BROMSGROVE DISTRICT COUNCIL

Local Development Framework Working Party

10th October 2007

Regional Spatial Strategy Phase 2 Revision Implications

Responsible Portfolio Holder	Cllr J Dyer
Responsible Head of Service	Dave Hammond

1. SUMMARY

1.1 This Report summarises the preferred option of the Phase 2 revision of the Regional Spatial Strategy (RSS) and identifies the main implications for the district of Bromsgrove.

2. **RECOMMENDATION**

2.1 Bromsgrove District Council formally endorse at the Regional Planning Partnership the current draft preferred options of the RSS phase 2 revision, with the exception of policy T12 which identifies the Longbridge Link road as priority for investment.

3. BACKGROUND

3.1 The Regional Spatial Strategy was published in June 2004. At that time, the Secretary of State supported the principles of the strategy but suggested several issues that needed to be developed further. The Revision process is being undertaken by the West Midlands Regional Assembly (WMRA) in three phases.

Phase 1 - the Black Country study, this phase is currently undergoing its final round of changes before formal adoption.

Phase 2 - Covers housing figures, employment land, town and city centres, transport, and waste, this phase is nearing submission and is the focus of this report.

Phase 3 - covers critical rural services, culture/recreational provision, various regionally significant environmental issues and the provision of a framework for Gypsy and Traveller sites, and will be launched autumn 2007.

3.2 Members will recall that at the Local Development Framework Working party of the 28th March 2007 a paper was presented outlining an officer's response to the Spatial options for the RSS Phase 2 revision. Since then comments received from councils and stakeholders across the whole of the West Midlands region have been considered and a preferred option prepared. The preferred option is to be considered by the regional planning partnership at their meeting on the 22nd October, a full version of the draft phase 2 preferred option is attached as appendix 1.

3.3 As detailed above the Phase 2 focuses on the housing figures, employment land, town and city centres, transport, and waste elements of the RSS currently under the headings Communities for the future, Prosperity for all, Quality of the Environment, and Transport and Accessibility. Below is a brief summary of the each element being revised and its potential implications for Bromsgrove.

3.4 **Communities for the Future (Housing Allocations)**

Perhaps the most significant of all the strategies contained within the current RSS is that of reversing the trend of decentralisation, previous strategies had encouraged out migration from the Major Urban Areas (MUA) which in this instance is the Birmingham and Black Country conurbation, into the surrounding towns and cities. The RSS intends to reverse this trend and focus substantial development on the MUA and some of the larger more sustainable settlements in the West Midlands region.

- 3.5 The communities for the future chapter of the RSS determines the level and distribution of housing development up to 2026, also the phasing of this development, and the levels of affordable housing to be provided. This level and distribution of housing development is central to the RSS and will influence many other policy areas, such as employment land provision and infrastructure development.
- 3.6 The response provided from the local authorities around the region supported development for around 340,000 dwellings in the period up to 2026 which is 42,000 dwellings short of 382,000 estimated demand for dwellings up to the same period, this estimation is based on officers advice and the 2004 based household projections. These figures have constantly been challenged from both those who think the numbers are too low (house builders) and don't take into account the increase in people owning second homes, and those with environmental interests who would like to see the figure reduced. Further work commissioned by Advantage West Midlands which looks into the interrelationships between housing and economic growth puts the estimate requirement higher between 374,000 and 389,000. Clearly this evidence shows that it is impossible to predict accurately the level of residential development required in the region up to 2026.
- 3.7 Included within this overall provision is a requirement for affordable housing, work carried out by Cambridge University identifies a potential requirement for approximately 9700 new affordable units per annum. Of this overall requirement 6200pa are to respond to demographic changes and replacing right to buy properties leaving the current stock of affordable housing, and a further 3500 to replace demolished stock. Recent estimates suggest the likely amount of affordable units developed is in the region of 5300pa obviously this is a significant shortfall between required and the actual.
- 3.8 This level of development whether it is too much, or not enough will obviously have huge implications for the region, especially in relation to the level of infrastructure required to support it. It has been identified that there are no 'showstoppers' but in some areas the infrastructure has been identified as a constraint on housing growth. One of the other key implications is the effect

this amount of development will have on sustainability and climate change, currently this has been identified in the accompanying Sustainability Appraisal (SA) of the preferred option although it is unclear exactly what the impact is likely to be. The preferred option of the RSS revision does now include policies which outline how local authorities should be introducing strategies in their LDFs which attempt to reduce C02 emissions, mitigate the effects of, and to adapt to the worst impacts of climate change.

3.9 Whilst all the figures above are looking at the West Midlands as a whole the Preferred option also includes some more detailed policies which interpret these figures down to district level. The most significant figures contained in the RSS for Bromsgrove are the levels of development required in Bromsgrove and Redditch districts up to 2026.

Planning Area	Proposal Total (Net)	Indicative annual average
Birmingham	2006 - 2026	2006 - 2026
	50,600	2,530
Coventry++++	33,500	1,675
Black Country	61,200	3,060
Solihull	7,600	380
Metropolitan Area Total	152,900	7,645
Shropshire	25,700	1,285
Bridgnorth	2,500	125
North Shropshire	6,100	305
Oswestry	4,000	200
Shrewsbury & Atcham	8,200	410
of which Shrewsbury	6,200	310
South Shropshire	4,900	245
Telford & Wrekin	26,500	1,325
of which Telford	24,000	1,200
Staffordshire	54,900	2,745
Cannock Chase	5,800	290
East Staffordshire	12,900	645
of which Burton upon Trent	12,000	600
Lichfield	8,000	400
Newcastle-under-Lyme	5,700	285
of which Newcastle urban area	4,600	230
South Staffordshire	3,500	175
Stafford	10,100	505
of which Stafford town	7,000	350
Staffordshire Moorlands	6,000	300
Tamworth	2,900	145
Stoke on Trent	8,400	420
Warwickshire	41,000	2,050
North Warwickshire	3,000	150
Nuneaton and Bedworth	10,800	540
Rugby	10,800	540
of which Rugby town	9,800	490
Stratford-on-Avon	5,600	280
Warwick	10,800	540

Worcestershire	36,600	1,830
Bromsgrove)	2,100	105
Redditch††)	6,600	330
of which in & around Redditch town	6,600	330
Malvern Hills*	4,900	245
Worcester City+++*	10,500	525
Wychavon*	9,100	455
Wyre Forest	3,400	170
Herefordshire	16,600	830
of which Hereford City	8,300	415
Shire and Unitary Authorities Total	209,700	10,485
Major Urban Areas†	165,900	8,295
Other Areas	196,700	9,835
West Midlands Region	362,600	18,130

Includes the Newcastle urban area

†† Redditch Figure of 6,600 includes 3,300 in Redditch and 3,300 adjacent to Redditch town Bromsgrove or Stratford upon Avon Districts

+++ Of the figure of 10,500 for Worcester; 3,200 will be within Worcester City and 7,300 will be adjacent to the City within the surrounding Malvern Hills and or Wychavon

- 3.10 As can be seen above the figure for Bromsgrove, 2100 dwellings in the period up to 2026, is considerably less than the majority of districts around the West Midlands, this figure is based on not only the 2004 household projections but also takes into account the overall policy stance of reversing the trend of decentralisation, the amount of available brownfield sites and previous completions within the district.
- 3.11 Bromsgrove as an authority on the periphery of a MUA, with a designated green belt covering 91% of the district is an area where growth is to be restricted if the overall policy aims are to be met. Previously Bromsgrove has taken considerable amounts of out migration from the MUA accounting for the current over provision and subsequent moratorium. This over provision has now been factored into the new figure, this level of development is the level identified as spatial option 2 during the first round of consultation which took place in the early months of 2007.
- 3.12 Local and sub-regional housing needs surveys indicate that the level of affordable housing required in the district up to 2026 is likely to be considerably more than the 2100 housing allocation can provide for. Clearly if this is the case then this level of development would not allow the district to meet its affordable housing needs over the plan period, a factor which is common to the vast majority of districts throughout the region and all districts in Worcestershire. The region acknowledges that in order to tackle affordable housing issues and plan for future households needs, an increased requirement above the current RSS (June 2004) is necessary. It also believes that a significant increase in overall provision could introduce new issues, as stated in their report to the regional planning partnership on the draft preferred option (extract below).

'the overprovision of housing would be a significant risk to the Region, higher housing provision would:'

• impact negatively upon the existing housing stock and the regeneration of the MUAs by increasing relative demand for new housing located within ex-urban locations

• lead to increased provision outside the MUAs, which would in turn encourage selective outward migration from the MUAs;

• continue the downward spiral of polarised housing markets and undermine social cohesion across the Region;

• lead to increased allocation for greenfield sites which will in turn impact upon the development of brownfield sites and the Region's ability to hit Brownfield land development targets;

• undermine the sustainable development principles underpinning the current RSS Strategy.

- 3.13 The above table not only identifies the level of residential development required for Bromsgrove but also the development needs for Redditch. Members will recall that the original spatial options consultation identified that Redditch would be allocated 8200 or 13200 under options 2 and 3 respectively, it was also indicated that should Redditch be allocated these levels of housing then development may have to take place in neighbouring Districts. This prompted the authorities implicated Bromsgrove, Redditch, and Stratford and their accompanying sub regional authorities, Worcestershire and Warwickshire to commission a study to assess the implications of these levels of growth around Redditch. This was an approach supported and part funded by the WMRA. At the time of writing this report, the study had yet to be finalised. (A verbal update on the draft findings of this report will be provided at the working group meeting)
- 3.14 Redditch has also been allocated the option 2 figure which has also been reduced to take into account more recent evidence, alongside this Redditch has also be identified as a Settlement of Significant Development (SSD). This designation means it is judged to be a town capable of balanced and sustainable growth either within its current boundaries or in adjacent areas. (for full details of this policy please see Appendix 1 policy CF2) Redditch's current figure is 6600 of which 3300 is to be met adjacent to the existing urban area in the districts of Bromsgrove and Stratford. The actual location of where this housing is to be provided will be informed by the core strategies the three districts are currently producing. Any development identified in either of the surrounding districts is unlikely to be required until towards the end of the plan period, although it will require the release of substantial green belt land.

3.15 The main implications of these allocations for Bromsgrove District are;

1. Levels of residential development will be reduced from previous building rates in order to help meet the overall policy objectives of the RSS, this does mean that house prices are likely to remain high, and the currently policy of restraint will have to continue.

2. The level of development identified for Bromsgrove could largely be met on brownfield sites reducing the amount of Greenfield land needed to be released in and around Bromsgrove town and the other larger settlements within the district. This type of development is more sustainable than Greenfield release and probably more achievable as it does not require substantial levels of infrastructure provision.

3. The affordable housing needs of Bromsgrove will not be met within the confines of the district, restricting the ability to rebalance the housing market.

4. Accommodating Redditch growth adjacent to the existing settlement in Bromsgrove will require green belt release, and significant new infrastructure provision. Development of this type will also narrow the strategic gap between The MUA and Redditch and also Bromsgrove and Redditch.

5. Housing which partially meets the needs of the MUA will be provided at Longbridge, although this will not count as part of the Bromsgrove allocation.

3.16 **Prosperity for All (Employment Land Provision)**

The levels of housing growth being put forward for the region cannot be developed in isolation. The Prosperity for All chapter of the RSS is concerned with the economic development of the region and as such puts forward levels of employment land which districts must deliver over the plan period. The table below shows the most recent figures regarding the levels of employment land being proposed across the region.

District	Five-year reservoir (ha)	Indicative long-term requirements (ha)
Birmingham*	130	390
Black Country*	185	555
Coventry* 🔶	70 ^ψ	210
Solihull*	15	45
Metropolitan Area	400	1200
Telford & Wrekin	50	150
Herefordshire	37	111
Stoke-on-Trent*	55	165
Bridgnorth	6	18
North Shropshire	22	66
Oswestry	8	24
Shrewsbury & Atcham	28	84
South Shropshire	8	24
Shropshire	72	216
Cannock Chase	28	84
East Staffordshire	50	150
Lichfield	33	99
Newcastle*	28	84
South Staffordshire	8	24
Stafford	40	120

Staffordshire	6	18
Moorlands		
Tamworth	14	42
Staffordshire	207	621
North Warwickshire	30	90
Nuneaton &	32	96
Bedworth 🔶		
Rugby 🔶	36	108
Stratford ◆	22	66
Warwick 🔶	25	75
Warwickshire	145	435
Bromsgrove 🔶	7	21
Malvern Hills 🔶	11	33
Redditch 🔶	17 (of which 8 ha will be	51 (of which 24 ha will be provided
	provided within Bromsgrove /	within Bromsgrove / Stratford)
	Stratford)	
Worcester 🔶	27 (of which 9 ha will be	81 (of which 27 ha will be provided
	provided within Malvern and	within Malvern and Wychavon, the
	Wychavon, the balance to be	balance to be determined by a joint
	determined by a joint Core	Core Strategy)
	Strategy)	
Wychavon 🔶	23	69
Wyre Forest	11	33
Worcestershire	96	288
MUA	483	1449 (45%)
Non-MUA	579	1737 (55%)
Region	1062	3186

Footnotes:

The amounts of employment land in this table do not include RIS (Policy PA7), MIS (PA8) and RLS (PA9).

* in these districts the five year reservoir is to be regarded as a minima.

♦ in these districts cross- boundary discussions will be required.

^{Ψ} There is unlikely to be sufficient land within Coventry to meet employment land requirements over the plan period. Sub-regional discussions will be required between, Coventry CC, Rugby BC, Nuneation & Bedworth DC and Warwick DC to ensure continuity of supply. Any economic development at the site of the former Peugeot Assembly plant should be counted as meeting the needs of Coventry.

- 3.17 There is no universally recognised way of assessing employment land requirements and historically many different approaches have been applied. The Worcestershire county structure plan adopted the approach of 1 hectare of employment land for every 70 new dwellings being proposed. The Regional assembly has adopted a different approach to arriving at the figures above based on providing a 5 year reservoir of land, and then an indicative requirement over a 15 year period. The methodology behind this approach is unclear at the moment.
- 3.18 The figure for Bromsgrove is currently 7 hectares to be provided initially for the first 5 years and beyond this a further 21 hectares for the following 15. Whilst the exact reasoning behind this figure is unclear, it is a figure which seems to be much more in keeping with the previous Worcestershire methodology, and the overall aims of the RSS. These revised figures are considerably lower

than those previously published which indicated allocating closer to 100 hectares of employment land to Bromsgrove. These targets are currently only indicative and the actual requirement may change as work progresses on the Bromsgrove LDF. Bromsgrove currently has a number of employment sites such as the Technology Park which could play a significant part in this provision.

3.19 Similarly to the housing provision some of Redditch's employment needs may have to be met outside of it own boundaries in Bromsgrove or Stratford. The preferred option identifies at least 8 Ha of employment land to be provided in the adjoining districts as a 5 year reservoir, and beyond that potentially 24 ha to be provided in the following years. Any allocation of this type will be as has been done under the Bromsgrove District Local Plan where 30ha of employment land in the form of the Ravensbank Business Park was designated in Bromsgrove for the employment needs of Redditch.

3.20 The main implication of these figures for Bromsgrove District are;

1. Reduced levels of employment land to mirror reduced levels of housing figures will contribute to the overall aims of the RSS, whilst allowing some employment development in the surrounding districts, such as Bromsgrove.

2. Smaller long term indicative amounts being identified for the district reduce the likelihood of significant Greenfield release for new employment sites in and around Bromsgrove town and the other larger settlements in the district, and concentrate development on existing sites.

3. Any employment allocation to cater for Redditch's need adjacent to the current settlement would required Green Belt release, and infrastructure development, as well and narrowing the strategic gaps between the MUA Redditch and Bromsgrove.

3.21 **Prosperity for All (Town and City Centres)**

The revised sections of the RSS covering Town and City centres has meant a new hierarchy of strategic centres to reflect more up to date evidence. Bromsgrove is not identified as strategic centre. Twenty five centres have been identified including Birmingham, Solihull, Worcester, Stratford, Kidderminster, and Redditch these centres are to be the preferred location for major new retail developments, uses that attract large numbers of people for cultural / social activities, and also for large scale office developments.

3.22 The fact that Bromsgrove is not a strategic centre does not preclude development taking place, in fact the policy identifies that there are many other centres in the region which should develop policies to cater for their own needs, such as the Area Action Plan (AAP) currently being prepared for Bromsgrove Town Centre.

3.23 Transport

Many of the policies on transport remain unchanged; one potentially significant alteration is the identification of Bromsgrove as a potential site for a park and ride site. This policy change is to reflect the current work being done to provide a new train station in Bromsgrove. More detailed work will need to be carried out in order to assess the potential impacts on the strategic and local road networks if the new station is to cater for these types of journeys. Longbridge has also been identified as another potential location, the AAP currently being prepared with Birmingham City Council and Worcestershire County Council is looking into the possibility providing Park and Ride.

3.24 Policy T12 Priorities for investment identifies a number of regionally significant transport measures which are needed to support the delivery of the overall aims of the RSS. One of these identified measures is the Longbridge link road, the development of the AAP for the Longbridge sites has provided evidence which proves this link road is not needed to support the current levels of development being proposed. The current AAP will not be recommending a link road and therefore reference to it should be removed from the RSS.

3.25 Waste

As Bromsgrove is not a waste planning authority many of the policies in this section require Worcestershire County Council to directly address them, although this is not to say that there are no effects for Bromsgrove. The County Council will have to identify enough land within Worcestershire to manage the tonnage of waste arising within its boundaries. Due to the amount of development that has taken place over recent years, and the likely new development in the district it is very possible that land in Bromsgrove will be required for this use.

3.26 Worcestershire has been identified as having a 'Treatment Gap' i.e. not enough facilities to manage the amount of waste generated, as such Policy W3 states that MUAs, SSDs, and other major settlements should be the location for regional or sub regional facilities to reprocess, re-use, recycle or recover value from waste. Bromsgrove along with many other settlements including Worcester, Droitwich, Kidderminster and Redditch have been identified as possible locations.

3.27 Next Steps

The final version of the phase 2 revision will be presented to the Regional Planning partnership on the 22nd of October, where members will be asked to sign it off for submission to the Secretary of State. As well as the Preferred Option document, the submission will be accompanied with the following supporting reports.

- RSS Phase 2 Preferred Option Implementation Plan
- RSS Phase 2 Preferred Option Sustainability Appraisal
- Statement of Public Participation
- RSS Phase 2 Technical Work
- RSS Phase 2 Overview and Housing Technical Papers
- 3.27 Upon submission to the Secretary of State, there will follow a 12 week formal consultation. All representations will be made to the Panel Secretary appointed by Government to oversee the Examination in Public, which is likely to take place in autumn 2008. WMRA will submit a letter to every local authority, Regional Partnerships and Stakeholders groups as well as its consultation database, to inform them of the consultation process and where

copies of the submission documents can be viewed. Copies of the submission documents will be made available on the WMRA website, Local Planning Authorities and Main libraries across the Region.

4. **FINANCIAL IMPLICATIONS**

4.1 Whilst their are no direct implications of endorsing the preferred option of the RSS, the levels of income generated over longer periods could be affected as the levels of development required will reduce the number of planning applications where compared with previous numbers.

5. **LEGAL IMPLICATIONS**

5.1 The RSS is the responsibility of the West Midlands Regional Assembly and is being prepared under the regulations of the Planning and Compulsory Purchase Act 2004.

6. **COUNCIL OBJECTIVES**

6.1 The ability of the council to deliver its objectives is affected by the status of the Local Development Framework (LDF). All documents produced as part of the LDF have to be in general conformity with the RSS, therefore the RSS will ultimately impact on these objectives and priorities the table below indicates potential impacts.

Council Objective (CO)	Council Priorities (CP)	Impacts
Regeneration (CO1)	A thriving market town (CP1)	Policies in the RSS support the development of centres across the region, including those not specifically named as major urban areas or, settlements of significant development, the ability to regenerate the town are not adversely effected by policies in the RSS
Improvement (CO2)	Customer service (CP2)	No impact
Sense of Community and Well Being (CO3)	Sense of community (CP3)	The RSS gives a strategic framework for planning across the region. Plans at a more local level can then create planning policies that provide developments which can enhance the

		sense of community and well being.
Environment (CO4)	Housing (CP4)	The RSS guides the levels and distribution of housing development across the region. The ability of Bromsgrove to satisfy all of its affordable housing needs are significantly reduced by this emerging policy of housing restraint in districts which are not major urban areas or, settlements of significant development.
	Clean streets and recycling (CP5)	In the Long term the RSS could help provide more waste management facilities in the district.

7. RISK MANAGEMENT

- 7.1 The main risks associated with the details included in this report are:
 - Uncertainty for the future development of the district
 - Lack of provision of affordable housing
- 7.2 These risks are being managed as follows:
 - Uncertainty for the future development of the district

Risk Register: Planning and Environment Key Objective Ref No: 3 Key Objective: implement a Local Development Framework

The ability of officers to prepare the Core strategy and other LDF documents could be affected if members create uncertainty by rejecting the policies of the Regional Spatial Strategy revision. The LDF has to be in general conformity with the RSS, if polices contained within it are rejected by Bromsgrove District Council the preparation of the LDF will become difficult, as officers will be forced to make a plan which will eventually found to be unsound by the planning inspectorate.

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

• Lack of provision of affordable housing

Risk Register: Planning and Environment Key Objective Ref No: 2 Key Objective: Prevent Homelessness and provide affordable housing

8. CUSTOMER IMPLICATIONS

8.1 Endorsing the RSS at this stage will have no immediate direct implications to the council's customers.

9. EQUALITIES AND DIVERSITY IMPLICATIONS

9.1 The current review of the RSS is focussed on spatial planning at a strategic level and as such has no equalities and diversity.

10. OTHER IMPLICATIONS

Procurement Issues	None
Personnel Implications	None
Governance/Performance Management	None
Community Safety including Section 17 of Crime and Disorder Act 1998	None
Policy	The policy decisions taken at a regional level directly effect the ability to generate local policies especially in relation to planning
Environmental	As stated above their will be implications to the environment over a long period of time, the exact effects are currently unknown.

11. OTHERS CONSULTED ON THE REPORT

Portfolio Holder	Yes
Chief Executive	Yes
Corporate Director (Services)	Yes
Assistant Chief Executive	Yes
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

12. APPENDICES

Appendix 1 Draft Preferred option of the phase 2 revision of the Regional Spatial Strategy

13. BACKGROUND PAPERS

None

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