

## **BROMSGROVE DISTRICT COUNCIL**

### **Housing Growth Consultation Cabinet**

**6<sup>th</sup> February**

#### **Redditch Growth Consultation**

Relevant Portfolio Holder	Cllr Kit Taylor
Portfolio Holder Consulted	Yes
Relevant Head of Service	Ruth Bamford
Ward(s) Affected	Tardebigge and Alvechurch
Ward Councillor(s) Consulted	Yes
Key Decision / Non-Key Decision	Non Key Decision

#### **1. SUMMARY OF PROPOSALS**

This report seeks approval for consultation to be carried out between 25<sup>th</sup> February 2013 and the 8<sup>th</sup> April 2013 on proposed Housing Growth. The consultation would be held jointly by Redditch Borough Council and Bromsgrove District Council.

The Housing Growth consultation Leaflet (Appendix 1) presents the two Council's chosen option for growth adjacent to Redditch Borough but within Bromsgrove District, to meet the objectively assessed development needs of Redditch until 2030.

#### **2. RECOMMENDATIONS**

**The Committee is asked to RECOMMEND that**

**The consultation document, Housing Growth Consultation (Appendix 1) and the supporting background evidence report (Appendix 2) and the accompanying Sustainability Appraisal (Appendix 3) are approved for public consultation jointly between 25<sup>th</sup> February 2013 and 8th April 2013.**

#### **3. KEY ISSUES**

##### **Financial Implications**

- 3.1 The final stage costs of preparing and taking through examination the Bromsgrove District Plan which will include cross boundary housing policies will be partly met through reserve budgets for 2013/14 and will be subject to additional budget bids for 2013/14 and 2014/2015; however costs associated with consultation processes can be covered by existing Strategic Planning budgets.

##### **Legal Implications**

- 3.2 The Local Plan has been prepared under the provisions of the Planning and Compulsory Purchase Act 2004 and the Town & Country Planning Act 2004 (as amended 2008). The preparation work has also included a combined

Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA) to consider the environmental, social and economic impact of the Plans Vision, Objectives and Policies or the growth options. These assessments consider whether the chosen option is sustainable and where any potential impacts are identified, how or if they can be mitigated against. A separate SA for the cross boundary growth work is attached as Appendix 3.

- 3.3 This housing growth consultation is essential for the two Councils to be able to progress their Local and District Plans. The 'Duty to Co-operate' is a legal obligation, introduced by the Localism Act (2011) which requires local authorities to co-operate with each other in relation to planning for sustainable development, in particular the preparation of development plan documents relating to a strategic matter.

**Service / Operational Implications**

- 3.4 The NPPF requires that Councils use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. That need for Redditch's housing has been established through the Strategic Housing Market Assessment Main Report and Strategic Housing Market Assessment Redditch Overview.
- 3.5 The SHMA was prepared to assess Worcestershire housing need for the six separate authorities. This SHMA suggested that Redditch should provide between 5,120 and 8,620 dwellings. It also suggested that further work be undertaken to provide specific requirements. This work was completed and it suggested that the housing requirement for Redditch to 2030 is 6,380 dwellings.
- 3.6 Each Local Authority is required to produce a document which sets out land that is available for housing called the Strategic Housing Land Availability Assessment (SHLAA). Within Redditch the SHLAA demonstrates that there is capacity to accommodate around 3,000 dwellings within Redditch's own boundaries. This leaves 3,400 dwellings to be found cross boundary. The SHLAA also sets out when it is likely that these sites will come forward for development. Based on information received from developers and landowners it is likely that some of these sites are not capable of coming forward for development immediately and therefore cannot contribute to the five year supply of housing land.
- 3.7 A five-year housing land supply is required by each local authority to demonstrate they can deliver housing within their area. Based on the housing requirement being 6,380 (as proposed by the SHMA) Redditch cannot demonstrate a five year housing land supply using land within its own boundaries only. Therefore land is needed within Bromsgrove to ensure Redditch can deliver housing immediately. In order to ensure that developments do not occur in unsustainable and inappropriate locations both authorities need to identify sites

in Bromsgrove to accommodate the cross-boundary housing requirements in the most appropriate and sustainable locations.

- 3.8 Officers are seeking to implement housing delivery within Redditch Borough on sites which don't currently contribute towards the five year housing land supply. The focus on maximising delivery of housing within Redditch Boundaries is a consistent approach and will continue to be recommended.
- 3.9 The West Midlands Regional Spatial Strategy (RSS) Panel Report was released in 2009 and set out clearly that Redditch Borough does not have sufficient development land within its boundary to meet locally generated needs. The report proposed a housing requirement of 7,000 dwellings to meet Redditch need and concluded that provision should be made in Redditch to accommodate 4,000 dwellings. Thus, 3,000 should be accommodated in Bromsgrove District. The Report supported the notion to retain flexibility as to where the provision should be made on the edge of Redditch, to be locally determined through the authorities working together. There has been an indication that the RSS will be revoked (as detailed in the Localism Act) however at present the RSS is still a material planning consideration where preparing Local Plans. In anticipation of the RSS being revoked Redditch and Bromsgrove (along with other Worcestershire Districts) commissioned the SHMA as the local evidence to determine the appropriate level of housing for the authorities.
- 3.10 Appendix 2 was completed in house by officers of both Bromsgrove and Redditch. This report follows consultation in 2010 on housing growth between the two Councils, where broad location options for potential growth were identified. Since then no preferred area for growth has been selected until now. The document was required to be able to identify the most sustainable growth location(s) with more detailed evidence than the Councils have previously had.
- 3.11 Early in the production of the document, the Council's reviewed any relevant policy documentation, then agreed on some common strategic objectives which are consistent with the two Council's emerging Plan's objectives. Then a set of site assessment principles were developed to drive the assessment process as a means of evaluating all the options for growth. A number of site visits were undertaken throughout the assessment process.
- 3.12 The broad site appraisal stage set out appraising the issues with twenty of the potential sites around Redditch against the site assessment principles. Sites were either discounted or taken forward (to focussed site appraisal) for further assessment and this process is clearly documented in Chapter 6.
- 3.13 Five areas were taken forward for focussed site appraisal stage the outcome are that area 4 at Foxlydiate and area 6 at Brockhill East were determined at this stage to be the most suitable option.

- 3.14 The background report explains in detail the process employed to assess each area's performance against site assessment criteria. In order to reach the recommendation on the preferred sites all the planning issues must be considered in order to reach a conclusion. All of the areas are in the Green Belt and all of the areas have constraints and strengths. No area is perfect or ideal. The choice that has to be made therefore is on the basis of the areas which most sustainably deliver the required amount of development and associated infrastructure with the least negative impacts. It must be stressed that the proposal has been selected on the basis of information that is currently available and this may alter as a result of the consultation process or as new evidence emerges.
- 3.15 As can be seen from the conclusions for each particular area in the focussed site appraisal stage it is apparent that some areas perform better than others when tested against the varied assessment criteria. Clearly there are competing issues which are more difficult to resolve for some sites than for others. Some selected examples of issues are discussed below although it must be stressed that these alone do not demonstrate why a site has or hasn't been considered suitable.
- 3.16 The development of area 4 (site 1 on the consultation leaflet) has the advantage of improving facilities and services in the wider Webheath area. Whilst lying furthest from the Town centre of all the areas it offers the opportunity to extend existing bus services and by the provision of facilities on site has the potential to reduce the need to travel. Whilst it does not have overall strong defensible Green Belt boundaries on all sides the effects of sprawl, coalescence and encroachment can be mitigated more successfully than some other site options.
- 3.17 It could be argued that areas 4 and 5 perform best in transport terms as their development is likely to have the added benefit of contributing towards the regeneration of both Town Centres. However this must be weighed against the potential negative impact on the setting of Hewell Grange grade II\* listed registered historic park and garden (in relation to area 5 only) which is difficult to mitigate. Furthermore in terms of public transport it would be possible to improve/extend existing public transport services serving areas 4 and 5 whereas area 8 would need new bespoke public transport service which is likely to be very costly and undesirable for bus operators to run until development is completed many years in the future.
- 3.18 Area 6 (Site 2 in the consultation leaflet) has the potential to integrate well into the existing urban fabric of Redditch. It has the easiest access of all the area to the Town centre and the facilities offered there including a range of retail services and the train/bus station providing access to the wider area. It is well served by existing bus routes and has employment close by. The impact on the highway network is more likely to lead to an even distribution throughout the strategic and local road networks. A strong defensible Green Belt boundary is attainable. There are no SSSI's or SWS's on this site and the impact on trees and woodland

would be minimal. Whilst the site lies in an area of high landscape sensitivity it is considered that by avoidance of development on high slopes new housing can be contained within the topography.

- 3.19 All areas are of high landscape sensitivity apart from area 8 which has medium sensitivity. However as area 8 is an exposed site with no natural or physical boundaries which allow for containment, this exposed location further creates difficulties with integration into the existing built form of Redditch. It is considered development here could represent more of a visual intrusion, and the creation of an unsustainable isolated community on the periphery of the town. It is also considered development at area 8 would further exacerbate the unsustainable north /south commuting patterns between Redditch and Birmingham.
- 3.20 There are clearly some areas which have obviously less constraints than others for instance area 6. However the estimated capacity of area 6 alone (672 dwellings) is insufficient to meet the level of new development required. As a result it is considered that site 4 would also be required, this site has an estimated capacity of 2830 dwellings which in total would give an overall development capacity of around 3502 dwellings under this proposal.

#### **Customer / Equalities and Diversity Implications**

- 3.21 To engage with customers effectively a number of consultation events have been organised including 5 full day drop in sessions, including events in a vacant Kingfisher Shopping Centre unit, Foxlydiate Arms public house and Alvechurch Village Hall, it is also hoped to send a leaflet advertising the consultation alongside March's Council Tax letters in both Local Authority areas.

#### **4. RISK MANAGEMENT**

- 4.1 In accordance with both authorities previously approved Local Development Schemes the next stage of the Local/District Plan, subject to amendments following consultation, is Pre-Submission Local/District Plan due August 2013. Following that, the Local/District Plan will be submitted to the Planning Inspectorate for Examination due November/December 2013. Thereafter, a formal Examination in Public will be held, and possibly joint hearing sessions for Redditch growth. If the Local/District Plan is found sound by the Planning Inspector, the Plans can be adopted by the two Councils.
- 4.2 There is a risk that the plans of the neighbouring authorities such as Birmingham or Stratford on Avon District are not found sound at examination for a variety of reasons. This could risk the soundness of the Redditch Local Plan or the Bromsgrove District Plan. Also neighbouring authorities could object to any of the

proposals within Redditch or Bromsgrove which could cause delay or issues of compliance with the duty to cooperate.

- 4.3 Similarly there is a risk that the Redditch or Bromsgrove Plans are found to be unsound at Examination-in-Public. This can be mitigated against to some extent by ensuring that Council's case is clearly articulated through the public consultation stages, and that evidence supports the proposals.
- 4.4 There is always a risk that residents, stakeholders and/or developers will not support the consultation or the findings of the housing growth consultation. This can be mitigated against to some extent by ensuring adequate explanation and justification for the proposals are provided at the public consultation stage and in the response report following consultation.

**5. APPENDICES**

Appendix 1 - Housing growth consultation document

Appendix 2 - Housing growth consultation background report

Appendix 3 - Housing growth consultation draft Sustainability Appraisal

**6. BACKGROUND PAPERS**

All supporting technical evidence will be available on a specific websites at [www.bromsgroveandredditchplanning.co.uk](http://www.bromsgroveandredditchplanning.co.uk)

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