REDDITCH HOUSING GROWTH PLAN

REVIEW OF BACKGROUND DOCUMENTS AND SUSTAINABILITY APPRAISAL WITH OBJECTIONS

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THIS DOCUMENT IS AN OFFICAL OBJECTION IN ITS ENTIRETY, AND AS SUCH IS NOT TO BE SUMMARISED, CONDENSED OR EDITED IN ANY WAY

Introduction

This document forms my official objection to the Redditch Housing Growth Plan, and is being submitted as evidence for the consultation process taking place on this.

I have reviewed the Housing Growth Background document, the Housing Growth Sustainability Appraisal document, and referenced many of the additional evidence papers and reports.

The format of this document broadly follows that of the original documents above. Firstly, the Housing Growth Background document is reviewed; subheadings in **bold** *reference the aspect of the document being questioned or objected to, and the text below includes the reasons why, together with supporting evidence. Extracts from the original document are shown in* 'standard text', *with my comments/objections in* *italic.*

The same format is then continued with the Sustainability Appraisal document.

Revised SA matrices are included at the end of the Sustainability Appraisal review, which reflect corrected SA scores, based on the review of both documents.

A conclusion then follows which summarises the effect of these corrections, and the impact it has on the choice of sites being proposed during the consultation, together with details of the revised proposals.

Finally, some supporting data is included in the Appendix, referenced from the original evidence documents.

Please note that this document in its entirety forms my objection to the Housing Growth Consultation, and as such should not be summarised, edited or condensed in any way. I expect the document to be available in full for the Inspectorate stage of this process.

REVIEW OF HOUSING GROWTH BACKGROUND DOCUMENT JANUARY 2013

Area 4 (Foxlydiate initial appraisal)

Section 3

'Development on the western side of Redditch will also lead to traffic flows towards Bromsgrove which may help to improve the vitality and viability of both Town Centres'.

But it also improves viability for travelling past Bromsgrove and on to M42, towards Birmingham and beyond – in fact WCC anticipate significant uplift in traffic on this route as part of their review of infrastructure capability to cater for the housing growth proposa, so this statement is invalid.

Section 6

'Possible coalescence with Tardebigge dependent upon the level of growth in Area 4 however Tardebigge is not a settlement with a village envelope on the Bromsgrove Proposals map'.

A village envelope should not preclude the effect of coalescence on a settlement. What about coalescence with Foxlydiate – or rather the complete swallowing up of the area known as Foxlydiate; there is no mention of this - or is that not important as it is within the Redditch boundary?

'Potential for strong greenbelt boundaries to be defined with the area containing a number of defining features'.

So what exactly are these defining features? Why are they not detailed? The site will be highly visible from the south, and also from along the Bromsgrove Highway, so the 'good containment possible from the north' is not correct.

Section 7

'There is some potential to connect a development in this area with the existing urban form of Redditch given its close proximity to the Webheath ward, however this would be dependent on access issues being resolved'.

Given that Webheath already has access issues with its poor infrastructure, how can it be easier to 'connect' than Bordesley would be? If there is a major dependency on access issues being resolved, why is this not seen as a major stumbling block? One of the major factors supposedly against Bordesley is the bypass, which is in fact included in a developer submitted master plan for Bordesley. There is no such submission for Area 4, so how can it be recommended by Officers ahead of Bordesley?

Section 8

Suggesting that development in this area will result in capacity pressures on the A38 re-enforces the fact that houses in this location would be prime commuters up to the A38 and beyond to the M42, rather than favouring 'local' employment.

Area 8 (Bordesley Park) Initial Appraisal

Section 2

'The area is 5.1km from Town Centre'. *This is incorrect. From centre of site, train station 3.7km (car) 3.2km (foot), town centre car parks 4.18km, Church Green by foot – 2.8km.*

Section 3

'With Alvechurch and Church Hill District Centre being the nearest local retail and community facilities, development in this area could potentially have a positive impact on the vitality and viability of these local facilities; however this would only be marginal due to the distance'.

The distances are virtually identical to those for Foxlydiate to Redditch/Bromsgrove, but the initial appraisal for Foxlydiate suggests that it will definitely have an impact on both Town Centres – why has the impact been assumed to be different between these two sites?

Section 6

'Development is likely to be visually prominent when viewed from surrounding areas due to the topography and general openness of the area'.

The site is not visible at all when coming in to Redditch from Alvechurch/Bromsgrove as it sits behind the higher ground of Rowney Green. It is no more visible from the 'Redditch' side than any development would be on area 4 (Foxlydiate). In actual fact, you will see the Foxlydiate development when coming in to Redditch from Bromsgrove, as well as from the Redditch side, so Foxlydiate is actually visible from more surrounding areas than the proposed Bordesley site.

Section 7

'There would be a physical separation of the area from Redditch Town due to the location of Arrow Valley Park, making it difficult to successfully integrate the area in to Redditch's urban area'.

This is not a valid statement. It could equally be said that Redditch Golf Club acts to separate Webheath/Foxlydiate from Redditch Town. The Arrow Valley Park virtually dissects Redditch in two already – so to suggest that development at Bordesley would be any more difficult to

integrate in to the urban area is simply not a valid comment. Are you suggesting that other Redditch locations such as WInyates or Matchborough are not integrated because they are on the east side of the park, and the 'Town Centre' is on the west side? Residents on a Bordesley development would in fact be closer to the Town Centre than those in both Matchborough or WInyates, so it could be argued they would be more integrated.

Section 8

The likelihood of a heavy reliance on car transport is actually realistically less than for Area 4 (Foxlydiate), in fact routes to the Town Centre are more direct and would most likely be an easier option for walking than those from area 4 to the Town Centre, for which the dual carriageway link forms the most viable route.

Area 11(Bordesley West) Initial Appraisal

Section 5

'There are a number of narrow country lanes which would require significant upgrading to accommodate additional traffic flows. This could mean there may be significant infrastructure costs'.

Why is this factor not mentioned in the initial appraisal for Area 4 (Foxlydiate)? Area 4 has just as many narrow country lanes, as does the surrounding area of Webheath, but these are not mentioned at all. The Webheath ADR, which forms part of Area 3 has no main roads at all to link it with the rest of the Town, and despite major local concerns being raised regarding this fact, any claim that this will be an issue for large scale development has been ignored. Any arguments put for or against a site must be made with consistency across all sites.

Area 4 (Foxlydiate) Focussed Appraisal

Accessibility

The document states that there are 3 bus services running within 1km of the site, yet it fails to state that the nearest bus stop is 1.4km from the centre of the site, or 1.8km from the furthest point of the site, which is the measurement basis used in other site focusses appraisals. This is important, especially when the distance from nearest bus stop is used as a factor to suggest whether or not it is within a viable walking distance. Focussed appraisals should use consistent measurement data, which is not the case here.

Area 4 is stated as being further from the town centre than other sites, which despite suggesting extensions to bus services, means the main travel mode will be car based, which goes against the sustainable credentials for this location.

Transport

*It is concluded that '*main pressure will be exerted on A448, Slideshow Roundabout and A38 to M42 J1' *– thus proving the majority of traffic will head away from Redditch, negating the strategy to re-vitalise Redditch Town Centre.*

*It then proceeds to say that '*the likely benefits of development here is that it is more likely to assist in the regeneration of both Bromsgrove and Redditch town centres than other locations'. *This is in complete contradiction to your previous statement.*

Green Belt Gap

It is suggested that Cur Lane will be an ideal boundary to check urban sprawl, yet in the focussed appraisal for Area 8 (Bordesley), the use of Storrage Lane as a boundary is frowned upon – why the differing opinions when both should be equally judged for this purpose ?

Highways

It is suggested that development in area 4 is likely 'to exert main pressure on the Slideslow roundabout and the A38 running to J1 of the M42, which will require further study'.

The same section then goes on to suggest that 'benefits of development in area 4 will be more likely to assist in the regeneration of both Bromsgrove and Redditch Town Centres, than other areas, which may encourage commuting further afield to Birmingham'.

If this is in fact the case, then why does the 'Travel Destinations from Development Areas' map show <u>significant</u> traffic flow to destinations including Solihull, Birmingham Centre / Selly Oak / University, Longbridge, Birmingham Centre / Kings Heath, Alcester / Evesham, Stratford / Warwick and Henley in Arden ? According to the legend on this map, nearly half (approx.46%) of the travel destinations are outside of Redditch and Bromsgrove, which does not support the theory above used to justify development in area 4.

It is suggested that it would be possible to simply extend Public Transport services in this area, rather than providing a new bespoke service, as would be required 'elsewhere'. This is not correct. Services in the area have already been cut, and an existing planning application from Taylor Wimpey for the adjacent Webheath ADR development has been forced by WCC to include a business plan (initially funded by the developer)for providing a sustainable bus service as existing remaining services are not good enough. How can you rely on the extension of a bus service which is not only yet to be implemented, but which also forms part of a planning application which is not yet even approved, and suggest that this merits evidence for acceptance of this particular site over others ? It clearly does not.

Proposed boundaries

The proposed boundaries for this site are, by your evidence documents own admission, 'not strong and complete' *and will require strengthening, yet the site is still supported for development, whereas other sites within the documentation are criticised for their poor defensible boundaries, and later discounted. This does not demonstrate a balanced approach to the assessment of each area.*

Conclusion

*The conclusion states that the proposed development area '*uses strong and defensible boundaries'*, yet the previous section highlighted weaknesses with the boundaries on this area. This is a clear inconsistency in the assessment. It also states that the area* 'does not merge with Banks Green or Tardebigge' *yet fails to mention the complete swallowing up of Foxlydiate which will occur, as well as the fact that Tardebigge will actually be on the verge of coalescence.*

It also confirms that residents within the area would be car-dependant, and thus unsustainable transport would result. Substantial Public Transport improvements would be required, along with other key infrastructure improvements, including sewerage. However, these major shortcomings in the site are seemingly brushed over – the extensive negative aspects in the documents conclusion are simply forgotten by the last paragraph.

Area 8 (Bordesley Park) Focussed Appraisal

Green Infrastructure

The document suggests that the scrap yard at the junction of Dagnell End Road and Icknield Street may present an added constraint to this site for development, due to an advisory 250m exclusion zone around such facilities. This is understood, but in a similar vein, the Webheath ADR land (LP4) includes an area of disused sewage works – yet this is not seen as any form of constraint or as requiring any form of exclusion zone. Why is there no consistency between the focussed appraisal assessments on issues such as this?

The document states there are 2 SWS's located adjacent to the northern boundary of this area. Although it is realistic to mention these, they are not inside the area, and should not be seen as constraints to development. In addition, development proposals for this area, which Officers are fully aware of, do not encroach on the adjacent part of the site to these.

Accessibility

Several existing bus services are mentioned, but it is suggested that as the centre of the site is 1.7km from any of the existing bus stops, this would be considered beyond reasonable distance. However, surely this is not an argument against development, as development on

any such scale as would be envisaged, would include bus stops at numerous points throughout the new site as part of WCC requirements for sustainable transport. (By comparison, in the focussed appraisal for Area 4, it is considered satisfactory that there are bus stops within 1km of the site – in actual fact, the nearest stop is 1.4km from the centre of the site, if using similar measuring criteria to that for Area 8, and around 1.8km from the most distant part of the site (using 'as the crow flies' figures). Once again, inconsistencies in the focussed appraisals between areas are significant.

It states that the area is 4.3km to Redditch Train Station – when measured on a map, using footpaths alongside roads, the distance is actually 3.7km.

The document says the central point on the site is 5.1km to Redditch Town Centre, but again, using footpaths for the route, it is actually 4.1km. The misrepresentation of distances, whether intentional or not, demonstrates poor attention to detail, and in some instances, has the impact to alter the conclusions relating to certain judgements within the appraisal.

Vitality and Viability

The last paragraph of this section insinuates that residents may use Alvechurch facilities instead of Redditch as Alvechurch offers closer services. This is an example of how incorrect distances in the accessibility section result in false judgements elsewhere. Alvechurch is stated as being 4.04km, which against the documented figure of 5.1km to Redditch, could suggest it supports the concept for using Alvechurch services. However, when the real distance figure for Redditch Town Centre of 4.1km is used, the argument is much weaker. And of course in practise, is it realistic to assume someone would go to shop at Alvechurch, where there are very limited facilities/services, when the Kingfisher Centre with its huge array of shops and services, is virtually on the doorstep, and a superstore exists just down the road ?

Flood Risk

'Land drainage due to heavy clay and surface water discharge are the main concerns in this catchment' *is detailed from the SFRA Level 1 Assessment. This is probably better than for Foxlydiate (area 4)/Webheath ADR (LP4), where water discharge is not considered an issue, despite records that do show some existing flooding has taken place in that area before. Once again, inconsistent 'measuring' methodology is being used between sites.*

Infrastructure Capacity

The document clearly states that this area is located closest to the trunk sewer network compared to all the other areas. It will require much less upgrading / improvement than that for Area 4, which in addition may require unsustainable pumping to provide a solution in certain areas.

Transport

*The document states that '*Development would very likely encourage commuting northwards to Birmingham where the economic benefits would manifest. It is therefore less likely to assist in the regeneration of either Redditch or Bromsgrove Town Centres'. *This is a completely misleading statement. The growth plans own Travel Destination from Development Areas map highlights that around 46% of traffic will be destined for locations other than Redditch/Bromsgrove, in fact around 32% of the traffic is expected to travel to Birmingham based locations anyway, wherever the final development sites are located. The statement here for area 8 clearly does not take account of the Travel Destination study, and is being used to prejudice the reasoning behind the discounting of area 8 for development.*

What the document does not mention is the fact that the location of area 8 makes it ideal for linking to the M42, without creating major traffic issues elsewhere, as will occur with other sites, especially area 4, where the traffic will need to travel via Bromsgrove Slideslow roundabout up to the M42.

It suggests that the poor Public Transport provision would need a bespoke new system, but in reality, this is also the case for other areas when development on such a scale takes place. There is no less support than there is for say area 4, but suddenly the provision will prove costly to implement. More inconsistencies between site appraisals.

*The '*significant investment in walk and cycle infrastructure' *is simply no different to that which would be required for Area 4 or any other sites for that matter. For some reason though, the potential high cost of this is mentioned for this site, but not for others.*

Green Belt Gap

*The document says that '*there is no logical extension to the urban form of Redditch in this location' – *which is an argument which could equally apply to the other areas examined, as they all eat in to green belt, and create odd extensions to the form of Redditch. It is not a unique argument to Area 8.*

There are other areas within the town where parks / golf courses etc. create breaks in the urban form, and development on area 8 would simply be another example of this. The Arrow Valley virtually splits Redditch in two, and so this is clearly not an argument against development in any specific area. In addition, careful design and planning will act to ensure this does not occur.

Green Belt Encroachment

The document suggests that the feeling of remoteness for the site would be increased because the area cannot be seen from Redditch urban area due to higher areas in foreground. Where exactly are these higher areas ? Any undulation in the site would likely be levelled to some extent by the developer which would mitigate this kind of problem, if it in

fact exists. The land rises to the North, so suggesting it would not be visible from other Redditch urban areas is a mystery.

*It is stated that '*a distinct lack of strong defensible boundaries in the area makes it difficult to determine where any development would start to encroach in to the countryside, unless weak boundaries were strengthened considerably'*. This is no different to Area 4, which also has weak boundaries, but the wording of the respective paragraph in area 4's focussed appraisal does not suggest that this is a problem – why should it therefore be expressed as a concern for this site ? Indeed, many of the boundaries for Area 8 are actually stronger than those for Area 4.*

Built Environment

Much is made in this section regarding the various HECZ sites located around the area, although the majority of any development proposed by the developer with options on this land does not spread in to these areas. Their master plan has been provided to Officers, yet seemingly its content is ignored when considering this site.

The majority of the sites examined will result in an impact on the views to and from them, but there are no comments to this effect for example in area 4 appraisal, despite the fact that it also contains several areas of historical importance. It is unfair therefore to suggest that any resulting impact on views to or from Rowney Green is of more importance than to or from other areas included in the appraisals. The higher setting of Rowney Green would mean that any views from there were looking over and across area 8 – rather than at it. Many areas around Redditch look across or over the built environment, so this is no different.

It is perfectly reasonable for a park or golf course to be surrounded by built up areas – Arrow Valley Park and Pitcher Oak Golf Course are examples within Redditch, so the suggestion that development in area 8 would not connect well with the existing urban form of Redditch should not be considered an obstacle to its development. In fact surely it is better to incorporate such elements as breaks within the urban form, in order to create a more open feel to the town, and enhance the feeling of open space.

Highways

As discussed previously, to suggest that development in area 8 would encourage commuting northwards to Birmingham is not a sound argument against development, as the travel destination analysis demonstrates that considerable traffic would be journeying there anyway. Residents will travel to their place of employment wherever that may be – there is nothing to suggest that any housing on such developments will only be for locally employed people – to assume this would be a very unsound concept to base proposals on.

It is also unfair to suggest that economic benefits will manifest in Birmingham rather than Redditch or Bromsgrove because it is highly unlikely that shoppers will travel all the way in to Birmingham when the Kingfisher Shopping Centre and other such facilities are literally just down the road from the site, and represent a far more sustainable and viable option.

Once again, it is suggested that provision of Public Transport services for this location would require a new bespoke service, and prove very costly. If this is compared against Webheath ADR (part of the overall growth proposal), where the existing developer-in-waiting has had to provide a full detailed business plan for new bus services to support it (including initial funding), despite the existing (and supposedly well served by Public Transport) settlement of Webheath right on its doorstep, then it does not make sense.

Inconsistent comparisons and judgements once again arise. In reality, the implications on providing a suitable Public Transport system for Area 8 are no different to that for other sites. In fact its proximity to the local train services is indeed better than other sites considered, a factor which will be enhanced with potential improvements to the local rail network and stations.

Proposed Boundary

It is stated that 'the boundaries identified within Area 8 are not, in green belt terms, particularly strong to defend', *yet a master plan provided to Officers by the potential developer for this site has clear boundaries which would protect the green belt and ensure there was no coalescence with other settlements.*

The statement that 'Therefore in Green Belt terms no development would be preferable for this area; however for consistency further work has been done on selecting the most appropriate boundaries that could be utilised' *gives the impression that this factor alone has been used to make a decision against development on area 8, and that the further comments made in the document on the site are merely for the appearances sake.*

No area should be discounted on one factor alone, especially when it is a factor which is poorly matched against other sites being considered. For example the Green Belt boundaries for Area 4 are considered weak in its focussed appraisal, yet there is no such statement on a preference for no development there – the document moves on to propose boundaries and even though some of these are still weak, it is accepted that this is a necessary part of the process.

It is unfair for the statement above relating to further work being done for 'consistency' to be included, as it auto-suggests a prejudice towards non-development of area 8, based on an isolated consideration.

Conclusion

The sustainability of area 8 for development is in reality no different to that for other areas being considered, indeed it is potentially more sustainable for some of the travel aspects than other sites, due to its proximity to Redditch Town Centre and other nearby facilities such as the Abbey Stadium.

*The loss of green belt is true for every site assessed, as is the potential that revised green belt boundaries will in some instance be weak and require careful planning and design to be strengthened accordingly. The conclusion for area 8 states that development here would '*have serious impact on the green belt which could lead to sprawl, encroachment and coalescence with other settlements', *yet with the properly designed boundaries and protection, this would not be the case.*

Storrage Lane would clearly defend the northern boundary of the site if required, at which point the development would be no closer to Rowney Green, than the limits of the proposed development on area 4 are to Tardebigge. Why then is it deemed in the conclusion that area 8 may represent coalescence, whereas area 4 conclusion specifically states that there would be no such effect on Tardebigge ? Inequalities in the measuring criteria are being used which result in judgements being swayed one way or the other for different sites, for critical decision making aspects of a sites consideration – this repeated issue represents a major flaw in the Growth Plan evidence documents.

*The '*severing*' of the '*green corridor that runs along the Arrow Valley in to the countryside beyond' *that is suggested*, *need not occur if development within area 8 was carefully planned. Indeed this 'corridor' is already partly broken by the Abbey Park development. The 'green corridor' therefore runs to the East of this, a pattern which could be maintained if development in area 8 took place on the West side of the North-South brook on the site. Such a concept has been proposed by developers for area 8, but this has for some reason not been recognised as an option when assessing this site.*

Area 11 (Bordesley West) Focussed Appraisal

Accessibility

This site is located very close to Redditch Town Centre and all its services, yet still the distances stated are questionable. To suggest that 'development in this location would encourage travel by car more than some of the other areas being appraised' *may be a true statement in one way, but in reality, there are other sites such as Area 4, which would actually necessitate car travel more than this site - the wording used here for Area 11 infers it may be the worst location, whereas it is not. The Town Centre is easily reached on foot.*

In addition, not enough is made about the location of the site in relation to the Abbey Stadium – where it says it is 1.4km away. In actual fact, parts of Area 11 are only a few tens of metres away from the Abbey Stadium, and thus also closer to the Town Centre services and facilities than the text intimates.

Vitality and Viability

*The document states that '*it should be noted that the closest facilities are within Bromsgrove District and this may work against the primary objective of providing housing for Redditch's needs as residents may choose to use Bromsgrove District for services'. *Is it really considered that residents would travel to the limited shops and services in Alvechurch, when a Sainsburys superstore, The Kingfisher Centre and other facilities are literally down the road from this site?*

Green Belt

Concerns of coalescence are raised where the area runs north towards Alvechurch and the ribbon development of Bordesley along the A441.Once again, the issue of coalescence is raised, yet the distances between the northern most tip of the area is significantly further away from Alvechurch than the tip of Area 4 is to Tardebigge, where coalescence was not considered a problem. In any case, it is likely that a Bordesley bypass could act as a strong boundary to the North, which would place the edge of the site well away from Alvechurch.

*In addition, to suggest that the '*ribbon development of Bordesley along the A441' *is relevant to coalescence is hypocritical beyond belief;*

The proposals for the Redditch Growth Plan include the Webheath ADR. Running along the southern boundary of the ADR is the 'ribbon development' of Crumpfields Lane – similar in form to that of the Bordesley ribbon, but only a small lane, rather than a main road – a single ribbon of individual designed houses extending from Webheath. Yet there is no concern that this will become coalesced with the new ADR development, despite the fact this is one of the last semi-rural lanes of its kind in the area. Also, the south eastern side of the proposed area 4 is bounded by Foxlydiate Lane – yet once again, there is no mention or concern that the 'settlement' of Foxlydiate will be completely engulfed by development in area 4 – coalescence on a monumental scale.

Equal consideration should be given to all sites where similar features or existing layouts will be affected – the Growth Plan documentation does not accord this consistently.

Highways

The same poor judgements are used relating to the encouragement of travel to Birmingham as for Area 11. As with Area 11, residents will travel to their place of work, wherever that it. It is incredibly naïve to expect all residents to be employed within Redditch, as borne out by the Travel Destination analysis that forms part of the Growth Plan documentation. It is

however more than reasonable to consider that residents living just down the road from Redditch Town Centre will choose to shop and use facilities there, rather than travel 15 miles in to Birmingham. If the Borough or County Council consider that they would be unable to 'encourage' residents to utilise the Redditch facilities in these such conditions, then their claims for other sites regarding the potential for residents improving the vitality and viability of Redditch or Bromsgrove Centres is indeed questionable.

There is no mention for sites 8 or 11 of the potential for the Bordesley bypass to be built if development in one or both of these areas was to take place.

Example proposals submitted to Officers for development at Bordesley – on sites 8 and 11, include the construction of a bypass at the developers cost, which would provide significant improvement to the highway network in this area, including a marked improvement in conditions for the residents at Bordesley, who already incur problems with the A441 traffic flows.

In fact, examining the Travel Destination analysis, development at any of the other proposed sites would only add to the traffic flows on the A441 (approx. 7% of destinations from new development would be to Longbridge, 8% to Birmingham City Centre/Selly Oak/University – all of which would be likely to utilise the A441), so the ability to have this part of the highway network upgraded/improved at no cost to the tax payer should on its own merits be a prime factor for supporting development in Areas 8 and 11.

Conclusion

It is detailed that Area 11 could be utilised for development, if Area 6 was also brought forward. As Area 6 has been proposed for growth, it is difficult to understand why Area 11 has not, especially when developer –provided proposals demonstrate a viable option for both housing and employment within the constraints of this site. The opportunity to gain both some housing, along with potential local employment based development that would improve the sustainability credentials for this site is surely worthy of consideration.

The revised proposals map in Appendix B illustrates how a smaller area of Area 11 could be practically utilised, including a route for the Bordesley Bypass. The new bypass could aslo act to create a strong Northern boundary to the site.

REVIEW OF HOUSING GROWTH SUSTAINABILITY APPRAISAL (SA)

Area 3

Although the Webheath ADR was included in Local Plan 3 for reserve land for housing beyond 2011, this is not sufficient reasoning to investigate or assess this site further. Local Plan 3 was produced and 'tested' many years ago, and many associated factors and criteria relating particularly to the sustainability of development sites will have changed during this period.

A premature planning application for the ADR has highlighted many issues associated with transport and the local highways network, as well as the necessity for the potential developer to have to provide a business plan for a new bus service to the area due to its poor existing connectivity. Given the 'loading' applied to accessibility and reducing the need to travel within the sustainability appraisal, it seems poor judgement to make the assumption that the ADR will meet the new sustainability criteria without further assessment within the study.

In fact the rest of the Area 3 assessment states that 'it is not considered that development on this area will encourage a modal shift away from car based travel. There are no bus services available within a reasonable walking distance meaning that there would be a major reliance on private transport to access the Town Centre and employment opportunities'. *Given that approximately half of Area 3 comprises of the existing Webheath ADR, surely the same judgement will apply to the ADR as to the remainder of Area 3, rendering it unsustainable in terms of the key scoring element of the SA criteria.*

The score against SA objective S5 should therefore be -2, not the -1 suggested. SA objective E9 should also be negative (currently 0) as the encouragement towards car based travel inferred clearly detracts from the reduction of causes of climate change.

In addition, SA objective E8 is not scored, as the commentary suggests further studies would be required to assess its impact against the objective. However, there are already known issues relating to the sustainability of potential sewage pumping which will be required from the Webheath ADR site. There is also a known disused sewage treatment plant within Area 3, which may harbour potential hazards requiring further mitigation. As both these factors are public domain knowledge, it is not acceptable to comment simply that related issues would need to be investigated further at planning application stage. The known factors could be scored, and they would undoubtedly result in at best a -1, in place of the current ?

The Webheath ADR should therefore <u>not be automatically included</u> as a development option, given its lack of up to date analysis against SA objectives and other criteria.

Area 4

One of the key strengths listed for Area 4 is the fact that 'the Eastern part of the area is within 4km of Redditch Train Station, and thus performs strongly in objectives such as improving the vitality and viability of centres, equitable access to services and moving towards more sustainable travel patterns'. *Whilst the Eastern most corner of the area may be deemed as within 4km, the Western most corner (of the 'reduced capacity area 4) is actually more than 6km from Redditch Train Station. Therefore one of the key strengths used to promote this area is actually flawed straight away, and the sustainability of the site questionable.*

A key weakness is suggested as the reduction in gap between the potential extended area of Redditch and the settlement of Finstall – however, no mention is made of the even more drastic reduction on gap between this site and the settlement of Tardebigge, or in fact Foxlydiate, which is swallowed up entirely by Area 4.

Reduced Capacity Area 4

Key strengths for the reduced capacity Area 4 still include its proximity (now oddly 3.5km) to Redditch Train Station. As detailed regarding Area 4, the North West area of the site is indeed over 6km from the Train Station, so again, does not perform strongly in this aspect.

The distance from the train station for full area 4 was stated as being 4km – however, as stated, much of the (reduced) area is in fact further than this away(the Town Centre and Train Station are within 50m of each other), so the positive scoring against SA objective S3 given on the basis of its 'within 4km' distance of the Town Centre should be adjusted to a zero figure at most, rather than its current +1 value.

In a similar vein, the +2 score for SA objective S5 is of concern. When Area 4 was considered as a whole, its Eastern side was considered 4km from Redditch town Centre and Train Station, and likely to encourage cars as a transport medium, but for some reason this reduces to 3.5km for the reduced area – despite the fact that the Western side of the reduced site is actually still over 6km from these facilities – and suddenly this then is deemed likely to promote sustainable travel patterns. This is a very dubious conclusion to draw, using distances which are flawed in reality, and as such the score for S5 should be reduced to 0.

Environmental objective E1 scores -1, although the two SWS's on site are not mentioned in the commentary. In contrast, Area 8 matrix commentary includes wording relating to the negative effect that development on that site would have on its single SWS, and scores it -2 accordingly. The E1 score for Reduced Area 4 should therefore be adjusted to -2, or the Area 8 score adjusted to -1 to match the similar status of Reduced Area 4.

Objective E9 is marked +1, related to reducing causes of and adapting to the impact of climate change. Given the comments above, and the misleading distances used for proximity to relevant facilities, the potential that the site will not encourage more sustainable travel patterns should adjust this score to 0, or even -1 on the basis it may even increase the potential of car usage. This would tie in with the scoring for area 3, which is partly adjacent to area 4, and scores 0 on this point.

Objective EC3 is scored +1, directly in lieu of the sites 'close' proximity to NEW College, which it determines as 3.5km. As NEW College lies further from the site than both the Town Centre and Railway Station, this is another flawed argument. The South Eastern corner of the area may be within this specification, but the majority of the site is between 4km and 6km away from the College, clearly negating the positive scoring for this objective. In addition, a neutral score was determined for the full area 4 site in its matrix, due to the lack of employment in the area, a factor which is just as relevant for the reduced area 4.The score for EC3 should be adjusted accordingly to 0.

Area 6

Realistic key strengths are highlighted in terms of the proximity of this site to Redditch Train Station and other local facilities, clearly meeting the SA objectives for encouraging sustainable travel, despite the fact that the focussed assessment of this area in the Housing Growth Background document decides that its proximity to services would not achieve this.

The SA objective S5 in fact contradicts the focussed appraisal for this area, by scoring +1 for the positive impacts this area promoted for sustainable travel, thus highlighting inconsistencies in the analysis of the study.

Area 8

A key strength is determined as the areas proximity to facilities which promote health and well-being, as well as the proximity of sustainable transport (i.e. bus stops/rail station) being likely to promote the use of these services, and thus meeting the key SA objective.

A key weakness is outlined as being a lack of facilities nearby, although this is the case for many of the sites assessed, and the fact that any development will be likely to include a school as well as other local facilities provides an obvious mitigation against this.

Objective S3 for improving the viability and vitality of Town Centres etc., is strangely scored -1 for Area 8. In comparison, Reduced Area 4 scored +1 for this objective, despite being further from Town Centre facilities than parts of Area 8. Although there is a school slightly closer to Reduced Area 4 than there is to Area 8, this school is already over-

subscribed, and in any case any of the proposed growth sites are anticipated to incorporate a new First School, which mitigates against this. As the negative score for Area 8 relates to distance to educational establishments, in light of the above, and its closer proximity to Town Centre facilities, this score should be adjusted accordingly to 0.

Environmental objective E1 is scored as -2, with inference that development on this site could be adversely affected because of the SWS on site. However, Reduced Area 4 has two SWS's on site, yet these are not referred to in its commentary against this objective, and it only scores -1, despite the presence of two SWS's. This represents clear inequality in the scoring methodology, and as such, Area 8 and Reduced Area 4 should at the very least be scored identically, be that -2 or -1.

Objective E2 scores -2, with commentary indicating loss of green belt, potential for coalescence with Bordesley and reducing gap between Redditch and Birmingham as the reasoning behind this. In the case of Reduced Area 4, a score of only -1 is given, despite the fact that development of this site would completely engulf Foxlydiate, and encourage coalescence with Tardebigge. As such, both sites have similar detrimental results for this objective, and as such should be scored the same, by either adjusting Reduced Area 4 to -2 or Area 8 to -1.

Area 8 has a -2 score for SA objective E3, because, it suggests that if developed, the area will not form a logical extension to the existing settlement but will also potentially block/end the green corridor of the River Arrow valley. With cross boundary development, the potential for 'logical' extensions to Redditch settlement will always be questionable, but this is no more the case for Area 8 than any of the other potential sites being considered. It would be easy to mitigate the possible blocking of the River Arrow valley by careful design and boundary selection. The part of the site to the East of the North-South brook across Area 8 could be removed from Area 8 to prevent the blocking of the valley. In fact, developer proposals for this area to the West do not go across the brook, which represents a reasonable boundary for such development. A reduced Area 8 could also have been proposed to mitigate this concern if Officers chose to do so. It is therefore considered that the score against E3 should be adjusted to -1 instead of the current -2.

Reduced Capacity Area 11

*It is considered that the reduced area 11 '*has good public transport links, which with appropriate improvements facilitated by development could provide a realistic alternative to the car'. *Surely another high score for a key element for meeting the SA objectives.t also promotes the closeness of the area to sports facilities to encourage healthy lifestyles.*

It is surprising therefore that in the key weakness section, it is considered that those without a car may suffer social exclusion. This statement is in direct contradiction to the one made

above for the site – the availability of good public transport services would surely mitigate the potential social exclusion for non-car users. This sort of contradiction makes it difficult to assess how realistic the area is being judged on a key SA objective.

Potential coalescence with Bordesley is no different to the coalescence of areas such as Foxlydiate within Area 4 – which is not actually seen as a weakness within the assessment of Area 4, so for consistency between sites, any coalescence should be judged in the same manner – which is not the case here.

SA Objective E2 scores -2 due to potential coalescence with Bordesley, and reduction of strategic gaps between Redditch/Alvechurch/Bromsgrove/Birmingham. As with previous scores, the consistency between area scoring is poor. Reduced Area 4 scores only -1 for E2, despite the fact it would envelop Foxlydiate completely, and reduce the strategic gap to Bromsgrove much more than the Reduced Area 11 does, as well as promoting coalescence with Tardebigge. It seems the -2 score here for Reduced Area 11, is in fact more relevant for the entire Area 11, so perhaps this is a simple error, but in any case, the E2 score for Reduced Area 11 should be adjusted in line with other similar comparisons, such as Reduced Area 4, where a -1 score is appropriate.

Note that the score for E1 objective is recorded as a single minus, but in the results table, it is scored as -2; the red shaded entry on the corrected table below includes the correct figure of -1.

The score for E3 SA objective is marked -2, despite the fact that the Reduced Area 11 does not infer coalescence with Rowney Green, or indeed Alvechurch, which would remain well separated. In addition, developer proposals for this area are very selective in that they remain contained to the West of the River Arrow, and do not extend Northwards beyond the existing ribbon development at Bordesley. If Officers recognised this area as a potential site, against the master plans that the developer submitted, then objective E3 could be easily scored as a -1 worst case, to zero, best case.

The table below contains the original scores from the Housing Growth Sustainability Appraisal, together with the corrected scores for the relevant areas discussed in the text above. The corrections are highlighted, and as can be seen, the resultant final scores differ considerably.

Assessment of Areas against SA Objectives

	Area 3 Original	Area 3 Corrected	Area 4 Original	Area 4 Corrected	Area 11R Original	Area 11R Corrected	Area 8 Original	Area 8 Corrected
Sustainability Objectives								
S1	2	2	2	2	2	2	2	2
S2	1	1	1	1	1	1	1	1
S3	1	1	1	0	1	1	-1	0
S4	1	1	1	1	1	1	1	1
S5	-1	-2	2	0	1	1	1	1
S6	0	0	0	0	0	0	0	0
Sub Total	**4**	**3**	**7**	**4**	**6**	**6**	**4**	**5**
E1	-1	-1	-1	-2	-2	-1	-2	-1
E2	-1	-1	-1	-1	-2	-1	-2	-1
E3	-1	-1	-1	-1	-2	-1	-2	-1
E4	-1	-1	0	0	0	0	-1	-1
E5	1	1	1	1	1	1	1	1
E6	-1	-1	-1	-1	-2	-2	-2	-2
E7	1	1	1	1	1	1	1	1
E8	0	-1	0	0	0	0	0	0
E9	0	0	1	0	0	0	1	1
Sub Total	**-3**	**-4**	**-1**	**-3**	**-6**	**-3**	**-6**	**-3**
EC1	0	0	0	0	1	1	1	1
EC2	0	0	0	0	1	1	1	1
EC3	0	0	1	0	2	2	2	2
Sub Total	**0**	**0**	**1**	**0**	**4**	**4**	**4**	**4**
Grand Total	**1**	**-1**	**7**	**1**	**4**	**7**	**2**	**6**

Based on the methodology used of discounting sites that have negative, or neutral effect in sustainability terms, this means that Area 3, which was originally deemed to have a slightly positive effect, now has a negative effect, and should be discounted from further consideration. As The Webheath ADR forms effectively the Northern part of Area 3, this highlights the concerns raised in the Housing Growth Background document relating to the fact that the Webheath ADR section of Area 3 needed no further analysis as it had been examined in detail during the creation of Local Plan 3. As detailed earlier in this document, appraisal factors will have changed significantly since the Local Plan 3, and to automatically accept this area as suitable and sustainable for development represents a gross flaw in the process.

The Webheath ADR should therefore be removed from automatic qualification for development in Local Plan 4 without a new full and detailed appraisal, in line with all other areas assessed.

Another resultant change from the corrected SA Objective scoring, is that Areas 8 and 11 both score very well in terms of sustainability, overtaking Area 4 considerably in this vein.

If this is combined with the fact that there has been an initial developer submitted master plan for Areas 8 and 11, which includes a bypass, school and other local facilities, then the viability of these areas to support large scale sustainable development within these locations is further proven.

With careful planning there is no doubt that by using a combination of the other most positive scoring areas, it will be feasible to meet the required housing figures.

On this basis, a sustainability appraisal for the combination of the 3 most sustainable sites - Areas 6, 8 and reduced area 11 should be carried out. To provide an illustration of this, the existing appraisal for Areas 6 and 8 combined will be revisited, taking in to account the corrected scoring factors in the table above, as well as the impact of Area 11.

Assessment of New Scenario against SA objectives

	Area 6	Area 11R Corrected	Area 8 Corrected	Areas 6,8,11R Combined
Sustainability Objectives				
S1	2	2	2	2.00
S2	1	1	1	1.00
S3	1	1	0	0.67
S4	1	1	1	1.00
S5	1	1	1	1.00
S6	0	0	0	0.00
Sub Total	**6**	**6**	**5**	**5.67**
E1	-1	-1	-1	-1.00
E2	-1	-1	-1	-1.00
E3	-1	-1	-1	-1.00
E4	0	0	-1	-0.33
E5	1	1	1	1.00
E6	-1	-2	-2	-1.67
E7	1	1	1	1.00
E8	0	0	0	0.00
E9	1	0	1	0.67
Sub Total	**-1**	**-3**	**-3**	**-2.33**
EC1	1	1	1	1.00
EC2	1	1	1	1.00
EC3	2	2	2	2.00
Sub Total	**4**	**4**	**4**	**4.00**
Grand Total	**9**	**7**	**6**	**7.33**

Previous combined scenario assessment scores:

Areas 4 & 5 =**2**

Areas 4R, 5, 6 & 11R = **4.5**

Areas 4 & 6 = **6**

Areas 6 & 8 = **5.5**

Conclusions

As can be seen above, the combination of Areas 6, 8, and 11(reduced) performed the highest out of all the combined sites assessed, by a clear margin.

*Although the Housing Growth Sustainability Appraisal conclusion suggests there are '*strong planning grounds why the combination of Area 4 and 6 is preferable'*, there is no indication of exactly what these grounds are, or why they offer any preference. The statement is therefore being made without evidence, and should not therefore be included within the document.*

*The conclusion also states that Area 8 is considered to be '*open*', such that development here '*could be harmful to the wider landscape'. *Surely this aspect of the site, if relevant, should have been included in the various assessments and appraisals, and scored accordingly. The word '*could*' also implies that careful design would be able to mitigate against such considerations.*

In addition, a consideration not factored in to the sustainability assessment is that of the ability for the land to be bought forward for development within the proposed plan period.

The Housing Growth Background document clearly states that southern parts of Area 4 are in 'mixed' ownership, with only part of the area being owned by house builders. Within other RBC documentation is was confirmed that not all of the questionnaires sent out to land owners for Area 4 as part of this process were in fact returned; further questioning the viability of the complete area to be bought forward for development purposes.

*In contrast, Areas 8 and 11 both have developer interest, and indeed a sample master plan has been supplied which illustrates a suggested layout for the sites, and includes developer commitment to build a bypass at Bordesley – a commitment which has been completely ignored throughout the Housing Growth documentation. The document in actual fact states that '*it is unlikely that sufficient funding can be identified for this Bypass to be delivered'. *This demonstrates that potential evidence to support a site, with large scale development opportunities, has been completely ignored by Officers during the process.*

*The same document also infers that parts of Area 11 that have existing employment use, discounts that area from the necessity to be included, as it would require '*robust justification'. *As with many other statements, this seems to indicate an air of automatic disqualification, despite the fact that this aspect of the site produces positive scores on all 3 of the Economic SA Objectives.*

Based on the above, the sites proposed for Redditch Housing Growth to 2030 should be Areas 6, 8 and 11 and this should be reflected in Local Plan No.4

The Webheath ADR forms effectively the Northern part of Area 3. The housing Growth Background document suggested that the Webheath ADR section of Area 3 needed no

further analysis as it had been examined in detail during the creation of Local Plan 3. As detailed earlier in this document, appraisal factors have changed significantly since the development of Local Plan 3 many years ago, and to automatically accept this area as suitable and sustainable for development represents a gross injustice in the process.

The Webheath ADR should therefore be removed from automatic qualification for development in Local Plan 4 without a new full and detailed appraisal, in line with all other areas assessed.

Given the highlighted issues with the two key documents in this review, it is clear that Local Plan 4, which relies on the resultant decisions from them, has been produced using poor or inaccurate evidence, and as such is seriously flawed.

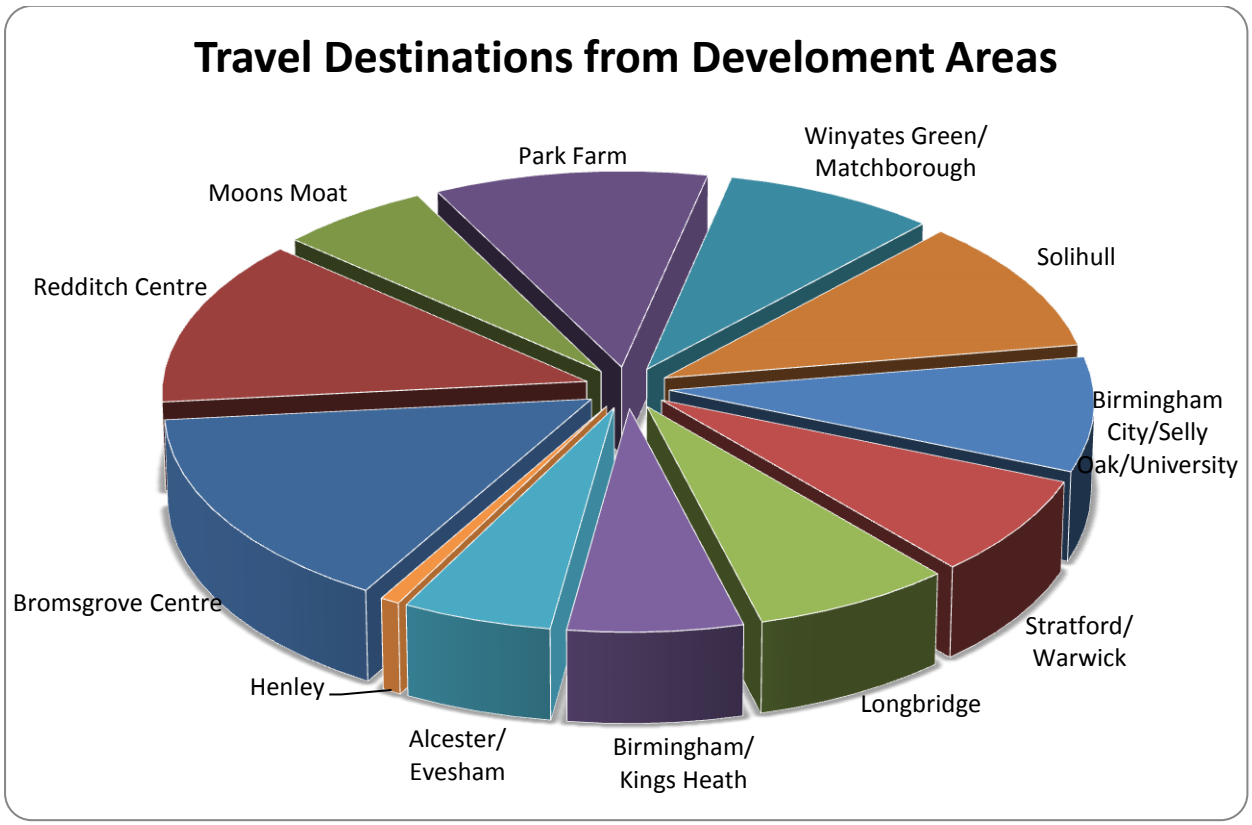
The proposed Local Plan 4 should also therefore be withdrawn and revised, to reflect new evidence available for the sites discussed.

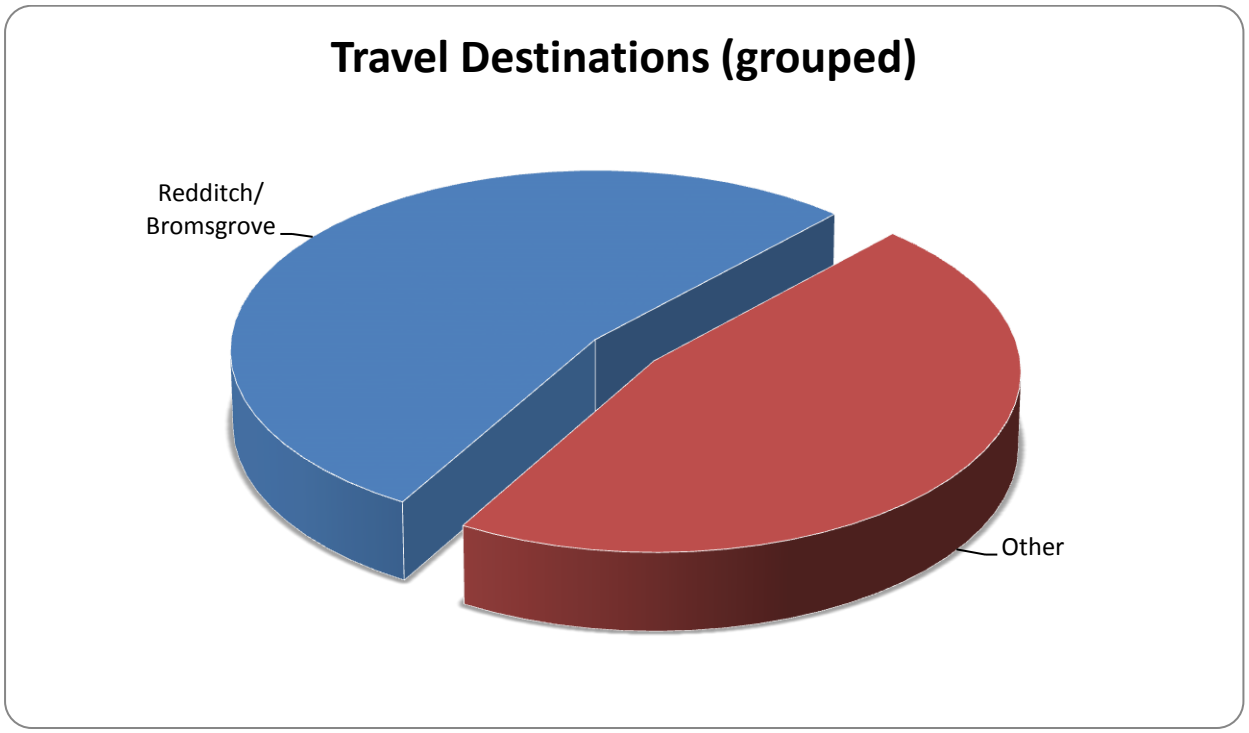
A.J.Warby

13 May 2013

Appendix A – Travel Destination Data

This data is extracted from the 'Travel Destinations from Development Areas' map forming part of the evidence base for the Housing Growth Plan / Local Plan 4

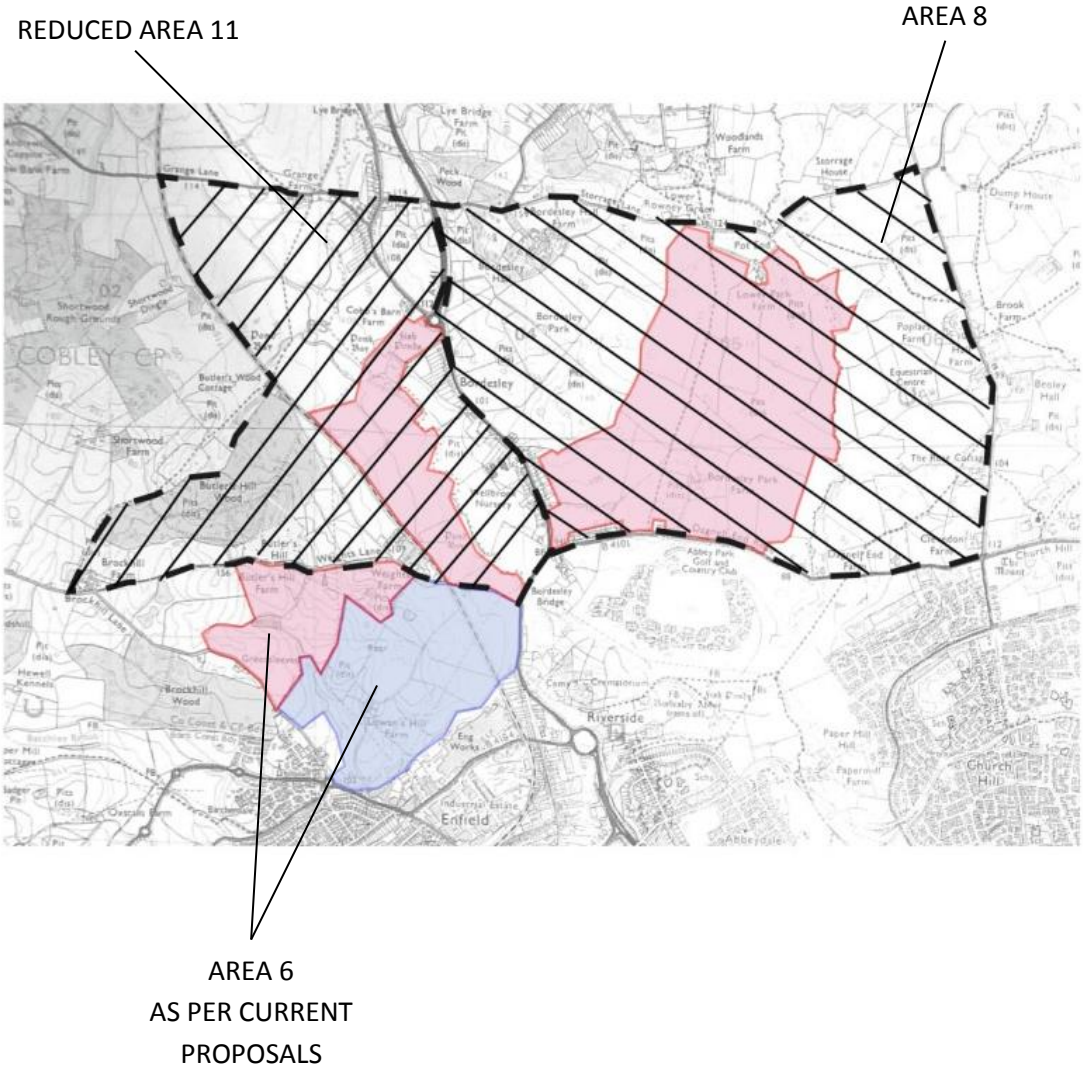




Appendix B – Revised Proposals Maps

The diagonal black shading on the first map below illustrates the location of the Reduced Area 11 and Area 8 as originally appraised.

The pink shaded areas represent potential areas within these locations for a level of development which would be sustainable and viable, as alternatives to the flawed Area 4.



This second map shows the impact of the revised sites on the urban form of Redditch.

Note that the Arrow Valley is not blocked or closed off in any way.