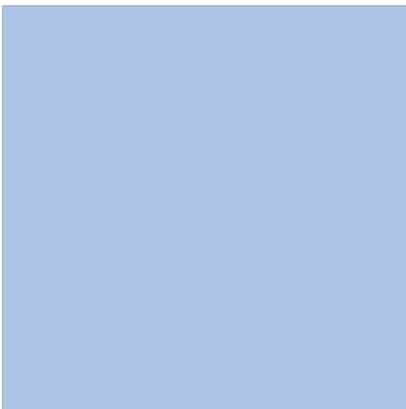


REDDITCH GROWTH CONSULTATION  
REPRESENTATIONS ON BEHALF OF  
PERSIMMON HOMES SOUTH MIDLANDS  
IN RESPECT OF  
LAND AT BROCKHILL NORTH AND EAST  
MARCH 2010



**REDDITCH GROWTH CONSULTATION**

**REPRESENTATIONS ON BEHALF OF**

**PERSIMMON HOMES SOUTH MIDLANDS**

**IN RESPECT OF**

**LAND AT BROCKHILL NORTH AND EAST**

**MARCH 2010**

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## 1. INTRODUCTION

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- 1.1 RPS Planning and Development has been retained by Persimmon Homes South Midlands (Persimmon) to prepare a response to the Redditch Growth Consultation in respect of land at Brockhill North and East, which lies to the north of Redditch to the west of the railway line leading to Birmingham. This land includes the larger western part of the Brockhill ADR and Brockhill Green Belt land, both of which have been identified in the Redditch Growth Consultation Booklet as being suitable to assist in accommodating the 4,000 new homes required by the emerging West Midlands Regional Spatial Strategy (WMRSS) for Redditch Borough.
- 1.2 The majority of the land is owned or controlled by Persimmon. Part of the land in the Green Belt is jointly controlled through a joint 'option agreement' with Gallagher Estates. Attached Plan RPS1 provides land control information in this area. Land in the Brockhill ADR to the east of the railway line is understood to be controlled by Gallagher Estates.

### **Background to the Area**

- 1.3 RPS (and formerly Mason Richards Planning (MRP)) has been engaged in the promotion of the land for Persimmon, following the adoption of the Borough of Redditch Local Plan No.2 in 1996, to meet housing requirements beyond 2001. Local Plan No.2 reviewed the Green Belt boundary in the North West Area and allocated the Brockhill development for 1,300 dwellings and safeguarded the Brockhill ADR land for potential development needs beyond 2001.
- 1.4 Between 2001 and 2003, MRP engaged closely with the Borough Council in the North West Redditch Masterplan process which was a study of the Brockhill ADR land and land at the Abbey Stadium site. The Council's intention was to prepare a masterplan for the comprehensive development of the area anticipating mixed use development on the ADR land including residential and employment uses. Persimmon proposed a scheme of some 450 dwellings on the northern part of the site and some 6ha of employment land in the south adjacent to the existing employment land on Windsor Road at Enfield.

- 1.5 Various masterplan versions were prepared by consultants retained by the Borough Council for the area reflecting these principles. Although the intended North West Redditch Masterplan Supplementary Planning Document was never adopted, the evidence base for it remains relevant and was refreshed as recently as 2006. This confirms the acceptability of development in the area from a landscape point of view, as concluded by Cooper Partnership who were retained by White Young Green the lead consultants for the project for the Borough Council.
- 1.6 It was, however, concluded in 2006 through Local Plan No.3, in the plan period only to 2011, that land was needed for employment use in the Brockhill East area and that there was no requirement to allocate additional housing land in the context of strategic policies under RPG11 Regional Planning Guidance for the West Midlands. Accordingly, the adopted Local Plan No.3 was adopted on the basis of an employment land allocation for 6.6ha in the southern part of the original Brockhill ADR land, with the balance of the area remaining as ADR land.
- 1.7 MRP had promoted the area comprehensively, recognising that the residential element should extend beyond 2011 yet still being required to ensure an identified supply for at least 10 years from adoption of the plan in accordance with ministerial clarification of PPG3 policy. It was argued that the employment land proposal was part of a comprehensive scheme where the costs of the infrastructure needed for the area would be paid for through the residential element. As a consequence, there have been delays in securing the delivery of the IN67 employment land proposal.
- 1.8 An application for retail and day nursery uses on land fronting Hewell Road in association with road access details into the ADR land and also including B1 Office buildings on a first phase of the IN67 site was pursued by Persimmon. This was refused and considered at appeal in 2006. The appeal was allowed but on a partial basis excluding the retail element. The exclusion of the land value derived from the retail element precluded the scheme proceeding viably and the IN67 land remains unserviced.
- 1.9 Persimmon is currently pursuing a residential scheme on the Hewell Road frontage land for 14 dwellings with an application due to be determined in March

2010. This will allow a first section of the access road towards the ADR and IN67 site to be implemented.

- 1.10 The access road has been designed to serve comprehensive development on the ADR land and on adjoining land in the Green Belt to the north.
- 1.11 RPS/MRP has engaged also at the regional and strategic planning levels of policy review in respect of discussions over growth of Redditch and the need for cross-boundary consideration given the sustainability advantages of locating growth in Bromsgrove District on the edge of the town. This has now been recognised in the WMRSS from Preferred Option stage when studies of the area were commissioned.
- 1.12 The WMRSS Submitted Preferred Option was published in December 2007 and proposed 3,300 dwellings in the Borough and 3,300 further dwellings in Bromsgrove and/or Stratford-on-Avon Districts on the edge of the town for the plan period between 2006 and 2026. A second stage study by White Young Green's Birmingham Office ['Future Growth Implications of Redditch'] (WYG2 report) for the local authorities concluded that housing should be distributed differently from the WMRSS Preferred Option, recommending a reduced level of approximately 2,400 new dwellings in Redditch Borough and the balance of the strategic requirement (at potentially an increased level following the RSS Examination) in Bromsgrove District east of A441, i.e. that at least 4,200 dwellings should be provided in Bromsgrove District on the edge of Redditch.
- 1.13 That study was published in October 2008 and formed the basis of the Redditch Preferred Draft Core Strategy which underwent consultation between October 2008 and May 2009. The reduced Borough capacity was based on a recommendation that the Redditch ADRs, including the Brockhill ADR should be added to the Green Belt. This was recommended by White Young Green without any Green Belt Review considering whether and to what degree land around Redditch fulfilled Green Belt purposes.
- 1.14 The WMRSS underwent its Examination between April and June 2009. RPS adduced evidence at the Examination refuting the conclusions of the WYG2 report. The Panel's Report did not agree with the WYG2 conclusions and recommended that the Redditch Borough requirement should be increased to

4,000 dwellings to make use both of the ADRs and also areas of Green Belt within the Borough where development can logically be accommodated. They also recommended that the Bromsgrove District requirement for Redditch related housing needs should be 3,000 dwellings, accepting that no peripheral housing should be accommodated in Stratford-on-Avon District in the period to 2026.

- 1.15 There is also a requirement for cross-boundary employment land which will affect both Bromsgrove and Stratford-on-Avon Districts. The RSS Panel recommended at least 31 ha employment land within Redditch and up to 25 ha within Bromsgrove, with 12 ha in Stratford-on-Avon District.
- 1.16 RPS and Persimmon welcome the acceptance by Redditch Borough and Bromsgrove District Councils of the wisdom of the Panel's conclusions and recommendations both in respect of overall development requirements and their distribution between districts.
- 1.17 To ensure delivery of the 4,000 dwellings required within Redditch Borough, it is accepted that additional sites outside of the urban area are needed. The *Revised Development Strategy* consultation paper for the Core Strategy provides a breakdown of the allocation which justifies using both ADR and Green Belt land to deliver this housing in the Borough. As established through the RSS Examination process, a cross-boundary approach is required to provide the remaining 3,000 dwellings, which are to be located within Bromsgrove District at the edge of the Redditch urban area (as in recommended new Policy SS11).
- 1.18 RPS supports the Core Strategies intention to deliver the increased allocation of 7,000 new homes recommended by the RSS Examination Panel. RPS also supports strongly the identification of land on a cross-boundary basis to the north-west of Redditch as the most sustainable location for housing led urban extensions.
- 1.19 RPS concurs that the Brockhill ADR and two Green Belt areas should be allocated for housing led expansion of the town to contribute to the provision of these homes. The Green Belt areas at Foxlydiate (Brockhill West) and Brockhill North and East both form part of wider cross-boundary sites suitable for comprehensively planned urban extensions.

- 1.20 It is also considered likely that the Webheath ADR will be needed for residential development, subject to highway capacity constraints.
- 1.21 The Redditch Growth Consultation Booklet identifies three broad options to locate these dwellings, and the central part of the option 'West of the A441' (Brockhill North and East) is controlled by Persimmon Homes and is considered to be an appropriate and sustainable location in the plan period to 2026 as a key part of an overall cross-boundary proposal for some 1,850 dwellings and associated uses and facilities. The combined area would include adjoining land in Redditch Borough comprising the IN67 existing employment land allocation, the ADR west of the railway line and the intervening area of Green Belt in Redditch Borough. There is also potential for further employment land on the ADR area east of the railway on land controlled by Gallagher Estates and also within the Redditch Green Belt land south of the Weights Farm Business Park and west of the railway line on land controlled jointly by Persimmon and Gallagher Estates.
- 1.22 The Bromsgrove District element of the cross-boundary Brockhill North and East proposal is some 1,000 dwellings, with some 850 dwellings in Redditch Borough on the ADR land (450) and Green Belt area (400).
- 1.23 Significantly, however, RPS considers that the land east of the railway line in Bromsgrove District within this 'West of A441' Option area is particularly sensitive in respect of forming the open River Arrow valley where no built development should be considered north of Weights Lane (the current Green Belt boundary).
- 1.24 RPS also represents Persimmon's joint interests with Miller Strategic Land and Southern & Regional Developments at Brockhill West which has capacity for some 2,000 dwellings in Bromsgrove District in the northern part of the 'Foxlydiate/Webheath' Option area (ie north of A448). Brockhill North and East and Brockhill West can together fully meet the 3,000 dwellings required in Bromsgrove District between 2006 and 2026 in the emerging West Midlands RSS.
- 1.25 The 'West of A441' Option also contains land to the north of Brockhill Wood which may be suitable for longer term development beyond 2026 linking urban



extensions at Brockhill West and Brockhill North and East proposed for the current plan period. The combined capacity of all these areas, including the western part of the 'West of A441' Option area, is evidently greater than the 3,000 dwellings required in Bromsgrove District to 2026 to meet Redditch related needs. The whole area is concluded to be suitable for development including into the longer term. Accordingly, RPS contends that the Green Belt boundary should be altered under PPG2 advice to exclude the wider area and the Bromsgrove Core Strategy should provide for a new ADR for potential longer term development in the western part of the 'West of A441' Option area.

- 1.26 A logical approach to phasing development is to extend the existing residential and urban area first at Brockhill North and East and Brockhill West which are closer to facilities and can most readily be integrated with the town. The intervening area would be a logical later longer term phase.
- 1.27 Plan RPS 2 identifies the long term Green Belt boundary for the north of Redditch resulting from the Green Belt Review RPS and FPCR has undertaken of the area.
- 1.28 Under separate cover, RPS has also submitted representations on behalf of Miller Homes, Southern & Regional Developments and Persimmon in relation to the Brockhill West area, north of the A448 which is the northern part of the 'Foxlydiate/Webheath' Option identified in the consultation paper. As identified above, this is also considered appropriate to accommodate a significant contribution of the 3,000 new homes required in cross-boundary locations.
- 1.29 RPS considers there is considerable merit in focusing the full requirement on the north-west edge of Redditch, integrating with the existing Brockhill area.

## 2. REDDITCH

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- 2.1 As there is the need for cross-boundary development between Redditch and Bromsgrove to meet the RSS targets of 7,000 new homes and some 56 ha of employment land in accordance with the RSS Examination Panel's recommendations (Policy SS11 and supporting text refers), it is essential that Redditch Borough and Bromsgrove District Councils work together in producing their Core Strategies on a fully aligned basis so as to locate future development in the most appropriate and sustainable locations.
- 2.2 RPS concurs fully that ensuring sustainable development in cross-boundary locations can only be achieved through appropriate joint working between the local authorities and in this case, without a Joint Core Strategy, it is essential that the Core Strategies are fully aligned and undergo examination in parallel. It currently appears that the Redditch Core Strategy is more advanced than that for Bromsgrove and this could cause difficulties in the process if the Bromsgrove aspects of Redditch related growth are not addressed in the same way as in Redditch Borough.
- 2.3 Persimmon's interests at Brockhill North and East straddle the boundary between the authorities with the great majority of the development area which is deliverable in the period to 2026 within Redditch Borough, taking access off Brockhill Drive in the south west and Weights Lane in the north east.
- 2.4 In Redditch, the *Revised Development Strategy for the Emerging Core Strategy Consultation Paper* justifies the release of ADR and Green Belt land in the Borough due to the Panel's recommended RSS housing requirement for Redditch (this is an increase of 700 dwellings above the RSS Preferred Option level for the Borough, but a more significant increase above the previous Preferred Option Core Strategy which did not conform with the RSS proposals).
- 2.5 The document states that some 1,940 dwellings can be accommodated in the urban area, but to meet the 4,000 new homes and minimum of 31 ha of employment land required for Redditch Borough further site allocations will be needed. Therefore, the Borough Council has concluded that it is necessary for ADR land and two Green Belt areas to be released to provide the remainder of this allocation.

- 2.6 The consultation booklet indicates that approximately 1,250 dwellings and 37 ha of employment land can be accommodated on Brownfield and Greenfield sites in Redditch, Astwood Bank and Feckenham. The document also indicates that approximately 1,350 dwellings and 7 ha employment land could be accommodated on the A435, Brockhill and Webheath ADR's, and a further 500 dwellings on the Brockhill and Foxlydiate Green Belt sites.
- 2.7 Of these areas, it is the 'Brockhill Green Belt' land west of the railway line which falls within the Brockhill North and East comprehensive development proposal advanced through this representation. The area in question has been identified in detail through a landowner questionnaire response to the Borough Council in the context of the Strategic Housing Land Availability Assessment update (SHLAA), confirming that Persimmon's interests are in land to the north west of the ADR and Persimmon have joint interests with Gallagher Estates in land to the north east of the ADR (see Plan RPS1).
- 2.8 The land should form part of a mixed use urban extension for which the detailed disposition of land uses remains to be determined. If the land were to be developed for residential use, RPS has estimated its capacity as some 400 dwellings having regard to the landscape constraints and opportunities for a mixed use approach. RPS considers that the Council's assessment of 300 dwellings is an underestimate of the area's capacity.
- 2.9 RPS concurs with Redditch Borough Council's conclusions that this area of Green Belt is appropriate to contribute to the housing and or employment land needs of Redditch Borough in the context of the cross-boundary growth strategy for the town established in the Regional Spatial Strategy, including references to Green Belt purposes, natural extension of existing development at Brockhill and Brockhill ADR, availability of some key infrastructure, its beneficial relationship with existing highway infrastructure and public transport (which can be extended to serve the development) and its close proximity to the town centre.
- 2.10 In Green Belt terms, RPS and FPCR considered this area as part of a comprehensive review of the Green Belt around the northern side of Redditch, reporting in December 2009. The report concluded that development would not have a significant impact on the Green Belt land at Brockhill given the containment of the area and in recognition that comprehensive development in

the location would include the Brockhill ADR land which had already been excluded from the Green Belt. Encroachment into the Green Belt would therefore be less than a development solely in the Green Belt. Development would not constitute unrestricted urban sprawl or lead to coalescence risk.

- 2.11 The identified constraining issues, apart from its Green Belt status, refer to Landscape Protection Area policy designations on adjoining land in Bromsgrove District, undulating topography, inclusion of a prominent ridgeline within the area, potential traffic congestion on Windsor Road and A441, and potential foul drainage issues.
- 2.12 As stated above, RPS is aware of the landscape constraints in the area and considers that new structural community woodland on the upper slopes and the ridgeline within the area should form part of the masterplan led approach to planning of the area. Wooded hilltops are characteristic of the area north of Redditch and the site capacity assessment has taken full account of this issue.
- 2.13 The eastern part of the land adjacent to the railway line is a logical extension of the ADR land and forms the lower slopes below the ridgeline. It also abuts the Weights Farm Business Park in Bromsgrove District. The land therefore has urban influences which reduce the visual impact of development. Its location west of the railway line minimises any perception of narrowing of a gap between Redditch and any other settlement.
- 2.14 Assuming the Bordesley Bypass is completed, the roundabout at Weights Lane will become the arrival point at the town from the north and will form the transition between the open Arrow Valley and urban area. Weights Lane would become part of a distributor road system to serve the development area and provide an alternative to Windsor Road reducing any congestion pressures that may otherwise result.
- 2.15 The western part of the land is exceptionally well contained in the landscape where views from the north and north west are screened by Butler's Hill Wood and the ridgeline which is proposed to be kept free from built development screens views from the east.

- 2.16 The comprehensive development of the Brockhill North and East area will allow significant improvement of the foul drainage network. RPS Engineering has prepared a drainage strategy for the area which is being developed in greater detail.
- 2.17 RPS has declared concerns over and criticisms of important aspects of the WYG Second Stage report (WYG2) including its failure to address Green Belt purposes and also adequately consider the sensitivity of the landscape and visual impact of development. The WYG2 approach of discounting consideration of the area on the grounds of the boundary of the Landscape Protection Area within Bromsgrove District relating to a ridge extending south into Redditch Borough is not considered robust. PPS7 discourages the use of local landscape designations, favouring a more character-based approach including consideration of sensitivity to change and the visual impact development may have, having regard too to the potential to mitigate adverse impacts. Clearly, the opportunity exists at Brockhill North and East to accommodate development at a suitable scale without compromising the ridgelines through appropriate mitigation.
- 2.18 FPCR has examined the landscape sensitivity of the area and potential visual impact of development and has concluded that the area is well contained in the wider landscape and that large-scale residential and mixed use development can be satisfactorily accommodated at Brockhill North and East.
- 2.19 It is noted that the Worcestershire Landscape Character Assessment (2004) identifies the area as part of the Wooded Estate lands Character Area where an increase in woodland cover is the strategic objective. This is compatible with the comprehensive approach to development proposed in this area including significant new community woodland areas within the Green Infrastructure for the development. Indeed, this would continue the pattern established by the Brockhill development which has delivered community woodlands as part of the proposals.
- 2.20 As stated above, RPS notes that the Redditch *Revised Development Strategy* paper indicates a capacity of 300 dwellings on the site, allowing for identified constraints. RPS considers this underestimates the capacity of the Brockhill Green Belt area within Redditch Borough which has been cautiously assessed

as 400 dwellings as part of a mixed use approach which addresses constraints in the area. Clearly, greater capacity exists in conjunction with the capacity of the Brockhill ADR land and adjoining Green Belt land in Bromsgrove District (hence a greater overall capacity of some 1,600 to 1,800 dwellings)

- 2.21 The RBC Consultation Paper records that the WYG1 report from December 2007 predicted that there would be no significant positive or negative effects in sustainability appraisal terms if the Brockhill North and East area were developed. RPS concurs that the area would not lead to significant negative effects. However, given the need to deliver major housing growth at Redditch, RPS contends that the ability to integrate new housing, employment and complementary facilities with existing communities within the town, and to extend and improve public transport services to the benefit of the wider area are significant positive effects.
- 2.22 Persimmon agrees with the Revised Core Strategy that the Brockhill Green Belt land is an appropriate location for providing some of the future housing and or employment land required for Redditch, due to its location and accessibility to the town centre and transport links. However, to achieve the most sustainable form of development to the benefit of the proper planning of the area, it is considered that development of adjoining Green Belt land in Bromsgrove District should be undertaken as part of a comprehensive cross-boundary urban extension as identified on Plan RPS3.
- 2.23 RPS Engineering has formulated a drainage strategy for the site in liaison with Severn Trent Water, and also a surface water strategy based on sustainable urban drainage principles whereby peak flows will be attenuated in detention ponds in accordance with Environment Agency requirements.
- 2.24 RPS notes that the Borough Council has concluded that constraints to development in this location can be overcome.
- 2.25 RPS contends that the best approach to the planning of the area is to proceed on the basis of a comprehensive masterplan led approach in the aligned Core Strategies to the Brockhill ADR and Brockhill Green Belt land together with adjoining land to the north in Bromsgrove District. In this context the presentation of the Options in the consultation document could be considered unhelpful

where an implication is given that these areas are all separate sites and may not be treated as a comprehensive entity. Spatial planning demands that planning considerations are integrated effectively. Comprehensive approaches are best able to make efficient and optimum use of land, including the expectation of realising more housing capacity.

- 2.26 The area is being masterplanned currently and RPS and Persimmon will welcome full engagement with the local planning authorities as part of this process.

### **Other Capacity in Redditch Borough**

- 2.27 Although subject to highway constraints, residential development is acceptable at the Webheath ADR.
- 2.28 However, RPS has reservations about the allocation of new housing within the A435 ADR to provide approximately 360 dwellings. This area to the East of Redditch is a thin strip of land comprising essentially of four sites which are remote from the town centre and are not well integrated with existing residential neighbourhoods and lack the scale to create balanced local communities.
- 2.29 It is agreed that the East of Redditch A435 ADR land is developable, as it is flat, well-contained and close to existing road infrastructure, although there is an issue over coalescence with Mappleborough Green which requires careful consideration. It is considered to be more suitable for employment use to contribute towards the Borough's 31 ha minimum employment land requirement to 2026 through the RSS. RPS does not share the WYG2 view that the land should be included in the Green Belt. It is noted that there is land in Stratford-on-Avon District which has also been excluded from the Green Belt at Mappleborough Green in a narrow strip between the A435 and the Redditch ADR land. There is no proposal in the Stratford-on-Avon plan to include this land in the Green Belt and therefore it is not appropriate to follow the WYG2 approach in Redditch Borough.
- 2.30 The WMRSS Panel Report 2009 did not disagree with development on the ADR, but indicated that development in this location on the eastern fringe of Redditch would be limited due to traffic problems on the A435 between Alcester and

Redditch, and therefore would not be strategically significant in terms of future growth.

2.31 Four other potential locations for strategic housing growth are identified in the RBC Core Strategy Revised Development Strategy paper which have been considered and discounted. RPS concurs that these are not suitable options for future housing growth and compare most unfavourably with the areas identified in the Borough to address the 4,000 dwelling requirement to 2026. The rejected options in this context are:

- To extend Webheath ADR into the Green Belt area to the south-west of Redditch – discounted due to infrastructure constraints and sensitive landscape character.
- To develop a new settlement in the Green Belt area to the south-west of Redditch – discounted for many reasons including loss of Green Belt land, infrastructure, unsustainable nature of development, lack of community facilities.
- To extend Astwood Bank and/or Feckenham into Green Belt – discounted due to RSS and Core Strategy Development Strategy of focussing development in and around Redditch.
- To develop extensive areas of existing open space within Redditch – discounted due to loss of open space and harm to residential amenity.

### **Concluding Comment**

2.32 As set out in Section 1, the principal development opportunity at Brockhill North and East is in Redditch Borough, including the ADR land. However, the logical extent of the phased allocation of land in this area includes adjoining land in Bromsgrove District south of Weights Lane and east of Brockhill Lane. This is addressed further in the following section.



### 3. BROMSGROVE

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- 3.1 The WYG2 report recommended discounting all of the Redditch ADR's for housing development, leading to the Redditch Preferred Draft Core Strategy Borough requirement proposal of some 2,400 new dwellings and 27 ha of employment land within the urban area of Redditch, and suggesting the provision of 4,200 dwellings at Bordesley Park to meet the RSS Preferred Option requirement of 6,600 for Redditch.
- 3.2 The WMRSS Panel Report disagreed with the WYG2 recommendation and the Borough Council's position and recommended an increase in the future housing targets to meet existing needs of the town, on the basis that 3,000 homes should be built at cross-boundary locations in Bromsgrove District in addition to 4,000 new homes to be built within Redditch Borough up to 2026 within the urban area, ADR's and Green Belt sites.
- 3.3 The Panel recommended that the locations of these dwellings should be decided locally and not as part of the RSS, albeit the area of search should not include land for housing in Stratford-on-Avon District. Effectively, this narrowed the area of search for cross-boundary housing development to the north western and northern periphery of Redditch.

#### **Consultation Options**

- 3.4 Subsequently, RBC and BDC have examined the area and have identified in the Redditch Growth Consultation Booklet three broad options for the location of growth:
- Foxlydiate/Webheath(including Brockhill West);
  - West of A441 (including Brockhill North and East); and
  - East of A441 (including Bordesley Park).
- 3.5 In respect of employment land requirements, the Panel has recommended, or at least is understood to have recommended that up to 25 ha of employment land is needed to be provided outside of Redditch in Bromsgrove District. A significant proportion of this should comprise the remaining balance of the

committed Ravensbank Business Park as at 1 April 2006 and the Ravensbank Drive ADR which has been safeguarded since 2004 as a suitable location for employment uses related to Redditch. Any balance of the 25 ha requirement can appropriately be accommodated within mixed use urban extensions.

- 3.6 In meeting the residual employment land requirement in Bromsgrove District, there are opportunities to consider within the Brockhill North and East area in the central part of the West of A441 Option area and in a Brockhill West development in the northern part of the Foxlydiate/Webheath Option area. However, the detailed disposition of land uses in these areas requires further review and discussion with the local planning authorities. It is RPS's view that the urban extensions must be planned on a cross-boundary basis applying spatial planning principles, and not slavishly adhering to the rounded housing growth and employment land splits, where greater sustainability can be achieved through careful and considered masterplanning of the most sustainable cross-boundary sites.
- 3.7 Persimmon agrees in principle with the identification of areas of search for land to the north west of Redditch as being appropriate for the development of the 3,000 new homes required in the Bromsgrove area. However, for reasons advanced in response to the previous Core Strategy Preferred options and in evidence to the RSS Examination, RPS and its clients do not consider Bordesley Park (east of A441) or land in the Arrow Valley area between the A441 and the railway line in Bromsgrove District (extreme eastern part of the West of A441 Option area) to be appropriate locations for an urban extension or extensions and object to development in these locations.
- 3.8 In brief, the significant disadvantages of development east of the railway line in Bromsgrove District are:
- Loss of openness through encroachment and sprawl into a sensitive area of Green Belt north of the town perceived as an open lung between Redditch and Alvechurch.
  - Significant narrowing of the gap between Redditch and Alvechurch and hence leading to coalescence contrary to PPG2 policy.

- Complete coalescence between Redditch and Bordesley (unless development restricted to south eastern part of the East of A441 Option area), contrary to PPG2 policy.
- Adverse landscape impact on the sensitive Arrow Valley and Bordesley Park character areas contrary to advice provided by Cooper Partnership to RBC and WYG in the context of the North West Redditch Masterplan exercise between 2002 and 2006.
- Greater likelihood of car borne commuting to Birmingham and Solihull due to location on A441 corridor, of concern to the RSS Panel who recommended that Policy SS11 include ***"Greenfield extensions will need to be located as far as possible to minimise the likelihood of migration from and car-borne commuting in relation to the MUA"***.
- Poorer integration with the existing urban area of Redditch, where there is less scope for new development achieving community benefits to the wider area (as for example can be achieved through the routing of public transport services and provision of a local centre in the Brockhill North and East area, and potentially a new primary school, which would benefit the existing Brockhill area as a result of development).

3.9 It is noted that the consultation document refers to Bordesley Park as being close to Redditch town centre, it is however further away than land at Brockhill East. As stated above, its strategic accessibility to the M42 should not be seen as an advantage. Progression of the Bordesley Bypass is not dependent upon the selection of the Bordesley Park (East of A441 Option) as implementation policies can secure contributions as appropriate from any selected site.

3.10 RPS considers that there are containing features for the Brockhill North and East development associated with Weights Lane and Butler's Hill and its woodland to the north and the railway line to the east. There are clear opportunities to create a well designed edge to the town which respects the landscape. The existing Brockhill development has been designed, approved and implemented to be extended both eastwards and westwards. Development to the north east of Brockhill is an entirely logical direction for growth.

- 3.11 As explained in this submission, the masterplanning of the area should recognise that there is capacity for further growth to the west of this area and north of the Brockhill West area, in the area south of Butler's Hill Wood, where longer term development can link planned urban extensions without unacceptable adverse impact on the Green Belt.
- 3.12 In reference to the wider West of A441 Option area, RPS considers that land east of the railway should be regarded as a discrete area where Green Belt considerations are significantly different and where openness and coalescence are particularly significant issues. The area shares the characteristics of Bordesley Park as being more likely to encourage migration from and car borne commuting related to the MUA.
- 3.13 The ADR land in Redditch Borough east of the railway is considered suitable to provide an opportunity to create an employment 'gateway' investment location on the northern approach to Redditch, adjacent to the planned roundabout junction between the A441 Bordesley Bypass, Weights Lane and the current A441 and Dagnell End Lane.
- 3.14 Accordingly, it is concluded that the prime areas of search for urban extensions of Redditch into Bromsgrove District are land at Brockhill North (in association with land at Brockhill East in Redditch Borough) and within the Foxlydiate/Webheath Option area north of the A448 (as explained in separate representations by RPS on behalf of Miller Strategic Land, Southern & Regional Developments and Persimmon Homes).
- 3.15 Both of these locations should be comprehensively planned on a cross-boundary where there are clear beneficial opportunities for the provision of infrastructure and public transport links.

### **Green Belt Review**

- 3.16 In November and December 2009, RPS in conjunction with FPCR undertook a Green Belt Review to assess the importance of land around the north side of Redditch, straddling the boundary, for Green Belt purposes and considering the areas' potential for accommodating a sustainable urban extension(s). This assessed all potential land from Webheath in the west to Mappleborough Green

in the south-east. The study, on very cautious assumptions, identified a capacity of some 1,800 dwellings at Brockhill North and East overall and up to 2,000 dwellings on land at Brockhill West. The former figure includes the full area of land between Brockhill West and the railway line where it was concluded land may appropriately be removed from the Green Belt. For the period to 2026, Persimmon proposes that the development allocation at Brockhill North and East, including the ADR land west of the railway line, should be as shown on Plan RPS3 and have a capacity of approximately 1,850 dwellings including some 1,000 dwellings in Bromsgrove District and 850 in Redditch Borough, making efficient use of the developable areas.

- 3.17 There will be potential for further development to the west, between the Brockhill West and Brockhill North and East areas beyond 2026 on land proposed as a new ADR consistent with PPG2 policy on safeguarding land.
- 3.18 The Green Belt Review concluded that development on land within the option east of the A441 at Bordesley Park would be inappropriate to provide a large urban extension for reasons identified above. Only part of the land is considered potentially acceptable for release from the Green Belt in the south east of the Option area where landscape and Green Belt encroachment and coalescence concerns would be reduced.
- 3.19 The Arrow Valley between A441 and the railway line north of weights Lane, which is highly sensitive and visually significant, should also remain in the Green Belt. Residential development in the Arrow Valley would therefore be inappropriate and would also result in urban sprawl, encroaching into the countryside and narrowing the gap between Redditch and Alvechurch.
- 3.20 The study concluded that development within the areas of Webheath ADR and Foxlydiate Green Belt would be well contained and screened by existing mature vegetation and undulating topography, with wooded areas to the north. An urban extension to the North West of Redditch, including land at Brockhill East, and also Brockhill West, has the potential to expand the existing green infrastructure already established in the Borough through the retention of green corridors along the Red Ditch and Batchley Brook valleys, and linking the existing areas of woodland. Additionally, due to the gap between Redditch and the surrounding villages of Blackwell and Alvechurch being of a substantial size,

an urban extension development in this location will not significantly reduce the gap.

- 3.21 The Green Belt Review identifies an appropriate long term Green Belt boundary (Plan RPS2 refers). Land within the boundary, not required for allocation in the period to 2026, should be designated as ADRs in accordance with PPG2.

### **Conclusion**

- 3.22 Persimmon concludes that the option for development at Brockhill North and East (ie the central part of the West of A441 Option) is a highly appropriate and sustainable location for the delivery of new housing required in Bromsgrove on the edge of Redditch, which will complement the Brockhill West development, whereby together they can fully accommodate the 3,000 dwellings requirement in Bromsgrove District, split roughly 2,000 at Brockhill West and 1,000 at Brockhill North and East.
- 3.23 The Brockhill North and East area can deliver a comprehensive sustainable urban extension, on a cross-boundary basis. The land has been assembled and is being promoted by a house-builder with considerable experience in delivering large scale mixed use urban developments. There are no significant constraints to the masterplanning of the area and the delivery of development. The site promoters have demonstrated a commitment to work with the local authorities and interested stakeholders in the area over a considerable period.
- 3.24 The parties promoting Brockhill North and East and Brockhill West are collaborating fully and are both represented by RPS.

## 4. CONCLUSION

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- 4.1 In conclusion, Persimmon supports the basis of the current consultation exercise which seeks to formulate a spatial strategy for Redditch based on the RSS Panel's recommendations on a cross-boundary and aligned basis.
- 4.2 To deliver some 4,000 dwellings and associated employment land and facilities by 2026 will require appropriate use of the ADR land in the Borough including land at Brockhill East. However, there is also acceptance that areas of Green Belt north of the town within the Borough require to be allocated for development to meet the identified strategic requirement, comprising areas of land north of the Brockhill ADR and also at Brockhill West (Foxlydiate).
- 4.3 It is considered that the A435 ADR land to the east of the town is less suitable for housing development compared with the Brockhill and Webheath ADRs. Due to its remoteness from the town centre and less good integration with existing residential areas, it is considered better used to meet employment land needs in the Borough or safeguarded for the longer term in conjunction with adjoining land in Stratford-on-Avon District also west of the A435. Locations for meeting that ADR's estimated capacity of 360 dwellings can be identified within the Brockhill North and East and Brockhill West areas to ensure the full 7,000 strategic requirement can be delivered on a cross-boundary basis.
- 4.4 Significantly, both the Green Belt areas in Redditch Borough where development is required are in locations where logical and sustainable cross-boundary developments can be masterplanned and delivered at Brockhill West and Brockhill North and West. The combined areas have the capacity to meet the 3,000 dwellings requirement in Bromsgrove District to 2026 to meet Redditch related needs.
- 4.5 The Foxlydiate Green Belt land within the Brockhill West area has a capacity for some 230 dwellings. However, RPS commends a masterplan led approach to the wider cross-boundary area whereby land uses are identified without the constraint of the Borough boundary and are determined on the basis of spatial planning principles.

- 4.6 Brockhill North and East is a highly appropriate location for meeting some 1,000 dwellings of the additional 3,000 new homes needed in cross-boundary locations within Bromsgrove district on the periphery of Redditch. The area, planned comprehensively with adjoining land in Redditch Borough can deliver homes, a local centre, potentially a new primary school, and Green Infrastructure as well as all necessary road, footpath and cycleway links to serve the development and integrate it fully with existing urban area.
- 4.7 It is vital for joint working between the local authorities to ensure that Redditch's growth is planned comprehensively and is appropriately implemented.
- 4.8 The Redditch Growth Consultation documents have identified the release of the Brockhill ADR and Green Belt land in Redditch Borough as necessary for the provision of the 4,000 new homes, as the urban area does not have the capacity to provide all of the Borough's housing allocation share.
- 4.9 The consultation booklet has also identified three growth options to locate the further 3,000 required dwellings in Bromsgrove District. Of these, one is north of the Brockhill ADR and Green Belt sites (West of A441). However, RPS considers that the railway line forms a strong boundary whereby land in the Arrow Valley to the east of the railway and north of Weights Lane comprises an important open area within the Green Belt which should remain open on the main A441 approach to the town from the north whereas the land west of the railway is less significant in Green Belt terms and is better contained and better integrated with the existing urban area. This sensitive area extends the Arrow Valley Park green lung through the town. It is particularly important in separating Redditch from Alvechurch and Bordesley.
- 4.10 A second broad location which has clear merit for cross-boundary growth is at Foxlydiate, north of the A448, where an urban extension at Brockhill West offers considerable scope for integrated expansion of Redditch within the contained Batchley Brook valley area. Land to the south of the A448 should be treated discretely from the Brockhill West area, being separated by the A448 dual carriageway.



- 4.11 These two cross-boundary locations are considered to be acceptable for development and are the most sustainable locations around Redditch for future housing growth.
- 4.12 As assessed by the RPS/FPCR Green Belt Review, the Brockhill North and East and Brockhill West areas are concluded not to fulfil Green Belt purposes to the same extent as other locations, for example at Bordesley Park.
- 4.13 Land at Ravensbank Drive, to the north east of Redditch, is appropriate to meet most of the cross-boundary employment land requirements for Redditch in Bromsgrove District. Any residual balance of the cross-boundary employment land requirement can be included within comprehensively planned urban extension allocations.
- 4.14 RPS respectfully requests that this representation be considered as justification for the allocation of the Brockhill North and East development within the West of A441 Option area as the most appropriate location for an urban extension for meeting some 1,000 dwellings towards the Bromsgrove District requirement to meet Redditch related needs, in conjunction with some 850 dwellings on adjoining land in Redditch Borough.
- 4.15 The Bromsgrove Core Strategy should identify new ADRs for potential development needs beyond the plan period in accordance with PPG2 advice. The recommended Green Belt boundary at Redditch is identified on Plan RPS3 which is taken from the RPS/FPCR Green Belt Review Study (December 2009).
- 4.16 Persimmon is committed to working together with Redditch Borough and Bromsgrove District Councils to deliver comprehensively planned and implemented development to meet the planned growth needs in the area for which exceptional circumstances have been identified for development in the current Green Belt through the RSS process.
- 4.17 RPS and its clients request recognition as key stakeholders in the proper planning of the area and request to be engaged by the Local Planning Authorities in the plan making process.

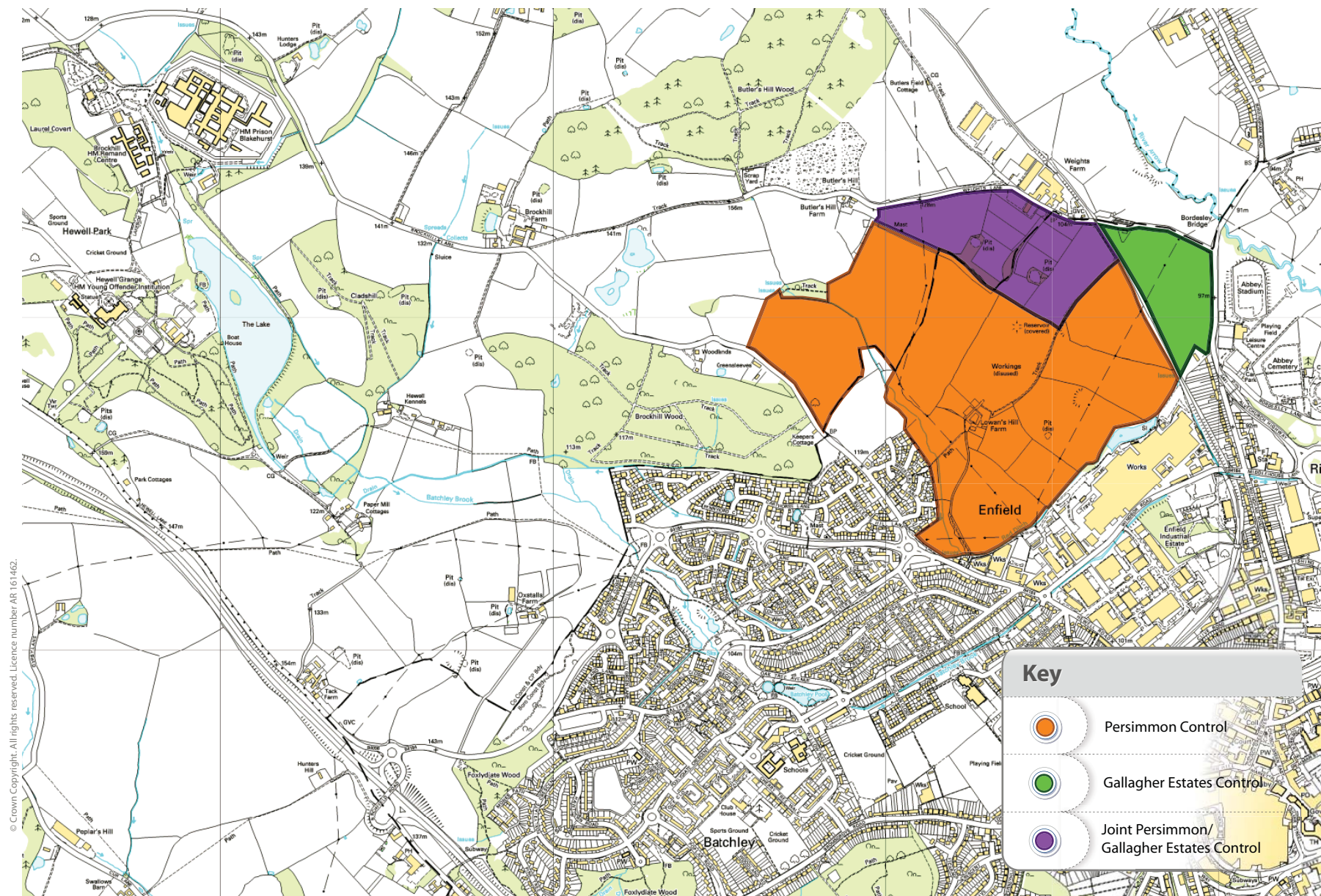
## **PLANS**

**RPS1 BROCKHILL NORTH AND EAST: LAND CONTROL**

**RPS2 RECOMMENDED GREEN BELT BOUNDARY REVIEW**

**RPS3 SUGGESTED BROCKHILL NORTH AND EAST URBAN EXTENSION BOUNDARY**

## **RPS1 BROCKHILL NORTH AND EAST: LAND CONTROL**



REF: JBB7320  
 CLIENT: Persimmon Homes  
 DATE: March 2010  
 STATUS: Final

CHECKED BY: MS  
 DATE CHECKED: 17/03/10  
 REVISION: 00  
 PREPARED BY: JP

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## **RPS2 RECOMMENDED GREEN BELT BOUNDARY REVIEW**



# Development Capacity

**A** Total Site Area = 44.7ha  
Estimating 50% developable area, 22.35ha @35dph =782 dwellings

**B** **B1** = 101ha Estimating 50% developable , 50.9ha @35dph = 1782 dwellings

**B2** = 133ha Estimating 50% developable, 66.5ha @35dph = 2327.5 dwellings

**B combined** = 234ha (117.4ha developable @ 35dph = 4109.5

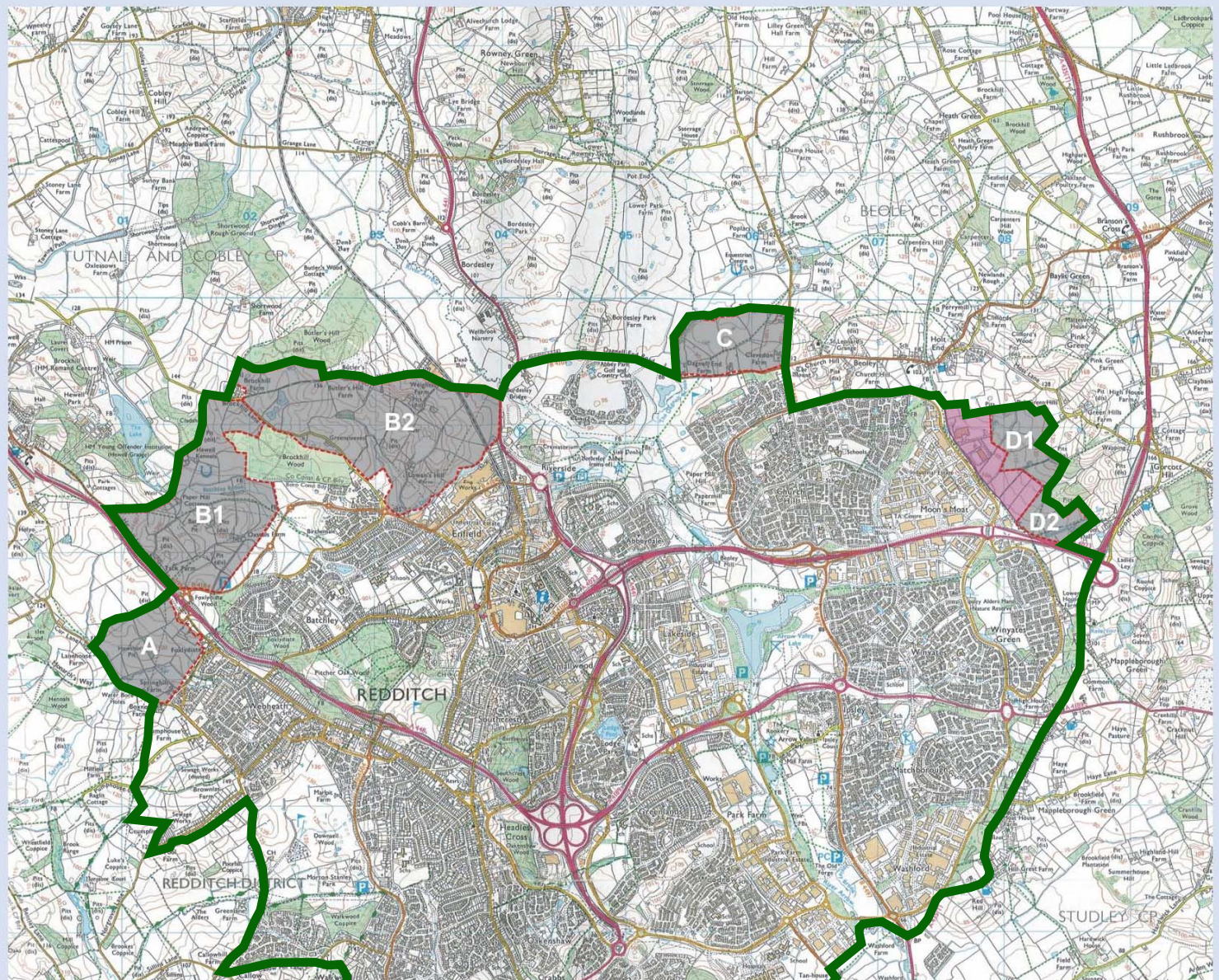
**C** Total Site Area = 38.04ha  
Estimating 50% developable area, 19.02ha @35dph = 666 dwellings

**D** **D1** = 20.17ha Estimating 50% developable area, 10.08ha

**D2** = 9.3 Estimating 50% developable area, 4.6ha

**Ravensbank Business Park (Built and Allocated Land) = 28ha**

**Recommended Green Belt Boundary**



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SCALE: NTS

REF: JBB7320  
CLIENT: Persimmon Homes  
DATE: March 2010  
STATUS: Final

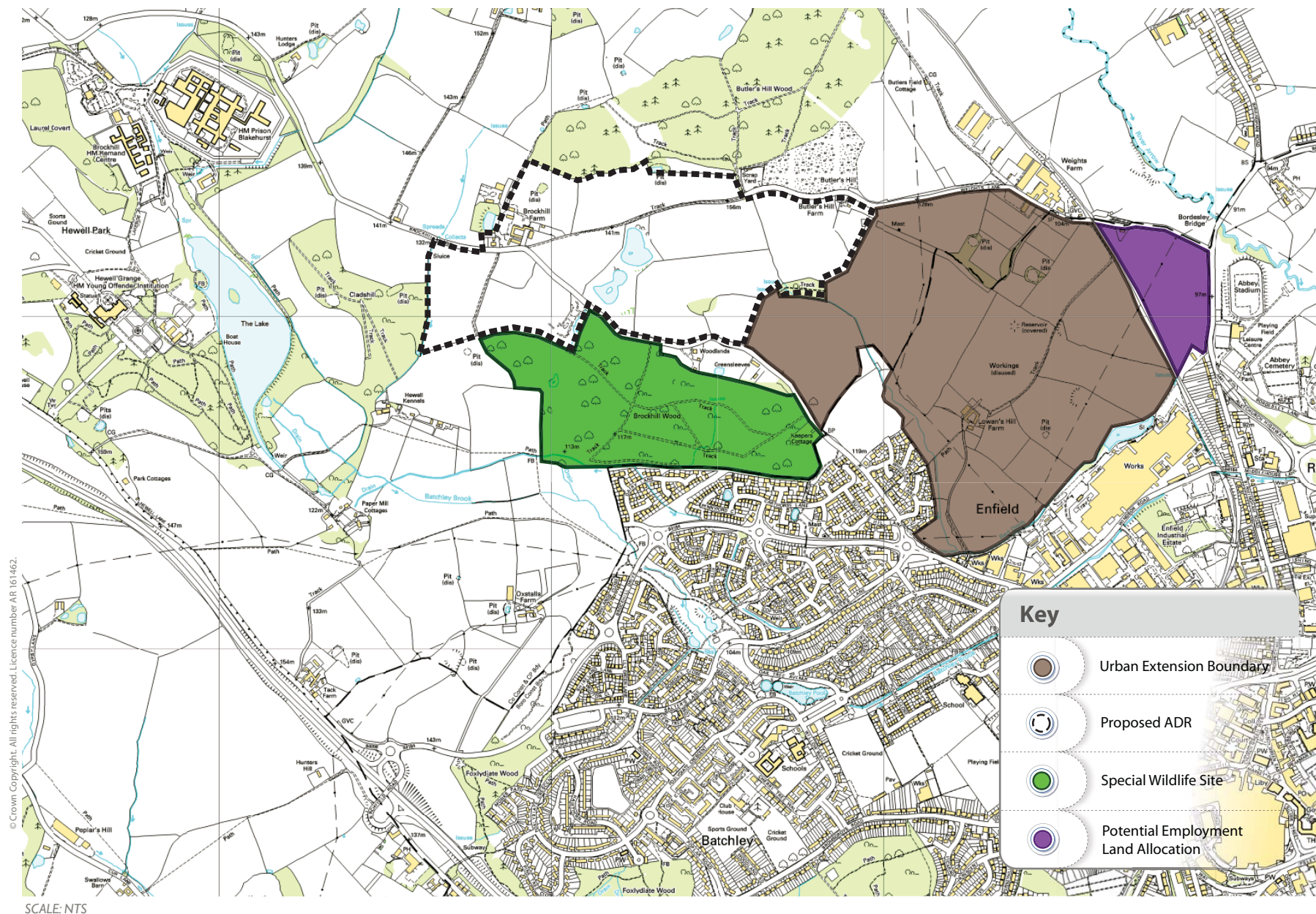
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**RPS3 SUGGESTED BROCKHILL NORTH AND EAST URBAN EXTENSION BOUNDARY**



REF: JBB7320  
 CLIENT: Persimmon Homes  
 DATE: March 2010  
 STATUS: Final

CHECKED BY: MS  
 DATE CHECKED: 17/03/10  
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