

# **BROMSGROVE DISTRICT COUNCIL**

## **CABINET**

**3<sup>RD</sup> DECEMBER 2008**

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

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

#### **1. SUMMARY**

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

#### **2. RECOMMENDATION**

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

#### **3. BACKGROUND**

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

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

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

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

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

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

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

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

#### 3.4 Contents of the full Response

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

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

### 3.5 Chapter 2: Towards a More Sustainable Region

#### **Policy SR1 Climate Change**

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

### 3.6 Policy SR2 Creating Sustainable Communities

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

### 3.7 Policy SR3 Sustainable Design and Construction

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

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

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

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

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

### 3.9 Chapter 5: Rural Renaissance

#### **Policy RR1 Rural Renaissance**

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

### 3.10 Chapter 6: Communities for the future

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

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

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

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

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

#### **3.12 Policy CF4 Phasing of New Development**

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

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

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

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

### **3.14 Policy CF7 Delivering Affordable Housing**

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

### **3.15 Policy CF8 Delivering Mixed Communities**

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

### **3.16 Policy CF10 Managing Housing Supply**

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

### **3.17 Chapter 7 Prosperity for All**

#### **Policy PA1 Prosperity for All**

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

### **3.18 Policy PA3 High Technology Corridors**

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

### **3.19 Policy PA6A Employment Land Provision**

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

**3.20 Policy 6B Protection of Employment Land and Premises**

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

**3.21 Policy PA12B Non-Strategic Centres**

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

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

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

**3.23 Chapter 8 Quality of the Environment**

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

**3.24 Policy QE4 Greenery, Urban Greenspace and Public Spaces**

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

**3.25 Policy QE 5 Protection and Enhancement of the Historic Environment**

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

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

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

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

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

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

**Policy T5 Public Transport and T6 Strategic Park and Ride**

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

**4. FINANCIAL IMPLICATIONS**

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

**5. LEGAL IMPLICATIONS**

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

**6. COUNCIL OBJECTIVES**

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

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

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

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

## **7. RISK MANAGEMENT**

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

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

7.2 These risks are being managed as follows:

Risk Register: Planning and Environment

Key Objective Ref No: 6

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

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

## **8. CUSTOMER IMPLICATIONS**

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

## **9. EQUALITIES AND DIVERSITY IMPLICATIONS**

9.1 None

## **10. VALUE FOR MONEY IMPLICATIONS**

10.1 None

## **11. OTHER IMPLICATIONS**

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

## 12. OTHERS CONSULTED ON THE REPORT

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

## 13. WARDS AFFECTED

All Wards

## 14. APPENDICES

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

## 15. BACKGROUND PAPERS

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

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

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