



BROMSGROVE DISTRICT COUNCIL

CABINET

WEDNESDAY, 3RD DECEMBER 2008, AT 3.00 P.M.

COMMITTEE ROOM, THE COUNCIL HOUSE, BURCOT LANE, BROMSGROVE

AGENDA

MEMBERS: Councillors R. Hollingworth (Leader), Mrs. J. M. L. A. Griffiths (Deputy Leader), Dr. D. W. P. Booth JP, G. N. Denaro, Mrs. J. Dyer M.B.E., Mrs. M. A. Sherrey JP, R. D. Smith and M. J. A. Webb and P. J. Whittaker

1. To receive apologies for absence
2. Declarations of Interest
3. To confirm the accuracy of the minutes of the meeting of the Cabinet held on 5th November 2008 (Pages 1 - 6)
4. Minutes of the meeting of the Overview Board held on 4th November 2008 (Pages 7 - 10)
 - (a) To receive and note the minutes
 - (b) To consider any recommendations contained within the minutes
5. Minutes of the meeting of the Performance Management Board held on 18th November 2008 (Pages 11 - 14)
 - (a) To receive and note the minutes
 - (b) To consider any recommendations contained within the minutes
6. Minutes of the meeting of the Bromsgrove Local Strategic Partnership held on 2nd October 2008 (Pages 15 - 20)
7. Response to the Regional Spatial Strategy Phase 2 Revision Preferred Option (Pages 21 - 70)
8. Response to the Nathaniel Lichfield Partnership Additional Housing Growth Study (Pages 71 - 102)

9. Presentation on Medium Term Financial Plan 2009/2010 and Capital Programme 2009/2010 - 2011/2012 (Pages 103 - 114)
10. Council Tax Base Calculation 2009/2010 (Pages 115 - 118)
11. Street Cleansing Policy (Pages 119 - 136)
12. Financial and Performance Monitoring Report - Quarter 2 2008/2009 (Pages 137 - 176)
13. Improvement Plan Exception Report - September 2008 (Pages 177 - 200)
14. Unreasonable and Persistent Complainants Policy (Pages 201 - 210)
15. To consider any other business, details of which have been notified to the Head of Legal, Equalities and Democratic Services prior to the commencement of the meeting and which the Chairman, by reason of special circumstances, considers to be of so urgent a nature that it cannot wait until the next meeting
16. To consider, and if considered appropriate, to pass the following resolution to exclude the public from the meeting during the consideration of item(s) of business containing exempt information:-

"RESOLVED: that under Section 100 I of the Local Government Act 1972, as amended, the public be excluded from the meeting during the consideration of the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Part I of Schedule 12A to the Act, as amended, the relevant paragraph of that part, being as set out below, and that it is in the public interest to do so:-

- | <u>Item No.</u> | <u>Paragraph</u> | " |
|-----------------|------------------|---|
| 17 | 4 | " |
17. Future Management of Leisure Centres (Pages 211 - 222)

K. DICKS
Chief Executive

The Council House
Burcot Lane
BROMSGROVE
Worcestershire
B60 1AA

25th November 2008

Agenda Item 3

BROMSGROVE DISTRICT COUNCIL

MEETING OF THE CABINET

WEDNESDAY, 5TH NOVEMBER 2008, AT 6.00 P.M.

PRESENT: Councillors R. Hollingworth (Leader), Mrs. J. M. L. A. Griffiths (Deputy Leader), Dr. D. W. P. Booth JP, Mrs. J. Dyer M.B.E., Mrs. M. A. Sherrey JP and R. D. Smith

Observers: Councillor C. R. Scurrall

Officers: Mr. K. Dicks, Mr. H. Bennett, Mr. T. Beirne, Mr. P. Street (during Minute No's 82/08 to 90/08), Mr. M. Bell, Mrs. C. Felton, Mr. D. Hammond, Ms. J. Pickering, Ms. D. Poole, Mr. J. Godwin (during Minute No's 82/08 to 89/08) and Ms. P. Ross

82/08 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors G. N. Denaro and M. J. A. Webb.

The Chairman requested that the Cabinet's best wishes for a speedy recovery be conveyed to Councillor G. N. Denaro.

83/08 DECLARATIONS OF INTEREST

No declarations of interest were received.

84/08 MINUTES

The minutes of the meetings of the Cabinet held on 1st October 2008 and 22nd October 2008 were submitted.

RESOLVED that the minutes be approved as a correct record.

85/08 PERFORMANCE MANAGEMENT BOARD

The minutes of the meeting of the Performance Management Board held on 21st October 2008 were submitted.

RESOLVED that the minutes be noted.

86/08 AUDIT BOARD

The minutes of the meeting of the Audit Board held on 29th September 2008 were submitted.

RESOLVED that the minutes be noted.

87/08 **SPORTS STRATEGY**

Consideration was given to the Bromsgrove Sport and Active Recreation Strategy 2009 to 2012. The Strategy stated the Vision and Values for the delivery of sport and active recreation in the local area.

RESOLVED that the Bromsgrove Sport and Active Recreation Strategy 2009 to 2012 as set out in Appendix 1 to the report be approved.

88/08 **DEPARTMENT FOR CHILDREN, SCHOOLS AND FAMILIES PLAY BUILDER FUNDING - LICKEY END RECREATION GROUND**

The Cabinet considered a report on the proposed increase in the Council's Capital Programme for 2008/09 to facilitate the refurbishment and enhancement of the play area at Lickey End Recreation Ground.

RECOMMENDED:

- (a) that the Capital Programme for 2008/09 be amended to include the sum of £50,000, to be funded from the Department for Children, Schools and Families (DCSF) grant, in respect of the refurbishment/enhancement of the Lickey End Recreation Ground on the basis set out in the report; and
- (b) that the Capital Programme for 2008/09 be amended to include the sum of £15,000, to be funded from Capital Receipts, in respect of enhancing the accessibility of the facilities at Lickey End Recreation Ground on the basis set out in the report.

89/08 **CHRISTMAS LIGHTS**

The Cabinet considered a report on the proposed increase in the Council's Capital Programme for 2008/09 to fund the purchase of new Christmas lights. Over the last 3 years due to wear, tear and age the Christmas lights had diminished significantly. The installation of the new Christmas lights would contribute towards the regeneration of Bromsgrove Town Centre.

RECOMMENDED that the Capital Programme for 2008/2009 be amended to include the sum of £27,000 to fund the Capital elements of the Christmas lights and that this be funded from the Local Authority Business Grant Initiative.

90/08 **BROMSGROVE TOWN CENTRE (MARKET HALL)**

Consideration was given to a report which provided an update regarding the proposals for redevelopment of the market hall site within the wider town centre regeneration project. The report reminded Members of the options which had been available with regard to the future of the market hall site. Appendix 2 of the report gave details of the Official Journal of the European Union (OJEU) procurement process.

RECOMMENDED:

- (a) that the market hall site be marketed in accordance with the Official Journal of the European Union (OJEU) procurement process under a long lease and that specific conditions be placed on the marketing and development of the site in accordance with the issues and options consultation, spatial report results and wider commercial advice;
- (b) that authority be delegated to the Executive Director (Partnerships and Projects), the Head of Legal, Equalities and Democratic Services and the Head of Financial Services to undertake the marketing in accordance with (a) above; and
- (c) that with effect from 1st March 2009 the market hall be closed and officers be tasked with developing a programme that will maximise the letting potential of this site during the intervening period; and that in the event that no interim letting arrangements are achieved, an interim report be presented to the Council to review this option.

91/08 **LOCAL DEVELOPMENT FRAMEWORK WORKING PARTY**

The minutes of the Local Development Framework Working Party held on 23rd October 2008 were submitted.

RESOLVED that the minutes be noted.

92/08 **SHARED SERVICES BOARD**

The minutes of the meeting of the Shared Services Board held on 28th October 2008 were submitted.

RESOLVED that the minutes be noted.

93/08 **SPATIAL PROJECT - PHASE 2**

Consideration was given to a report on the second phase of the Spatial Project modernisation programme. During the past two years since Members had approved the Spatial Project Business Case, the Authority had undergone a considerable amount of change. Many of these changes had, or were likely to, impact on the original scope of phase two of the Spatial Project and had resulted in a revised approach and reworking of the scope for phase two.

RECOMMENDED:

- (a) that the Capital Programme for 2008/09 be amended to include the sum of £101,700 to be funded by capital receipts;
- (b) that the revised scope for phase two including the purchase and implementation of 'SmartPoint' software be approved, subject to (a) above being approved; and
- (c) that the implementation of this software be scheduled to follow the conclusion of phase one be approved, subject to (a) above being approved.

94/08 **COMMUNICATIONS STRATEGY REVIEW 2008**

Consideration was given to a report on the review of the Communications Strategy, originally written in 2006 and updated annually. The review recognised the progress made over the last year and set out how the Council could improve communications even further.

RESOLVED that the updated Communications Strategy Review 2008 set out at Appendix 1 to the report be approved.

95/08 **COMMUNITY ENGAGEMENT STRATEGY**

Consideration was given to a report on the Community Engagement Strategy. The new Community Engagement Strategy attached at Appendix 1, set out ways in which the Council would engage with its communities. The Community Engagement Toolkit attached at Appendix 2, provided a toolkit for officers on the steps to take in planning and executing community engagement activities. The Annual Community Engagement Plan attached at Appendix 3 set out the planned community engagement activities for 2008-09.

RESOLVED that the Community Engagement Strategy set out at Appendix 1, the Community Engagement Toolkit set out at Appendix 2 and the Annual Community Engagement Plan set out at Appendix 3 to the report be approved.

96/08 **COMMUNITY STRATEGY ANNUAL REPORT 2007-08**

Consideration was given to a report on the Local Strategic Partnership Sustainable Community Strategy Annual Report 2007/08. The report detailed performance for the year 2007/08 against the priorities listed in the report and provided information about the performance of the Compact Steering Group and the Communications Theme Group.

RESOLVED that the thanks of the Cabinet be conveyed to the officer involved in producing the report.

RECOMMENDED:

- (a) that the Bromsgrove Sustainable Community Strategy Annual Report 2007/08 at Appendix 1 to the report be approved; and
- (b) that the progress to date against each High Level Action Plan be noted.

97/08 **COMMUNITY STRATEGY UPDATE 2008-2011**

The Cabinet considered a report on the Update of the Sustainable Community Strategy 2008-2011, which set out the overall strategic direction and long-term vision for the economic, social and environmental well-being of a local area. During the discussion the Portfolio Holder for Street Scene and Community referred to the need to ensure that the Strategy covered the needs of 'looked after' children.

RESOLVED that the Assistant Chief Executive requests the relevant Theme Group Chair to include the needs of 'looked after' children in the Children and Young People High Level Action Plan as set out in the report.

RECOMMENDED that the updated Sustainable Community Strategy 2008-2011 be approved and that it be noted that the document had been updated to reflect the new Local Area Agreement 2008-2011.

98/08 **IMPROVEMENT PLAN EXCEPTION REPORT (AUGUST 2008)**

Consideration was given to the updated Improvement Plan Exception Report for August 2008, together with the corrective action being taken.

RESOLVED:

- (a) that the revisions to the Improvement Plan Exception Report and the corrective action being taken be noted and approved;
- (b) that it be noted that, for the 118 actions highlighted within the Plan for August, 81.4 percent of the Plan was on target (green), 3.4 percent was one month behind (amber) and 14.4 percent was over one month behind (red). 0.8 percent of actions had been re-scheduled or suspended, with approval.

99/08 **MEDIUM TERM FINANCIAL PLAN 2009-10 TO 2011-2012**

Consideration was given to a report on the current position on the Medium Term Financial Plan (revenue budgets) for 2009-2010 to 2011-2012, including proposed pressures and savings. During the discussion on budget pressures, Members requested officers to categorise the Customer Service Centre funding required as a high priority not unavoidable.

RESOLVED:

- (a) that, subject to the comment in the preamble above, the unavoidable and high pressures identified in Appendices A and B of the Report, together with those categorised as medium and low as shown at Appendix C of the report, be noted;
- (b) that officers continue to review the pressures and savings with the aim of balancing the budget for 2009-2010 and 2011-2012; and;
- (c) that officers investigate all options to mitigate the potential impact of redundancies across the council.

100/08 **LOCAL GOVERNMENT ACT 1972**

RESOLVED that under Section 100 I of the Local Government Act 1972, as amended, the public be excluded from the meeting during the consideration of the items of business the subject of the following minutes on the grounds that they involve the likely disclosure of "Exempt Information" as defined in part I of the Schedule 12A to the Act, as amended, the relevant paragraphs of that part being set out below, and that it is in the public interest to do so:-

<u>Minute No</u>	<u>Paragraphs</u>
101/08	4
102/08	4

101/08 **REVIEW OF PLANNING AND ENVIRONMENT SERVICES**

Consideration was given to a report on the review of the Planning and Environment Services Department, having regard to the requirements of the 3 year financial plan 2007/2011. Following discussion to clarify with officers the benefits and efficiencies of the operational changes set out in the report it was

RESOLVED that the operational changes set out in Appendix 1 of the report be noted and that the structural changes set out in Appendix 2 of the report be implemented by 1st April 2009.

RECOMMENDED that the Council approve the release of balances to fund the costs associated with the redundancy and early retirement as set out in the report, subject to any redeployment opportunities that may be available.

102/08 **WORCESTERSHIRE HUB - FUTURE STRATEGIC DIRECTION AND ESTABLISHMENT OF SHARED SERVICE**

Consideration was given to a report that provided an update on the work to develop a future strategic direction for the Worcestershire Hub and sought endorsement for the proposed approach for Bromsgrove District Council. Following discussion it was

RECOMMENDED:

- (a) that the Council agree from 1st April 2009 to fund the realignment and subsequent reduction of County Council Hub contributions of £76,000 and that this bid be ranked as a high priority within the Medium Term Financial Plan;
- (b) that the Council agree from 1st April 2009 to adopt Stage One of the proposal, to establish a single telephone contact centre for County Council enquiries, whilst retaining district telephony at the local Hub Customer Service Centre; and
- (c) that the Council endorses the vision and staged approach for the future development of the Worcestershire Hub, as detailed in Appendix 1 to the report and that consideration of Stage Two and Three of this proposal be carried out at a time appropriate to the Council's needs, with robust business cases, including an assessment of costs, risks and benefits to Bromsgrove customers.

The meeting closed at 7.20 p.m.

Chairman

BROMSGROVE DISTRICT COUNCIL

MEETING OF THE OVERVIEW BOARD

TUESDAY, 4TH NOVEMBER 2008 AT 6.00 P.M.

PRESENT: Councillors A. N. Blagg, Mrs. M. Bunker, Miss D. H. Campbell JP, S. R. Colella, Dr. G. H. Lord (during Minute Nos. 8/08 to 9/08), P. M. McDonald and L. J. Turner

Observers: Councillor D. L. Pardoe and Councillor S. R. Peters

Officers: Mr. T. Beirne, Mr. P. Street, Mrs. C. Felton, Mrs. S. Sellers and Ms. D. McCarthy

1/08 **ELECTION OF CHAIRMAN**

RESOLVED that Councillor P. M. McDonald be elected as Chairman for the remainder of the municipal year.

2/08 **ELECTION OF VICE-CHAIRMAN**

RESOLVED that Councillor L. J. Turner be elected as Vice-Chairman for the remainder of the municipal year.

3/08 **APOLOGIES FOR ABSENCE**

No apologies for absence were received.

4/08 **DECLARATIONS OF INTEREST**

No declarations of interest or whipping arrangements were received.

5/08 **MINUTES**

The minutes of the last meeting of the former Scrutiny Steering Board held on 2nd September 2008 were received.

RESOLVED that the minutes be noted.

6/08 **JOINT COUNTYWIDE SCRUTINY ON FLOODING**

Members were reminded of the Joint Countywide Scrutiny on Flooding which involved all local authorities across Worcestershire. For the benefit of those Members who were new to Overview and Scrutiny, the background to the investigation was briefly mentioned and it was stated that the first Joint Flooding Task Group meeting had been held in February 2008.

The Board was informed that during September 2008, a draft report had been circulated to Task Group Members and representatives who had contributed to the investigation. Due to the comments received, the Task Group Chairman had decided that one further meeting was required and this had been scheduled to take place on 6th November 2008. It was anticipated that the report would be finalised and circulated the following week and therefore would be available in time for the joint meeting of the Overview Board and Scrutiny Board due to be held on 2nd December 2008.

RESOLVED that the update relating to the Joint Countywide Flooding Scrutiny be noted.

7/08 **ANTI-SOCIAL BEHAVIOUR AND ALCOHOL FREE ZONES TASK GROUP**

A brief progress report from Councillor Taylor, Chairman of the Anti-Social Behaviour and Alcohol Free Zones Task Group, was read out to the Board which informed Members that a number of representatives had attended the last Task Group meeting including Mr. Evans, Operations Manager (North Worcestershire) from Worcestershire County Council's Youth Support and the District Council's Principal Licensing Officer, Mrs. Smith. It was stated that a review of the information gathered so far would be undertaken at the next Task Group meeting due to be held on 5th November 2008.

There were concerns from Board Members that the subject area the Task Group had been requested to cover was too great. However, it was believed that the Task Group was on schedule to complete its investigation next month and report back to the next meeting of the Overview Board on 6th January 2009.

RESOLVED that the update on the progress of the Anti-Social Behaviour and Alcohol Free Zones Task Group be noted.

8/08 **FORWARD PLAN OF KEY DECISIONS**

Consideration was given to the Forward Plan which included key and non-key decisions due to be taken by the Cabinet over the forthcoming months.

The Chairman requested that the Forward Plan be extended to cover a 6 month period to: ensure the Overview Board was properly informed of future items the Cabinet would be taking decisions on; and to give the Board sufficient time to investigate such items. The Head of Legal, Equalities and Democratic Service responded that although the information being requested might not be available in the present Forward Plan format, Heads of Service could be requested to ensure their Business Plans, which included an annual projection of items coming forward to Cabinet, were accessible to Members of the Overview Board.

Questions were raised on a number of items including: Bromsgrove Town Centre; Review of Planning and Environment Services; Worcestershire Hub; Countywide Air Quality Strategy; and Future management of the Leisure Centres.

There was a particular concern raised in relation to the Countywide Air Quality Strategy and Members questioned what the Strategy could achieve. The Board briefly considered whether or not further investigation was required into this matter, specifically in relation to what the Council planned to do to address air quality issues facing the District. It was pointed out that a number of recommendations had been put forward by the Air Quality Task Group and the majority had been approved. However, officers had been unable to implement them as speedily as they had wished.

RESOLVED:

- (a) that the Head of Legal, Equalities and Democratic Services liaise with other members of the Corporate Management Team to ensure that in future, the Overview Board has access to relevant information contained within Service Business Plans (i.e. items that were expected to be considered by the Cabinet in 3-6 months time);
- (b) that confirmation on the reasons for the delay of the report relating to the review of Planning and Environment Services be circulated to Members of the Board;
- (c) that information relating to the Worcestershire Hub and the Future Strategic Direction and Establishment of Worcestershire Hub Shared Service be circulated to Members of the Board;
- (d) that an informal meeting (possibly on 26th November 2008) between the Chairman, Vice-Chairman, any other interested Overview Board Members and relevant officers be set up for preliminary discussions to be held regarding the Countywide Air Quality Strategy and future plans of the Council to address air quality, with a view to help the Board decide whether or not further investigation by the Board might be required; and
- (e) that all other items on the Forward Plan be noted.

9/08 **WORK PROGRAMME**

The Board considered all the items included within its Work Programme.

RESOLVED that the Overview Board's Work Programme be noted and updated as necessary.

The meeting closed at 6.45 p.m.

Chairman

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Agenda Item 5

BROMSGROVE DISTRICT COUNCIL

MEETING OF THE PERFORMANCE MANAGEMENT BOARD

TUESDAY, 18TH NOVEMBER 2008, AT 6.00 P.M.

PRESENT: Councillors Mrs. M. Bunker, Miss D. H. Campbell JP, S. R. Colella and Mrs. A. E. Doyle

Officers: Mr. T. Beirne, Mr. H. Bennett, Ms. J. Pickering (during Minute No's 62/08 to 66/08) and Ms. P. Ross

62/08 **APPOINTMENT OF CHAIRMAN FOR THE MEETING**

RESOLVED that Councillor S. R. Colella be appointed Chairman of the meeting.

63/08 **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors J. T. Duddy, C. B. Taylor and E. J. Murray.

64/08 **DECLARATIONS OF INTEREST**

Councillor Miss D. H. Campbell JP declared a personal interest in agenda item 7 (Improvement Plan Exception Report), as a member of the Operating Trust of Bromsgrove Arts Centre.

65/08 **MINUTES**

The minutes of the Performance Management Board held on 21st October 2008 were submitted.

RESOLVED that the minutes of the meeting be approved as a correct record, subject to Councillor Miss D. H. Campbell being included in the list of Members present.

66/08 **INTEGRATED FINANCE AND PERFORMANCE REPORT QUARTER 2**

The Board considered a report on the Council's performance and financial position at 30th September 2008. Members raised a number of issues relating to the report on sickness absence and sundry debtors, to which the Head of Financial Services and the Assistant Chief Executive responded. Members requested that information on the green waste service and payments system be included in the next Members Bulletin.

RESOLVED:

- (a) that it be noted that 44% of PI's for which data was available are Improving or Stable;
- (b) that it be noted that 82% of PI's for which data was available are achieving their Year to Date target;
- (c) that it be noted 92% of PI's for which data was available are predicted to meet their target at year end;
- (d) that the successes and areas for potential concern as set out in the 'Council summary' be noted; and
- (e) that detailed information on sickness absence and sundry debtors be made available at the next meeting.

67/08 **SUSTAINABLE COMMUNITY STRATEGY ANNUAL REPORT 2007/08**

The Board considered a report on the Local Strategic Partnership Sustainable Community Strategy Annual Report 2007/08. The report detailed performance for the year 2007/08 against the priorities listed in the report and provided information about the performance of the Compact Steering Group and the Communications Theme Group. Members raised a number of issues relating to the report, to which the Assistant Chief Executive responded. During the discussion the Assistant Chief Executive undertook to provide a copy of the Biodiversity Action Plan and the Water Vole Strategy to the relevant Members.

RESOLVED that the report together with the progress made to date against each High Level Action Plan be noted.

68/08 **SUSTAINABLE COMMUNITY STRATEGY 2008 - 2011 UPDATE**

The Board considered a report on the Update of the Sustainable Community Strategy 2008-2011, which set out the overall strategic direction and long-term vision for the economic, social and environmental well-being of a local area.

RESOLVED

- (a) that it be noted that the full Council had ratified the updated Sustainable Community Strategy 2008-2011; and
- (b) that it be noted that the document had been updated to reflect the new Local Area Agreement 2008-2011.

69/08 **IMPROVEMENT PLAN EXCEPTION REPORT (SEPTEMBER 2008)**

The Board considered the Improvement Plan Exception Report for September 2008, together with the corrective action being taken as set out in appendix 1 to the report.

RESOLVED:

- (a) that the revisions to the Improvement Plan Exception report together with the corrective action being taken be approved; and
- (b) that it be noted that for the 134 actions highlighted for September within the plan 73.9 percent of the Improvement Plan was on target (green), 6.0 percent was one month behind (amber) and 11.9 percent

was over one month behind. 8.2 percent of actions had been reprogrammed with approval.

70/08 **PMB RECOMMENDATION TRACKER**

Consideration was given to the report tracking progress on recommendations and decisions made by the Board from April 2007 to December 2007. During the discussion the Assistant Chief Executive undertook to provide further information on the Government's response to Dame Carol Black's report, (Meeting date 18th March 2008, Minute Ref. 93/07).

RESOLVED that the recommendation tracker report be noted.

71/08 **WORK PROGRAMME 2008/09**

Consideration was given to a report on the Board's updated work programme for 2008/09.

RESOLVED:

- (a) that following the completion of Phase 1 of the Spatial Project, the Spatial Project Monitoring Report be removed from the February 2009 work programme; and
- (b) that the report be noted.

The meeting closed at 7.35 p.m.

Chairman

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Bromsgrove Partnership Board

2nd October 2008

MINUTES

Present:

Liz	Altay	Worcestershire PCT
Tony	Beirne	Bromsgrove District Council
Hugh	Bennett	Bromsgrove District Council
Louise	Berry	Bromsgrove District Council
Mike	Brown	Bromsgrove District Housing Trust
Maggie	Bryan	Worcestershire County Council
John	Cypher	Parish Councils Representative
Mike	Dunphy	Bromsgrove District Council
Cllr	Hollingworth	Bromsgrove District Council
Roger		
Mike	McCarthy	NEW College
Cllr Ed	Moore	Worcestershire County Council
Elaine	Mortimore	Bromsgrove Youth Homelessness Forum
Richard	Savory	Bromsgrove District Council
Dave	Shaw	West Mercia Police
Ann	Sowton	Bromsgrove & Redditch Network
Phil	Street	Bromsgrove District Council
Mark	Weaver	Independent (Chair)

Item 1 APOLOGIES

Sue	Baxter	Parish Councils Representative
Kevin	Dicks	Bromsgrove District Council
Rachel	Jones	Worcs. Energy Efficiency Advice Centre
Tony	Love	West Mercia Police

ACTION

Item 2 WELCOME & INTRODUCTIONS

MW welcomed all to the meeting and introductions were made.

Item 3 MINUTES OF MEETING 7TH AUGUST 2008 & MATTERS ARISING

The minutes were approved as a true record.

Matters Arising

Climate Change – HB will be putting forward a budget bid to appoint an officer to move this agenda forward. BDHT had withdrawn the offer of part funding the post as the work will have a focus on private housing.

Local Area Agreement Reward – HB had written to the Chair of the Worcestershire Partnership asking that consideration be

given to district LSPs being allocated some of the reward target from LAA 1.

Worcestershire Sustainable Community Strategy – MB had suggested that work be done to map the obstacles in attaining targets. HB reported that Brian Nicholls (Improvement Manager based in HB's team) was currently fully occupied with other work, but would factor into his schedule in the future.

Olympics – KD to feed back to the next meeting.

Kevin Dicks

Item 4

THEME GROUP PRESENTATION: OLDER PEOPLE

The theme group was set up during the revision of the SCS in 2007. The group first met in October 2007 and is now a vibrant, well attended meeting. Three priorities were agreed for the High Level Action Plan: Older people and communication, access to services and information and advice.

Older People's Directory – partners will maintain their own information but share regularly, honing down to individual services. The Red Directory is produced and circulated by a free newspaper. AS is actively encouraging groups to put information into the directory. AS to discuss with Anne-Marie Darroch (BDC Communications Manager) about getting the directory circulated to a wider audience, or through Together Bromsgrove.

Ann Sowton

Access to Services – a mapping exercise has been undertaken, which will need to link to the older people's focus groups that were held over the summer. Consultation was done on 1st October 2008 (National Older People's Day), which was paid for by the LSP. AS had also attended the CDRP away day in July and also made links with Emma Barton, the Health Improvement Practitioner. EB will lead on older people and alcohol and an awareness day will be held in early 2009 for mental health (which sits under the remit of the Health & Well Being Theme Group with EB being the link). AS aims to have older people's issues on each theme group agenda during the next year.

Communication- Thinking about how we communicate and different ways of doing so. AS is recruiting champions to consult with (2 to date) to help with networking and letting other older people know what is happening in the district (eg in day centres etc). Links are made to national, regional and local campaigns – e.g. falls prevention and the DWP pensioner poverty campaign. AS would like to do some work with older people around these issues in the district's hotspots.

BBC 70 Not Out Campaign – AS would like to do some intergenerational project work on the back of this campaign to share skills, and help to keep older people full of energy and vitality, and valued as part of the community.

Don't Stop Me Now - HB discussed the recently published Audit Commission report, which has implications for BDC. A scrutiny exercise is to be carried out which will need to link to the theme group; however, funding is an issue and it is hard to turn ideas into reality without some pump priming from the LSP partner organisations.

HB discussed a budget bid for an intergenerational project, but felt that it may not be approved. AS to discuss potential funding with Mike Brown. There is also £1K available via the PCT LSP funding.

Ann Sowton

PS noted that BDC is looking to extend and develop its Lifeline service, which helps older people to live independently. Worcestershire also has University of the Third Age. He felt that there may be an opportunity to link schools to seniors' groups in order to break down some of the barriers.

Item 5

PERFORMANCE UPDATES:

Community Improvement Plan

The exception report for April – August 2008 was presented.

- Town Centre – 3.3.1 – Marks & Spencer had pulled out of negotiations due to the economic climate and therefore a tender for the land sale has been sent out via OJEU to seek a new developer.
- Railway Station – 10.1.1 – Funding gap of approximately £6.7 million. Discussions being held to try to resolve the issue.

Key Deliverables

91% of the key deliverables were on target to August 2008.

Item 6

BOARD MEMBERSHIP, CHAIR & GOVERNANCE

Board Membership – RH asked whether the Fire & Rescue Service should be invited to join the Board. HB suggested that the blue light services were represented by the Police and that the Fire & Rescue Service could sit on appropriate theme groups, e.g. CDRP, Town Centre etc. HB emphasised that it was important to keep the Board relatively small. This approach was accepted.

Chair – MW had stated his intention to step down as Chair at the February 2009 meeting. It was agreed that a commercial sector representative is still required. RH had spoken to someone who may be interested. RH to bring his CV to the December Board meeting.

Roger
Hollingworth

Governance - The White Paper "Communities in Control" indicates that the Leader of the Council should now act as the Board Chair, and therefore it was proposed that RH fulfils that role. RH thanked MW for his contribution to the Board.

Item 7

TOWN CENTRE

Plans for the redevelopment sit within the Local Development Framework and Core Strategy.

Richard Savory informed the Board that he had been in post since April 2008, (joint BDC/WCC funded post) and had focused on defining what the regeneration programme is and what it means; getting mandates from partners to execute the project; and had worked on a public consultation to define the programme in the light of what residents said.

A Project Initiation Document had been approved, and the project has elected sponsorship by Councillors Roger Hollingworth and Dr George Lord. PS is the project owner.

The consultation had been successful, with approximately 1,000 responses received. The project is moving towards the delivery, design and development phase and RS is keen to have full engagement with stakeholders.

There will be a project forum and all theme group chairs will be invited to join to ensure all needs are recognised/met, as individual theme group activities will contribute towards a successful regeneration programme.

RS was discussing the possibility of having a regeneration project presence in the town centre (e.g. a shop) with the Regional Development Agency. RS will also explore the possibility of using part of the market hall.

The regeneration will potentially create a new 'blue light' area, civic centre, retail outlets on Windsor Street and an older people's care village.

RS noted that the project is a huge partnership effort, which is starting to move apace.

Item 8

NEW COLLEGE – PRESENTATION

MMcC talked about the work of the college and the services it provides. (Presentation slides circulated with agenda).

The College received "Outstanding Provider" status from Ofsted and host the only Harley Davidson training facility in Europe.

AS to talk to McC about potential activities for older people.

Ann Sowton

Item 9

CORE STRATEGY

The draft strategy had been circulated. The new planning system is meant to be more responsive and sets out a 20 year spatial vision. All policies should dovetail in future at national, regional

and local level. There are 15 policies in the strategy. Some of the main ones are: climate change; distribution of housing (potentially the most controversial policy); high quality employment distribution; retail offer and the town centre; transport; biodiversity; and accommodation for gypsies, travellers and show people.

There will be a consultation period from November 2008 – January 2009 with a health warning about the housing issues, followed by an examination in public to test the achievability and sustainability of the strategy. Timescales will, however, be dependent on the Regional Spatial Strategy. The LSP will be consulted on the strategy.

Item 10 **WORCESTERSHIRE PARTNERSHIP UPDATE**

Sustainable Community Strategy – Approved by WCC Full Council in mid-September and had been through BDC's democratic process.

Learning to Deliver –A risk and reward assessment had been carried out on each LAA indicator, leading to a proposal that the project focus on NI 186 (CO₂ emissions) and NI 187 (fuel poverty). The proposal builds on an existing project in Wychavon and will produce a thermal imaging heat loss picture of the county to identify houses that are not energy efficient. The information will then be overlaid with the locations of elderly and other vulnerable residents. The proposal was endorsed by the Worcestershire Partnership Management Group on 10th September.

Item 11 **COMMUNICATIONS UPDATE**

A theme group to consider economic regeneration, in particular getting people off benefits and into work, will be convened, to be chaired by Marie Green of BDHT.

Item 12 **ANY OTHER BUSINESS**

RH discussed the South Market Housing Area and £38 million that is potentially available for affordable housing. Ten councils in the SMHA are working together to develop a strategy to hopefully secure the funds.

HB thanked McC for the hospitality shown by NEW College to the LSP.

On behalf of the Board, HB thanked LB for her hard work over the last 3 years with the LSP and wished her well in her new post.

Item 13 **DATE OF NEXT MEETING**

2.00pm, 4th December 2008.

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BROMSGROVE DISTRICT COUNCIL

CABINET

3RD DECEMBER 2008

BROMSGROVE DISTRICT COUNCIL RESPONSE TO THE REGIONAL SPATIAL STRATEGY PHASE 2 REVISION PREFERRED OPTION

Responsible Portfolio Holder	Cllr Jillian Dyer
Responsible Head of Service	Dave Hammond
Non Key Decision	

1. SUMMARY

- 1.1 The following report summarises the detailed response of Bromsgrove District Council to the Regional Spatial Strategy (RSS) - Phase 2 Revision preferred option.

2. RECOMMENDATION

- 2.1 That the attached appendix 1 is submitted in response to the RSS Phase 2 revision, with the specific representations on the issues below;
- A. BDC objects to the level of Redditch related housing and employment growth to be provided within Bromsgrove and/or Stratford, in locations adjacent to Redditch Town, when alternative more strategically viable sites within the District are available.
 - B. BDC objects to the designation of Redditch as a Settlement of Significant Development, particularly in relation to the future implications for this growth within Bromsgrove's Green Belt.
 - C. BDC is concerned that the low housing allocation for Bromsgrove district up to 2026 will not allow the District to address its well documented affordable housing needs.
 - D. In response to issue C above, and on the basis of the attached supporting documentation (appendix 1), BDC requests a higher housing allocation of up to 4000 housing units for Bromsgrove District, to be located in suitable sustainable locations to be determined by BDC through the Spatial Planning Process.
 - E. BDC is concerned that if the RSS does allocate housing and employment land to the periphery of Redditch town, the RSS should as far as possible clearly determine the exact requirements to be developed in Bromsgrove, Redditch, and Stratford districts.

3. BACKGROUND

- 3.1 The Regional Spatial Strategy was published in June 2004. At that time, the Secretary of State supported the principles of the strategy but suggested

several issues that needed to be developed further. The Revision process is being undertaken by the West Midlands Regional Assembly (WMRA) in three phases.

Phase 1 – the Black Country study, this phase was formally adopted in January 2008.

Phase 2 – Covers housing figures, employment land, town and city centres, transport, and waste, the preferred option of this phase is the subject of this report.

Phase 3 – covers critical rural services, culture/recreational provision, various regionally significant environmental issues and the provision of a framework for Gypsy and Traveller sites, and was launched on 27th November 2007.

3.2 The RSS phase 2 revision was formally submitted to the Secretary of State on 21st December 2007. The submission was made up of the following documents,

- The Preferred Option
- An Overview Document
- Background Technical Studies
- The Implementation Plan
- The Consultation Statement
- The Sustainability Appraisal Report
- The Habitat Regulations Assessment
- A Summary Leaflet
- A Submission Letter

3.3 Following this formal submission, the West Midlands Regional Assembly received a letter from Baroness Andrews, Parliamentary Under-Secretary of State in the Department for Communities and Local Government. In her letter, dated 7th January 2008, the Minister expressed concern about the housing proposals put forward by the Assembly in light of the Government's agenda to increase house building across the country. In view of this, the Minister asked the Government Office for the West Midlands to commission further work to look at options which could deliver higher housing numbers. This work will then be considered as part of the Examination in Public. The commissioning and completion of the additional work has caused a significant delay in the process with the consultation deadline being extended to 8th December 2008. Consultants Nathaniel Lichfield Partnership has now completed this further work and a separate report has been prepared in response to this study.

3.4 Contents of the full Response

As detailed above the full response can be seen at Appendix 1, the representations outlined in Para 2.1 above are the specific outcomes of much lengthier comments on many aspects of the RSS preferred option.

In some instances where officers at both Bromsgrove District Council and Redditch Borough Council have the same views on a proposed policy it is suggested both councils will be submitting identical wording on the revision. Specific comments on other policies within the RSS are summarised below. Only policies where there is disagreement or concern over a specific element have been commented upon. Where no comment has been made it is judged that the policy either has no impact on the district, or there is no contention about the contents of the policy.

3.5 Chapter 2: Towards a More Sustainable Region

Policy SR1 Climate Change

BDC generally supports this policy although expresses concern over the shift in emphasis on the protection of the green belt and the impact this may have on the delivery of Brownfield land.

3.6 Policy SR2 Creating Sustainable Communities

Detailed comments have been prepared jointly by BDC and RBC in respect of Redditch's designation as a Settlement of Significant Development (SSD). This designation means Redditch could become a focus for additional growth, over and above that currently being proposed by the RSS revision. The justification for the SSD status has been questioned as Redditch was not included as a focus for major growth, either in the original RSS or in the early stages of the revision. The ability of Redditch to meet other SSD criteria such as, high quality public transport links to surrounding settlements, and an emphasis on Brownfield development are also questioned. It is suggested for reasons such as these Redditch is not designated an SSD.

3.7 Policy SR3 Sustainable Design and Construction

BDC support this policy although it is suggested that some of the wording is amended to remove potential loop holes, and to clarify exactly what is expected from new developments, in respect of sustainable building techniques and energy efficiency.

3.8 Chapter 3: The Spatial Strategy for the Development of the West Midlands

This chapter contains no specific policies although attempts to explain much of the rationale behind what the RSS is attempting to achieve.

BDC and in some instances combined with RBC has made specific comments on the contents of this chapter, questioning where sections

appear to be contradictory, or in some cases where suggested policy approaches do not compliment the overall strategy of the RSS. Further evidence is provided on the implications of allocating Redditch as a SSD. Specific comments are also made in response to the relaxation of the green belt objectives in the West Midlands, which have been altered to allow for green belt boundaries to be adjusted if exceptional circumstances exist.

3.9 Chapter 5: Rural Renaissance

Policy RR1 Rural Renaissance

BDC express concern about the impact on Bromsgrove's rural areas of developing substantial new housing and employment around Redditch. The policy aims to meet local needs and protect local character, none of which is being done through the peripheral expansion of Redditch into Bromsgrove.

3.10 Chapter 6: Communities for the future

This chapter is the most contentious of the Phase 2 revision; it contains revised policies on the location, scale and type of housing to be delivered across the region up to 2026.

Considerable information has been prepared on the impacts of these proposals on Bromsgrove in relation to, the allocation of Redditch related growth in Bromsgrove, the designation of Redditch as a SSD, and also the ability of the district to meet its affordable housing requirements.

3.11 Policy CF2 Housing Beyond Major Urban Areas, and Policy CF3 Level and Distribution of New Housing Development.

The prepared evidence outlines the implications of the allocation of 6600 dwellings to Redditch and the likelihood that the majority of them would have to be developed on green field, greenbelt sites in Bromsgrove, with a potential land take of approximately 300 hectares.

Although more evidence is provided in the response to policy CF7 the implications of the low housing allocations, in relation to restricting the district's ability to meet its affordable housing needs is also expressed in this section.

3.12 Policy CF4 Phasing of New Development

This policy is generally supported although concerns are expressed about how the policy can respond to external pressures such as the current economic climate, and the impact that it is already having on the development industry and house building rates.

3.13 Policy CF5: The Re-use of land and buildings for housing

This policy is supported although it is highlighted that, due to previous levels of Brownfield development in the district and the potential Greenfield

release at Redditch, the District council will be unlikely to meet the target of 60% of new development on previously developed land.

3.14 Policy CF7 Delivering Affordable Housing

The principle of delivering affordable housing is one which is supported, although evidence has been prepared to support the allocation of up to 4000 houses in the district, in order to provide some of the much needed affordable housing, and in an attempt to rebalance the housing market. The recently completed housing market assessment, alongside other technical studies provides much of the justification for the additional housing. It is also stated that if the low allocation is maintained through to adoption of the RSS, then it severely restricts the district in its effort to meet the aims of the not only the Core Strategy, but also the Sustainable Community Strategy.

3.15 Policy CF8 Delivering Mixed Communities

Again this policy is supported but further evidence is provided highlighting how the low allocation would restrict the district in delivering a mixed and sustainable community. The need to provide higher levels of 2 and 3 bed properties in order to meet the needs of young families and the increasing older population, is clearly stated. The wider implications of not providing a mixed community are also identified, such as delivering the Technology Park and Regenerating the Town Centre.

3.16 Policy CF10 Managing Housing Supply

As stated above it is believed that an allocation of up to 4000 houses should be made to the district for the period 2006 to 2026. Evidence has been submitted drawing on much of the work done in developing the Core Strategy, clearly demonstrating where there is capacity in the district to accommodate the additional dwellings.

3.17 Chapter 7 Prosperity for All

Policy PA1 Prosperity for All

Support is given to the broad principles of this policy, although concerns are expressed at the requirement for meeting some of the economic needs of the MUA outside its boundaries. This is assumed to be at the SSD's and as such BDC and RBC have reiterated previous concerns about the impact of additional development being focussed on Redditch.

3.18 Policy PA3 High Technology Corridors

This policy is supported, although reference is made to Bromsgrove being identified as a key node on the High Technology Corridor. This designation arises due to the location of Bromsgrove Technology Park, although the significance appears to have been overlooked in respect of the housing allocations not being complementary to supporting the development of the Technology Park.

3.19 Policy PA6A Employment Land Provision

Further evidence is available in relation to the current employment land supply, and the lack of significance the Technology Park has been given in providing opportunities for economic growth in Bromsgrove.

3.20 Policy 6B Protection of Employment Land and Premises

The continued inclusion of this policy is welcomed, and it is stressed that policy CP8 in the draft Core Strategy builds on this RSS policy, and strengthens the protection of employment land in the district from non employment uses.

3.21 Policy PA12B Non-Strategic Centres

This policy is fully supported and recognises the importance the Town Centre has in the lives of residents. It is stressed that the inability to meet the identified housing needs through the housing allocation could have a detrimental effect on the regeneration, and subsequent vitality of the Town Centre.

3.22 Policy PA14 Economic Development and the Rural Economy and Policy PA15 Agriculture and Farm Diversification

BDC considers that adequate consideration has not been given to the implications of Redditch growth on the agricultural economy, and the significance of the potential loss of 300 hectares of agricultural land.

3.23 Chapter 8 Quality of the Environment

Generally supportive of the whole chapter most of which has remained unchanged from the current RSS, with the exceptions of the comments below.

3.24 Policy QE4 Greenery, Urban Greenspace and Public Spaces

General support although additional growth at Redditch could lead to severance of the green corridor along the Arrow Valley, and the loss of land which currently has an unknown biodiversity value.

3.25 Policy QE 5 Protection and Enhancement of the Historic Environment

Supportive of policy approach although, concerned about the resources needed to meet the requirements of this policy upon implementation of the Heritage Protection Review.

3.26 Policy QE6 The Conservation, Enhancement and Restoration of the Regions Landscape

Welcome and support this policy, but concerned that substantial tracts of its landscape will be adversely affected due to the implications of proposals for Redditch growth within the District's Green Belt.

3.27 The final sections of the review deals with Waste and Transport issues. As it is the County Councils responsibility to implement these policies in the first instance, it was felt appropriate to endorse the responses made by the County Council, and as such those responses have not been summarised

in this report. The County Councils comments can be seen in the full Response in appendix 1

3.28 However BDC also has specific comments to make on the following policies:

Policy T5 Public Transport and T6 Strategic Park and Ride

Supports the above policies and in particular the potential location of a Park and Ride facility in Bromsgrove. This will reinforce the function of the proposed new railway station as a pivotal rail focus for North Worcestershire.

4. FINANCIAL IMPLICATIONS

Whilst there are no direct implications of the RSS revision at the moment, the levels of income generated over longer periods could be affected depending on the scale and type of development taking place in the district.

5. LEGAL IMPLICATIONS

The RSS is the responsibility of the West Midlands Regional Assembly and is being prepared under the regulations of the Planning and Compulsory Purchase Act 2004; the district council also has an obligation under the Act to prepare Local Development Documents in line with the Local Development Scheme.

6. COUNCIL OBJECTIVES

6.1 **Council Objective One: Regeneration** Priorities A Thriving Market Town and Housing

The impact of the RSS is fundamental to the meeting of this objective. Whilst the RSS does not mention Bromsgrove Town specifically as outlined above, there are policies in the RSS which encourage non strategic centres such as Bromsgrove Town to be proactive in attracting appropriate development to maintain and enhance their function. The response supports this approach although does question if the ability to redevelop the town centre is restricted by the low housing allocation and the subsequent demographic imbalance in the district.

The response clearly attempts to address the housing objective by making a clear case as to why Bromsgrove District should receive an increased allocation of housing, in an attempt to tackle the lack of affordable housing in the district.

The RSS and the Councils response to it may have some minimal impacts on the other council objectives although none are seen as significant at this time.

7. RISK MANAGEMENT

7.1 The main risks associated with the details included in this report are:

- Inability to influence the RSS to such an extent that, proposals in the adopted RSS limit the ability of the District Council to prepare Spatial Planning Documents which adequately address the identified needs, and opportunities the district possesses.

7.2 These risks are being managed as follows:

Risk Register: Planning and Environment

Key Objective Ref No: 6

Key Objective: Effective, efficient, and legally compliant Strategic planning Service

7.3 The District Council as the local planning authority has to prepare a development plan in the form of the Development Plan Documents (DPD) contained in the Local Development Framework. The planning system requires that all DPDs are in general conformity with those documents which are at a higher level in the cascade of planning policy. The highest level of policy being national Planning Policy Guidance and Planning Policy statements. The RSS is the plan which guides development across the whole of the West Midlands region, and as such the policies in the Bromsgrove District Core Strategy have to be in general conformity with those in the RSS. The ability to address issues through planning could be severely restricted if the policies at a higher level do not contain sufficient flexibility in both housing, and employment allocations for Bromsgrove District.

8. CUSTOMER IMPLICATIONS

8.1 The impact of the RSS is wide ranging and it is difficult to say at this point in time what the exact implications on customers will be.

9. EQUALITIES AND DIVERSITY IMPLICATIONS

9.1 None

10. VALUE FOR MONEY IMPLICATIONS

10.1 None

11. OTHER IMPLICATIONS

Procurement Issues - None

Personnel Implications - None
Governance/Performance Management - None
Community Safety including Section 17 of Crime and Disorder Act 1998 - None
Policy - The policy decisions taken at a regional level directly affect the ability to generate local planning policies.
Environmental - the policies included in the RSS wherever possible try to limit the impact on the environment, although it is inevitable when creating policies which are dealing with substantial levels of new growth that there will be adverse impacts on the environment. It is the responsibility of local planning authorities, and other agencies implementing the policies in the RSS to ensure that all environmental issues are fully considered in all new development proposals.

12. OTHERS CONSULTED ON THE REPORT

Portfolio Holder	Yes
Chief Executive	Yes
Executive Director - Partnerships and Projects	Yes
Executive Director - Services	Yes
Assistant Chief Executive	Yes
Head of Service	Yes
Head of Financial Services	Yes
Head of Legal, Equalities & Democratic Services	Yes
Head of Organisational Development & HR	No
Corporate Procurement Team	No

13. WARDS AFFECTED

All Wards

14. APPENDICES

Appendix 1 Bromsgrove District Council formal response to the Regional Spatial Strategy Phase 2 Revision Preferred Option

15. BACKGROUND PAPERS

- West Midlands Regional Spatial Strategy Phase 2 Revision Preferred Option
- Draft Core Strategy Bromsgrove District Council 2008
- Bromsgrove District Local Plan 2004

- Bromsgrove Town Centre Area Action Plan Issues and Options
- Bromsgrove District Employment Land Review 2008
- Bromsgrove Sustainable Community Strategy 2007-2010
- Draft Climate Change Bill March 2007
- Draft Heritage Protection Bill 2007
- PPS1 Delivering Sustainable Development
- PPS1 Supplement Planning and Climate Change
- PPG2 Green Belts
- PPS3 Housing
- PPS7 Sustainable development in Rural areas
- PPS9 Biodiversity and Geological Conservation
- PPG13 Transport
- PPG15 Planning and the Historic Environment
- PPS22 Renewable Energy
- PPS25 Development and Flood Risk
- West Midlands Sustainability Checklist
- Joint Study into Future Growth Implications of Redditch Town to 2026
December 2007 White Young Green
- Study into the Future growth Implications of Redditch Second Stage
report 2008 White Young Green
- Redditch response to WMRSS Phase 2 Revision
- Worcestershire County Council Cabinet Report 5 March 20087 item 9
West Midlands Regional Spatial Strategy Phase Two Revision
- The Taylor Review of Rural Economy and Affordable Housing
- Bromsgrove District Council: District Level Housing Market Assessment
- Bromsgrove District Council Housing needs Survey
- A Strategic Housing Market Assessment For The South Housing Market
Area Of the West Midlands Region
- Assessing the Rural Content of Regional Spatial and Housing
Strategies, Report for the Commission for Rural Communities
- WMRSS – Phase Two revision: Communities for the Future Housing
Background Paper
- West Midlands Regional Housing Strategy
- National Planning and Housing Advice Unit - Various reports
- Natural Environment and Rural Communities Act
- Worcestershire Landscape Character Assessment

CONTACT OFFICER

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West Midlands Regional Spatial Strategy Phase Two Revision

Consultation Response Form on the West Midlands RSS Phase Two Revision
Draft submitted by the West Midlands Regional Assembly

Making Comments

It is very helpful to us if you use this form to make your comments and if possible e-mail or post it to the following:

WMRSS Panel Secretary
c/o Government Office for the West Midlands
5 St Philip's Place
Colmore Row
Birmingham B3 2PW

E-mail: wm.panelsecretary@gowm.gsi.gov.uk

Deadline for Comments

Deadline for receipt of completed forms is **12.00pm on 8th December 2008**

Additional Copies

Additional copies of the form can be downloaded from the Government Office for the West Midlands web site at <http://www.go-wm.gov.uk> or www.wmra.gov.uk or can be requested by contacting Government Office for West Midlands on: 0121 352 5476.

How to complete this form

Please complete a separate copy of the form for each matter that you wish to comment on, showing each time which policy or paragraph of the WMRSS Phase Two Revision Draft Submission documents you are commenting on.

Please note that all comments will be made available for the public to read – they cannot be treated as confidential. However, please be assured, WMRSS Panel Secretary will only use the contact details provided for the sole purpose of distributing appropriate information about this consultation and the next stages of the process.

Contact Details

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First Name or initial	Michael
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**West Midlands Regional Spatial Strategy
Phase 2 Revision- Draft
Preferred Option
December 2007**

Response from Bromsgrove District Council

1 Bromsgrove District Council (BDC) welcomes the opportunity to comment on the Draft Revision.

1.1 BDC acknowledges that responses should be supported by robust evidence. Since the West Midlands Regional Spatial Strategy (WMRSS) Spatial Options consultation stage a considerable body of evidence in the form of studies and research commissioned to support the production of the Draft Core Strategy has been amassed. This process is ongoing and our evidence base will continue to be developed and refined as the Draft Revision progresses to Examination in Public (EIP). BDC has drawn upon this evidence base in responding to the current consultation exercise and will provide any additional information as required for the EIP.

1.2 In overall terms BDC accepts that the Draft revision strikes an appropriate balance between keeping the terms of the existing regional strategy and its aims, meeting established housing and development needs and promoting sustainable development. Whilst BDC is submitting a comprehensive response with a wide range of detailed and important objections, this does not detract from our in principle support for the strategic aims of the WMRSS. In some instances below and where identified the comments are made jointly and in agreement with Redditch Borough Council (RBC). Comments have been made in relation to specific policies although in many instances can be applied to many areas of the RSS revision document.

1.3 BDC is however concerned that the draft revision suffers from a number of significant omissions. We do not believe that the omissions identified are beyond the scope of the current phase 2 partial review defined by the Secretary of State. Further, it is essential that the WMRSS address these omissions in order to enable subsequent Development Plan Documents (DPD's) to develop effective policies and proposals as a means of bringing forward key elements of the RSS.

1.4 BDC consider the following headlines summarise our main concerns and/or objections:

- A. BDC objects to the level of Redditch related housing and employment growth to be provided within Bromsgrove and/or Stratford, in locations adjacent to Redditch Town, when alternative more strategically viable sites within the District are available.
- B. BDC objects to the designation of Redditch as a Settlement of Significant Development, particularly in relation to the future implications for this growth within Bromsgrove's Green Belt.

- C. BDC is concerned that the low housing allocation for Bromsgrove district up to 2026 will not allow the District to address its well documented affordable housing needs.
- D. In response to issue C above, and on the basis of the supporting documentation, BDC requests a higher housing allocation of up to 4000 housing units for Bromsgrove District, to be located in suitable sustainable locations to be determined by BDC through the Spatial Planning Process.
- E. BDC is concerned that if the RSS does allocate housing and employment land to the periphery of Redditch town, the RSS should as far as possible clearly determine the exact requirements to be developed in Bromsgrove, Redditch, and Stratford districts.

2 TOWARDS A MORE SUSTAINABLE REGION

Key issues in the West Midlands

2.1 **RSS Paragraph 2.20 - Climate Change Page 19** BDC welcomes the recognition of the importance of the global and urgent issue of climate change, and the priority given to this early in the Strategy. However, it is important to acknowledge that the impacts arising from a changing climate are already being faced. Paragraph 2.16 appears to imply that the effects of climate change are due to be felt at some time in the future, thereby failing to convey the urgency of the situation. It should be made explicit that the changing climatic conditions referred to in paragraph 2.27 will be experienced both within the plan period and beyond.

2.2 BDC and RBC question whether large scale greenfield development around Redditch will serve the local economy and not increase CO₂ emissions from additional commuters, especially given the poor sustainable transport links to the majority of its neighbouring towns, as raised later in this response.

This paragraph also states that:

The scale of change and development in the MUA's (Major Urban Areas), which is necessary to meet the objectives of both economic and environmental transformation, and the proposed growth at the Settlements of Significant Development, provide an opportunity to make a significant contribution to the reduction in growth of carbon dioxide emissions.

2.3 BDC consider that the opportunity should be taken to expand the text to emphasise that all development has a role to play in contributing towards reducing carbon emissions. Furthermore, as it is known that Europe is urging the Government for more challenging targets, the Strategy should set targets towards achieving the Government's target of a 26-32% cut in carbon dioxide emissions by 2020.

2.4 It should also be acknowledged that minimising emissions from new development is only part of the equation. Growth in emissions will still emanate from the existing building stock and therefore greater emphasis should be

placed on the potential for existing buildings to mitigate and adapt to climate change.

SR1 Climate Change (*RSS page 21*)

2.5 This policy is welcomed by BDC, however, the opportunities described in section A should relate to all new development and not be limited to MUA's and Settlements of Significant Development (SSD) for example, by expanding Section C to require all new development to develop and use renewable energy.

2.6 In **paragraph 2.24** the emphasis is on bringing forward the development of brownfield land and this is reinforced throughout the RSS without acknowledgement of the practical difficulties in bringing forward such development in a timely fashion. Furthermore, by weakening the argument for the protection of the Green Belt (paragraphs 3.3 and 3.9), it is not difficult to imagine where the thrust of new development is likely to be focussed. BDC therefore considers that the weakening of the Green Belt policy is regrettable and self defeating, particularly in the delivery of brownfield development.

2.7 Clarity would be improved if this policy was split into mitigation and adaptation sub sections, and there should be reference in this overarching policy of a target for CO2 reduction.

2.8 BDC consider that SR1D is unnecessary. It should be a given that all policies will be monitored and reviewed. Mechanisms for achieving this should be clarified in Chapter 10 Implementation and Monitoring.

SR2 Creating Sustainable Communities (*RSS page 22*)

2.9 **Paragraph 2.22** – Promote a good public transport network which is linked to other nearby towns.

BDC and RBC both agree that:

2.10 This paragraph clearly indicates that the designations of SSDs were determined by, amongst other things, the ability to provide 'good public transport, well linked to other nearby towns'. Redditch has good links to Birmingham (rail and bus). However, there are no rail links to neighbouring Worcestershire and Warwickshire towns, and bus links are poor in comparison to links with the conurbation. This is well documented in the Worcestershire and Redditch Sustainable Community Strategies. As local authorities have no control over transport companies and currently transport links within Redditch itself are in decline with respect to evening services, BDC and RBC are unsure how transport links could be secured for improvement through development within Redditch town. There is concern that good public transport links could fail to materialise leaving an increase of commuters in Redditch with a greater reliance on private car travel which would be contrary to Policy SR2, 'Creating Sustainable Communities'.

2.11 Other SSD locations which had a previous designation of sub-regional foci (SRF) had the considerable benefit of bidding for funding to secure sustainable transport infrastructure. Without prior knowledge of such a designation for Redditch, funding opportunities were not applied for. This lack of potential funding would leave Redditch at a distinct disadvantage and would be in conflict with Policy SR2 F *“to provide of the necessary public transport infrastructure so as to improve accessibility to employment, services and facilities both within and between settlements”*

2.12 BDC would also comment that any extension to Redditch that aims to mirror the low density and high levels of open space that the borough currently experiences could potentially be at odds with *“the delivery of sustainable communities that are designed and planned at an appropriate size scale and density.”*

RSS Paragraph 2.24 – Emphasis on development on brownfield land.

BDC and RBC both agree that:

2.13 This paragraph clearly states that beyond the MUAs, significant development should be brought forward; focussed in the SSDs with an emphasis on development of brownfield land as a principle focus. The proposed allocation of 6600 dwellings to meet Redditch Borough’s natural growth will have to be predominantly sited on greenfield, moreover, Green Belt land. The Draft Preferred Option states that 3300 dwellings to meet Redditch related growth are to be located in Bromsgrove and/or Stratford-on-Avon Districts; all 3300 dwellings will be on Green Belt land.

2.14 Of the 3300 dwellings allocated to be found within the Redditch Borough boundary, the findings of the White Young Green stage 2¹ (WYG 2) are, amongst other things, that ADRs in Redditch favour less well for development that the use of further Green Belt land within Bromsgrove District. With regard to this WYG 2 conclude that the Redditch SHLAA (October 2008) has identified sites with potential to accommodate around 1700 dwellings on brownfield land, including a windfall allowance based on brownfield completions.

To summarise:

Completions 2006-2008	690 dwgs	B/F = 608 G/F = 82	
SHLAA B/F sites	647 dwgs		
SHLAA G/F sites	316 dwgs		
SHLAA B/F & G/F mix sites	158 dwgs		
B/F windfall allowance	432 dwgs		
Total	2243 dwgs		

Table 1

¹ Study into the Future Growth Implications of Redditch Second Stage report White Young Green October 2008

6600 – 2243 = 4357 to be found in Bromsgrove and/or Stratford-on-Avon Districts.

2.15 Taking account of completions, this equates to a minimum of 72 per cent of the Redditch allocation of 6600 dwellings to be accommodated on greenfield land. Of this, 66 per cent will be on Green Belt land in neighbouring districts. Therefore, the percentage of development associated with meeting Redditch's natural growth on brownfield land will be in the region of 28 per cent. BDC and RBC question that this can be considered as an 'emphasis on development of brownfield land' and whether this is contrary to the goal of achieving urban renaissance.

2.16 Given that beyond the MUAs a high percentage of development within shire areas is likely to be on green field land and furthermore, development is also likely to involve urban extensions on a significant scale. If Local Planning Authorities are to deliver genuinely innovative sustainable development, it is essential that the WMRSS sets appropriate standards with respect to both aspirations and expectations for the environmental and sustainability expectations in new development.

2.17 **Policy SR2** repeats parts of SR1 but with different emphases making it not only duplicatory but also confusing, for example, in relation to renewable energy regeneration. Policy issues in relation to renewable energy are repeated again in policies EN1 and 2 (pages 137-139).

2.18 **Paragraph 2.27** states that design and construction should be adaptable to the changing climate conditions "*where feasible*". BDC and RBC consider that there should be stronger emphasis placed on the standards of construction materials and a requirement by house-builders to meet them. If meeting these standards reduces profit margins, then without more stringent guidance for house-builders it may result in the use of less efficient materials or cost cutting.

2.19 This policy refers to development within the "MUAs", "Settlements of Significant Development", and "other areas where development is concentrated". In order to avoid confusion it is considered that it is important to ensure a continuity of terms throughout the document. Other policies include references to, for example, "other urban areas" and "market towns" (CF2B), but it is unclear whether these terms are generic or specific.

SR3 Sustainable Design and Construction (page 25)

2.20 BDC welcomes this policy and recognises the potentially huge impact it could make but recognises that there is some repetition with policies SR1 and SR2.

2.21 Given its extensive cross-sector support, greater weight should be placed upon the West Midlands Sustainability Checklist², as it encompasses the sustainability issues from SR1C but is only briefly mentioned.

² <http://www.checklistwestmidlands.co.uk/>

2.22 The threshold is set at 10 residential units or 1,000 square metres. Policy CF10 informs us that over half of all completions are from windfall sites. Therefore, it may mean that setting the threshold at 10 residential units will result in substantial amounts of new development not being included. BDC is concerned that by setting the threshold so high, the Government target for CO2 reduction may not be achievable.

2.23 BDC and RBC both agree that this policy criterion should be strengthened. Stating “*at least*” and “*wherever possible*” as a guide to achieving acceptable standards for sustainability leaves a ‘loop hole’ for developers to avoid meeting lower carbon levels for as long as possible. Also setting “*appropriate targets*” for developments through dialogue between local planning authorities and developers is also open to miss-use and inconsistency. What developers should be providing and the timescale in which to do it so should be addressed as a standard regionally, if not nationally.

Policy SR3 Sustainable Design and Construction, Criterion (C)

2.24 BDC and Redditch Borough Council (RBC) both agree that with respect to the targets set for reducing carbon emissions in new homes up to 2016, this criterion could be more stringent. “*Considering the potential for securing higher standards*” should be expressed as a more firm requirement. In addition, 2016 is halfway through the plan period and some eight years away. Therefore, the WMRSS should be aiming to achieve zero carbon levels sooner than this date.

Policy SR3 Sustainable Design and Construction, Criterion (G)

2.25 BDC and RBC both agree that the requirement to meet or exceed level 4 for water conservation conflicts with the requirements of Policy SR3, Criterion (C). The water conservation requirements should also be aiming to achieve level 6 – preferably at the same rates set out in Policy SR3, Criterion (C), especially if Policy SR3, Criterion (C) is revised and made more stringent.

2.26 **RSS Para 2.29** states that significant investment in waste water infrastructure is likely to be needed. In the case of future development in and around Redditch Borough, this investment will be needed. Investment needs to consider remediation of existing problems as well as the provision for new infrastructure. Existing ‘hot spots’ in the sewerage system should be eliminated not exacerbated during future development. As a SSD which was not privy to Growth Point funding, BDC and RBC question where such ‘significant investment’ will come from to secure its infrastructure needs if the SSD designation remains.

2.27 Finally, it is considered that there is lack of consistency between the climate change and sustainable construction policies and other policies in the document. For example: PA1B (v) “*encourages*”, yet SR3 “*requires*”.

SR4 Improving Air Quality for Sensitive Ecosystems (page 27)

2.28 BDC welcomes guidance on this issue and notes that this work is to be developed as part of the WMRSS Phase 3 Revision.

It is suggested that to aid clarity, areas of poor air quality and the 13 sensitive European sites referred to in this policy are indicated on the Spatial Strategy Diagram.

3. THE SPATIAL STRATEGY FOR THE DEVELOPMENT OF THE WEST MIDLANDS (page 30)

3.1 **RSS Paragraph 3.3** states that *“MUAs do not have the land capacity to accommodate the necessary building without making inroads into Greenfield/Greenbelt land. Consequently... local authorities in the surrounding Shires are anticipated to provide housing beyond their own generated needs in order to meet this shortfall”*. BDC and RBC both agree that this statement is contrary to the principle of urban renaissance and compromises the objectives in the RSS.

3.2 **RSS Page 31**, this section of the WMRSS re-affirms four key challenges facing the Region, these are:

- a. Urban Renaissance
- b. Rural Renaissance
- c. Diversifying and modernising the Region’s Economy
- d. Modernising the transport infrastructure of the West Midlands

3.3 BDC endorses the above challenges but would also suggest that an additional challenge should be added which reflects the challenge faced by settlements beyond the MUAs to accommodate significant additional growth which are characterised by major urban extensions on green field land.

3.4 BDC and RBC both consider that alteration to the WMRSS Green Belt objective has invited unnecessary and compromising erosion of Green Belt land without giving adequate consideration to alternative more sustainable development options.

3.5 **RSS Paragraph 3.11** states that new development will be focussed in the SSDs without attracting investment or migration from the MUAs. BDC and RBC consider that the four newly designated SSDs, which were not previously Sub Regional Foci, will be detrimental to urban renaissance and the WMRSS objectives. BDC considers that the locations of these four newly designated SSDs are too close to the MUAs and the original SRF to complement their role in the Region. It is considered that, for example, out-migration from Birmingham to Redditch would be considered, by most people, to be an acceptable distance to move/commute. This view has also traditionally been held, e.g. in RPG.11 the central crescent was identified as an area where development should be avoided because it would risk increasing out migration/commuting levels.

3.6 **RSS Paragraph 3.7** (page 31) states that *“The Spatial Strategy can be broadly summarised as enabling all parts of the Region (not necessarily individual settlements or local authorities) to meet their own needs, in a mutually supportive and sustainable way. Protecting and enhancing the Region’s environmental assets and, where appropriate, making economic use of them, together with the prudent use of natural resources, is a core element of this and will be particularly important in guiding the nature and location of development and improvements at sub-regional and local levels”*.

3.7 BDC supports the principles expounded here but questions whether elements within the remainder of the strategy will achieve these aims, for example:

b) Rural Renaissance - supporting rural communities to achieve their economic and social potential whilst embracing the challenges of access and climate change

BDC does not consider that the level of growth allocated to the District will allow it to achieve its economic and social potential. The reasons for this are partly explained under PA6A Page 28.

3.8 Furthermore, in reference to paragraph 3.65 Bromsgrove wishes to register its objection to the designation of Redditch as a SSD on the grounds of its adverse implications for Bromsgrove as outlined later in this report.

3.9 **RSS Paragraph 3.12 (page 33)** BDC consider that sub-paragraph a) is misleading as it implies that WMRSS growth requirements can be essentially met in Settlements of Significant Development, and at other settlements peripheral development would appear to be an exception. The paragraph suggests 'some peripheral development of other settlements may need to be considered in LDDs'. There is clear evidence that implementation of the WMRSS Draft Revision will necessitate substantial green field releases in other areas.

3.10 **RSS Paragraph 3.13** states that the six Regeneration Zones and the three High Technology Corridors will provide spatial focus for economic growth and diversification. In relation to this statement, all four newly designated SSDs are located significantly outside the Regeneration Zones and three of the four newly designated SSDs are not in the vicinity of the High Technology Corridors. BDC and RBC question the designation of the additional four SSDs (including Redditch) as their locations within the Region in relation to the Regeneration Zones and High Technology Corridors do not appear to contribute towards the WMRSS spatial focus of 'economic growth and diversification'.

3.11 **RSS Paragraph 3.14** states that "*the delivery of the necessary supporting infrastructure, by a variety of agencies is critical to the realisation of the RSS.*" With respect to large scale greenfield development in and around Redditch, The Joint Study into the Future Growth Implications of Redditch Town to 2026 (White, Young, Green, 2007) states that "*any development in or around Redditch may be significantly constrained by Severn Trent Water's feasibility, design and build programmes for the delivery of new assets. Severn Trent will not programme this work before their 2010-2015 capital investment period.*" This gives cause for concern and BDC and RBC raise the question of whether the necessary infrastructure will be in place to deliver specific allocations by the end of the Plan period. BDC and RBC also question whether this type of funding programme may also have serious implications with respect to delivery of the RSS, elsewhere in the Region.

3.12 **RSS Paragraph 3.61** acknowledges that in the past, Redditch has been a centre used to accommodate 'overspill' from the conurbation and stresses that the RSS has adopted a change in policy direction, whereby migration from

the MUAs will be limited to 'overspill' locations. Para 3.62 specifies that 'overspill' will now be focussed in the SSDs, of which Redditch is one. BDC and RBC do not consider that a 'change in policy direction' has been adopted with respect to this point. It is considered that limiting migration to SSDs (or overspill locations) is likely to attract out-migration from the MUAs. Paragraphs 3.61 and 3.62 contradict each other and undermine the principle of urban renaissance. Redditch Borough has not been considered as an overspill location for conurbation related growth since its designation as a New Town in the 1960s. County Structure Plan housing targets for Redditch Borough since 1986 have been to accommodate natural growth only.

3.13 RSS Paragraph 3.63 and pages 40-45 The original sub regional foci settlements are still referred to as New Growth Points in the Draft Preferred Option document . None of the additional four SSDs (previously 'other large settlements) have been referred to as NGPs. They are merely referred to as centres which will meet the housing and employment needs of the area, rather than accommodating development beyond natural growth.

3.14 BDC and RBC consider that only meeting Redditch's own natural growth should not constitute a designation of SSD and would seek to have this designation removed through the Examination in Public (EiP) process. BDC and RBC are most concerned that this imposed designation will result in Redditch being allocated a significantly higher housing target following the publication of the NLP report into higher housing provision for the West Midlands Region.

Spatial Strategy Objectives

3.15 The spatial strategy objectives for the WMRSS includes the following statements (Page 32):

to retain the green belt but to allow an adjustment to boundaries where exceptional circumstances can be demonstrated to support urban regeneration or to allow for the most sustainable form of development to deliver the sub regional implications of the strategy.

to ensure the quality of the environment is conserved and enhanced across all parts of the region

However, the Preferred Option document does not provide any specific or additional guidance with respect to the future general extent of the West Midlands Green Belt.

3.16 Without any formal green belt review at a strategic level BDC is concerned that the Phase 3 Partial Review of the WMRSS will not focus enough on the coverage of the green belt, and simply focus on policies that apply to the current green belt. It is also stressed that changes to the green belt through the RSS should be given increased importance in the Phase 2 element, in order to give earlier clarity to green belt local planning authorities who are attempting to progress core strategies.

3.17 Furthermore, as mentioned in PPG2 (paragraph 2.9) that "*Wherever practicable a Green Belt should be several miles wide, so as to ensure an*

appreciable open zone all round the built-up area concerned. Boundaries should be clearly defined which will help to ensure the future agricultural, recreational and amenity value of Green Belt land.” The expansion of Redditch into the surrounding Green Belt land will not only result in merging of the urban area with surrounding smaller settlements, it could also reduce its strategic gap to Bromsgrove to only 4km (2.5miles) and to Birmingham to only 6.2 km (3.8 miles). Moreover, without defensible boundaries it will be difficult to ensure that the possible re-defined Green Belt boundaries will be able to ‘check the unrestricted sprawl of urban areas’.

3.18 The WYG 2 study favours locating all of the proposed Redditch growth to the north of Redditch in the area known as Bordesley Park. It is considered that this would result in an incongruous boundary to the Redditch urban area, with resultant development projecting out considerably into the countryside, with no apparent defensible boundary. Additionally the Arrow Valley green corridor runs through Redditch, effectively bisecting its urban area on an approximate north/south axis. If Redditch growth results in development of land to the north of Redditch, this would result in this green corridor being abruptly severed. Consequently, if development is pursued in this location, not only will it result in an ill conceived and awkward built form but the ‘broken’ green corridor is also likely to have an adverse impact on biodiversity and this point is further expanded upon under policy QE4.

The Spatial Strategy Diagram (page 48)

3.19 Bromsgrove is defined as an “Other Large Settlement” in the Spatial Strategy Diagram. The WMRSS does not explain this classification in terms of role and function. BDC would welcome explanation of this categorisation as this is not clear within the document.

4 RURAL RENAISSANCE

Policy RR1 Rural Renaissance (Page 60)

4.1 Policy RR1 states” *It is important that activities to improve the quality of life in the rural areas protect and enhance their unique qualities including their environmental assets.”*

and furthermore

RR1 B states that *policy priorities will vary according to a number of factors including the quality of the environment, local character and distinctiveness, need for new employment, need for additional housing, including affordable housing to meet local needs, and stem population decline and access to services and facilities.*

RR1 C I states that *with regards to rural areas which are subject to strong influences from the MUA’s and which are relatively prosperous and have generally good access to services, the main priority will be to manage the rate and nature of further development to that required to meet local needs whilst ensuring that local character is protected and enhanced.*

4.2 It is acknowledged that the allocation of 6600 dwellings (Policy CF3) dwellings to Redditch together with associated employment land cannot be accommodated within its administrative boundary. Therefore Bromsgrove and/or Stratford upon Avon have been identified as locations where this additional growth should be accommodated. It is considered that this is contradictory. By meeting the needs of Redditch within Bromsgrove's boundaries adjacent to Redditch this is not meeting Bromsgrove's needs and is certainly not ensuring the local character of Bromsgrove is protected and enhanced.

4.3 Furthermore, by stipulating that this development must be adjacent to Redditch this immediately puts Green Belt land under threat. Bromsgrove is 91% Green Belt and therefore the Green Belt comprises the inherent character of the district. Moreover, the Green Belt land to the north of Redditch, where the recent White Young Green study recommends development should be sited, performs a strategic function of preventing the coalescence of Redditch and Birmingham and clearly this relatively narrow gap would come under threat of further erosion as explained above.

5 COMMUNITIES FOR THE FUTURE

5.1 **Paragraph 6.2** Page 62 states *“Excessive development on greenfield sites outside the MUAs could fundamentally undermine the process of urban renaissance.”* BDC and RBC consider this statement should be reconsidered especially with respect to the designation of a SSD for Redditch Borough and the fact that 72% of its Preferred Option allocation will have to be accommodated on greenfield sites (66% on Green Belt land). BDC and RBC are of the opinion that 72% greenfield development to meet Redditch's local needs is, without doubt, 'excessive'. BDC and RBC acknowledge that the Preferred Option allocation is only to meet its natural growth needs, however, BDC and RBC consider that the designation of a SSD can only exacerbate the undermining of urban renaissance in the future.

5.2 **Para 6.12 – Housing within the Major Urban Areas (MUA's)** BDC and RBC consider Paragraph 6.12 to contradict Paragraph 3.61. Paragraph 6.12 states that the *“Spatial Strategy assumes that net out-migration (from the MUAs) can be stemmed.”* If this is the case, why does Paragraph 3.61 state that migration will be limited to overspill locations? Clarification on this issue would be welcomed.

Policy CF2 Housing Beyond Major Urban Areas (page 73) and CF3 Level and Distribution of New Housing Development (page 74)

5.3 WMRSS states that beyond the MUA's, strategic housing development should be concentrated in and adjacent to towns which are capable of balanced and sustainable growth without significant harm to local communities and in sustainable locations. These are the Settlements of Significant Development (SSD) and as abovementioned it is proposed that Redditch should be designated as an SSD.

5.4 The draft housing target for Redditch Borough (within and beyond its administrative boundary) is 6600 dwellings. 3300 of which are to be found in

Bromsgrove and/or Stratford-upon-Avon districts, all of which would be on Green Belt land. Such a large allocation of greenfield development on the edge of Redditch would not contribute towards stemming the outward movement of people and jobs away from the MUAs. Given the likely proximity of development north of Redditch (WYG report, 2007), the 'gap' to the conurbation would be reduced and would continue the trend of increasing pressures on the environment, encouraging development on greenfield sites and increasing the need for car-based travel as commuters would continue to travel into the conurbation. This would be to the detriment of the Region's key challenges to alleviate these issues.

5.5 In order to address the cross boundary issues raised in the WMRSS Bromsgrove District, Redditch Borough Council and Stratford upon Avon District Councils have been working together during the preparation of their respective core strategies. This demonstrates the commitment of the three authorities to jointly and strategically address the proposed Redditch growth issue in the WMRSS and role of Redditch Town as a Settlement of Significant Development.

5.6 In order to support the preparation of the WMRSS, Worcestershire County Council, Redditch Borough, and Bromsgrove and Stratford District Councils commissioned consultants White Young Green to undertake a 'Joint Study into the Future Growth of Redditch Town to 2026'. This study was completed in December 2007 and forms a key part of the evidence base for the RSS. However, there was general agreement between the authorities concerned that the Joint Study was insufficiently detailed, to allow district level splits of Redditch Borough-related growth to be identified. It was therefore agreed that additional work needed to be done to augment the broad study findings.

5.7 White Young Green were subsequently commissioned to undertake this work on behalf of the West Midlands Regional Assembly, Worcestershire County Council, Redditch Borough, and Bromsgrove and Stratford District Councils. This study into the Future Growth Implications of Redditch by White Young Green concluded that of the 6600 dwellings allocated to Redditch (Policy CF3) only 2250 can be accommodated within its boundaries.

5.8 In terms of harm to local communities the study also identified that all of the housing growth and the majority of employment growth should be in the Bromsgrove District, apart from a small amount of employment growth which could be located in Stratford District. Since the RSS stipulates that this growth should be adjacent to the boundary of Redditch, it is impossible to imagine how the growth of 4350 new homes cannot harm local communities in terms of coalescence of settlements, additional traffic movements, disturbance, loss of amenity/quality of life, loss of accessibility to the countryside, further degradation of air quality and so on. Furthermore, the land take alone of this scale of development equates to in excess of 300 hectares of green field/greenbelt land.

5.9 BDC consider that the WMRSS should be absolutely clear by stating that development associated Policy CF2, at Redditch can not be implemented without the provision of the essential infrastructure. For example, Redditch

Borough Council considers that its town centre may struggle to meet the levels of provision required by its natural growth in population. If Redditch Borough is allocated additional housing in excess of its natural growth, by virtue of its designation as a SSD, it will fail to meet these criteria.

5.10 In further joint working arrangements between the 3 authorities in relation to Redditch growth issue, opportunities and mechanisms for funding such as the Community Infrastructure Levy are being jointly explored and developed. Work has progressed with technical stakeholders on the preparation of respective core strategies and this work together with the evidence base has identified initial infrastructure requirements. Whilst investment will need to be built into programmes of infrastructure providers, significant additional investment will also be required. Further detailed work is still required to identify all constraints and infrastructure needs.

5.11 **RSS Paragraph 6.26** sets out several factors that local authorities should take into account when developing LDDs and responding to planning applications, including sustainable drainage systems. It should also make it explicit that it will be essential that the distribution of development must take account of both watercourse floodplains and, particularly in the light of the impact of climate change, areas liable to flash flooding, and of the need for and importance of, the preparation of strategic flood risk assessments to assist the decision making process in relation to the appropriate distribution of development within the sub-regions.

5.12 It should be noted here that Bordesley Park, the area identified by White Young Green in their stage 2 report as the optimum area for the proposed Redditch growth, is affected by flooding with 2 fluvial flood plains dissecting this land. The implication of this, particularly in terms of the, as yet, unquantified impact of climate change and its potential required mitigation measures, for example, through the use of Sustainable Drainage Systems, may have further adverse impacts in terms of total eventual land take and warrants additional detailed investigation work.

5.13 BDC and RBC consider that footnote (e) to Policy CF3 should provide a more precise breakdown regarding the distribution of new housing to meet Redditch Borough's natural growth needs within Bromsgrove and/or Stratford-on-Avon Districts.

5.14 There are a number of key issues within the District that were first identified in the Bromsgrove Sustainable Community Strategy (SCS), which will be addressed within the emerging Core Strategy. The SCS contains a high level action plan for housing and in particular recognises the need for greater levels of affordable housing in the district. The Core Strategy is the main delivery mechanism for addressing the affordable housing needs of the District. One of main aims of the Core Strategy is to ensure the housing needs of the District are met, including increased provision for our ageing population. Within the Core Strategy there is a focus on regenerating the town centre and an AAP is already being delivered to facilitate this regeneration. Providing a new train station that will provide better links with the town and surrounding area has also progressed to an advanced stage. It is crucial that the Core Strategy helps to expand the employment base within the District. Many people commute out of

the District on a daily basis for work and this is clearly not sustainable. It is imperative that the Core Strategy helps to deliver a range of jobs for the local population. Bromsgrove is characterised by a number of small settlements and the Core Strategy will help to maintain the vitality and viability of such settlements.

5.15 This provides a brief overview of some of the main issues that the Council will seek to address through its emerging Core Strategy, however there is a concern that achievement of these objectives may be undermined due to policies contained within the emerging RSS. Policy CF3 allocates 2100 dwellings for the district of Bromsgrove to meet its own housing needs over the period from 2006-2026. This low allocation in turn significantly hampers the Council's ability to accord with policies CF7 and CF8 as affordable housing targets would not be met and there would be insufficient housing to deliver balanced mixed communities.

5.16 The low level of growth identified within Policy CF3 also hampers the District's ability to accord with a number of policies within the Prosperity for All chapter including policies PA1, PA3, PA6, PA12B, PA14 and PA15. Modest levels of housing development may restrict economic growth within the District with people being forced to look outside the District to meet their own housing needs. This could in turn limit development at Bromsgrove Technology Park and other employment sites throughout the District and restrict the redevelopment of the town centre. Whilst low levels of growth may also limit the vitality and viability of local centres leading to the closure of essential services.

5.17 It is therefore clear that Bromsgrove District Council has strong and wide ranging concerns over the allocation of just 2100 homes in the plan period from 2006-2026. Firstly it is important to put the 2100 figure into context. In first 2 years of the plan period (06/07 & 07/08) 411 homes have been delivered. On top of this there are 347 commitments (at 1st April 2008), of which 125 are under construction. If all of these commitments were to come forward this would leave 1342 dwellings for the remainder of the plan period.

5.18 The Taylor Review (2008) emphasises the substantial housing growth that is occurring in market towns, which can be applied to Bromsgrove as it would need a significant increase in its housing stock to accommodate growth. The 2008 Bromsgrove District Housing Market Assessment examines UK National Statistics (2004) that projects population and household change for Bromsgrove District from 2006 to 2026. In 2006, there was an estimated 91,600 people and 37,000 households, an implied average of 2.5 people per household. The area's population is expected to increase steadily by 6 per cent to 2016 and 11 per cent by 2026. The key problem identified from these statistics, is that household growth will exceed population growth and, compared to a 2006 baseline, the number of households is projected to increase by 14 per cent to 2016 and 22 per cent by 2026. It is expected, in accordance with national trends, which average household size will fall from 2.5 in 2006 to 2.3 by 2016. The 2008 Housing Market Assessment therefore concludes, the total number of households in the District is projected to increase by 8,000 between 2006 and 2026, a trend which implies a strong locally generated growth in the need and demand for housing.

5.19 The evidence document for the RSS Phase 2 Revision entitled 'Communities for the Future: Housing Background Paper' also identifies the same level of household growth. This figure is exceptionally higher than the RSS allocation of 2,100 and if not taken into account would result in a severe undersupply of housing. Research conducted by Bromsgrove District Council has promoted the District's strength in accommodating extra growth by illustrating potential sustainable housing sites; a topic that will be discussed in more detail under the 'availability of suitable land' section of the Council's response.

5.20 The Taylor Review (2008) also acknowledges a discrepancy between planned new homes and projected growth in rural areas. Analysis of emerging Regional Spatial Strategies indicates that nationally planned housing numbers are lower than household growth projections, with this disparity between supply and demand considerably higher in rural areas. DCLG analysis indicates planned housing provision in emerging RSS amounts to only 91 per cent of projected household growth, but for rural areas the differences are exceptionally larger, where planned housing provision is just 81 per cent of projected household growth. The disparity between planned provision and future housing growth is extremely poignant within the West Midlands. The RSS Phase 2 Revision states a provision for 365,000 dwellings by 2026, yet 2004 projections suggested 382,000 new homes are required to accommodate current need. This issue has been further intensified by the NHPAU report (2008) which recommends between 415,000 and 455,500 homes should be provided in relation to future housing growth. These figures would suggest that the current WMRSS housing provision is prospectively 80 per cent of projected household growth, which would be amplified in rural districts such as Bromsgrove.

5.21 The Taylor Review (2008) also identifies housing allocations in RSSs are being prioritised towards urban development in key service areas at the expense of wider rural areas, in part as a result of emphasis on purely environmental sustainability criteria rather than broader social and economic concerns in rural areas. This concept was also supported by research conducted by Three Dragons (2007) in a report for the Commission of Rural Communities. This issue is a concern for Bromsgrove as it is a predominantly rural district, and rural projections forecast that demand for housing will continue to rise substantially faster than supply, which increases competition for housing, pushes up prices and squeezes out people who cannot afford larger mortgages. Therefore, the proposed allocation of 2,100 dwellings will be insufficient to impact on housing affordability.

5.22 The Strategic Housing Market Assessment (SHMA) stressed that the current moratorium and two thirds reduction of new approvals will increase prices and also increase the number of households unable to compete in the market place. Bromsgrove is also one of the top three highest priced LHMA's in the South Housing Market Area. The District Level Housing Market Assessment (2008) also acknowledges that younger people in Bromsgrove have a strong aspiration to buy a home. Yet, the ability to do so is severely constrained by high property prices and affordability, which forces them to move elsewhere. This Housing Market Assessment further supports the reality of demand for housing exceeding supply by conditioning a projected 8,000 increase in households by 2026.

5.23 As the majority of Bromsgrove is rural in nature, housing affordability is expected to get worse, as development is further distorted towards defined urban areas, whilst the need for housing in Bromsgrove continues to grow. The Draft Core Strategy addresses the issue of affordability through its affordable housing policy, proposing all new developments to have a target of 40% affordable dwellings. As the District is predominantly rural, this policy also acknowledges that affordable housing will be required in or on the edge of settlements in the Green Belt where a proven local need has been established. The Rural Renaissance policy also intends to promote affordability issues in the rural areas by suggesting suitable locations for development in regard to the proven local need. Through these policies Bromsgrove aims on meeting the demand for affordable housing provision, and as a result provides a suitable basis for increased housing allocations.

5.24 From the detailed analysis of sites within the SHLAA a total allocation of up to 4000 units would be more appropriate for the district of Bromsgrove. This would better enable Bromsgrove to meet its own identified needs. It would enable the imbalance in the local housing market to be addressed by providing greater numbers of 2 and 3 bed properties and provide a greater level of affordable housing for identified local needs. The housing market is stronger than in many surrounding districts, ensuring that additional housing is viable and deliverable. In line with PSS3, sites have been identified that are suitable, available and achievable for housing development. There would be significant economic benefits for the district with additional housing being a catalyst for the expansion of employment sites and the regeneration of the Town Centre. Additional housing in Bromsgrove targeted at the identified needs would help the RSS achieve its main objectives of urban renaissance and rural regeneration through delivering a level of housing that only meets local needs in Bromsgrove District whilst not hampering the regeneration of the MUA.

CF4 Phasing of New Development (page 78)

5.25 BDC generally agrees that the objective of ensuring that the phasing of housing development is such that it supports the regeneration of the MUAs and brings forward development on sustainable previously developed sites in advance of green field development. Although BDC would suggest Policy CF4 as currently drafted does not provide adequate guidance for the development of appropriate phasing proposals in Core Strategies at the sub-regional level.

It states that:

Levels of new house building across the Region will be phased to seek to ensure that there is, overall, an increasing level of housing provision in the period up to 2016.

This policy fails to take into consideration external pressures which may hamper delivery of this policy such as the downturn in the construction industry and the 'credit crunch'.

And furthermore it states:

In sustainable locations, sites which are on previously developed land should be phased early in the plan period and, in most circumstances, prior to the phasing of Greenfield sites.

5.26 As mentioned above this policy fails to acknowledge the potential difficulties in bringing forward development on previously developed land in a timely fashion in terms of land assembly, potential land contamination issues which can substantially delay delivery.

And further:

The development of any greenbelt sites should generally be phased late in the plan period and after further investigation as to whether they constitute the most sustainable form of development in the local area and represent exceptional circumstances.

Paragraph 6.35 of the revision fails to recognise that phasing will be driven by a wide range of infrastructure considerations not just water provision which will all need to be carefully considered to ensure that the focus where possible is on brownfield delivery.

Policy CF5: The Re-use of land and buildings for housing (page 80)

5.27 BDC broadly supports the inclusion of Policy CF5 which reflects national policy. However, it should be recognised that the implications of the Draft Revision for areas such as Bromsgrove (given SHLAA information and work on the Draft Core Strategy) is that achievement of the 60% Previously Developed Land requirement for Bromsgrove is an aspiration which in practical terms is undeliverable.

CF7 Delivering Affordable Housing (page 82)

5.28 PPS3 and the RSS Policy CF7 require Local Planning Authorities to ensure that provision of affordable housing meets the needs of both current and future occupiers. Affordable housing is one of the most critical issues in the district, so much so that housing is identified as one of Council's four main priorities in the Bromsgrove Council Plan 2008-2011. The Council intends to address the issue of affordable housing through Core Policy 16 in the Draft Core Strategy. This is another policy that would be difficult to satisfy with current allocations when analysing future population patterns.

5.29 The RSS Spatial Options paper shows the effect of projecting past trends and has shown that from 2001 to 2026 Bromsgrove will need an additional 3,269 homes in regards to population growth, and a further 4,963 in regards to increases in migration to the District. This report calculated a total of 8,232 would be needed by 2026 to provide adequate housing levels, which is considerably greater than the current allocation. However, the RSS spatial options realise this is an unrealistic target and states a new aim of 7,200, which is also someway off the 2,100 allocation. The new RSS proposals which state a reduction in households needed are particularly reliant on the SHMA reducing its migration levels from 2,400 per annum over 25 years to 1,700.

5.30 There is a concern that Bromsgrove's housing allocation is low because of the high levels of housing delivered against previous structure plan targets and the current over-supply in relation to the adopted RSS. However, a large proportion of the homes delivered in the last 10 years are large 3, 4 and 5 bedroom properties that led to high levels of in-migration from the MUA. There has been a shift in planning policy since then, meaning that areas outside the MUA such as Bromsgrove should only be catering for identified local needs. These recently built large properties do not cater for large sections of the local population, hence the requirement for an increased allocation to build more smaller properties to cater for young adults and the elderly.

5.31 In recent years Bromsgrove District Council has invested heavily in identifying the level of need for affordable housing across the district. Firstly a Housing Needs Study was completed in 2004, followed by a Strategic Housing Market Assessment in 2007 and most recently a Housing Market Assessment in 2008.

5.32 Each of these studies was carried out using slightly different methodologies, meaning the results differ slightly. It is widely recognised that such studies are not an exact science due to the wide ranging variables and possible sources of information. However, the most important details to come out of each study is that there is a significant need for affordable housing across the district.

5.33 The 2004 Housing Needs Study estimated the need for affordable housing based on the 'Basic Needs Assessment Model' (BNAM). The BNAM sets out 18 stages of analysis to produce an estimate of the annual requirement for additional affordable housing. There are 2 main analytical stages that result in a gross affordable housing requirement these are: backlog of existing need and newly arising need. The outcome of the study was that there was in 2004 a gross affordable housing requirement of around 247 units per annum across the district, if you exclude all in-migration. The current allocation of 2,100 would result in an annual rate of 105 dwellings, which would be less than half the required amount identified to meet affordable housing needs as part of the Housing Needs Survey.

5.34 The 2007 Strategic Housing Market Assessment (SHMA) for the South Housing Market Area identified a gross annual need for 597 affordable units. Taking into consideration annual supply from re-lets and annual new supply there was an annual shortfall of 286 units. This was significantly higher than other Worcestershire districts, with the exception of Worcester City. The recent Housing Market Assessment also identified a significant need for affordable housing throughout the district. An annual target of 105 dwellings over the plan period means that the level of unmet need will continue to increase and therefore hamper the delivery of policies within the Draft Core Strategy.

5.35 The majority of affordable housing that comes forward through the plan period will be financed by the private sector through S106 agreements. In conjunction with the recent Housing Market Assessment, consultants carried out detailed financial modelling to calculate a level of affordable housing that would generally be viable for the private sector across a wide range of sites. The model took into consideration a variety of factors including construction

costs, land values, rental costs, re-sale value whilst also allowing for gross profits for the developers of 15%. The modelling work concluded that a realistic target of 40% affordable housing should be set for housing developments. If this is implemented against proposed RSS targets it is likely that no more 42 affordable units per annum would come forward.

5.36 A fundamental element in the Council's justification for additional housing provision is the high levels of affordable housing need identified in policy CF7 in the Revision Phase Two of the WMRSS. The Taylor Review (2008) recognises the restrictive nature of planning practices and a shortfall in the planned provision of affordable homes are having on rural villages and hamlets, often creating unsustainable communities, unaffordable for those who work there, losing jobs and services. The Council identifies how important it is to create sustainable communities (Core Policy 17) throughout the District; in the Draft Core Strategy, however, such a policy will be become increasingly difficult to deliver. To ensure settlements in the District maintain their vitality and viability it is clear that a larger housing allocation is required.

5.37 Whilst the Council accepts that it may not be able to fully meet its affordable housing needs, the enormity of the affordable housing shortfall further highlights the need for an addition to the RSS allocation. With an increase in numbers, general housing provision will also be able to reach the scale where affordable housing contributions can become more effective. The Council feels it cannot meet both its regeneration and affordable housing targets with a housing allocation that is heavily based on past trends.

5.38 During the period between 2001 and 2005, only 3.6% of Bromsgrove's new completions were affordable housing (compared with 11.2% in the total SHMA). That is merely 74 out of 2,057, which is significantly lower than the rest of the SHMA and the rest of the region. The current Regional Housing Strategy (RHS) states that Bromsgrove needs to sustain a balanced continuity with South West Birmingham markets by sustaining a range of choices. However, the same strategy gives priority to other towns in the region for development (Worcester, Warwick, Stratford and Redditch). Bromsgrove's Draft Core Strategy includes a policy regarding affordable housing whereby the District aims to deliver higher levels of affordable housing than previously, and will encourage a minimum target of 40 per cent affordable housing provision on all developments.

5.39 The neighbouring South West Birmingham area is looking to diversify significantly the current tenure mix in favour of owner occupation and full market housing, which may create a disparity between expectation and delivery (Bromsgrove Housing Market Assessment, 2008). Coupled with the small allocation of 2,100 for Bromsgrove's needs, the planned changes in tenure profile for South West Birmingham could adversely exacerbate the shortfall of affordable housing in Bromsgrove. This issue could potentially be avoided or at least minimized by greater provision being allocated. The RHS makes the following statement:

"It is important therefore that in future Bromsgrove achieves a balanced continuity with the conurbation housing markets by sustaining that range of housing choices throughout its own housing market."

However, there will be very limited opportunity to meet this requirement with such a modest allocation that will increase levels of unmet need and leave the housing market in a state of imbalance.

5.40 It is acknowledged that great increases in house building will not significantly reduce average house prices, particularly in a district that is distorted by large detached properties in areas such as Barnt Green. Glen Bramley carried out detailed studies on the impact on housing supply on house prices on 90 districts across England in his 1995 publication entitled 'Planning, The Market and Private Housebuilding'. The study showed "*that the elasticity of supply of new private housing in Britain is quite low, although far from negligible*". This study shows that whilst there are links between housing supply and house prices, a significant increase in supply would not result in a significant increase in the number of people being able to afford their own home. Simulation carried out within the study show that "*doubling one district's plan provision will raise output by an average of 9%, which will lower the districts house prices by 0.5%*". Bromsgrove's request for increased housing provision is based on the fact it would enable Bromsgrove to meet identified needs for affordable housing and smaller accommodation rather than merely expecting average house prices to fall due to increased supply.

CF 8 Delivering Mixed Communities (page 85)

5.41 As stated in Strategic Housing Market Assessment (SHMA) for the South Housing Market Area of the West Midlands (2007) Bromsgrove has one of the highest rates of growth in both terms of population and household numbers. In line with national trends, it is well established that a combination of the formation of more independent and single person households, the impact of relationship breakdown and the ageing of the population have resulted in household growth outstripping population growth. Although Bromsgrove's population is also increasing due to augmented net inward migration from the MUA and other parts of the country, arguably one of the biggest factors is the reduction in average household size. There has been a rapid growth in one-person households, which often occurs in older age groups; which adversely reduces the rate of supply from household dissolution caused by death, as people live longer and more independently.

5.42 2004-based ONS population projections identify, the older populations of Bromsgrove are particularly experiencing growth. Between 2006 and 2026 those aged 60-74 will increase by 26.5 per cent, those between 75 and 84 by 64.9 per cent, and a dramatic increase of 95.3 per cent for those above the age of 85. This extremely large population growth will see a rise in people over the age of 60, the age when incomes are likely to fall and housing and care needs begin to change. In 2006 there were approximately 22,600 people above the age of 60, which is predicted to rise to 32,300 in 2026 (an increase of 43 per cent). When compared to the Worcestershire County figures, Bromsgrove remains consistent, as over the same time frame (2006-2026) the County's population over the age of 60 will increase by 47 per cent, from 131,800 to 193,500. The neighbouring District of Redditch will also see a dramatic increase in its elderly population. In terms of quantity it will not be higher than Bromsgrove; however, the population of the age of 60 will increase by 64 per

cent, from 14,700 in 2006 to 24,100 in 2026. In contrast, the adjoining local authority of Birmingham will only experience a 15 per cent increase in its population over age of 60, from 178,900 in 2006 to 205,500 in 2026. These statistics illustrate the issue of the growing elderly population in Bromsgrove and as result will lead to more one-person households, thus increasing the demand for housing as a reduction in supply occurs.

5.43 The recent Housing Market Assessment (2008) identified that housing development should focus primarily on 2 and 3 bedroom properties, this was then emphasised within Core Policy 12 Type, Size and Tenure of Housing of the Draft Core Strategy. This would provide options for the elderly who no longer need a large family home to downsize and also give young adults the opportunity to take their first steps on the housing ladder. Providing these smaller homes would help to redress the balance in Bromsgrove's housing market where there is currently an over-supply of large family homes.

5.44 PPS3 and Policy CF8 of the RSS require Local Planning Authorities to plan for a mix of housing on the basis of different types of households that are likely to require housing over the plan period. This should have regard to current and future demographic trends; a policy that will be extremely difficult to deliver in Bromsgrove with such a modest allocation. As the population is increasing and more importantly the number of households, Bromsgrove will be unable to cater for the expected 8,000 additional households that are needed from 2006 to 2026.

5.45 In addition to the identified need there is also a hidden need. These are the people that are difficult to monitor in housing assessments as they do not place themselves on waiting lists. High house prices mean that it is not possible for the majority of young adults to purchase properties at full market value; therefore they either have to stay in the family home or move outside of the district, generally to the MUA where housing is generally more affordable. For example the average resale price of a two bedroom property is £120,000 meaning that a single person would require an income in excess of £30,000, this is significantly above the average workplace or residence based earnings in the District. If properties are not delivered for young people they will continue to leave the District, and the District will not create balanced mixed communities, thereby accentuating the rise in the average age of the population.

5.44 If the Council is not in a position where it can deliver higher levels of affordable housing to meet identified local needs, and more young people are forced to leave the District, then there are possible severe economic consequences. The regeneration of the town centre could be affected with a declining active population making the town less attractive to investors and large retailers. It is already clear from a recent survey undertaken as apart of the Town Centre Area Action Plan that over two-thirds of the population regularly shop outside of the District (the main destinations are primarily Redditch, Birmingham and Merry Hill). If this continues to happen the remaining non-food retailers may choose to leave the town centre.

5.45 There would also be consequences for local centres. If suitable housing is not provided in smaller settlements then the vitality and viability of the centres

could be severely compromised. This could lead to the closure of essential local services such as post offices and public houses. This could mean some of the remaining people become isolated and excluded from society. Naturally for those with private transport it would lead to longer and more frequent car journeys. This would result in the failure in the delivery of sustainable development one of the overarching aims of both the Core Strategy and the RSS.

5.46 There are also important consequences for local employment that need to be considered. If the working population declines further it will become increasingly difficult to diversify and expand the employment base in the District. In particular the Central Technology Belt that is supported by RSS Policy PA3; if there are only a limited number of young, skilled workers available locally, Bromsgrove Technology Park may struggle to develop further high technology industries.

5.47 The Strategic Housing Market Assessment (SHMA) highlights the fact that work place income is radically lower than residence based income. This is a particular concern for Bromsgrove as a large proportion of its residents travel to work in nearby urban areas, such as Birmingham, Redditch and Worcester. This can create issues associated with sustainability as more people travelling would in turn impact on carbon emissions, climate change and air quality. Bromsgrove's Core Policy1 Climate Change within the Core Strategy promotes development in sustainable locations, near well served public transport, which could be promoted by an increase in provision, as this would better facilitate development that can reduce energy consumption. The issue of work place income compared with residence based income has significant impacts on house prices, meaning people who work inside the District would be at a disadvantage when competing for homes with those working outside the District. This provides further evidence that local people may be forced to move out of the District to find a new home.

CF 10 Managing Housing Land Supply (page 86)

5.48 PSS3 Housing recognises that all housing sites identified should be both deliverable and developable. It is therefore reasonable to suggest that housing should be located in areas where the market is strong and demand is high. Between July and September 2006 the Strategic Housing Market Assessment for the South Housing Market Area identified that the average house price in the district of Bromsgrove was £240,867. This is one of the highest average prices across the South Housing Market Area with the average house price across the whole West Midlands region just £173,778. In the adjacent borough of Redditch over the same period in 2006 the average house price was lower still at £160,397. Whilst in the current climate, house prices today maybe a little different, the comparative price differences still exist.

5.49 The higher prices in Bromsgrove primarily exist because property in the District is in high demand. The District has many desirable characteristics for its residents including the attractive rural environment, safe communities and good transport links with the Major Urban Area (MUA). The desirability of the District has been emphasised by a net inward migration of 4,700 people between 2001 and 2006 (Housing Market Assessment, 2008). Whilst this trend of outward

migration from the MUA is not desirable it does emphasise that people want to live in the District. Furthermore, the Nathaniel Lichfield Study entitled Development Options for the West Midlands in response to the NHPAU Report suggests that for Birmingham to fulfil its role as a world city, the surrounding districts need to provide more good quality housing and that restricting supply in areas outside the city, which are clearly within Birmingham's housing market, harms the city's ability to grow to its desired potential. As previously stated, The Communities for the Future Housing Background Paper projects that the number of households will rise from 37,000 in 2006 to 45,000 in 2026. Crucially, the majority of this growth is primarily based around an increase in single person households within the district rather than inward migration. It is therefore reasonable to assume that there is a need within the district for more than 2100 homes between 2006 and 2026.

5.50 The strength of the local housing market is emphasised by the high number of completions in the district in recent years. Over the 7 years since the beginning of the RSS plan period in 2001 there have been 2831 completions. This is an average of 404 per annum. The District experienced a high level of windfall development and had no policy mechanism to control this and therefore a Managing Housing Supply SPG was introduced in July 2003 to prevent the level of housing over-supply increasing further. The District therefore has a proven track record demonstrating its ability to deliver higher levels of housing.

5.51 Whilst it is clear that there is a need for more than 2100 homes, it is crucial to consider whether there is enough land available to deliver an increased level of housing over the plan period. Such a low level of housing would be insufficient to rebalance the housing market and would not fully cater for the changing household structures in the District.

5.52 Bromsgrove District Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) in accordance with the DCLG practice guidance. The assessment gave all interested parties the opportunity to submit sites that may have potential for housing for the remaining 18 years of the plan period to 2026. To provide realistic estimates of capacity, sites have been discounted to take account of the associated infrastructure required. On sites under 2 hectares the capacity is based on 85 per cent of the land, whilst on larger sites over 2 hectares in size the percentage has been reduced to 65. Small sites below 0.4 hectares in size have not been discounted.

5.53 In most cases to provide a range of the deliverable capacity of sites we have provided a minimum and maximum figure based on the characteristics and location of the site. In some instances developers have provided indicative site layout drawings enabling a precise figure to be provided.

5.54 As Bromsgrove has a severe lack of affordable housing we have included only sites that have potential to deliver some affordable housing in accordance with the policy contained within the Draft Core Strategy.

Source	Capacity (min and max)	
Completions (06-08)	411	411
Commitments	347	347
Brownfield sites	344	373
ADR sites	2754	3136
Total	3856	4267

Table 2: Total Amount of Housing Deliverable

5.55 Within the Bromsgrove District Local Plan ADRs were identified that had potential to deliver additional growth. These sites have been tested at a local inquiry and are considered to be sustainable locations to deliver growth. It is envisaged that the majority of future growth could be delivered on ADRs.

5.56 The ADRs are located primarily around the largest settlement in the district, Bromsgrove Town. All of the settlements with ADRs have a wide range of services and essential facilities available to cater for the local population. These are the most sustainable locations within the District that have excellent bus and rail links to the MUA. This will improve further in the future with a new train station in Bromsgrove Town providing a high quality transport interchange linking the new station with the town centre and the wider Worcestershire region. The provision of additional housing around Bromsgrove may stimulate development within the town centre and boost the process of regeneration that is being delivered through an Area Action Plan. This regeneration would meet the needs of the local population and be in accordance with RSS Policy PA12B.

5.57 A number of meetings have been held with key stakeholders in the district to discuss the potential implications of building homes on the ADRs. These include meetings with health and education providers, statutory undertakers, the Highways Agency and emergency services such as the police. The outcomes of these meeting were positive and no 'showstoppers' were identified to delivering increased levels of growth within the district.

5.58 One of the unique characteristics of Bromsgrove is the fact that 91% of the district is located within the Green Belt. The use of the ADRs means that Green Belt boundaries would not need to change and the strategic gap between Birmingham and Redditch would be retained whilst protecting the attractive rural landscapes of the district.

5.59 Table 2 identifies that there has been sufficient land identified to deliver between 3856 and 4267 dwellings over the plan period from 2006-2026. As 2 years of the plan period have already been completed it was deemed crucial to include all completions during those 2 years and all existing commitments. There is potential for a further 150 homes to be delivered through the expansion of the Norton Farm site. Naturally this would lead to the alteration of Green Belt boundaries but there is potential for significant planning gain. It has been proposed that a relief road would be built from the roundabout at the Western End of Barnsley Hall Road that runs through the former Barnsley Hall Hospital site and Norton Farm to join Birmingham Road /A38. This proposal could be linked with another new road which would be routed through the Perryfields road ADRs. It has been identified that these two schemes would significantly reduce the amount of through traffic in Bromsgrove Town Centre, an area that is currently heavily congested. The remainder of the Barnsley Hall Hospital site

would be turned into a country park that would provide significant benefits for the local population by providing opportunities for outdoor recreation.

5.60 In addition it is also highly likely that windfall sites would come forward for development through the plan period that have yet to be identified. In particular the regeneration of the town centre is likely to lead to a number of small schemes coming forward. To put this in context since 2001 a total of 1778 dwellings have been granted planning permission for windfall development, this is an average of 254 per annum. This figure would be significantly higher if the housing moratorium had not been introduced in 2003.

5.61 A significant number of Green Belt sites were considered within the SHLAA. The sites in the most sustainable and least strategically sensitive locations could deliver in excess of a further 2000 homes if required in the later end of the plan period.

5.62 Bearing in mind the capacities mentioned, the desire to retain Green Belt boundaries and the importance of meeting only local needs we believe that an allocation of up to 4,000 homes would be more appropriate for the district of Bromsgrove. This would give the authority the opportunity to begin to redress the imbalance in the housing market and deliver a higher number of affordable units for identified local needs.

6 PROSPERITY FOR ALL

PA1 Prosperity For All (Page 91)

6.1 BDC supports the broad principles set out in this policy. However, BDC and RBC assume that Criterion C i) of Policy PA1 is suggesting meeting the economic needs of the MUAs beyond the MUAs in SSDs. If this assumption is correct, this in effect means 'economic overspill' for SSDs in much the same way as 'housing overspill' (Paragraphs 3.61 and 3.62 in relation to residential growth). If this is so, BDC and RBC are most concerned that this will place further pressure on the sensitive Green Belt areas around Redditch Borough and may add to the long term implications for Bromsgrove.

6.2 BDC fully supports the inclusions new sub paragraph C (ii) which promotes the location of employment outside the MUA's, where it can help create more sustainable communities by generally providing a better balance between new housing and new employment and limit out commuting. However, it is suggested that the reference to meeting 'at least one' of the criteria in Section C should be deleted as it would be more appropriate to consider performance against the full range of criterion.

6.3 However, in relation to policy wording in sub paragraph D) *Any development proposed on the edge of the MUA's or other Greenfield sites should meet the following criteria;*

The development respects the natural environment, built environment and historic heritage in accordance with policies QE 1-9

BDC considers that that this principle has not been applied to the Redditch growth scenario; that it should not be restricted to only employment growth but should also be applied to housing growth, and that it should be strictly adhered

to in relation to future growth arising for example from the findings of the NLP study.

PA3 High Technology Corridors (Page 93)

6.4 BDC welcomes and supports this policy. Given that policy PA3 (criteria B) advocates:

In land-use terms, new developments within the HTCs should be focused on the MUAs and at specific nodes shown on the Prosperity for All Diagram.

Bromsgrove is identified as one such node but the significance of this seems to have been overlooked.

6.5 An increase in housing provision in the district would undoubtedly require an increased level of employment development. The 2008 Employment Land Review identifies, for example, that a further 4,000 dwellings will generate an additional requirement for 2 hectares of construction industry related land and an estimated extra 2 hectares of land for office use. Additional housing growth would support development on the Central Technology Belt, in particular at the Bromsgrove Technology Park, providing local jobs for local people. This would help the delivery of RSS Policy PA3 'High Technology Corridors'. Providing high quality housing for identified needs in Bromsgrove may encourage further investment in the Technology Park leading to a wider range of high technology firms investing in the local area. Additional housing development would also be a catalyst for development at other employment sites such as Harris and Saxon Business parks.

PA6 A Employment Land Provision (page 96) goes on to state that:

ii) the need to ensure that employment opportunities are accessible to areas of significant new housing development

iii) the strategic priority given to Regeneration Zones and High Technology Corridors in meeting employment needs within the Region

6.6 BDC consider that insufficient emphasis has been placed on the significance of Bromsgrove's position within the HTC. Redditch is not located within the HTC. On the grounds of sustainability, a balance needs to be struck between employment and housing provision. If new development is focussed on the HTC in Bromsgrove this should be balanced with an equivalent and proportionate allocation of accessible new housing. Therefore, on the above grounds there is a potential inherent conflict in the case of Bromsgrove and this justifies an increased housing allocation for the District.

Moreover criteria iv states:

the potential for the maximum use of recycled land for employment purposes to meet these needs but to recognise that the use of some Greenfield land may be required where all other alternatives have been considered.

6.7 BDC consider that more emphasis should be placed on the final remark that *all other alternatives* must be considered i.e. land within Bromsgrove

District in sustainable locations within or adjacent to the existing settlements rather than Greenfield locations adjacent to the boundary of Redditch.

6.8 RSS Policy PA6A sets an indicative long-term requirement of 21 hectares of Employment for the district. Council's 2008 Employment Land Availability document identifies that there are 29.8 hectares of employment land commitments. The majority of these commitments are at Bromsgrove Technology Park, Buntsford Gate Business Park, Wythall Green Business Park and Saxon and Harris Business Park. The majority of these sites are within, or within easy reach of, Bromsgrove Town where the majority of housing growth would be located. In addition a further 7.89 hectares of employment land could be allocated on the remaining part of Perryfields ADR BROM 5B (the other half of BROM5B has been used in the housing calculations).

6.9 It is clear that additional housing growth could be a catalyst for development at existing business parks in the district and potentially reduce the numbers of people commuting to the MUA for work on a daily balance. There is sufficient capacity on existing employment sites and potentially on part of the Perryfields Road ADR to cater for an increase in housing without altering Green Belt boundaries.

PA6 B Protection of Employment Land and Premises (page 100)

6.10 BDC welcomes the continued inclusion of Policy PA6B which seeks to protect employment land from alternative uses. The objectives of Policy PA6B are closely incorporated into Policy CP8 Distribution of New Employment Development in Bromsgrove's Draft Core Strategy. It should be noted that this policy places greater emphasis on proposals for alternative use of employment sites having to demonstrate that the site or premises are no longer viable for employment or mixed use, has been actively marketed for employment uses, accompanied by full and detailed evidence, there would be net improvement in amenity and the proposal would not have an unacceptable adverse impact upon the quality and quantity of employment land within the local area.

PA12B Non-Strategic Centres (page 113)

6.11 BDC fully supports the introduction of this policy and recognises the important role Bromsgrove Town Centre has in the lives of local people. An Area Action Plan is being developed for the Town Centre to regenerate and enhance its function and role. However, BDC consider that the regeneration would be compromised by the low housing allocation for the district as identified within Policy CF3. Such a low level of housing would mean that the needs of local residents would not be met; resulting in people being forced to leave the district. If the economically active section of the population leave the district it could stifle the local economy and act as a deterrent for major retailers and other developers to invest in the Town Centre. This could lead to the creation of a town centre that does not fully meet the day-to-day retail needs of the local population. It is essential that the regeneration of the town centre is not impeded, otherwise even greater numbers of local people will choose to shop outside the district in locations such as Birmingham and Redditch.

PA14 Economic Development and the Rural Economy (page 118)

Criteria A states:

Development plans and other strategies should support the sustainable diversification and development of the rural economy through the growth of existing businesses and the creation of new enterprise. This should be undertaken in ways that meet local employment needs, maintain viable and Sustainable local communities, conserve and enhance environmental assets and respect local character and distinctiveness.

and PA15 Agriculture and Farm Diversification (page 119) states:

Development plans and other strategies should recognise the continuing importance of the agricultural sector in the Region. Development plans should include positive policies to promote agriculture and farm diversification through the development of innovative business schemes including sustainable tourism, environmentally sustainable farming, forestry (QE8) and land management, new and innovative crops, on-farm processing adding value to existing production and the promotion of local marketing and supply chains. Any development should be appropriate in scale and nature to the environment and character of the locality.

6.12 BDC considers that adequate consideration has not been given to the implications of Redditch growth on the agricultural economy and the significance of the potential loss of 300 hectares of agricultural land.

7 QUALITY OF THE ENVIRONMENT

QE1 Conserving and Enhancing the Environment (page 123)

7.1 Sub paragraph iv) states that local authorities and other agencies in their plans, policies and proposals should:

protect and enhance the distinctive character of different parts of the Region as recognised by the natural and character areas (Figure 6) and associated local landscape character assessments, and through historic landscape characterisation.

BDC welcomes and supports the principles set out in this policy

QE3 Creating a high quality built environment for all

7.2 BDC welcomes and supports the principles set out in this policy, and in particular paragraph B i), as we consider the concept of local distinctiveness as very important in preserving the local character of the District.

QE4 Greenery, Urban Greenspace and Public Spaces(page 125).

7.3 BDC welcomes and supports the principles set out in this policy. However, if Redditch growth results in development of land to the north of Redditch, this could result in the green corridor of Arrow Valley being abruptly severed. Furthermore, as the land to the north of Redditch is of unknown biodiversity value status, this will require additional examination potentially as part of the WMRSS Phase 3 Revision. Worcestershire County Council also concur in their response to the WMRSS that *“the area surrounding Redditch*

contains a considerable old grassland resource that is of unknown biodiversity status and requires further investigation”.

QE 5 Protection and Enhancement of the Historic Environment (Page 127)

Criteria B recognises:

Of particular historic significance to the West Midlands are:

i) the historic rural landscapes and their settlement patterns

7.5 BDC welcomes and strongly supports the principles set out in this policy, and notably the recognition in Part B of the historic significance of market towns (Bii) and (B v) the historic transport network.

7.6 **RSS Paragraph 8.21 c** BDC is concerned that the Government has not recognised the costs of providing adequate resources to carry out this policy, and especially the extra workload that will fall on local authorities following the implementation of the Heritage Protection Review. In particular the shortage of professionally qualified staff requires to be addressed.

QE6 The Conservation, Enhancement and Restoration of the Regions Landscape

7.7 BDC welcome and support this policy but is concerned that substantial tracts of its landscape will be adversely affected due to the implications of proposals for Redditch growth within the Districts Green Belt.

7.8 In PPS7, the Government recognises and accepts that there are areas of landscape outside nationally designated areas that are particularly highly valued locally and by utilising tools such as landscape character assessment (LCA), sufficient protection for these areas should be given without the need for rigid local designations. The proposed Redditch growth would potentially result in the loss of Areas of Great Landscape Value, Landscape Protection Areas (as identified within the current Bromsgrove District Local Plan) or land adjacent to these areas, thereby potentially affecting their setting. The likely impact on the AGLV or LPA is however difficult to assess as these concepts have been superseded by the use of LCA. LCA is an objective tool for differentiating and classifying landscapes which recognises that each landscape type has equal merit in contributing to local distinctiveness and sense of place. As the majority of the Worcestershire landscape falls in the medium-high sensitivity category, there will certainly be a measurable negative impact on landscape character arising from development proposals. Although this landscape can be found elsewhere in Worcestershire, it is attractive and has high amenity value to residents and visitors. It should therefore be protected against development as development of this size is unlikely to be reversible in the future.

QE9 The Water Environment A vii

7.9 BDC welcomes and supports this policy. *Development and Flood Risk* (page 135)

Paragraph 8.42 refers to PPG25 Development and Flood Risk. It is assumed that this is a typing error as PPS25 was released on 7th December 2006 12 months before the RSS revision was submitted.

EN1 Energy Generation and 2 Energy Conservation (page 137)

7.10 BDC considers that these policies appear to duplicate/overlap with Policies SR1 and 2. However BDC strongly supports all efforts to promote the use and development of renewable energy. With regards to iii), it is essential that any such developments in the proximity of the assets listed are considered very carefully as the possibility of a negative impact is high. Although such developments are not impossible as demonstrated by a number of National Trust schemes.

Part 3 Minerals policies (page 139)

Minerals are dealt with at County level and therefore BDC and RBC consider it appropriate to endorse the submission made by Worcestershire County Council to the WMRSS Phase Two Revision - Draft Preferred Option consultation regarding these matters.

The relevant extracts from the Worcestershire County Council Cabinet endorsed report and its accompanying appendices are as follows:

WCC Cabinet Report

“Chapter Eight : Quality of the Environment

In overall terms the Waste Strategy set out in the draft revision is supported, notwithstanding the comments below and the recommendations for policy wording changes identified in Appendix 2. Waste is an important issue in the emerging LAA and the Local Government family will need to work closely together to address concerns about waste issues, (especially in relation to municipal waste). In this respect the Waste Strategy within the draft revision represents a good starting point.

The Revision sets targets for the minimum capacity of the total facilities needed to process both municipal waste and commercial and industrial waste over the life of the RSS, for the maximum amounts of waste which should be landfilled and the dates (at 5 yearly intervals) by which they should be met. A calculation of the “Treatment Gap” between what capacity currently exists and would be needed is included. These targets are useful indications of the direction of travel but officers will be updating the data for municipal waste in the review of the Joint Municipal Waste Management Strategy and anticipate that more capacity may be needed to manage municipal waste in order to meet Landfill Allowance Trading Scheme (LATS) targets. The Treatment Gap will be considered through the preparation of the Waste Core Strategy.

It is accepted that in managing waste facilities there will be a need for a pattern of sites and areas suitable for new or enhanced waste facilities to be identified and that it is appropriate for such facilities to be in close proximity to

Settlements of Significant Development or the other large settlements identified within the draft revision, namely Worcester, Bromsgrove, Droitwich, Kidderminster and Redditch. However, the wording of Policy W3 is currently unacceptable to the Council insofar as it implies that provision of facilities for the management of waste should be made in **all** of those locations. This is a decision more appropriately left to the Waste Core Strategy and a change to the policy wording should be sought.

The draft revision sets out that in considering the provision of waste management facilities to allocate specific waste streams or technologies to particular locations would stifle opportunity for innovation in managing the waste resource and therefore sites which are identified in LDDs should be capable of accommodating a variety of technologies and size of facility. This approach to waste management provision is strongly supported.

Additionally, the draft revision sets out that there is no evidence base to support the allocation of facilities to manage particular waste streams or apply particular technologies to any broad location and that by being too rigid and specific in allocating specific technologies to sites the WMRSS could have an adverse effect on the introduction of new development in resource management, innovation and enterprise. This stance and approach to strategy within the WMRSS is again strongly supported.”

Appendix 1

“Chapter 8 : Quality of the Environment

Within the Quality of the Environment Chapter, a range of new policies in relation to Waste Management provision have been introduced. These policies identify the need to manage waste from all sources including commercial and industrial; construction and demolition, agricultural activities as well as municipal waste. In addition, new policies have identified the broad locations for waste management facilities and the amount of provision to be made by each Waste Planning Authority over the duration of the WMRSS. The key elements of the draft revision as they impact upon Worcestershire are set out below.

(i) Waste Strategy

When it is approved by the Secretary of State the revised WMRSS will become the Regional Waste Strategy for the West Midlands. The WMRSS proposes to deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as a last option. The waste strategy provides a framework in which communities take more responsibility for their own waste by seeking to be self-sufficient on a “net” basis within the region and by requiring each Waste Planning Authority to manage an equivalent tonnage of waste arising within its boundary. To this end Policy W1 of the revision requires each Waste Planning Authority to allocate enough land in its LDDs to manage the equivalent tonnage of waste to that arising from all waste streams within its boundary taking into account the waste hierarchy.

(ii) Targets for Waste Management in the Region

Based on a series of background studies the revised WMRSS provides a distribution of waste tonnage requiring management; a pattern of waste management facilities of national, regional or sub regional significance; and

identifies the tonnages of waste requiring management for both the commercial and industrial and the municipal waste sectors. The revision apportions these tonnages by Waste Planning Authority area. The revision adopts national targets to indicate the “direction of travel” to minimise waste production and to provide new facilities to reprocess and manage waste in the West Midlands. The revision takes into account the proposed housing figures set out in the WMRSS to help calculate municipal waste targets and a higher level of commercial and industrial waste being managed higher up the waste hierarchy than that set out in the national waste strategy in order to establish targets for the region. Table 7 below sets out the proposed targets for Worcestershire, which are in 5-year bands. Policy W2 requires each Waste Planning Authority, through LDDs, to plan for a minimum provision of new facilities to reprocess and manage waste in accordance with the tonnages.

Table 7
Minimum Waste Diversion for Municipal Waste and Commercial and Industrial Waste for Worcestershire (tonnes)
 [Extract from Tables 5 and 6, Draft Revision – page 149]

	2005/06		2010/11		2015/16		2020/21		2025/26	
	Min Diversion from Landfill	Max Landfill	Min Diversion from Landfill	Max Landfill	Min Diversion from Landfill	Max Landfill	Min Diversion from Landfill	Max Landfill	Min Diversion from Landfill	Max Landfill
Municipal Waste	78,000	234,000	160,000	181,000	212,000	143,000	242,000	127,000	254,000	130,000
Commercial & Industrial Waste	441,000	320,000	503,000	271,000	627,000	268,000	858,000	286,000	858,000	286,000

(iii) The Need for Waste Management Facilities by Sub Region

The RPB has considered the need for additional waste management capacity of regional and sub-regional significance and the need to reflect any requirements for waste management facilities identified nationally. The revision does not set out that there is a need to make provision for facilities to meet a national need. However it does identify that there are a number of authorities where a significant shortfall in facilities to manage an equivalent tonnage of waste to that arising in their areas currently exists (see Table 8 below).

Table 8
Gap Analysis by Waste Planning Authority
 [Draft Revision, page 151][million tonnes]

Projection Option - C&I High –MSW 3	Treatment Capacity Required	Projected Throughput + Quantified Expansion	Treatment Gap
Birmingham	1.81	1.27	0.54
Coventry	0.62	0.36	0.26

Shropshire	0.61	0.45	0.15
Staffordshire & Stoke-on-Trent	2.39	1.13	1.25
Borough of Telford & Wrekin	0.54	0.05	0.49
Warwickshire	1.04	0.45	0.60
Worcestershire	1.22	0.31	0.91

Policy W3 of the revision requires those authorities which have a “treatment gap” in facilities to manage waste to make provision in their LDDs for a pattern of sites and areas suitable for new or enhanced waste management facilities in, or in close proximity to, the MUAs, Settlements of Significant Development and other large settlements identified on the “Broad Locations for Waste Management Facilities” Diagram. Within Worcestershire this includes Worcester, Bromsgrove, Droitwich, Kidderminster and Redditch. It is considered that in addition to meeting local needs that these locations are well placed to accommodate facilities of a regional and or sub-regional scale to reprocess, reuse, recycle or recover value from waste, allowing for the requirements of different technologies.

The revision sets out that to allocate specific waste streams or technologies to particular locations would stifle the opportunity for innovation in managing waste as a resource. As such the sites identified in LDDs should be capable of accommodating a variety of technologies and size of facility.

(iv) Criteria for the Location of Waste Management Facilities

Given the need for a major investment programme in new waste management facilities the revision sets out that it is equally important to safeguard the sites of existing waste management facilities (taking into account environmental and amenity considerations) (Policy W4). The revision also sets out in Policy W5 the criteria to be considered by Waste Planning Authorities when identifying additional sites to meet capacity needs.

The revision also acknowledges that the management of waste in rural areas can pose particular problems due to the dispersed nature of settlements. Policy W6 accordingly requires all Waste Planning Authorities outside of the MUAs to identify sites for the treatment and management of waste arising from areas of low population and scattered communities. Quite often the need to locate facilities away from “sensitive receptors” requires facilities to be located in open countryside and sometimes within the Green Belt if the facilities are required to be close to or serve the MUAs or major settlements. Policy W7 sets out the criteria for when such facilities could be permitted.

(v) Hazardous Waste

The West Midlands region, although traditionally a more industrialised region than elsewhere, does not proportionately generate more hazardous waste than elsewhere. Since the redefinition of hazardous waste the amounts arising from construction and demolition projects has reduced significantly and more contaminated soil is being treated “in situ” rather than being landfilled. The redevelopment of brownfield sites in the region will produce some waste which cannot be recycled because of its hazardous nature and it will need to be

treated at specialist sites. There are currently two regionally significant facilities reprocessing hazardous waste already located in the Black Country and on the basis of current information they are well placed to manage the region's hazardous waste and could be expanded if required.

Policy W8 of the revision sets out policy in terms of safeguarding existing sites for the treatment and management of hazardous waste. However, all LDDs are required to give specific priority to identifying new sites for facilities to store, treat and recycle soils and construction and demolition waste, including through maximising "on site" recycling and the promotion of "urban quarries".

Concerning the need for new landfill facilities the revision considers that, depending upon the success in diverting waste from landfill, no additional landfill is necessary until between 2016-2022. The revision does not propose to require individual Waste Planning Authorities to identify any new landfill sites within LDDs. Policy W11 requires that LDDs should restrict the granting of planning permission for new sites for landfill unless it is for proposals required to meet specific local circumstances or necessary to restore deposited or degraded land (including mineral workings)."

Appendix 2

Chapter 8: Quality of the Environment

Policy W2

Concerns in relation to the accuracy of the tonnages of waste to be managed are covered in the main report. It is considered that more work will be needed to be undertaken to check and update the data contained in tables 5 and 6 of the draft revision document in relation to both municipal waste and commercial and industrial waste. Once this has been completed the resultant "treatment gap" set out in table 7 may need to be reconsidered. At the same time it will be important for the RSS to make clear which figures are to be used as guidelines when preparing detailed Waste Core Strategies - tonnages or the "treatment gap".

Policy W3

Concerns in relation to the wording of the policy in relation to identifying a pattern of sites for the provision of waste management facilities are set out in the main report."

TRANSPORT AND ACCESSIBILITY (Page 163)

As Transport and Accessibility has many functions at a County-level, BDC and RBC consider it appropriate to endorse the submission made by Worcestershire County Council to the WMRSS Phase Two Revision - Draft Preferred Option consultation regarding these matters as follows:

The relevant extracts from the Worcestershire County Council Cabinet endorsed report and its accompanying appendices are as follows:

Cabinet Report

"Chapter Nine : Transport and Accessibility

The revised policies within the Transport and Accessibility chapter of the WMRSS focus on measures to improve accessibility and mobility and the

promotion of sustainable transport. These aims are very much supported and the policy framework within the draft revision provides a good strategic context for detailed approaches to park and ride, parking standards and demand management to be taken forward at the local level. That said there are clearly wider transportation and accessibility issues in relation to infrastructure (which have been addressed earlier in the report) and which will ultimately need to be reflected within Policy T12 (Priorities for Investment) and within the overall implementation plan.”

Appendix 1

“Chapter 9 : Transport and Accessibility

Revisions to the Transport and Accessibility Chapter have focussed on four of the Regional Transport Strategy (RTS) policies – Strategic Park and Ride, Car Parking Standards, Demand Management and Airports. In addition, Policy T12, Transport Priorities for Investment, has been updated to reflect factual changes and the spatial and infrastructure implications emerging from new policies within the Communities for the Future and Prosperity for All Chapters.

(i) Strategic Park and Ride

Providing people with sustainable travel alternatives is central to the RTS and Park and Ride can provide an attractive alternative to the car particularly where the journey is to a centre. The revision sets out that with continued growth in rail usage there is a need to improve and expand the region’s existing park and ride sites and to provide new opportunities across the network. The majority of existing park and ride facilities within the region are on the rail network, however there are an increasing number of bus-based sites providing a local service.

Policy T6 sets out that locations for strategic park and ride should be considered against the criteria of congestion benefits; frequency, capacity and quality of the public transport offer; environmental, design and traffic impact; potential for interchange with other public transport services; and implications for the wider public transport network. The policy includes the already identified strategic location of Worcester Parkway, but also identifies potential additional locations within the region, including Bromsgrove.

(ii) Parking Standards

The WMRSS revision for car parking policy is only in relation to maximum standards for new development. This is covered by parts A and B of Policy T7. These sections set out that authorities should work together on a sub-regional basis to develop maximum standards for car parking associated with new developments which will support sustainable economic growth whilst minimising the demand for travel by car and reduce congestion. The policy also sets out that in developing car parking standards local authorities should consider the need for more restricted standards within the congested areas as part of a sustainable strategy to manage travel demand; should assess the need to make the most effective use of available land; should maintain and enhance the economic viability of town and city centres; and should take care to avoid deterring investment in town and city centres.

(iii) Demand Management

The revision sets out that the demand for travel is such that it will not be possible to meet it in full, even with increased investment in infrastructure. The

current WMRSS contains a policy (T8) on demand management. This has been amended by the revision, primarily in relation to Part C of the policy. This sets out that whilst being encouraged to bring forward local charging schemes in the more congested areas, when doing so local authorities should take into account the impacts on the environment (including sustainability and climate change); the economy (local and regional); community (residents and businesses); urban and rural renaissance; and capacity (pressure on other parts of the network including roads and public transport).

(iv) Airports

Policy T11 of the revision sets out the roles of Birmingham International Airport (BIA), Coventry Airport and Wolverhampton Business Airport. It sets out that BIA will continue to be developed at the region's principal passenger airport and is expected to accommodate future growth to serve more distant international destinations. This will require an extension of the main runway and associated facilities and, beyond the period of the WMRSS, may require a second shorter runway. The policy requires BIA to achieve a minimum modal share by public transport (passengers, employees and visitors) of 25% by 2012 and 30% by 2020.

The further development of Coventry and Wolverhampton Business Airports in the region should be in accordance with Air Transport White Paper and should complement the role of BIA as the region's principal passenger airport."

Appendix 2

"Chapter 9 : Transport and Accessibility

Paragraph 9.36

Should the proposed wording changes to location descriptions in the Spatial Diagram be taken forward there will be a need for consistency within the transport chapter.

Paragraph 9.72

Should the wording of the text under the first bullet point be reconsidered? Park and Ride schemes should relieve pressure on congested areas. However taken literally the text, which currently suggests developing sites '*adjacent to congested sections of the motorway network*' could lead to increased congestion by initially increasing road borne traffic. Would wording indicating that Park and Rides Schemes should be developed in locations '*suitable to help reduce congestion on the congested sections of the motorway network....*' be better?

Policy T6

It is assumed that all the locations set out in part (C) of the policy as potential Park and Ride locations have been brought forward via the application of the criteria set out in part (A) of the policy? It is also unclear whether there is any priority in order (from a regional need perspective) as to when to bring them on stream? These points could be clarified within the supporting text to the policy."

8 Bromsgrove District Councils comments in relation to

T5 Public Transport and T6 Strategic Park and Ride (page 177)

8.1 BDC supports the above policies and in particular the potential location of a Strategic Park and Ride in Bromsgrove. This will reinforce the function of the proposed new railway station as a pivotal rail focus for North Worcestershire.

8.2 BDC does not consider that Bromsgrove's potential for new growth in terms of its key strategic position on the PRN i.e. at the intersection of the M42 and M5 on the "motorway box" and its designation as a node in the Central Technology Belt is fully acknowledged within the WMRSS. Therefore the full economic potential of the District is unlikely to be realized, contrary to the aims of the Spatial Strategy for the Development of the West Midlands as outlined above.

Policy T6 (page 180)

8.3 It is assumed that all the locations set out in part (C) of the policy as potential Park and Ride locations have been brought forward via the application of the criteria set out in part (A) of the policy? It is also unclear whether there is any priority in order (from a regional need perspective) as to when to bring them on stream? These points could be clarified within the supporting text to the policy.

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BROMSGROVE DISTRICT COUNCIL

CABINET

3RD DECEMBER 2008

BROMSGROVE DISTRICT COUNCIL RESPONSE TO THE NATHANIEL LICHFIELD PARTNERSHIP ADDITIONAL HOUSING GROWTH STUDY

Responsible Portfolio Holder	Cllr Jill Dyer
Responsible Head of Service	Dave Hammond
Non-Key Decision	

1. SUMMARY

- 1.1 The report below highlights Bromsgrove District Councils response to the study prepared by Nathaniel Lichfield and Partners (NLP) commissioned by the Government Office for the West Midlands (GOWM). This was in response to concerns expressed by Baroness Andrews, that the submitted preferred option Regional Spatial Strategy (RSS) review did not deliver the required amounts of housing as reported by the National Housing and Planning Advice Unit (NHPAU).

2. RECOMMENDATION

- 2.1 That the attached report (appendix 1) is submitted as Bromsgrove District Councils formal response to the NLP Study.

3. BACKGROUND

- 3.1 Following the formal submission of the West Midlands RSS, the West Midlands Regional Assembly received a letter from Baroness Andrews, Parliamentary Under-Secretary of State in the Department for Communities and Local Government. In her letter, dated 7th January 2008, the Minister expressed concern about the housing proposals put forward by the Assembly in light of the Government's agenda to increase housing building across the country. In view of this, the Minister asked the Government Office for the West Midlands to commission further work to look at options which could deliver higher housing numbers, this work would then be considered as part of the Examination in Public on the phase 2 revision of the RSS. The commissioning and completion of the additional work has caused a significant delay in the process with the consultation period extended to the 8th December 2008 in order for this work to be completed and for stakeholder to be able to express their views on it alongside responses to the RSS. Consultants Nathaniel Lichfield Partnership has now completed this further work, and appendix 1 attached to this report is the councils response to this study.

- 3.2 Members of the Local Development Framework Working Party have already been briefed on the content of the Study and associated report is attached as appendix 2.

The findings of the study are wide ranging and varied and have different impacts on Bromsgrove District. The study identifies three potential growth scenarios which if taken forward could deliver higher levels of housing growth across the region. These three scenarios have been outlined below

3.3 Scenario 1 - South East Focus

This scenario focuses growth in the South East corner of the region, and with some provision in the rural west, which identified scope for some 51,500 additional dwellings (an extra 2,575 per annum), providing a total of 417,100 dwellings by 2026. The ratio of provision between MUAs and non-MUAs as a whole, would move from 46:54 to 47:53. Provision would be focused on parts of the region, with some of the greatest levels of unmet need and affordability, with principal increases in the south and central C1 Housing Market Areas. This option would involve a new settlement in Solihull. This scenario would see growth arguably supporting parts of the region where economic growth is potentially being hampered by a lack of housing. This scenario indicates an additional 5,000 dwellings in Bromsgrove, although NLP recommend they are provided through urban extensions to south Birmingham (2500 units) and Redditch (2500 units).

3.4 Scenario 2 - Spreading Growth

This scenario, delivering circa 54,000 additional dwellings (419,600 in total and an extra 2,700 pa) makes provision in the south east of the region where economic growth is strongest (although less than in the previous scenario). This also includes growth in North Staffordshire, Telford and Wrekin, and East Staffordshire, where there is additional capacity for development, and with appropriate phasing, funding and delivery mechanisms to support delivery. This spreads the development and market risk across a wider area. The ratio of MUA to non-MUA for housing distribution would be 47:53, with the focus of growth in both the south east and in part of the north of the region, with identified capacity and/or scope for additional growth, supporting affordability; economic and regeneration objectives. Again this scenario indicates an additional 5,000 dwellings in Bromsgrove, although NLP recommend they are provided through urban extensions to south Birmingham (2500 units) and Redditch (2500 units).

3.5 Scenario 3 - Maximising Growth

This potential scenario, which delivers 80,000 additional dwellings (445,600 in total and 4,000 extra per annum), makes higher levels of provision across a range of locations in the region. This includes in and around the southern side of the Metropolitan MUA, in Telford and Wrekin, North Staffordshire, East Staffordshire, and Stafford, alongside rural housing provision in the west of the Region. It is undoubtedly the case that this higher level of provision, whilst not necessarily unachievable, provided sufficient available and developable land is released, would be a higher risk, given the level of

build rates required. The ratio of MUA to non-MUA for housing distribution would be 46:54, with significant levels of growth in the key locations identified in the preceding scenarios, focusing on affordability, economic, regeneration and additional capacity opportunities. This scenario indicates an additional 7,500 dwellings in Bromsgrove, although NLP recommend they are provided through urban extensions to south Birmingham (5000 units) and Redditch (2500 units).

3.6 in addition to presenting these 3 growth scenarios NLP also made other findings which informed the content of the 3 scenarios above; these findings have been used as a basis for responding to the RSS and have been reproduced below

- i. There is scope to identify additional land for housing in the region;
- ii. Additional housing need not harm achievement of Urban Renaissance;
- iii. There is no evidence that increased housing supply outside the Major Urban Areas (MUAs) will reduce housing supply within them;
- iv. There is no evidence that increasing housing supply outside the MUAs increases out-migration;
- v. There may be limits on how far it is possible to increase housing supply with the MUAs;
- vi in some locations there are increased risks that additional supply could harm fragile markets and undermine housing market renewal, but could be overcome by careful phasing;
- vii Additional housing can support economic growth;
- viii. Birmingham needs more good quality housing in the City and its immediate hinterland to support its global role;
- ix. Additional housing growth can help address genuine affordability problems and meet housing needs;
- x. Additional housing growth can support rural renaissance and support RSS objectives through regeneration;
- xi. Additional housing growth is likely to require the review of Green Belt but this is consistent with RSS objectives if it results in sustainable development and regeneration. There are also opportunities to increase coverage of Green Belt;
- xii. New settlements are a potential form of development that could meet requirements in the right locations and if the delivery capability is put in place;

xiii. Transport issues are not a fundamental barrier to delivering more housing although investment in public transport alongside highway improvements will be needed in some locations;

xiv. Although there are localised hydrology and other issues to resolve there is no evidence that these cannot be addressed through investment in additional capacity or consideration of specific locations in Core Strategies;

xv. The market downturn means the currently envisaged trajectory of housing will change but there is no fundamental market barrier to increasing supply provided there is sufficient suitable and available land;

xvi. The phased release of land needs to focus on managing the risks for fragile markets, whilst also ensuring that supply increases as quickly as possible out of the downturn.

3.7 Where necessary specific comments have been prepared in relation to these findings, and the potential impacts on Bromsgrove District. Further general comments have also been included on specific elements of the NLP study where Bromsgrove is considered, these comments can all be viewed in the full response in appendix 1.

3.8 **Status of the NLP Study**

It is stressed the study is *“intended to provide a transparent and objective analysis of a series of options for delivering additional housing”* the GOWM will be using the report as a basis for their formal response to the RSS revision. NLP also make it clear that the results of their study are not formal policy or proposals of Government, but purely independent evidence which sets alternative choices for how the region ***might*** deliver additional housing to inform the Examination in Public on the Phase 2 RSS revision.

The response of the GOWM is unknown and whether or not they endorse or reject the findings of NLP is unlikely to be known until after the 8th December deadline for comments. It is important for members to be aware this study is a piece of evidence and does replace or supersede any of the policies in the RSS preferred option.

4. **FINANCIAL IMPLICATIONS**

4.1 None

5. **LEGAL IMPLICATIONS**

5.1 None

6. **COUNCIL OBJECTIVES**

- 6.1 The implications of the NLP study should they been included in the adopted RSS could have significant effects on the ability of the Council to deliver its housing and regeneration priorities, although the full extent will not be known until the process is complete. Representations and participation in the Examination in Public could influence the final RSS to include policy elements which better meet the needs of the district than those currently being proposed.

7. RISK MANAGEMENT

- 7.1 The main risks associated with the details included in this report are:

- Inability to influence the RSS to such an extent that, proposals in the adopted RSS effect the ability of the District Council to prepare Spatial Planning Documents which adequately address the identified needs, and opportunities the district possesses.

- 7.2 These risks are being managed as follows:

Risk Register: Planning and Environment

Key Objective Ref No: 6

Key Objective: Effective, efficient, and legally compliant Strategic planning Service

- 7.3 The District Council as the local planning authority has to prepare a development plan in the form of the Development Plan Documents (DPD) contained in the Local Development Framework. The planning system requires that all DPDs are in general conformity with those documents which are at a higher level in the cascade of planning policy. The highest level of policy being national Planning Policy Guidance and Planning Policy statements. The RSS is the plan which guides development across the whole of the West Midlands region, and as such the policies in the Bromsgrove District Core Strategy have to be in general conformity with those in the RSS. The weight afforded to the suggestions of the NLP in the process of finalising the revised RSS could have significant impacts on the district although currently unknown. The process of formally responding to both the NLP study and the Phase 2 revision increases the ability of the District to influence the final outcome.

8. CUSTOMER IMPLICATIONS

- 8.1 None

9. EQUALITIES AND DIVERSITY IMPLICATIONS

- 9.1 None

10. VALUE FOR MONEY IMPLICATIONS

10.1 None

11. OTHER IMPLICATIONS

Procurement Issues	None
Personnel Implications	None
Governance/Performance Management	None
Community Safety including Section 17 of Crime and Disorder Act 1998	None
Policy	The outcome of the RSS review will effect the content of future planning policies in the district
Environmental	The environmental implications of providing significant levels of new housing, potentially on green field sites are difficult to quantify at the moment although they will have to be fully considered through preparation of the various LDF documents.

12. OTHERS CONSULTED ON THE REPORT

Portfolio Holder	Yes
Chief Executive	Yes
Executive Director - Partnerships and Projects	Yes
Executive Director - Services	Yes
Assistant Chief Executive	Yes
Head of Service	Yes
Head of Financial Services	Yes
Head of Legal, Equalities & Democratic Services	Yes
Head of Organisational Development & HR	No
Corporate Procurement Team	No

13. WARDS AFFECTED

All Wards are potentially affected by the RSS

14. APPENDICES

14.1 Appendix 1

Bromsgrove District Council's formal response to the Nathaniel Lichfield and Partners (NLP) Report into Development of Options for the West Midlands RSS in Response to the NHPAU

14.2 Appendix 2

Summary of study prepared by Nathaniel Lichfield and Partners - Development of Options for the West Midlands Regional Spatial Strategy in Response to the National Housing and Planning Advice Unit report.

Officer Report to the Local Development Framework Working Party 23rd October 2008.

15. BACKGROUND PAPERS

Development of Options for the West Midlands RSS in Response to the NHPAU Report

- A main report setting out the results of the study
- A volume of Appendices
- A background review summarising evidence
- A Sustainability Appraisal of the options considered in the Study
- An assessment of the options in terms of the Habitats Directive

All these reports can be downloaded from
www.nlppanning.com/wmrsshousingoptions

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Bromsgrove District Council's formal response to the Nathaniel Lichfield and Partners (NLP) Report into Development of Options for the West Midlands RSS in Response to the NHPAU

The following report is Bromsgrove District Council's formal response to the NLP Study. The study should be read in conjunction with the District Council's response to the RSS phase 2 revision preferred option consultation.

The report has been split in 2 sections, Section 1 responds to the key findings of the NLP study and section 2 looks in more detail at the specific section of the report dealing with Bromsgrove District.

Section 1 Key findings

Bromsgrove District Council (BDC) have made the following observations on the findings of the NLP study

i. There is scope to identify additional land for housing in the region;

BDC does not accept this finding has any particular weight as it is inevitable that land can be found for housing, although it must be done with full consideration of all environmental, social and economic policy considerations, and through the RSS review process. As a district where 91% of the land is allocated green belt, which serves a strategic function as identified in Para 1.5 of PPG2, the planning merits of land release will have to be fully assessed through a strategic green belt review, before suggesting with any conviction whether or not the district should be allocated extra development. Issues such as the coalescence of specific settlements other than Birmingham and Solihull appear to have been given very little regard in this report. No consideration is given to the likely coalescence of settlements in Bromsgrove District should higher levels of housing growth be focussed on the Birmingham and Redditch borders.

The environmental consideration throughout the report focuses on the statutorily protected sites, and no real consideration is given to more locally significant environmental constraints any potential growth areas may offer, this cannot be overlooked and growth cannot be apportioned in any great detail until all the full effects have been evaluated.

ii. Additional housing need not harm achievement of Urban Renaissance;

By simply stating that there is no way of measuring urban renaissance and therefore allowing additional development will not harm it, is a view not wholly shared by BDC. The Council views urban renaissance as bringing together a wide range of social environmental and economic factors which provide opportunities for people to want to live, work, and invest in the MUAs.

BDC does not believe that this immeasurable urban renaissance is justification for directing high levels of additional growth to locations outside the MUA without detailed analysis of the local implications. The principle of urban renaissance is one which is a clear objective of the current RSS and one which should not be significantly eroded through the findings of this report. Additional higher levels of housing was considered at the spatial options stage of the RSS revision and was not included in the preferred option, and as such para 6.2 of the RSS states the *“excessive development on greenfield land outside the MUAs could fundamentally undermine the process of urban renaissance”*

iii. There is no evidence that increased housing supply outside the Major Urban Areas (MUAs) will reduce housing supply within them;

iv. There is no evidence that increasing housing supply outside the MUAs increases out-migration;

BDC questions these notions that by simply stating there is no evidence that housing outside the MUA will harm housing supply within them or increase out migration, is a strong justification for allowing higher levels of development to take place in places outside the MUA. BDC agree with the conclusion that the level of housing supply is a factor in peoples housing choice but other issues such as quality of life, employment, transport, and schools provision also play a significant part in the decisions taken in where people live.

These quality of life factors have led to high demand in Bromsgrove District for new housing which has been largely populated by people moving in from outside of the district, predominately the MUA. There is nothing to suggest that this pattern would not continue if more large scale development was focussed on the district.

The Bromsgrove housing market assessment concludes that over the last 5 years the district has gained over 6300 people from the conurbation which coincides with the completions of significant levels of new housing. Therefore, BDC questions whether or not there is any evidence to suggest that providing housing outside the MUA increases out migration.

v. There may be limits on how far it is possible to increase housing supply within the MUAs;

Whilst there will undoubtedly be issues and costs associated with delivering development on brownfield sites within the MUA, as stated above, Para 6.2 of the RSS maintains the position that excessive levels of development outside the MUA could harm the policy approach of urban renaissance. The release of significant levels of Greenfield sites could lead to developers' cherry picking these potentially easier to deliver sites, in favour of more difficult and costly sites within the MUA. If this process is allowed to happen through adopting the levels

and locations of growth as suggested by NLP's study, the principle of urban renaissance would be further eroded, and questions would have to be asked as to whether the review mechanism is the correct place for such a substantial shift in policy direction.

vi In some locations there are increased risks that additional supply could harm fragile markets and undermine housing market renewal, but could be overcome by careful phasing;

Bromsgrove District Council has no specific view on this aspect of the study but, understands and supports the notion that additional allocations in sensitive regeneration areas such as the pathfinders should be carefully considered, in order not to undermine the progress already being made on the areas.

vii Additional housing can support economic growth;

It is not disputed that additional housing can support additional economic growth, although the report does not consider the range and scale of land required for new employment uses to complement housing over and above that currently being proposed by the preferred option RSS. Similarly the report does not seem to consider in any great detail the requirement for other essential community facilities that the various levels of housing would need. The full implications of the housing proposals put forward in the NLP study cannot be assessed until the full requirements are known for other essential services. The funding of the services has also not been considered, and therefore the proposals carry a great risk of non delivery, if the correct funding mechanisms cannot be put in place to deliver key physical and community infrastructure.

viii. Birmingham needs more good quality housing in the City and its immediate hinterland to support its global role;

Bromsgrove District Council as a location in Birmingham's hinterland would again stress that a key aim of the RSS is facilitating the urban renaissance of the MUA. BDC has attracted significant levels of out migration from the MUA historically and whilst it is accepted that this trend is particularly hard to reverse, to encourage significant new growth over and above any justified need would not only encourage this movement of people out of the MUA, but also further undermine both the urban and rural renaissance objectives of the existing RSS.

ix. Additional housing growth can help address genuine affordability problems and meet housing needs;

The principle of simply increasing supply in an attempt to tackle affordability is one which has been much debated. Bromsgrove District Council has throughout the RSS revision process highlighted its concerns with the level of housing being associated directly with the district. The Council believes the current allocation of

2100 units will limit the districts ability to address the significant affordable housing supply problems within Bromsgrove. It is considered that allocating significant levels of new development to the district will not in itself address the issue of general affordability for open market housing. The high demand for housing in Bromsgrove could mean this approach would simply flood the market with housing, which is largely only available for affluent migrants from other areas of the midlands / country, who need to be close to Birmingham for employment purposes, but would prefer to live in the rural setting that Bromsgrove can offer. The impact of these migrants would be to maintain high houses prices, as across the district the demand would still be high resulting in the general market affordability remaining out of reach for many local residents.

The Council consider that a slightly larger allocation than currently being directed at Bromsgrove by the RSS revision, alongside a policy approach of higher levels of onsite affordable housing provision, and a higher percentage of smaller dwellings, would be a more successful and sustainable approach to addressing the affordable housing need in Bromsgrove.

x. Additional housing growth can support rural renaissance and support RSS objectives through regeneration;

Providing housing in rural locations can undoubtedly help support maintain or introduce vitality in rural settlements. The need to provide rural housing needs to be carefully balanced with all other policy considerations such as green belts, and other environmental and landscape classifications. BDC are concerned about the effects of large scale residential development on existing rural settlements. As mentioned above the level of development being suggested could mean the coalescence of villages within Bromsgrove into Birmingham and Redditch. The impacts of the new developments on those settlements which are currently not under threat of coalescence is also of concern. The new developments could act as a draw for people away from these villages into new developments reducing the vitality of villages, including deterioration in local services leading to polarisation of communities and social exclusion. Or alternatively if the correct levels of physical and social infrastructure are not provided to adequately serve these new developments, an undue strain could be placed upon these existing services causing significant negative effects for the current residents.

xi. Additional housing growth is likely to require the review of Green Belt but this is consistent with RSS objectives if it results in sustainable development and regeneration. There are also opportunities to increase coverage of Green Belt;

The RSS preferred option has indicated that a review of the green belt may be required in order to meet the housing needs up to 2026. This critical change of

direction in how the RSS is treating the green belt has not been approved. If accepted by the panel on the basis of the NLP study, it should be for the local authorities to determine where green belt boundaries are altered through detailed planning at a local level, which fully considers all the implications of surrendering green belt land.

xii. New settlements are a potential form of development that could meet requirements in the right locations and if the delivery capability is put in place;

BDC has no view on this finding, although notes that the current Eco town proposals have met with significant opposition and questions how deliverable entirely new settlements will be in the period up to 2026.

xiii. Transport issues are not a fundamental barrier to delivering more housing although investment in public transport alongside highway improvements will be needed in some locations;

BDC has concerns about the level of detail and importance placed on the provision of transport infrastructure. As with much of the consideration of infrastructure issues throughout the report, no real review of the possible funding for such schemes has been carried out, and therefore no real assessment of the likelihood of actually delivering the transport infrastructure required can be included.

The likelihood of delivering the transport infrastructure required to facilitate the preferred option of the RSS, is one which has been questioned throughout the revision process. To suggest that there are no fundamental barriers to providing even further amounts of growth appears to be an unfounded conclusion, especially when this report purely deals with housing, and does not give any consideration to the further infrastructure required to help deliver employment, retail, or any other land use.

xiv. Although there are localised hydrology and other issues to resolve there is no evidence that these cannot be addressed through investment in additional capacity or consideration of specific locations in Core Strategies;

As with above the lack of any real evidence does not justify the assumption that potentially significant issues can simply be overcome through investment at the local level. The report provides no evidence of where this investment will come from. The current economic climate is going to place much higher demands on the various funding streams that exist. Without considerably more money becoming available, BDC question the notion that hydrology and other localised issues can be addressed through investment and Core Strategies.

xv. The market downturn means the currently envisaged trajectory of housing will change but there is no fundamental market barrier to increasing supply provided there is sufficient suitable and available land;

The current market downturn has already caused significant issues on the ground with sites not coming forward and in some instances being closed down before completion takes place. Simply stating that sufficient land is available does not ensure that completion rates will return to previous levels and above. Even if they do, there is no certainty that it will happen early enough in the plan period for the higher levels now needed at the end of the period to be obtainable. Other significant factors such as maintaining the skills in the construction industry need to be considered as mentioned in the study, these are very much unknown and do not help to justify the assumption that there is no fundamental barrier.

xvi. The phased release of land needs to focus on managing the risks for fragile markets

The phasing of sites should always be focussed on delivering housing on brownfield land before releasing Greenfield sites. As mentioned above if large areas of green field land are allocated for housing growth, BDC has concerns over developers cherry picking Greenfield sites over brownfield, not only in the conurbation but favouring green field sites over the limited brownfield that exists in Bromsgrove and Redditch. BDC objects to the approach suggested by NLP of allowing significant greenfield release before all available brownfield is developed in order to make up for the difficulties the market is currently experiencing. The assumption that once some strength returns to the market developers will then re focus efforts on developing difficult, and expensive brownfield sites appears to be nothing more than an opinion unsubstantiated with any real evidence.

Section 2

This section deals with the element of the report which specifically mentions additional housing in Bromsgrove District.

Tables 1.1, 1.2, 7.2 and 9.2 all relate in part to allocating further development on the periphery of Bromsgrove District bordering Redditch and Birmingham. BDC strongly objects to these allocations of additional housing growth, on the basis that the level of detail the NLP study has been prepared to, in no way justifies land release at such a local level. Furthermore, part of the justification for apportioning further growth at the district level is because of market strength and affordable housing requirements. Allocating growth in these locations will not help in meeting Bromsgrove related affordable housing needs and does not focus on the Bromsgrove housing market where the perceived strength is.

Throughout the report NLP appears to suggest that it is for LDFs to determine the details of where growth should be accommodated, and specifically mentions

that the Bromsgrove LDF should determine where any additional growth in the district should be located. Somewhat confusingly NLP then suggests potential locations for additional growth in relation to Bromsgrove. This is clearly sending out mixed messages as to where it is best to accommodate growth in the district and the mechanism for achieving this.

NLP have identified that lower quartile housing in the Bromsgrove District remains unobtainable for a significant proportion of the households. The Council does not question this finding and has specific evidence of their own in the form of a housing market assessment completed in October 2008 which would back up this position. The Council does disagree with the suggested locations NLP make as to where new development should be focussed. The report seems to suggest that any new development over and above the RSS figures should be focussed on the South Birmingham and north Redditch borders. The Council completely disagrees with this approach, as an element of the justification for making these allocations is the ability of the extra housing to begin to tackle affordability issues within the district, the market strength of the district and the ability to deliver new housing. The affordable housing issues Bromsgrove faces is one which is prevalent across the whole of the district but especially in the largest settlements of Bromsgrove Town and Catshill. Therefore, to suggest development in areas of the district furthest away from these populations, and also adjacent to other districts would not help in tackling the identified affordability issues in Bromsgrove.

Any allocations which are justified by the need for affordable housing should be allocated to the district as a whole, in order for the core strategy process to determine the correct location for the development. The Council questions the reasoning of NLP in respect to affordable housing needs in Bromsgrove District.

Similarly, the ability of the District to deliver housing is one which is not debated, and also one which NLP have seemingly used to justify additional growth. BDC would again question the logic of the locations suggested for this growth as the high delivery in Bromsgrove over recent years has been dominated from completions in Bromsgrove Town. This would suggest the market strength is not in the areas of the district currently being focussed upon.

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BROMSGROVE DISTRICT COUNCIL

Local Development Framework Working Party

23rd October 2008

**Summary of Report prepared by Nathaniel Lichfield and Partners -
Development of Options for the West Midlands Regional Spatial Strategy in
Response to the National Housing and Planning Advice Unit report**

Responsible Portfolio Holder	Cllr Jill Dyer
Responsible Head of Service	Dave Hammond
Non-Key Decision	

1. SUMMARY

- 1.1 The report below summarises the findings of a study prepared by Nathaniel Lichfield and Partners (NLP) commissioned by the Government Office for the West Midlands (GOWM). This was in response to concerns expressed by Baroness Andrews, that the submitted preferred option Regional Spatial Strategy (RSS) review did not deliver the required amounts of housing as reported by the National Housing and Planning Advice Unit (NHPAU).

2. RECOMMENDATION

- 2.1 That members note the contents of this report

3. BACKGROUND

- 3.1 The summary below is structured to reflect the structure of the NLP study, as well as an overall summary of what each section contains, key findings specific to Bromsgrove, or general findings which could be applied to Bromsgrove have been included where possible.

- 3.2 The full title of the report is; Development of Options for the West Midlands Regional Spatial Strategy in Response to the National Housing and Planning Advice Unit report, and is split into 7 volumes which consist of;

- The Main Report
- The Appendices
- Background review
- Sustainability Appraisal (SA) - Non Technical summary
- Sustainability Appraisal (SA) - Full Report
- Habitat Regulations Assessment - Screening Report
- Habitat Regulations Assessment - Full Report

3.3 The focus of this summary is the main report and any relevant sections of the Appendices and the SA, the report is split into 9 chapters including an executive summary, which has been included with this report as appendix 1.

3.4 **Introduction**

This section of the report sets the context for the report and highlights the various sections. As members are aware the report has been commissioned in response to a request from Baroness Andrews, who expressed concern that the submitted RSS did not deliver the amount of new build housing that the NHPAU recommended would be required for the region in the next 20 or so years. The NHPAU's supply range indicated that between 12,300 to 80,700 additional new homes, over and above those already indicated in the RSS preferred option would be required across the region up to 2026, this brings the total amount required to somewhere between 365,600 (RSS preferred option) to 445,600 (upper limit of the NHPAU figures)

3.5 It is stressed in this section that the report is "*intended to provide a transparent and objective analysis of a series of options for delivering additional housing*" the GOWM will be using the report as a basis for their formal response to the RSS revision. It is unlikely Local Authorities will have any steer as to the nature of the GOWM response until the deadline of 8th December. NLP also make it clear that the results of their study are not formal policy or proposals of Government, but purely independent evidence which sets alternative choices for how the region *might* deliver additional housing to inform the Examination in Public on the Phase 2 RSS revision.

3.6 **Methodology**

This section describes how the report has been split into 5 separate processes, which are designed to either run concurrently, or be more discrete sections of work which have been informed by the preceding stage of the process and all come together at the end to for the complete study. NLP do stress that the report does not:

- Provide an exhaustive review of all implications of making provision for additional housing in line with the NHPAU supply range through RSS;
- Question the existing housing provision of RSS Phase 2 Preferred Option;
- Set out to identify the 'optimal' strategy for the region either in respect of housing provision or otherwise; or
- provide advice to the region and its stakeholders on the approach that RSS should take on a wide range of planning, economic or other matters.

3.7 **Element 1: Evidence base**

Volume three of the complete study contains the full review of all the background evidence which informed the RSS phase 2 preferred options. It also contains details of the various stakeholder meetings and findings from

the first regional seminar held by NLP. The review of the evidence was used to generate the original nine options for discussion.

3.8 Element 2: Generation of Options

The options were generated following on from the review of the evidence base and stakeholder meetings/seminar an internal consultant team workshop was also used. Nine options were generated which were presented at the second regional seminar on the 8th July, a summary of these options can be seen in appendix 2.

3.9 Element 3: Sustainability Appraisal

Under EU directive 2001/42/EC this study is not required to have a Sustainability Appraisal. However, to ensure the information contained is robust and credible it has gone through the same appraisal process as the preferred option RSS. Similarly as with the preparation of the BDC Core Strategy, the SA process is a continuous one which underpins the preparation of the report. The SA for the NLP study is also accompanied by a Habitat Regulations Assessment and has been prepared in conjunction with all the other elements of the study.

3.10 Element 4: Impacts and Risks

The nine options were then assessed with regard to the potential impacts and delivery risks, the level of the assessment being to determine if any of the options had potential ‘showstoppers.’ It was not a highly detailed assessment and it is accepted there will be more localised impacts and risks of some of the options which cannot be determined through a study of this level.

The criteria used to assess the impacts and risks are detailed below:

Impacts	Delivery Risks
Transport	Infrastructure Provision
Community and Social Infrastructure	Transport infrastructure
Hydrology	Market Delivery
Landscape	Planning
Housing Market	Public Sector Delivery
Economy	

3.11 Element 5: Impacts on RSS and Policy

The options were then tested against the principles and objectives of the RSS, Housing Green Paper and PPS3: Housing. The results of this testing are summarised in 3.26 to 3.31 below.

3.12 Background Evidence

As indicated in 3.7 a review of a huge amount of evidence took place in order to generate the options to be tested, and key findings from this review are highlighted below in 3.13 to 3.25

- 3.13 **RSS Policy** - The brief for the study stressed the work had to look at delivering higher levels of housing growth whilst maintaining as many of the principles of the RSS as possible. In looking through these principles, NLP conclude that there is not one which explicitly deals with meeting identified housing needs and tackling affordability, although it is accepted this issue is contained in national policy.
- 3.14 **Demographic Change** - The study does not test the current published levels of need or demand identified for the region, but rather it takes the NHPAU figures and determines which level within the range of figures identified is suitable and deliverable within the West Midlands region.
- 3.15 Research into population projections and migration flows indicate that none of the authorities across the region are likely to experience a decline in population over the period 2006-26. There are differences in the levels of indigenous growth with Birmingham experiencing high levels, and declines predicted in some of the more rural areas, such as Malvern. International migration is focussed on the conurbation whereas internal migration is an outward flow from the conurbation to Shire districts, such as BDC.
- 3.16 A comparison of the RSS provision with the 2008 household projections shows areas where there are shortfalls in provisions if only the preferred option houses were developed. This shows the biggest shortfall is in the south east quadrant of the region, which includes Bromsgrove, where a shortfall of approximately 5900 is identified for the district.
- 3.17 **Housing Markets, Affordability and Mix** -
A summary of the various housing markets assessments revealed a range of housing market issues across the region. Of particular importance for BDC is the finding that *'Within the South Housing Market Area there is a peculiar effect of a particular shortage of affordable accommodation reducing the apparent need for it by means of displacement of need to another district. The displacement effect of households in need will be quite significant for the districts of Bromsgrove and Stratford on Avon and Warwick.'* This clearly indicates that there is a problem of a lack of affordable housing in the district, which is being masked by the amount of people having to make their housing choices outside of the district.
- 3.18 Investigation into the relative affordability across the region shows a pattern of the southern and western Shire counties having the biggest gap in affordability. Malvern Hills has the biggest challenge; where lower quartile houses are 11.26 time higher than lower quartile incomes, whilst not as large in Bromsgrove, where a significant gaps exists, the ratio being 9.70 times higher. The Major Urban Area (MUA) has much smaller gaps in affordability, although even here they still remain a significant challenge.
- 3.19 **Housing Supply Land and Proposals** - Data also reveals that a large amount of new house building completions in the MUA over recent years has been apartment style development, which poses the question about the

mix of housing to be provided in the MUA in the years up to 2026. More provision is likely to be needed for family housing which obviously will have larger land requirements, limiting the ability of the MUA to deliver the gross amount of housing identified if the needs of the community are to be met.

- 3.20 Investigation also revealed that a high level of the supply identified is on hard to develop and expensive brownfield sites. The risks of relying on these sites to meet the needs are considerable, especially with the current downturn in the market, decreasing the viability of these sites further.
- 3.21 **Economic Change** - The region as a whole is judged to be underperforming economically when compared to other UK regions. This is largely based still on a reliance on the manufacturing industries, with a lower proportion of higher value added industry sectors such high technology. There have been areas of high employment growth in places like Malvern Hills and the South East quadrant; although Bromsgrove has been identified as having only small scale employment growth. Bromsgrove has been identified as having a high level of out commuting especially into Birmingham, with approximately 30-40% of working age people in Bromsgrove travelling into Birmingham for work.
- 3.22 **Regeneration** - There are a number of regeneration areas across the region mainly in the MUA such as the Birmingham/Sandwell pathfinder Housing Market Renewal Area. NLP have indicated these areas will have to be tackled sensitively when distributing new housing growth, in order to make sure current progress in these areas is not undermined.
- 3.23 **Transport infrastructure** - there has been significant investment in transport infrastructure over recent years with some significant schemes either underway or in some cases completed. It is identified that more will be required, especially at a local level, to deliver the RSS preferred option and therefore anything over and above this will also need to be factored in the final RSS.
- 3.24 **Energy, Utilities, and Hydrology** - The evidence used to support the RSS identifies there are some issues around the delivery of new water resources to support new housing growth, although these are more likely to be localised and should not prevent housing growth taking place. Similarly with managing flood risk, there will undoubtedly be localised issues which will have to be dealt with through the development of core strategies.
- 3.25 **Landscape, Ecology and other Planning Designations** - There are many of these types of designation across the region although, it is suggested, that the LDF process can help to maintain the integrity of these designations through careful allocations policies. One key consideration is the extent to which green belt designations are a constraint in reviewing the distribution of additional housing growth. NLP suggest it will be important to balance the impact of green belt alterations and the need to deliver additional housing growth.

3.26 Housing in the RSS Revision

This section of the NLP report summarises the figures contained within the RSS preferred option, which members have been briefed on at previous working groups meetings.

3.27 NLP benchmark the RSS proposals against some key criteria which indicate where the RSS is under-providing against both the projections for need and also the ability to deliver growth. For Bromsgrove the RSS under-provides on both counts. The benchmarking shows that Bromsgrove needs 5900 more units than being allocated just to meet the projections for required growth. Based on past build rates, the district can deliver 329 more units per annum than the RSS preferred option currently allows.

3.28 Housing Options

This section of the report describes the approach NLP took to developing the nine options and they are keen to point out the role of the Options is to reflect, and where necessary, test:

- The impacts on underlying objectives of RSS and Government Policy
- Key constraints on development
- The range of policy choices, their impacts, and ‘trade-offs’
- Deliverability

The nine options generated are summarised at appendix 2

3.29 The options are then appraised against the following criteria; Impact, delivery risks, SA, Habitat Regulations Assessment, and RSS and housing policy. All the options score differently in the assessment, with the options that deliver smaller amounts of growth scoring better against impact and risk criteria, although poorly against RSS and housing policy objectives, and the reverse happens for those options which propose larger amounts of growth. The options appraisal is then translated into more tangible evidence in the form of the impacts on Local Authority or core strategy areas. The section on Bromsgrove is shown below

Location (Core Strategy Area) Phasing and other	Phase 2 Revision Preferred Option	Option	Nos. of Additional Units	Key Issues and Impacts	Key Infrastructure Challenges	Key Delivery Risks	Implementation Implications for additional growth NLP Conclusions
Bromsgrove	2,100	3,9 7 8 9	6670 3500 5000 5000	Combination of proposals in options for Birmingham South and Redditch, alongside underlying significant ‘under-provision’ of RSS Phase 2 against CLG Projections (-5,900), past build rates (-329 pa), and major affordability ratio (9.7) indicate potential and need for further development. A review of the Green Belt would be necessary to accommodate growth.	There is a need to consider with providers the potential for combined impacts in south-west rail corridor. Depending on location,	Over doubling the RSS requirement Could present market capacity issues, and Redditch was not	Phasing would need to be dictated by timescales for transportation (e.g. train lengthening) and water supply/treatment improvements where necessary to support development, this might mean phasing to 2012+ Location of housing

			<p>Both Redditch and urban extensions to the Metropolitan area provide opportunities for using existing public transport infrastructure, alongside potential investment to upgrade.</p> <p>Good radial rail routes into Birmingham, but these lines have high utilisation and limited capacity approaching central stations, albeit that improvements are programmed.</p> <p>A need to consider the combined effect on rail provision to the south west in conjunction with development in urban area of Birmingham has been identified. In terms of the highway network, congestion on routes into Birmingham is currently significant. Whilst modeling demonstrated that growth would not give rise to significantly different impacts in comparison with RSS Phase 2 Revision Preferred Option, there is the potential for significant localised impacts depending on the location of development within the area. It has been suggested that impacts on the SRN would be most severe if development outside motorway box with potential impacts on motorway junctions that are currently at or close to capacity. Although these are important issues, there are potential mitigation measures and are not considered fundamental barriers to further housing growth, particularly at the lower levels.</p> <p>Area partly within Severn WRZ where there are water supply issues that will need to be addressed. Potential need for additional water treatment capacity depending on specific location.</p>	<p>development outside the motorway box could lead to significant traffic impacts on SRN that may require significant funding from development.</p> <p>There are challenges around ensuring sufficient water supply in Severn WRZ for both RSS Phase 2 Preferred Option and any additional growth.</p>	<p>identified as strong market focus if growth was located in that part of the Borough. Investment in infrastructure needed, and risk of non-delivery could hinder development but not considered a major issue, although market delivery could be an issue for higher output.</p>	<p>areas would need to consider infrastructure availability, funding and phasing of delivery at LDF stage in conjunction with providers/regulators</p> <p>Conclusion: Should be included in Options to reflect potential and opportunities for growth to Metropolitan area (c. 5,000 units) and Redditch (2,500 units)</p>
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3.30 The final column has significant impacts for Bromsgrove. In the conclusion NLP draw from the appraisal *Conclusion: Bromsgrove should be included in Options to reflect potential and opportunities for growth to Metropolitan area (c. 5,000 units) and Redditch (2,500 units)* the section on Redditch also indicated that growth can be catered for in Bromsgrove. It is on the basis of this appraisal that the final three growth scenarios were generated as described in 3.48 to 3.50.

3.31 The detailed analysis of all the nine options indicated that there are issues with physical impact and risk of delivering the higher levels of housing, although in many instances the actual impact or risk could not be quantified due to the strategic nature of the work. The main impacts and risks are flooding and flood risk and water supply; the outcomes of a green belt review; transport infrastructure; air quality; community and social infrastructure and economic. NLP are of the opinion that none of these impacts and risks should be insurmountable.

3.32 Section 8 of the study looks at two key areas, the first one being the RSS and Government objectives for housing and the second one is a summary of the most substantive opinions that were aired through the process of completing the study. The analysis of the RSS and Government objectives

identifies a number of key objectives that are particularly relevant to housing provision, they are;

- i) The deliverability of a variety of housing in both affordable and market sectors, taking into account the current economic downturn and the impact on timescales for delivering additional houses;
- ii) The implications for the MUAs and urban renaissance;
- iii) New settlements;
- iv) The impact on the Green Belt;
- v) Affordable housing supply;
- vi) The impact on transport and infrastructure;
- vii) The impacts on economic growth; and
- viii) The effect on rural renaissance.

The conclusions drawn from an analysis of these objectives are summarised below.

- 3.33 There is scope to identify more land for housing in the region. It is acknowledged that the identification of significant amounts of new supply will have localised impacts which are beyond the scope of this study to identify. The less visible impacts of not meeting the amount of new housing required must also be taken fully into account when considering land for new housing development.
- 3.34 The allocation of more housing to the region will not prevent the urban renaissance taking place. There is no evidence to suggest the amount of housing being proposed by the RSS is the full amount developable at which urban renaissance will take place, and nothing suggests that more development will prevent the urban renaissance taking place. The ability to define what the term 'urban renaissance' actually meant was also identified.
- 3.35 There is no evidence to suggest that allowing higher levels of development outside the MUA's will reduce supply within them and over recent years housing in the MUA's has risen due to the amounts of apartments developed. This market is now judged as being saturated and the restriction of supply outside the MUA's will not rekindle this market, as all it will do is restrict the overall amount of supply across the region.
- 3.36 There is no evidence to support the assumption that developing more housing in the rural areas of the region causes out migration. The availability of housing is one of the factors which influence these movement patterns alongside employment location; environmental quality; transport accessibility; quality of life / place (services / facilities / amenities); quality of education.
- 3.37 There are significant risks of under delivery if more housing is allocated to the MUA's which are already failing to meet the current targets for new housing development.

- 3.38 More allocations in fragile market areas could undermine existing regeneration strategies. Careful phasing in these areas needs to be employed to ensure that new supply does not attract people away from areas where regeneration initiatives have already begun.
- 3.39 In economic growth areas new supply can help to maintain growth by ensuring there are no labour supply deficiencies. This is particularly important in areas such as the south east of the region, where closely matching employment and housing growth is essential to support economic growth.
- 3.40 For Birmingham to fulfill its role as a world city, the hinterland needs to provide more good quality housing, restricting supply in areas outside the city, which are clearly within its housing market, harms the city's ability to grow to its desired potential.
- 3.41 Increasing supply can help to address affordability problems and meet housing needs. The evidence suggests that increasing supply will have an effect on reducing house prices. The greatest need is in the MUA, although the biggest gaps in affordability are in the Shire counties and rural areas. Increasing allocations in these more rural areas could deliver significant levels of affordable housing, as the developers can generally afford higher levels of affordable housing.
- 3.42 Additional growth is likely to require Green Belt release and urban extensions are judged to be more sustainable than leapfrogging the green belt. Mixed use extensions around south Birmingham in the south east of the region could have wider benefits of support in the economic growth already taking place in this location.
- 3.43 New Settlements can form part of the new supply regime, either as smaller (under 10,000 units) new settlements linked to existing settlement or entirely new standalone settlements, in the region of 20,000 units.
- 3.44 Transportation is not seen as a barrier to development, and the amount of new infrastructure required to deliver the higher growth options is not that much more than the amount required to deliver the preferred option. It is accepted that at the local level a significant amount of mitigation will be required to limit the impacts of new housing developments. Whilst the technical ability to deliver the required amount of transportation infrastructure is not questioned by NLP, they point how risks of delivery could be high due to the financial implications of this level of infrastructure and whether or not they have already been considered in existing funding commitments.
- 3.45 Hydrology is not seen as a significant issue which cannot be overcome by investment in infrastructure and careful consideration of potential new sites through the development plan process in core strategies.

3.46 It is acknowledged that the current downturn in the market will have an adverse effect in the short term on the ability of the region to develop the amounts of new housing being tabled, although in the longer term with more stable financial environment it is deemed to be possible. An analysis of long term building rates identified that the housing market has the ability to increase production significantly with favourable financial conditions. A number of concerns are expressed such as the percentage of affordable housing required on sites preventing development taking place. One possible solution to this issue could be to reduce the on site targets to allow a lower percentage of affordable housing, and on a larger quantum of housing which may deliver the same or more units than applying a higher rate to a lower level of supply. Another key issue could be the current market downturn and lack of development taking place reducing the amount of new recruits to the development industry. This could create a skills gap which would need to be filled before the industry could develop housing to its full potential when the financial markets strengthen. With these possible scenarios taken on board NLP, take the view that the upper level of the NHPAU range 80,000 more units than currently proposed (445,600 in total to 2026) would be a significant challenge, and somewhere in the mid range is more likely to be delivered.

3.47 Section 9 draws together the findings indicated in the various sections above and attempts to suggest more tangible conclusions as to what they all mean for the distribution of the NHPAU supply range of housing across the West Midlands region. NLP have done this by suggesting three different scenarios for additional growth. Scenarios 1 and 2 look to deliver between an additional 51,500 and 54,000 new units, and scenario 3 looks more to the upper range being suggested by the NHPAU and suggests 80,000 additional properties are delivered. These scenarios recommend Bromsgrove can take more growth although not necessarily in locations which provide the largest benefit for the district.

3.48 **Scenario 1 - South East Focus**

This scenario focuses growth in the South East corner of the region, and with some provision in the rural west, which identified scope for some 51,500 additional dwellings (an extra 2,575 per annum), providing a total of 417,100 dwellings by 2026. The ratio of provision between MUAs and non-MUAs as a whole, would move from 46:54 to 47:53. Provision would be focused on parts of the region, with some of the greatest levels of unmet need and affordability, with principal increases in the south and central C1 Housing Market Areas. This option would involve a new settlement in Solihull. This scenario would see growth arguably supporting parts of the region where economic growth is potentially being hampered by a lack of housing. This scenario indicates an additional 5,000 dwellings in Bromsgrove, although they are recommending they are provided through urban extensions to south Birmingham (2500 units) and Redditch (2500 units).

3.49 Scenario 2 - Spreading Growth

This scenario, delivering circa 54,000 additional dwellings (419,600 in total and an extra 2,700 pa) makes provision in the south east of the region where economic growth is strongest (although less than in the previous scenario). This also includes growth in North Staffordshire, Telford and Wrekin, and East Staffordshire, where there is additional capacity for development, and with appropriate phasing, funding and delivery mechanisms to support delivery. This spreads the development and market risk across a wider area. The ratio of MUA to non-MUA for housing distribution would be 47:53, with the focus of growth in both the south east and in part of the north of the region, with identified capacity and/or scope for additional growth, supporting affordability; economic and regeneration objectives. Again this scenario indicates an additional 5,000 dwellings in Bromsgrove, although they are recommending they are provided through urban extensions to south Birmingham (2500 units) and Redditch (2500 units).

3.50 Scenario 3 - Maximising Growth

This potential scenario, which delivers 80,000 additional dwellings (445,600 in total and 4,000 extra per annum) makes higher levels of provision across a range of locations in the region. This includes in and around the southern side of the Metropolitan MUA, in Telford and Wrekin, North Staffordshire, East Staffordshire, and Stafford, alongside rural housing provision in the west of the Region. It is undoubtedly the case that this higher level of provision, whilst not necessarily unachievable, provided sufficient available and developable land is released, would be a higher risk, given the level of build rates required. The ratio of MUA to non-MUA for housing distribution would be 46:54, with significant levels of growth in the key locations identified in the preceding scenarios, focusing on affordability, economic, regeneration and additional capacity opportunities. This scenario indicates an additional 7,500 dwellings in Bromsgrove, although they are recommending they are provided through urban extensions to south Birmingham (5000 units) and Redditch (2500 units).

3.51 As already indicated in paras 3.33 to 3.46 the overall findings of the study are:

- There is scope to identify additional land for housing within the Region.
- Additional housing provision need not harm achievement of Urban Renaissance.
- There is no evidence that increased supply outside the MUAs will reduce housing supply within them.
- There is no evidence that increasing housing supply outside the MUAs increases out-migration.

- There may be limits on how far it is possible to increase housing supply within the MUAs.
- In some locations there are increased risks that additional supply could harm fragile markets and undermine housing renewal, but could be overcome by careful phasing.
- Additional housing can assist economic growth and Birmingham needs more good quality housing in the city and its immediate hinterland, to support its global role.
- Additional housing growth can help address genuine affordability problems and meet housing needs.
- Additional housing growth can support rural renaissance and support RSS Objectives for regeneration.
- Additional housing growth is likely to require the review of Green Belt, but this is consistent with the RSS Objective if it results in sustainable development and regeneration. There are also opportunities to increase coverage of Green Belt.
- New Settlements are a potential form of development that could meet housing requirements, in the right locations, and if the delivery capability is put in place.
- Transport issues are not a fundamental barrier to delivering more housing, although investments in public transport alongside highway improvements will be needed in some locations.
- Although there are localised hydrology issues to resolve, there is no evidence to suggest that these cannot be addressed through investment in additional capacity or consideration of specific locations in Core Strategies.
- The market downturn means the trajectory of housing delivery will change from that envisaged by the RSS Phase 2 Preferred Option, but there is no fundamental market barrier to increasing supply, provided that there is sufficient supply of suitable and available land for development.
- The phased release of land needs to focus on managing the risks for fragile markets, whilst also ensuring that supply increases as quickly as possible out of the downturn.

3.52 Next Steps

The NLP study is essentially being used to inform the GOWM's response to the RSS preferred option. Over the next few weeks the Strategic planning section will be preparing submissions on the RSS preferred option and potentially a separate submission on the NLP study in time for them to be submitted to the WMRA by the 8th December deadline. These submissions will deal in more detail with the implications of the RSS policies and the findings of the NLP study as well as other studies which can inform the RSS review. Following on from that, the RSS revision will go through an Examination in Public (EIP) in April 2009. The timetable for the process beyond the EIP is unknown at the moment, although it is not expected the full Phase 2 review of the RSS will be completed during 2009.

4. FINANCIAL IMPLICATIONS

4.1 None

5. LEGAL IMPLICATIONS

5.1 None

6. COUNCIL OBJECTIVES

6.1 The implications of the NLP study could have significant effects on the ability of the Council to deliver its housing and regeneration priorities, although the full extent will not be known until the process is complete. Representations and participation in the Examination in Public could influence the final RSS to include policy elements which better meet the needs of the district than those currently being proposed.

7. RISK MANAGEMENT

7.1 The main risks associated with the details included in this report are:

- The ongoing delays caused by the request for this study to be carried out effects the ability of the district to produce its own Development Plan Documents, specifically the core strategy.

7.2 These risks are being managed as follows:

Risk Register: Planning and Environment
Key Objective Ref No: 6
Key Objective: Effective, efficient, and legally compliant Strategic planning Service

8. CUSTOMER IMPLICATIONS

8.1 None

9. EQUALITIES AND DIVERSITY IMPLICATIONS

9.1 None

10. VALUE FOR MONEY IMPLICATIONS

10.1 None

11. OTHER IMPLICATIONS

Procurement Issues	None
Personnel Implications	None
Governance/Performance Management	None
Community Safety including Section 17 of Crime and Disorder Act 1998	None
Policy	The outcome of the RSS review will effect the content of future planning policies in the district
Environmental	The environmental implications of providing significant levels of new housing, potentially on green field sites are difficult to quantify at the moment although they will have to be fully considered through preparation of the various LDF documents.

12. OTHERS CONSULTED ON THE REPORT

Portfolio Holder	Yes
Chief Executive	Yes
Executive Director - Partnerships and Projects	Yes
Executive Director - Services	Yes
Assistant Chief Executive	Yes
Head of Service	Yes
Head of Financial Services	Yes
Head of Legal, Equalities & Democratic Services	Yes
Head of Organisational Development & HR	No
Corporate Procurement Team	No

13. WARDS AFFECTED

All Wards are potentially affected by the RSS

14. APPENDICES

14.1 Appendix 1

Development of Options for the West Midlands Regional Spatial Strategy in Response to the National Housing and Planning Advice Unit report - Executive Summary.

14.2 Appendix 2

Summary of Options generated by NLP to test growth scenarios across the West Midlands Region.

15. BACKGROUND PAPERS

Development of Options for the West Midlands RSS in Response to the NHPAU Report

- A main report setting out the results of the study
- A volume of Appendices
- A background review summarising evidence
- A Sustainability Appraisal of the options considered in the Study
- An assessment of the options in terms of the Habitats Directive

All these reports can be downloaded from
www.nlpplanning.com/wmrsshousingoptions

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BROMSGROVE DISTRICT COUNCIL

CABINET

3RD DECEMBER 2008

CAPITAL PROGRAMME 2009/10-2011/12

Responsible Portfolio Holder	Councillor Geoff Denaro
Responsible Head of Service	Jayne Pickering – Head of Financial Services
Non Key Decision	

1. Summary

- 1.1. To provide information to enable the Cabinet to review the position on the Capital Programme for 2009/10-2011/12 and to make recommendations to full Council for its approval.

2. Recommendations

- 2.1. It is recommended that Cabinet recommend to full Council that:
 - 2.1.1 The revised Capital Programme for 2009/10 to 2010/11 of £4.064m and £3.407m be noted
 - 2.1.2 The Capital Programme for 2011/12 of £1.489m be noted
 - 2.1.2 Due to the financial impact of borrowing, Cabinet requests officers to review the position on the Capital Programme with the aim to reduce the proposed Programme and to include only those projects that can be considered as being unavoidable in the delivery of services to the residents.

3. Background

- 3.1. The Council on 16th January 2008 approved a medium term financial plan that included the Capital budget requirements for 2008/09 to 2010/11.
- 3.2. During 2008/09 Cabinet proposed a streamlined set of 4 priorities against the Council objectives for focus of resources which were approved by Full Council on 17th September 2008. These were:
 - Town Centre
 - Housing
 - Sense of Community
 - Clean Streets & Climate Change

- 3.3 The Capital Programme resources are to be aligned to the delivery of the priorities for the Council.

4 Capital Programme

- 4.1 As part of the Medium Term Financial Plan 2007/08 members approved a number of criteria in relation to the Capital Programme including:

- The capital programme is limited to £1m per annum funded from the Council's own resources (in order to maximise the investment interest);
- Cabinet give consideration to fund housing grants over and above the £1m.

- 4.2 Cabinet also approved the capital investment criteria (as part of the Capital Strategy) that a scheme should satisfy for inclusion in the capital budget as follows:

- Enable delivery of the Councils priorities
- Maintain existing assets to standards suitable for service delivery.
- Improve and acquire assets to meet service and customer needs.
- Improve the stewardship of assets; spend to save (innovative schemes that will secure the Council a better rate of return than the investment interest earned); to reduce longer-term problems and liabilities.
- Satisfy legal obligations of the Council (e.g. health and safety requirements, and compliance with the disability discrimination legislation).
- Develop community assets in areas of need.
- Maximise the use of other funds to encourage investment in specific areas such as energy efficiency, economic development and infrastructure developments (using funds derived from Section 106 agreements with developers).
- Maximise the benefits of partnership working.

- 4.3 The Capital Programme for 2009/10 and 2010/11 was approved as part of the 3 year Financial Plan for 2008/09. The projects approved are detailed at Appendix A and equate to £2.152m (2009/10) and £1.557m (2010/11). The total schemes are in excess of the £1m target due to the consideration of delivery of priorities and to ensure a replacement programme being available for Street Scene fleet and replacement CCTV cameras.

- 4.4 In September 2008 members approved a revised Capital Programme to realign the projects to be delivered during 2008/09. There are a number of projects that are to be delivered in 2009/10 from this review that have been identified as "roll forward" and are included at Appendix B for consideration. These projects equate to £1.228m and include the refurbishment of the toilet block in the town centre, the provision of district wide sports facilities and the upgrade of Houndsfield Lane

Caravan Site. The majority of these schemes are funded by ringfenced capital receipts and grants.

- 4.5 The consideration of Business Plans and consideration of the key priorities has identified a number of new projects to be delivered during the financial plan period 2009/10-2011/12. These are identified at Appendix C and equate to £644k (2009/10), £1.850m (2010/11) and £1.351k 2011/12. The projects to be delivered include maintaining the replacement of fleet and plant within street scene, an annual payment of grants to Registered Social Landlords, undertaking water course works, improving parks and cemeteries, and costs associated with the wheeled bins required for co-mingled collections.
- 4.6 A summary of the proposed capital programme including; approved programme, roll forward and new capital schemes is shown in the following table:

PROPOSED CAPITAL PROGRAMME	2009/10	2010/11	2011/12
	£'000	£'000	£'000
Street Scene & Community	1,797	1,672	1,001
Policy and Performance	75		
Legal and Democratic	207	284	
Housing schemes / P&E	1,852	1,315	350
Support Services Recharges (to be charged to schemes)	133	136	138
TOTAL PROPOSED CAPITAL	4,064	3,407	1,489

- 4.7 The capital programme will be financed from a variety of sources including Government Grants, Section 106 Funds and capital receipts including those that the Council has been allowed to retain under the new capital 'pooling' arrangements, and borrowing. Details of the proposed financing arrangements for the capital programme are shown below:

	2009/10	2010/11	2011/12
	£'000	£'000	£'000
Capital Receipts			
Capital receipts or borrowing	2,793	2,776	1,139
Housing schemes financed from capital receipts ring fenced for low cost housing	425	350	350
Total capital receipts or borrowing	3,378	3,126	1,489
Government Grants	846	281	
Total Programme	4,064	3,407	1,489

- 4.8 If Members approve the level of Capital Spend to 2011/12 the effect on capital receipts will be as follows based on expected expenditure in 2008/09:

	2009/10	2010/11	2011/12
	£'000	£'000	£'000
Opening Balance	3,335	642	-1,498
Used in Year	-2,793	-2,776	-1,139
Received in year	100	100	100
Use of Replacement reserves		-536	
Closing Balance	642	-1,498	-2,537

The figures in the above table include general capital receipts for funding of projects across the District. In addition an estimate of capital receipts has been made of £100k per annum in relation to any sales of assets that the Council may make during the financial plan period.

- 4.9 If all Capital Programme funding requests are approved there will be a need to fund £1.498m through borrowing in 2010/11 and a further £1.039m in 2011/12. This would create a significant impact on the revenue position of the Council to reflect the loan repayments and interest charged. It is proposed that officers assess their requirements in consideration of the impact on resources with the aim to reduce the Programme to deliver only those projects which are unavoidable to ensure delivery of services to residents.

5 FINANCIAL IMPLICATIONS

- 5.1 None other than those included in the report.

6. LEGAL IMPLICATIONS

- 6.1 None as a direct result of the Capital Programme.

7. CORPORATE OBJECTIVES

- 7.1 The delivery of a Capital Programme demonstrates the Councils ability to fund objectives and priorities within a the resources available to it

8. RISK MANAGEMENT

- 8.1 The main risks associated with the details included in this report are:

- Non compliance with the statutory deadlines to set a balanced budget to include Capital requirements.

- No formal consultation undertaken with the public
- Poor use of resources scoring in relation to consideration of options and Value for Money in considering projects to be delivered.
- Poor delivery of the project planning of capital projects

8.2 These risks are being managed as follows:

8.2.1 Non compliance with statutory deadlines

Risk Register: Financial Services
Key Objective Ref.: 6
Key Objective: Effective and Efficient Accountancy Service

8.2.2 No formal consultation undertaken with the public

Risk Register: Financial Services
Key Objective Ref.: 6
Key Objective: Effective and Efficient Accountancy Service

8.2.3 Poor use of resources scoring in relation to consideration of the options and value for money

Risk Register: Financial Services
Key Objective Ref.: 6
Key Objective: Effective and Efficient Accountancy Service

8.4 Key actions and controls to manage these risks include:

- Detailed timetable in place to manage the budget process with departments and accountancy support
- Allocation of qualified and professional staff to focus on budget setting accounts
- Regular updates at Corporate Management Team in relation to budget processes
- Formal consultation on the budget with the Budget Jury
- Review of Capital Programme within the Asset management group
- Formal consultation with customer panel via SNAP in place

9. **CUSTOMER IMPLICATIONS**

9.1 The setting of the budget against the Corporate Priorities will ensure that the Council demonstrates to the customer that we have aligned our resources to the key services required.

10. **OTHER IMPLICATIONS**

Procurement Issues N/A

Governance/Performance Management N/A
Community Safety including Section 17 of Crime and Disorder Act 1998 N/A
Policy N/A
Environmental N/A
Equalities and Diversity N/A

11. **OTHERS CONSULTED ON THE REPORT**

Portfolio Holder	no
Chief Executive	Yes
Corporate Director (Services)	Yes
Assistant Chief Executive	Yes
Head of Service	Yes
Head of Financial Services	Yes
Head of Legal & Democratic Services	Yes
Head of Organisational Development & HR	Yes
Corporate Procurement Team	Yes

12. **APPENDICES**

Appendix A – Current Approved Capital Programme 2009/10- 2010/11

Appendix B – Roll Forward requests 2008/09 to 2009/10

Appendix C – New Bids 2009/10-2011/12

13. **BACKGROUND PAPERS**

Budget timetable

Detailed budget working papers

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APPROVED CAPITAL PROGRAMME 2009/10-2010/11

APPENDIX A

Service Area	Description of Bid	2009/2010 £'000	2010/2011 £'000	Commentary	Funding
Legal & Democratic	Remedial Work to Council Buildings following Stock Condition Surveys	207	284	To deliver the planned programme of maintenance required for the Council buildings as identified via external assessments	Capital Receipts/Prudential Borrowing
Planning & Environment	Discretionary Home Repair Assistance & Housing Renewal Grants (Private Sector Only)	168	173	Home Repair & maintenance assistance grants	Capital Receipts/Prudential Borrowing
Planning & Environment	Mandatory Disabled Facilities Grants (DFG's) - Private & BDHT Grants	399	411	Mandatory Disabled facilities Grants (% for BDC)	Capital Receipts/Prudential Borrowing
Planning & Environment	Town Centre Development	100	100	Improvements and redevelopment of Town Centre	Capital Receipts/Prudential Borrowing
Planning & Environment	Mandatory Disabled Facilities Grants (DFG's) - Private & BDHT Grants	281	281	Mandatory Disabled facilities Grants (% for Grant)	Government Grant
Street Scene & Community	Replacement of CCTV Equipment	290	79	Planned programme of replacement CCTV cameras	Capital Receipts/Prudential Borrowing
Street Scene & Community	Street Scene Depot Vehicle Replacement Programme (Commercial Services)	13		Maintain the planned programme of replacement vehicles for commercial services fleet	Capital Receipts/Prudential Borrowing
Street Scene & Community	Street Scene Depot Vehicle Replacement Programme (Garage Services)	15	25	Maintain the planned programme of replacement vehicles for garage services fleet	Capital Receipts/Prudential Borrowing

APPROVED CAPITAL PROGRAMME 2009/10-2010/11

APPENDIX A

Service Area	Description of Bid	2009/2010 £'000	2010/2011 £'000	Commentary	Funding
Street Scene & Community	Street Scene Depot Vehicle Replacement Programme (Grounds)	102	54	Maintain the planned programme of replacement vehicles for grounds maintenance fleet	Capital Receipts/Prudential Borrowing
Street Scene & Community	Street Scene Depot Vehicle Replacement Programme (Multi-lift Vehicle)	12		Maintain the planned programme of replacement vehicles for multi lift plant	Capital Receipts/Prudential Borrowing
Street Scene & Community	Street Scene Depot Vehicle Replacement Programme (Recycling)	13		Maintain the planned programme of replacement vehicles for recycling service	Capital Receipts/Prudential Borrowing
Street Scene & Community	Street Scene Depot Vehicle Replacement Programme (Refuse Collection)	273	14	Maintain the planned programme of replacement vehicles for refuse collection service	Capital Receipts/Prudential Borrowing
Street Scene & Community	Street Scene Depot Vehicle Replacement Programme (Street Cleaning)	146		Maintain the planned programme of replacement vehicles forstreet cleaning service	Capital Receipts/Prudential Borrowing
	SUPPORT SERVICES RECHARGES TO CAPITAL (To be recharged over all schemes in 2008/09, 2009/10 & 2010/11)	133	136	Support service recharge	Capital Receipts/Prudential Borrowing
TOTAL APPROVED SCHEMES		2,152	1,557		

Service Area	Description of Bid	2009/2010 £'000	Commentary	Funding	Council Priority
Planning and Environment	Grants to Principal Preferred Partners (BDHT/ W Mercia) for the development of affordable housing in the district.	350	Grants to preferred partners to deliver affordable housing across the District - not delivered during 2008/09 due to issues with economy and development of housing property	Capital Receipts / Prudential Borrowing	Housing
Street Scene and Culture	New Toilet Block in Town Centre	174	Provision of refurbished town centre toilet to ensure DDA compliant. Not delivered in 2008/09 due to consultation being undertaken with users	Capital Receipts / Prudential Borrowing	Town Centre
Planning and Environment	Upgrading of Houndsfield Lane Caravan Park	129	To upgrade the caravan site	Capital Receipts / Prudential Borrowing	Housing
Street Scene and Culture	New Park at Barnsley Hall (Part funded from Liveability Fund.)	215	To provision park/sports facilities at Barnsley Hall site - not delivered in 2008/09 due to awaiting outcome of PPCG 17 to identify areas of need	Capital Receipts & Liveability Fund	Sense of Community
Street Scene and Culture	District Wide Provision/Enhancements of Sports Facilities	360	To provision park/sports facilities across the District - not delivered in 2008/09 due to awaiting outcome of PPCG 17 to identify areas of need	Grant Funded	Sense of Community
TOTAL ROLL FORWARD		1,228			

Service Area	Description of Bid	2009/2010			2010/2011			2011/2012			Commentary	Funding	Council Priority
		£'000		75	£'000		350	£'000		350			
Policy & Performance	Community Transport			75						To provide 1 wheelchair adapted vehicle and related software and equipment to deliver community transport across the District.	Capital Receipts / Prudential Borrowing	Sense of Community & Town Centre	
Planning & Environment	Gypsy site renovations			75						Additional capital grant to top up the existing £129,000 previously approved for the Council (25%) contribution toward seeking Government Grant for the refurbishment and extension of the Gypsy and Traveller caravan site at Wrythall.	Ringfenced Capital Receipts	Housing and Sense of Community	
Planning & Environment	Registered Social Landlords (RSL) grants			350						Local authority grant budget for allocation to the Council's Principal Preferred RSL Partners to assist in the development of affordable housing in the District.	Ringfenced Capital Receipts	Housing and Sense of Community	
Street Scene & Community	Spadesbourne Brook and cleansing of Water Courses			25						To purchase a vehicle to support the street scene department fulfill role of cleansing water courses	Capital Receipts / Prudential Borrowing	Town Centre, Clean Streets & Climate Change.	
Street Scene & Community	Tourist Information Centre (TIC)			40						Moving the TIC by locating it within the dolphin centre	Capital Receipts / Prudential Borrowing	Sense of Community	
Street Scene & Community	Parks & cemeteries			45						To undertake works to comply with Health & Safety requirements to include changes to paths and access	Capital Receipts / Prudential Borrowing	Sense of Community	
Street Scene & Community	Lifeline kit replacement - PNC5			54						To purchase replacements lifeline computer system to deliver an enhanced system and generate additional income for the service	Capital Receipts / Prudential Borrowing	Sense of Community	
Street Scene & Community	Wheeled bins for co-mingled collections									Wheeled bins for the co-mingled collection service and will provide a third bin for properties that require a green waste collection. They will replace the existing red and blue boxes.	Capital Receipts / Prudential Borrowing	Climate Change	

Service Area	Description of Bid	2009/2010 £'000	2010/2011 £'000	2011/2012 £'000	Commentary	Funding	Council Priority
Street Scene & Community	Replacement for recycling vehicles		600		5 New Refuse collection vehicle to replace the existing fleet of recycling vehicles for the co-mingled collection service	Capital Receipts / Prudential Borrowing	Climate Change
Street Scene & Community	Street Scene Depot Vehicle Replacement Programme (Grounds)			17	To maintain the 10 year programme of replacement fleet within the Grounds Maintenance Services	Capital Receipts / Prudential Borrowing	Climate Change
Street Scene & Community	Street Scene Depot Vehicle Replacement Programme (Refuse Collection)			984	Replacement of remainder of refuse collection fleet	Capital Receipts / Prudential Borrowing	Climate Change
Street Scene & Community	Access Improvements to Allotment Sites	20			Access Improvements at Watt Close Allotment, Stourbridge Road Allotment and Roundhill Allotment Sites.	Capital Receipts / Prudential Borrowing	Sense of Community
TOTAL NEW BIDS		684	1,850	1,351			

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BROMSGROVE DISTRICT COUNCIL

CABINET

3RD DECEMBER 2008

COUNCIL TAX BASE CALCULATION 2009-2010

Responsible Portfolio Holder	Councillor Geoff Denaro
Responsible Head of Service	Jayne Pickering - Head of Financial Services

1. Summary

- 1.1 The Local Authority (Calculation of Council Tax Base) Regulations require the Council to determine its Council Tax Base for the coming financial year and to notify precepting authorities of the outcome between 1st December and 31st January in the preceding financial year.

For the financial year 2009-2010 the Council Tax base is estimated at 36,290.23 Band D equivalents when applying a 99% collection rate.

2. RECOMMENDATION

It is recommended that in accordance with the Local Authorities (Calculation of Tax Base) Regulations 1992, the Council's Tax base for 2009-2010, assuming a collection rate of 99.00%, is calculated at 36,290.23 for the area as a whole. Individual parishes are shown at **Appendix 1** of this report.

3. BACKGROUND

- 3.1 The Local Authority (Calculation of Council Tax Base) Regulations require the Council to determine its Council Tax Base for the coming financial year and to notify precepting authorities of the outcome between 1st December and 31st January in the preceding financial year. This is done by parish and the information is used to calculate the Council Tax bills each March for the following financial year.

When determining the Council Tax Base, Councils are required to estimate the proportion of the tax to be collected in the coming year after making allowances for banding changes, exemptions, discounts, new properties and losses on collection. For 2009 -2010, a collection rate of 99.00% is expected. When applied to the estimated Council Tax Base of 36,656.8 Band D equivalents, it results in a 'net' figure of 36,290.23. This represents

a 0.2% increase on 2008/09 which is less than the anticipated 1% increase used during the budget approval for 2009/10. The financial impact of this shortfall is £54k.

In addition, it is necessary to calculate the Council Tax Base, expressed as Band D equivalents, for the area as a whole and for individual parish areas. This information is shown at **Appendix 1**.

3.2 This is a statutory requirement and no consultation is required.

4. FINANCIAL IMPLICATIONS

4.1 This forms the basis of the calculation of Council Tax for the new financial year.

5. LEGAL IMPLICATIONS

5.1 Publishing the Council Tax Base between 1st December and 31st January in the preceding financial year is a legal requirement.

6. CORPORATE OBJECTIVES

6.1 Collection of Council Tax underpins the corporate objectives of the Council.

7. RISK MANAGEMENT

7.1 There are no risk management issues.

8. CUSTOMER IMPLICATIONS

8.1 The Council Tax Base forms the basis of the calculation of Council Tax for 2009-2010. These bills will be sent out in March 2009.

9. OTHER IMPLICATIONS

Procurement Issues - None
Personnel Implications - None
Governance/Performance Management - None
Community Safety including Section 17 of Crime and Disorder Act 1998 - None
Policy - None
Environmental - None
Equalities and Diversity - None

10. OTHERS CONSULTED ON THE REPORT

Portfolio Holder	Yes
Chief Executive	No
Executive Director (Services)	Yes
Executive Director (Partnerships and Projects)	No
Head of Financial Services	Yes
Head of Legal & Democratic Services	No
Head of Organisational Development & HR	No
Corporate Procurement Team	No

11. APPENDICES

Appendix 1 Council Tax Base Calculation for 2009-2010

12. BACKGROUND PAPERS

Local Authorities (Calculation of Tax Base) Regulations 1992

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Tel: (01527) 881249

Council Tax Base Calculation 2009-2010

The Council Tax Base calculation for each parish is detailed below (Band D equivalents).

Parish Name	Gross	Net (99.00%)
Alvechurch	2284.70	2261.85
Barnt Green	933.30	923.97
Belbroughton	1212.60	1200.47
Bentley Pauncefoot	188.50	186.62
Beoley	468.10	463.42
Bourneheath	219.60	217.40
Catshill & Marlbrook	2434.10	2409.76
Clent	1211.40	1199.29
Cofton Hackett	746.90	739.43
Dodford with Grafton	401.90	397.88
Finstall	284.90	282.05
Frankley	51.20	50.69
Hagley	2133.80	2112.46
Hunnington	244.50	242.06
Lickey and Blackwell	2078.90	2058.11
Lickey End	1108.20	1097.12
Romsley	713.90	706.76
Stoke Prior	1741.30	1723.89
Tutnall and Cobley	351.90	348.38
Wythall	4842.00	4793.58
Urban	13005.10	12875.04
TOTALS	36656.80	36290.23

BROMSGROVE DISTRICT COUNCIL

CABINET

3RD DECEMBER 2008

STREET CLEANSING POLICY

Responsible Portfolio Holders	Councillors Mrs M Sherrey & Mrs J Griffiths
Responsible Head of Service	Michael Bell
Key Decision	

1. SUMMARY

1.1 This report seeks to gain Members approve of the Street Cleansing Policy.

2. RECOMMENDATION

2.1 It is recommended that Members approve and acknowledge the Street Cleansing Policy, see Appendix 1.

3. BACKGROUND

3.1 Bromsgrove District Council, under the Environmental Protection Act 1990, is described as a Principal Litter Authority and consequently has a duty to remove litter from relevant land.

3.2 Relevant land is generally that which is open to the air and to which public access is permitted without payment.

3.3 Street Cleansing duties have been undertaken on relevant land up until this point without a written operational policy. A policy has been produced to ensure the Street Cleansing duties and service standards are formally recognised.

3.4 The policy will be used to inform stakeholders of the activities currently undertaken, the correct reporting processes for street cleansing issues, and the processes in place to monitor the service.

3.5 In light of recent significant improvements to Street Cleansing functions, the formalisation of a policy is a necessary step in the progression of this service.

4. FINANCIAL IMPLICATIONS

- 4.1 There are no specific financial implications connected directly to this report and all of the operational activities in the Street Cleansing Policy will be covered by the annual budget currently provided for this function.

5. LEGAL IMPLICATIONS

- 5.1 The Environmental Protection Act 1990 is the legislative instrument which details the responsibility of a local authority in regards to litter and other street cleansing duties. The Act defines Bromsgrove District Council as a Principal Litter Authority and therefore responsible for the street cleansing issues outlined in the Street Cleansing Policy
- 5.2 The Clean Neighbourhoods and Environment Act 2005 further extended the powers of a local authority and identified increased penalties and enforcement actions.
- 5.3 For the avoidance of doubt, this report is not concerned with the enforcement of litter, abandoned vehicles, fly tipping, dog fouling, fly posting or graffiti. Any use of enforcement activities will be covered by other reports.

6. COUNCIL OBJECTIVES

- 6.1 The Street Cleansing policy will support the Council's Corporate objectives of Environment and Sense of Community and Well Being. It also contributes towards the priorities of Clean Streets and Climate Change.

7. RISK MANAGEMENT

- 7.1 The main risks associated with the details included in this report are:

- Not adopting the Street Cleansing Policy thus no accepted service standards for this function

- 7.2 This risks are being managed as follows:

Risk Register: *Street Scene & Community*

Key Objective Ref No: 4

Key Objective: *Develop and Maintain and high performing, effective and efficient street cleansing service*

8. CUSTOMER IMPLICATIONS

- 8.1 Should Members choose to approve and acknowledge the Street Cleansing Policy as an accepted standard of service functions; this document will be freely available on the Council Website.
- 8.2 Any other future service specific information produced will also contain reference to this policy and the standards mentioned within it.
- 8.3 The acceptance of this policy will contribute to the enhanced understanding of our customers and stakeholders in the services we provide, this manages expectations and clearly defines responsibilities.
- 8.4 The Customer Service Centre will be advised of the new policy and directed to its location on the internet should they require the information contained within it.

9. EQUALITIES AND DIVERSITY IMPLICATIONS

- 9.1 This report has no implication on the Councils Equalities and Diversity Policies.

10. VALUE FOR MONEY IMPLICATIONS

- 10.1 This report has no impact on the corporate VFM action plan.

11. OTHER IMPLICATIONS

Procurement Issues:	None
Personnel Implications:	None
Governance/Performance Management:	None
Community Safety including Section 17 of Crime and Disorder Act 1998:	None
Policy:	Proposed Street Cleansing Policy Only
Environmental:	The recommendations of this report will contribute towards enhanced environmental performance of the Council

12. OTHERS CONSULTED ON THE REPORT

Portfolio Holder	Yes
Chief Executive	
Executive Director - Partnerships and Projects	Yes at CMT
Executive Director - Services	Yes at CMT
Assistant Chief Executive	Yes at CMT

Head of Service	Yes at CMT
Head of Financial Services	Yes at CMT
Head of Legal, Equalities & Democratic Services	Yes at CMT
Head of Organisational Development & HR	Yes at CMT
Corporate Procurement Team	No

13. WARDS AFFECTED

All Wards

14. APPENDICES

Appendix 1 Draft Street Cleansing

15. BACKGROUND PAPERS

None

CONTACT OFFICER

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Tel: (01527) 881703

Street Cleansing Policy

Street Scene and Waste Management
2008

DRAFT



Bromsgrove
District Council
www.bromsgrove.gov.uk



STREET CLEANSING POLICY

SECTION ONE

SWEEPING OF STREETS, ROADS & OTHER SPECIFIED AREAS

1. Areas requiring sweeping can be reported through the CSC
2. The Service operates 5 days a week for 365 days of the year, with a minimal cleansing coverage on Saturday and Sundays in Bromsgrove Town only.
3. There are no out of hours arrangements for this service.
4. The District is divided into zones and these are cleaned to ensure the land is, so far as is practicable, kept clear of litter and refuse to grade A standard as laid out under the Environmental Protection Act (1990, COPL& R see appendix 2).
5. High usage areas (e.g. the town centre) are cleaned daily. Other areas (e.g. roads that the service is responsible for) are cleaned 4 times a year.
6. Mechanical sweeping of the road and footpaths is undertaken routinely on a 13 week schedule.
7. Mechanical sweepers are used to cleanse relevant road and footpaths. Detritus and litter is removed from surfaces to prevent the build up of material in road channels and to prevent road gullies becoming silted.
8. Special arrangements may be implemented during times of heavy leaf and blossom fall or extreme weather conditions where additional strain may be placed on the service.

SECTION TWO

LITTER PICKING

1. Areas requiring litter picking can be reported through the CSC.
2. Litter picking is undertaken on areas of relevant land where mechanical sweepers are impractical.
3. Litter picking activities are co-ordinated with grounds maintenance operations to ensure the unnecessary spread of litter.
4. Where an area cannot safely be litter picked or where the levels of litter are excessive, the Cleansing Supervisor will arrange for the necessary procedures to be implemented for example scheduling for temporary traffic management arrangements under Chapter 8 etc.
5. Where Syringes and Needles are identified by the operative, safe working practise will be followed to ensure they are safely picked up and placed in a sharps box for disposal in the appropriate manner.

STREET CLEANSING POLICY

SECTION THREE

LITTER BINS

1. The service will aim to provide litter bins in all appropriate public places under BDC control.
2. Litter bins are emptied routinely throughout the working week, should bins require an additional empty, residents can report this to the CSC and this will be scheduled for emptying dependent upon the urgency of the incident.
3. Bins are emptied routinely and repaired or replaced as necessary.
4. Requests for the provision of new Litter bins will be evaluated and where found to be justifiable, they will be added to a priority list; the priority list will then be actioned where funding allows.

SECTION FOUR

DEAD ANIMALS

1. Dead animals can be reported through the CSC.
2. Where dead animals are reported to the Street Cleansing Service these will usually be removed within 1 day of the incident being recorded.
3. Some animals that have been involved in road kill situations on public highways or on land that is easily accessible to the public will be removed by this service. This is not intended for the removal of dead animals from a dwelling or for small rodents.

SECTION FIVE

FLY-POSTING

1. Incidents of Fly-Posting should be reported through the CSC.
2. Where Fly-posting is reported to the Street Cleansing Service it will be investigated usually within 2 days.
3. All incidents of fly posting are removed unless permission has been granted by County Council or the local authority.

STREET CLEANSING POLICY

SECTION FIVE

DOG FOULING

1. Dog Fouling incidents can be reported through the CSC.
2. Where dog waste is reported to the Street Cleansing Service, this will be investigated usually within 2 days.
3. Priority for clean up will be given to frontage of schools (and 50m leading up to the entrance), play areas and areas with high pedestrian traffic.
4. Dog Waste Bins (DWB's) are supplied for the disposal of dog faeces only. Dog owners must use these facilities where their dog fouls in a public space. The owner must use caution when using the bins and should report full or faulty bins through the Customer Service Centre.
5. Bins are emptied routinely and repaired or replaced as necessary.
6. Requests for the provision of new DWB's will be evaluated and where found to be justifiable, they will be added to a priority list; the priority list will then be actioned where funding allows.

SECTION SIX

GRAFFITI

1. Incidents of illegal graffiti can be reported through the CSC.
2. Where illegal graffiti is reported to the Street Cleansing Service it is investigated usually within 2 days
3. Obscene or Offensive Graffiti on Council owned property and surfaces will be removed within 1 week. Where graffiti is not offensive, it will be removed as part of the routine cleansing schedule.
4. Bromsgrove District Council do not remove graffiti from private property
5. Where graffiti is located on County Council or local housing authority property BDC will inform them so that they can take action.
6. Where appropriate, photographic evidence of graffiti incidents will be taken. This may be used in the identification of offenders through any identifiable "tags" and this information may be shared with other agencies such as the Police or the Community Safety Team.
7. It should be noted there are incidents of permitted graffiti within the district where arts projects have utilised this form of decoration to deter other obscene or offensive graffiti being illegally applied. Permitted Graffiti Areas are:
 - a. St Chads Rubery Skate Park
 - b. Sanders Park Skate Park
 - c. Charford Recreation Park

STREET CLEANSING POLICY

SECTION EIGHT

FLY-TIPPING

1. Incidents of fly-tipping can be reported through the CSC.
2. Where fly-tipping is reported to the Street Cleansing Service it will be investigated usually within 2 working days.
3. All fly-tipping will usually be removed within 4 working days. Where specialist equipment or specialist service need to be brought in to action a safe clean up, these timescales may differ accordingly.
4. All fly-tipping offences are recorded on Flycapture to allow direct reporting of incidents to Defra and the Environment Agency.
5. Where regular fly-tipping offences are recorded, the Street Cleansing service may consider the use of appropriate measures to prevent further offences or to gather further evidence as to the perpetrator of the crime.

SECTION NINE

EMERGENCY RESPONSE

1. Where street cleansing incidents are reported that require an immediate response, the Hit Squad will attend to the incident.
2. Where reported incidents can be dealt with immediately, the Hit Squad will do so. Where the incident requires additional staff, specialised equipment or other resources, the incident will be dealt with as soon as the appropriate resources are in place. Where the incident may pose a danger to members of the public or staff, the Hit Squad will secure the area until any danger posed by the incident has been removed.

SECTION TEN

ABANDONED VEHICLES

1. Incidents of abandoned vehicles can be reported through the CSC.
2. Where an abandoned vehicle is reported to the Street Cleansing Service, it will be investigated usually within 24hrs.
3. There is no true definition of an abandoned vehicle but the following can indicate that it may be abandoned: No valid tax, flat tyres, broken windows, no number plate, mould and weeds growing on the vehicles.
4. Under Section 3 of the Refuse Disposal (Amenity) Act 1978 and The Clean Neighbourhoods and Environment Act 2005, abandoned vehicles on any public land, land in the open air, or on any other land forming part of a highway in Bromsgrove District will be removed.
5. The registered owner of the vehicle will be sent a 7 day notice letter to advise of the situation and they may recover the vehicles at cost.

STREET CLEANSING POLICY

SECTION ELEVEN

MONITORING STREET CLEANLINESS

1. Local Environmental Quality and the effectiveness of current street cleansing frequencies are monitored using the method prescribed by National Indicator 195. This indicator has been developed to measure the cleanliness of the local environment, as a member of the public would see it.
2. Grades of cleanliness are recorded by measuring representative transects within the district. 300 transects are required every 4 months to give an annual rating for Litter, Detritus, Graffiti and Flyposting.
3. Grades from A – D are used to grade each transect, those areas of land that receive less than a B grade are used in calculating the percentage of land that is below an acceptable standard of cleanliness.
4. Should annual grades identify an increase in transects of an unsatisfactory standard, the current schedules for cleansing will be reviewed and amended to reflect actual requirements.

SECTION TWELVE

WORKING WITH OTHER DEPARTMENTS & ORGANISATIONS

1. In responding to reported incidents or scheduled works, should drug related litter, (or other that may present as a hazard) be identified, this information will be shared with other colleagues.
2. Street Cleansing will also share information with other departments including Legal Services, Planning & Environmental Health. This is primarily to investigate into environmental crimes (flytipping etc) and identify the perpetrator of the crime.
3. Where possible, the service will support community groups and Parish Councils to enhance the removal of litter from their environments; this will usually take the form of loaned equipment for community litter picks.

SECTION TWELVE

SERVICE REQUESTS, COMPLIMENTS OR COMPLAINTS

Residents wishing to make service requests, compliments or complaints should either:-

- **telephone** the Customer Service Centre on 01527 881288
- **email** by sending a message to: worcestershirehub@bromsgrove.gov.uk
- **write to**: Bromsgrove District Council, Burcot Lane, Bromsgrove, B60 1AA

APPENDIX 1 – DEFINITIONS

STREET CLEANSING POLICY

CHANNEL	That edge of the road carriageway surface abutting the kerb of the footway, which is designed to channel water into drainage gullies
COPL & R	The Code of Practice on Litter and Refuse, issued under Section 89 of the Environmental Protection Act 1990. It contains the core criteria for assessing grades for litter and detritus
DETRITUS	Detritus comprises dust, mud, soil, grit, gravel, stones, rotted leaf and vegetable residues, and fragments of twigs, glass, plastic and other finely divided materials. Note - Detritus includes leaf and blossom falls when they have substantially lost their structure and have become mushy or fragmented.
FLYCAPTURE	National reporting database for all Local Authorities.
FLY POSTING	Flyposting is defined as any printed material and associated items remains informally or illegally fixed to any structure. It includes any size of material from small stickers up to large posters
FLY TIPPING	A single plastic sack of rubbish would constitute fly-tipping rather than fall under the term litter.
GRAFFITI	Any informal or illegal marks, drawings or paintings that have been deliberately made by a person or persons on any physical element comprising the outdoor environment
LITTER	The offence of "leaving litter" (section 87 of the environmental protection act 1990) states that if a person drops, throws, deposits or leaves anything so as to cause defacement in a public place, they could be committing a littering offence. Common types of litter are cigarette ends and materials associated with eating and drinking
RELEVANT LAND	Land which is under the direct control of the Authority and to which the public are entitled or permitted to have access
SPECIFIED AREAS	Public highway Car Parks Areas around recycling banks Public open spaces Flower beds

STREET CLEANSING POLICY

Environmental Protection Act of 1990 Code of Practice on Litter and Refuse. According to the Act, there are four grades of cleanliness. These are defined as:

GRADE A : no litter or refuse

GRADE B : predominantly free of litter and refuse apart from some small items

GRADE C : widespread distribution of litter and refuse with minor accumulations

GRADE D : heavily littered with significant accumulations.

Grade A is the standard which a thorough conventional sweeping/litter-picking would achieve. Whilst Grade A is the aim, it is not reasonable to expect that standard to be maintained at all times. A few items on a Grade A surface will not necessarily be sufficient to degrade that area to Grade B. Refer to Appendix 4 for photographic reference.

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STREET CLEANSING POLICY

Litter

The photographs below identify the standard used for assessing street cleanliness for litter within the district. These standards are those laid out as per Defra guidelines. Intermediate grades are determined by the assessor using the below standards as reference points.

Grade A



Grade B



Grade C



Grade D



Detritus

STREET CLEANSING POLICY

The photographs below identify the standard used for assessing street cleanliness for detritus within the district. These standards are those laid out as per Defra guidelines. Intermediate grades are determined by the assessor using the below standards as reference points.

Grade A



Grade B



Grade C



Grade D



STREET CLEANSING POLICY

The photographs below identify the standard used for assessing street cleanliness for flyposting within the district. These standards are those laid out as per Defra guidelines. Intermediate grades are determined by the assessor using the below standards as reference points.

Grade A

No Flyposting

Grade B



Grade C



Grade D



Graffiti

STREET CLEANSING POLICY

The photographs below identify the standard used for assessing street cleanliness for graffiti within the district. These standards are those laid out as per Defra guidelines. Intermediate grades are determined by the assessor using the below standards as reference points.

Grade A

No Graffiti

Grade B



Grade C



Grade D



APPENDIX 3– SERVICE STANDARDS FOR LITTER ZONES

STREET CLEANSING POLICY

Zone 1 (Primary Retail areas)

- Clean by 8am each morning;
- Back to clean from “predominantly free of litter” within 6 hours;
- Back to clean from “widespread distribution of litter” within 3 hours;
- Back to clean from “heavily littered” within 1 hour.

Zone 2 (Car parks, industrial areas and High density housing)

- Back to clean from “predominantly free of litter” within 12 hours;
- Back to clean from “widespread distribution of litter” within 6 hours;
- Back to clean from “heavily littered” within 3 hours.

Zone 3 (Housing estates, recreational land)

- Back to clean from “predominantly free of litter” within 2 weeks;
- Back to clean from “widespread distribution of litter” within 12 hours;
- Back to clean from “heavily littered” within 6 hours.

Zone 4 (All other areas)

- Back to clean from “predominantly free of litter” within 2 weeks;
- Back to clean from “widespread distribution of litter” within 1 week;
- Back to clean from “heavily littered” within 60 hours.

If you require this document in large print, Braille, CD
or audio tape please contact:

Customer Service Centre

Telephone: 01527 881288

Or e-mail

worcestershirehub@bromsgrove.gov.uk

Need help with English? Ethnic Access Link Tel: 01905 25121

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01905 25121 سے رابطہ کریں ٹیلیفون:

BROMSGROVE DISTRICT COUNCIL

CABINET

03 DECEMBER 2008

SEPTEMBER (QUARTER 2) INTEGRATED FINANCE & PERFORMANCE REPORT

Responsible Portfolio Holder	Councillor Mike Webb Cabinet member for Performance Councillor Geoff Denaro Cabinet Member for Finance
Responsible Head of Service	Hugh Bennett Assistant Chief Executive Jayne Pickering, Head of Financial Services

1. SUMMARY

To report to Cabinet on the Council's performance and financial position at 30th September 2008 (period 6, quarter 2).

2. RECOMMENDATIONS

- 2.1 That Cabinet notes that 44% of PI's for which data is available are Improving or Stable.
- 2.2 That Cabinet notes that 82% of PI's for which data is available are achieving their Year to Date target.
- 2.3 That Cabinet notes that 92% of PI's for which data is available are predicted to meet their target at year end.
- 2.4 That Cabinet notes the successes and areas for potential concern as set out in the 'Council summary' below.

3. BACKGROUND

- 3.1 This is the second integrated quarterly finance and performance report for 2008/09. In the first report the performance element was revised to reflect the introduction of the new 'National Indicator' set which replaced the former Best Value Performance Indicator set on 1st April.
- 3.2 Following a recommendation in the review of the Data Quality Strategy by Internal Audit this report will now include a regular section to report on data quality issues.
 - There continues to be some errors in reporting of performance in Departmental submissions as follows :-
 - Planning & Environment – 3 errors in reporting
 - Human Resources – 1 error in reporting.

3.3 Three of these errors were in the coding of the target/trend information – i.e. incorrect traffic lighting and/or incorrect reporting as to whether performance is improving, stable or declining or simply transposition of numbers; one was submission of an incorrect figure. All of these were identified by checks applied at the corporate level and quickly resolved. The relevant Departmental Performance Champions have been notified and advised.

4. PROGRESS IN THE QUARTER

4.1 An integrated performance and finance report for each department, plus a council summary, is shown on the following pages.

4.2 The 44% figure for PI's improving or stable is worthy of further explanation. There are 14 PI's where performance has worsened in September compared to August. However many of these the performance decline has only been slight and 13 of these were still meeting their year to-date target and are still projected to meet year end target. Thus this lower than usual figure is not, at this stage, a cause for concern.

4.3 Areas for potential concern include

- Sickness absence figures remain worse than target and at current rates the year end target will be missed by a considerable amount. The Assistant Chief Executive has held a performance clinic to identify if any further measures can be taken to bring this down. As a result of the Performance Clinic it has been agreed that a report will be put together for December's PMB providing background analysis on age and nature of workforce and issues associated with that. The report will also discuss the Active Health Partners budget bid which was scored as "medium" priority by CMT, along with examples of longer term issues from the LGE list of good practice, like home working, health insurance etc. so that we can move the debate onto being an employer of choice, as well as tackling consistent offenders.
- Time taken to process benefit claims has worsened again. The main reason for this is vacancies in the team. A new system, Voice Recognition Analysis, funded by DWP, is being piloted which it is hoped will enable fast tracking of a number of claims and thus improve the performance on this indicator from November onwards.
- Speed of processing of all types of planning applications has declined, with performance on "other" planning applications now more than 10% off target. This has primarily been as a result of two members of staff leaving within the quarter, one of whom also had a period of sick leave prior to his departure. Interviews were undertaken to replace both individuals and positions were offered but rejected due to the uncertainty over job evaluation. Both posts are currently being re-advertised. In the meantime, the Development Control Unit has increased the level of work undertaken by the Planning Consultant to concentrate on improving the performance level in the "other" category, enabling case officers to concentrate on the "minor" category.

4.4 Financial Position

Overall Council Summary	Quarter 2 (Sept 30th) 2008/09
--------------------------------	--------------------------------------

Performance Summary

No. of PI's improving (I)	19	No. of PI's meeting YTD target	24	No. of PI's where est. outturn projected to meet target	27
No. of PI's Stable (S)	10	No. of PI's missing YTD target by < 10%	2	No. of PI's projected to miss target by < 10%	1
No. of PI's worsening (W)	0	No. of PI's missing YTD target by >10%	2	No. of PI's projected to miss target by >10%	0

Achievements

The Council has had another strong six months in terms of its performance with the vast majority of its indicators achieving or exceeding their targets. Notable achievements against our priorities include:-

- The percentage of household waste reused, recycled or composted, which is consistently over 45% each month;
- Exceeding our affordable housing target (74 units built in the first 6 months against a target of 60).
- Missed refuse collections being consistently under target for quarter 2, with a reduction in calls on this issue to the customer service centre.
- Very good performance at the customer service centre, with the resolution at the first point of contact being consistently above 95%, when the target is 85%. The percentage of calls answered was also better than target for the second quarter, the average was 25 seconds (target is 30 seconds).

We also received our second customer panel (satisfaction) results, which enabled us to track satisfaction levels against last year's baseline. There were some very strong improvements in the levels of satisfaction including:-

- A 13 percentage point rise in the satisfaction with clean streets and recycling (which reflects the increased investment in street cleansing).
- A 29 percentage point rise in the ease of contacting the Council (83%, up from 54% one year ago).
- A 20 percentage point rise in residents finding "Together Bromsgrove" useful or very useful.

We also maintained our high percentage of 73% for residents who would recommend the customer service centre to a friend.

These satisfaction and perception measures will become more important as Comprehensive Performance Assessment is replaced by Comprehensive Area Assessment and the Government focuses on addressing why resident satisfaction in public services has not improved nationally, despite the increased investment levels.

Issues

There have been a number of performance issues in the second quarter. Areas of concern include:-

- Sickness absence, which after an excellent first quarter, has increased dramatically during quarter 2. The Assistant Chief Executive and Head of HR&OD held a performance clinic during October to look at this issue and a report will be coming to December's Performance Management Board on options for addressing this issue.
- The time take to process benefits claims has also started to creep upwards and by September was 2.5 days above target. The Assistant Chief Executive and Head of Financial Services are due to hold a performance clinic to look at this issue.
- There has also been some variation in the planning indicators in quarter 2 caused by staff turnover resulting from the job evaluation results. We have been able to recruit to the vacancies and expect performance to increase to its high levels in quarter 3.
- Although not an indicator, the Council has held a number of focus groups on customer access. These focus groups indicate that, while we are now getting the basics right, we have some way to go in order to address some of the more difficult customer issues we face.
- Sports centre usage is below target, due to the refurbishment at the Dolphin Centre, but we expect usage levels to substantially increase once the new gym facilities are open.

We were also disappointed that satisfaction with our parks and events offer fell year on year in the Customer Panel survey, but we think this reflects the timing of the survey (before the summer holidays and events like street theatre). We intend to run the survey in September next year.

Finally, the Council has improved its performance levels significantly over the last two years, but we are beginning to see a levelling off of performance. In order to keep on improving we need to start redesign services projects like the Joint CEO, lean systems work and measuring avoidable contacts.

Revenue Budget summary

Service Head	Revised Budget £'000	Profiled Budget YTD £'000	Actual spend YTD £'000	Variance to date £'000	Projected outturn £'000	Projected variance £'000
Corporate Services	886	555	548	-7	864	-22
E-Government & Customer Services	64	788	798	10	51	-13
Financial Services	1,567	575	585	10	1,542	-25
Legal, Equalities & Democratic Services	922	914	844	-70	895	-28
Human Resources & Organisational Development	94	291	216	-75	114	20
Planning & Environment Services	5,531	910	718	-192	5,588	57
Street Scene & Community	8,071	2,227	2,509	281	8,348	277
SERVICE TOTAL	17,136	6,261	6,218	-43	17,402	267
Interest on Investments	-408	-245	-618	-373	-893	-486
COUNCIL SUMMARY	16,728	6,016	5,600	-416	16,509	-219

Financial Commentary

The Council is operating close to its financial targets across most areas for the period to September. However, some of the under spends reflected in departments relate to further efficiency/negotiated savings made in areas such as business rates and insurance. As these are corporate in nature they will not be available for departments use to offset alternative expenditure and will be returned to a corporate budget as part of a revised budget exercise due imminently during the Medium Term Financial Plan process

The projected outturn shows the major pressures arise mainly in Street Scene and Community. This is due to the delay in the transfer of the sports centres to the Leisure Trust together with a projected shortfall on car parking income and increased costs relating to the improved travel concessions scheme. These pressures are identified as part of the draft Medium Term Financial plan to be considered for inclusion in the 2009/10 budget.

The current projected outturn for net cost of services is anticipated to be an over spend of £267k. This will be offset by the additional income generated from investments of £486k. This is presented later in this report and is mainly due to the rescheduling of the capital programme resulting in more funds available for investment together with the external management of a proportion of our funds that has created capital increase over the period. The revised net position would be an under spend of £219k.

Capital Budget summary April-Sept 2008

Department	Revised Budget £'000	Actual spend YTD £'000	Projected outturn £'000	Projected variance £'000
Corporate Services	0	0	0	0
E-Government & Customer Services	4,413	69	4,410	(3)
Financial Services	34	1	34	0
Legal, Equality & Democratic Services	120	14	120	0
Planning & Environment (inc Housing)	2,168	670	2,169	1
Street Scene and Community	2013	269	2021	23
Budget for Support Services Recharges	130	0	130	0
TOTAL	8,878	1,023	8,884	21

Financial Commentary

The revised Capital Programme as approved in September reflects a more accurate profile of the Councils capital spend over the first half year. The Spatial project is now in its final stages with the majority of the expenditure to be met in November 08. The Asset Management Group monitor the Capital Programme on a monthly basis together with HOS and service accountants to ensure the projects are delivered on time and within budget.

Performance Summary

No. of PI's improving (I)	6	No. of PI's meeting YTD target	13	No. of PI's where est. outturn projected to meet target	14
No. of PI's Stable (S)	4	No. of PI's missing YTD target by < 10%	1	No. of PI's projected to miss target by < 10%	1
No. of PI's worsening (W)	4	No. of PI's missing YTD target by >10%	1	No. of PI's projected to miss target by >10%	0

Achievements

The running of the expanded events programme over the summer period with new locations across the district.

The success of the Community Safety & Sports development summer diversionary programme utilising the Council's investment in youth facilities.

The implementation and completion of four new play facilities across the district and the offer of 50K grant funding from the DCSF for further play improvements.

The commencement of the phase 2 refurbishment works at the Dolphin Centre to improve the on site health & fitness provision.

Grounds Maintenance and Cleansing crews targeting the town centre working with members to improve the visual aspect of the High Street and surrounding roads.

Refuse collection calendars produced giving information on the new chargeable green waste service.

Systems in place to deal with the payments for the green waste service working together with CSC and front of house.

Customer complaints reduced by 50%

Issues

The worsening position in relation to Violent Crime.

The poor usage figures at the Sports centre over the summer period and lower than forecast income generation.

Concern that the residents will leave paying for the green waste service until the last minute causing a backlog of payments to process.

Revenue Budget summary

Service Head	Revised Budget £'000	Profiled Budget YTD £'000	Actual spend YTD £'000	Variance to date £'000	Projected outturn £'000	Projected variance £'000
Community Safety	713	265	296	31	698	-15
Parks & Recreation	664	122	142	20	669	5
Promotions	329	106	170	64	396	67
Sports Centres	618	202	270	68	756	139
Sports Development	572	72	53	-19	562	-10
Streets & Grounds	2,315	577	591	14	2,268	-47
Car Parks	-787	-463	-428	35	-690	97
Depot Misc	-16	336	230	-106	-173	-157
SS&C Mgt/admin	0	192	220	28	11	11
Transport & Waste	3,227	603	736	133	3,319	92
Travel Concessions	436	216	227	11	521	85
Waste Policy	0	0	2	2	11	11
TOTAL	8,071	2,227	2,509	281	8,348	277

Financial Commentary

- The projected overspend for Community Safety relates to an expected increase in equipment maintenance costs; these are slightly offset by an expected increase in income. There are also reduced staffing costs due to post movements.
- Projected overspend on Promotions relates to ongoing costs of the Museum.
- Sports Centres projected overspend relates to non achievement of the savings as a result of the delay of the Trust transfer.
- Sports Development projected under spend relates to the new Sports Development Offices being in post for only 10 months in this financial year.
- Car park income is showing a projected reduction, due to a national footfall reduction of 1.5% reflecting current economic and fuel conditions. The remaining shortfall is a combination of the reduction in use due to the price increase, the trend results in a reduction in ticket sales of 4% in the first year.
- Travel concessions overspend is due to an increase in claims together with historic claims being made by operators that were not anticipated.

Capital Budget summary April-Sept 2008/09

Service	Revised Budget £'000	Actual spend YTD £'000	Projected outturn £'000	Projected variance £'000
Cemeteries	7	0	7	0
Community Safety	164	4	164	0
Parks, Play areas & Open Spaces	339	134	339	0
Leisure Centres	713	130	720	7
Culture and Community General	126	110	126	0
Replacement Vehicles	599	139	600	1
Site works	65	0	65	0
TOTAL	2,013	517	2,021	8

Financial Commentary

- The continuation of the 10 year Vehicle Replacement Programme across the service, many vehicles already delivered, including new vans / tipper trucks for cleansing, garage, highways, and grounds, and new mowers and equipment for grounds, and the service has been working with procurement to ensure best value, further vehicles delivered in October.
- Community safety CCTV scheme is progressing expenditure expected in October / November.
- Parks and Play area's Big lottery funded schemes, Alvechurch youth scheme, and King George V Playing fields.
- Dolphin centre work continues to be completed by April 2009, with a projected final bill of £720k, an additional report has been submitted requesting approval for expenditure on equipment for the new fitness suite.

Performance Summary

No. of PI's improving (I)	1	No. of PI's meeting YTD target	4	No. of PI's where est. outturn projected to meet target	5
No. of PI's Stable (S)	0	No. of PI's missing YTD target by < 10%	0	No. of PI's projected to miss target by < 10%	0
No. of PI's worsening (W)	4	No. of PI's missing YTD target by >10%	1	No. of PI's projected to miss target by >10%	0

Achievements

The Department as a whole has maintained strong performance throughout the quarter. The Department Management team undertook an "Away Day" to discuss the 2009/10 Business Plan and forthcoming budget bids and those are currently feeding through the budget cycle. Additionally the CAPS UNIFORM and ICLIPSE software systems have been rolled out across the Department as part of the Spatial Project. That has involved significant officer time undertaking appropriate training and relevant deadlines have been met. Staff consultation with regard to the impact of the Department restructure was undertaken throughout September with the aim of presenting the Review to CMT in October and Cabinet in November.

Environmental Health Officers have responded to the Food Standards Agency audit Inspection with an action plan which has been endorsed by the FSA and Cabinet.

Strategic Housing

The Council's support of and partnership working with Bromsgrove Youth Homelessness Forum and BDHT has lead to the CLG making us West Midlands Regional Centre of Excellence for Youth Homelessness. Additionally final training and local directory of access, step by step guide and application inputting for Choice Based Letting has been on going in preparation for going live date of 7th October.

Within the Building Control Section a BSI 9002 major unannounced 3 year strategic audit was carried out by external assessors. There was a successful outcome with no non-conformities raised for the first time in 8 years and accordingly accreditation was re-awarded.

Work on the Town Centre Area Action Plan was carried out throughout the quarter with staff attending Street Theatre and Farmers Markets events. The response rate has been very high and work will take place in October to assess the consultation response.

Performance within Development Control has been affected by sickness absence and staff leaving. Nevertheless performance for the quarter was as follows:

Major = 71%

Minor = 60%

Other = 88%

Issues

The roll out of the Spatial project throughout the quarter has impacted on officer time and therefore sections have been proactively managing their work streams to ensure performance remains at an acceptable level. This is an issue that is regularly discussed at the Department Management Team meetings and issues are escalated when necessary. Staff recruitment and retention remains an issue with two further Development Control staff leaving in the quarter. Interviews for replacements were undertaken and posts were offered but rejected on the basis of the uncertainty surrounding Job Evaluation. The acceptance of the restructure proposals will assist in managing this issue.

Revenue Budget summary

Service Head	Revised Budget £'000	Profiled budget YTD £'000	Actual spend YTD £'000	Variance to date £'000	Projected outturn £'000	Projected variance £'000
Building Control	17	-48	-62	-14	14	-3
Development Control	908	117	19	-98	835	-73
Environmental Health	997	287	228	-59	968	-29
Licensing	-4	-10	-46	-36	-35	-31
Planning Administration	-8	51	94	43	104	112
Strategic Housing	3,103	329	335	6	3,155	52
Strategic Planning	354	116	84	-32	335	-19
Economic Development	114	58	54	-4	118	4
Retail Market	50	10	12	2	94	44
TOTAL	5,531	910	718	-192	5,588	57

Financial Commentary

- The current under-spends are due to a number of vacancies within the department that of which some have recently been filled resulting in a reduced underspend by the year end. The remainder of vacant posts will be reviewed as part of a wider Departmental Review that is looking into efficiencies and savings as part of the three year financial plan.
- It is projected there will be an overspend of 57k by the end of the financial year. This is being the net effect of the under-spends on salaries against the significant loss of income in land charges, Market Hall, the closure of the hostels and the loss of income on Pre-transfer Right to Buys (PRTB's).

Capital Budget summary April-Sept 2008/09

Service	Revised Budget £'000	Actual spend YTD £'000	Projected outturn £'000	Projected variance £'000
Strategic Housing	2,058	671	2,032	(26)
Town Centre	110	0	110	0
TOTAL	2,168	671	2,142	(26)

Financial Commentary

- Improvements in the processing of applications has increased amount of DFG's completed by the second quarter, on target to commit annual budget.
- Grants to RSL schemes – a number of schemes are under way including the provision of general need affordable housing for rent, on former hostel sites.
- Town centre – invoices for this project have been received in October and therefore not shown above.

Performance Summary

No. of PI's improving (I)	3	No. of PI's meeting YTD target	3	No. of PI's where est. outturn projected to meet target	3
No. of PI's Stable (S)	0	No. of PI's missing YTD target by < 10%	0	No. of PI's projected to miss target by < 10%	0
No. of PI's worsening (W)	0	No. of PI's missing YTD target by >10%	0	No. of PI's projected to miss target by >10%	0

Achievements

Customer Service Centre

Telephony Indicators – All key indicators have been exceeded this quarter with the continued excellent performance set against a rise in call volumes. The increase in call volume was expected towards the end of this quarter and matches previous yearly call trends.

Resolution Rates – Resolution rates across all access channels continue to exceed target with resolution at first point of contact averaging 98%.

Queue management information – During this quarter approx 7000 customers have been logged on the queue management system. The average wait time for these customers in the CSC was 7 minutes and is below the HUB performance target of 15 minutes. The average face to face customer serve time was 12 minutes an increase of one minute compared to last quarter. Both of these are within the target set for the service centre. The top service requested was Benefits with Bus Pass enquires remaining in second place.

During September all staff were trained in use of the new Choice Based Letting system which will be live in the CSC in early October. Staff will now be able to support customers who experience difficulty self serving when using the system.

The Licensing Resource Level Agreement was signed off with the appropriate Heads of Service prior to go live in October. All staff have received training in the delivery of Licensing processes prior to the service migrating to the CSC in October.

Information Communication Technology Services

In July the Citrix thin client applications were extended to include CAPS Uniform, Iclipse and Academy. This increases the levels of access to corporate systems via the thin client remote service.

The final stage of the wireless network upgrade was also carried out to improve the wireless coverage and stabilise the signal.

In August the Radius test core modules / webstaff modules and webpublic modules were upgraded to the latest versions.

The green waste database and webfront end was created and all property details uploaded. A site to site VPN connection was also established between BDC and Redditch BC.

In September the Green Waste webpages went live enabling online payment for the service.

Spatial Project

During the last quarter the following Spatial project tasks have been completed or implemented:

- The interface between Electronic document management and Land & Property Business Application is in place and live.
- Uniform training has been completed for Street Scene & Environmental Health.
- The Document Management system is now live in all departments.
- The Intranet based mapping module LocalView has been implemented.
- Graves data has been captured from ledgers and has been cleansed.
- Streetscene implementation has been scheduled and Uniform training has started.
- The public access modules that will allow our customers to access information about Scores on the Doors and Planning applications are now live.

Issues

Sickness absence levels continue to be an issue. Monitoring of the situation is taking place in conjunction with HR to establish a way of improving the situation.

Revenue Budget summary

Service Head	Revised Budget £'000	Profiled budget YTD £'000	Actual spend YTD £'000	Variance to date £'000	Projected outturn £'000	Projected variance £'000
Customer Service Centre	54	197	153	-44	37	-17
E-Government	10	591	645	54	14	4
TOTAL	64	788	798	10	51	-13

Financial Commentary

- It is projected that there will be an under spend of £13k by the end of the financial year. This is due to the net effect of the under spends on salaries against the overspends predicted on computer software and telephones.

Capital Budget summary April-Sept 2008/09

Service	Revised Budget £'000	Actual spend YTD £'000	Projected outturn £'000	Projected variance £'000
E-Government	4,413	69	4,410	3
TOTAL	4,413	69	4,410	3

Financial Commentary

- Phase I of the Spatial Project is on target and due to be paid November 2008

Financial Services	Quarter 2 (Sept 30th) 2008/09
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Performance Summary

No. of PI's improving (I)		No. of PI's meeting YTD target	2	No. of PI's where est. outturn projected to meet target	3
No. of PI's Stable (S)		No. of PI's missing YTD target by < 10%	1	No. of PI's projected to miss target by < 10%	
No. of PI's worsening (W)	2	No. of PI's missing YTD target by >10%		No. of PI's projected to miss target by >10%	

Achievements

- Statement of Accounts received an unqualified opinion by the External Auditors
- All criteria in relation to the minimum standards on Value for Money achieved
- Use of Resources self assessment completed and reviewed by Audit Commission
- Continued support to departments with the Purchase Order Processing system
- Revised Capital Programme approved by Full Council
- Commenced preparation of 2009/10 financial plan
- Awarded pilot project of Voice Risk Analysis by DWP for benefit assessments
- Successful fraud prosecutions undertaken
- Single Person discount review started
- Continued support to Redditch for procurement services
- Support to departments to develop risk registers and quarterly updates

Issues

- Slight increase in benefit claims to be monitored in light of the decline in the economy
- Slight reduction in payments made by Business Rate payers – to be monitored for impact on collection fund.
- Delays in meeting the audit plan due to staff shortages – to be delivered by employing temporary staff to cover and by using services provided by Worcester City Council

Revenue Budget summary

Service Head	Revised Budget £'000	Profiled Budget YTD £'000	Actual spend YTD £'000	Variance to date £'000	Projected outturn £'000	Projected variance £'000
Central Overheads	117	58	69	11	116	-1
Accountancy & Administration	15	252	281	29	72	57
Internal Audit	-0	63	95	32	4	4
Grants & Donations	91	46	81	35	90	-1
Revenues & Benefits	1,344	156	59	-97	1,260	-84
TOTAL	1,567	575	585	10	1,542	-25

Financial Commentary

The accountancy and audit budgets include the costs associated with the management and advice that the Council receives in relation to the investments that we hold. As detailed later in this report there is additional interest predicted of £486k which is in part due to the capital increases that have been achieved by our fund managers. The overspend in relation to the management of funds can be offset by the increase in income, in addition the advice received has ensured that the Council has not entered into any higher risk arrangements that may have jeopardised our funds. The remainder of the overspend is due to the requirement for some temporary support to cover for a senior vacancy within the audit team. Discussions are being held with other districts to identify alternative management arrangements of this service including joint working across the County.

Additional income in relation to recovery of housing benefit over payments has resulted in an underspend in revenues and benefits to offset the overspend in accountancy and audit.

Capital Budget summary April-Sept 2008/09

Service	Revised Budget £'000	Actual spend YTD £'000	Projected outturn £'000	Projected variance £'000
Finance	34	1	34	0
TOTAL	34	1	34	0

Financial Commentary

- The Purchase Order Processing system has been piloted in accountancy, E-government (including CSC), and the Revenues and Benefits section. Improvements to the system as a result of the piloted schemes is currently taking place, training to users in additional area's anticipated in December.

Performance Summary

No. of PI's improving (I)	1	No. of PI's meeting YTD target	1	No. of PI's where est. outturn projected to meet target	1
No. of PI's Stable (S)		No. of PI's missing YTD target by < 10%	0	No. of PI's projected to miss target by < 10%	0
No. of PI's worsening (W)	1	No. of PI's missing YTD target by >10%	1	No. of PI's projected to miss target by >10%	1

Achievements

The Communications, Policy and Performance Team are on target with the majority of its projects. In the second quarter the key project has been preparation for the forthcoming CPA inspection. So far, things have gone smoothly, with the next stage being the site visit, week commencing 10 November. The team have also produced key documents like the Council Plan Part 1 (and completed the survey work and performance work required for this document), which sets out the priorities for the next three years, the community strategy refresh, a new community engagement strategy and a draft performance management strategy. The communications part of the team is continuing to manage both internal and external communications to a high standard, which this year has included much more involvement from staff in determining the Council's priorities and a pilot budget jury.

Issues

While CPA is going well so far, it remains an area of concern, simply because of its importance. The latest edition of Together Bromsgrove is about to be produced, which is of high standard, but we are predicting a shortfall in advertising income against target, however, this will be contained within the Team's budget. The Team are also working towards the implementation of a community transport scheme. Whilst a small scheme, this will need to be managed carefully in the coming months, to ensure the launch (planned date 01 July 2009) is without hitch. The proposed roll out of the third Local Neighbourhood Partnership has been delayed due to the work on CPA, however, two stakeholder events are now planned for November and December, a draft terms of reference has been consulted on, and a website is being developed for the Rubery LNP and action plans developed for both LNPs. Similarly, the launch of the parish plan "adoption" scheme has been slightly delayed, but should go live in November (one month behind schedule).

Revenue Budget summary

Service Head	Revised Budget £'000	Profiled budget YTD £'000	Actual spend YTD £'000	Variance to date £'000	Projected outturn £'000	Projected variance £'000
Policy & Performance	38	196	199	3	38	0
Corporate Management	789	335	326	-9	767	-22
Corporate Projects	59	24	23	1	59	0
TOTAL	886	555	548	-7	864	-22

Financial Commentary

The Corporate Communication, Policy and Performance team has secured external funding for the post of Improvement Manager and contributions towards the costs of the Local Strategic Partnership. Whilst there may be pressure achieving the income target for Together Bromsgrove it is expected that savings elsewhere within the team's budget will adequately meet any shortfall.

The projection incorporates the cost sharing of the Joint Chief Executive post with Redditch Borough Council.

Performance Summary

No. of PI's improving (I)		No. of PI's meeting YTD target	1	No. of PI's where est. outturn projected to meet target	1
No. of PI's Stable (S)	1	No. of PI's missing YTD target by < 10%		No. of PI's projected to miss target by < 10%	
No. of PI's worsening (W)		No. of PI's missing YTD target by >10%		No. of PI's projected to miss target by >10%	

Achievements

- The Council agreed at the start of the Municipal Year to introduce mandatory training in relation to all Boards and Committees. The date by which all members needed to have achieved this standard was the end of September 2008 and this target has been met with the exception of two members and a date has been agreed for this training to be undertaken before the boards upon which they sit meet again.
- The Legal Department continues to undertake the large scale voluntary registration project both in relation to the land holding at BDC and the land holding at RBC. This enables the Council to move towards the advantages that registered land holdings will achieve for the organisation and also works towards the shared service agenda and moves towards achieving the income generation targets in the departments 2008/9 budget projections
- Through the Parish Council Forum a process for managing Public Speaking at Planning Committee has been agreed and officers have agreed to publish certificate of lawfulness applications on the website.
- The asset management plan was reviewed and updated and agreed by Cabinet.
- The office who manage the incoming and outgoing post have negotiated a new contract with the document exchange providers that have resulted in costs being reduced by 50%
- The case management system in the legal department is now live and operational and it is anticipated that the debt recovery process will now be much more streamlined and efficient. It will also assist the joint working proposals within the legal section and Redditch Borough Council
- The Standards Committee produced an Annual Standards Committee Report which was the first of its kind for Bromsgrove District Council and is a testament to the strength of this committee in the newly emerging ethical framework within the organisation and the decision making process.

Issues

- Like all Council's nationally BDC is struggling with the delivery of the 'overview' element of the Scrutiny agenda. As a result the leaders of all groups have been meeting to discuss the options that may be available in relation to the development of this area. This work continues and it is hoped that a resolution can be found to this and that a report can be taken to the Full Council meeting in October to discuss the same.

Revenue Budget summary

Service Head	Revised Budget £'000	Profiled budget YTD £'000	Actual spend YTD £'000	Variance to date £'000	Projected outturn £'000	Projected variance £'000
Administration Services	0	61	57	-4	-10	-10
Committee & Member Services	789	217	219	1	795	6
Elections & Registration	178	59	50	-9	184	6
Facilities Management	-83	380	335	-45	-114	-31
Legal Services	38	197	183	-13	40	1
TOTAL	922	914	844	-70	895	-28

Financial Commentary

- The budget for the electoral services department is and will continue to be overspent for this year. The Elections Manager post was vacant for a considerable time and as a consequence the budgets in relation the postal voting and publications was not an accurate reflection of the actual costs. It is fair to say that it is unlikely that this would have been predicted accurately in any event given the considerable changes throughout the elections period in relation to the postal voting process and the elections act generally.
- It is projected there will be an under spend for the year due mainly to savings in Facilities Management budgets for insurance and business rates.

Capital Budget Summary April-Sept 2008

Service	Revised Budget £'000	Actual spend YTD £'000	Projected outturn £'000	Projected variance £'000
Facilities Management	120	14	120	0
TOTAL	120	14	120	0

Financial Commentary

- The budget includes funding for a number of alterations at the Council House. The Asset Management Group is currently considering the use of the council house and the appropriate alterations will be made following this review.

Human Resources & Organisational Development	Quarter 2 (Sept 30th) 2008/09
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Performance Summary

No. of PI's improving (I)		No. of PI's meeting YTD target	1	No. of PI's where est. outturn projected to meet target	1
No. of PI's Stable (S)		No. of PI's missing YTD target by < 10%		No. of PI's projected to miss target by < 10%	
No. of PI's worsening (W)	1	No. of PI's missing YTD target by >10%		No. of PI's projected to miss target by >10%	

Achievements

- Supported consultation process in respect of major restructure of Planning and Environment, with minimal compulsory redundancies.
- Supported negotiations in respect of planned TUPE transfer of Leisure Centres to Wychavon Leisure Trust.
- Supported consultation process in respect of service restructure of Leisure Services following the decision of Wychavon Leisure Trust to withdraw from negotiations in respect of a TUPE transfer.
- Facilitated re-evaluation of jobs arising from service restructures
- Commenced workforce planning project
- Prepared for 3rd annual Management Conference
- Prepared for and released Staff Survey
- Conducted preliminary review of redundancy selection criteria
- Produced Service Key Deliverables for 2009/10

Issues

- Sickness absence - performance falling behind target. Being managed through Corporate Performance Clinic.
- Delayed implementation of Single Status – management intervention to achieve certainty for implementation. Report to Cabinet on 22nd October asking Cabinet to consider Options for to facilitate implementation.

Revenue Budget summary

Service Head	Revised Budget £'000	Profiled budget YTD £'000	Actual spend YTD £'000	Variance to date £'000	Projected outturn £'000	Projected variance £'000
Human Resources & Organisational Development	94	291	216	-75	114	20
TOTAL	94	291	216	-75	114	20

Financial Commentary

- There is an under-spend is on the corporate training budget and Councillors training budget – however it is anticipated that these budgets will be used fully in 08/09.
- The projected out-turn for the financial year is 19k over-spent this is due to vacancy management as the department is fully staffed also to keep a member of staff in payroll to assist Redditch in the payroll transfer.

4.5 Sundry Debtors

4.3.1 Sundry Debt is raised by the Council to ensure effective recovery of debts owing. The outstanding balance at 30/09/08 was £273k which includes:-

- £35k of car parking fines
- £18k lifeline debts
- £63k rents/ hire charges
- £10k building regulations
- £39k trade waste and cesspool emptying
- £39k Developer contributions
- £18k Housing schemes
- £15k Licensing
- And £22k in respect of services provided by the Council to other organisations (e.g. contracts with BDHT for legal work).

Of the outstanding balance only £86k has been outstanding for a period of 90 days or more, these debts are currently with the legal department for consideration and further recovery.

5.0 TREASURY MANAGEMENT

5.1 Investment Interest

5.1.1 For the period to 30 September 2008 the Council received net investment income amounting to £618k against predicted year to date receipts of £245k. This income is a combination of interest earned on in-house managed funds (cash currently surplus to cash flow requirements that is placed on short-term deposit) and the investment income arising on the externally managed funds (HSBC fund managers). The increased interest has arisen due to slippage on the capital programme which has made additional surplus cash available for deposit, combined with enhanced interest rates achieved as a result of the market conditions earlier in the year.

Due to the rescheduling of the Capital Programme for 2008/09 it is anticipated that additional funds will be available for deposit during the remainder of the financial year. The estimated position at year end is an additional £486k to that included within the budget. Due to advice received the Council is maintaining its stance of depositing in ultra low risk investments and as a result the returns predicted for the remainder of the year will be significantly lower than previously achieved.

5.1.2 Details on the fund manager's performance are detailed below.

5.2 HSBC

5.2.1 Investment Objectives/Level of Risk

The investment objective is set out in the Client Agreement with HSBC with a portfolio mandate of short maturity with a medium level of risk.

5.2.2 Portfolio Performance

At 1 April 2008 the Council's investment was valued at £11.091 million. In the period to September the investment income was £277k. Management fees applied to the portfolio for the period totalled £16k. The market value of the funds invested with HSBC was £11.470 million as at 30 September 2008 including unrealised capital gains of £118k.

6.0 EFFICIENCY SAVINGS

As part of the budget round for 2008/09 a number of efficiency savings were approved. These challenging targets were allocated across all services as detailed in appendix 5. To date there are no significant variances to report against these targets with the exception of targets relating to the payroll service. This is due to delays in implementing the transfer of the service combined with additional costs incurred in relation to job evaluation.

7.0 REVENUE BALANCES AND EARMARKED RESERVES

7.1 Revenue Balances

The revenue balances brought forward at 1 April 2008 were £2.023 million. The original budget requirement for use of balances in 2008/09 was £0.355 million. This has been increased by £0.474 million due mainly to the approved carry forward of budgets arising from specific under spends in 2007/08. Taking into account the current projected underspend of £0.219 million it is anticipated that revenue balances will equate to £1.413 million at 31 March 2009.

7.2 Earmarked Reserves

The Council maintains a number of reserves which have been set up voluntarily to earmark resources for future spending plans. The balance on these reserves is shown below.

Earmarked Reserve	Balance 1 April 2008 £000	Receipts 2008/09 £000	Currently Required 2008/09 £000	Projected Balance 31 March 2009 £000
Building Control Partnership	6	0	1	5
Planning Delivery Grant	397	368	-417	348
Replacement Reserve	536	0	0	536
Litigation Reserve	140	0	0	140
Leisure Reserve	43	0	-20	23
Total	1,122	368	-438	1,052

8. FINANCIAL IMPLICATIONS

Covered in the report

9. LEGAL IMPLICATIONS

None

10. COUNCIL OBJECTIVES

11. RISK MANAGEMENT

Covered in the report.

12. **CUSTOMER IMPLICATIONS**

13. **EQUALITIES AND DIVERSITY IMPLICATIONS**

14. **OTHER IMPLICATIONS**

Procurement Issues None
Personnel Implications None
Governance/Performance Management – subject of the report
Community Safety including Section 17 of Crime and Disorder Act 1998 None
Policy None
Environmental None

15. **OTHERS CONSULTED ON THE REPORT**

Portfolio Holder	No
Chief Executive	Yes – at CMT
Corporate Director (Services)	Yes – at CMT
Assistant Chief Executive	Yes
Head of Service	Yes
Head of Financial Services	Yes
Head of Legal, Equalities & Democratic Services	Yes
Head of Organisational Development & HR	Yes
Corporate Procurement Team	No

APPENDICES

Appendix 1	Performance Summary for September 2008
Appendix 2	Detail Performance report for September 2008
Appendix 3	Detailed figures to support the performance report
Appendix 4	Efficiency Savings 2008/09

CONTACT OFFICERS

Hugh Bennett, Assistant Chief Executive
Jayne Pickering, Head of Financial services
John Outhwaite, Senior Policy & Performance Officer

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APPENDIX 1

SUMMARY - Period 3 (June) 2008/09						
Monthly (June) performance			Estimated Outturn			
	No.	%	No.	%	No.	%
Improving or stable.	19	67%	24	86%	27	96%
Declining	10	33%	2	7%	1	4%
No data	0	0%	2	7%	0	0%
		No data		0%		0%
Total Number of Indicators	29	100%	28	100%	28	100%
		Total Number of Indicators		total		

SUMMARY - Period 4 (July) 2008/09						
Monthly (July) performance			Estimated Outturn			
	No.	%	No.	%	No.	%
Improving or stable.	14	52%	19	70%	21	84%
Declining	13	48%	6	22%	2	8%
No data	0	0%	0	0%	0	0%
		No data		7%		8%
Total Number of Indicators	27	100%	27	100%	25	100%
		Total Number of Indicators		total		

SUMMARY - Period 5 (August) 2008/09						
Monthly (August) performance			Estimated Outturn			
	No.	%	No.	%	No.	%
Improving or stable.	20	74%	20	74%	23	85%
Declining	7	26%	4	15%	1	4%
No data	0	0%	1	4%	1	4%
		No data		7%		7%
Total Number of Indicators	27	100%	27	100%	27	100%
		Total Number of Indicators		total		

SUMMARY - Period 6 (September) 2008/09						
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Ref	Description	Report - led?	Com or Sup?	2007/08		2008/09												Comments			
				Actuals	Count	June Target	June Actual	Target & Trend	July Target	July Actual	Target & Trend	Aug Target	Aug Actual	Target & Trend	Sep Target	Sep Actual	Target & Trend		2008/09 Est. Outturn	Est. Outturn Target & Trend	
Street Scene & Community																					
NI 191	Residual Household waste per household	M	C	n/a	n/a	157.50	154.12	I	203.56	200.31	W	250.35	246.07	I	297.68	295.53	W	593.00	593.00	I	Trade waste yet to come off Sep (has now been taken off Aug)
NI 192	Percentage of household waste re-used, recycled and composted	M	C	n/a	n/a	45.00	49.49	W	44.02	49.90	I	48.76	48.36	W	46.71	49.46	W	45.00	42.00	I	Trade waste yet to come off Sep (has now been taken off Aug).
LPI Depot	%age of reported abandoned vehicles investigated within 24 hours	M	C	100.00	1	95.00	96.43	S	95.00	97.22	I	95.00	97.44	S	95.00	97.67	S	95.00	97.67	I	4 vehicles reported and investigated within timescale
LPI Depot	%age of abandoned vehicles removed within 24 hours of legal entitlement	M	C	98.78	1	95.00	100.00	S	95.00	100.00	S	95.00	100.00	S	95.00	100.00	S	95.00	100.00	I	3 vehicles identified for removal and 3 removed within timescale
LPI Depot	% animal/debris cleared within timescales	M	C	100.00	n/a	95.00	100.00	S	95.00	100.00	S	95.00	100.00	S	95.00	100.00	S	95.00	100.00	I	23 dead animals reported and removed within timescale
LPI Depot	% of flytips dealt with in response time	M	C	99.46	n/a	95.00	100.00	S	95.00	100.00	S	95.00	100.00	S	95.00	100.00	S	95.00	100.00	I	123 incidents of fly tipping reported and removed within timescale
LPI Depot	Number of missed household waste collections	M	C	1102	n/a	348	294	I	464	392	W	580	484	I	696	575	I	1,400	1,018	I	91 missed refuse collections this month - 0.06% collections missed (4 weeks x 38,000)
LPI Depot	Number of missed recycle waste collections	M	C	352	n/a	150	81	I	200	99	S	250	117	I	300	138	W	600	229	W	21 missed collections - 0.01% of 144,000 collections missed (4 weeks x 36,000)
NWBCU 2	The number of domestic burglaries	M	C	355	n/a	90	65	W	120	95	W	150	138	W	180	176	I	360	331	W	Thieves continue to operate in areas bordering West Midlands. A police media campaign on awareness for residents is ongoing. Actuals were 9 over target for September, but reduction of 5 over August. This is now Tasking priority
NWBCU 3	The number of violent crimes	M	C	1093	n/a	262	282	W	352	380	I	441	470	W	527	558	I	1056	1128	I	Actual was 7 over target for September but a reduction of 8 over August actuals. Continues to be a Police priority
NWBCU 3	The number of robberies	M	C	67	n/a	14	8	I	19	15	W	23	19	I	28	25	W	60	45	I	Actual on target for September and a reduction of 1 crime over August.
NWBCU 4	The number of vehicle crimes	M	C	710	n/a	190	166	W	254	232	W	319	289	I	381	349	W	768	694	I	A slight increase of 5 actuals in September over August but still under monthly target. Awareness media campaign via Police and Partnership ongoing
LPI SC 1	Number of attendances at arts events	M	C	25,056	n/a	1,090	979	I	1,890	3,344	I	13,890	16,112	I	14,490	16,737	W	25,253	25,253	I	The attendance of art events is in line with the target
LPI SC 4	Sports Centres Usage	M	C	592,133	n/a	161,463	163,945	I	223,832	221,336	I	282,016	266,982	W	339,943	322,646	I	672,420	672,420	I	Improved month at DC due to new sessions in sports hall and pool, slightly down on target. Still low on dry side activities but new studio opening Oct so further classes can be introduced. Still losing gym members but attrition rates slowing because of

Ref	Description	Report - ed?	Com or Shap?	2007/08		2008/09		Target	Est. Outturn	Est. Outturn Target &Trend	Comments				
				Actuals	Quantile	June Actual	Target &Trend					July Actual	Target &Trend	Aug. Actual	Target &Trend
LPI SC 5	Sports development usages	M	C	18,213	n/a	4,740	5,418	6,506	7,210	8,030	8,578	9,793	10,142	I	PSP attendance down as commencement of delivery delayed due to new academic year. Figures up due to discounted swim usage.

Planning & Environment

NI 157	The percentage of major planning applications determined within 13 weeks	M	C	95.35	1	75.00	77.00	75.00	75.00	75.00	77.00	75.00	75.00	W	Major 2/3 = 66% (National indicator is 60 %). One application went over – RSPCA re-homing centre at Newbrook Farm, a small scale major scheme in terms of the recent classifications. However the application was a Departure from the development plan and had to be referred to GOWM. This caused the application to go over.
NI 157	The percentage of minor planning applications determined within 8 weeks	M	C	92.42	1	80.00	80.00	80.00	73.00	80.00	76.00	80.00	71.00	W	Minor 7/15 = 46% (National Indicator is 65%). Of the applications that went over a number were as a result of Case officer sickness, prior to that Officer leaving the Council. Two applications went over as a result of other officers picking up that workload
NI 157	The percentage of other planning applications determined within 8 weeks	M	C	93.11	1	90.00	90.00	90.00	93.00	90.00	93.00	90.00	93.00	W	Minor 7/15 = 46% (National Indicator is 65%). Of the applications that went over a number were as a result of Case officer sickness, prior to that Officer leaving the Council. Two applications went over as a result of other officers picking up that workload and combining that with the taking of annual leave. Wythall Sawmill was called to Committee for consideration by the Ward Members. Case Officers have all been reminded to be vigilant
NI 155	Number of affordable homes delivered	Q	C	46.00	4	20	50	I		40	74			W	Our target is 80 per year over 5 years. We have delivered 74 in the 1 st two quarters and are on target to deliver a total of 184 new homes unless there is slippage due to unforeseen circumstances.
NI 156	Number of households occupying temporary accommodation	Q	S	16.0	n/a	23	13	I		23.00	10.00			I	We are continuing to maintain very low number of clients in temporary accommodation. We are well below not only the government target of 34 but also well below our own target for 2008-9 of 23.
LPI	Average time (weeks) from referral to completion for category 1 DFGs	Q	C		n/a	n/a				n/a	38.00				As a result of a recommendation from Performance Management Board this, and the following four, PI has been introduced in this quarter, detailed comparisons will therefore be available from QW3 onwards. However in general terms the second quarter has seen a decline in performance due to changing priorities. The Private Sector Housing Team Leaders priorities have been redirected for a month towards the Local Authorities Spatial Project.
LPI	Average time (weeks) from referral to completion for category 2 DFGs	Q	C		n/a	n/a				n/a	51.00				see above

Ref	Description	Report - Ed7	Com or Shipt	2027/08		2026/09		2025/08		Comments									
				Actuals	Quantile	June Target	June Actual	Target & Trend	July Target		July Actual	Target & Trend	Aug. Target	Aug. Actual	Target & Trend	Sep. Target	Sep. Actual	Target & Trend	Est. Outturn
LPI GCPP01 (SS)	Number of complaints received (Council wide) Monthly. Source new complaints system.	M	C	n/a	58	n/a	97	n/a	119	n/a	129	n/a	n/a	n/a	n/a	n/a	n/a	n/a	Complaints numbers have dropped this is due to service improvements introduced within the Refuse and Recycling Teams.
LPI GCPP02 (LB)	% of PACT meetings attended by SMT members	Q	C		72.00	n/a	n/a	n/a	n/a	86.00	85.00	n/a	85.00	85.00	85.00	85.00	85.00	85.00	Two meetings were not attended due to not being informed of dates by West Mercia Police. All other meetings were attended during the quarter.
LPI CCPP03 (SS)	Number of compliments received	M	C	n/a	18	n/a	26	n/a	29	n/a	34	n/a	34	n/a	34	n/a	n/a	n/a	We need to encourage staff to put compliments onto the system

Legal, Equalities & Democratic services

LD LPI 1	The level of the Equality Standard for Local Government to which the Authority conforms	M	C	2	2	2	2	2	2	2	2	2	2	2	2	2	2	2	The Council is still gathering evidence in order to plan when to make a claim for Level 3. Our current target for Level 3 is March but by then the Standard will have been superseded by the Equalities Framework which has a different structure to the Standard and reduces the current 5 levels to 3. Under the Framework we would be aiming at Level 2 (which is the equivalent of the current Level 3). This transition still needs some analysis and discussion because the structure of the Framework is not like for like to the Standard - the evidence we have collected would need to be re-analysed and restructured to the new Levels and 5 blocks of achievement (as opposed to 4 blocks under the Standard)
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Human Resources and Organisational Development

LPI (formerly BV12)	The average number of working days lost due to sickness.	M	C	9.35	2	2.13	1.92	2.84	4.04	5.01	4.26	6.75	10.05	6.75	10.05	6.75	10.05	6.75	Whilst the overall sickness for September was marginally lower than August we remain red on the traffic light system for sickness absence performance management with the projected out-turn figure for the year now standing at 10.04 (based upon accumulated figures within the performance year to date) against a year-end target of 8.75 days per full-time equivalent. A performance clinic is to be arranged by the Assistant Chief Executive.
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Ref	Description	Freq	C or S	2008/09 Monthly Performance figures											
				Apr.	May.	Jun.	Jul.	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.

Street Scene & Community

NI 191	Residual Household waste per household	M	C	Target	50.80	105.00	52.50	50.10	46.79	49.57								
				Actual	50.80	52.75	48.87	55.71	49.03	53.16								
NI 192	Percentage of household waste re-used, recycled and composted	M	C	Target	45.00	45.00	45.00	44.02	47.14	45.08								
				Actual	46.23	49.50	49.49	47.03	45.71	46.68								
NI 195	Improved street & environmental cleanliness - graffiti	M*	C	Target	na	na	na	na	na	na								
				Actual	na	na	na	na	na	na								
NI 195	Improved street & environmental cleanliness - litter	M*	C	Target	na	na	na	2.00	na	na								
				Actual	na	na	na	na	na	na								
NI 195	Improved street & environmental cleanliness - detritus	M*	C	Target	na	na	na	6.00	na	na								
				Actual	na	na	na	na	na	na								
NI 195	Improved street & environmental cleanliness - fly posting	M*	C	Target	na	na	na	16.00	na	na								
				Actual	na	na	na	na	na	na								
NI 196	Improved street and environmental cleanliness - fly tipping	M	C	Target	na	na	na	0.00	na	na								
				Actual	na	na	na	na	na	na								
LPI depot	%age of reported abandoned vehicles investigated within 24 hours	M	C	Target	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00
				Actual	87.50	100.00	100.00	100.00	100.00	100.00								
LPI depot	%age of abandoned vehicles removed within 24 hours of legal entitlement	M	C	Target	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00
				Actual	100.00	100.00	100.00	100.00	100.00	100.00								
LPI Depot	% animal/debris cleared within timescales	M	C	Target	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00
				Actual	100.00	100.00	100.00	100.00	100.00	100.00								
LPI Depot	% of flytips dealt with in response time	M	C	Target	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00	95.00
				Actual	100.00	100.00	100.00	100.00	100.00	100.00								

LPI Depot	Number of missed household waste collections	M	C	Target	116	116	116	116	116	116	116	116	116	116	116	116	116	116	116	116		
				Actual	104	123	67	98	116	93	91											
LPI Depot	Number of missed recycle waste collections	M	C	Target	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	50	
				Actual	35	28	18	18	17	21												
LPI	The number of domestic burglaries	M	C	Target	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	30	
				Actual	21	20	24	30	44	39												
LPI	The number of violent crimes	M	C	Target	88	89	86	89	89	89	89	86	86									
				Actual	89	92	101	98	101	93												
LPI	The number of robberies	M	C	Target	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	5	
				Actual	3	3	2	7	4	5												
LPI	The number of vehicle crimes	M	C	Target	64	65	62	65	65	65	65	62	62									
				Actual	49	37	64	65	56	61												
LPI Community Services	Number of attendances at arts events	M	C	Target	60	530	500	800	12,000	600												
				Actual	66	390	523	2,365	12,768	625												
LPI Community Safety	Sports Centres Usage	M	C	Target	53,601	53,899	53,993	62,339	58,184	57,927												
				Actual	53,964	54,580	55,401	57,391	45,616	55,694												
LPI Community Safety	Sports development usages	M	C	Target			1,636	1,654.00	1,681.00	1,763.00												
				Actual	1,854	1,901	1,663	1,792.00	1,334.00	1,818.00												

Planning & Environment

NI157	The percentage of major planning applications determined within 13 weeks	M	C	Target	75.00	75.00	75.00	75.00	75.00	75.00	75.00									
				Actual	100.00	50.00	66.00	100.00	66.00											
				numerator	2	4	1	2	1	2										
				denominator	2	5	2	1	3											
NI157	The percentage of minor planning applications determined within 8 weeks	M	C	Target	80.00	80.00	80.00	80.00	80.00	80.00	80.00									
				Actual	67.00	88.00	85.00	58.00	100.00	46.00										
				numerator	10	15	11	11	6	7										
				denominator	15	17	13	19	6	15										
NI157	The percentage of other planning applications determined within 8 weeks	M	C	Target	90.00	90.00	90.00	90.00	90.00	90.00	90.00									
				Actual	95.00	96.00	90.00	88.00	93.00	88.00										
				numerator	75	81	73	64	51	56										
				denominator	79	84	81	72	55	63										
NI 155	Number of affordable homes delivered	Q	C	Target			20												60	
				Actual			50													80
NI 156	Number of households occupying temporary accommodation	Q	S	Target			23													
				Actual			13													
LP Housing	Average time (weeks) from referral to completion for category 1 DFGs	Q	S	Target	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
				Actual																
LP Housing	Average time (weeks) from referral to completion for category 2 DFGs	Q	S	Target	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
				Actual																
LP Housing	Average time (weeks) from referral to completion for category 3 DFGs	Q	S	Target	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
				Actual																
LP Housing	Percentage of DFG budget allocated to approved schemes	Q	S	Target	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	
				Actual																

LP Housing	Percentage of DFG budget spent	Q	S	Target	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
				Actual													

E-government & Customer Services

CSC	Monthly Call Volumes Customer Contact Centre	M	S	Target	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
				Actual	9,685	7,576	6,341	7,215	6,275	7,497	n/a	n/a	n/a	n/a	n/a	n/a	n/a
CSC	Monthly Call Volume Council Switchboard	M	S	Target	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
				Actual	6,243	5,629	5,412	5,657	4,842	5,389	n/a	n/a	n/a	n/a	n/a	n/a	n/a
CSC LPI 3.1	Resolution at First Point of Contact all services (percentage)	M	C	Target	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00
				Actual	98.00	98.60	98.90	99.00	98.70	98.40	98.40	98.40	98.40	98.40	98.40	98.40	98.40
CSC LPI 3.2	% of Calls Answered	M	C	Target	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00	85.00
				Actual	78.00	77.00	87.00	83.00	94.90	88.70	88.70	88.70	88.70	88.70	88.70	88.70	88.70
CSC LPI 3.3	Average Speed of Answer (seconds)	M	C	Target	30.00	30.00	30.00	30.00	30.00	30.00	30.00	30.00	30.00	30.00	30.00	30.00	30.00
				Actual	34.00	36.00	26.00	28.00	22.00	24.00	24.00	24.00	24.00	24.00	24.00	24.00	24.00

Financial Services

NI 181	Time taken to process HB/CT benefit new claims or change events	M	C	Target	16.00	16.00	16.00	16.00	16.00	16.00	16.00	16.00	16.00	16.00	16.00	16.00
				Actual	15.51	16.27	16.42	16.91	17.53	18.52	18.52	18.52	18.52	18.52	18.52	18.52
NI 179	VFM - total net value of on-going cash releasing VFM gains since the start of 2008-09	Q	C	Target												
				Actual												
ED001	Percentage of invoices paid within 30	M	C	Target	98.00	98.00	98.00	98.00	98.00	98.00	98.00	98.00	98.00	98.00	98.00	98.00
				Actual												

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Efficiency Savings 2008-09

	<u>2008/09</u> <u>£'000</u>
<u>SAVINGS IDENTIFIED</u>	
<u>Corporate Communications</u>	
Departmental Restructure	25
Income generation from additional advertising in Together Bromsgrove.	10
	<u>35</u>
<u>Corporate Services</u>	
Deletion of general expenses budget	18
	<u>18</u>
<u>E-Government</u>	
Desktop printer reorganisation - cancellation of Icon project - balance of saving	3
	<u>3</u>
<u>Financial Services</u>	
Departmental Restructure	35
Income from procurement officer	26
	<u>61</u>
<u>HR & OD</u>	
Departmental Restructure	90
Changes of childcare scheme- replace with Childcare vouchers	14
	<u>104</u>
<u>Legal and Democratic</u>	
Income generation from BDHT	10
Departmental Restructure	104
	<u>114</u>
<u>Planning and Environment</u>	
Departmental Restructure	75
	<u>75</u>
<u>Street Scene & Community</u>	
Departmental Restructure	219
Sponsorship	25
	<u>244</u>
Total Efficiency Savings	<u>654</u>

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BROMSGROVE DISTRICT COUNCIL

3 DECEMBER 2008

CABINET

IMPROVEMENT PLAN EXCEPTION REPORT [SEPTEMBER 2008]

Responsible Portfolio Holder	Councillor Mike Webb Portfolio Holder for Customer Care and Service
Responsible Officer	Hugh Bennett Assistant Chief Executive

1. SUMMARY

- 1.1 To ask Cabinet to consider the Improvement Plan Exception Report for September 2008 (Appendix 1).

2. RECOMMENDATION

- 2.1 That Cabinet considers and approves the revisions to the Improvement Plan Exception Report attached as Appendix 1, and the corrective action being taken.
- 2.2 That Cabinet notes that for the 134 actions highlighted for September within the plan 73.9 percent of the Improvement Plan is on target [green], 6.0 percent is one month behind [amber] and 11.9 percent is over one month behind [red]. 8.2 percent of actions have been reprogrammed with approval. [NB reprogrammed actions are those that have been suspended completely and those that have been moved to a later point in the year. Extended actions are listed separately are actions that are anticipated to take longer than had originally been programmed].
- 2.3 This month's performance is shown on the first page of Appendix 1.

3 BACKGROUND

- 3.1 July 2008 Cabinet approved the Improvement Plan 2008/09. The Improvement Plan is directly linked to the five corporate priorities and thirteen enablers identified in the Council Plan 2008/2011.
- 3.2 The Improvement Plan is designed to push the Council through to a rating of Fair during 2008.

4. FINANCIAL IMPLICATIONS

- 4.1 No financial implications.

5. **LEGAL IMPLICATIONS**

5.1 No Legal Implications.

6. **COUNCIL OBJECTIVES**

6.1 The Improvement Plan relates to all of the Council's four objectives and five priorities as per the 2008/2011 Council Plan.

7. **RISK MANAGEMENT**

7.1.1 The risks associated with the Improvement Plan are covered in the CCPP departmental risk register. Specific corporate risks are related to the Improvement Plan in the following ways:

Corporate Risk Title	Improvement Plan Reference
KO1: Effective Financial Management and Internal Control	FP2 – Financial Management FP3 – Financial Strategy
KO2: Effective corporate leadership	FP1 – Value for Money FP2 – Financial Management FP3 – Financial Strategy FP4 – Financial and Performance Reporting PR2 –Improved Governance
KO3: Effective Member / Officer relations	PR2 –Improved Governance HROD1 – Learning and Development
KO4: Effective Member / Member relations	PR2 –Improved Governance HROD1 – Learning and Development
KO5*: Full compliance with the Civil Contingencies Act and effective Business Continuity	PR1 – Customer Process
KO6: Maximising the benefits of investment in ICT equipment and training	PR3 – Spatial Business Project
KO7: Effective partnership working	PR4 – Improved Partnership Working
KO8: Effective communications (internal and external)	PR1 – Customer Process FP4 – Financial and Performance Reporting HROD 4– Performance Culture
KO9: Equalities and diversity agenda embedded across the Authority	CP3 – Customer Service CP4 – Sense of Community
KO10: Appropriate investment in employee development and training	HROD1 – Learning and Development HROD2 – Modernisation HROD4 – Performance Culture
KO11: Effective employee recruitment and retention	HROD2 – Modernisation
KO12: Full compliance with all Health	FP3 – Financial Strategy

and Safety legislation	PR1 – Customer Process HROD2 – Modernisation
KO13: Effective two tier working and Community Engagement	CP4 – Sense of Community PR4 – Improved Partnership Working
KO14: Successful implementation of Job Evaluation	HROD2 - Modernisation
KO15: All Council data is accurate and of high quality	FP2 – Financial Management FP4 – Financial and Performance Reporting PR3 – Spatial Business Project HROD4 – Performance culture
KO16: The Council no longer in recovery	FP1 – Value for Money FP4 – Financial and Performance Reporting
KO17: Effective Projects Management	FP1 – Value for Money PR3 – Spatial Business Project
KO19: Effective Business and Performance Management	FP4 – Financial and Performance Reporting
KO20: Effective Customer Focused Authority	CP3 – Customer Service CP4 – Sense of Community PR1 – Customer Process

* KO5 and KO18 have been merged

8. **CUSTOMER IMPLICATIONS**

8.1 The Improvement Plan is concerned with the strategic and operational issues that will affect the customer.

9. **EQUALITIES AND DIVERSITY IMPLICATIONS**

9.1 Please see sections CP3 and CP4 of the Improvement Plan

10. **VALUE FOR MONEY IMPLICATIONS**

10.1 See section FP1 of the Improvement Plan

11. **OTHER IMPLICATIONS**

Procurement Issues: See Section FP1 of the Improvement Plan.
Personnel Implications: See Sections HROD1-HROD4 of the Improvement Plan.
Governance/Performance Management: See Sections FP4 and PR2 of the Improvement Plan.
Community Safety including Section 17 of Crime and Disorder Act 1998: See section CP4 of the Improvement Plan
Policy: All sections of the Improvement Plan relate to this.
Environmental: See sections CP1 and PR5 of the Improvement Plan.

12. **OTHERS CONSULTED ON THE REPORT**

Portfolio Holder	Yes
Chief Executive	Yes
Executive Director (Partnerships and Projects)	Yes
Executive Director (Services)	Yes
Assistant Chief Executive	Yes
Head of Service	Yes
Head of Financial Services	Yes
Head of Legal & Democratic Services	Yes
Head of Organisational Development & HR	Yes
Corporate Procurement Team	No

13. WARDS AFFECTED

13.1 All wards

14. APPENDICES

14.1 Appendix 1 Improvement Plan Exception Report September 2008

15. BACKGROUND PAPERS:

15.1 The full Improvement Plan for September can be found at www.bromsgrove.gov.uk under meetings Minutes and Agendas. A hard copy is also left in the Members' Room each month.

CONTACT OFFICER

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Exception Report for September 2008 Improvement Plan

Appendix 1

PROGRESS IN 2008

Overall performance as at the end of September 2008, in comparison with the previous year, is as follows: -

July 2007			August 2007			September 2007			October 2007			November 2007			December 2007		
RED	1	0.6%	RED	1	0.7%	RED	4	2.4%	RED	3	1.8%	RED	5	3.1%	RED	3	2.0%
AMBER	5	3.2%	AMBER	13	9.2%	AMBER	11	6.6%	AMBER	16	9.6%	AMBER	11	7.0%	AMBER	17	11.6%
GREEN	152	95.6%	GREEN	126	88.7%	GREEN	149	89.2%	GREEN	142	85.0%	GREEN	138	86.9%	GREEN	121	82.3%
REPRO	1	0.6%	REPRO	2	1.4%	REPRO	3	1.8%	REPRO	6	3.6%	REPRO	5	3.1%	REPRO	6	4.1%

January 2008			February 2008			March 2008			April 2008			May 2008			June 2008		
RED	2	1.4%	RED	2	1.4%	RED	2	1.5%	RED	3	2.7%	RED	8	7.55%	RED	6	6.3%
AMBER	16	11.4%	AMBER	10	7.3%	AMBER	10	7.4%	AMBER	11	9.9%	AMBER	4	3.8%	AMBER	4	4.2%
GREEN	118	84.3%	GREEN	122	88.4%	GREEN	117	86.7%	GREEN	92	82.9%	GREEN	86	81.1%	GREEN	74	77.0%
REPRO	4	2.9%	REPRO	4	2.9%	REPRO	6	4.4%	REPRO	5	4.5%	REPRO	8	7.55%	REPRO	12	12.5%

July 2008			August 2008			September 2008			October 2008			November 2008			December 2008		
RED	11	8.6%	RED	17	14.4%	RED	16	11.9%	RED			RED			RED		
AMBER	3	2.3%	AMBER	4	3.4%	AMBER	8	6.0%	AMBER			AMBER			AMBER		
GREEN	114	89.1%	GREEN	96	81.4%	GREEN	99	73.9%	GREEN			GREEN			GREEN		
REPRO	0	0%	REPRO	1	0.8%	REPRO*	11	8.2%	REPRO			REPRO			REPRO		

January 2009			February 2009			March 2009			April 2009			May 2009			June 2009		
RED			RED			RED			RED			RED			RED		
AMBER			AMBER			AMBER			AMBER			AMBER			AMBER		
GREEN			GREEN			GREEN			GREEN			GREEN			GREEN		
REPRO			REPRO			REPRO			REPRO			REPRO			REPRO		

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Exception Report for September 2008 Improvement Plan

Appendix 1

Where: -

	On Target or completed		One month behind target or less		Over one month behind target		Original date of planned action	Re-programmed date.*
--	------------------------	--	---------------------------------	--	------------------------------	--	---------------------------------	----------------------

* NB. Reprogrammed actions are both those that have been suspended completely and those that have been moved to a later point in the year. They are not actions that have been extended and they do not appear on the exception report.

Out of the total of 134 actions for September 2008, 12 actions have been extended with approval. This amounts to 8.6 percent of the original actions scheduled for this month. Extended actions are shown with hatched marking and extend the timescale of a current or ongoing action on the Improvement Plan. The actions that have been extended this month are: High street enhancement (1.6); Agree funding and planning permission for train station redevelopment x2 (1.7); Neighbourhood management (4.1); Popularity of events programme (4.3); Business Continuity (10.3); Speed of processing customer queries (12.2); Workforce planning x2 (16.1); Single Status (16.2); Recruitment and retention (16.4).

An Exception Report detailing corrective actions follows:

CP1: Town Centre																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
1.2.2	Identify commercial support				Issues and options consultation ended in September. Advice sought on OJEU process from commercial advisors regarding Market Hall site, but decision on appointing a preferred developer for wider developments delayed until appraisal of all sites is completed.										PS	Jul-08	Nov-08
1.2.	Work Commenced (see 1.4)																
1.2.2	Identify commercial support	PS														Commercial pressures and economic climate are likely to impact on current project timescales. Commercial advice is being taken and work is ongoing but Cabinet date expected to be put back further.	

CP1: Town Centre																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
1.3.1	Consultation on Parkside				Consultation delayed by discussions with Church Commissioners regarding covenant on site.										PS	Aug-08	Dec-08
1.3	Agree sites for relocation of public sector partners																
1.3.1	Consultation on Parkside	PS														Waiting for English Heritage advice. Extended to December to allow for further negotiations	

CP1: Town Centre																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
1.4.2	Seek commercial advice				Issues and options consultation ends in September. Advice sought on OJEU process from commercial advisors regarding market hall site, but decision on appointing a preferred developer for wider developments delayed until appraisal of all sites is completed. Extended to November.										PS	Jul-08	Nov-08
1.4	Reach agreement on redevelopment of the market hall site																
1.4.2	Seek commercial advice	PS														Commercial pressures and economic climate are likely to impact on current project timescales. Report to go to Cabinet in November regarding recommendations for action	

Exception Report for September 2008 Improvement Plan

Appendix 1

CP1: Town Centre																		
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date	
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action			
1.6.2	Meet with AWM															PS	Sept-08	Nov-08
1.6	High street enhancement and improved high street events																	
1.6.2	Meet with AWM	PS															Extended to November.	

CP1: Town Centre																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
1.7.1	Network Rail to agree business case and funding for station.				Network Rail still working on business case and multiple funding of station project. There is not much the District Council can do here, but wait for the funding package to be agreed. Network Rail to hold meeting with AWM. Project on hold pending result of this meeting.										HB	Jul-08	Nov-08
1.7	Agree funding and planning permission for train station redevelopment, with transport links to town centre																
1.7.1	Network Rail to agree business case and funding for station.	HB														Network Rail still working on business case and multiple funding of station project. A meeting of the project team will take place in November after which more should be known. Extended again to November	

CP1: Town Centre																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
1.7.2	Agree historic dimension to new build.		[Red]		There have been discussions with Network Rail and BRUG, but until the station funding package is agreed this cannot be finalised. Timescales may be extended further. Network Rail to hold meeting with AWM. Project on hold pending result of this meeting.										HB	Jul-08	Nov-08
1.7	Agree funding and planning permission for train station redevelopment, with transport links to town centre																
1.7.2	Agree historic dimension to new build.	HB	[Red]	[Red]	[Red]	[Hatched]	[Hatched]									Network Rail still working on business case and multiple funding of station project. On hold pending funding resolution. Extended again to November.	

CP1: Town Centre																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
1.7.3	Obtain planning permission.				The planning application process cannot commence until funding is approved. Network Rail to hold meeting with AWM. Project on hold pending result of this meeting.										HB	Jul-08	Dec-08
1.7	Agree funding and planning permission for train station redevelopment, with transport links to town centre																
1.7.3	Obtain planning permission.	HB														Network Rail still working on business case and multiple funding of station project. On hold pending funding resolution.	

Exception Report for September 2008 Improvement Plan

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CP2: Housing																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
2.1.3	Prepared affordable Housing Supplementary Planning Document (SPD)		[Red]		Draft prepared although PPS12 does not include provision to link SPDs to the RSS which was expected. A meeting was held with GOWM to discuss ways to bring policy forward but the issue remains unresolved.										MD	Jul-08	June-09
2.1.	Delivery of affordable housing target (Housing Strategy)																
2.1.3	Prepared affordable Housing Supplementary Planning Document (SPD)	MD	[Red]	[Red]	[Red]	[Hatched]	[Hatched]	[Hatched]	[Hatched]	[Hatched]	[Hatched]	[Hatched]	[Hatched]	[Hatched]	[Hatched]	The SPD will now be consulted on alongside the Core Strategy. Extended to align with core strategy timelines (see section 14) which is dependent on resolution of RSS2.	

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CP4: Sense of Community																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
4.1.1	Stakeholder event for 3 pilots		[Orange]		Delayed. First event is now planned for 28 th November.										HB	Aug-08	Nov-08
4.1	Neighbourhood management																
4.1.1	Stakeholder event for 3 pilots	HB	[Red]	[Orange]	[Hatched]	[Hatched]									Invitations have been sent out.		

CP4: Sense of Community																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
4.1.4	Agree approach 'Hagley Rural' with Leader and Leader of Opposition				Awaiting results of consultation, which closes on 31 st October 2008.										HB	Aug-08	Nov-08
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
4.1	Neighbourhood management																
4.1.4	Agree approach 'Hagley Rural' with Leader and Leader of Opposition	HB														Will be determined at stakeholder event on 28th November.	

CP4: Sense of Community																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
4.1.6	Develop action plans and submit to LSP and Cabinet (if Budget Bids)				Currently out to consultation with two stakeholder groups.										HB	Jul-08	Oct-08
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
4.1	Neighbourhood management																
4.1.6	Develop action plans and submit to LSP and Cabinet (if Budget Bids)	HB														Have developed plan for Rubery, but need to develop for Alvechurch. HB to meet with the Leader in November to develop this.	

CP4: Sense of Community																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
4.3.1 3	Establish monitoring & meeting arrangements set out in the SLA with the Artrix.		[Redacted]		Work in this area is ongoing due to concern raised by the Operating Trust of the Artrix over some of the phrasing in the agreement document. Extended to December.										JG	Jul-08	Dec-08
4.3	Popularity of events programme																
4.3.13	Establish monitoring & meeting arrangements set out in the SLA with the Artrix.	JG	[Green]	[Redacted]	[Redacted]	[Grey]	[Grey]	[Grey]								Officers have forwarded the revised SLA to the Operating Trust and are awaiting feedback before commencing formal discussions.	

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Exception Report for September 2008 Improvement Plan

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CP4: Sense of Community																	
Ref	September 2008 Action	Colour	Corrective Action												Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
4.3.1 4	Agree service improvement plan and targets based on SLA, previous years performance and BDC user feedback out turns.		Work in this area is ongoing due to concern raised by the Operating Trust of the Artrix over some of the phrasing in the agreement document. Extended to December.												JG	Jul-08	Dec-08
4.3	Popularity of events programme																
4.3.14	Agree service improvement plan and targets based on SLA, previous years performance and BDC user feedback out turns.	JG														Officers have forwarded the revised SLA to the Operating Trust and are awaiting feedback before commencing formal discussions.	

Exception Report for September 2008 Improvement Plan

Appendix 1

CP4: Sense of Community																	
Ref	September 2008 Action	Colour	Corrective Action												Who	Original Date	Revised Date
4.3.1 5	Agree service improvement plan and targets based on SLA, previous years performance and BDC user feedback out turns.		Due to delays in the acceptance of the SLA work in this area has not yet been progressed. Extended to January.												JG	Sep-08	Jan-09
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
4.3	Popularity of events programme																
4.3.15	Agree service improvement plan and targets based on SLA, previous years performance and BDC user feedback out turns.	JG														Officers have forwarded the revised SLA to the Operating Trust and are awaiting feedback before commencing formal discussions.	

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FP1: Value For Money																	
Ref	September 2008 Action	Colour	Corrective Action												Who	Original Date	Revised Date
6.2.3	Transfer Dolphin Centre to Leisure Trust		Trust withdrew from transfer negotiations on 4 th September. Leisure Transfer Group considering options for future action.												PS	Jul-08	Dec-08
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
6.2	Alternative methods of service delivery, to include revisiting the shared services/ joint working agenda																
6.2.3	Transfer Dolphin Centre to Leisure Trust	PS														Report to Cabinet on 4 th December.	

Exception Report for September 2008 Improvement Plan

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FP1: Value For Money																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
6.3.4	Reduced number of suppliers by agreeing framework contracts				Report to be extracted to analyse the number of suppliers used over the previous year with the aim to demonstrate a reduction in suppliers.										JLP	Aug-08	Oct-08
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
6.3	Improved procurement																
6.3.4	Reduced number of suppliers by agreeing framework contracts	JLP														Process has now been put in place. No reduction has taken place yet as suppliers will be analysed in a joint procurement exercise with Redditch BC in November.	

FP4: Financial and Performance Reporting																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
9.2.4	'Glossy' Annual Report published				Wrap around produced which will go out in November. Delayed, as waiting final accounts sign off from auditors.										HB	Sept-08	Nov-08
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
9.2	Integrated Annual Report																
9.2.4	'Glossy' Annual Report published	HB														Will be published in November.	

Exception Report for September 2008 Improvement Plan

Appendix 1

PR1: Customer Process																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
10.3.2	Ordered functions by tolerance				Work progressing on business continuity plan. However, the preparation of the plan has take longer than anticipated and the plan will now not be completed before mid November. Report will go to Leaders Group in January 2009.										PS	Aug-08	Jan-09
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
10.3	Business Continuity																
10.3.2	Ordered functions by tolerance	PS														Extended again to January.	

PR3: Spatial Business Project																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
12.2.3	Review results and revise standards				Focus groups held. Review will not take place until first draft of customer access strategy in November.										HB	Sept-08	Nov-08
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
12.2	Speed of processing customer queries																
12.2.3	Review results and revise standards	HB														Extended to November when draft CA Strategy will have been developed.	

PR5: Planning																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
14.2.2	Prepared formal representation on preferred option				Awaiting outcomes of Nathaniel Lichfield Partnership study into the possibility of increasing the level of house building across the region (which will be published in October) before drafting final response jointly with Redditch BC. Will go to Leader's Group in December.										MD	Aug-08	Oct-08
14.2	Regional Spatial Strategy Phase 2 Revision																
14.2.2	Prepared formal representation on preferred option	MD														GOWM have commissioned more work to look into the possibility of increasing the level of house building across the region, consequently the levels of development the district will be expected to deliver is unclear. Further to this Redditch's designation as a Settlement of Significant Development may increase the levels of growth expected for Redditch, disproportionately to that of other districts within the West Midlands.	

Exception Report for September 2008 Improvement Plan

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HR&OD2: Modernisation																					
Ref	September 2008 Action	Colour	Corrective Action												Who	Original Date	Revised Date				
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action						
16.1.3	Establish Workforce Planning Champions for each Service area																Timeline adjusted to take account of joint working with RBC.	JP	Sept-08	Nov-08	
16.1	Workforce Planning																				
16.1.3	Establish Workforce Planning Champions for each Service area	JP																			Project plan on workforce planning is being revised to align with Redditch's work in this area. Extended to November.

HR&OD2: Modernisation																								
Ref	September 2008 Action	Colour	Corrective Action												Who	Original Date	Revised Date							
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action									
16.1.4	Data Collection																				Timeline adjusted to take account of joint working with RBC.	JP	Sept-08	Nov-08
16.1	Workforce Planning																							
16.1.4	Data Collection	JP																						Extended to November

Exception Report for September 2008 Improvement Plan

Appendix 1

HR&OD2: Modernisation																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
16.2.2	Implementation				Negotiations with unions ongoing. Staff briefings to explain causation of delay. Counsel Opinion being sought.										JP	Aug-08	Nov-08
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
16.2	Single Status																
16.2.2	Implementation	JP														Special Cabinet meeting on 22 nd October to consider how to proceed.	

HR&OD2: Modernisation																	
Ref	September 2008 Action		Colour		Corrective Action										Who	Original Date	Revised Date
16.4.3	Produce quick guide to recruitment process				Delayed by 2 months due to workload arising from payroll transfer.										JP	Sept-08	Nov-08
Ref.	Action	Lead	July	Aug.	Sep.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	Corrective Action		
16.4	Recruitment and retention																
16.4.3	Produce quick guide to recruitment process	JP														Extended to November	

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BROMSGROVE DISTRICT COUNCIL

CABINET

3 DECEMBER 2008.

UNREASONABLE AND PERSISTENT COMPLAINANTS' POLICY

Responsible Portfolio Holder	Cllr Mike Webb
Responsible Head of Service	Hugh Bennett
Non-key Decision	

1. SUMMARY

- 1.1 This report sets out a policy and process to enable the Council effectively deal with unreasonable and persistent complainants'. It will also help staff Understand what is expected of them, what options for action is available and who can authorise these actions

2. RECOMMENDATION

- 2.1 That the Unreasonable and Persistent Complainants policy at Appendix 1 be approved.

3. BACKGROUND

- 3.1 Generally, dealing with a complaint is a straight-forward process, but in a minority of cases customers pursue their complaints in an inappropriate way which can have significant resource issues for the Council. The Local Government Ombudsman terms such customers as 'unreasonably persistent complainants'. Their definition of an unreasonable persistent complainant is a complainant who, because of the frequency or nature of their contact with an authority, hinders the authority's consideration of their or other peoples, complaints.
- 3.2 Unreasonable and unreasonably persistent complainants may have justified complaints or grievances, but pursue them in an unacceptable manner or they may be intent on pursuing complaints which appear to have no substance or which have already been investigated and determined. Their contacts with authorities may be amicable but still place very heavy demands on staff time, or they may be very emotionally charged and distressing for all involved.
- 3.3 The Council has recently had contact with two 'unreasonable and persistent complainants who have taken up many hours of officer's time investigating spurious complaints. For example one customer wrote in to say he wanted an assisted bin collection and a refund of ten years of

council tax as compensation for the Council not giving him the services he wanted and went on to list his requirements on eight sides of A4 paper. An officer telephoned him to deal with the assisted bin issue and after 40 very demanding and difficult minutes on the phone found that the customer had also contacted many other officers and members by telephone and letter. He had also written 38,000 complaint letters to central and local government.

- 3.4 It is clear that the Council requires a policy on unreasonably persistent complainants and unreasonable complainant behaviour and corresponding guidance for staff. This will help the Council deal with complainants in ways which are demonstrably consistent and fair. It will also help staff to understand what is expected of them, what options for action are available, and who can authorise these actions. In the absence of such guidance staff are likely to have greater problems with unreasonable and unreasonably persistent complainants
- 3.5 The attached proposed policy and procedure has been produced in line with guidance from the Ombudsman on what they regard to be good practise in dealing with these complainants

4. FINANCIAL IMPLICATIONS

None

5. LEGAL IMPLICATIONS

None

6. COUNCIL OBJECTIVES

- 6.1 CO2 Improvement

7. RISK MANAGEMENT

- 7.1 The main risks associated with the details included in this report are:

- That without a policy and guidance, officer's time could be wasted on spurious complaints.
- That genuine complaints could be overlooked

- 7.2 These risks are being managed as follows:

Risk Register: *CCPP*

Key Objective Ref No: 2
Key Objective: Regular monitoring of Customer Feedback System
through Customer First Board

8. CUSTOMER IMPLICATIONS

- 8.1 The policy will provide a fair and consistent procedure for dealing with persistent complainants allowing the Council to focus on genuine cases.
- 8.2 Staff will understand what is expected of them and what they can do in such situations.

9. EQUALITIES AND DIVERSITY IMPLICATIONS

- 9.1 Careful consideration needs to be given in each case of any equalities issues, for example, the complainant being a vulnerable member of the community.

10. VALUE FOR MONEY IMPLICATIONS

None

11. OTHER IMPLICATIONS

Procurement Issues None
Personnel Implications None
Governance/Performance Management None
Community Safety including Section 17 of Crime and Disorder Act 1998 - None
Policy None
Environmental None

12. OTHERS CONSULTED ON THE REPORT

Portfolio Holder	Yes
Chief Executive	Yes
Executive Director - Partnerships and Projects	No
Executive Director - Services	Yes
Assistant Chief Executive	Yes
Head of Financial Services	No
Head of Legal, Equalities & Democratic Services	No
Head of Organisational Development & HR	No
Corporate Procurement Team	No

13. WARDS AFFECTED

All wards

14. APPENDICES

Appendix 1 Unreasonable and persistent complainants' policy.

15. BACKGROUND PAPERS

CONTACT OFFICER

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Appendix 1



Bromsgrove
District Council

www.bromsgrove.gov.uk

Unreasonable and Persistent Complainants' Policy.



Introduction

Most of the time, dealing with a customer complaint is a straight forward process. We use the procedure and guidelines as set out in our Customer First Manual; however, sometimes a customer will act unreasonably when making their complaint either by the frequency or nature of their complaints or by their behaviour.

The policy will set out how we will deal with unreasonable and persistent complainants'. It will also help staff understand what is expected of them, what options for action are available and who can authorise these actions

Definition of unreasonable and persistent complainants

"Unreasonable and unreasonably persistent complainants are those customers who, because of the frequency or nature of their contacts with the Council, hinder the Council's consideration of their or other people's, complaints."

Unreasonable and unreasonably persistent complainants may have justified complaints or grievances but will pursue them in inappropriate ways, or they may be intent on pursuing complaints which appear to have no substance or which have already been investigated and determined. Their contacts with authorities may be amicable but still place very heavy demands on staff time, or they may be very emotionally charged and distressing for all involved.

How to recognise unreasonable and persistent complainant behaviour

These are some of the actions and behaviours that you may come across with unreasonable and unreasonably persistent complainants:

- Refusing to specify the grounds of a complaint, despite offers of assistance with this from the authority's staff.
- Refusing to co-operate with the complaints investigation process while still wishing their complaint to be resolved.
- Refusing to accept that issues are not within the remit of a complaints procedure despite having been provided with information about the procedure's scope.
- Insisting on the complaint being dealt with in ways which are incompatible with the adopted complaints procedure or with good practice.
- Making what appear to be groundless complaints about the staff dealing with the complaints, and seeking to have them replaced.

- Changing the basis of the complaint as the investigation proceeds and/or denying statements he or she made at an earlier stage.
- Introducing trivial or irrelevant new information which the complainant expects to be taken into account and commented on, or raising large numbers of detailed but unimportant questions and insisting they are all fully answered.
- Electronically recording meetings and conversations without the prior knowledge and consent of the other persons involved.
- Adopting a 'scattergun' approach: pursuing a complaint or complaints with the authority and, at the same time, with a Member of Parliament/a councillor/the authority's independent auditor/the Standards Board/local police/solicitors/the Ombudsman.
- Making unnecessarily excessive demands on the time and resources of staff whilst a complaint is being looked into, by for example excessive telephoning or sending emails to numerous council staff, writing lengthy complex letters every few days and expecting immediate responses.
- Submitting repeat complaints, after complaints processes have been completed, essentially about the same issues, with additions/variations which the complainant insists make these 'new' complaints which should be put through the full complaints procedure.
- Refusing to accept the decision – repeatedly arguing the point and complaining about the decision.
- Combinations of some or all of these.

What to do if you consider that a customer is an unreasonable and persistent complainant

Your first step is to contact your Head of Service who should then consider the following:

- the complaint is being or has been investigated properly;
- any decision that has been made on the complaint is the right one;

- communications with the complainant have been adequate; and
- the complainant is not now providing any significant new information that might affect the Council's view on the complaint.

If your Head of Service is satisfied on the above points they should contact the Customer First Officer to request that the unreasonable and persistent complainant policy is applied to the customer.

The Customer First Officer will consider the following before taking any action

- If no meeting has taken place between the complainant and officer(s), and provided that the Council knows nothing about the complainant which would make this inadvisable, consider offering the complainant a meeting with an officer of appropriate seniority. Sometimes such meetings can dispel misunderstandings and move matters towards a resolution.
- If more than one department is being contacted by an unreasonably persistent complainant, consider:
 - setting up a strategy meeting to agree a cross-departmental approach; and
 - designating a key officer to co-ordinate the Council's response(s).
- If the complainant is a vulnerable person or has special needs, an advocate might be helpful to both parties: consider offering to help the complainant find an independent one. Consider contacting social services and the police who might have prior knowledge of the complainant.
- Contact the Ward Councillor to discuss the complainant and any background information the Councillor may have.
- Before applying any restrictions give the complainant a warning that if his/her actions continue the Council may decide to treat him/her as an unreasonably persistent complainant, and explain why. A leaflet has been produced to let the complainant know what the policy entails (see Appendix 1)

If all of the above points have been satisfied, the Customer First Officer will forward the request to the Assistant Chief Executive who will then decide whether the policy will be applied.

What happens when the customer is deemed as an unreasonably persistent complainant?

If a decision is taken to apply the policy, The Head of the relevant Department should:

- Refuse to register and process further complaints about the same matter.
- Limit the complainant to one medium of contact (telephone, letter, email etc) and require the complainant to communicate only with one named member of staff.
- Place time limits on telephone conversations
- Inform the complainant that future correspondence will be read and placed on file but not acknowledged. A designated officer should be identified who will read future correspondence.
- Ensure all the above details are recorded on the customer record within the Customer Feedback system
- Inform all members of staff - with the assistance of the Customer First Officer.

The Head of Service will write to inform the complainant that:

- the decision has been taken and
- what it means for his or her contacts with the authority. A leaflet has been produced to explain our policy- please see Appendix 1

For further advice or assistance please contact the Assistant Chief Executive or the Customer First Officer.



Bromsgrove
District Council

www.bromsgrove.gov.uk

Unreasonable and persistent complainants' policy

Why does the Council have this policy?

Most of the time, dealing with a customer complaint is a straight forward process. We use the procedure and guidelines as set out in our Customer First Manual; however, sometimes a customer will act unreasonably when making their complaint either by the frequency or nature of their complaints or by their behaviour. We have produced a policy in accordance with guidance from the Local Government Ombudsman which will help us to deal with such complainants in a fair and consistent way.

What is an Unreasonable and persistent complainant?

Unreasonable and unreasonably persistent complainants are those customers who, because of the frequency or nature of their contacts with the Council, hinder the Council's consideration of their or other people's complaints.

What will happen if the Council decides that I am an unreasonable and persistent complainant?

We do not make such decisions lightly. Your concerns will be carefully considered and all avenues explored to find a resolution. If our investigations find that that your contact with Council is unreasonable we will write to inform you that we will be considering placing you on our Unreasonable and Persistent Complainants Register. If a decision is taken to apply the policy, we will:

- Refuse to register and process further complaints from you about the same matter although we will assist with requests for services we provide.
- Ask you to use one medium of contact (telephone, letter, email etc) and give you a named member of staff to contact.
- Place time limits on telephone conversations with you.
- Inform you that any future correspondence received from you will be read and placed on file but not acknowledged.
- Ensure that all the above details are recorded on our Customer Feedback system for information.

By virtue of paragraph(s) 4 of Part 1 of Schedule 12A of the Local Government Act 1972.

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