

**BROMSGROVE DISTRICT COUNCIL**

**LOCAL DEVELOPMENT FRAMEWORK WORKING PARTY**

**13<sup>TH</sup> DECEMBER 2007**

**REGIONAL SPATIAL STRATEGY PHASE 2 PREFERRED OPTION SUBMISSION**

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

**1. SUMMARY**

- 1.1 This Report updates members on the current status of the revised Regional Spatial Strategy, the consultation exercise and the process of making representations to the submitted version of the strategy.

**2. RECOMMENDATION**

- 2.1 That members instruct officers to either
- 1) support the Strategy in full:
- Or
- 2) object to the key elements of the plan, specifically
    - a. the level of housing allocated to Bromsgrove
    - b. the potential allocation of Redditch related growth in Bromsgrove and or Stratford to be provided adjacent to Redditch

and that

the portfolio holder for planning writes to Key officers at the Government Office for the West Midlands and West Midlands Regional Assembly as well as the Bromsgrove MP, expressing concern over the decision making process undertaken at the Regional Planning Partnership on the 22<sup>nd</sup> October 2007.

**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 about to be submitted 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 was launched on 27<sup>th</sup> November 2007

3.2 Members will recall that at the meeting of Local Development Framework Working party on 10<sup>th</sup> October 2007 a paper was presented outlining the implications of the revised policies being put forward as part of the review of the RSS. At that meeting it was agreed that the following representation be tabled at the meeting of the Regional Planning Partnership (RPP) on 22<sup>nd</sup> October.

*(a) that Bromsgrove District Council understands the importance in planning policy terms of formally endorsing an option at the Regional Planning Partnership and in particular the current draft option of the RSS phase 2 revision, with the exception of policy T12 which identifies the Longbridge Link road as priority for investment;*

*(b) however, the Council requests the Partnership to reflect on two factors where the Council would like further consideration to be given to the impact that will arise before a final decision is made; namely:*

*(i) the planning logic of one authority being able to build in another's area when the receiving authority is constrained from building itself; and*

*(ii) the short and longer term impact on future homelessness costs and solutions of the intended limited new build quotas.*

3.3 At the meeting of the RPP the West Midlands Regional Assembly made it clear that they were not willing to give any further consideration to the points raised at this time. However the most recent version of the draft revision does appear to have deleted any reference to the Longbridge Link Road, but does not make any amendments to either the Bromsgrove District housing allocations or to those of Redditch and Stratford.

3.4 The levels of development remain as follows

#### **Bromsgrove District**

**Housing** - 2100 dwellings up to 2026 of which 680 are already accounted for  
**Employment Land** - Around 7 Hectares initial supply and around 21 hectares up to 2026

#### **Redditch Borough**

**Housing** - 6600 dwellings of which 3300 adjacent to Redditch town in Bromsgrove and or Stratford Districts.

**Employment Land** - Around 17 Hectares initial supply of which 8 Hectares to be provided within Bromsgrove and or Stratford with a further 34 hectares to be provided up to 2026 exact amounts to be determined through discussions and agreement on preparation of Core Strategies.

3.5 In my view the main implications for the district are as follows.;

A Levels of residential and employment development specifically for Bromsgrove District will be reduced from previous building rates in order to help meet the overall policy objectives of the RSS.

B The level of development identified for Bromsgrove could partially 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.

C The affordable housing needs of Bromsgrove will not be met within the confines of the district, restricting the ability to rebalance the housing market and potentially increasing instances of homelessness.

D 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 major urban area and Redditch and also Bromsgrove and Redditch.

Should any development above that being currently indicated be required, Redditch will be a key focus due to its designation as a Settlement of Significant Development (SSD), potentially further increasing the amount of green belt land required.

Any affordable housing provided in locations around Redditch in Bromsgrove district will be to meet the affordable housing needs of Redditch, and as such will not be available for the majority of Bromsgrove residents.

E 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.

### 3.6 **Consultation Process**

The District Council is not responsible for the consultation on the RSS revision although it is very important that consultation takes place. The West Midlands Regional Assembly is proposing to do very little consultation itself other than to place the final document on deposit in suitable locations. Worcestershire County Council in their remit as a sub region of the West Midlands is undertaking consultation with the parish councils, although not with any other stakeholders. It is hoped that a public meeting can be arranged where the County Council will attend to put forward their view. It is envisaged we will invite relevant people and groups to this event.

### 3.7 **Next Steps**

The submission version of the RSS phase 2 revision will be formally submitted to the Secretary of State on 21<sup>st</sup> December. The submission will be made up of the following documents,

- The Preferred Option
- An Overview Document
- Copies of all Background Technical Studies
- The Implementation Plan
- The Consultation Statement
- The Sustainability Appraisal Report

- The Habitat Regulations Assessment
- A Summary Leaflet
- A Submission Letter

The formal consultation period will begin on 7<sup>th</sup> of January 2008 and run for 12 weeks concluding on 28<sup>th</sup> March 2008. The formal view of the Council to on the policies contained within the RSS revision will have to be completed in time for the meetings of the Executive Cabinet and full Council on the 5<sup>th</sup> and 19<sup>th</sup> of March respectively.

#### 4. **FINANCIAL IMPLICATIONS**

- 4.1 Whilst there are no direct implications of the RSS revision at the moment, the levels of income generated over longer periods could be affected depending on the levels of development taking place in the district. More importantly in the short term the approach Members take at this stage in the process, either objecting or supporting the plan could affect future levels of Housing and Planning Delivery Grant (PDG) the Council receives, as funding is directly linked to the progress that the Strategic Planning section makes on preparing the LDF. (See section 7 for a full explanation).

#### 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; the district council also has an obligation under the act to prepare a Local Development Documents in line with the Local Development Scheme.

#### 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.
- 6.2 The ability to implement the Bromsgrove Sustainable Community Strategy is also highly dependant of the Local Development Framework. Many of the areas covered by the Sustainable Community Strategy cannot be delivered without formal planning polices.

<b>Council Objective (CO)</b>	Regeneration (CO1)	<b>Council Priority (CP)</b>	A thriving market town (CP1)
<b>Impacts</b>			
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, although objecting to the revised RSS could lengthen the process of preparing LDF documents, one of which being the Town Centre AAP			

<b>Council Objective (CO)</b>	Improvement (CO2)	<b>Council Priority (CP)</b>	Customer service (CP2)
<b>Impacts</b>			
No impact			

<b>Council Objective (CO)</b>	Sense of Community and Well Being (CO3)	<b>Council Priority (CP)</b>	Sense of community (CP3)
<b>Impacts</b>			
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.			

<b>Council Objective (CO)</b>	Environment (CO4)	<b>Council Priority (CP)</b>	Housing (CP4) Clean streets and recycling (CP5)
<b>Impacts</b>			
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.			
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:

- Inability to produce development plan documents which are judged to be sound by the planning inspectorate.

7.2 These risks are being managed as follows:

Risk Register: Planning and Environment

Key Objective Ref No: 6

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

7.3 Objecting to the RSS revision would prevent significant progress being made on the Core Strategy from a resource perspective, and more importantly for planning policy reasons. If the Council has to produce a plan in accordance with members' wishes, in relation to

1. the location of development for Redditch related growth, and

2. the level of provision being put forward for Bromsgrove,

There is a significant risk of the final plan being found to be unsound. For a development plan document to be judged as sound it has to be in general conformity with policies and guidance in plans that sit above it in the chain of conformity. To produce a plan which directs Redditch related growth to Bromsgrove town is currently not in conformity with emerging RSS. Similarly to allow development over and above the locally identified need for housing in Bromsgrove would also be in conflict with policies contained within the RSS.

- 7.4 The ability to produce a plan inline with the current Members wishes could only be done, if through the process of the representations and the Examination in Public (EIP) the WM Regional Assembly changed its policy stance and amended the RSS to reflect the views of Bromsgrove District Council. In my view that this is unlikely. This approach could prevent any meaningful progress on Bromsgrove specific plans as we would have to wait for the outcome of the revision not due until early 2009, or run the considerable risk of producing draft polices which are not in conformity with the polices which sit above them and the consequent waste in financial resources that could occur if the plan is found to be unsound and it has to be started from scratch or indeed a plan is imposed on the authority..
- 7.5 Any development on Bromsgrove specific plans which could take place would be affected by the process of objecting to the RSS. Officer time will be directed away from plan production onto challenging the RSS both at consultation stage and at the EIP. Whilst the amount of work involved is hard to quantify it is likely to be considerable, and would need to be undertaken by one of the more senior members of the section. This diversion will mean the ability to prepare the Core Strategy and other development plan documents including the Town Centre AAP could be hampered due to lack of resources.
- 7.6 Progress on the LDF is monitored by the government through the Local Development Schemes and Annual Monitoring Reports produced by the Strategic Planning section. The progress on the Local Development Scheme is a key factor used to allocate Housing and Planning Delivery Grant. Failure to progress the LDF inline with the Local Development Scheme could have short term financial implications. Consistent failure to produce LDF documents specifically the Core Strategy could result in the GOWM taking the strategic planning function away from control of the council. In this case they would employ other planning professionals to prepare the core strategy on behalf of the GOWM and then impose it on the District Council, whilst also requesting that the district council pay the consultancy fees accrued in the process.

8. **CUSTOMER IMPLICATIONS**

- 8.1 Should the council endorse the RSS, it is very likely that in the long term residents who currently live settlements close to Redditch will have the character of these areas fundamentally changed should development, take place in Bromsgrove adjacent to Redditch.

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 direct 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
Executive Director - Partnerships & Projects	Yes
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

12. **APPENDICES**

None

13. **BACKGROUND PAPERS**

None

**CONTACT OFFICER**

Name: Mike Dunphy

email: [m.dunphy@bromsgrove.gov.uk](mailto:m.dunphy@bromsgrove.gov.uk)

Tel: 01527 881325