



BROMSGROVE DISTRICT COUNCIL

MEETING OF THE LOCAL DEVELOPMENT FRAMEWORK WORKING PARTY

WEDNESDAY 16TH DECEMBER 2009 AT 10.00 A.M.

(PLEASE NOTE TIME OF MEETING)

THE COUNCIL HOUSE, BURCOT LANE, BROMSGROVE

MEMBERS: Councillors Mrs. M. Bunker, S. R. Colella, G. N. Denaro, Mrs. R. L. Dent, Mrs. J. Dyer M.B.E., R. Hollingworth, Mrs. J. D. Luck, E. J. Murray, S. R. Peters, Mrs. M. A. Sherrey JP, E. C. Tibby, P. J. Whittaker and C. J. K. Wilson

AGENDA

1. To receive apologies for absence and notification of substitutes
2. Declarations of Interest
3. To confirm the accuracy of the minutes of the meeting of the Local Development Framework Working Party held on 15th October 2009 (Pages 1 - 6)
4. Annual Monitoring Report (Pages 7 - 56)
5. Affordable Housing SPD (Pages 57 - 84)
6. Core Strategy Update (Pages 85 - 90)
7. RSS Phase 3 (Pages 91 - 128)
8. 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

K. DICKS
Chief Executive

The Council House
Burcot Lane
BROMSGROVE
Worcestershire
B60 1AA

7th December 2009

BROMSGROVE DISTRICT COUNCIL

MEETING OF THE LOCAL DEVELOPMENT FRAMEWORK WORKING PARTY

THURSDAY, 15TH OCTOBER 2009 AT 2.00 P.M.

PRESENT: Councillors S. R. Colella, Mrs. R. L. Dent, R. Hollingworth,
Mrs. J. D. Luck, E. J. Murray, S. R. Peters, Mrs. M. A. Sherrey JP,
E. C. Tibby, P. J. Whittaker and C. J. K. Wilson

Officers: Mr. D. Hammond, Mr. M. Dunphy, Mrs. R. Williams, Ms. J.
Carstairs, Ms. C. Biolcati, Mr. A. Harvey, Ms. S. Lai and Ms. R. Cole

1/09 **ELECTION OF CHAIRMAN**

RESOLVED that Councillor Mrs. J. Dyer M. B. E. be elected Chairman of the Working Party for the ensuing municipal year.

2/09 **ELECTION OF VICE CHAIRMAN**

RESOLVED that Councillor P. J. Whittaker be elected Vice Chairman of the Working Party for the ensuing municipal year. In the absence of Councillor Mrs. Dyer, Councillor Whittaker then took the Chair.

3/09 **APOLOGIES FOR ABSENCE**

Apologies for absence were received from Councillors Mrs. M. Bunker, G. N. Denaro and Mrs. J. Dyer M. B. E.

4/09 **DECLARATIONS OF INTEREST**

No declarations of interest were received.

5/09 **MINUTES**

The minutes of the meeting of the Local Development Working Party held on 16th March 2009 were submitted.

RESOLVED that the minutes be approved as a correct record.

6/09 **REGIONAL SPATIAL STRATEGY - EXAMINATION IN PUBLIC PANEL REPORT**

The Working Party considered a report which set out the key findings from the Regional Spatial Strategy (RSS) Phase 2 revision Examination in Public (EIP) Panel Report.

The Strategic Planning Manager briefly reminded Members of the background to this item and reported that the EIP hearing sessions had taken place during May and June 2009. Officers had actively participated in two sessions and had attended and submitted evidence for other key sessions.

Members' attention was drawn to the findings of the Panel on a number of issues which had an impact on the Bromsgrove District.

Additional Birmingham Growth

It was reported that at present additional Birmingham growth had been ruled out by the Panel. The only reference to cross boundary growth was in relation to the 700 units already agreed as part of the Longbridge Area Action Plan and therefore there was no additional growth in Bromsgrove required for Birmingham's needs.

Accommodating Redditch Growth

Clearly this had been a key issue for this Council which had been given detailed consideration by the Panel in view of the controversy surrounding the matter. The outcome was that the overall housing figure for Redditch had increased to 7000 units with the level to be provided within Bromsgrove decreasing to 3000. The Panel had concurred with the view of this Authority that the choice of the location of development around the boundary of Redditch should be determined by the two Authorities working closely together. It was also clear that the timetables for the two Core Strategies would need to be closely aligned.

It was also noted that the Panel had concluded that the area around Studley could take housing growth without having a significant impact on rural character and had recommended that further work be undertaken to improving the A435 south east of Redditch in order to open up the possible growth in this area.

Bromsgrove's Housing Allocation

It was reported that a strong case had been made to the Panel that the preferred option housing allocation for Bromsgrove of 2100 units was wholly inadequate and that the figure should be increased to enable the Council the opportunity to address the housing imbalance whilst not significantly eroding the green belt. The Panel had agreed with this view and recommended an increased housing target of 4000 units, with reference being made to the possibility of an additional 2000 to 3000 dwellings after 2021 subject to the review of the Core Strategy.

The Panel had also endorsed and recommended to other Authorities, the Council's proposed approach to housing supply in targeting provision at the types and sizes that would address locally generated need for small low cost houses.

The Strategic Planning Manager also referred to other significant recommendations from the Panel which were set out in section 3.21 of the report.

It was reported that the findings of the Panel would now be reviewed by the Government Office West Midlands and the Department for Communities and Local Government and it was anticipated any proposed changes to these findings would be published for consultation by the end of 2009. It was intended to report to the Working Party further when this information had been received.

Members expressed their appreciation of the work undertaken by Officers in the preparation and presentation of the Council's case to the EIP which had led to the outcomes reported.

RESOLVED:

- (a) that the report be noted; and
- (b) that thanks be expressed to Officers for the work which had been undertaken in developing and presenting the evidence to the EIP.

7/09

DRAFT CORE STRATEGY CONSULTATION FEEDBACK

Consideration was given to a report on the outcome of the consultation process undertaken on the Draft Core Strategy. It was noted that 135 representations had been received from organisations, companies and individuals during the consultation period.

The report summarised the key points of objection to the various policies within the Draft Core Strategy. Policy CP 2 relating to Distribution of Housing had generated the most comments and obviously the outcome of the RSS EIP had not been known at the time of the consultation process. It was now intended to produce a revised version of the Core Strategy taking account of the implications of the RSS EIP Panel and including Strategic Site Allocations.

It was also reported that as part of the process of producing the Core Strategy, the Authority had participated in the Spatial Planning Peer Programme. Draft feedback had been received on how the process of producing the Core Strategy could be improved and developed and the main points were set out in section 4.4 of the report.

There was discussion on how the Members of the Working Party could participate more fully in the development of the revised Core Strategy policies at an earlier stage, possibly by way of establishing small informal workshops or topic groups on a number of key issues in accordance with a suggestion of the Spatial Planning Peer Programme. The revised Draft Core Strategy would then be submitted to a future meeting of the Working Party.

RESOLVED:

- (a) that the contents of the report including the responses to the Core Strategy consultation be noted;
- (b) that following the suggestions arising from the Spatial Planning Peer Programme, informal Member workshops be held to discuss and develop individual Core Strategy policies prior to consideration by the Working Party.

8/09 **DRAFT AFFORDABLE HOUSING SUPPLEMENTARY PLANNING DOCUMENT**

Consideration was given to a report on a Draft Affordable Housing Supplementary Planning Document (SPD).

It was reported that in the light of the outcome of the RSS panel report and the identification through a number of surveys of a significant level of need for affordable housing in the Bromsgrove district, it was considered to be appropriate to progress the production of an Affordable Housing SPD which would address this need. Following the consultation procedure and the approval of a final version by Members, the SPD would be linked to the Draft Core Strategy.

The proposed thresholds for provision of affordable housing as set out in section 5.4 of the draft SPD were discussed and it was felt that the threshold should be 5 dwellings for all sites whether in Bromsgrove Town or other settlements.

RESOLVED:

- (a) that authority be delegated to the Head of Planning and Environment Services in consultation with the responsible Portfolio Holder to revise the draft SPD as appropriate and to publish the document for formal consultation; and
- (b) that following the consultation process and the inclusion of any revisions arising from the responses received, a version to be adopted be submitted for approval by Members by early 2010.

9/09 **JOINT BROMSGROVE AND REDDITCH PLANNING ADVISORY BOARD**

It was reported that in view of the need for the Core Strategies of this Council and Redditch Borough Council to be closely linked it was intended to establish further joint working arrangements. At present the details of the arrangements had not been finalised and these would be reported to a future meeting of the Working Party.

RESOLVED that the position be noted.

10/09 **TOWN CENTRE CONSERVATION AREA APPRAISAL**

The Working Party considered a report on a Conservation Area Character Appraisal which had been undertaken as part of a review of the Bromsgrove Town Conservation Area.

The report sought approval to commence public consultation based on the draft Character Appraisal, proposed boundary revisions and management proposals. It was intended to review all of the other Conservation Areas in the District over a period of time.

Members felt it would be appropriate for Local Ward Members to have the opportunity to have an input into any proposed changes to the Conservation Area prior to further consideration by the Working Party.

RESOLVED that further consideration of the proposed changes to the Town Centre Conservation Area be deferred and in the meantime, the Local Ward Members meet on site with the Conservation Officer to discuss the issue further.

11/09 **TOWN CENTRE HEALTH CHECK**

Consideration was given to a report on progress made on preparation of the draft Bromsgrove Town Centre Health check. It was noted that the findings of the Health Check would be an important feature of the evidence base required to support the regeneration of the town centre.

RESOLVED that the progress made on the preparation of the draft Bromsgrove Town Centre Health Check be noted.

12/09 **LONGBRIDGE DEVELOPMENT**

(The Chairman agreed to the consideration of this item as a matter of urgency as a decision was required thereon before the next meeting of the Working Party)

The Leader referred to an issue which had been raised with him regarding the Longbridge Development. The Strategic Planning Manager responded and explained the potential implications of the issue. It was

RESOLVED that the position be noted.

The meeting closed at 4.40 p.m.

Chairman

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BROMSGROVE DISTRICT COUNCIL

LOCAL DEVELOPMENT FRAMEWORK WORKING GROUP

WEDNESDAY 16TH DECEMBER 2009

ANNUAL MONITORING REPORT 2008/09

Responsible Portfolio Holder	Councillor Mrs J Dyer
Responsible Head of Service	Dave Hammond, Head of Planning & Environment Services
Non-Key Decision	

1. SUMMARY

- 1.1 The report summarises the contents of the Annual Monitoring Report (AMR) for the period between April 1st 2008 and March 31st 2009.

2. RECOMMENDATION

- 2.1 The attached Annual Monitoring Report be approved for submission to the Government Office of the West Midlands (GOWM).

3. BACKGROUND

- 3.1 Review and monitoring are key aspects of the Governments 'plan, monitor and manage' approach to the planning system. They are seen as crucial to the successful delivery of the spatial vision and objectives of the LDF. The process of reviewing and monitoring will enable a comprehensive evidence base to be built against which Local Development Document policies and implementation can be assessed. It will also enable trends to be identified to which the Council can respond by producing Development Plan Documents (DPDs) or Supplementary Plan Documents (SPDs). These documents form part of the portfolio of Local Development Documents contained within the LDF.
- 3.2 This is the fifth successive Annual Monitoring Report (AMR) produced by Bromsgrove District Council since the introduction of the new planning system in September 2004. The Planning and Compulsory Purchase Act (2004) requires Bromsgrove District Council to produce an AMR and submit the report to Government Office in December on an annual basis. The AMR is a Local Development Document and forms part of the Local Development Framework. The AMR must assess:
- implementation of the Local Development Scheme; and
 - the extent to which policies in the Local Development Documents are being achieved.

- 3.3 As required by the Planning Act and associated regulators, Bromsgrove District Council must undertake the following five key monitoring tasks:
- review actual progress in terms of local development document preparation against the timetable and milestones in the local development scheme;
 - assess the extent to which policies in the Local Development Document preparation against the timetable and milestones in the Local Development Scheme;
 - where policies are not being implemented, explain why and set out what steps are to be taken to ensue that the policy is implemented; or whether the policy is to be amended or replaced;
 - identify the significant effects of implementing policies in Local Development Documents and whether they are intended; and
 - set out whether policies are to be amended or replaced.
- Source: Local Development Framework Monitoring: A Good Practice Guide, ODPM (2005, Pg.9).*
- 3.4 This AMR covers the period 1st April 2008 to 31st March 2009. However, in some cases the timeframe has been extended to beyond March 2009 where it was considered necessary to record such information, for example, when discussing LDS timetable milestones. Over the last two years the AMR has had to take into account the new government advice; Regional Spatial Strategy and Local Development Framework: Core Output Indicators - Update 2/2008. The main findings of the 2008/09 AMR have been summarised as follows.
- 3.5 The Local Development Scheme (LDS) was revised and adopted back in March 2008; therefore the majority of Development Plan Documents have met their milestones and targets. However, some delays existed due to the Phase Two revision of the RSS, which only saw the Panel Report published on Monday 28th September 2009. Therefore delays have occurred to the timetable of the Core Strategy and Town Centre AAP, as well as the Affordable Housing SPD, although a draft document is currently being consulted on.
- 3.6 In total, 16,787.26m² of employment land floorspace was developed during the monitoring period. This brings the total amount of employment land completed from 2006 (the beginning of the plan period) to 69,027.37m². The District has a stable and strong business sector with the registration of businesses significantly higher than de-registrations. The continued development of high-technology firms at locations such as Bromsgrove Technology Park is likely to promote employment growth. The former MG Rover plant is also expected to see regeneration commence as the AAP was formally adopted in April 2009.
- 3.7 There were a total of 159 new dwellings built in the District over the monitoring period, with 79.2% of homes built at a density greater than 30 dwellings per hectare, the minimum recommendation from PPS3. The

regional target for future housing provision being on Previously Developed Land (PDL) is 76% and 68% for Worcestershire. Bromsgrove has successfully achieved high figures with 95.23% of this AMR's housing being on PDL. Of these completions, there were 98 affordable housing units, which is significantly higher than last years figure of 31 affordable housing units. This figure is considerably higher than the Bromsgrove District Council's target of 80 per annum, which was proposed as part of the Council Plan in 2008.

- 3.8 Bromsgrove District is predominantly rural leading to an over reliance on private transport. However, the majority of new development, whether commercial or residential, has been located either in or around Bromsgrove Town, or other large villages - which are the most sustainable locations in regards to public transport. All non-residential development has complied with car parking standards set out in the Local Plan. A large proportion of new residential development has been built within 30 minutes public transport time of key services, including GP surgeries, schools, employment areas, and retail centres. Future retail development will be focused in Bromsgrove Town centre through the Area Action Plan, which went through a consultation on the Issues and Options during this AMR period.
- 3.9 No planning applications were granted contrary to the advice of the Environment Agency to ensure developments are not taking place in locations where there is the greatest risk of flooding. No renewable energy capacity was provided within the District in the monitoring period. The conditions of Sites of Specific Scientific Interest (SSSIs) within the District are still below government targets, which aim to be rectified by 2010. One SSSI improved slightly and is no longer in a state of decline, whereas the other twelve SSSIs remained in the same condition as last year. The Council has monitored planning applications where it was considered that there would be a significant impact on biodiversity. In all granted planning permissions, biodiversity implications were considered fully and conditions established to reduce the risk of any harm.

4. FINANCIAL IMPLICATIONS

- 4.1 There are no direct implications of submitting the AMR to the GOWM.

5. LEGAL IMPLICATIONS

- 5.1 Section 35 of the 2004 Planning and Compulsory Purchase states that every local planning authority must make an annual report to the Secretary of State. The annual report must contain such information as is prescribed as to:
- (a) The implementation of the local development scheme;
 - (b) The extent to which the policies set out in the local development documents are being achieved.
- 5.2 The annual report must:

- (a) Be in respect of such period of 12 months as is prescribed;
- (b) Be made at such time as is prescribed;
- (c) Be in such form as is prescribed; and,
- (d) Contain such other matter as is prescribed.

6. COUNCIL OBJECTIVES

6.1 Objective 1: Regeneration - Priorities: Town Centre and Housing

The AMR assesses progress on the LDS and monitors progress on a series of key indicators. This includes monitoring progress on regeneration related planning documents such as the Bromsgrove Town Centre AAP. Continual monitoring can identify areas for future improvement in terms of delivering regeneration to the town centre. Housing completions in relation to RSS targets are monitored, which indicates how successful the District is in terms of housing regeneration.

Objective 2: Improvement

The AMR identifies the number of affordable housing completions that have occurred over the past year, as well as denotes progression with the environmental quality of the District. The Council can assess how it has improved each year through the figures in the AMR.

Objective 3: Sense of Community and Well Being

The AMR monitors all parts of a spatial planning framework which looks not only at the uses of land, but also the social and economic aspects of the community and how they can be enhanced through more inclusive planning policy.

Objective 4: Environment - Priorities: Clean Streets and Climate Change

The AMR assesses the environmental quality of the District by recording changes in areas of biodiversity importance and areas designated for their intrinsic environmental value. The AMR also records the amount of renewable energy that is generated through new planning applications each year.

7. RISK MANAGEMENT INCLUDING HEALTH & SAFETY CONSIDERATIONS

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

- Non legally compliant Strategic planning service

7.2 These risks are being managed as follows:

Risk Register: Planning and Environment Services
Key Objective Ref No: 6

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

7.3 The AMR is a key part of the evidence base for the LDF without this information the likelihood of policy documents being found unsound is greatly increased as it would not be based on credible and robust evidence base.

7.4 Progress on the LDF is monitored by the government through the Local Development Schemes and Annual Monitoring Reports produced by the Strategic Planning Team, this progress currently affects the amount of planning delivery grant the council receives.

8. CUSTOMER IMPLICATIONS

8.1 Endorsing the AMR will have no direct implications on the council's customers.

9. EQUALITIES AND DIVERSITY IMPLICATIONS

9.1 There are no implications for equality and diversity.

10. VALUE FOR MONEY IMPLICATIONS

10.1 There are no implications regarding value for money.

11. CLIMATE CHANGE AND CARBON IMPLICATIONS

11.1 The AMR assesses the environmental quality of the District by recording changes in areas of biodiversity importance and areas designated for their intrinsic environmental value. This allows the Council to assess where negative impacts have taken place within the environment in order for them to be rectified. The AMR also records the amount of renewable energy that is generated through new planning applications each year in order to see what is being done across the District to combat climate change.

11.2 These environmental indicators enable the Council to prepare and/or adapt to the risks and opportunities of climate change by specifying where areas are most at threat. Monitoring applications that were considered to have significant impacts on biodiversity and subsequently implementing planning conditions, allows the Council to see if advice from the Worcestershire Wildlife Trust is being utilised to full effect.

12. OTHER IMPLICATIONS

Procurement Issues	None
Personnel	None

Governance/Performance Management	None
Community Safety including Section 17 of Crime and Disorder Act 1998	None
Policy	The AMR forms part of the evidence base for the LDF and therefore will help in the development of future policies.
Biodiversity	Monitoring will enable the development of future policies for the environment.

13. OTHERS CONSULTED ON THE REPORT

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

14. WARDS AFFECTED

All wards.

15. APPENDICES

Appendix 1 Annual Monitoring Report 2008/09

16. BACKGROUND PAPERS

None.

CONTACT OFFICER

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Bromsgrove District Council
Draft Annual Monitoring Report
2008/09

Executive Summary

The Annual Monitoring Report (AMR) is prepared by Bromsgrove District Council each year in accordance with the requirements of the new development plan system. It aims to monitor the policies and proposals that have been adopted and determine the effects they are having and then modify or replace the policies and proposals deemed necessary. Over the last two years the AMR has had to take into account the new government advice; Regional Spatial Strategy and Local Development Framework: Core Output Indicators - Update 2/2008.

Below is a summary of the key findings for the 2008-2009 AMR.

Local Development Scheme

The Local Development Scheme (LDS) was revised and adopted back in March 2008; therefore the majority of Development Plan Documents have met their milestones and targets. However, some delays existed due to the Phase Two revision of the RSS, which only saw the panel report published on Monday 28th September 2009. Therefore small delays have occurred to the timetable of the Core Strategy and Town Centre AAP, as well a major delay to the Affordable Housing SPD, as the Council felt the updated housing figures within the RSS revision were needed to progress adequately. A draft document went to consultation on 30th November 2009.

Business Development and Town Centres

In total, 16,787.26m² of employment land floorspace was developed during the monitoring period. This brings the total amount of employment land completed from 2006 (the beginning of the plan period) to 69,027.37m². The District has a stable and strong business sector with the registration of businesses significantly higher than de-registrations. The continued development of high-technology firms at locations such as Bromsgrove Technology Park is likely to promote employment growth. The former MG Rover plant is also expected to see regeneration commence as the AAP was formally adopted in April 2009.

Housing

There were a total of 159 new dwellings built in the District over the monitoring period, with 79.2 per cent of homes built at a density greater than 30 dwellings per hectare, the minimum recommendation from PPS3. The regional target for future housing provision being on previously developed land (PDL) is 76% and 68% for Worcestershire. Bromsgrove has successfully achieved high figures with 95.23% of this AMR's housing being on PDL. Of these completions, there were 98 affordable housing units, which is significantly higher than last years figure of 31 affordable housing units. This figure is considerably higher than the

Bromsgrove District Council's target of 80 per annum, which was proposed as part of the Council Plan in 2008.

Transport and Local Services

Bromsgrove District is predominantly rural leading to an over reliance on private transport. However, the majority of new development, whether commercial or residential, has been located either in or around Bromsgrove Town, or other large villages - which are the most sustainable locations in regards to public transport. All non-residential development has complied with car parking standards set out in the Local Plan. A large proportion of new residential development has been built within 30 minutes public transport time of key services, including GP surgeries, schools, employment areas, and retail centres. Future retail development will be focused in Bromsgrove Town centre through the Area Action Plan, which went through a consultation on the Issues and Options during this AMR period.

Environment

No planning applications were granted contrary to the advice of the Environment Agency to ensure developments are not taking place in locations where there is the greatest risk of flooding. No renewable energy capacity was provided within the District in the monitoring period. The conditions of Sites of Specific Scientific Interest (SSSIs) within the District are still below government targets, which aim to be rectified by 2010. One SSSI improved slightly and is no longer in a state of decline, whereas the other twelve SSSIs remained in the same condition as last year. The Council has monitored planning applications where it was considered that there would be a significant impact on biodiversity. In all granted planning permissions, biodiversity implications were considered fully and conditions established to reduce the risk of any harm.

Chapter One: Introduction

1.1 Background

The Government introduced a new system of development planning with its release of the Planning and Compulsory Purchase Act in September 2004. Under the new system the Local Development Framework (LDF) has replaced Structure Plans and Local Plans. The LDF contains a series of Local Development Documents (LDDs) that collectively delivers the spatial planning strategy for Bromsgrove District.

Review and monitoring are key aspects of the Governments 'plan, monitor and manage' approach to the planning system. They are seen as crucial to the successful delivery of the spatial vision and objectives of the LDF. The process of reviewing and monitoring will enable a comprehensive evidence base to be built against which Local Development Document policies and implementation can be assessed. It will also enable trends to be identified to which the Council can respond by producing Development Plan Documents (DPDs) or Supplementary Plan Documents (SPDs). These documents form part of the portfolio of Local Development Documents contained within the LDF.

Monitoring plays a role at the examination into DPDs. During examinations, DPDs are tested thoroughly in order to consider whether they are justified, effective and consistent with National Policy. To be justified a DPD must be founded on a robust and credible evidence base and to be considered effective a document must be able to be monitored. If the DPD is found to be unsound it will not be recommended for adoption.

1.2 What is the Annual Monitoring Report?

This document is the fifth successive Annual Monitoring Report (AMR) produced by Bromsgrove District Council since the introduction of the new planning system in September 2004. The Planning and Compulsory Purchase Act (2004) requires Bromsgrove District Council to produce an AMR and submit the report to Government Office in December on an annual basis. The AMR is a Local Development Document and forms part of the Local Development Framework. The AMR must assess:

- i) implementation of the Local Development Scheme; and
- ii) the extent to which policies in the Local Development Documents are being achieved.

As required by Planning Act and associated regulators, Bromsgrove District Council must undertake the following five key monitoring tasks:

- i) review actual progress in terms of local development document preparation against the timetable and milestones in the local development scheme;
- ii) assess the extent to which policies in the Local Development Document preparation against the timetable and milestones in the Local Development Scheme;
- iii) where policies are not being implemented, explain why and set out what steps are to be taken to ensue that the policy is implemented; or whether the policy is to be amended or replaced;
- iv) identify the significant effects of implementing policies in Local Development Documents and whether they are intended; and

v) set out whether policies are to be amended or replaced.

Source: Local Development Framework Monitoring: A Good Practice Guide, ODPM (2005, Pg.9).

This AMR covers the period 1st April 2008 to 31st March 2009. However, in some cases the timeframe has been extended to beyond March 2009 where it was considered necessary to record such information, for example, when discussing LDS timetable milestones.

1.3 Transition between the Local Plan and the LDF

Under the new planning system Local Authorities must now produce a Local Development Framework. Bromsgrove District Council is therefore in a state of transition, moving from its old style Local Plan to the new Local Development Framework. Over the past five years since the Act was introduced (Sept. 2004) work has begun producing a number of documents that will comprise the LDF.

Bromsgrove District Council's Local Plan was adopted in January 2004. The LDF will eventually replace these documents and will contain the spatial vision and objectives for the District. However, until policies are replaced, Bromsgrove District Council will continue to use the Local Plan. As a consequence, part of this AMR will focus on policies detailed in the Bromsgrove District Council Local Plan (Jan. 2004).

1.4 Monitoring of Sustainability Effects

Sustainable Development is a key theme in the new planning system. At the heart of sustainable development is the idea of ensuring a better quality of life for everyone, now and in the future. The Planning and Compulsory Purchase Act contains a statutory requirement that Local Authorities have a duty to contribute to the achievement of sustainable development. As such, the Council must produce an integrated and comprehensive sustainability appraisal covering economic, environmental and social impacts of the DPD policies contained in the LDF. Failure to perform a sustainability appraisal will make the plan unsound.

The monitoring process will be used to assess the effects of DPD policies on sustainable development. It will enable the Council to identify any unforeseen adverse effects so the appropriate mitigation measures can be implemented to alleviate any negative impacts. As we progress further with the LDF, these SA effects will be reported each year in the Annual Monitoring Report.

1.5 Methodology

The structure of this Annual Monitoring Report is as follows:

Chapter Two: Monitoring Local Development Framework Preparation

This chapter will monitor the progress in meeting the targets and milestones established in the Local Development Scheme and the need for any new documents to be introduced. It also gives an indication of any adjustments that will be required to the LDS timetable since its adoption in March 2008.

Chapter Three: Context

This chapter sets out the social, environmental and economic characteristics, as well as the key issues in respect of the Local Authority area. It also sets out the objectives of the Local Development Framework.

Chapter Four: Monitoring the Bromsgrove District Local Plan 2004-2011

This chapter sets the framework for the monitoring process and specifies the Core Output Indicators and Local Indicators used to monitor the Bromsgrove District Local Plan.

Chapters Five to Eight: Local Development Framework Indicators

These four chapters of the AMR will set out the Core Output Indicators recognised by Government Office, as well as the local indicators used by Bromsgrove District Council. The chapter headings used are:

- Business Development and Town Centres
- Housing
- Transport and Local Services
- Environmental Quality

All Local Authorities are expected to monitor the Core Output Indicators, which are considered to provide the basis for all policy monitoring. These chapters will also incorporate the local indicators to provide greater policy coverage and will reflect local circumstances. These include policy targets set out in the adopted Bromsgrove District Local Plan. It will not be possible to include an indicator for every policy in the Local Plan, as this would be impractical. Instead, policies that have data sources available for the AMR period 1st April 2008 to 31st March 2009 have been selected for monitoring purposes.

1.6 Further Information

The AMR is available for public inspection at the Council House, Customer Service Centre, and all public libraries within Bromsgrove District. It can also be viewed and downloaded on the Council's website – www.bromsgrove.gov.uk.

Further information about the LDF process and the preparation of the AMR is available in a number of Government publications. These publications are as follows:

- Planning Policy Statement 12: Local Spatial Planning (PPS12) (ODPM, 2008)
- Regional Spatial Strategy and Local Development Framework: Core Output Indicators – Update 2/2008 (ODPM, 2008)
- Local Development Framework Monitoring: A Good Practice Guide (ODPM, 2005)

For further information contact:

Bromsgrove District Council

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Whilst as much care as possible has been taken to ensure the accuracy of the information contained in this document, it is not a definitive list of planning applications determined by the Council.

Chapter Two: Monitoring Local Development Framework Preparation




2.1 Introduction



As stated in the 2004 Planning and Compulsory Purchase Act, Bromsgrove District Council is required to set out in its Annual Monitoring Report how the planning department is performing in relation to the milestones recognised in the Local Development Scheme (LDS). This chapter will set out the Council's performance and progress. It will also give an indication of any adjustments that will be required since the adoption of the LDS.




2.2 Local Development Scheme

The LDS is a vital component to the successful management of the LDF, as it sets out Bromsgrove District Council's three-year project plan. The latest version was submitted to Government office and formally adopted in March 2008 in accordance with relevant changes to the Regional Spatial Strategy. One of the roles of the Annual Monitoring Report is to assess the progress made on the LDS and, where there has been some slippage, explain why this has occurred and how the Council intends to respond.

Although the AMR is only required to cover the 12-month period 1st April 2008 to 31st March 2009, Bromsgrove District Council have also assessed the period up to December 2009 for the purposes of monitoring the targets and milestones set out in the LDS. The table below indicates the targets the Council intends to achieve within its LDF by the end of 2009. It records what was actually achieved and highlights, where necessary, where revisions will be needed to the LDS. The performance of each milestone has been rated as follows:

	Excellent - Indicates that the milestone has been reached, or that slippage has not been by more than three months
	Fair - Indicates that the milestone was not met, and slippage has been by more than three but not more that six months.
	Poor - Indicates that the milestone was not met, and slippage has been more than sixth months

LDS Target: By Dec 2009	What was achieved: By Dec 2009	Delay	Rating
Annual Monitoring Report			
Submission to government office	Submitted	None	
Core Strategy			
Consultation of Draft Core Strategy, Submission to the Planning Inspectorate and Consultation of Submission Document. Also the commencement of the	Consultation on the Draft Core Strategy was completed from October 2008 to February 2009. The document was not submitted	3-6 months	

Examination Period	to the Planning Inspectorate or an EiP undertaken		
Longbridge Area Action Plan			
Commencement of the Examination Period, Receipt of the Binding Report, and Adoption	The Examination ended in December 2008, and the AAP published on 10 th February 2009, before being formally adopted on 29 th April 2009.	2-3 months	
Affordable Housing SPD			
Preparation of Issues and Options and Adoption	Draft document prepared and published, consultation began on 30 th November 2009	6+ months	
Town Centre AAP			
Preparation of Issues and Options, as well as consultation on Preferred Options	Issues and Options prepared and consulted from June to October 2008	3-6 months	

Annual Monitoring Report

Bromsgrove District Council submitted the Annual Monitoring Report for the period 1st April 2008 to 31st March 2009 to Government Office in December 2009. The Council therefore considers performance against this milestone to be **excellent**.

Core Strategy

Work began on the Core Strategy in accordance with the timetable set out in the LDS. Following on from an Issues and Options consultation in 2007, this AMR period has led to the production of a Draft Core Strategy that went to consultation from 31st October 2008 to 16th February 2009. During this AMR period, there have been various forms of technical work conducted in order to support the Core Strategy, including a Strategic Flood Risk Assessment, Strategic Housing Land Availability Assessment, and ongoing meetings with a wide range of key stakeholders. However, due to the revision of the RSS Phase 2, an increase in housing figures and issues associated with Redditch has delayed the process of the Core Strategy. Although this was beyond the control of Council, the slippage has been greater than three months and therefore performance against this milestone is deemed **fair**.

Longbridge Area Action Plan

Bromsgrove District Council, Birmingham City Council and Worcestershire County Council worked together on preparing an Area Action Plan for the former MG Rover works at Longbridge. The revised LDS in 2008 took into account delays that took place due to resource issues, and has subsequently progressed significantly. The Public Examination began in November 2008 and was completed on 4th December 2008. The examination was adjourned during this period to allow further evidence to be produced. The Planning Inspectorate published the full report into the Longbridge Area Action Plan on the 10th February 2009. The plan was judged sound subject to some minor amendments. These amendments have now been made and the plan was formally adopted by both Bromsgrove District Council and Birmingham

City Council on the 29th April 2009 as the development plan for the former MG Rover site. The minor delays encountered were out of the hands of Bromsgrove District Council and therefore the Council feels progress of this milestone is **excellent**, as it was due to unforeseen circumstances.

Affordable Housing SPD

A draft Affordable Housing SPD has been published and went to consultation on 30th November 2009. There has been a significant delay from the LDS timetable, which expected adoption in February 2009. The Council felt there was no need to progress the Affordable Housing SPD as the District was in a position of oversupply in terms of housing and a moratorium was enforced. The RSS Panel Report was published on 28th September 2009, which allocated an increased from 2,100 to a figure of 4,000 dwellings for the District over the plan period (2006-2026). The Council is no longer in a position of oversupply; therefore, it is imperative affordable housing provision is sought from market housing. The LDS will be revised to take into account the delay. For the purpose of this AMR, this milestone has been rated as **poor**, as its completion has been by longer than six months.

Town Centre AAP

Bromsgrove District Council is committed to regenerating the Town Centre in order to do this it is preparing an Area Action Plan to help guide the process. This AMR period has seen the completion of the Issues and Options, although has failed to consult on a Preferred Options document, failing to reach the intended target set in the LDS. This slippage has not been by more than six months and therefore the Council assesses this milestone progression as **fair**.

2.3 Adjustments to the Local Development Scheme Timetable

The LDS was adopted fairly recently (March 2008), and has satisfied the timescales set for the majority of milestones. However, some delays occurred in some LDDs, mainly due to the Phase 2 revision of the RSS. This situation could not be avoided, although the following changes are proposed to the LDS in respect of achieving milestones:

- Delaying the submission to Inspectorate of the Core Strategy due to the revision of the RSS;
- Revised timetable of the Draft Affordable Housing SPD;
- Revised timetable of the Town Centre AAP.

Chapter Three: Context

The monitoring process involves assessing the extent to which planning policies are being achieved. In order to develop an understanding of how successful planning policies have been, it is first necessary to develop an understanding of the key characteristics, issues, challenges and opportunities of the area. In July 2005 Bromsgrove District Council published its Sustainability Appraisal Scoping Report which has since been updated in August 2008. The Scoping Report involved survey and evidence gathering to develop a sound understanding of current and future local issues and needs in order to prepare robust and effective plans. The information collected was used to decide on the spatial vision and spatial objectives for the District. The original SA was updated in 2008 to accurately reflect the District and provide a basis for the Draft Core Strategy. This chapter will use the Sustainability Appraisal Scoping Report combined with more recent data to provide contextual information for the Bromsgrove District.

3.1 District Profile

Bromsgrove District is situated in north Worcestershire lying to the south west of the West Midlands conurbation. The District is bounded by Birmingham, Dudley, Solihull, Redditch, Wyre Forest, and the largely rural districts of Wychavon and Stratford-on-Avon. The District covers approximately 21,714 hectares. Although located only 22km (14 miles) from the centre of Birmingham, the District is predominately rural with approximately 91% of the land designated Green Belt.

The area is well served by motorways, with the M5 running north to south and the M42 from east to west. The M5 and M42 connect with the M6 to the north of Birmingham and the M40 to the east. The District also benefits from train and bus connections into Birmingham City Centre.

The main centres of population in Bromsgrove District are Bromsgrove, Wythall, Hagley, Rubery and Catshill. Development pressures are high due to the District's proximity to the Birmingham conurbation and the motorway and railway connections. This adversely puts pressure on the Green Belt.

3.2 Characteristics of District

This section will outline the main characteristics of Bromsgrove District that have been identified in the Sustainability Appraisal Scoping Report. Following the detailed approach identified in the Scoping Report, the District's characteristics are divided into social, environmental and economic issues.

3.3 Social Characteristics

In 2009 Bromsgrove District has a projected resident population of 92,300, which is fairly balanced between men (49.4%) and women (50.6%). At the time of the 2001 Census Bromsgrove District had a population of 87,837, indicating that Bromsgrove's population has increased by approximately 4,463 over the last eight years. Projections for the District anticipate the total population will reduce slightly to 89,600 by 2016 and 87,100 by 2026. The average age of residents is 40.7 years, which is slightly higher than the national average of 38.8 years (*National Statistics mid-2007*). In 2006, 34% of the

population was over the age of 60 and almost 18% under the age of 15. Therefore, these statistics signify a rising population in the District with a slightly older population than the national average. This could have an impact on service delivery, including, accessible transport options for the less mobile and suitable housing needs for the elderly. The majority of Bromsgrove's population are white Caucasian (94.1%) compared to 88.2% across England (*National Statistics mid-2007*).

When compared to the rest of Worcestershire, Bromsgrove District has the lowest instances of deprivation, and ranks in the bottom fifth of most deprived local authorities across England (299th out of 354 authorities). However, there are small pockets of deprivation that need to be tackled. The most deprived area in the District is the northern part of Sidemoor, which is ranked, 8,558th out of 32,482 most deprived areas nationally (*DCLG Indices of Multiple Deprivation 2007*).

Bromsgrove District is considered to be a safe place to live, with levels of crime being lower than the regional and national figures. Vehicle crime and criminal damage are the most common offences, illustrating there is still a fear of crime that needs to be addressed.

The housing market in the District has been buoyant in recent years due to its close proximity to the West Midlands conurbation. Although due to the current economic climate house prices have fallen 13.6% in the District over the past year, they are still relatively high compared to the rest of the West Midlands. In 2009 the average house price was £213,232 compared with £139,146 in neighbouring Birmingham, and the West Midlands average of £160,866 (*Land Registry 2009*).

At the time of the 2001 Census there were 35,168 dwellings in the District. From this total, 29,136 were owned, 2,178 privately rented or people living rent free, 138 shared ownership, and 3,716 were social rented. The majority of people in the District live in households (98%), while the remainder of people (2%) live in communal establishments. Household tenure is dominated by the owner-occupied sector with a total of 83% of the properties in the District being owner-occupied. This figure is significantly higher than Worcestershire (75%) and across England (68%) (*2001 Census*). The Council's social rented housing stock has been transferred to Bromsgrove District Housing Trust, which is a Registered Social Landlord (RSL). Social housing now accounts for 11% of the District's housing stock, which is below the national average of 19%.

Since 2003 Bromsgrove District has been facing an oversupply of housing. In July 2003 the Planning Department introduced Supplementary Planning Guidance Note 10: Managing Housing Supply in the District of Bromsgrove. SPG10 issued a housing moratorium limiting the numbers of market housing being allowed in the District. The current preferred options of the RSS Phase 2 revision states 4,000 new homes will need to be provided in Bromsgrove between 2006 and 2026. The Draft Core Strategy contains a number of policies that strive to deliver these houses over the period, however, until the Core Strategy has been adopted, housing supply will continue to be strictly controlled.

Education in Bromsgrove is administered by Worcestershire County Council, which controls 27 schools in the District. These include: fifteen first, five middle, two high schools and five special schools. There are also independent schools such as The Bromsgrove School. Over the last decade, demand for school places has increased by

18.75%, due to the considerable development in the area created by Bromsgrove's convenient location on the M5 corridor and its boundary with the major Birmingham conurbation.

In 2005 Worcestershire County Council received approval for a £60 million PFI bid to help fund the rebuilding of seven of the District's schools, in order to accommodate the extra demand now being placed upon them and is seen as a way of streamlining the education system.

3.4 Environmental Characteristics

The landscape within Bromsgrove is a major attraction. It is dominated by the Lickey and Clent Hills which form a natural barrier between the District and the West Midlands conurbation. The rest of the District is characterised by farmland, small woodlands and fragments of urban development. The main concentration of urban form in the District is Bromsgrove Town, which sits at the bottom of the Lickey Hills. The landscape of the District provides swathes of open countryside, immediately adjacent to the dense urban form of the West Midlands conurbation. The mixture of rural and urban environments provides a rich biodiversity across the District.

There are currently five Landscape Protection Areas within the District, which include the Clent and Lickey Hills, as well as the Birmingham and Worcester Canal. These Landscape Protection Areas identify places where the landscape forms an important element of local and regional importance. The District has eight sites of Special Scientific Importance (SSSIs), which are in various states of recovery, decline or stability. There are also ninety-six Special Wildlife Sites (SWS) and a number of smaller localized sites such as ponds, marshes and streams. These all serve as important habitats for many species of plants and animals. Public accessibility must be monitored so as not to harm these important landscape features.

The District has a high dependence on car ownership compared to national statistics. The number of people traveling to work by car (68%) is higher than the national average (55%). This is due to the District's close proximity to the West Midlands conurbation and the employment opportunities it provides. Also, the District's excellent motorway and 'A' road network contribute to the high dependency on car use. Improvements will need to be made to public transport infrastructure to encourage people to use alternative modes of transport.

Although the District benefits from an excellent road system, it does experience environmental problems caused by high traffic volumes. In 2003, the Council designated junction 1 of the M42 as an Air Quality Management Area (AQMA) due to its high levels of Nitrogen Dioxide (NO₂). The AQMA consists of a number of proposals to try to improve the air quality in this part of the District.

The measure of whether the Council has achieved better air quality is the designation of no more air quality management areas and achieving the targets set out in the Air Quality Management Action Plan. However, there are limits to what can be done to reduce vehicle pollution within the District due to the presence of two motorways and a number of 'A' roads. These main traffic routes also pose problems with noise pollution for local residents. Noise pollution from traffic can be reduced by using better road

treatments, barriers and through traffic calming measures. Localised pollution is also caused by closed landfill sites.

New development is being concentrated on brownfield sites to protect the openness of the greenbelt and ensure the quality of the environment and important areas of biodiversity in the District are protected.

The District has over 470 Listed Buildings and 839 known Sites of Archaeology Interest, 10 of which are Scheduled Ancient Monuments. There are also 10 Conservation Areas that are designated as being areas of special architectural or historic interest; these are Hagley Park and Hewell Park. A current program of carrying out conservation area appraisals and subsequently producing management plans will add this already extensive knowledge of the rich history that exists in Bromsgrove.

3.5 Economic Characteristics

The dominant industry in Bromsgrove District, in terms of the percentage of employees, is the Public Administration, Education and Health sector. Due to the District's close proximity to the West Midlands conurbation, many inhabitants in Bromsgrove commute to work in Birmingham.

Due to the current economic climate, unemployment levels have increased significantly in Bromsgrove to 4% of the population unemployed for the three months to August 2009, although this compares favourably to the national average of 7.9% over the same period (Worcester County council, 2009; ONS, 2009). The average annual earnings of people who work within the District is £19,444, which is lower than the West Midlands average £22,540 and the national average £24,204 (ASHE, 2007). Conversely, the average annual earnings for residents in Bromsgrove District is £28,371, which is considerably higher than the West Midlands average £22,546 and the national average £24,242 (ASHE, 2007). This would suggest that the District's population earn higher salaries than average, but they earn them in employment locations outside the District. Therefore, it appears that there is an imbalance between the types of jobs and pay available within Bromsgrove compared with the average wages of the population. Industries with higher paid jobs need to be encouraged to stay or locate in the District so as to correct this imbalance and reduce the daily flow of the population to other employment centres which is unsustainable.

A High Technology Corridor known as the Central Technology Belt runs through Bromsgrove District. The corridor stretches from Birmingham in the north to Malvern in the south. The intention is to provide the infrastructure and design quality that will attract technologically innovative businesses to such a location. In January 2006 work began on Bromsgrove Technology Park, which is expected to create approximately 700 jobs. The 9 hectare (23 acre) site was formerly housed by Garrington Forgings.

Buntsford Gate located on the A38, is a 9 hectare (23 acre) site that contains a mixture of top quality offices that appeals to professional and service industries. Ravensbank Business Park is a 18 hectare (44 acre) site located near to Redditch. It comprises of warehousing and manufacturing units, which serve most of Western Europe and create around 300 jobs. There are also a number of office developments on site.

There are two major areas of economic concern within the District – the redevelopment of Longbridge and Bromsgrove Town centre. Both areas are subject to Area Action Plans in order to stimulate the growth of the areas.

In Longbridge, the MG Rover car plant closed in April 2005. Approximately 5,850 jobs were lost and an estimated £410 million was lost to firms based in the West Midlands as part of the supply chain. Although the Districts employment levels did fluctuate with the closure of the plant, unemployment levels have returned to a low of 1.6%. The Longbridge Area Action Plan (AAP) intends for 10,000 jobs, over 1,450 new homes, built to high environmental standards, a new local centre to provide a wide range of retail, leisure, commercial and community facilities and a series of public transport and highway improvements. The overall aim of the plan is to create a truly sustainable and well designed community. The current AMR period has seen the Longbridge AAP materialize somewhat, with the conclusion of the hearing sessions of the Examination in Public (December 2008), whereby the inspectors report judged the plan sound, and the adoption of the AAP in April 2009.

The District's retail activity is focused on Bromsgrove Town centre, which currently has approximately 370 different businesses operating in a variety of different sectors. There are a number of alternative shopping centres relatively close to Bromsgrove with a wider range of shops and facilities, including Redditch (8 miles), Birmingham (16 miles), Worcester (14 miles) and Merry Hill (14 miles). While Bromsgrove has its own attractions, trade is lost to such centres in neighbouring areas. Bromsgrove District Council is committed to regenerating the Town Centre, and has prepared an AAP in order to do this. During the current AMR period the Bromsgrove Town Centre AAP has been prepared and consultation has taken place on its issues and options. It is hoped the plan will progress significantly next year.

3.6 Key Issues

The Sustainability Appraisal Scoping Report identified a number of environmental and sustainability issues from its baseline study and assessment of national, regional, and local plans and strategies. The key issues that need to be tackled by the LDF are detailed below:

- Rising older population
- Meeting the government targets for new housing and employment land
- Barriers to housing and services in rural areas
- Large identified Greenfield sites for future development needs
- An increase in young residents leaving in search of work and housing
- Reducing fear of crime
- Under-provision of affordable housing
- Implications of redeveloping brownfield sites
- High car usage and congestion
- Local public transport needs improvement
- Commuting out of the district
- Local facilities to meet the needs of the population
- Responding to climate change
- Air quality
- Changing economy

- Degradation of the natural and built environment
- The revival of the town centre as well as regeneration at Longbridge
- Keeping the sense of community 'alive'

3.7 Objectives of the Local Development Framework

The objectives for the Local Development Framework are outlined below. These objectives were developed using evidence from the baseline characterization study set out in the Sustainability Appraisal Scoping Report, and an analysis of national, regional, and localised plans and policies.

Social Objectives

- Create communities where people want to live, work and socialise
- Meet the housing requirements of all members of the community
- Ensure the community has accessible healthcare
- Provision of leisure and educational facilities to meet the needs of the community
- Better quality of life through a safer and better designed urban and rural environment
- Promote thriving, balanced, inclusive and sustainable rural communities
- Ensure all members of the community have a viable choice of transport options
- Seek an improvement in retail opportunities and choices throughout the District.

Environmental Objectives

- Protect our existing special natural environment
- Promote biodiversity enhancement
- Conserve and enhance the historic environment
- Enhance existing conservation areas
- Seek to identify and protect further areas of historical and natural importance
- Seek to reduce travel and promote an improvement in sustainable transport options
- Promote efficient use of the earths resources and promote renewable energy
- Maintain the principles of Green Belt designation

Economic Objectives

- Maintain a high and stable level of employment by supporting economic modernisation
- Improve peoples' access to job opportunities in new technologies
- Ensure opportunities for growth are linked to meeting the needs of the community
- Enable schemes that promote sustainable tourism
- Ensure sufficient sites are provided to ensure sustainable economic growth
- Provide positive support towards rural diversification
- Encourage cross-border economic linkages

Chapter Four: Monitoring the Bromsgrove District Local Plan 2004-2011

4.1 Introduction

Monitoring of housing and employment development has always been a key feature when monitoring Local Plan performance. However, more recently, councils are expected to undertake monitoring of other key developments that include retail, leisure and transport. The 2004 Planning and Compulsory Purchase Act requires local planning authorities to take a more dynamic approach to monitoring in order to appreciate the wider social, economic and environmental issues affecting their areas. The Act also promoted the effectiveness planning policies has on spatial change, and the monitoring process has adapted to acknowledge this.

This Annual Monitoring Report monitors the Bromsgrove District Local Plan against the Government's Core Output Indicators, the Council's corporate objectives and key targets from planning policy documents. In July 2008, the Government published a new amended set of Core Output Indicators, which are reflected throughout this AMR. Bromsgrove District Council has used these indicators as the basis for monitoring, but will also include a number of local indicators that are relevant to the District. The structure of this AMR was amended slightly in 2008 to reflect the updated Core Output Indicators.

4.2 Core Output Indicators

The core output indicator topics chosen for Bromsgrove District Council's Annual Monitoring Report 2009 are as follows:

- Business Development and Town Centres
- Housing
- Environmental Quality

The Core Output Indicators follow the guidelines set out in the LDF Monitoring: Good Practice Guide (ODPM, 2005). They will also take into account the Regional Spatial Strategy and Local Development Framework Core Output Indicators – Update 2/2008. The main purpose of the Core Output Indicators is to measure quantifiable physical activities that are directly related to, and are a consequence of, the implementation of planning policy. For chapters five to eight of the Annual Monitoring Report, these indicators will be used as chapter headings with the relevant data presented under each heading. The Core output indicators used are:

Business Development and Town Centres

BD1: Total amount of additional employment floorspace – by type (B1, B2, B8)

BD2: Total amount of employment floorspace on previously developed land – by type (B1, B2, B8)

BD3: Employment land available – by type (B1, B2, B8)

BD4: Total amount of floorspace for 'town centre uses'

Housing

H1: Plan period and housing targets

H2 (a): Net additional dwellings – in previous years

H2 (b): Net additional dwellings – for the reporting year

H2 (c): Net additional dwellings – in future years

H2 (d): Managed delivery target (Housing Trajectory)

H3: New converted dwellings – on previously developed land

H4: Net additional pitches (Gypsy and Traveller)

H5: Gross affordable housing completions

H6: Housing Quality – building for life assessments

Environmental Quality

E1: Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds

E2: Change in areas of biodiversity importance

E3: Renewable energy generation

4.3 Local Indicators

These address the outputs of policies not covered by the Core Output Indicators. Local Plan policies are implemented through the Development Control process. In measuring the extent to which objectives are being met, these sets of indicators will serve to identify where policies need to be strengthened, maintained, changed, or, if necessary, removed from the plan. The majority of the local indicators will be incorporated as a supplement to the Core Output Indicators. However, there will be two new headings; Transport and Travel, as well as Local Services. The Local Indicators used are:

L1: Total amount of additional employment floorspace in development and/or regeneration areas defined by LDF – by type (B1, B2, B8)

L2: Losses of employment land in:
(a) development/regeneration area
(b) Local Authority area

L3: Amount of employment land lost to residential development

L4: VAT Registered businesses – registrations/deregistrations

L5: Percentage of new dwellings completed at:

- (a) less than 30 dwellings per hectare
- (b) between 30 and 50 dwellings per hectare
- (c) above 50 dwellings per hectare

L6: Percentage of completed non-residential development complying with car parking standards set out in the Local Development Framework

L7: Percentage of new resident development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre

L8: Amount of completed retail, office and leisure development respectively

L9: Amount of completed retail, office and leisure development respectively in town centres

L10: Amount of eligible open spaces managed to green flag award standard

Chapter Five: Business Development and Town Centres

For the purposes of this Annual Monitoring Report, employment land relates to business, industrial, storage and distribution uses only, as defined by classes B1, B2 and B8 of the Town and Country Planning (Use Classes) Order 1987. The Council's methodology for employment monitoring only includes sites over 2,000sqm.

BD1: Total amount of additional employment floorspace – by type (B1, B2, B8)

Use Class Orders	Amount (m ²)
B1	2567.26
B8	2290
B1, B8 (Permission granted for both uses)	4000
B1, B2, B8 (Permission granted for all three uses)	7930
Total:	16,787.26

Applications solely for B1 uses (Offices)

Application	Description	Site Area (m ²)
B/2005/1167	Land at Westonhall Road, Stoke Prior	2567.26
	Total:	2,567.26

Applications solely for B8 uses (Storage and Distribution)

Application	Description	Site Area (m ²)
B/2006/1080	Unit 8, Buntsford Park Road	2290
	Total:	2,290

Applications for B1 and B8 uses (Offices, Storage and Distribution)

Application	Description	Site Area (m ²)
B/2005/0363	Plot 4C, Buntsford Hill, Buntsford Business Park	4000
	Total:	4,000

Applications for B1, B2, & B8 uses (Offices, General Industrial & Warehouses)

Application	Description	Site Area (m ²)
B/2006/1080	Clements & Street Ltd, Harris Business Park	7930
	Total:	7,930

L1: Total amount of additional employment floorspace in development and/or regeneration areas defined by LDF – by type (B1, B2, B8)

Applications solely for B8 uses (Storage & Distribution)

Application	Description	Site Area (m ²)
B/2006/1080	Unit 8, Buntsford Park Road	2290
Total:		2,290

Applications for B1 and B8 uses (Offices, Storage and Distribution)

Application	Description	Site Area (m ²)
B/2005/0363	Plot 4C, Buntsford Hill, Buntsford Business Park	4000
Total:		4,000

Applications for B1, B2, & B8 uses (Offices, General Industrial & Warehouses)

Application	Description	Site Area (m ²)
B/2006/1080	Clements & Street Ltd, Harris Business Park	7930
Total:		7,930

There was a total of **14,220m² (1.42ha)** of land which significant employment development has taken place on sites designated in the Local Plan for new employment development, or sites where an existing employment use is present. This was **84.7%** of all employment development for this AMR period.

Figure 1: Annual employment land completions 1st April 2006 – 1st April 2009 (Excluding land allocated at Ravensbank Business Park, Redditch)			
Year	Commitments (m ²)	Windfalls (m ²)	Total Completions (m ²)
April 2006 – March 2007	22,060.97	3,754.6	25,815.57
April 2007 – March 2008	16,915.33	9,509.21	26,424.54
April 2008 - March 2009	16,787.26	0	16,787.26
TOTAL:	55,763.56	13,263.81	69,027.37

The revision of the RSS Phase 2 indicates through Policy PA6A that Bromsgrove District should make provision for a rolling five year supply of 7ha of readily available employment land with an indicative longer term requirement of 28ha employment land up until 2026.

Figure 1 shows that the 28ha required as an indicative long-term requirement of readily available employment land from 2006 until 2026, development has already been completed on 6.9ha of land since 2006. This is 24.6% of the District's total employment land requirement.

BD2: Total amount of employment floorspace on previously developed land – by type (B1, B2, B8)

Application	Description	Use	Site Area (m ²)
B/2005/0363	Plot 4C, Buntsford Hill, Buntsford Business Park	B1, B8	4000
B/2005/1167	Land at Westonhall Road, Stoke Prior	B1	2567.26
B/2006/1080	Clements & Street Ltd, Harris Business Park	B1, B2, B8	7930
B/2006/1080	Unit 8, Buntsford Park Road	B8	2290
Total:			16,787.26

There was a total of **16,787.26m²** of employment built on previously developed land, which equates to **100%**.

BD3: Employment land available – by type (B1, B2, B8)

Employment Land Not Started 1st April 2008 – 31st March 2009

Application No.	Site Address	Parish	Commitment	Use Classes	Area (m ²)
99/0316	Aston Road Extension, Plot 5 (B)	Bromsgrove	Not Started	B2	3000
02/0932	Aston Road Extension	Bromsgrove	Not Started	B1	4000
2003/0624	Barnsley Hall Farm	Bromsgrove	Not Started	B1	5205.96
2002/1014	Former Garringtons / UEF works	Bromsgrove	Not Started	B1, B2	73050
B/2006/0120	Bromsgrove Technology Park, Unit 2	Bromsgrove	Not Started	B1, B2	2000
B/2007/1082	Bromsgrove Technology Park, Plot 2	Bromsgrove	Not Started	B1	2450
B/2007/0704	Buntsford Business Park, Land Adjacent Sugar Brook Mill	Bromsgrove	Not Started	B2	4400
B/2006/1249	Buntsford Gate Business Park, Plot 3A	Bromsgrove	Not Started	B1	3746
98/0850	Buntsford Hill - Phase 3 - Buntsfordgate	Bromsgrove	Not Started	B1, B2, B8	3513.83
B/2005/0377	Harris Business Park, Plot 19	Stoke Prior	Not Started	B8	3100
B/2006/0791	Harris Business Park, Unit A	Stoke Prior	Not Started	B1, B2, B8	2800
97/0839	Harris Business Park - Phase 2	Stoke Prior	Not Started	B1, B2, B8	2000
2004/0240	High House Farm	Beoley	Not Started	B2	4862.51
98/0192	Land Rear of Sugarbrook Mill	Bromsgrove	Not Started	B1, B2, B8	6000

99/0752	Lower Shepley Farm, Littleheath Lane	Lickey & Blackwell	Not Started	B1, B2, B8	2000
2003/1447	Nash Works	Belbroughton	Not Started	B1, B2, B8	3531
B/2007/0411	Saxon Business Park, Plot 8, Phase 4	Stoke Prior	Not Started	B1, B2, B8	2832
B/2007/0689	Saxon Business Park, Plot 5, Phase 2	Stoke Prior	Not Started	B1, B2, B8	5000
2003/1456	84 Staple Flat	Lickey & Blackwell	Not Started	B8	3000
96/0203	Stoke Wharf	Stoke Prior	Not Started	B1, B2, B8	3000
B/2005/0352	Wildmoor Mill Farm, Mill Lane	Belbroughton	Not Started	B1	7565.08
01/0379	Wildmoor Mill Farm, Mill Lane	Belbroughton	Not Started	B1, B2, B8	7509.21
B/2006/0146	Wythall Green Business Park	Wythall	Not Started	B1, B2, B8	65000
				Total	219,565.59

Employment Land Under-Construction 1st April 2008 – 31st March 2009

Application No.	Site Address	Parish	Commitment	Use Classes	Area (m ²)
00/1027	Buntsford Hill - Phase 3 - Buntsfordgate, Plot E	Bromsgrove	Under Construction	B1, B2, B8	13200
01/1379	Buntsford Hill - Phase 3 - Buntsfordgate	Bromsgrove	Under Construction	B1, B2, B8	7519.51
99/1159	Saxon Business Park - Phase 4	Stoke Prior	Under Construction	B1, B2, B8	11000
B/2007/1225	Bromsgrove Technology Park, Plots 3, 4 & 10	Bromsgrove	Under Construction	B1	18490
				Total	50,209.51

Employment Land Supply 1st April 2006 – 31st March 2009

	Square Metres (m ²)	Hectares (ha)
Remaining Allocations (BROM6)	18,000	1.8
Completions - April 2009	69,027.37	6.9
Sites under construction - April 2009	50,209.51	5.02
Sites with planning permission not started - April 2009	219,565.59	21.96
RSS Target	280,000	28
Total Employment Land April 2006 - April 2026	356,802.47	35.68

At 1st April 2009 a total of **26.98 hectares (ha)** of land was available with planning permission (either with outline or detailed permission) for employment

development within Bromsgrove District. As the table above indicates, 21.96ha were not started and 5.02ha were under construction. This consisted of 13.49ha of mixed B1/B2/B8 uses, 7.5ha of mixed B1/B2 uses, and 4.12ha for B1 use, 1.23ha for B2 use and 0.6ha for B8 use. Since 2006 (The beginning of the RSS period) there have been 6.9ha of completed development, which combined with the land not yet completed, equates to 33.88ha against the RSS target of 28ha for Bromsgrove District between 2006 and 2026. A further 1.8ha of employment land is allocated in the form of BROM6 - a site identified within the District Local Plan. This brings the total employment land supply within Bromsgrove District to 35.68ha, which if all complete, would exceed the RSS target up until 2026.

BD4: Total amount of floorspace for ‘town centre uses’

There were no completed developments or additional floorspace within the Town Centre Zone that was identified in the Bromsgrove District Council Local Plan for this AMR period.

L2: Losses of employment land in (a) development/regeneration area, and, (b) local authority area

There were no losses of employment land in either employment/regeneration areas or the local authority area for this AMR period.

L3: Amount of employment land lost to residential development

There was no employment land lost to residential development with the District for this AMR period.

L4: VAT Registered businesses – registrations/deregistrations

Figure 2 shows the number of VAT registered businesses in Bromsgrove District. VAT registered businesses are an indicator of the health of the business population. In 2007, Bromsgrove District had significantly more registrations than deregistrations. The number of registrations was almost equal to the national and above regional levels, which implies that the business economy is relatively strong.

Figure 2: VAT registered businesses

Percentages are based on stock (at end of year)

	Bromsgrove (numbers)	Bromsgrove (%)	West Midlands (%)	GB (%)
Registrations	390	10.0	9.4	10.2
Deregistrations	250	6.4	7.2	7.3
Stock (at end of year)	3,905	-	-	-

Source: Nomis – VAT Registrations/Deregistrations by Industry (2007)

Relevant Local Plan Policy

Policy E7: Development Briefs will normally be required for all new employment land sites exceeding 2 hectares [5 acres] in size. Where required these will have to be agreed with the Local Planning Authority.

The method established in Policy E7 was used effectively at the Breme Park site. The 'Breme Park Implementation Brief' has helped to establish a well conceived vision into reality. The technology park has spatial links with the West Midlands and forms part of the Central Technology Belt that follows the A38 between Birmingham and Worcestershire. The region is rich in high calibre graduates from local universities and this will help to support the diversification of the regions' manufacturing industry into new technology-rich sectors. The implementation and design briefs have helped to attract firms such as Basepoint, Chase Commercial and West Midlands Contracts. There has been significant progress on the technology park and it is likely to be fully committed within the next two years.

The deleted Policy E2 is particularly concerned with employment land for Redditch needs, a topic which is becoming even more recognisable in regards to the new figures established by the RSS Phase Two Revision. The revised RSS proposes that Bromsgrove and/or Stratford-on-Avon Districts accommodate an 8ha rolling five year reservoir employment for Redditch's needs, as well as a 32ha indicative long-term requirement employment land provision. At present this matter has been mainly implemented through development at Ravensbank Business Park, which is located close to the border of Redditch Borough.

Chapter Six: Housing

At the 2001 Census, the number of resident households in Bromsgrove District was 35,168.

Housing (all households)	Value	Eng & Wales Rank/376 (proportion)	Regional Rank/34 (proportion)
Number of households with residents	35,168	286	26
Number of people per hectare	4.0	212	18
Average household size	2.44	59	9
Vacant household spaces	755	326	30
Owner-occupied	29,316	11	2
Without central heating	1,539	281	34
Without own bath/shower & toilet	35	375	34
Overcrowding indicator	954	359	34

Source: Office for National Statistics (Revised February 2003)

H1: Plan period and housing targets

Emerging Regional Spatial Strategy (Phase Two Revision Preferred Option) 2006 – 2026 (December 2007)

Housing Proposals (Net)		
Time Period	Indicative Annual Average	Proposed Total
2006-2026	105	2,100

Emerging Regional Spatial Strategy (Phase Two Revision) 2006 – 2026
(As of Panel Report October 2009)

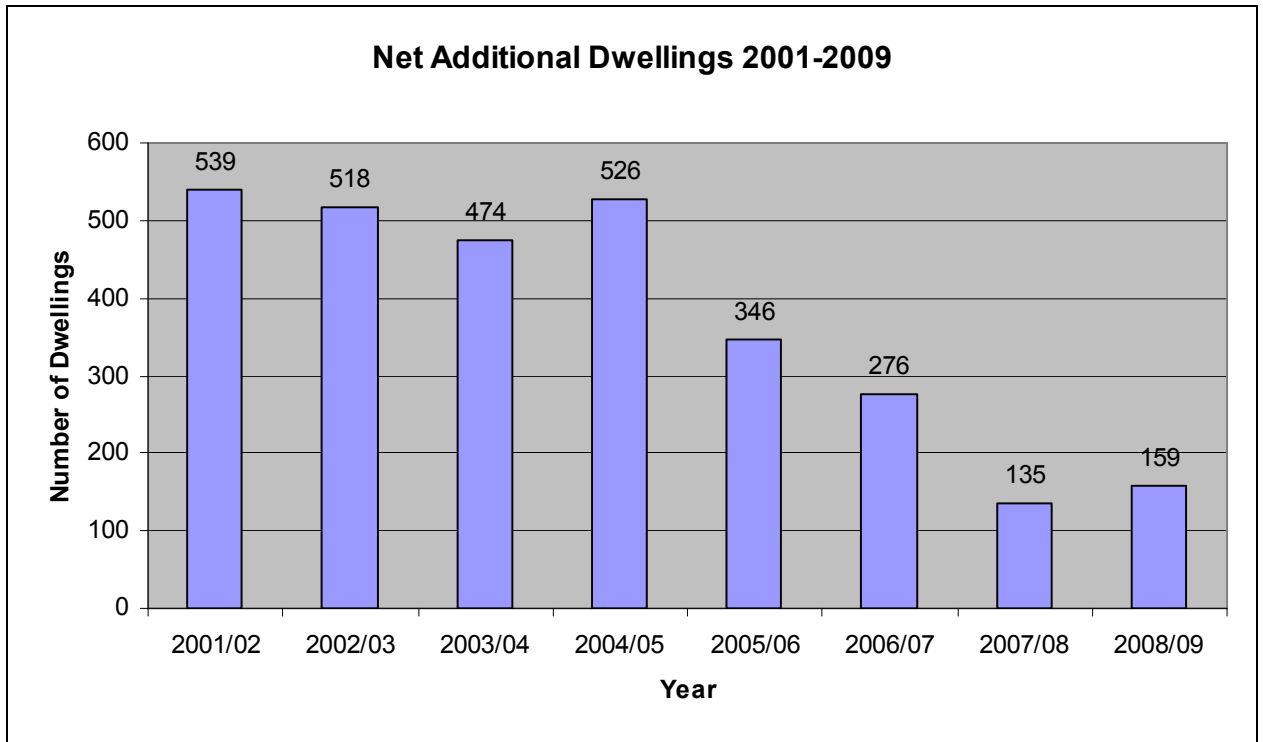
Scenario One

Housing Proposals (Net)		
Time Period	Indicative Annual Average	Proposed Total
2006-2026	200	4,000

Scenario Two

Housing Proposals (Net)		
Time Period	Indicative Annual Average	Proposed Total
2006-2021	266.7	4,000
2022-2026	600	3,000
2006-2026	350 (average)	7,000

H2: Net additional dwellings: (a) in previous years
(b) for reporting year



There has been an average of 371.63 net additional dwellings since 2001, which is a total of 2,973. For the emerging plan period (2006 to 2026) there has been an average of 190 net additional dwellings completed, which is a total of 570 dwellings. There have been **159** actual completions for this reporting year.

H2 (c): Net additional dwellings in future years

Target at 4,000 (2006-2021)

	09/10 Cur	10/11 1	11/12 2	12/13 3	13/14 4	14/15 5	15/16	16/17	17/18	18/19	19/20	20/21
Net Additions	109	108	108	108	375	375	375	375	375	374	374	374
Hectares		3.6	3.6	3.6	12.5	12.5						
Target		267	267	267	267	267	267	267	267	267	267	267

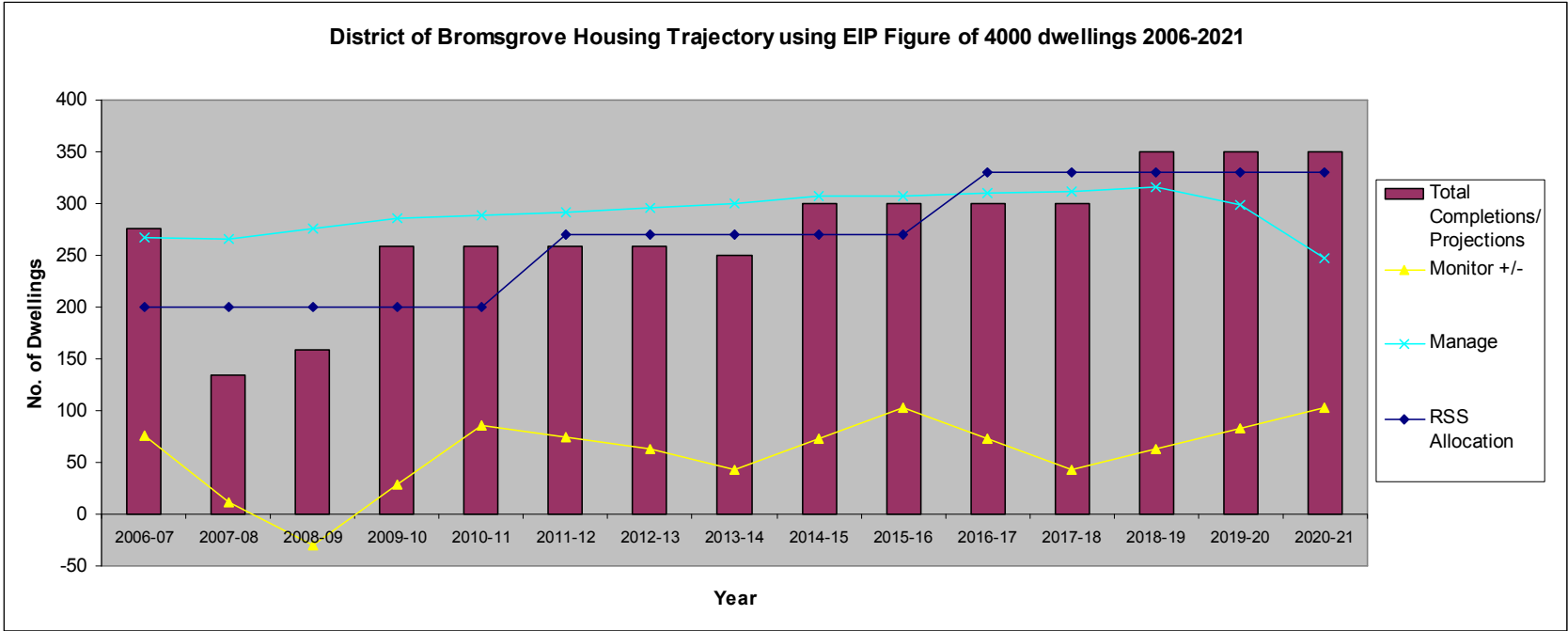
Target at 4,000 (2006-2026)

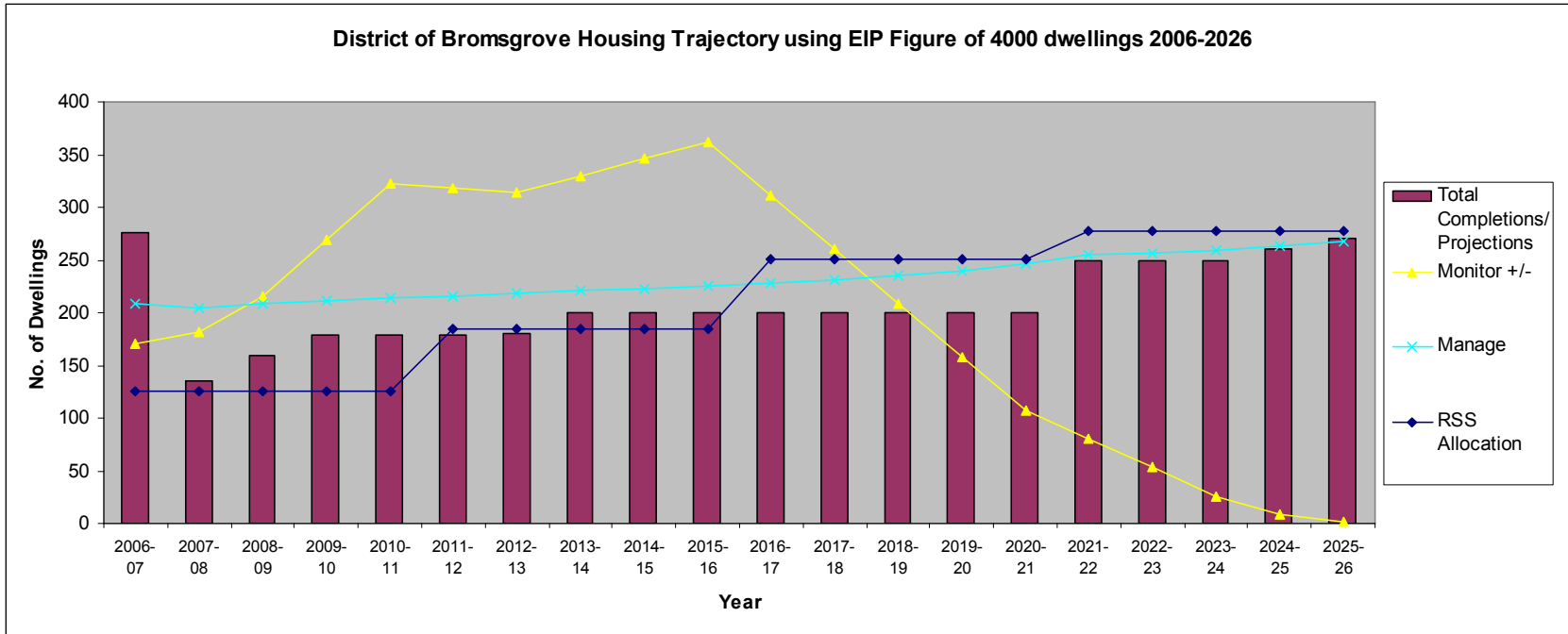
	09/10 Cur	10/11 1	11/12 2	12/13 3	13/14 4	14/15 5	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26
Net Additions	109	108	108	108	231	231	231	231	231	231	231	230	230	230	230	230	230
Hectares		3.6	3.6	3.6	7.7	7.7											
Target		200	200	200	200	200	200	200	200	200	200	200	200	200	200	200	200

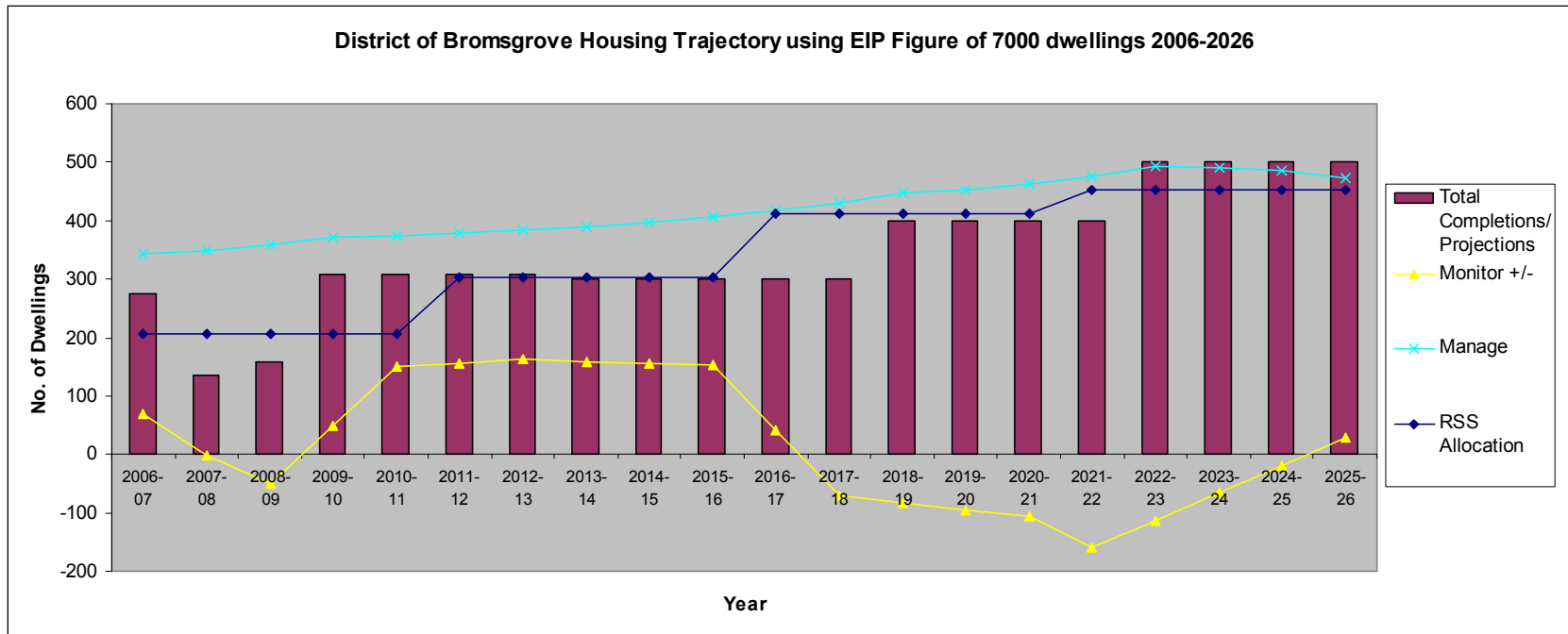
Target at 7,000 (2006-2026)

	09/10 Cur	10/11 1	11/12 2	12/13 3	13/14 4	14/15 5	15/16	16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26
Net Additions	109	108	108	108	462	462	462	462	461	461	461	461	461	461	461	461	461
Hectares		3.6	3.6	3.6	15.4	15.4											
Target		350	350	350	350	350	350	350	350	350	350	350	350	350	350	350	350

H2 (d): Managed delivery target (Housing Trajectory)







L5: Percentage of new dwellings completed at:

- (a) less than 30 dwellings per hectare
- (b) between 30 and 50 dwellings per hectare
- (c) above 50 dwellings per hectare

Guidance within PPS3 recommends that all housing should be at a minimum density of 30 dwellings per hectare. The Council has significantly improved on last year's high figure of 38.4% of dwellings built at less than 30 dwellings per hectare, with a relatively low figure of 20.8%. It is difficult to achieve 100% of housing at the minimum density due to the large quantity of smaller sites, especially when one dwelling is replaced by another single dwelling. The high figure of 74.4% of housing to achieve more than 50 dwellings per hectare can be accounted for by a number of larger sites, in particular affordable housing projects such as on School Drive, consisting of 51 flats/apartments.

Density of New Housing Development

Density of Site	No. of Dwellings	Percentage (%)
<30 dwellings per hectare	35	20.8%
30-50 dwellings per hectare	8	4.8%
>50 dwellings per hectare	125	74.4%
Total	168	100

H3: New and converted dwellings on previously developed land

Policy CF4 of the Regional Spatial Strategy supports the reuse of land and buildings, encouraging Local Planning Authorities to optimise the opportunities for recycling land and buildings for new housing development through contributing to the achievement of a Regional target of at least 76% of future housing provision being on previously developed land between 2001-2011. The 2011 target for Worcestershire of new housing on Previously Developed Land (Brownfield) is 68%.

The proportion of new and converted dwellings completed on previously developed land during the 2008/09 AMR period was **95.23%**. This consisted of 34.52% on residential land, 52.38% on employment land, 2.38% on retail land, and 5.95% on other brownfield land. Bromsgrove has successfully achieved high figures, easily meeting both the Regional target of 76% and Worcestershire target of 68%. The high percentage was also higher than the last three years achievement of 92% (2005/06), 87% (2006/07) and 84.87% (2007/08).

H4: Net additional pitches (Gypsy and Traveller)

There were no new gypsy and traveller pitches provided this monitoring year. The Gypsy and Travellers Accommodation Assessment (2008) has identified that no additional pitches are required in Bromsgrove in the five year period between 2008 and 2013. The Council is currently working towards the publication of the Core Strategy next autumn. If circumstances change or a greater demand is identified after 2013, it is anticipated that the Core Strategy will include a set of criteria for permanent gypsy and traveller sites and possibly broad locations for such development.

H5: Gross affordable housing completions

Affordable Housing Completions (Gross) 2008/09						
Application	Site	Parish	Area (ha)	Social Rented Dwellings	Intermediate Dwellings	Total Dwellings
2007/0466	School Drive	Bromsgrove	0.72	22	29	51
2007/0214	7a & 9a Old Birmingham Rd	Bromsgrove	0.06	5	0	5
2007/0837	102 Broad Street	Bromsgrove	0.12	4	0	4
2007/0004	Acorn Road	Catshill	0.4	14	12	26
2006/0703	85-87 Leach Heath Lane	Rubery	0.14	6*	0	6
2007/0835	166-168 New Road	Rubery	0.09	6	0	6
Total			1.53	57	41	98

*These figures do not match the gross completion figures for 2008/09 because some were completed in the previous collection year but were not included within those affordable housing figures.

The number of affordable housing completions has increased significantly on the total achieved in last years Annual Monitoring Report (98 compared with 31 dwellings). This figure is considerably higher than the Bromsgrove District Council's target of 80 per annum, which was proposed as part of the Council Plan in 2008.

The increased housing allocation of 4,000 dwellings proposed as part of the Panel Report for the emerging Regional Spatial Strategy (Phase Two Revision) will enable a greater amount of affordable housing to be completed over the plan period. The realisation is that every year that the Council fails to meet the required level of supply, the demand for affordable housing increases, and this issue is being addressed in the Draft Core Strategy.

H6: Housing Quality – building for life assessments

Bromsgrove District Council does not currently assess new developments according to the 'Building for Life' criteria.

Relevant local Plan Policies

Policy S4: The District Council will monitor the release of sites for housing purposes to enable the maintenance of a 5 year supply of housing land and to ensure that there is a relatively even supply of land for any given period of time.

Policy S14: The District Council, in partnership with other agencies, will endeavour to increase the range of housing types available in the District. Proposals leading to the provision of affordable housing will be welcomed where these provide housing for rent, sale or for shared ownership. The majority of units will be provided in existing urban areas whilst the provision of affordable housing to meet local needs may also be forthcoming in appropriate rural settlements.

Comments: In relation to Policy S4, the Council has constantly monitored housing development in recent years and due to the Council exceeding housing targets a housing moratorium was enforced in July 2003. The new allocation figures stated as part of the RSS revision now means Bromsgrove District Council no longer is in a position of oversupply and does not currently have a five year land supply which is required as part of PPS 3.

In recent years, the Council has carried out a carried out a Housing Needs Assessment, and a Strategic Housing market Assessment. These have identified that house prices have continued to rise, resulting in an ever increasing demand for affordable housing. A target of 80 affordable units has been set but has only been achieved this year. In the past, the moratorium further restricted the delivery of affordable homes, as there is an increased reliance on 100% affordable housing sites. Although Policy S14, along with S15 and S16 promote a mixture of housing types, particularly affordable housing, it has become increasingly difficult to implement with previous RSS allocation, but should be more achievable with the new figures. Policy S18 is concerned with the provision of land for gypsies, and in line with the Core Output Indicators, the net additional pitches for gypsies and travellers should be monitored each year.

Chapter Seven: Transport and Local Services

Responsibility for the transport network falls on three agencies: The Highways Agency, Worcestershire County Council, and Bromsgrove District Council. Bromsgrove District Council is responsible for the provision of public car parks and for ensuring that planning proposals are compatible with transport policy. The Highways Agency is responsible for the M5 and M42 motorways and those lengths of the A38, A435 and A456, which are trunk roads. Worcestershire County Council as Highway Authority is responsible for public transport, and other highways and traffic management and the maintenance of public footpaths.

Car Ownership

Transport (all households)	Value	Eng & Wales Rank/376 (proportion)	Regional Rank/34 (proportion)
Households without car/van	4,686	355	34
Households with 1 car or van	13,971	341	33
Households with 2 or more cars/vans	16,511	21	2

Source: Office for National Statistics (Revised February 2003)

Travel to Work

Travel to work (all people aged 16-74 in employment)	Value	Eng & Wales Rank/376 (proportion)	Regional Rank/34 (proportion)
Travel to work by car	32,232	15	4
Travel to work by public transport	2,496	250	15

Source: Office for National Statistics (Revised February 2003)

L6: Percentage of completed non-residential development complying with car parking standards set out in the Local Development Framework

All non-residential development during this AMR period has complied with car parking standards set out in the Local Development Framework. The **100%** consisted of a total of **16,787.26m²** additional floorspace for B1, B2 and B8 uses.

L7: Percentage of new resident development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and a major health centre

*** AWAITING FIGURES FROM COUNTY ***

L8: Amount of completed retail, office and leisure development respectively

Application	Description	Use	Site Area (m²)
B/2005/1167	Land at Westonhall Road, Stoke Prior	Office (B1)	2567.26
B/2006/0236	Little Whitegates, Tutnall Lane, Tutnall	Office (B1)	49.22
B/2006/1142	St. Mary's Church, Chapel Lane, Wythall	Office (B1)	174.72
	Total:		2,791.2

Throughout this AMR period, there has been no completed retail or leisure development in Bromsgrove District. However, there was a total of **2,791.2m² (0.28ha)** of land that could be used for office (B1) use.

L9: Amount of completed retail, office and leisure development respectively in town centres

As in conjunction with Core Output Indicator BD4, there were no completed developments or additional floorspace within the Town Centre Zone that was identified in the Bromsgrove District Council Local Plan for this AMR period. The major redevelopments proposed for the town centre means that any piecemeal development at this time could compromise ability to deliver a cohesive and comprehensive redevelopment.

L10: Amount of eligible open spaces managed to green flag award standard

A total of 55 awards were granted to Local Authorities across the West Midlands region throughout 2009. Bromsgrove District Council has been awarded a 'Green Flag Award' for Sanders Park near the town centre. Site improvements and a management plan have helped to ensure Sanders Park achieved its 'Green Flag Award' consecutively from 2006 to 2009.

Relevant Local Plan Policies

Policy DS13: The District will take full account of the need for future development to be sustainable so that present demands do not compromise the ability of future generations to meet their own demands or enjoy a high quality environment. All development must reflect the need to safeguard and improve the quality of life for residents.

Policy TR10: The District Council will require a percentage or minimum number of car-parking spaces in public car parks of wider dimensions for the benefit of disabled motorists.

Policy TR15: The District Council will seek to encourage more use of rail services by enhancing car parking at railway stations. Potential sites are allocated at Barnt

Green (BG2) and Bromsgrove (BROM31). Planning permission will not be granted for development which would prejudice the use of at least part of these sites for that purpose.

Comments: Sustainable Development is a topic high on the national agenda, and Policy DS13 sees its implementation at a local level. The majority of new residential and commercial development has occurred within the town of Bromsgrove. This is the most sustainable location within the District that provides the best opportunity for people to use public transport with many bus routes and a train station with excellent links across the West Midlands. A continued effort needs to be made to divert development away from unsustainable locations as recommended within the RSS. Policy TR10 is concerned to some extent Local Indicator L6 regarding car-parking spaces. Provision is required on larger commercial and public developments for a number of disabled spaces to be provided. Provision is implemented through the development and building control systems and seeks to provide spaces appropriate to the type of usage generated by the land use. Policy TR15 is also related to sustainable development, as the Council works in conjunction with rail operators and the County Council have provided additional parking facilities at Bromsgrove station. Further improvements are being sought and could come from developments of adjacent brownfield land. The potential for improvements at Barnt Green Station also exist although land ownership issues remain outstanding.

Policy S20: Bromsgrove will remain the main location for general shopping facilities relative to other locations within the District. The District Council will seek to strengthen Bromsgrove's shopping role in order to compete more successfully with other shopping centres in the surrounding area.

Comments: Bromsgrove Town centre is the primary shopping location in the District. Although it is in competition with larger centres in adjacent areas, the District Council has identified the Town Centre as a key location for improvement in future years and is currently preparing a Bromsgrove Town Centre Area Action Plan.

Chapter Eight: Environmental Quality

E1: Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds

There were no planning applications granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality for the AMR period 2008/09.

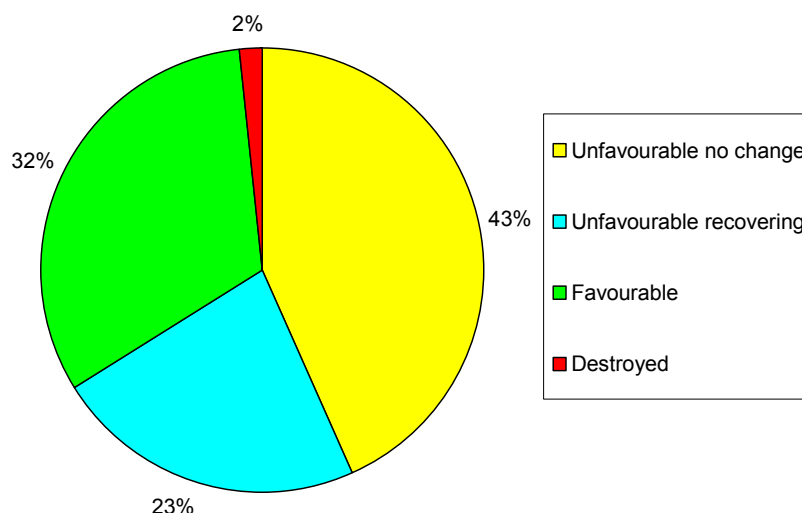
E2: Change in areas of biodiversity importance, including: (a) Change in priority habitats and species (by type) (b) Change in areas designated for their intrinsic environmental value including sites of international, national, regional or sub-regional significance.

There have been no new sites of international or national significance designated during this monitoring year or any additions to the list of Sites of Specific Scientific Interest (SSSI) within Bromsgrove District.

Figure 3: Condition of SSSI Units in Bromsgrove			
Name of Site	Main Habitat	Size (HA)	Condition Assessment
Bittell Reservoirs	Neutral Grassland - lowland	65.76	Unfavourable no change
Berry Mound Pastures	Standing open water and canals	11.81	Unfavourable recovering
Burcot Lane Cutting	Earth heritage	0.38	Favourable
Hewell Park Lake	Standing open water and canals	21.07	Favourable
Hopwood Dingle	Broadleaved, mixed and yew woodland - lowland	7.14	Favourable
Hurst Farm Pastures	Neutral Grassland - lowland	2.17	Favourable
Little Royal Farm Pastures	Neutral Grassland - lowland	3.29	Favourable
Madeley Heath Pit	Earth heritage	2.74	Destroyed
Oakland Pasture	Neutral Grassland - lowland	1.05	Unfavourable recovering
Penorchard & Spring Farm Pastures	Neutral Grassland - lowland	15.44	Favourable
Romsley Hill	Neutral Grassland - lowland	13.64	Unfavourable recovering
Romsley Manor Farm	Neutral Grassland - lowland	9.07	Unfavourable recovering
Sling Gravel Pits	Earth heritage	1.05	Unfavourable no change

Source: Natural England - Condition of SSSI units (2009)

Condition of SSSI's in Bromsgrove District



The table and pie chart above illustrates the condition report of the SSSI's within Bromsgrove District as of 1st October 2009. There has been one change since the last monitoring period - Sling Gravel Pits has progressed from 'unfavourable declining' to 'unfavourable no change'. A number of other sites are due to be resurveyed over the next year. The statistics indicate that only 55% of SSSI's by area were found to be in a 'favourable' or 'unfavourable but recovering' condition. The government has set a target of 95% of SSSI's by land area to be in a favourable condition by 2010.

As part of the 2007 AMR, the Council began monitoring applications that may have a 'significant' impact on biodiversity to assess whether comments from the Worcestershire Wildlife Trust (WWT) are affecting planning decisions and whether recommended conditions are attached to any approvals. There were a total of 18 applications that were considered to have 'significant' impacts on biodiversity at the time of submission of this AMR. The impact of comments from the Worcestershire Wildlife Trust are summarised below:

Applications Approved with biodiversity conditions

App. No.	Site Address	Proposal	Biodiversity Conditions
2007/1291	Redgrove School Site, Shaw Lane, Stoke Prior	19 affordable residential units with associated parking and new access arrangements	1. Ecological Method Statement before development including a full bat survey with possible mitigation measures
2008/0748	Moundsley Hall Nursing Home, Kings Norton	Extension to existing care home to provide additional accommodation	1. Great Crested Newts survey and mitigation measures 2. Vegetation clearance work undertaken outside of bird nesting

			season
2008/0333	Longbridge East and Part River Arrow, Cofton Hackett	Site re-modelling, re- profiling and alterations to River Arrow and culverts	1. Mitigation measures in accordance with para. 4.71 -4.73 contained within the document Longbridge East River Arrow Enhancement and Site Remediation
2008/0833	Brookhouse Farm, Frankley Green, Frankley	Upgrade of existing infrastructure within wash out chambers along Severn Aqueduct, reinforcement of banks and 2 pedestrian footbridges across streams	1. Detailed schedule of works required before development, so Local Authority can confirm whether works would be carried out in an environmentally sensitive manor
2008/0685	Stourbridge Road, Bromsgrove	New Primary Care Centre with retail pharmacy, opticians, children's nursery and 'life trail' with associated parking	1. Bat mitigation and enhancement 2. Demolition to take place Sept. to March with ecologist present to ensure safety of protected species
2008/0758	Perryfields Road, Bromsgrove	Residential development of 100% affordable housing	1. Recommendations in the Middlemarch Environment badger, bat and reptile survey to be observed. If species found, work shall temporarily cease and mitigation measures implemented
2008/0810	Station House, 150 New Road, Bromsgrove	'Foyer' scheme to consist of 11 no. studios and 4 no. flats, communal living room, training kitchen, IT suite, laundry, staff office, interview room and staff sleepover flat with associated access and parking arrangements	1. Implementation of recommendations from the Evolution Ecology BREEAM Assessment
2008/1084	Beasleys Farm, Upper Gambolds Lane, Stoke Pound	Alterations and extensions to existing dwelling house	1. Bat mitigation and compensation measures
2009/0136	Wythall Green Business Park, Middle Lane, Wythall	Outline approval for business park with associated service roads, landscaping and parking	1. Mitigation measures and survey work as set out in Ecological Appraisal. 2. Integrated wildlife management plan to be submitted to Local Authority

There were only a relatively small number of applications (18) that were considered to have a significant impact on biodiversity during this AMR period. There were no applications refused on a biodiversity basis, although four relevant applications were refused on Green Belt grounds. There were also no applications approved without biodiversity conditions and another four were withdrawn. There is one application that is still ongoing and a decision has not yet been reached. The remaining nine applications that the Worcestershire Wildlife Trust considered to have biodiversity implications contained conditions to minimise any potential adverse effects.

E3: Renewable energy generation

There was no renewable energy capacity provided in the District in 2008 to 2009. The guidance within PPS22 and policies to be contained in the emerging Core Strategy should help to encourage proposals for new capacity in the future. It will be important for future policies to require new development to incorporate measures to generate a proportion of their energy needs from renewable sources, which would ensure the delivery of some capacity and help to cut carbon emissions, a major cause of global warming.

Relevant Local Plan Policy

Policy ES1: The District Council recognises the importance of the natural watercourse system for providing essential drainage of land and will protect that function against adverse forms of development, specifically to prevent:

- (a) the loss of access to watercourses for future maintenance;**
- (b) the loss of natural flood plain, except where fully effective compensatory measures are provided as agreed with the Local Planning Authority;**
- (c) drainage from development giving rise to substantial changes in the characteristics of surface water run-off unless adequate off site works can be provided;**
- (d) the District Council will ensure that no development involving the storage of oils and chemicals shall take place unless adequate measures have been taken to prevent discharge to watercourses in the event of spillages and/or leaks.**

Policy ES2: Proposals involving new development i.e. structures, alteration of ground levels or the erection of temporary buildings will not normally be permitted where there is a known risk of flooding, or where the Environment Agency indicate there are potential problems. Where balancing is necessary the developer must demonstrate that adequate provision for future maintenance of the balancing device has been made. This may be accomplished by an appropriate Section 106 planning obligation.

Policy ES4: The District Council will not allow development proposals which either individually or in combination with other similar developments, would result in pollution or derogation of groundwater.

Comments: These Local Plan policies are all relevant to Core Output Indicator E1. Policy ES1 requires consultation with the Environment Agency where development is proposed adjoining or draining directly or indirectly to any watercourse. This acts as a prohibitive measure to development on flood plains, as well as restricting potential increases in run-off from new developments. Policy ES2 has enabled the District to refuse applications where there has been a serious flood risk, and also requires close consultation with the Environment Agency. Policy ES4 is more concerned with water

quality, and can be used by the Council to minimise the effect development has on water resources.

Policy C9: Development proposals which would destroy or adversely affect, directly or indirectly, a designated or proposed Site of Special Scientific Interest or National Nature Reserve will not be permitted. In the event of a designated or proposed site of international importance being identified within the District it will be subject to the extra protection and special procedures appropriate to the designation.

Policy C10: Development proposals which would destroy or adversely affect, directly or indirectly, a Special Wildlife Site, Local Nature Reserve or sites subject to an Agreement under Section 39 of the Wildlife and Countryside Act 1981, will only be permitted where it can be demonstrated that the net adverse impact of the proposal is not significant, having regard to the value of the nature conservation features which were the reason for the designation of the site.

Policy C10A: The District Council will seek to minimise the effects of development proposals on features of nature conservation importance in the District. This will include woodlands, ponds, lakes or streams, marshland and wetlands and unimproved grasslands.

Policy C11: In considering any development or management proposal, due regard will be paid to the specific requirements of statutorily protected fauna and flora. English Nature will be consulted if any proposal may result in damage to any area where species listed under Schedules 5 and 8 of the Wildlife and Countryside Act 1981 occurs.

Comments: All these policies within the Local Plan have regard for the protection of the environment. These policies allow the Council to restrict developments that have a negative effect on the District's biodiversity. There are a number of sites throughout the District that contain a significant amount of varied flora and fauna, and these policies help prevent undue harm and aide in controlling development near such sites. However, the Biodiversity Action Plan is currently under revision and progression with this will provide a clearer picture of the biodiversity within the District.

Policy ES15: Proposals for exploiting sources of renewable energy will be carefully considered by the District Council for their impact on the landscape, wildlife and other relevant factors. Where the impact of the technology being proposed is considered compatible with both the immediate and wider community interests then schemes may prove acceptable.

Comments: PPS22 has been introduced since the adoption of the Local Plan, providing greater emphasis on using renewable energy, which is not reflected in this policy. As no energy capacity has been provided over the last AMR period it will be important to consider how new developments might be able to incorporate measures to generate a proportion of their energy needs from renewable sources. Future policies developed through the LDF, and particularly the Core Strategy, will focus more on promoting and encouraging the use of renewable energy.

BROMSGROVE DISTRICT COUNCIL

Local Development Framework Working Party

16th December 2009

Affordable Housing SPD

Responsible Portfolio Holder	Councillor Mrs J Dyer
Responsible Head of Service	Dave Hammond, Head of Planning & Environment Services
Non-Key Decision	

1. SUMMARY

- 1.1 The purpose of this report is to present members with an amended draft of Affordable Housing Supplementary Planning Document (SPD) which is currently being consulted on.

2. RECOMMENDATION

- 2.1 Members note that an 8 week formal consultation has now begun on the Draft Affordable Housing SPD.

3. BACKGROUND

- 3.1 An earlier draft version of the Affordable Housing SPD was presented to Members of the LDF Working Party on 15th October 2009. Following feedback from the Working Party the draft was amended and authorised for consultation by the Head of Planning and Environment Services in consultation with the responsible portfolio holder. An 8 week period of consultation began on November 30th and will end on January 30th 2010.
- 3.2 The document as a whole has not changed significantly and retains a focus on increasing the levels of affordable housing across the district with the majority of changes merely improving grammar and spelling. Where a change has been more substantial it has been outlined within this report.
- 3.3 The document has been updated to reflect the outcomes in Panel's Report into the Phase 2 Revision of the Regional Spatial Strategy (RSS). These changes relate primarily to the recommendation that the Council delivers 4,000 homes by 2026 and the changes proposed to Policy CF7: 'Affordable Housing' of the RSS.
- 3.4 Chapter 2: 'Planning Policy Context' has been expanded to show greater links with the Sustainable Community Strategy. The document now emphasises that the Affordable Housing SPD will help to achieve some of the issues raised with the Sustainable Community Strategy.

- 3.5 The main changes to the document are in Chapter 5: Delivering Affordable Housing. To maximise the amount of affordable housing that can be delivered the threshold has been reduced. The Council will now seek contributions to affordable housing on all housing developments where there is a net increase in the number of dwellings. It is recognised that on sites of less than 5 dwellings or under 0.2ha it will not generally be possible to deliver affordable housing on site. The Council will therefore expect a financial contribution towards affordable housing on these small schemes. The document does not set out a method for how this figure will be calculated allowing negotiation to take on each scheme to ensure that developments remain viable.
- 3.6 Chapter 5 now contains a section on the choice of Registered Social Landlord (RSL). This sets out the Council's expectation that all applicants will need to enter into an agreement with an RSL who will manage the affordable properties on completion. The text encourages applicants to work with one of the Council's Preferred Partners that are set out within appendix B of the SPD.
- 3.7 The layout of Chapter 5 has been amended with all key information now in policy boxes. This should make it clear to the reader what the key issues are in terms of affordable housing delivery. The general thrust of the document has not changed but in places the amount of text has been reduced to create a clearer and more focussed document.
- 3.8 Some changes have been made to Chapter 6: 'Rural Exception Site Policies' in relation to suitable locations for Rural Exception Sites. The policy now lists the settlements where the Rural Exceptions Policy will apply. Whilst the list of sites shown in the document is not exhaustive it provides clear guidance as to the kinds of locations where such affordable housing schemes may be appropriate.
- 3.9 In addition to the actual SPD, two further documents have also been produced. These are the Sustainability Appraisal and the Consultation Statement. The Sustainability Appraisal tests the SPD against the Council's sustainability objectives identifying where the document will have a positive or negative impact. The Consultation Statement summarises the consultation events that have taken place over the past 4 years that have helped to inform the SPD. Both of these documents and the SPD have been attached as appendices to this report.
- 3.10 After the end of the consultation period all written representations will be summarised with a response from the Council. Where appropriate the document will be amended and an adoption version will be brought before Members in Spring 2010.

4. FINANCIAL IMPLICATIONS

- 4.1 The SPD is being produced by the Strategic Planning team and therefore there are no external costs associated with the production of this document.

5. LEGAL IMPLICATIONS

- 5.1 The Affordable Housing SPD is being produced in accordance with the provisions set out in the Planning and Compulsory Purchase Act 2004, and prepared in accordance with The Town and Country Planning (Local Development) (England) Regulations 2004.

6. COUNCIL OBJECTIVES

6.1 Objective 1 Regeneration - Priority Housing

The adoption of the Affordable Housing SPD would increase the provision of affordable housing in the district in line with Council's objectives.

7. RISK MANAGEMENT INCLUDING HEALTH & SAFETY CONSIDERATIONS

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

- Without a detailed policy on affordable housing the council would risk not meeting its corporate objective of providing more affordable housing across the district.

- 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 Consultation to be carried out in line with legislation and adopted standards contained in the Bromsgrove District Council Statement of Community Involvement (SCI).

9. EQUALITIES AND DIVERSITY IMPLICATIONS

- 9.1 None

10. VALUE FOR MONEY IMPLICATIONS

- 10.1 None

11. CLIMATE CHANGE AND CARBON IMPLICATIONS

- 11.1 A Sustainability Appraisal has been completed on the SPD to measure the extent to which the Affordable Housing SPD is likely to have a positive or negative impact on sustainability and the extent to which it therefore works towards or against the achievement of sustainable development.
- 11.2 The SPD performs well against the social objectives of providing housing to meet local needs and reducing poverty and social exclusion. However the document performs less well against the objectives of reducing noise and preserving and enhancing biodiversity. The Sustainability Appraisal identifies how these risks can be managed ensuring that the document has a positive impact on the district.
- 11.3 Affordable housing must achieve level 3 of the Code for Sustainable Homes meaning that any new housing will be energy efficient and reduce the impacts of climate change. Over the upcoming years affordable housing will need to be built to increasingly high standards with the Government proposing that all new homes should be 'zero carbon' by 2016.

12. OTHER IMPLICATIONS

Procurement Issues	None
Personnel	None
Governance/Performance Management	None
Community Safety including Section 17 of Crime and Disorder Act 1998	None
Policy	Affordable Housing SPD sets clear planning policy in respect of the provision of affordable housing
Biodiversity	None

13. OTHERS CONSULTED ON THE REPORT

Portfolio Holder	Yes - informal briefing
Joint Chief Executive	No
Executive Director - Partnerships and Projects	No
Executive Director - Services	No
Assistant Chief Executive	No

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

14. WARDS AFFECTED

All Wards

15. APPENDICES

Appendix 1 Affordable Housing SPD

16. BACKGROUND PAPERS

Sustainability Appraisal
Consultation Statement

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Draft

Affordable Housing Supplementary Planning Document



NOVEMBER 2009



Planning and
Environment Services

Bromsgrove District Council

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1. Introduction

1.1 The Government believes that everyone should have the opportunity of a decent home which they can afford in a community in which they want to live and work. In Bromsgrove District there is an identified need for significant levels of affordable housing. The Council therefore intends to progress the Affordable Housing SPD to give clear guidance for the provision of new affordable housing development. Once adopted it will form part of the Local Development Framework (LDF) for Bromsgrove District Council. The guidance contained in this document is intended to supplement Core Policy 16: Affordable Housing contained within the emerging Core Strategy and build upon guidance contained within policies S15 and S18 of the Bromsgrove District Local Plan.

1.2 A significant amount of pre-consultation work has taken place over the past 4 years that has helped to inform the evolution of this document. This includes workshops, presentations and consultation on the Council's emerging Draft Core Strategy. Information has been gathered from a range of consultees and built into this draft SPD. Full details of previous consultation exercises can be found within the separate Consultation Statement.

1.3 This draft version of the SPD is now available for public consultation. The Council is seeking the views of all interested parties on this draft document and the associated Sustainability Appraisal over an 8 week period beginning on 30th November 2009. The closing date for comments is 30th January 2010. Any comment made will be considered and where appropriate incorporated into the document before the SPD is finalised. We hope to adopt the SPD by spring 2010.

Please send any comments to:

**Strategic Planning Department
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
B601AA**

LDF@bromsgrove.gov.uk

2. Planning Policy Context

2.1 The Planning and Compulsory Purchase Act 2004 requires that all documents within the planning system sit within a recognised chain of conformity; consequently this document conforms with all other relevant policies and plans. The most relevant plans and policies are currently PPS1 Delivering Sustainable Development, PPS3 Housing, the West Midlands Regional Spatial Strategy and the emerging Core Strategy for Bromsgrove.

PPS1 Delivering Sustainable Development (2005)

2.2 This is a key policy document that outlines the Government's vision of strong vibrant and sustainable communities in both urban and rural areas. A key element in achieving this vision is the promotion of development that creates socially inclusive communities, with a suitable mix of houses which would include an element of affordable where a local need is identified.

PPS3 Housing (2006)

2.3 PPS3 sets the national planning policies for the provision of new housing and The Government's key housing policy goal is to "ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live."

In line with PPS3 the specific outcomes that the planning system should deliver are:

- High quality housing that is well-designed and built to a high standard.
- A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural.
- A sufficient quantity of housing taking into account need and demand and seeking to improve choice.
- Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure.
- A flexible, responsive supply of land - managed in a way that makes efficient and effective use of land, including re-use of previously-developed land, where appropriate.

2.4 Other important guidance contained within PPS3 is that concerning rural exception housing. Rural exception policies allow permission to be granted on rural sites, which under other planning controls would not be allowed. Where there is an identified local need for affordable housing permission can be granted provided the scheme is 100% affordable, is of a moderate size and the type and tenure is compatible with the local housing needs identified. Should the Council need to produce a Land Allocations DPD, this could allocate sites to meet affordable housing needs in rural communities provided that adequate evidence of such need exists and that suitable sites are available.

2.5 PPS3 reduces the minimum threshold for affordable housing down to 15 dwellings from a figure of 24 that was in the now cancelled Circular 6/98. This means that any site where 15 or more dwellings are proposed a provision of affordable housing will be required. However, Local Planning Authorities can set lower thresholds, where viable and practicable, including in rural areas.

The West Midlands Regional Spatial Strategy

2.6 The Regional Spatial Strategy for the West Midlands is currently under review. An Examination in Public was held in Spring 2009 and the Panel's Report was published in September. The Panel made a number of recommendations in relation to policy CF7: 'Delivering Affordable Housing'. The Panel concluded that 'the regional affordable housing target should be 35% of the total, equating to 7,000 dwellings per annum over 20 years'. Of this 7000, an indicative minimum target of 1200 affordable units per annum has been apportioned to the South Housing Market Area. The policy goes into further detail and states that local authorities should set an overall minimum affordable housing target. Only exceptionally should the proportion of affordable housing be either below 25% or above 40% of the total additional housing provision. The policy emphasises the importance of rural exceptions in delivering 100% affordable housing schemes that meet the needs of the local community.

2.7 The level of housing allocated to Bromsgrove District through the emerging RSS will greatly influence the amount of affordable housing that can be provided. The Panel's report recommends a net figure of 4000 units between 2006 and 2026, however this may change depending on the Proposed Changes by the Secretary of State. This housing target is based on delivering housing that meets identified local needs. A district level Housing Market Assessment commissioned by the Council identified a high level of local generated need for 2 and 3 bedroom properties, affordable housing and accommodation that is suitable for the increasing pensioner population. The Council's approach was endorsed by the Panel who stated:

'such careful targeting is encouraged within PPS3' and 'as a consequence., we consider that the approach should be applauded and used more widely to address the issue of seeking to meet local needs.' (WMRSS Phase 2 Revision: Panel Report, P.195)

2.8 The Council therefore intends to continue with its approach of carefully targeting housing to those in need. This SPD will be the first step in achieving this goal with the Core Strategy following soon after.

2.9 Policy CF2 of the RSS indicates new housing should be accommodated within and adjacent to market towns which need to be capable of creating balanced communities for housing and employment. In villages any development should support the need to meet local housing requirements, particularly the need for affordable housing. The policy emphasises the importance of prioritising development in villages which have a range of services.

Bromsgrove District Local Plan

2.10 The Local Plan is the adopted development plan for the District of Bromsgrove. Following the issue of a direction from the Secretary of State, dated 7th September 2007, most policies have been saved, and remain in operation beyond September 2007 until they are replaced by policies in new Development Plan Documents. Policy S15 'Affordable Housing in Urban Areas' and Policy S16 'Affordable Housing in the Green Belt' have both been saved. These policies set a basic framework for the delivery of affordable housing in the district. The SPD will build upon this providing a much greater level of detail. The SPD will be linked to these adopted Local Plan policies and the emerging Core Strategy until the Core Strategy reaches the adoption stage and supersedes Policies S15 and S16 of the Local Plan.

Bromsgrove's Core Strategy

2.11 Once adopted the Core Strategy will sit within the Local Development Framework and will be a material consideration for all planning applications within the district. The Core Strategy has several key components. These include a spatial vision that sets out an aspirational target of what the district will be like in 2026 and a series of objectives that are required to deliver the vision. Most relevant are the core policies that are required to ensure that the strategic objectives are achieved. One of the core policies relates directly to this SPD and that is CP16: Affordable Housing. This policy outlines a framework for the delivery of affordable housing across the district. The purpose of this SPD will be to expand on the core strategy policy and provide greater detail and clarity for the private sector as to what is required on development sites.

2.12 Due to the great level of need for affordable housing across the District (this is explained in greater detail in Chapter 4) the SPD will be linked to the emerging Core Strategy. This will ensure that affordable housing delivery is maximised in the time prior to the adoption of the Core Strategy. In compliance with European Union Directive 2001/42/EC this SPD is accompanied by a Sustainability Appraisal to assess the possible impacts of the SPD against sustainability objectives.

Sustainable Community Strategy 2010-2013

2.13 Corporately the Council has identified 4 areas which are considered to be a top priority. One of these is housing, and in particular the need for affordable housing. These priorities were drawn up following feedback from consultations with the general public, Bromsgrove District Council staff and Council Members. A joined up approach is required to address the issue of housing need and therefore the Sustainable Community Strategy has a crucial role to play in this process. The Sustainable Community Strategy has the following overarching aim:

“We will make Bromsgrove a better place to live, work and visit by driving forward change”

2.14 This strategy is being driven forward by Local Strategic Partnership (LSP). This brings together local partners in order to develop a shared understanding of the particular needs and priorities of Bromsgrove. The LSP in Bromsgrove District is known as the Bromsgrove Partnership. There are six key themes identified in the Sustainable Community Strategy which have helped to inform the spatial objectives in the Draft Core Strategy. These objectives will be achieved through the implementation of policies in the Core Strategy.

2.15 One of the themes identified within the Sustainable Community Strategy is ‘Stronger Communities’. Within this theme one of the priorities is to deliver affordable housing to meet the needs of the District. The strategy also focuses on the need to create balanced communities with the provision of housing that is appropriate for the elderly and young adults. Whilst the Draft Core Strategy contains a policy on affordable housing, the need is so great that a policy needs to be in place before Core Strategy adoption to maximise delivery. The Affordable Housing SPD will address several issues raised within the Sustainable Community Strategy and will be the driving force behind the delivery of affordable housing in the district.

3. Defining Affordable Housing

3.1 There are many similar definitions of affordable housing. For this document the definition used is that contained within 'PPS3: Housing'.

- 'Affordable housing includes social rented and intermediate housing, provided to specified eligible households whose needs are not met by the market. Affordable housing should:
- Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.
- Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision'

3.2 This means that affordable housing is accommodation for sale or rent that is available at a price identified as being genuinely affordable to those people living, needing to live or work in the area that are unable to access housing on the open market.

3.3 The main types of units to be provided in Bromsgrove are:

Low cost Rented Housing - Housing rented by a Registered Social Landlord at a price below the cost of renting privately

Intermediate Housing - There are 3 types of intermediate housing that are summarised below:

- Shared Ownership Housing - Housing where a tenant buys a proportion of the property from a Registered Social Landlord, and rents the rest with the option to buy an increased share of the entire property.
- Intermediate Rent - Housing is rented at prices above the price of low cost rent but below prices of the private rental market. The rent should not exceed 80% of the price of full market renting.
- Intermediate Rent to Purchase - The property is rented at a price not exceeding 80% of the full market value for 5 years. After this period of time the tenant has the opportunity to purchase a share in the property.

Defining Affordability

3.4 The 2008 Housing Market Assessment compared patterns of household income against recent and current house prices as a way of identifying the level of affordability within the housing market. The study focused on the sale price of two and three bedroom properties. As with any analysis a number of assumptions had to be made and these are as follows:

- access level property values;
- the provision of a 10% deposit although any size of deposit or none at all, can be accommodated within the calculations;
- mortgage affordability based on a loan: income ratio of 3:5 for single income households and 2:9 for couple income households, and,
- monthly repayments based on a 25 year repayment mortgage at a rate of 7.0%. Only a very limited number of discounted deals are available, and these are unlikely to be offered to lower income first time buyers.

3.5 The figure 1 identifies the estimated proportions of single income households able to access two bed full cost re-sale and new build HomeBuy entry level properties. This table clearly shows that approximately half of single income households are unable to afford 2 bedroom properties that are for sale on the open market. Naturally the percentage of people able to access homebuy schemes would be significantly higher if they were available.

Figure 1

The estimated proportions of single income households able to access 2 bed properties, figures rounded

Property type	Entry level property price Less 10% deposit)	Income required (rounded)	Proportion able to purchase	Home Buy Income required (70%)	Proportion able to purchase
2 bed new-build property	£130k	£33.4k	50%	£23.4k	70%
2 bed re-sale property	£120k	£30.9k	53%	£21.6k	72%

3.6 Figure 2 focuses on the purchase price of 3 bedroom properties. The stark reality is that little more than one third of joint income households are able to purchase a 3 bedroom re-sale property at full market value.

Figure 2

The estimated proportions of joint income households able to access 3 bed properties, figures rounded

Property type	Entry level property price Less 10% deposit)	Income required (rounded)	Proportion able to purchase	Home Buy Income required (70%)	Proportion able to purchase
3 bed new-build property	£230k	£63.5k	14%	£44.4k	32%
3 bed re-sale property	£150k	£41.4k	36%	£29.0k	57%

3.7 Two and three bedroom properties need to be accessible to a wide range of the population. Properties of this size can cater for young couples, small families and elderly couples. It is vital that all of these groups are provided for to maintain balanced mixed communities across the District. Whilst this document cannot make general market housing more affordable it is hoped that the delivery of affordable housing can be maximised to provide greater choice for the people of Bromsgrove.

4. Affordable Housing Need

4.1 As outlined in PPS3 it is important for local planning authorities to base any policies for affordable housing on an identified need. A high level of need has been identified through a Sub Regional Housing Market Assessment in 2007 and most recently a Bromsgrove District Housing Market Assessment in 2008.

4.2 These studies have been 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 critical details to come out of each study are that there is a significant need for affordable housing across the district.

4.3 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.

4.4 The recent Housing Market Assessment also identified a significant need for affordable housing throughout the district, stating a minimum of 70 affordable units should be built each year based on a new supply of 105 units per annum. However, a recent update based on annual supply of 200 units per year increases the annual need for affordable housing to 101 dwellings.

4.5 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.

4.6 Affordable housing is allocated across Worcestershire in a fair and transparent way ensuring that applicants in greatest need are treated as a top priority. This system is called Home Choice Plus and has been developed by a number of Local Authorities and Registered Social Landlords, working in partnership. This new way of allocating social housing across the district is based upon a banding system. The banding system is graded in the following way:

→ **Priority**

Accepted as homeless through duty under part VII of the Housing Act 1996

→ **Gold Plus**

Applicant must have a local connection and fall into one of the following categories:

Homeless but where there is no statutory duty to re-house

Households living in properties subject to enforcement notices or repossession

Households with very high medical need

Need to move from supported accommodation

Tenants who wish to move to smaller accommodation

→ **Gold**

Applicant must have a local connection and fall into one of the following categories:

Homeless applicants, who have intentionally become homeless

Households that suffer from harassment or domestic abuse

Overcrowded households

Households with a child(ren) who live in an upstairs flat

→ **Silver Plus**

Applicants who have no local connection and fall into one of the following categories:

Homeless but where there is no statutory duty to re-house

Households living in properties subject to enforcement notices or repossession

Households with very high medical need

Need to move from supported accommodation

Tenants who wish to move to smaller accommodation

→ **Silver**

Applicants who have no local connection and fall into one of the following categories:

Homeless applicants, who have intentionally become homeless

Households that suffer from harassment or domestic abuse

Overcrowded households

Households with a child(ren) who live in an upstairs flat

→ **Bronze Plus**

All applicants who live, work or have a local connection to the district but are not in housing need

→ **Bronze**

All applicants who have no local connection and are not in any housing need

5. Delivering Affordable Housing

5.1 The delivery of affordable housing is the major element of this guidance. As outlined above there is an identified need for affordable housing within the District. Whilst it is imperative to address this shortfall in provision it is also necessary to take a balanced approach in order to achieve successful new developments.

Targets

5.2 The RSS Panel Report identifies the annual need for affordable housing of 7,000 dwellings per annum over a period of 20 years. Bromsgrove falls within the South Housing Market Area (HMA) and it is clear that outside of the Central HMA the area has the greatest need arising from demography, 'right to buy' and re-housing due to demolitions. Accordingly Policy CF7 states that a gross minimum of 1,180 units should be provided across the South HMA each year. This figure is not broken down to district level, however all local authorities are required to set affordable housing targets between 25% and 40%, unless there are exceptional circumstances. To maximise the level of affordable housing delivery out of the total allocation for Bromsgrove under Policy CF3 the Council will impose a 40% target.

Thresholds

5.3 To address the high level of need for affordable housing, every application where there is a net increase in the number of dwellings will be expected to contribute towards affordable housing. Dependent on the size/capacity of the site this will be either on-site or as a commuted sum.

Policy AH1 **The Provision of Affordable Housing**

All schemes that propose a net increase in housing units will be expected to contribute towards affordable housing provision in the district.

The Council will ensure that a minimum target of 40% affordable housing will be achieved onsite in all developments across the District that fall within the following threshold:

- **A net increase of 5 or more dwellings or all sites equal to or over 0.2 hectares.**

Please note that where the 40% calculation does not result in a whole number the figure will be rounded up or down to the nearest whole unit.

In exceptional circumstances where the applicant can fully demonstrate that 40% cannot be achieved the District Council may negotiate a different provision

On schemes that fall below the threshold of 5 units or 0.2 hectares a financial contribution will be required in line with Policy AH2.

Financial Contributions

5.4 On schemes of less than five dwellings there is likely to be less scope to provide affordable housing on site. A financial contribution will therefore be required to deliver affordable housing elsewhere in the District. Financial contributions received will be pooled in a specific affordable housing fund. This will be used by the Strategic Housing Team to fund the provision of new build affordable housing schemes in the District. The Council will not be able to hold financial contributions indefinitely and will expect to use them within ten years of receipt of the contribution unless a different time period has otherwise been agreed.

Policy AH2 Financial Contributions

For every application that results in a net increase in dwellings a contribution towards affordable housing will be required. On schemes that fall below the threshold of 5 units or 0.2 hectares a financial contribution will be calculated based on the average land acquisition and build costs for affordable housing in the district. The contribution will be negotiated on a case by case basis to ensure that schemes remain viable.

On housing schemes above the threshold it is required that affordable housing should be provided on site, the basis being that if a site is suitable for market housing then it is suitable for affordable housing. Financial contributions will only be considered in exceptional circumstances where all other options have been explored including the possibility of off-site provision in accordance with Policy AH5.

Tenure and Dwelling Type

5.5 The type and tenure of affordable housing that is provided should help to create balanced and mixed communities where people have housing choices. For many people on waiting lists obtaining a mortgage is not a viable proposition and therefore a significant level of the provision needs to be for low cost rented accommodation. However, it is essential that there are opportunities available to enable people to get onto the property ladder and the provision of some intermediate housing will also be required. Policy AH3 provides an optimum breakdown of the tenures required.

Policy AH3 Tenure

The Council will seek to achieve the following breakdown of tenures affordable housing on sites:

- 2/3 low cost renting
- 1/3 intermediate housing

Whilst this breakdown provides an optimum scenario, each case will be dealt with on its own merits and there may be locations where different breakdowns will help to create more balanced and mixed communities.

5.6 The recent Housing Market Assessment identified that the housing market in the district is unbalanced with a high percentage of large detached properties. The study identified that there was a lack of smaller properties that would meet the needs of young families and the rising elderly population. To accord with the findings of the Housing Market Assessment Policy AH4 sets out the housing types needed.

Policy AH4 Housing Types

Affordable housing developments should consist of the following housing types in the proportions set out below:

- 1/3 two bedroom properties suitable for the elderly
- 1/3 two bedroom general needs properties
- 1/3 three bedroom properties

This breakdown of tenures and types may not be suitable on all housing developments. This merely provides an optimum scenario that best suits the housing needs of the district currently. Each planning application will be dealt with on its own individual merits providing the opportunity for negotiation to deliver a scheme that is most appropriate for its location.

Choice of RSL

5.7 The majority of the existing affordable housing stock in the District is provided and managed by a small number of RSLs. Planning permission will not be granted until a developer has entered into an agreement with an RSL to manage the properties upon completion.

5.8 To ensure the local housing needs in the District are best met, the Council has established a Preferred Partnership arrangement with four Registered Social Landlords (RSLs) to provide affordable housing in the District. The partner RSLs were selected through a process that involved the assessment of a wide range of matters relevant to the delivery and management of affordable housing.

5.9 In providing the required affordable housing on development sites, the Council would want private developers to work in collaboration with its Strategic Housing Team and enter into contract negotiations with a Registered Social Landlord selected as a Preferred Partner by the Bromsgrove District Council. A list of these preferred Registered Social Landlords who deliver affordable housing in the District can be found at the end of this document (Appendix B). Whilst the Council would like to encourage the use of their preferred partners other RSLs are available in the District.

5.10 Developers/ applicants are strongly advised to discuss the affordable housing requirements on individual development schemes with the Council's Strategic Planning and Strategic Housing Officers prior to submitting a planning application.

Car Parking Standards

5.11 The levels of car parking provided for affordable housing should be no different to the levels provided on general market housing and should therefore be in accordance with the Car Parking Standards provided within the Bromsgrove District Local Plan or any successor document. In the most sustainable locations lower levels of parking provision may be acceptable.

Open Space provision on Affordable Housing

5.12 Current guidelines for the provision of open space for new residential developments are contained within SPG11 Outdoor Play Space. It is recognised that the levels of provision required by this guidance may render developments containing significant levels of affordable housing uneconomical. Any open space provided for new housing schemes will be provided to reflect the nature of the development. On developments where family units are required play space must also be included, although the requirement for an element of open space should not render the development unviable. The level of open space/amenity provision will be assessed on a case-by-case basis.

Education Contributions

5.13 Education contributions will not be sought for the affordable housing element of any scheme in accordance with Worcestershire's SPG on Planning Obligations for Education Facilities. Should amendments to this guidance mean a contribution is required the Council will ask for the appropriate contribution to be made in line with the most recent policy.

Required Standard and Layout of Affordable Accommodation

5.14 The affordable housing provision should be of a high standard and must conform to the 'Design and quality standards' set out by the Homes and Communities Agency or any future replacement document issued by them. There is also a statutory requirement for affordable housing to achieve level 3 of the Code for Sustainable Homes. The Code for Sustainable Homes is a single national standard for the design and construction of sustainable homes.

5.15 All affordable housing schemes should be as well designed as possible and therefore developers are encouraged to achieve the Building for Life Standard. This is the national benchmark for well-designed housing and neighbourhoods. More information can be found at <http://www.buildingforlife.org>. Core Policy 4: Promoting High Quality Design within the Draft Core Strategy also provides up to date guidance on matters of design.

5.16 The importance of creating mixed and balanced communities in accordance with PSS3 cannot be overstated. On larger sites therefore the affordable housing will be dispersed throughout the application site. However, a balance needs to be struck between the housing management operational requirements of any affordable housing providers involved in a development site and the need to ensure mixed and balanced communities. There may be circumstances where there are Registered Social Landlord Housing management reasons for seeking a proportion of the affordable housing to be sited together but this should not prevent the remainder of the provision to be distributed across the development. The preference for the District Council is to distribute affordable housing amongst the market housing to avoid segregation.

5.17 The Council considers that in order to ensure the creation of mixed and integrated communities, affordable housing should not be visually distinguishable from market housing in terms of build quality and design, both internally and externally, materials, details, levels of amenity space and privacy.

Policy AH5 Design and Layout

Affordable must be built to a high standard and therefore should:

- Conform to 'Design and Quality Standards' set out by the Homes and Communities Agency or any future replacement document
- Obtain a minimum of Level 3 of the Code for Sustainable Homes; and
- Where possible achieve Building for Life Standards

To create mixed and balanced communities affordable housing should:

- Be 'Pepper-potted' throughout new developments; and
- Not be visually distinguishable from market housing

Off-site Affordable Housing Provision

5.19 There is a presumption that if a site is suitable for housing development it will also be suitable to provide affordable housing on the site. Only in exceptional circumstances and where full justification is provided will off-site provision be considered to be acceptable.

5.20 Where an alternative site is identified this must be acceptable to the Council as local planning authority, and must be capable of accommodating the provision for the original site and any new provision generated by the inclusion of open market dwellings on the new site. In addition it must be in the same settlement as the original site. Further detail of off-site provision requirements are set out within Policy AH6.

Policy AH6 Off-site Provision

Where a developer feels that there are good reasons to deliver affordable housing off-site this will need to be demonstrated to the Council at pre-application stage. Details of the following should be submitted:

1. The proposed development itself
2. A reasoned justification for not making provision on-site
3. Proposals for an alternative form of provision, together with an assessment of the prospects for delivery of that alternative

Off-site provision will only be favourably considered where all of the following tests are met:

1. The applicant and the District Council have both agreed at pre-application stage that there is an exceptional and positive justification for the off-site provision
2. Agreement has been reached at pre-application stage on the quantity, type and size of affordable housing which would otherwise have been provided on-site
3. The alternative form of provision would be equal or better in terms of the quality and quantity of the provision that would have been provided on-site.
4. The Council is satisfied at pre-application stage that there is a firm prospect of securing the alternative form of provision.

Legal Agreements

5.21 Section 106 of the Town and Country Planning Act 1990 allows for the use of legal agreements to ensure the delivery of those aspects of a scheme which are necessary for the development to be acceptable, but cannot be secured through a condition on a planning permission. The agreement will normally cover the following aspects of the scheme (in relation to affordable housing):

- The number of affordable homes;
- The phasing of the construction of the affordable homes in relation to the development of the rest of the site;
- The transfer of the homes to, and management by, a Registered Social Landlord (or as otherwise agreed by the District Council);
- The allocation of the homes to persons on the Home Choice Plus lettings scheme;
- The retention of the homes as affordable housing on a rented or shared ownership basis (subject to exceptions for mortgagees in possession and people who staircase to full ownership and people who exercise their Right to Acquire);
- The sizes and tenure of the affordable homes; and
- The standards of construction of the affordable homes.

6. Rural Exception Site Policies

6.1 PPS3 advocates the use of rural exception sites. This enables small sites to be used, specifically for affordable housing in small rural communities that would not normally be used for housing because, for example, they are subject to policies of restraint. Rural exception sites should only be used for 100% affordable housing in perpetuity. The Council will implement a Rural Exceptions Policy controlling how affordable dwellings on these sites will be allocated and the conditions which will be applied to them.

Policy AH7 Rural Exception Sites

In accordance with PPS3 the Council will permit small scale 100% affordable housing schemes in rural settlements where a housing need has been identified.

Early consultation with the Council's Planning and Housing sections is recommended to ensure that key issues are taken fully into account. A Rural Housing Enabler is also available to help with the identification of rural affordable housing needs.

To gain consent any planning application must conform with both Policy AH8 and AH9.

6.2 A Rural Lettings policy has been agreed by the Council and is intended to ensure that any dwellings constructed under the exceptions policy are allocated to those who are in most need and can demonstrate a local connection. The lettings criteria can be found in appendix A.

Local Housing Needs Survey

6.3 Any Rural Exception schemes proposed must be accompanied with evidence of local need in the form of a current local housing needs assessment. The assessment must show that there is need for affordable housing rather than demand.

Policy AH8 Local Housing Needs Survey

Every application for affordable housing under the Rural Exception Site Policy must contain a Local Housing Needs Survey. This survey should identify the following:

- **A genuine need to live within the village - A local connection will be required for this e.g. employed/live within the village or need to give or receive support from a close family member who lives in the village;**
- **A proven financial need for affordable housing - The applicant must be in a position where they are unable to get a sufficient mortgage to purchase a property on the open market; and**
- **The type and tenure of affordable housing - The survey should gather information ascertaining the size of the property required and whether social rented or intermediate accommodation is needed**

Site Location and Size

6.4 PPS3 emphasises that Rural Exceptions Site Policies should enable small sites to come forward in small villages where a need has been identified. Development sites need to be preferably located within existing settlement boundaries to prevent sprawl and ensure new housing is located close to existing village facilities. Where this is not possible sites should be adjacent to the village boundary and integrate into the fabric of the village ensuring that the intrinsic character of the village is retained. Under no circumstances will housing be considered on sites that are detached from settlements that appear as isolated housing developments in the open countryside.

Policy AH9 Site Location and Size

In Bromsgrove District the Rural Exceptions policy will normally only apply to the following villages: Adams Hill, Beoley, Belbroughton, Bournheath, Blackwell, Hopwood, Fairfield, Clent, Lower Clent, Dodford, Romsley, Burcot, Holy Cross and Rowney Green. Whilst this list is not exhaustive it provides clear guidance to the kinds of settlements where Rural Exception Sites will be considered.

The following sequential test will be applied to sites:

- In the first instance sites should be located within existing settlement boundaries
- Where there is not possible sites should be adjacent to the village boundary

Under no circumstances will housing be considered on sites that are detached from settlements that appear as isolated housing developments in the open countryside.

Any proposals should be proportionate to the size of the settlement in question and therefore it is considered that schemes should not generally be larger than 10 units. Under no circumstances will schemes be permitted where the number of units exceeds the need identified in the Housing Needs Survey.

7. Monitoring Review

7.1 Every year the Council completes an Annual Monitoring Report in December. The purpose of this is to monitor adopted policies and proposals and determine the effects they are having. The numbers of affordable housing completions are one of the indicators monitored each year and this will provide a clear indicator in relation to the success of this document. The monitoring process enables documents to be reviewed and modified if the desired effects are not being achieved.

7.2 The Core Strategy is likely to be submitted to the Secretary of State in 2010 and the Examination in Public may lead to minor changes in the document. This could lead to changes in the Core Strategy and therefore it may be necessary to review this SPD once the Core Strategy has been adopted.

CRITERIA AND ALLOCATIONS POLICY FOR THE LETTING AND ALLOCATION OF RURAL AFFORDABLE HOUSING DEVELOPED UNDER 'EXCEPTION SITE' POLICY.(CBL Version)

The Registered Social Landlord (Housing Association) managing the affordable housing development will assess all applications made requesting the allocation of a dwelling on the scheme **in the following order:**

1. All applicants wishing to be considered for Rented Housing within the proposed scheme must be registered on the Bromsgrove District Council Housing Register. The Council will also nominate applicants registered on the Housing Register for consideration for Shared Ownership or Re-Sale Price Covenant units where applicants have specified their wish to be considered when completing their application form and have expressed an interest in the dwelling through the Choice Based Lettings Scheme.

2. The following Local Connection Eligibility Criteria will be applied:

(The first phase of eligibility will be considered initially, and only if insufficient applicants are eligible will the other phases be considered in order.)

The first phase of eligibility will be restricted to:

- i) Local residents within the parish, with a minimum term of residence who want to remain in the locality but cannot afford to do so.
- ii) Those who have previously resided in the parish for a number of years and who need to return to the parish but cannot afford to do so and who qualify as one or more of the following :
 - a) Those who need to return to the parish to provide or receive support to / from a close family member living in the parish.
 - b) Those who are employed within the parish.
 - c) People with a confirmed offer of employment in the parish but who are deterred by the difficulty of finding and affording suitable accommodation.

A second phase of eligibility would include applicants who live outside of the parish but within an immediately adjoining parish who need to live in the parish but cannot afford to do so and who qualify as one or more of the following:

- a) Those who need to return to the parish to provide or receive support to / from a close family member living in the parish.
- b) Those who are employed within the parish.
- c) People with a confirmed offer of employment in the parish but who are deterred by the difficulty of finding and affording suitable accommodation.

A third phase of eligibility would include applicants who live outside of the parish but within the District of Bromsgrove who need to live in the parish but cannot afford to do so and who qualify as one or more of the following:

- a) Those who need to return to the parish to provide or receive support to / from a close family member living in the parish.
- b) Those who are employed within the parish.
- c) People with a confirmed offer of employment in the parish but who are deterred by the difficulty of finding and affording suitable accommodation

A fourth phase of eligibility would include applicants who live outside of the parish and outside of the District of Bromsgrove who need to live in the parish but cannot afford to do so and who qualify as one or more of the following:

- a) Those who need to return to the parish to provide or receive support to / from a close family member living in the parish.
- b) Those who are employed within the parish.
- c) People with a confirmed offer of employment in the parish but who are deterred by the difficulty of finding and affording suitable accommodation.

3. Applicants who qualify under the Local Connection Eligibility Criteria (Sect 2. Above) will then undergo an affordability assessment to establish that they are not in a position to afford an open market dwelling in the area. (The process will also establish an applicant's ability to afford shared ownership and fixed equity options).

Completed forms will be assessed in accordance with:-

- Current data on house prices and rents in The Parish;
- Financial requirements of average mortgage lenders and their lending policies;
- The availability of appropriate properties to meet identified needs e.g. accommodation to meet disabilities or health issues and tenure required.

4. Where applicants have both a relevant local connection (Sect 2 above) and fit the affordability criteria (Sect 3 above), their housing need will be prioritised in accordance with the housing need banding awarded and the effective date of this banding under the Choice Based Lettings Scheme policy, with the exception of:-

- Any housing need banding that was awarded for needs which will not be met by the offer of a dwelling in The Parish e.g. medical or welfare needs which would not be improved by living in The Parish;

Applicants will be nominated for dwellings in priority of need as identified by the banding awarded to applicants under the Choice Based Lettings Scheme and where applicants have been awarded the same banding, the effective date of the banding will determine the priority of applications. In the unlikely event of cases having the same banding and same effective date then the case with the longest local connection with the parish will have priority. Where applicants are purchasing an equity share but are unable to complete within a 6 - 8 week timescale they will be given a reduced priority.

5. Applications will be further prioritised in accordance with family size to property type/size, however to promote sustainable communities, a degree of under occupation may be allowed subject to agreement with the District Council.

In the event that no households can be identified from the above criteria within 3 weeks, allocations will be made to the most suitable applicants, having regard to their reasons for seeking a home in The Parish.

Definitions

The Parish	The Parish within which the affordable housing is located.
Immediately Adjoining Parish	A Parish with a common boundary and immediately next to the parish within which the affordable housing is located.
Minimum term of residence	Normally 5 years.
Number of years	Normally 5 out of the past 15
Close Family Member	Means parents, siblings, grandparents and children and such relationships through adoption. In exceptional circumstances, at the discretion of Bromsgrove District Council, more distant relatives may fall within the definition if they give to the applicant a level of support normally associated with those listed above. (' In exceptional circumstances, at the discretion of Bromsgrove District Council, other parties may fall within the definition if they can provide evidence that they give the applicant a level of support normally associated with those listed above'.)
Want	A specific reason to reside in the Parish within which the affordable housing is located.

Appendix B

PREFERRED RSL PARTNERS

Bromsgrove District Housing Trust

Buntsford Court
Buntsford Gate
Bromsgrove
Worcestershire
B60 3DJ

Contact: Mr Chris Lewis
Chris.lewis@bdht.co.uk

West Mercia Housing Group

Barnsley Hall
Barnsley Hall Road
Bromsgrove
Worcestershire
B61 0TX

Contact: Jason Macgilp
Jason.Macgilp@wmhousing.co.uk

Bromford Housing Group

9 Shaw Park Business Village
Shaw Road
Bushbury
Wolverhampton
WV10 9LE

Contact: Mr Mark Bridge
Mark.Bridge@bromford.co.uk

Servite Houses

41 Poplar Road
Kings Heath
Birmingham
B14 7AA

Contact: Mr Rob Pusey
Robp@servitehouses.org.uk



This Document can be provided in large print, braille, CD, audio tape and computer disc.



Bromsgrove
District Council

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Planning and Environment Services

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BROMSGROVE DISTRICT COUNCIL

LOCAL DEVELOPMENT FRAMEWORK WORKING PARTY

16TH DECEMBER 2009

DRAFT CORE STRATEGY

Responsible Portfolio Holder	Councillor Mrs J Dyer
Responsible Head of Service	Dave Hammond, Head of Planning & Environment Services
Non-Key Decision	

1. SUMMARY

- 1.1 The purpose of this report is to update Members on progress regarding the Draft Core Strategy.

2. RECOMMENDATIONS

- 2.1 That Members note progress on the development of the Draft Core Strategy.

3. BACKGROUND

- 3.1 Members will recall that at your last meeting it was reported that once the implications of the RSS EiP Panel Report have been fully assimilated, another version of the Draft Core Strategy would be prepared and consulted upon as soon as possible.
- 3.2 The next version of the Draft Core Strategy will include Strategic Site Allocations¹, incorporate any changes as appropriate as a result of the consultation and changes arising from any new evidence.
- 3.2 Receipt of the Proposed Changes Report of the Secretary of State is anticipated on 16th December 2009 and the document will then undergo a formal period of consultation of 12 weeks duration. A verbal update on the current situation regarding this matter will be provided at your meeting.

4.0 UPDATE

4.1 **Strategic Site Allocations**

The final version of the Core Strategy will include strategic housing and employment allocations, which will clearly identify where the significant housing and employment growth will take place over the period up to and potentially beyond 2026. A background report is being prepared which sets out the national and regional planning policy context and discusses the planning history on the potential strategic sites at Perryfields Road, Whitford Road and Norton Farm. The history section reflects on their designation as ADRs through the Local Plan process and Inspectors opinions of the sites

¹ Strategic Site Allocation- those sites considered central to achievement of the strategy

- after the two Public Inquiries. This is a key document which will help inform and be informed by both the Green Infrastructure Study and also the work on accessibility and highways as outlined below. Relevant evidence such as future water supply, flooding and landscape character are also being fed into this document.
- 4.2 Meetings are ongoing with developers and stakeholders to discuss the provision of evidence and address any infrastructure issues as detailed below:
- 4.3 Developer meetings
- 4.4 The land to the western edge of Bromsgrove Town offers potential to provide a substantial new housing and employment development . This site is largely controlled by volume house builders, Worcestershire County Council (WCC) and the Homes and Communities Agency (HCA). It is important to be able to prove that these sites are deliverable for the Core Strategy to be judged sound. We are continuing to work closely with the developers in a coordinated manner to masterplan the sites to ensure a cohesive overall development. The advice of the Advisory Team for Large Applications (ATLAS) who are part of the HCA and have considerable experience in delivering large scale growth is currently being sought.
- 4.5 Infrastructure meetings
- 4.6 Similarly to meeting with the developers we also have to ensure any proposals within the Core Strategy can be serviced by sufficient physical and social infrastructure in a viable manner. Discussions are ongoing to ensure the submission version of the Core Strategy deals sufficiently with delivering growth. Meetings have therefore been held with organisations such as the Learning Skills Council, WCC education, Worcestershire PCT, BT Openreach, Severn Trent Water, HW Fire and Rescue, West Mercia Police, National Grid, Highways Agency and so on.
- 4.7 **Green Infrastructure² (GI)**
- 4.8 The requirements of new national planning guidance on sustainability, biodiversity, climate change, flood risk, and renewable energy all highlight the importance of the natural environment in strategic planning. Whilst much of the evidence already exists to support the current Draft Core Strategy policies on green issues, it is now best practice to bring all these elements into a single report which examines their inter-relationships and opportunities for improvement. This is stressed in responses to the Draft Core Strategy consultation from bodies such as Worcestershire County Council and Natural England. A Green Infrastructure Study is now being carried out to strengthen the evidence base in this respect.

² Green Infrastructure- *Green Infrastructure is the network of green spaces and natural elements that intersperse and connect our cities, towns and villages. It is the open spaces, waterways, gardens, woodlands, green corridors, wildlife habitats, street trees, natural heritage and open countryside. Green Infrastructure provides multiple benefits for the economy, the environment and people.*

4.9 **Highways Accessibility modelling**

The delivery of policies within the Core Strategy, especially those which allocate new land uses will be significantly affected by the ability of the current physical infrastructure to support them or the creation of new infrastructure. Without proof that the policies can actually be delivered the Core Strategy is likely to be found unsound.

- 4.10 One issue which has so far been largely untested is the ability of the current highways infrastructure to support varying levels of new development. Since publication of the Panel Report progress on this matter has been significant. WCC have prepared project briefs for an accessibility assessment, examining the potential of development sites and a traffic modelling assessment. The briefs are drafted in such a way as to allow further work to be commissioned to support the Redditch cross boundary growth when required. It is hoped that the work will be part funded by both WCC and BDC. A further brief is being prepared to commission work to look at the possibility of building a new link road around the western side of Bromsgrove Town. Detailed modelling of new road proposals could be lengthy and also very expensive. If this work is required the developers in control of the expansion sites will be approached for funding.

4.11 **Redditch Growth**

Officers from both authorities have continued to meet with the aim of progressing this complex issue. Meetings have also taken place with GOWM to inform and obtain feedback on ideas being explored. Meetings are also scheduled at Member level with representatives from both Authorities.

- 4.12 Subject to Member's approval it is intended to conduct a joint consultation event detailing various options for the location of potential Redditch growth, both within the Borough and adjacent to its boundary within Bromsgrove. It is intended that this joint consultation will take place early in the New Year. It is envisaged a leaflet will be prepared and consulted upon via the normal communication routes including drop in sessions at appropriate locations throughout Redditch.

5. **NEXT STEPS**

- 5.1 Subject to advice from Government Office it is anticipated that the next version of the Draft Core Strategy, which will incorporate strategic site allocations will be prepared for consultation purposes by Summer 2010, with submission scheduled for late 2010 and Examination In Public early in 2011.

6. **FINANCIAL IMPLICATIONS**

- 6.1 There are no direct financial implications of receiving this report. However the transport modelling work will require funding which may be allocated within the existing LDF budget.

7. LEGAL IMPLICATIONS

- 7.1 Development Plan for the District required by the Planning and Compulsory Purchase Act 2004, and prepared in accordance with The Town and Country Planning (Local Development) (England) Amendment Regulations 2008.

8. COUNCIL OBJECTIVES

8.1 Objective 1 Regeneration

The Draft Core Strategy identifies the long term spatial vision for the district this includes key areas such as the regeneration of the town centre.

8.2 Objective 3 Sense of Community and Wellbeing

Extensive consultation has been carried out at various stages during the preparation of the Draft Core Strategy and in the course of the preparation of the supporting evidence base. The Draft Core Strategy is a publicly available document that identifies the vision for the District up to 2026.

Furthermore, proposed policies within the Draft Core Strategy direct where and when new housing should be built across the district up to 2026. It examines affordable housing, to be supplemented by an Affordable Housing SPD which will aim to maximise affordable housing provision across the district.

8.3 Objective 4 Environment

The Draft Core Strategy sets out the long term spatial vision for the district and the strategic policies required in delivering that vision. It attempts to tackle social, economic and environmental issues affected by the implementation of various policies. Climate change is a central theme of the Draft Core Strategy and it contains specific policies which address this issue in terms of both adaptation and mitigation.

9. RISK MANAGEMENT INCLUDING HEALTH AND SAFETY CONSIDERATIONS

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

- Inability to produce development plan document which is judged to be sound by the planning inspectorate and therefore resulting in non legally compliant Strategic planning service

- 9.2 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

10. CUSTOMER IMPLICATIONS

- 10.1 The Core Strategy is likely to have an impact on many different aspects of people's lives including living, working, shopping, leisure and education. Public

consultation has been and will be extensively undertaken throughout the process.

11. EQUALITIES AND DIVERSITY IMPLICATIONS

11.1 An equalities impact assessment will be carried out on the final submission version of the strategy, although attempts will be made to consult with all sections of society as the plan progresses towards completion.

12. VALUE FOR MONEY IMPLICATIONS

12.1 Whilst there are no direct value for money implications connected with this report, methods to provide value for money are continuously being explored, for instance via joint procurement for external consultancy work identified as a requirement to provide a robust evidence base for the Core Strategy and striving to carry out consultation on various documents concurrently thereby achieving cost savings.

13. CLIMATE CHANGE AND CARBON IMPLICATIONS

13.1 The issue of climate change is a central theme in the Core Strategy. Many of the policies have the potential to have a significant impact on mitigating and adapting to the effects of climate change and contributing to a reduction in carbon emissions.

14. 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 core strategy forms an essential part of the LDF and the policies contained within the core strategy will shape future development.
Environmental	Draft Core strategy contains policies which directly impact on the environment.

15. OTHERS CONSULTED ON THE REPORT

Portfolio Holder	No
Chief Executive	No
Executive Director - Partnerships and Projects	No
Executive Director - Services	No

Assistant Chief Executive	No
Head of Service	Yes
Head of Financial Services	Yes
Head of Legal, Equalities & Democratic Services	No
Head of Organisational Development & HR	No
Corporate Procurement Team	No

16. WARDS AFFECTED

All wards.

CONTACT OFFICER

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BROMSGROVE DISTRICT COUNCIL

LOCAL DEVELOPMENT FRAMEWORK WORKING PARTY

16th DECEMBER 2009

REGIONAL SPATIAL STRATEGY PHASE 3 REVISION - UPDATE

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

1. SUMMARY

- 1.1 This report outlines the changes made to the RSS revision process in respect of the Phase 3 element and outlines the implications for the District.

2. RECOMMENDATION

- 2.1 Members note the contents of this report

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 a number of issues 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, employment land, town and city centres, transport, and waste. The Panel Report has now been published and we are awaiting the proposed changes from the Secretary of State.

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. This report updates Members on the progress of Phase 3.

- 3.2 Initially when the RSS revision process was outlined it was intended to be completed significantly quicker than it is taking. The intervention of the Government in to Phase 2 in December 2007 which instigated the NLP study and caused a delay of at least 12 months has had a knock effect on Phase 3. Originally Phase 3 was to follow the same format as Phase 2 with an Options consultation followed by a Preferred Options and subsequent Examination in Public (EIP). This is now not the case.

- 3.3 The Options consultation did take place and Officers submitted informal comments on behalf of the Council which are attached as Appendix 1. Due to the nature of the issues being considered in Phase 3 the comments submitted could not address all the issues as many were outside the role and function of a District Council and were more relevant to the County Council as a Waste Planning Authority.
- 3.4 In July 2007, the Government published a Sub-National Review of Economic Development and Regeneration. Among other things, the Government proposes to bring together the Regional Spatial Strategies and the Regional Economic Strategies into a single Regional Strategy for each of the English regions.
- 3.5 In the light of these changes, there was a "stocktake" meeting in September 2009 involving officers from the WMRA, GOWM and AWM, to consider how the WMRSS Phase Three could be taken forward in the most effective way. It was agreed at that meeting that the Phase Three issues should be progressed through the new Regional Strategy process rather than through the WMRSS Phase Three Revision.
- 3.6 It was agreed that the Phase Three issues be taken forward in one of two ways:
- 3.7 a) **Policy Statements** which will provide a framework for relevant policies in the preparation of Local Development Frameworks. Two Policy Statements will be developed which cover,
- Provision of pitches for Gypsies & Travellers and Travelling Showpeople,
 - Sub-Regional Apportionment of Construction Aggregates
- 3.8 GOWM has confirmed that they expect local authorities to give the Policy Statements similar weight to that of a submitted draft RSS. Also Policy Statements will carry weight in relation to Development Plan Document examinations and planning inquiries.
- 3.9 b) **Policy Recommendations** which will feed directly into the preparation of the new Regional Strategy. The majority of issues within the Phase Three Options document will be progressed in this manner are listed in the table below:

Rural Services

Rural Services

Culture, Sport & Tourism

Culture & Sport - including relevant historic environment issues

Tourism - including relevant historic environment issues

Quality of the Environment

Integrated Approach to Management of Environmental Resources
Restoring Degraded Areas & Managing & Creating High Quality New Environments
Greenery, Urban Green Space and Public Spaces
Protection & Enhancement of Historic Environment
Conservation, Enhancement & Restoration of the Region's Landscape
Protecting, Managing & Enhancing Region's Biodiversity & Nature Conservation Resources
Forestry & Woodlands
Protection of Agricultural Land
Air Quality
Energy Efficiency
Renewable Energy - Targets
Renewable Energy - Criteria for Ensuring Appropriate Locations
Positive Uses of Green Belt

Minerals

Safeguarding Mineral Resources
Future Brick Clay Provision

- 3.10 Work on developing the Policy Statements and Recommendations is progressing with a view to final sign-off by the Joint Strategy and Investment Board at its meeting on 3rd March 2010. Policy Statements and Policy Recommendations will be tested through relevant appraisal and assessment processes (Sustainability Appraisal, Habitats Regulations Assessment and Rural Proofing) to provide rigour and weight to the final outputs
- 3.11 A draft version of the Provision of pitches for Gypsies & Travellers and Travelling Show people policy statement has been produced which indicates that Bromsgrove District should provide 14 new residential pitches and 0 new transit pitches in the period up to 2017. This allocation has taken into account the response submitted by Officers as well as many other sources of information. A key focus of the policy statement is the adoption of the principle of redistribution of pitches where the surplus need from one authority where its need is over 42 pitches is transferred to adjacent authorities where there is a surplus. In the case of Bromsgrove we have been allocated additional pitches from Wychavon although still only the minimum amount deemed to be suitable for a sustainable community namely 14 pitches, which is an increase in 11 pitches from the Preferred Option suggested by Officers. This policy approach has been chosen due to the fundamental and irreconcilable differences in responses to the options consultation.

4. FINANCIAL IMPLICATIONS

- 4.1 None

5. LEGAL IMPLICATIONS

5.1 None

6. COUNCIL OBJECTIVES

6.1 Policies within the RSS panel report and the subsequent Local Spatial Planning policies that follow in the Core Strategy and other planning documents will all have an impact on the following Council priorities and objectives.

1. **Regeneration**

Council Priority 1 - Economic Development

Council Priority 2 - Town Centre

3. **Sense of Community & Wellbeing**

Council Priority 5 - Children & Young People

Council Priority 6 - Crime & Fear of Crime

Council Priority 7 - Older People

Council Priority 8 - Community Engagement

Council Priority 9 - Housing

4. **Environment**

Council Priority 10 - Climate Change

7. RISK MANAGEMENT INCLUDING HEALTH & SAFETY CONSIDERATIONS

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

- Inability to produce and adopt local spatial planning policies which adequately reflect the policies in the RSS or new integrated single strategy

7.2 These risks are being managed as follows:

Risk Register: Planning and Environment

Key Objective Ref No: 5

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

Key Controls: Regional Spatial Strategy (RSS) - Council has responsibility to engage in formulation of regional planning policies

Action: Appear at Regional Spatial Strategy (RSS) Examination in Public

8. CUSTOMER IMPLICATIONS

8.1 None

9. EQUALITIES AND DIVERSITY IMPLICATIONS

9.1 None

10. VALUE FOR MONEY IMPLICATIONS

10.1 None

11. CLIMATE CHANGE AND CARBON IMPLICATIONS

11.1 Many of the topics which we're to be dealt with under phase 3 which will now be dealt with under the single regional strategy have significant impacts on climate change and carbon emissions as identified in para 3.9 above. As the policies develop it will become easier to assess the likely implications and as will all Strategic planning work full sustainability Appraisal will be undertaken to ensure they are the most suitable policy choices.

12. OTHER IMPLICATIONS

Procurement Issues
Personnel
Governance/Performance Management
Community Safety including Section 17 of Crime and Disorder Act 1998
Policy
Biodiversity

13. OTHERS CONSULTED ON THE REPORT

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

14. WARDS AFFECTED

All Wards

15. APPENDICES

Appendix 1 Officers comments on RSS phase 3 options

16. BACKGROUND PAPERS

None

CONTACT OFFICER

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West Midlands Regional Spatial Strategy Phase Three Revision Options Consultation 29th June 2009 – 14th August 2009

Consultation Questionnaire To be completed and returned by 14th August 2009

This questionnaire is divided up into five sections each one refers to a chapter in the main Options Consultation document.

Critical Rural Services	Page 2
Gypsies, Travellers and Travelling Showpeople	Page 3 - 4
Culture Sport and Tourism	Page 5
Quality of the Environment	Page 6 -11

Minerals	Page 12 - 15
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Within each section there are a series of questions, each one has a unique reference (e.g. CRC1 for critical rural services). If you need more space to respond to any of the questions please attach extra sheets and refer to the question reference number.

You do not need to complete all of the sections in the questionnaire. It is acceptable to focus on the issues and topics that are most relevant to you/your organisation.

Please ensure that your details are included with your response by completing the 'Your Details' box below.

Your Details

Name: Mike Dunphy

Job Title: Strategic Planning Manager

Organisation: Bromsgrove District Council

Address: The Council House, Burcot Lane Bromsgrove, B60 1AA

Email: m.dunphy@bromsgrove.gov.uk

The questionnaire can also be completed online. Visit the homepage of the Assembly's website at www.wmra.gov.uk for more details.

**To be completed and returned
by 14th August 2009**

Mail: WMRSS Revision,
West Midlands Regional Assembly,
Albert House, Quay Place,
92-93 Edward Street,
Birmingham B1 2RA

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Please note that the West Midlands Regional Assembly has a strict policy for dealing with any offensive comments/representations. If we feel that any submission received is offensive, we will, in the first instance, contact the author and request that the comments are re-phrased before being re-submitted. If the material submitted continues to be offensive then it may be forwarded to the relevant authorities.

Question CRC1: Studies have shown that it is very difficult to define rural services as “important” or “critical”, and that pursuing these definitions is unlikely to be of much value. Do you agree with this view?

Please tick one box Yes No

If no, please provide reasons and a list of those rural services that you consider to be “critical”.

The issues that exists across the region are so varied and in many cases so localised we do not believe trying to identify those which are regionally important or critical is possible and it should be left to more detailed planning in LDFs to determine what are the specific issues for a particular districts or settlements.

Question CRC2: The SQW Report identified significant service deprivation issues for people in “accessible rural” areas whose access to transport is limited (see page 21). Do you think more attention should be given to meeting the service needs of this group?

Please tick one box Yes No

If yes, please provide reasons (and where possible, evidence) for your answer.

The needs of all rural communities need to be address and focussing too much on one particular demographic could be to the detriment of other rural communities. Access to public or private transport is only one element of rural service deprivation; this issue needs to be addressed in conjunction with other factors which may limit people access to services in ‘accessible rural areas.’

The term ‘accessible rural areas’ is one which either needs to be clearly defined or removed completely, the lack of clarity about what the accessibility factors which have been used to define accessible rural areas could be open to misinterpretation.

Question CRC3: Arguments have been put forward that new development should be allowed in settlements lacking a service base in order to reverse a cycle of decline in such places. (“Planning for Sustainable Communities” – CRC; “A Living and Working Countryside” – Taylor Review). Do you agree with this view?

Please tick one box **Yes with reservations please see below** No

If yes, please provide your reasons and any relevant evidence, including identified locations, and suggestions.

The introduction of new, or continued provision of services in rural settlements is an essential

element of the rural renaissance although this need has to be considered within the wider context of the RSS and the aim of urban renaissance. The development that maybe required to secure any new service provision in smaller settlements cannot simply override other significant RSS aims and other national policies such as Green belts. The district of Bromsgrove is 91% green belt which consistently is faced within pressure for development stemming from the MUA. Any new residential development within the district to support the provision of new services needs to be carefully planned to meet identified local needs and not simply be used in an attempt to meet higher levels of housing which came under much scrutiny through the RSS phase 2 preferred option production and subsequent EIP. The council recognises the importance of providing access to service across the district but the provision should not be predicated on the unsustainable distribution of new residential development. The level of development required to support these new services is unspecified although likely to be significant at the local scale which would require significant alteration to the green belt, the council question if this solution to increasing service delivery is one which can be achieved whilst still maintaining the focus of development to be the MUA, and the continued protection of the green belt.

The economics of rural service provision is complex and will need to be considered carefully in any subsequent policy. It would need to be clearly evidenced that the market would genuinely locate services in areas where there is currently a deficit and where new development is planned to address this. Without the genuine commitment of the service/retail sector to locate to these areas any new development would simply exacerbate the lack of services for rural communities.

Other initiatives such as improved IT infrastructure and improved public transport should also be considered as an alternative to further development in areas where the lack of adequate broadband facilities/ bus provision could go some way to improving the level of services to a settlement.

Question CRC4: Three policy Options for rural service developments are suggested (see pages 22-23). Please state if you have a preferred Option, and the reasons for your preference.

Please tick one box Option 1: Sustainable – Climate Change Driven
 Option 2: Community Based
 Option 3: Status Quo

Please provide reasons for your preference

Option 1 is supported as all development urban or rural should be driven by the all the principles of sustainability and not just climate change, taking this as a starting point option 2 then also becomes relevant as the need of a community influence successful sustainable development. As significant issues have been identified in the provision of services in rural areas option three cannot be considered.

Under option 1 the concentration of services in the larger settlements is supported although this

should not rule out any provision which could be provided on a more localised scale for isolated rural communities, if too much focus is placed on delivering the majority of services in these settlements opportunities might be lost to provide in other locations as service providers simply look to the larger towns. As stated in the response to CRC3 the wider aims of the RSS will need to be considered when looking to locate development to support the provision of services to the more rural areas of the region.

Improved public transport is one which the council strongly supports and believes further efforts should be concentrated to improve the penetration, frequency and variety of public transport that serves rural communities.

Option 2 is also supported and one which the council believes already takes place to some extent in the formulation of various plans and strategies at the local level including the ongoing work of the LSP and with the production of the LDF which has involved significant local engagement.

The concerns about a scattered distribution of housing development is one which the district council share although accept that some small scale development in some of the more isolated settlements is needed, although probably not at a level which would support the significant investment required to providing additional rural services. The council supports additional development to meet identified local affordable housing needs but would look to other ways of increasing access to services before allocating additional non needs related residential development to small settlements.

Question CRC5: For your preferred Option above please suggest how the Option might be delivered at the regional level, taking into account the relevant key issues and implications in the Critical Rural Services chapter.

As already stated the issues for rural services are varied across the region and not one which the RSS can deal with in any great detail. Local strategic planning and particularly ongoing work with core strategies will identify the local issues which need addressing. It is important that policies contained in the RSS support a wide range of potential solutions to ensuring the service needs of all rural communities are met. The requirements of the planning system and in particular the SA process will ensure that both options 1 and 2 are considered fully in any new polices introduced at a local scale.

Gypsies and Travellers

Question GTQ1: Do you agree with the total residential pitch requirements (939 pitches), as identified by the sub-regional Gypsy and Traveller Accommodation Assessments?

Please tick one box Yes No

If no, please provide reasons (and where possible, evidence) for your answer.

The council has no evidence to suggest the figures contained in the GTAA are incorrect

Question GTQ2: Do you think the three Options on page 35 for the provision of residential Gypsy and Traveller pitches provide a good range of solutions?

Please tick one box Yes No

If no, do you think there is another Option which could be explored? Please provide reasons (and where possible, evidence) for your answer.

The 3 options provide a broad range of solutions.

Question GTQ3: Which of the three Options on page 35 for the provision of residential Gypsy and Traveller pitches do you prefer and why?

Please tick one box Option 1 Option 2 Option 3

Please provide reasons for your preference.

Option 1 is most appropriate as demand should be met where it arises. Traditionally Bromsgrove District has been an area of low demand and it is therefore considered that any provision above this would lie vacant. Generally gypsies and travellers are attracted to areas where there a high number of seasonal jobs (e.g. fruit picking) in areas such as Wychavon. This demand cannot be re-distributed as Bromsgrove does not many characteristics that are attractive to travelling communities.

Question GTQ4: You may wish to consider the need for residential pitch requirements in specific parts of the West Midlands Region (for example in a particular city/sub-region/county. Please state where and provide any comments on this specific area and explain your reasons.

Question GTQ5: Do you think the numbers allocated in Table 2 on page 40 for Transit provision (244 pitches) will meet the accommodation needs of Gypsies and Travellers?

Please tick one box Yes No

If no, please provide reasons (and where possible, evidence) for your answer.

The council has no evidence to suggest the figures contained in the GTAA are incorrect

Gypsies and Travellers continued

Question GTQ6: Do you think the geographical distribution of pitches for Transit provision indicated in Table 2 on page 40 will meet the accommodation needs of Gypsies and Travellers?

Please tick one box Yes No

If no, please provide reasons (and where possible, evidence) for your answer.

Question GTQ7: Do you think the draft Policy for Transit provision should be strengthened? (see page 39).

Please tick one box Yes No

Please provide reasons (and where possible, evidence) for your answer.

Travelling Showpeople

Question TSQ1: Do you think the numbers allocated in Table 3 on page 42 for Travelling Showpeople (118 plots) during the five year period of 2007-2012 will meet their accommodation needs?

Please tick one box Yes No

If no, please provide reasons (and where possible, evidence) for your answer.

Question TSQ2: Which of the two Options in Table 3 on page 42 for the distribution of additional plots for Travelling Showpeople do you favour?

Please tick one box Option 1 Option 2

Please provide reasons for your preference or if you think there is another Option which could be explored please provide reasons (and where possible, evidence) for you answer.

Option 1 is more appropriate as it is based on the GTAAs, which are most robust evidence available.

Question TSQ3: Do you agree that the plot numbers for Travelling Showpeople should be allocated on a County basis, rather than down to district level?

Please tick one box Allocated on a County basis Allocated on a District basis

Please provide reasons for your preference.

Due to the nature of the travelling communities and the limited data available allocations to each county is probably most appropriate.

Question CST1: Which of the Options on page 53 do you think should be used as a basis of revising Policy PA10 Part A and why?

Please tick one box Option 1: Remove the portfolio
 Option 2: Update portfolio to include all regionally significant assets

If you have chosen Option 2, what assets (see B.O.P. report, item 11 on page 59) do you think should be added/removed and explain why you think they are or are not of regional significance.

The District Council has no firm view on the current list and also its continued inclusion within the RSS, although would point out that attempting to highlight those assets of particular significance in an area which is largely subjective will inevitably lead to debate from various groups and organisations with conflicting interests. Including either the current list or an amended one could have detrimental effect on other assets across the region if it is seen as only those listed deserve protection and investment.

Question CST2: Do you think that Policy PA10A should “protect”, as well as improve existing strategic cultural assets from development?

Please tick one box Yes No

If yes, please provide reasons for your answer and suggest how the WMRSS could protect the assets.

Where assets are not currently protected by and existing policy then protection is important although as the options document points out the protection should not be seen as restriction on further investment and growth of the asset if it can be done without damaging the assets original character .

Question CST3: Which of the Options on page 57 do you think should be used as a basis for revising Policy PA10 Parts B and C to address any gaps in strategic culture, sport and tourism assets provision in the Region?

Please tick one box Option 1: Retain existing PA10 B & C
 Option 2: Update existing PA10 B & C
 Option 3: Develop a new policy in addition to PA10 B & C

If you have selected Option 2 or 3, what new criteria do you consider are important to add and why?

Both options 2 and 3 are possible ways of enhancing the current regional policy with regards to culture tourism and sport . the focus of the policy should be just wider than economic development and should aim not only attract people into the region to experience the assets on offer but should also aim to tackle the lack of participation that exists within the region especially in respect of sporting activities.

Question CST4: Do you agree with the strategic gaps identified in the Burns Owens Partnership (BOP) report? (see page 54).

Please tick one box Yes No

If no, are there any other strategic gaps which you consider exist and what evidence exists to support your case?

The district council has no reason to disagree with the findings of the report, although think there are more small scale local gaps in provision which will be highlighted through LDF preparation.

Question CST5: Do you think the Options on pages 53 and 57 could help to address poor quality and access issues in relation to culture, sport and tourism assets?

Please tick one box Yes No

What suggestions do you have as to how the WMRSS can best address quality and access issues, and any others, which you might think are relevant for culture, sport and tourism? Please provide reasons (and where possible, evidence for your suggestions).

Although as stated above significant work needs to be done on a more local scale through the work of LSPs and the development of LDFs to ensure that more localised assets are utilised and improved alongside those with perceived regional significance.

Policy QE2 – Restoring Degraded Areas and Managing and Creating High Quality New Environments

Question ENV1: Do you agree with the suggested list of issues a – f on page 65 that a revised Policy QE2 could include?

Please tick one box Yes No

Are there any suggested issues which you think a revised Policy QE2 should not include? If so, please tell us why you think these issues should be excluded.

As a district with very little brownfield land remaining, we would support all policies which attempt to ensure the most effective and efficient use of Brownfield land across the region especially in the MUA in preference to development of Greenfield land in green belt districts where only local needs should be met as a priority.

The district council does not have any influence on the West Midlands brownfield land working group and would suggest a new body is set up to ensure the views of all stakeholders are sought on any polices for the development of brownfield land.

Are there any additional issues which you think a revised Policy QE2 should include? If so, please tell us what issues you think should be included and why.

Question ENV2: Which Option on page 65 would you prefer Policy QE2 to follow, and why?

Please tick one box Option 1: Needs Led
 Option 2: Growth Led
 Option 3: Competitiveness Led

Please provide reasons for your answer.

A combination of elements of all three options would be the most suitable depending on local circumstances and informed by evidence generated by the production of LDFs. The diverse nature of the region means not one approach would be suitable for all areas. as the levels of growth and amounts of Brownfield land and development potential differs so markedly across the region no one solution would meet the requirements of all stakeholders.

.....
Question ENV3: Are there any other strategic options that you think we should consider in relation to restoring degraded areas and managing and creating high quality new environments?

Please tick one box Yes No

If yes, please explain your option(s) and provide reasons for your answer.

.....
Question ENV4: Which, if any, of the means for implementing Policy QE2 outlined in a - c on page 66 do you think would be most appropriate, and why?

Please provide reasons for your answer.

(a) would be relevant to Bromsgrove District although it would only give a measure of implementation rather than any mechanisms to ensure the right development is taking place.

(b) would not be relevant to Bromsgrove due not being in the MUA or regeneration zone, and also the lack of Brownfield land, if not all districts prepare action plans this process could potentially miss out on development taking place in lesser growth areas where the priorities mean an action plan is not prepared.

(c) could be appropriate in certain circumstances although wording at the moment presumes that barrier to development can always be alleviated, which may not always be the case.

Policy QE4 – Greenery, Urban Green Space and Public Spaces

Question ENV5: Do you agree with the list of issues a – f on page 67 that it is suggested Policy QE4 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE4 should not include? If so, please tell us why you think these issues should be excluded.

Agree with the changing of the title to Green Infrastructure

The policy should include as much information as possible to ensure green infrastructure planning is carried out consistently across the region, it should also clearly identify who is responsible for leading on green infrastructure, currently districts or groups of districts are preparing studies, although much of the information and resource to complete these studies sits at a county level.

Are there any additional issues which you think a revised Policy QE4 should include? If so, please tell us what issues you think should be included and why.

Policy QE5 – Protection and Enhancement of the Historic Environment

Question ENV6: Do you agree with the list of issues a – j on page 68 that it is suggested Policy QE5 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE5 should not include? If so, please tell us why you think these issues should be excluded.

Section C in the superseded document relating to the value of conservation led regeneration should be included in the revised document.

Also Para (c) of the revised document stresses the importance of considering the wider townscape, but this should not be at the expense of detailed site specific analysis. The text as suggested implies that the wider analysis is more important than the individual site, and should be amended to stress the value of both assessments.

Are there any additional issues which you think a revised Policy QE5 should include? If so, please tell us what issues you think should be included and why.

Policy QE6 – The Conservation, Enhancement and Restoration of the Region’s Landscape

Question ENV7: Do you agree with the list of issues a – i on page 69 that it is suggested Policy QE6 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE6 should not include? If so, please tell us why you think these issues should be excluded.

We would like clarification on the type of references that would be made under point d) and would also question how specific references would be to urban fringe areas where change will be taking place. this is likely to have already been or should be determined by Core strategies and not at a regional level.

Are there any additional issues which you think a revised Policy QE6 should include? If so, please tell us what issues you think should be included and why.

Policy QE7 – Protecting, Managing and Enhancing the Region’s Biodiversity and Nature Conservation Resources

Question ENV8: Do you agree with the proposed targets for improving priority habitats set out in Annex C on page 123 and if not, why?

Please tick one box Agree with proposed targets Disagree with proposed targets

If you disagree, please provide reasons for your answer.

Policy QE7 – Protecting, Managing and Enhancing the Region’s Biodiversity and Nature Conservation Resources (continued)

Question ENV9: Do you agree with the list of issues a – i on page 70 that it is suggested Policy QE7 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE7 should not include? If so, please tell us why you think these issues should be excluded.

- (d) *In Worcestershire, the Worcestershire Biodiversity Partnership is going to develop the local opportunity map rather than each local authority in the County developing their own local opportunity maps in the LDF process. This is considered more appropriate especially when green corridors will cross local authorities’ boundaries. Similar to online Landscape Character Assessment map, the local opportunity map could be considered as a living map. This is considered more appropriate especially when species can move across and that where they move during the change of climate is uncertain. Also, new surveys may give different results which lead to the revision of the local opportunity map.*
- (g) *It is unlikely that development will be permitted in local sites unless the important features or the condition of the local sites are protected or enhanced through the development (the NERC Act). At the same time, there is nothing that the local authority/ planning system could do if there is no development and the site is in private ownership.*
- (h) *Recognise that there could be conflicts between geodiversity and biodiversity? And that geodiversity will affect habitats and hence location of biodiversity.*

Are there any additional issues which you think a revised Policy QE7 should include? If so, please tell us what issues you think should be included and why.

Question ENV10: Should the focus of Policy QE7 be mainly on the existing Biodiversity Enhancement Areas, or alternatively those areas identified in the Regional Opportunities Map (on page 72), and why?

Please tick one box Existing Biodiversity Enhancement Areas
 Areas identified in Regional Opportunities Map

Please provide reasons for your answer.

No comment due to the council currently having no dedicated officer dealing with biodiversity issues and as such rely on the county council and Natural England and other organisations for inputs on biodiversity matters.

Policy QE8 – Forestry and Woodlands

Question ENV11: Do you agree with the list of issues a – i on page 73 that it is suggested Policy QE8 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE8 should not include? If so, please tell us why do you think they should be excluded.

Are there any additional issues which you think a revised Policy QE8 should include? If so, please tell us what issues you think should be included and why.

Protection of Agricultural Land

Question ENV12: Do you agree with the list of issues a – f on page 74 that it is suggested that the text relating to the Protection of Agricultural Land could include?

Please tick one box Yes No

Are there any suggested issues which revised text for Protection of Agricultural Land should not include?

If so, please tell us why you think these issues should be excluded.

The district council supports the protection of Agricultural land although accepts if housing targets identified in the phase 2 revision are to be met then agricultural land in close proximity to existing settlements may have to be lost, this fact should be reflect in any revised wording.

Are there any additional issues which you think revised text on the Protection of Agricultural Land should include?

If so, please tell us what issues you think should be included and why.

Policy QE9 – The Water Environment

Question ENV13: Do you agree with the list of issues a – i on page 75 that it is suggested Policy QE9 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE9 should not include? If so, please tell us why you think these issues should be excluded.

The issues raised seem to repeat those being addressed by PPS25, more regional specificity should be included if this policy area is to have real benefit for the region.

Are there any additional issues which you think a revised Policy QE9 should include? If so, please tell us what issues you think should be included and why.

Air Quality

Question ENV14: Do you agree with the list of issues a – d on page 76 that could be included in text relating to Air Quality?

Please tick one box Yes No

Are there any suggested issues that you think should not be included in revised text for Air Quality? If so, please tell us why you think these issues should be excluded.

Current air quality issues in Bromsgrove are being assessed through the draft core strategy and AQMAs

Are there any additional issues which you think revised text for air quality should include? If so, please tell us what issues you think should be included and why.

Integrated Approach to the Management of Environmental Resources

Question ENV15: Do you agree with the list of issues a – i on page 79 that it is suggested Policy QE1 could include?

Please tick one box Yes No

Are there any suggested issues which a revised Policy QE1 should not include? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think a revised Policy QE1 should include? If so, please tell us what issues you think should be included and why.

Question ENV16: Which Option on page 79 would you prefer Policy QE1 to follow, and why?

Please tick one box Option 1: Environment Led
 Option 2: Development Led
 Option 3: Spatial Strategy

Please provide reasons for your answer.

As with many of the answers above the council view a hybrid of the above options suitable depending on the individual circumstances across the region, although environment led should be the most relevant as option 3 the spatial strategy and option 2 development areas it identifies should stem from full consideration of the environment. If the RSS is to be successful then significant development should not be allowed which don't conform with option 3, which should have been develop with option 1 in mind.

Flood Risk

Question ENV17: Do you agree with the suggested list of issues a – l on page 84 that a new Flood Risk Policy could include?

Please tick one box Yes No

Are there any suggested issues which a new Flood Risk Policy should not include? If so, please tell us why you think these issues should be excluded.

Are there any additional issues which you think a new Flood Risk Policy should include? If so, please tell us what issues you think should be included and why.

Energy

Question ENV18: Do you think that Policy EN2 in the existing WMRSS should be revised to encourage improvements to the energy efficiency of existing buildings as opportunities arise?

Please tick one box Yes No

Please provide reasons for your answer, including any views you may have on how a regional policy on energy efficiency could be implemented.

The council fails to see how the RSS can have an impact on existing buildings especially if there is then no planning application related to the building. The use of words such as encourage also would not add any certainty to the policy and would leave it open to much interpretation and again we would question how it would be genuinely implemented and enforced.

Question ENV19: Which of the Renewable Energy Target Options do you think should be used in the WMRSS to promote the development of renewable energy and low carbon technologies in the West Midlands? (see page 90).

Please tick one box Option 1: Adopt national target for renewable energy
 Option 2: Adopt Regional Energy Strategy targets for renewable energy
 Option 3: Sub-regional targets for renewable energy

Please provide reasons for your answer.

The Council feels setting targets is useful although have no firm view on which one is the most suitable, adopting the national target would offer some consistency nationwide although does to take into account local factors. It is felt that regional and sub regional would be more worthwhile as there is a higher chance that they are actually achievable on the ground. The District Council is and will continue to work with Worcestershire County Council and other colleagues to ensure that targets for renewable energy production identified in the Core Strategy are both worthwhile and also achievable.

Question ENV20: Do you think that the WMRSS should set regional targets for specific renewable energy and low carbon technologies such as biomass, combined heat and power (CHP), ground source heat, landfill gas, solar, wind etc?

Please tick one box Yes No

Please provide reasons for your answer.

The council would be looking for support from other agencies and the sub region to identify the possibility of providing the various technologies in new development across the district. And as such have no firm view on this element at the moment, although if evidence suggests that targets should be included either at a regional, sub regional, or local level in order for the potential of these solutions to be fulfilled the council will look to ensure they are included in any future local planning policies.

Question ENV21: Do you think that the WMRSS should retain the existing Policy EN1 on Energy Generation (Option 1) or should it set out clear regional criteria to assess whether planning applications for renewable energy and low carbon technologies are appropriately located (Option 2)?

Please tick one box Option 1: Retain existing Policy EN1
 Option 2: Criteria-based policy to ensure that renewable energy is appropriately located

Please provide reasons for your answer. If you answered Option 2, please also answer Question ENV22.

Guidance contained in a criteria based policy would set a framework for districts to develop local policies, although careful consideration will need to be given to ensure that the criteria is flexible enough for local circumstances to be taken into account .

Question ENV22: If you think the WMRSS should include clear criteria for assessing applications for renewable energy and low carbon technologies (Option 2 above) please tell us which are the most important factors in assessing where renewable energy and low carbon technologies would be most appropriately located. Please rate each factor on a scale of 0 - 5.

Score (0 is not important, 1 is the least important and 5 is the most important).

Contribution to the global environment

Contribution to the local economy

Impact of fauna, flora and animal life

Noise

Odour

Traffic Implications

Visual Impact

Other factor(s) (please specify below)

All of the above are important although as with many of the responses local circumstance will dictate which ones are most important in particular areas.

Positive Uses of the Green Belt

Question ENV23: Should the WMRSS develop a policy to secure positive use and improvements of the Green Belt and urban fringe (Option 1), or rely on the guidance in national Green Belt policy (PPG2) and the environmental enhancement policies (Option 2), and why?

Please tick one box Option 1: Develop a Regionally Specific Green Belt Policy
 Option 2: Apply PPG2

Please provide reasons (and where possible, evidence) for your answer.

The district councils view is that Green Belt policy is a longstanding and successful one and we see no reason why it should be altered in favour of a more regionally specific one. Any attempt to dissolve the importance of the green belt especially around the urban fringe as the document suggests is something the district council would strongly oppose. As a district which is 91% green belt with the whole of our northern border being on the urban fringe the council sees it plays an essential part in maintaining that the focus of new development remains on the MUA in favour of widespread urban sprawl beyond this, the weakening of green belt policy in these areas could potentially encourage development which may harm the urban renaissance aims of the RSS.

.....

Safeguarding Mineral Resources

Question M1: Which Option on page 103 do you think will provide the most effective means of safeguarding the minerals the Region needs for the future? Please state why you have chosen a particular option and provide any evidence that you have to support your view.

Please tick one box Option 1: Safeguard **Key** Minerals and Infrastructure
 Option 2: Safeguard **All** Minerals and Key Infrastructure

Please provide reasons (and where possible, evidence) for your answer.

No Comment

Question M2: Do you think that the WMRSS should provide for a higher level of policy protection for Etruria Marl through the designation of a specific regional safeguarding area?

Please tick one box Yes No

If yes, please provide reasons for your answer.

No Comment

If no, why do you think a higher level of protection is not required?

Question M3: In relation to issues related to Safeguarding Areas (see page 99), should there be a different approach for safeguarding in rural and urban areas?

Please tick one box Yes No

If yes, what should the approach be for urban and rural areas? Please explain the different approaches you would use and how you think they could be operated in those areas.

No Comment

If no, please give reasons for your views.

Question M4: What should the threshold for development be when consulting on non mineral developments in Minerals Safeguarding Areas (MSAs) / Mineral Consultation Areas (MCAs) An example could be as follows:

Non-Mineral Development in a MCA comprising more than:
5000 sq metres for offices/retail/tourist/leisure/development
2 hectares for any Use Class B1, B2, B8
1 hectare for any residential development

Should the threshold be based on end use or developable areas in hectares? Should it be set at different levels for different minerals? Please provide your views and your reasons for them.

Safeguarding Mineral Resources continued

Question M5: What minerals related infrastructure should be safeguarded in the Region?

These could be for example:

Sites / facilities for concrete batching
the manufacture of coated materials
other concrete products

the handling, processing and distribution of substitute, recycled and secondary aggregate material using local rivers, inland waterways and rail.

Please state your reasons and provide evidence to support your view. Please provide a list of key sites/facilities that should be safeguarded.

No Comment

What mechanisms should be used to safeguard these sites and facilities? For example, defining a buffer zone around each facility/site. Please state your reasons and provide evidence to support your view.

Question M6: Do you think that minerals resources should be safeguarded in areas covered by national designations for landscape, wildlife conservation and cultural heritage?

Please tick one box Minerals resources should be safeguarded in designated areas
 Minerals resources should not be safeguarded in designated areas

Please provide reasons and where possible provide evidence for your answer.

No Comment

Question M7: Is there a need for a regional safeguarding policy on coal? Please provide reasons (and where possible, evidence) to support your view.

Please tick one box Yes No

If yes, what matters should the policy address?

No Comment

Question M8: In updating Policy M4 (Energy Minerals) in the existing WMRSS is there a

need to place more emphasis on realising the opportunities available from existing technologies to release energy sources from worked and unworked coal seams in the coalfields of the West Midlands? Are there any other matters which an updated Policy M4 should address?

Please tick one box Yes No

If yes, please explain (and where possible, provide evidence) to support your view.

No Comment

.....
If no, please explain (and where possible, provide evidence) to support your view.

.....
Are there any other matters which an updated Policy M4 should address?

.....

Future Supplies of Construction Aggregates

Question M9: Do you think that the indicative apportionment outlined in Table 4 on page 106 is realistic?

Please tick one box Yes No

Please provide reasons (and where possible, evidence) for your answer.

No Comment

Question M10: Which of the three Options on page 109 do you think would provide both an adequate and sustainable supply of aggregates up to 2026 in the West Midlands?

Please tick one box Option 1: Apportion future supplies by existing methods
 Option 2: Apportion future supplies using different sub regions
 Option 3: Apportion future supplies using different sub regions and methods

Please provide reasons (and where possible, evidence) for your answer.

No Comment

Question M11: In relation to the contribution of alternate materials to future supply (see page 108), what additional policy guidance set out in Policy M3 (The Use of Alternative Sources of Materials) of the WMRSS is required to reduce the reliance on aggregates and increase the use of alternate materials in construction?

Do you have any suggestions for additional regional policies/guidance that could reduce the reliance on aggregates and increase the use of alternate materials in construction?

No Comment

Question M12: Do you think that the provision of future supplies of aggregates in the Region can be determined by applying one or more of the following policies, provisions or concepts? Please tick the relevant boxes and give reasons for your choices.

- Future Patterns of Housing and Employment growth
- Existing Mineral Infrastructure
- Local Resource Availability
- Environmental Acceptability and Designations

- None of the above
- Other (please specify)

Please provide reasons (and where possible, evidence) for your answer.

No Comment

Question M13: Do you agree with the Section 4(4) Authorities that the sub regions set out on page 106 are the most appropriate for carrying out any future sub regional apportionment of aggregates in the West Midlands?

Please tick one box Existing Sub-Regions Sub-Regions Proposed by Section 4(4) Authorities

Please provide reasons for your answer.

No Comment

Future Brick Clay Provision

Question M14: What policies do you think would best ensure that separate long term off site stockpiling of Etruria Marl and fireclays can be provided in the Region?

Do you have any suggestions for policies to ensure that separate long term off site stockpiling of Etruria Marl and fireclays can be provided in the Region?

No Comment

Question M15: Which of the Options for meeting the shortfall in Brick Clay supplies (see page 117) would provide the most sustainable way of meeting the industry's future needs?

Please tick one box Option 1: Regional Supply Requirement
 Option 2: Supplies for Individual Brickworks
 Option 3: Future Supplies from Resource Areas

Please provide reasons for your answer.

No Comment

Question M16: Do you think that the 13 million tonnes shortfall in clay supplies could be met from quarries within the Region?

Please tick one box Yes No

Please provide reasons (and where possible, evidence) for your answer.

No Comment

Question M17: What planning and environmental criteria should be used to identify broad locations for the development of long term off-site stockpiles of clays (including fireclays)? Please provide reasons to support your views.

Suggested Planning and Environmental Criteria To Identify Broad Locations For

Stockpiles Of Clays (Including Fireclays)

- Proximity to brick clay supplies
- Proximity to existing brickworks
- Good access to road/rail
- Proximity to existing/future markets
- Long term accessibility
- Locations where it is possible to minimise/avoid significant environmental impacts
- Other (please specify)

Please provide reasons (and where possible, evidence) to support your views.

No Comment

Please send your completed questionnaire by post to:

WMRSS Phase Three Revision

West Midlands Regional Assembly
Regional Partnership Centre
Albert House
Quay Place
92-93 Edward Street
Birmingham
B1 2RA

Or by fax: 0121 245 0201

Or by email: wmrss@wmra.gov.uk

(Electronic copies of the questionnaire can be downloaded from www.wmra.gov.uk)

Or complete online: www.wmra.gov.uk

(visit the Assembly's homepage for more details).

All submissions must be received by 14th August 2009

Any questions relating to the WMRSS Phase Three Consultation should be directed to the WMRSS Team at West Midlands Regional Assembly on **0121 678 1010** or **wmrss@wmra.gov.uk**