

Housing Growth Consultation Response Form

Bromsgrove District Council and Redditch Borough Council would like to hear your views on the locations chosen and policy produced regarding future development around Redditch. Please specify if possible which part of the leaflet or supporting documents you are commenting on, including the page and paragraph number.

Responses can be submitted online or copies of the response forms are available on the Consultation website www.bromsgroveandredditchplanning.co.uk or responses can be submitted by email or by post at the addresses below:

The Strategic Planning Team

Planning and Regeneration
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire B60 1AA

Tel: 01527 88 1323/1316

Or email: consultplanning@bromsgroveandredditch.gov.uk

Or in person at The Council House or Customer Service Centre (The Dolphin Centre) in Bromsgrove or the Town Hall in Redditch.

**Please let us have your views
by no later than:**

Wednesday 15th May 2013

*Please note that responses cannot be treated
as confidential and will be recorded within
public consultation documentation.*

Development Plans

Redditch Borough Council
The Town Hall
Walter Stranz Square
Redditch
Worcestershire
B98 8AH

Tel: 01527 64252 ext.3081



**Bromsgrove
District Council**
www.bromsgrove.gov.uk

REDDITCH BOROUGH COUNCIL



www.redditchbc.gov.uk



Please enter your name and address below:

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Please tick here if you would like to be added to the Council's
databases to be informed of any future stages of Plan preparation ☐

What do we want to know?

Do you agree with the chosen areas for the new development?

Please explain your views fully

PLEASE SEE ATTACHED REPORT

Do you agree with the policy produced to deliver these developments? *Please explain your views fully*

PLEASE SEE ATTACHED REPORT

If you don't agree with the areas or the policy, what alternatives can you suggest? *Please provide evidence to support your suggestion*

PLEASE SEE ATTACHED REPORT

Any other comments? *Please continue on a separate A4 sheet if necessary*

PLEASE SEE ATTACHED REPORT

Thank you for taking part in this consultation.

For Office use

Date Received

Response ref



**BROMSGROVE DISTRICT COUNCIL & REDDITCH
BOROUGH COUNCIL**

HOUSING GROWTH CONSULTATION

**REPRESENTATIONS ON BEHALF OF PERSIMMON
HOMES SOUTH MIDLANDS, IN RESPECT OF**

LAND AT BROCKHILL EAST

MAY 2013

15 May 2013

Our Ref: JBB7320.C1357

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QUALITY MANAGEMENT

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Date:	13 May 2013
Project Number/Document Reference:	JBB7320.C1357

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1 INTRODUCTION

- 1.1 RPS Planning & Development (RPS) has been retained by Persimmon Homes South Midlands (Persimmon), who control land at Brockhill East, to make representations to the Housing Growth Consultation being held by Bromsgrove District Council and Redditch Borough Council. Persimmon has interests in land to the east, west and north of Brockhill, Redditch. The landholdings straddle the Redditch Borough boundary with Bromsgrove District lying to the north west of Redditch between the A448 in the west and the railway line in the east (Plan RPS1 in Appendix 1).
- 1.2 Previous representations were made on behalf of Persimmon to the Redditch Growth consultation in March 2010, a consultation which was run jointly by Redditch and Bromsgrove Councils identifying the need for a contribution of some 3,000 dwellings to be provided in Bromsgrove District on the edge of the Redditch urban area to meet the needs of the town. Representations were also made on the Revised Draft Preferred Strategy for Redditch Borough in March 2011.
- 1.3 RPS has also made separate representations on behalf of Persimmon to the draft Local Plan No 4 in relation to land at Brockhill East and also for Persimmon jointly with Miller Strategic Land and Southern & Regional Developments in relation to comprehensive proposals at Brockhill West for inclusion within the Redditch Plan as a strategic allocation where cross-boundary development is planned into Bromsgrove. This is commended as a more sustainable and deliverable alternative to the less sustainable and undeliverable proposal south west of A448 as currently proposed.
- 1.4 This submission relates to land at Brockhill East and Brockhill North in respect of the cross-boundary growth areas consultation. It focuses on support for the Site 2 proposal at Brockhill East and the omission of a designated Area of Development Restraint or 'safeguarded land' at Brockhill North which can appropriately be excluded from the Green Belt under NPPF policies on Green Belts.
- 1.5 These representations follow a Green Belt Review Study undertaken by RPS and FPCR in 2009¹ on behalf of Miller Strategic Land, Southern & Regional Developments and Persimmon that filled a gap in Redditch Borough's evidence base to assess the Green Belt implications of potential locations for cross boundary expansion of Redditch.
- 1.6 The support for Site 2 also is based on the aforementioned Study.
- 1.7 Persimmon welcomes the acknowledgement by both Councils that cross boundary growth is required to meet the housing and employment needs of Redditch Borough in the plan period, and that the exceptional circumstances have been demonstrated that Green Belt releases are justified.

¹ Redditch Green Belt Review, December 2009. RPS Planning and Development and FPCR

2 REPRESENTATIONS

Q1. DO YOU AGREE WITH THE CHOSEN AREAS FOR THE NEW DEVELOPMENT?

- 2.1 The brief answer to this question is partly 'yes' and partly 'no'.
- 2.2 Persimmon agrees that the Site 2 (Brockhill East) is an appropriate and logical extension of the urban area. As set out in separate joint representations Persimmon raises significant objections to the omission of Brockhill West from the 'chosen areas' and to the scale and extent of the Site 1 proposals. The eastern central part of the Site 1 area has some merit to meet part of the cross boundary growth needs, it is considered this applies only in conjunction with parallel proposals at Brockhill West where suitable connectivity can be created. The north western and south western 'wings' of Site 1 are concluded to be very intrusive into the Green Belt, the former causing coalescence risk with Tardebigge and Bromsgrove and both representing uncontrolled sprawl and unacceptable encroachment into the countryside.

SITE 2

- 2.3 Site 2 accommodates a modest extension of some 600 to 670 dwellings to the Brockhill East Strategic Site identified in the Draft Redditch Local Plan No 4. The Brockhill East site has the benefit of being part delivered, with the remainder subject of masterplanning exercises and being the subject of advanced pre-application discussions. The Brockhill East site will take development to the RBC boundary; its location close to the town centre and to existing and planned employment mean that it is entirely logical to look beyond it into the Green Belt for additional development land. The borough boundary is uneven and Weights Lane provides a clear, strong and defensible boundary.
- 2.4 Both the aforementioned 2009 RPS/FPCR Study and the Councils' own January 2013 Development Study supported its development. The 2009 Study appraised a slightly differently configured area to that of proposed Site 2. However, the general appraisal noted that it was well-contained in landscape terms so that encroachment would be minimised. Moreover it provides an opportunity to integrate well with existing and planned new development at Brockhill East at a peripheral location close to the town centre which can form a cohesive new neighbourhood centres on the planned relocation of the Holyoakes First School, playing fields and a new district centre. The access strategy for the site has been well conceived since the 'North West Redditch Master Plan' exercise undertaken in the early 2000's which contemplated the comprehensive development of the area including a potential link road through to Weights Lane in the north.
- 2.5 The Councils' January 2013 Development Study found that of the five 'weaknesses' to the Site, two would be common to all the sites appraised in the loss of agricultural land and Green Belt land. The three other weaknesses (topography, high landscape sensitivity and loss of wooded estatelands) are manageable in that they do not constrain the whole area and development can be accommodated appropriately with sensitive urban design treatment including the establishment of ridgeline woodland planting which is characteristic of the area to the north of Redditch..

- 2.6 The 2013 Study identified that Site 2 is a particularly sustainable location, having few technical and environmental constraints and none that are insurmountable, and allowing a strongly defensible revised Green Belt boundary for the future along Weights Lane to the north.
- 2.7 RPS takes issue with the strength of the Green Belt boundary to the west of Site 2 and advocates that safeguarded land be identified as a new Area of Development Restraint (ADR) at 'Brockhill North' with Weights Lane and Butlers Hill Wood as the southern Green Belt boundary and Cladshill Wood as the eastern Green Belt boundary and the western edge of the ADR.
- 2.8 Persimmon, therefore, strongly supports the identification of Site 2 for development and commends the additional designation of an ADR to safeguard land for potential longer term growth needs at Redditch in accordance with national planning policy on Green Belts.

SITE 1

- 2.9 As stated above, Persimmon has significant objections to the development of this proposal in respect of scale and extent. The Companies have concerns over the identification of significant parts of the land included within Site 1 (see separate joint submission on behalf of Miller Strategic Land, Southern & Regional Development s and Persimmon Homes).

Q2. DO YOU AGREE WITH THE POLICY PRODUCED TO DELIVER THESE DEVELOPMENTS?

- 2.10 RPS questions the rationale for a requirement of 40% affordable housing in the cross-boundary areas of development. The Redditch Borough requirement proposed in the Local Plan No.4, based on assessment of need and viability considerations is a reduced level of 30%. The infrastructure requirements of large scale urban extensions are significant and cannot be expected to allow delivery of affordable housing at a rate higher than that expected on adjoining land within Redditch Borough.
- 2.11 An affordable housing requirement percentage of 30% is considered more appropriate, being consistent with the rate proposed by Redditch Borough Council.

Q3. IF YOU DON'T AGREE WITH THE AREAS OR THE POLICY, WHAT ALTERNATIVES CAN YOU SUGGEST?

- 2.12 As set out in separate joint representations, Persimmon contends that there is a more logical, sustainable site at Brockhill West which is less harmful to Green Belt purposes than utilising the majority of Site 1.
- 2.13 In Persimmon's view a combination of Brockhill West, Site 2, and a reduced Site 1 would most sustainably achieve the requirements for the cross boundary provision.
- 2.14 If the Local Planning authorities are concerned that further land is required to deliver the required level of homes, due to capacity concerns at Brockhill West, Persimmon has control of additional land at Brockhill North which should be excluded from the Green Belt and which could be added to the plan period allocation if required.

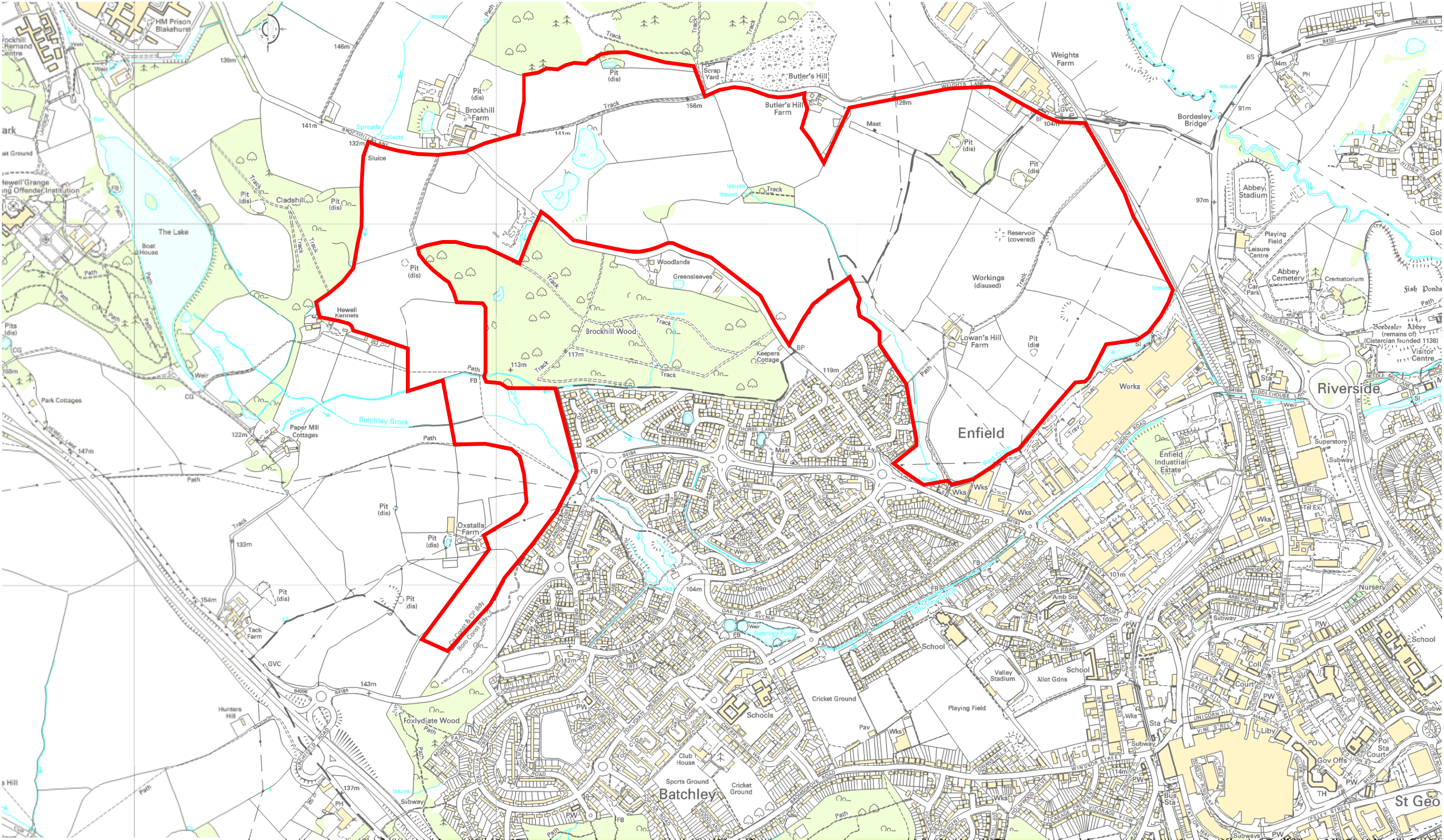
Q4. ANY OTHER COMMENTS?

- 2.15 The 3,400 dwellings cross-boundary requirement can best be achieved in RPS's view by a combination of:

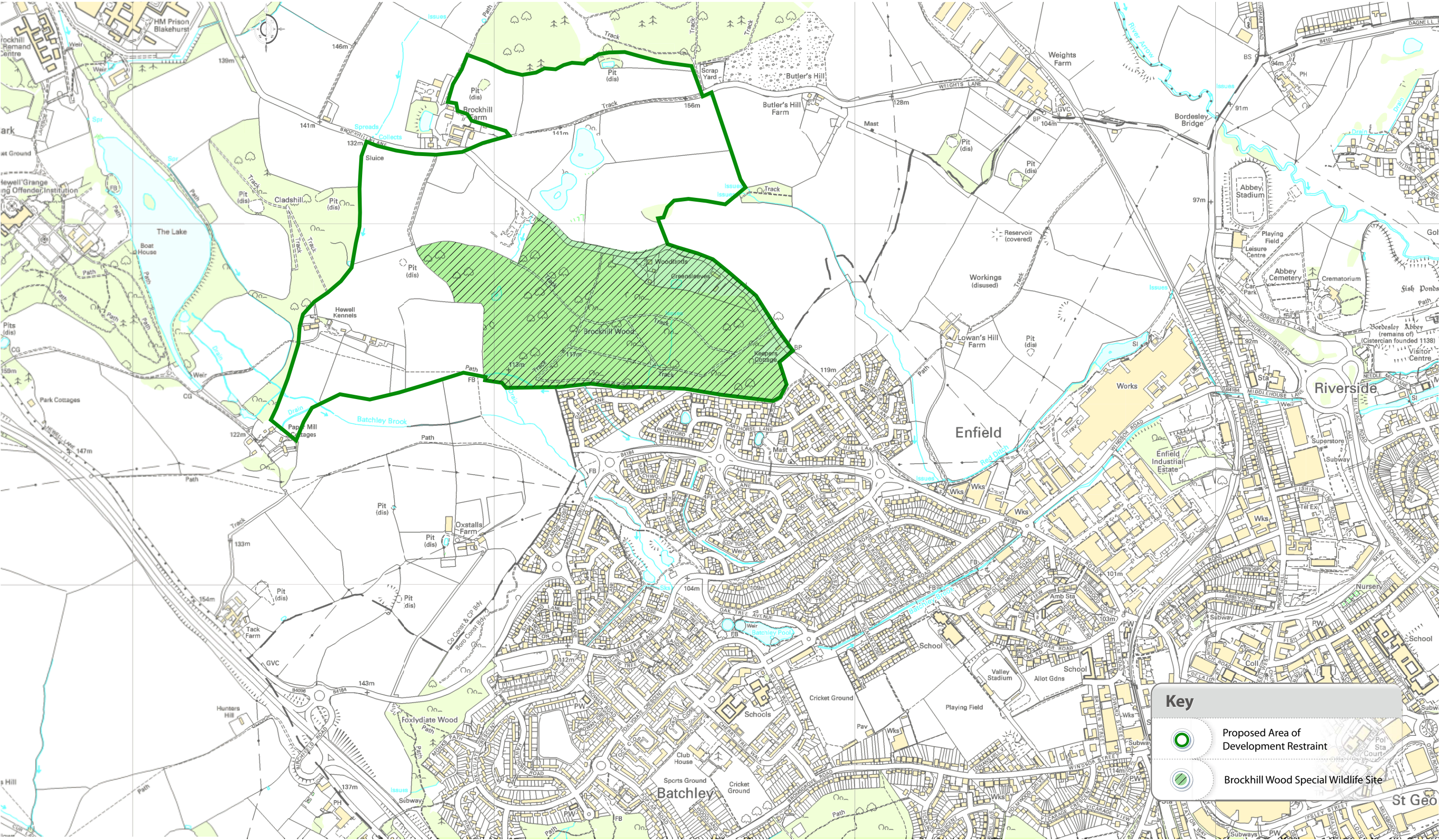
- some 650 dwellings at Site 2 (Brockhill East) in conjunction with a contribution for a planned third form of entry to be added to the relocated Holyoakes First School in the proposed allocation at Brockhill East in Redditch Borough, and extensive green infrastructure including woodland planting, sustainable urban drainage system and amenity open space and play areas;
- some 1,200 dwellings at Brockhill West in conjunction with a new 1 form of entry first school, a district centre and extensive green infrastructure including woodland planting, sustainable urban drainage system, recreation areas and a suitable buffer to the Hewell Grange Conservation Area and Historic Park & Garden; and
- some 1,550 dwellings in the eastern central part of Site 1 at Foxlydiate, representing land that can suitably be removed from the Green Belt and equating to a deliverable proposal in the plan period as promoted by Heyford Developments. The social infrastructure can be provided through this scale of development which would benefit the wider Web Heath area without a significant adverse effect on the Green Belt or wider landscape character of the area.

- 2.16 As identified in the RPS/FPCR Green Belt Review Study of December 2009, there is a compelling case for identifying an Area of Development Restraint (ADR) at Brockhill North to the west of Brockhill East (Site 2) and north of the Brockhill West proposed site. Clearly defensible and strong boundaries can be defined which would not lead to unacceptable sprawl or encroachment and would avoid risk of coalescence with nearby settlements.
- 2.17 Safeguarding land has been part of the national planning policy on Green Belt for many years and has formed part of successive Structure Plans for Hereford & Worcester and latterly Worcestershire. Green Belt policy relies on permanence and where exceptional circumstances justify altering the boundary, consideration must be given to defining an enduring boundary which will not require to be reviewed at the end of the plan period.
- 2.18 NPPF paragraphs 83 to 85 emphasise the importance of the permanence of Green Belts and in considering the need to promote sustainable patterns of development. Paragraph 85 in particular refers to safeguarding land in order to meet longer-term development needs stretching well beyond the plan period and to LPAs satisfying themselves that Green Belt boundaries will not need to be altered at the end of the development plan period. Boundaries should be defined clearly, using physical features that are readily recognisable and likely to be permanent.
- 2.19 The proposals by Persimmon shown on Plan RPS2 in Appendix 1 satisfy these criteria in the NPPF.
- 2.20 Brockhill North can be a logical and sustainable, longer term extension of the Redditch urban area, complementing proposals for Brockhill East (Site 2) and Brockhill West (counter-proposal to parts of Site 1) which can be delivered in the Plan period to 2030.

APPENDIX 1: PLANS RPS1 AND RPS2 SITE LOCATION PLANS



SCALE: NTS



SCALE: NTS