

West Midlands Regional Spatial Strategy Phase Two Revision

Consultation Response Form on the West Midlands RSS Phase Two Revision
Draft submitted by the West Midlands Regional Assembly

Making Comments

It is very helpful to us if you use this form to make your comments and if possible e-mail or post it to the following:

WMRSS Panel Secretary
c/o Government Office for the West Midlands
5 St Philip's Place
Colmore Row
Birmingham B3 2PW

E-mail: wm.panelsecretary@gowm.gsi.gov.uk

Deadline for Comments

Deadline for receipt of completed forms is **12.00pm on 8th December 2008**

Additional Copies

Additional copies of the form can be downloaded from the Government Office for the West Midlands web site at <http://www.go-wm.gov.uk> or www.wmra.gov.uk or can be requested by contacting Government Office for West Midlands on: 0121 352 5476.

How to complete this form

Please complete a separate copy of the form for each matter that you wish to comment on, showing each time which policy or paragraph of the WMRSS Phase Two Revision Draft Submission documents you are commenting on.

Please note that all comments will be made available for the public to read – they cannot be treated as confidential. However, please be assured, WMRSS Panel Secretary will only use the contact details provided for the sole purpose of distributing appropriate information about this consultation and the next stages of the process.

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I am commenting as (please tick)			
A private individual		Local Authority of Parish Council	
Business representative group		Campaign Group	
Utility and emergency services		Statutory Body or Government Agency	<input checked="" type="checkbox"/>
Landowner, Developer or Agent		Voluntary / Community group	
Representative of a client		Other (please specify)	
If you are commenting on behalf of a client, please add their name here			

Please indicate which Paragraph or Policy your comment relates to:	
Paragraph Number	Policy Number

Please use the section below to give your comments.

Please see attached response

(Please continue on a separate sheet if required)

**West Midlands Regional Spatial Strategy
Phase 2 Revision- Draft
Preferred Option
December 2007**

Response from Bromsgrove District Council

1 Bromsgrove District Council (BDC) welcomes the opportunity to comment on the Draft Revision.

1.1 BDC acknowledges that responses should be supported by robust evidence. Since the West Midlands Regional Spatial Strategy (WMRSS) Spatial Options consultation stage a considerable body of evidence in the form of studies and research commissioned to support the production of the Draft Core Strategy has been amassed. This process is ongoing and our evidence base will continue to be developed and refined as the Draft Revision progresses to Examination in Public (EIP). BDC has drawn upon this evidence base in responding to the current consultation exercise and will provide any additional information as required for the EIP.

1.2 In overall terms BDC accepts that the Draft revision strikes an appropriate balance between keeping the terms of the existing regional strategy and its aims, meeting established housing and development needs and promoting sustainable development. Whilst BDC is submitting a comprehensive response with a wide range of detailed and important objections, this does not detract from our in principle support for the strategic aims of the WMRSS. In some instances below and where identified the comments are made jointly and in agreement with Redditch Borough Council (RBC). Comments have been made in relation to specific policies although in many instances can be applied to many areas of the RSS revision document.

1.3 BDC is however concerned that the draft revision suffers from a number of significant omissions. We do not believe that the omissions identified are beyond the scope of the current phase 2 partial review defined by the Secretary of State. Further, it is essential that the WMRSS address these omissions in order to enable subsequent Development Plan Documents (DPD's) to develop effective policies and proposals as a means of bringing forward key elements of the RSS.

1.4 BDC consider the following headlines summarise our main concerns and/or objections:

- 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 supporting documentation, 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.

2 TOWARDS A MORE SUSTAINABLE REGION

Key issues in the West Midlands

2.1 **RSS Paragraph 2.20 - Climate Change Page 19** BDC welcomes the recognition of the importance of the global and urgent issue of climate change, and the priority given to this early in the Strategy. However, it is important to acknowledge that the impacts arising from a changing climate are already being faced. Paragraph 2.16 appears to imply that the effects of climate change are due to be felt at some time in the future, thereby failing to convey the urgency of the situation. It should be made explicit that the changing climatic conditions referred to in paragraph 2.27 will be experienced both within the plan period and beyond.

2.2 BDC and RBC question whether large scale greenfield development around Redditch will serve the local economy and not increase CO₂ emissions from additional commuters, especially given the poor sustainable transport links to the majority of its neighbouring towns, as raised later in this response.

This paragraph also states that:

The scale of change and development in the MUA's (Major Urban Areas), which is necessary to meet the objectives of both economic and environmental transformation, and the proposed growth at the Settlements of Significant Development, provide an opportunity to make a significant contribution to the reduction in growth of carbon dioxide emissions.

2.3 BDC consider that the opportunity should be taken to expand the text to emphasise that all development has a role to play in contributing towards reducing carbon emissions. Furthermore, as it is known that Europe is urging the Government for more challenging targets, the Strategy should set targets towards achieving the Government's target of a 26-32% cut in carbon dioxide emissions by 2020.

2.4 It should also be acknowledged that minimising emissions from new development is only part of the equation. Growth in emissions will still emanate from the existing building stock and therefore greater emphasis should be

placed on the potential for existing buildings to mitigate and adapt to climate change.

SR1 Climate Change (*RSS page 21*)

2.5 This policy is welcomed by BDC, however, the opportunities described in section A should relate to all new development and not be limited to MUA's and Settlements of Significant Development (SSD) for example, by expanding Section C to require all new development to develop and use renewable energy.

2.6 In **paragraph 2.24** the emphasis is on bringing forward the development of brownfield land and this is reinforced throughout the RSS without acknowledgement of the practical difficulties in bringing forward such development in a timely fashion. Furthermore, by weakening the argument for the protection of the Green Belt (paragraphs 3.3 and 3.9), it is not difficult to imagine where the thrust of new development is likely to be focussed. BDC therefore considers that the weakening of the Green Belt policy is regrettable and self defeating, particularly in the delivery of brownfield development.

2.7 Clarity would be improved if this policy was split into mitigation and adaptation sub sections, and there should be reference in this overarching policy of a target for CO2 reduction.

2.8 BDC consider that SR1D is unnecessary. It should be a given that all policies will be monitored and reviewed. Mechanisms for achieving this should be clarified in Chapter 10 Implementation and Monitoring.

SR2 Creating Sustainable Communities (*RSS page 22*)

2.9 **Paragraph 2.22** – Promote a good public transport network which is linked to other nearby towns.

BDC and RBC both agree that:

2.10 This paragraph clearly indicates that the designations of SSDs were determined by, amongst other things, the ability to provide 'good public transport, well linked to other nearby towns'. Redditch has good links to Birmingham (rail and bus). However, there are no rail links to neighbouring Worcestershire and Warwickshire towns, and bus links are poor in comparison to links with the conurbation. This is well documented in the Worcestershire and Redditch Sustainable Community Strategies. As local authorities have no control over transport companies and currently transport links within Redditch itself are in decline with respect to evening services, BDC and RBC are unsure how transport links could be secured for improvement through development within Redditch town. There is concern that good public transport links could fail to materialise leaving an increase of commuters in Redditch with a greater reliance on private car travel which would be contrary to Policy SR2, 'Creating Sustainable Communities'.

2.11 Other SSD locations which had a previous designation of sub-regional foci (SRF) had the considerable benefit of bidding for funding to secure sustainable transport infrastructure. Without prior knowledge of such a designation for Redditch, funding opportunities were not applied for. This lack of potential funding would leave Redditch at a distinct disadvantage and would be in conflict with Policy SR2 F *“to provide of the necessary public transport infrastructure so as to improve accessibility to employment, services and facilities both within and between settlements”*

2.12 BDC would also comment that any extension to Redditch that aims to mirror the low density and high levels of open space that the borough currently experiences could potentially be at odds with *“the delivery of sustainable communities that are designed and planned at an appropriate size scale and density.”*

RSS Paragraph 2.24 – Emphasis on development on brownfield land.

BDC and RBC both agree that:

2.13 This paragraph clearly states that beyond the MUAs, significant development should be brought forward; focussed in the SSDs with an emphasis on development of brownfield land as a principle focus. The proposed allocation of 6600 dwellings to meet Redditch Borough’s natural growth will have to be predominantly sited on greenfield, moreover, Green Belt land. The Draft Preferred Option states that 3300 dwellings to meet Redditch related growth are to be located in Bromsgrove and/or Stratford-on-Avon Districts; all 3300 dwellings will be on Green Belt land.

2.14 Of the 3300 dwellings allocated to be found within the Redditch Borough boundary, the findings of the White Young Green stage 2¹ (WYG 2) are, amongst other things, that ADRs in Redditch favour less well for development that the use of further Green Belt land within Bromsgrove District. With regard to this WYG 2 conclude that the Redditch SHLAA (October 2008) has identified sites with potential to accommodate around 1700 dwellings on brownfield land, including a windfall allowance based on brownfield completions.

To summarise:

Completions 2006-2008	690 dwgs	B/F = 608 G/F = 82	
SHLAA B/F sites	647 dwgs		
SHLAA G/F sites	316 dwgs		
SHLAA B/F & G/F mix sites	158 dwgs		
B/F windfall allowance	432 dwgs		
Total	2243 dwgs		

Table 1

¹ Study into the Future Growth Implications of Redditch Second Stage report White Young Green October 2008

6600 – 2243 = 4357 to be found in Bromsgrove and/or Stratford-on-Avon Districts.

2.15 Taking account of completions, this equates to a minimum of 72 per cent of the Redditch allocation of 6600 dwellings to be accommodated on greenfield land. Of this, 66 per cent will be on Green Belt land in neighbouring districts. Therefore, the percentage of development associated with meeting Redditch's natural growth on brownfield land will be in the region of 28 per cent. BDC and RBC question that this can be considered as an 'emphasis on development of brownfield land' and whether this is contrary to the goal of achieving urban renaissance.

2.16 Given that beyond the MUAs a high percentage of development within shire areas is likely to be on green field land and furthermore, development is also likely to involve urban extensions on a significant scale. If Local Planning Authorities are to deliver genuinely innovative sustainable development, it is essential that the WMRSS sets appropriate standards with respect to both aspirations and expectations for the environmental and sustainability expectations in new development.

2.17 **Policy SR2** repeats parts of SR1 but with different emphases making it not only duplicatory but also confusing, for example, in relation to renewable energy regeneration. Policy issues in relation to renewable energy are repeated again in policies EN1 and 2 (pages 137-139).

2.18 **Paragraph 2.27** states that design and construction should be adaptable to the changing climate conditions "*where feasible*". BDC and RBC consider that there should be stronger emphasis placed on the standards of construction materials and a requirement by house-builders to meet them. If meeting these standards reduces profit margins, then without more stringent guidance for house-builders it may result in the use of less efficient materials or cost cutting.

2.19 This policy refers to development within the "MUAs", "Settlements of Significant Development", and "other areas where development is concentrated". In order to avoid confusion it is considered that it is important to ensure a continuity of terms throughout the document. Other policies include references to, for example, "other urban areas" and "market towns" (CF2B), but it is unclear whether these terms are generic or specific.

SR3 Sustainable Design and Construction (page 25)

2.20 BDC welcomes this policy and recognises the potentially huge impact it could make but recognises that there is some repetition with policies SR1 and SR2.

2.21 Given its extensive cross-sector support, greater weight should be placed upon the West Midlands Sustainability Checklist², as it encompasses the sustainability issues from SR1C but is only briefly mentioned.

² <http://www.checklistwestmidlands.co.uk/>

2.22 The threshold is set at 10 residential units or 1,000 square metres. Policy CF10 informs us that over half of all completions are from windfall sites. Therefore, it may mean that setting the threshold at 10 residential units will result in substantial amounts of new development not being included. BDC is concerned that by setting the threshold so high, the Government target for CO2 reduction may not be achievable.

2.23 BDC and RBC both agree that this policy criterion should be strengthened. Stating “*at least*” and “*wherever possible*” as a guide to achieving acceptable standards for sustainability leaves a ‘loop hole’ for developers to avoid meeting lower carbon levels for as long as possible. Also setting “*appropriate targets*” for developments through dialogue between local planning authorities and developers is also open to miss-use and inconsistency. What developers should be providing and the timescale in which to do it so should be addressed as a standard regionally, if not nationally.

Policy SR3 Sustainable Design and Construction, Criterion (C)

2.24 BDC and Redditch Borough Council (RBC) both agree that with respect to the targets set for reducing carbon emissions in new homes up to 2016, this criterion could be more stringent. “*Considering the potential for securing higher standards*” should be expressed as a more firm requirement. In addition, 2016 is halfway through the plan period and some eight years away. Therefore, the WMRSS should be aiming to achieve zero carbon levels sooner than this date.

Policy SR3 Sustainable Design and Construction, Criterion (G)

2.25 BDC and RBC both agree that the requirement to meet or exceed level 4 for water conservation conflicts with the requirements of Policy SR3, Criterion (C). The water conservation requirements should also be aiming to achieve level 6 – preferably at the same rates set out in Policy SR3, Criterion (C), especially if Policy SR3, Criterion (C) is revised and made more stringent.

2.26 **RSS Para 2.29** states that significant investment in waste water infrastructure is likely to be needed. In the case of future development in and around Redditch Borough, this investment will be needed. Investment needs to consider remediation of existing problems as well as the provision for new infrastructure. Existing ‘hot spots’ in the sewerage system should be eliminated not exacerbated during future development. As a SSD which was not privy to Growth Point funding, BDC and RBC question where such ‘significant investment’ will come from to secure its infrastructure needs if the SSD designation remains.

2.27 Finally, it is considered that there is lack of consistency between the climate change and sustainable construction policies and other policies in the document. For example: PA1B (v) “*encourages*”, yet SR3 “*requires*”.

SR4 Improving Air Quality for Sensitive Ecosystems (page 27)

2.28 BDC welcomes guidance on this issue and notes that this work is to be developed as part of the WMRSS Phase 3 Revision.

It is suggested that to aid clarity, areas of poor air quality and the 13 sensitive European sites referred to in this policy are indicated on the Spatial Strategy Diagram.

3. THE SPATIAL STRATEGY FOR THE DEVELOPMENT OF THE WEST MIDLANDS (page 30)

3.1 **RSS Paragraph 3.3** states that *“MUAs do not have the land capacity to accommodate the necessary building without making inroads into Greenfield/Greenbelt land. Consequently... local authorities in the surrounding Shires are anticipated to provide housing beyond their own generated needs in order to meet this shortfall”*. BDC and RBC both agree that this statement is contrary to the principle of urban renaissance and compromises the objectives in the RSS.

3.2 **RSS Page 31**, this section of the WMRSS re-affirms four key challenges facing the Region, these are:

- a. Urban Renaissance
- b. Rural Renaissance
- c. Diversifying and modernising the Region’s Economy
- d. Modernising the transport infrastructure of the West Midlands

3.3 BDC endorses the above challenges but would also suggest that an additional challenge should be added which reflects the challenge faced by settlements beyond the MUAs to accommodate significant additional growth which are characterised by major urban extensions on green field land.

3.4 BDC and RBC both consider that alteration to the WMRSS Green Belt objective has invited unnecessary and compromising erosion of Green Belt land without giving adequate consideration to alternative more sustainable development options.

3.5 **RSS Paragraph 3.11** states that new development will be focussed in the SSDs without attracting investment or migration from the MUAs. BDC and RBC consider that the four newly designated SSDs, which were not previously Sub Regional Foci, will be detrimental to urban renaissance and the WMRSS objectives. BDC considers that the locations of these four newly designated SSDs are too close to the MUAs and the original SRF to complement their role in the Region. It is considered that, for example, out-migration from Birmingham to Redditch would be considered, by most people, to be an acceptable distance to move/commute. This view has also traditionally been held, e.g. in RPG.11 the central crescent was identified as an area where development should be avoided because it would risk increasing out migration/commuting levels.

3.6 **RSS Paragraph 3.7** (page 31) states that *“The Spatial Strategy can be broadly summarised as enabling all parts of the Region (not necessarily individual settlements or local authorities) to meet their own needs, in a mutually supportive and sustainable way. Protecting and enhancing the Region’s environmental assets and, where appropriate, making economic use of them, together with the prudent use of natural resources, is a core element of this and will be particularly important in guiding the nature and location of development and improvements at sub-regional and local levels”*.

3.7 BDC supports the principles expounded here but questions whether elements within the remainder of the strategy will achieve these aims, for example:

b) Rural Renaissance - supporting rural communities to achieve their economic and social potential whilst embracing the challenges of access and climate change

BDC does not consider that the level of growth allocated to the District will allow it to achieve its economic and social potential. The reasons for this are partly explained under PA6A Page 28.

3.8 Furthermore, in reference to paragraph 3.65 Bromsgrove wishes to register its objection to the designation of Redditch as a SSD on the grounds of its adverse implications for Bromsgrove as outlined later in this report.

3.9 **RSS Paragraph 3.12 (page 33)** BDC consider that sub-paragraph a) is misleading as it implies that WMRSS growth requirements can be essentially met in Settlements of Significant Development, and at other settlements peripheral development would appear to be an exception. The paragraph suggests 'some peripheral development of other settlements may need to be considered in LDDs'. There is clear evidence that implementation of the WMRSS Draft Revision will necessitate substantial green field releases in other areas.

3.10 **RSS Paragraph 3.13** states that the six Regeneration Zones and the three High Technology Corridors will provide spatial focus for economic growth and diversification. In relation to this statement, all four newly designated SSDs are located significantly outside the Regeneration Zones and three of the four newly designated SSDs are not in the vicinity of the High Technology Corridors. BDC and RBC question the designation of the additional four SSDs (including Redditch) as their locations within the Region in relation to the Regeneration Zones and High Technology Corridors do not appear to contribute towards the WMRSS spatial focus of 'economic growth and diversification'.

3.11 **RSS Paragraph 3.14** states that "*the delivery of the necessary supporting infrastructure, by a variety of agencies is critical to the realisation of the RSS.*" With respect to large scale greenfield development in and around Redditch, The Joint Study into the Future Growth Implications of Redditch Town to 2026 (White, Young, Green, 2007) states that "*any development in or around Redditch may be significantly constrained by Severn Trent Water's feasibility, design and build programmes for the delivery of new assets. Severn Trent will not programme this work before their 2010-2015 capital investment period.*" This gives cause for concern and BDC and RBC raise the question of whether the necessary infrastructure will be in place to deliver specific allocations by the end of the Plan period. BDC and RBC also question whether this type of funding programme may also have serious implications with respect to delivery of the RSS, elsewhere in the Region.

3.12 **RSS Paragraph 3.61** acknowledges that in the past, Redditch has been a centre used to accommodate 'overspill' from the conurbation and stresses that the RSS has adopted a change in policy direction, whereby migration from

the MUAs will be limited to 'overspill' locations. Para 3.62 specifies that 'overspill' will now be focussed in the SSDs, of which Redditch is one. BDC and RBC do not consider that a 'change in policy direction' has been adopted with respect to this point. It is considered that limiting migration to SSDs (or overspill locations) is likely to attract out-migration from the MUAs. Paragraphs 3.61 and 3.62 contradict each other and undermine the principle of urban renaissance. Redditch Borough has not been considered as an overspill location for conurbation related growth since its designation as a New Town in the 1960s. County Structure Plan housing targets for Redditch Borough since 1986 have been to accommodate natural growth only.

3.13 RSS Paragraph 3.63 and pages 40-45 The original sub regional foci settlements are still referred to as New Growth Points in the Draft Preferred Option document . None of the additional four SSDs (previously 'other large settlements) have been referred to as NGPs. They are merely referred to as centres which will meet the housing and employment needs of the area, rather than accommodating development beyond natural growth.

3.14 BDC and RBC consider that only meeting Redditch's own natural growth should not constitute a designation of SSD and would seek to have this designation removed through the Examination in Public (EiP) process. BDC and RBC are most concerned that this imposed designation will result in Redditch being allocated a significantly higher housing target following the publication of the NLP report into higher housing provision for the West Midlands Region.

Spatial Strategy Objectives

3.15 The spatial strategy objectives for the WMRSS includes the following statements (Page 32):

to retain the green belt but to allow an adjustment to boundaries where exceptional circumstances can be demonstrated to support urban regeneration or to allow for the most sustainable form of development to deliver the sub regional implications of the strategy.

to ensure the quality of the environment is conserved and enhanced across all parts of the region

However, the Preferred Option document does not provide any specific or additional guidance with respect to the future general extent of the West Midlands Green Belt.

3.16 Without any formal green belt review at a strategic level BDC is concerned that the Phase 3 Partial Review of the WMRSS will not focus enough on the coverage of the green belt, and simply focus on policies that apply to the current green belt. It is also stressed that changes to the green belt through the RSS should be given increased importance in the Phase 2 element, in order to give earlier clarity to green belt local planning authorities who are attempting to progress core strategies.

3.17 Furthermore, as mentioned in PPG2 (paragraph 2.9) that "*Wherever practicable a Green Belt should be several miles wide, so as to ensure an*

appreciable open zone all round the built-up area concerned. Boundaries should be clearly defined which will help to ensure the future agricultural, recreational and amenity value of Green Belt land.” The expansion of Redditch into the surrounding Green Belt land will not only result in merging of the urban area with surrounding smaller settlements, it could also reduce its strategic gap to Bromsgrove to only 4km (2.5miles) and to Birmingham to only 6.2 km (3.8 miles). Moreover, without defensible boundaries it will be difficult to ensure that the possible re-defined Green Belt boundaries will be able to ‘check the unrestricted sprawl of urban areas’.

3.18 The WYG 2 study favours locating all of the proposed Redditch growth to the north of Redditch in the area known as Bordesley Park. It is considered that this would result in an incongruous boundary to the Redditch urban area, with resultant development projecting out considerably into the countryside, with no apparent defensible boundary. Additionally the Arrow Valley green corridor runs through Redditch, effectively bisecting its urban area on an approximate north/south axis. If Redditch growth results in development of land to the north of Redditch, this would result in this green corridor being abruptly severed. Consequently, if development is pursued in this location, not only will it result in an ill conceived and awkward built form but the ‘broken’ green corridor is also likely to have an adverse impact on biodiversity and this point is further expanded upon under policy QE4.

The Spatial Strategy Diagram (page 48)

3.19 Bromsgrove is defined as an “Other Large Settlement” in the Spatial Strategy Diagram. The WMRSS does not explain this classification in terms of role and function. BDC would welcome explanation of this categorisation as this is not clear within the document.

4 RURAL RENAISSANCE

Policy RR1 Rural Renaissance (Page 60)

4.1 Policy RR1 states” *It is important that activities to improve the quality of life in the rural areas protect and enhance their unique qualities including their environmental assets.”*

and furthermore

RR1 B states that *policy priorities will vary according to a number of factors including the quality of the environment, local character and distinctiveness, need for new employment, need for additional housing, including affordable housing to meet local needs, and stem population decline and access to services and facilities.*

RR1 C I states that *with regards to rural areas which are subject to strong influences from the MUA’s and which are relatively prosperous and have generally good access to services, the main priority will be to manage the rate and nature of further development to that required to meet local needs whilst ensuring that local character is protected and enhanced.*

4.2 It is acknowledged that the allocation of 6600 dwellings (Policy CF3) dwellings to Redditch together with associated employment land cannot be accommodated within its administrative boundary. Therefore Bromsgrove and/or Stratford upon Avon have been identified as locations where this additional growth should be accommodated. It is considered that this is contradictory. By meeting the needs of Redditch within Bromsgrove's boundaries adjacent to Redditch this is not meeting Bromsgrove's needs and is certainly not ensuring the local character of Bromsgrove is protected and enhanced.

4.3 Furthermore, by stipulating that this development must be adjacent to Redditch this immediately puts Green Belt land under threat. Bromsgrove is 91% Green Belt and therefore the Green Belt comprises the inherent character of the district. Moreover, the Green Belt land to the north of Redditch, where the recent White Young Green study recommends development should be sited, performs a strategic function of preventing the coalescence of Redditch and Birmingham and clearly this relatively narrow gap would come under threat of further erosion as explained above.

5 COMMUNITIES FOR THE FUTURE

5.1 **Paragraph 6.2** Page 62 states "*Excessive development on greenfield sites outside the MUAs could fundamentally undermine the process of urban renaissance.*" BDC and RBC consider this statement should be reconsidered especially with respect to the designation of a SSD for Redditch Borough and the fact that 72% of its Preferred Option allocation will have to be accommodated on greenfield sites (66% on Green Belt land). BDC and RBC are of the opinion that 72% greenfield development to meet Redditch's local needs is, without doubt, 'excessive'. BDC and RBC acknowledge that the Preferred Option allocation is only to meet its natural growth needs, however, BDC and RBC consider that the designation of a SSD can only exacerbate the undermining of urban renaissance in the future.

5.2 **Para 6.12 – Housing within the Major Urban Areas (MUA's)** BDC and RBC consider Paragraph 6.12 to contradict Paragraph 3.61. Paragraph 6.12 states that the "*Spatial Strategy assumes that net out-migration (from the MUAs) can be stemmed.*" If this is the case, why does Paragraph 3.61 state that migration will be limited to overspill locations? Clarification on this issue would be welcomed.

Policy CF2 Housing Beyond Major Urban Areas (page 73) and CF3 Level and Distribution of New Housing Development (page 74)

5.3 WMRSS states that beyond the MUA's, strategic housing development should be concentrated in and adjacent to towns which are capable of balanced and sustainable growth without significant harm to local communities and in sustainable locations. These are the Settlements of Significant Development (SSD) and as abovementioned it is proposed that Redditch should be designated as an SSD.

5.4 The draft housing target for Redditch Borough (within and beyond its administrative boundary) is 6600 dwellings. 3300 of which are to be found in

Bromsgrove and/or Stratford-upon-Avon districts, all of which would be on Green Belt land. Such a large allocation of greenfield development on the edge of Redditch would not contribute towards stemming the outward movement of people and jobs away from the MUAs. Given the likely proximity of development north of Redditch (WYG report, 2007), the 'gap' to the conurbation would be reduced and would continue the trend of increasing pressures on the environment, encouraging development on greenfield sites and increasing the need for car-based travel as commuters would continue to travel into the conurbation. This would be to the detriment of the Region's key challenges to alleviate these issues.

5.5 In order to address the cross boundary issues raised in the WMRSS Bromsgrove District, Redditch Borough Council and Stratford upon Avon District Councils have been working together during the preparation of their respective core strategies. This demonstrates the commitment of the three authorities to jointly and strategically address the proposed Redditch growth issue in the WMRSS and role of Redditch Town as a Settlement of Significant Development.

5.6 In order to support the preparation of the WMRSS, Worcestershire County Council, Redditch Borough, and Bromsgrove and Stratford District Councils commissioned consultants White Young Green to undertake a 'Joint Study into the Future Growth of Redditch Town to 2026'. This study was completed in December 2007 and forms a key part of the evidence base for the RSS. However, there was general agreement between the authorities concerned that the Joint Study was insufficiently detailed, to allow district level splits of Redditch Borough-related growth to be identified. It was therefore agreed that additional work needed to be done to augment the broad study findings.

5.7 White Young Green were subsequently commissioned to undertake this work on behalf of the West Midlands Regional Assembly, Worcestershire County Council, Redditch Borough, and Bromsgrove and Stratford District Councils. This study into the Future Growth Implications of Redditch by White Young Green concluded that of the 6600 dwellings allocated to Redditch (Policy CF3) only 2250 can be accommodated within its boundaries.

5.8 In terms of harm to local communities the study also identified that all of the housing growth and the majority of employment growth should be in the Bromsgrove District, apart from a small amount of employment growth which could be located in Stratford District. Since the RSS stipulates that this growth should be adjacent to the boundary of Redditch, it is impossible to imagine how the growth of 4350 new homes cannot harm local communities in terms of coalescence of settlements, additional traffic movements, disturbance, loss of amenity/quality of life, loss of accessibility to the countryside, further degradation of air quality and so on. Furthermore, the land take alone of this scale of development equates to in excess of 300 hectares of green field/greenbelt land.

5.9 BDC consider that the WMRSS should be absolutely clear by stating that development associated Policy CF2, at Redditch can not be implemented without the provision of the essential infrastructure. For example, Redditch

Borough Council considers that its town centre may struggle to meet the levels of provision required by its natural growth in population. If Redditch Borough is allocated additional housing in excess of its natural growth, by virtue of its designation as a SSD, it will fail to meet these criteria.

5.10 In further joint working arrangements between the 3 authorities in relation to Redditch growth issue, opportunities and mechanisms for funding such as the Community Infrastructure Levy are being jointly explored and developed. Work has progressed with technical stakeholders on the preparation of respective core strategies and this work together with the evidence base has identified initial infrastructure requirements. Whilst investment will need to be built into programmes of infrastructure providers, significant additional investment will also be required. Further detailed work is still required to identify all constraints and infrastructure needs.

5.11 **RSS Paragraph 6.26** sets out several factors that local authorities should take into account when developing LDDs and responding to planning applications, including sustainable drainage systems. It should also make it explicit that it will be essential that the distribution of development must take account of both watercourse floodplains and, particularly in the light of the impact of climate change, areas liable to flash flooding, and of the need for and importance of, the preparation of strategic flood risk assessments to assist the decision making process in relation to the appropriate distribution of development within the sub-regions.

5.12 It should be noted here that Bordesley Park, the area identified by White Young Green in their stage 2 report as the optimum area for the proposed Redditch growth, is affected by flooding with 2 fluvial flood plains dissecting this land. The implication of this, particularly in terms of the, as yet, unquantified impact of climate change and its potential required mitigation measures, for example, through the use of Sustainable Drainage Systems, may have further adverse impacts in terms of total eventual land take and warrants additional detailed investigation work.

5.13 BDC and RBC consider that footnote (e) to Policy CF3 should provide a more precise breakdown regarding the distribution of new housing to meet Redditch Borough's natural growth needs within Bromsgrove and/or Stratford-on-Avon Districts.

5.14 There are a number of key issues within the District that were first identified in the Bromsgrove Sustainable Community Strategy (SCS), which will be addressed within the emerging Core Strategy. The SCS contains a high level action plan for housing and in particular recognises the need for greater levels of affordable housing in the district. The Core Strategy is the main delivery mechanism for addressing the affordable housing needs of the District. One of main aims of the Core Strategy is to ensure the housing needs of the District are met, including increased provision for our ageing population. Within the Core Strategy there is a focus on regenerating the town centre and an AAP is already being delivered to facilitate this regeneration. Providing a new train station that will provide better links with the town and surrounding area has also progressed to an advanced stage. It is crucial that the Core Strategy helps to expand the employment base within the District. Many people commute out of

the District on a daily basis for work and this is clearly not sustainable. It is imperative that the Core Strategy helps to deliver a range of jobs for the local population. Bromsgrove is characterised by a number of small settlements and the Core Strategy will help to maintain the vitality and viability of such settlements.

5.15 This provides a brief overview of some of the main issues that the Council will seek to address through its emerging Core Strategy, however there is a concern that achievement of these objectives may be undermined due to policies contained within the emerging RSS. Policy CF3 allocates 2100 dwellings for the district of Bromsgrove to meet its own housing needs over the period from 2006-2026. This low allocation in turn significantly hampers the Council's ability to accord with policies CF7 and CF8 as affordable housing targets would not be met and there would be insufficient housing to deliver balanced mixed communities.

5.16 The low level of growth identified within Policy CF3 also hampers the District's ability to accord with a number of policies within the Prosperity for All chapter including policies PA1, PA3, PA6, PA12B, PA14 and PA15. Modest levels of housing development may restrict economic growth within the District with people being forced to look outside the District to meet their own housing needs. This could in turn limit development at Bromsgrove Technology Park and other employment sites throughout the District and restrict the redevelopment of the town centre. Whilst low levels of growth may also limit the vitality and viability of local centres leading to the closure of essential services.

5.17 It is therefore clear that Bromsgrove District Council has strong and wide ranging concerns over the allocation of just 2100 homes in the plan period from 2006-2026. Firstly it is important to put the 2100 figure into context. In first 2 years of the plan period (06/07 & 07/08) 411 homes have been delivered. On top of this there are 347 commitments (at 1st April 2008), of which 125 are under construction. If all of these commitments were to come forward this would leave 1342 dwellings for the remainder of the plan period.

5.18 The Taylor Review (2008) emphasises the substantial housing growth that is occurring in market towns, which can be applied to Bromsgrove as it would need a significant increase in its housing stock to accommodate growth. The 2008 Bromsgrove District Housing Market Assessment examines UK National Statistics (2004) that projects population and household change for Bromsgrove District from 2006 to 2026. In 2006, there was an estimated 91,600 people and 37,000 households, an implied average of 2.5 people per household. The area's population is expected to increase steadily by 6 per cent to 2016 and 11 per cent by 2026. The key problem identified from these statistics, is that household growth will exceed population growth and, compared to a 2006 baseline, the number of households is projected to increase by 14 per cent to 2016 and 22 per cent by 2026. It is expected, in accordance with national trends, which average household size will fall from 2.5 in 2006 to 2.3 by 2016. The 2008 Housing Market Assessment therefore concludes, the total number of households in the District is projected to increase by 8,000 between 2006 and 2026, a trend which implies a strong locally generated growth in the need and demand for housing.

5.19 The evidence document for the RSS Phase 2 Revision entitled 'Communities for the Future: Housing Background Paper' also identifies the same level of household growth. This figure is exceptionally higher than the RSS allocation of 2,100 and if not taken into account would result in a severe undersupply of housing. Research conducted by Bromsgrove District Council has promoted the District's strength in accommodating extra growth by illustrating potential sustainable housing sites; a topic that will be discussed in more detail under the 'availability of suitable land' section of the Council's response.

5.20 The Taylor Review (2008) also acknowledges a discrepancy between planned new homes and projected growth in rural areas. Analysis of emerging Regional Spatial Strategies indicates that nationally planned housing numbers are lower than household growth projections, with this disparity between supply and demand considerably higher in rural areas. DCLG analysis indicates planned housing provision in emerging RSS amounts to only 91 per cent of projected household growth, but for rural areas the differences are exceptionally larger, where planned housing provision is just 81 per cent of projected household growth. The disparity between planned provision and future housing growth is extremely poignant within the West Midlands. The RSS Phase 2 Revision states a provision for 365,000 dwellings by 2026, yet 2004 projections suggested 382,000 new homes are required to accommodate current need. This issue has been further intensified by the NHPAU report (2008) which recommends between 415,000 and 455,500 homes should be provided in relation to future housing growth. These figures would suggest that the current WMRSS housing provision is prospectively 80 per cent of projected household growth, which would be amplified in rural districts such as Bromsgrove.

5.21 The Taylor Review (2008) also identifies housing allocations in RSSs are being prioritised towards urban development in key service areas at the expense of wider rural areas, in part as a result of emphasis on purely environmental sustainability criteria rather than broader social and economic concerns in rural areas. This concept was also supported by research conducted by Three Dragons (2007) in a report for the Commission of Rural Communities. This issue is a concern for Bromsgrove as it is a predominantly rural district, and rural projections forecast that demand for housing will continue to rise substantially faster than supply, which increases competition for housing, pushes up prices and squeezes out people who cannot afford larger mortgages. Therefore, the proposed allocation of 2,100 dwellings will be insufficient to impact on housing affordability.

5.22 The Strategic Housing Market Assessment (SHMA) stressed that the current moratorium and two thirds reduction of new approvals will increase prices and also increase the number of households unable to compete in the market place. Bromsgrove is also one of the top three highest priced LHMA's in the South Housing Market Area. The District Level Housing Market Assessment (2008) also acknowledges that younger people in Bromsgrove have a strong aspiration to buy a home. Yet, the ability to do so is severely constrained by high property prices and affordability, which forces them to move elsewhere. This Housing Market Assessment further supports the reality of demand for housing exceeding supply by conditioning a projected 8,000 increase in households by 2026.

5.23 As the majority of Bromsgrove is rural in nature, housing affordability is expected to get worse, as development is further distorted towards defined urban areas, whilst the need for housing in Bromsgrove continues to grow. The Draft Core Strategy addresses the issue of affordability through its affordable housing policy, proposing all new developments to have a target of 40% affordable dwellings. As the District is predominantly rural, this policy also acknowledges that affordable housing will be required in or on the edge of settlements in the Green Belt where a proven local need has been established. The Rural Renaissance policy also intends to promote affordability issues in the rural areas by suggesting suitable locations for development in regard to the proven local need. Through these policies Bromsgrove aims on meeting the demand for affordable housing provision, and as a result provides a suitable basis for increased housing allocations.

5.24 From the detailed analysis of sites within the SHLAA a total allocation of up to 4000 units would be more appropriate for the district of Bromsgrove. This would better enable Bromsgrove to meet its own identified needs. It would enable the imbalance in the local housing market to be addressed by providing greater numbers of 2 and 3 bed properties and provide a greater level of affordable housing for identified local needs. The housing market is stronger than in many surrounding districts, ensuring that additional housing is viable and deliverable. In line with PSS3, sites have been identified that are suitable, available and achievable for housing development. There would be significant economic benefits for the district with additional housing being a catalyst for the expansion of employment sites and the regeneration of the Town Centre. Additional housing in Bromsgrove targeted at the identified needs would help the RSS achieve its main objectives of urban renaissance and rural regeneration through delivering a level of housing that only meets local needs in Bromsgrove District whilst not hampering the regeneration of the MUA.

CF4 Phasing of New Development (page 78)

5.25 BDC generally agrees that the objective of ensuring that the phasing of housing development is such that it supports the regeneration of the MUAs and brings forward development on sustainable previously developed sites in advance of green field development. Although BDC would suggest Policy CF4 as currently drafted does not provide adequate guidance for the development of appropriate phasing proposals in Core Strategies at the sub-regional level.

It states that:

Levels of new house building across the Region will be phased to seek to ensure that there is, overall, an increasing level of housing provision in the period up to 2016.

This policy fails to take into consideration external pressures which may hamper delivery of this policy such as the downturn in the construction industry and the 'credit crunch'.

And furthermore it states:

In sustainable locations, sites which are on previously developed land should be phased early in the plan period and, in most circumstances, prior to the phasing of Greenfield sites.

5.26 As mentioned above this policy fails to acknowledge the potential difficulties in bringing forward development on previously developed land in a timely fashion in terms of land assembly, potential land contamination issues which can substantially delay delivery.

And further:

The development of any greenbelt sites should generally be phased late in the plan period and after further investigation as to whether they constitute the most sustainable form of development in the local area and represent exceptional circumstances.

Paragraph 6.35 of the revision fails to recognise that phasing will be driven by a wide range of infrastructure considerations not just water provision which will all need to be carefully considered to ensure that the focus where possible is on brownfield delivery.

Policy CF5: The Re-use of land and buildings for housing (page 80)

5.27 BDC broadly supports the inclusion of Policy CF5 which reflects national policy. However, it should be recognised that the implications of the Draft Revision for areas such as Bromsgrove (given SHLAA information and work on the Draft Core Strategy) is that achievement of the 60% Previously Developed Land requirement for Bromsgrove is an aspiration which in practical terms is undeliverable.

CF7 Delivering Affordable Housing (page 82)

5.28 PPS3 and the RSS Policy CF7 require Local Planning Authorities to ensure that provision of affordable housing meets the needs of both current and future occupiers. Affordable housing is one of the most critical issues in the district, so much so that housing is identified as one of Council's four main priorities in the Bromsgrove Council Plan 2008-2011. The Council intends to address the issue of affordable housing through Core Policy 16 in the Draft Core Strategy. This is another policy that would be difficult to satisfy with current allocations when analysing future population patterns.

5.29 The RSS Spatial Options paper shows the effect of projecting past trends and has shown that from 2001 to 2026 Bromsgrove will need an additional 3,269 homes in regards to population growth, and a further 4,963 in regards to increases in migration to the District. This report calculated a total of 8,232 would be needed by 2026 to provide adequate housing levels, which is considerably greater than the current allocation. However, the RSS spatial options realise this is an unrealistic target and states a new aim of 7,200, which is also someway off the 2,100 allocation. The new RSS proposals which state a reduction in households needed are particularly reliant on the SHMA reducing its migration levels from 2,400 per annum over 25 years to 1,700.

5.30 There is a concern that Bromsgrove's housing allocation is low because of the high levels of housing delivered against previous structure plan targets and the current over-supply in relation to the adopted RSS. However, a large proportion of the homes delivered in the last 10 years are large 3, 4 and 5 bedroom properties that led to high levels of in-migration from the MUA. There has been a shift in planning policy since then, meaning that areas outside the MUA such as Bromsgrove should only be catering for identified local needs. These recently built large properties do not cater for large sections of the local population, hence the requirement for an increased allocation to build more smaller properties to cater for young adults and the elderly.

5.31 In recent years Bromsgrove District Council has invested heavily in identifying the level of need for affordable housing across the district. Firstly a Housing Needs Study was completed in 2004, followed by a Strategic Housing Market Assessment in 2007 and most recently a Housing Market Assessment in 2008.

5.32 Each of these studies was 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 important details to come out of each study is that there is a significant need for affordable housing across the district.

5.33 The 2004 Housing Needs Study estimated the need for affordable housing based on the 'Basic Needs Assessment Model' (BNAM). The BNAM sets out 18 stages of analysis to produce an estimate of the annual requirement for additional affordable housing. There are 2 main analytical stages that result in a gross affordable housing requirement these are: backlog of existing need and newly arising need. The outcome of the study was that there was in 2004 a gross affordable housing requirement of around 247 units per annum across the district, if you exclude all in-migration. The current allocation of 2,100 would result in an annual rate of 105 dwellings, which would be less than half the required amount identified to meet affordable housing needs as part of the Housing Needs Survey.

5.34 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. The recent Housing Market Assessment also identified a significant need for affordable housing throughout the district. An annual target of 105 dwellings over the plan period means that the level of unmet need will continue to increase and therefore hamper the delivery of policies within the Draft Core Strategy.

5.35 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. If this is implemented against proposed RSS targets it is likely that no more 42 affordable units per annum would come forward.

5.36 A fundamental element in the Council's justification for additional housing provision is the high levels of affordable housing need identified in policy CF7 in the Revision Phase Two of the WMRSS. The Taylor Review (2008) recognises the restrictive nature of planning practices and a shortfall in the planned provision of affordable homes are having on rural villages and hamlets, often creating unsustainable communities, unaffordable for those who work there, losing jobs and services. The Council identifies how important it is to create sustainable communities (Core Policy 17) throughout the District; in the Draft Core Strategy, however, such a policy will be become increasingly difficult to deliver. To ensure settlements in the District maintain their vitality and viability it is clear that a larger housing allocation is required.

5.37 Whilst the Council accepts that it may not be able to fully meet its affordable housing needs, the enormity of the affordable housing shortfall further highlights the need for an addition to the RSS allocation. With an increase in numbers, general housing provision will also be able to reach the scale where affordable housing contributions can become more effective. The Council feels it cannot meet both its regeneration and affordable housing targets with a housing allocation that is heavily based on past trends.

5.38 During the period between 2001 and 2005, only 3.6% of Bromsgrove's new completions were affordable housing (compared with 11.2% in the total SHMA). That is merely 74 out of 2,057, which is significantly lower than the rest of the SHMA and the rest of the region. The current Regional Housing Strategy (RHS) states that Bromsgrove needs to sustain a balanced continuity with South West Birmingham markets by sustaining a range of choices. However, the same strategy gives priority to other towns in the region for development (Worcester, Warwick, Stratford and Redditch). Bromsgrove's Draft Core Strategy includes a policy regarding affordable housing whereby the District aims to deliver higher levels of affordable housing than previously, and will encourage a minimum target of 40 per cent affordable housing provision on all developments.

5.39 The neighbouring South West Birmingham area is looking to diversify significantly the current tenure mix in favour of owner occupation and full market housing, which may create a disparity between expectation and delivery (Bromsgrove Housing Market Assessment, 2008). Coupled with the small allocation of 2,100 for Bromsgrove's needs, the planned changes in tenure profile for South West Birmingham could adversely exacerbate the shortfall of affordable housing in Bromsgrove. This issue could potentially be avoided or at least minimized by greater provision being allocated. The RHS makes the following statement:

"It is important therefore that in future Bromsgrove achieves a balanced continuity with the conurbation housing markets by sustaining that range of housing choices throughout its own housing market."

However, there will be very limited opportunity to meet this requirement with such a modest allocation that will increase levels of unmet need and leave the housing market in a state of imbalance.

5.40 It is acknowledged that great increases in house building will not significantly reduce average house prices, particularly in a district that is distorted by large detached properties in areas such as Barnt Green. Glen Bramley carried out detailed studies on the impact on housing supply on house prices on 90 districts across England in his 1995 publication entitled 'Planning, The Market and Private Housebuilding'. The study showed "*that the elasticity of supply of new private housing in Britain is quite low, although far from negligible*". This study shows that whilst there are links between housing supply and house prices, a significant increase in supply would not result in a significant increase in the number of people being able to afford their own home. Simulation carried out within the study show that "*doubling one district's plan provision will raise output by an average of 9%, which will lower the districts house prices by 0.5%*". Bromsgrove's request for increased housing provision is based on the fact it would enable Bromsgrove to meet identified needs for affordable housing and smaller accommodation rather than merely expecting average house prices to fall due to increased supply.

CF 8 Delivering Mixed Communities (page 85)

5.41 As stated in Strategic Housing Market Assessment (SHMA) for the South Housing Market Area of the West Midlands (2007) Bromsgrove has one of the highest rates of growth in both terms of population and household numbers. In line with national trends, it is well established that a combination of the formation of more independent and single person households, the impact of relationship breakdown and the ageing of the population have resulted in household growth outstripping population growth. Although Bromsgrove's population is also increasing due to augmented net inward migration from the MUA and other parts of the country, arguably one of the biggest factors is the reduction in average household size. There has been a rapid growth in one-person households, which often occurs in older age groups; which adversely reduces the rate of supply from household dissolution caused by death, as people live longer and more independently.

5.42 2004-based ONS population projections identify, the older populations of Bromsgrove are particularly experiencing growth. Between 2006 and 2026 those aged 60-74 will increase by 26.5 per cent, those between 75 and 84 by 64.9 per cent, and a dramatic increase of 95.3 per cent for those above the age of 85. This extremely large population growth will see a rise in people over the age of 60, the age when incomes are likely to fall and housing and care needs begin to change. In 2006 there were approximately 22,600 people above the age of 60, which is predicted to rise to 32,300 in 2026 (an increase of 43 per cent). When compared to the Worcestershire County figures, Bromsgrove remains consistent, as over the same time frame (2006-2026) the County's population over the age of 60 will increase by 47 per cent, from 131,800 to 193,500. The neighbouring District of Redditch will also see a dramatic increase in its elderly population. In terms of quantity it will not be higher than Bromsgrove; however, the population of the age of 60 will increase by 64 per

cent, from 14,700 in 2006 to 24,100 in 2026. In contrast, the adjoining local authority of Birmingham will only experience a 15 per cent increase in its population over age of 60, from 178,900 in 2006 to 205,500 in 2026. These statistics illustrate the issue of the growing elderly population in Bromsgrove and as result will lead to more one-person households, thus increasing the demand for housing as a reduction in supply occurs.

5.43 The recent Housing Market Assessment (2008) identified that housing development should focus primarily on 2 and 3 bedroom properties, this was then emphasised within Core Policy 12 Type, Size and Tenure of Housing of the Draft Core Strategy. This would provide options for the elderly who no longer need a large family home to downsize and also give young adults the opportunity to take their first steps on the housing ladder. Providing these smaller homes would help to redress the balance in Bromsgrove's housing market where there is currently an over-supply of large family homes.

5.44 PPS3 and Policy CF8 of the RSS require Local Planning Authorities to plan for a mix of housing on the basis of different types of households that are likely to require housing over the plan period. This should have regard to current and future demographic trends; a policy that will be extremely difficult to deliver in Bromsgrove with such a modest allocation. As the population is increasing and more importantly the number of households, Bromsgrove will be unable to cater for the expected 8,000 additional households that are needed from 2006 to 2026.

5.45 In addition to the identified need there is also a hidden need. These are the people that are difficult to monitor in housing assessments as they do not place themselves on waiting lists. High house prices mean that it is not possible for the majority of young adults to purchase properties at full market value; therefore they either have to stay in the family home or move outside of the district, generally to the MUA where housing is generally more affordable. For example the average resale price of a two bedroom property is £120,000 meaning that a single person would require an income in excess of £30,000, this is significantly above the average workplace or residence based earnings in the District. If properties are not delivered for young people they will continue to leave the District, and the District will not create balanced mixed communities, thereby accentuating the rise in the average age of the population.

5.44 If the Council is not in a position where it can deliver higher levels of affordable housing to meet identified local needs, and more young people are forced to leave the District, then there are possible severe economic consequences. The regeneration of the town centre could be affected with a declining active population making the town less attractive to investors and large retailers. It is already clear from a recent survey undertaken as apart of the Town Centre Area Action Plan that over two-thirds of the population regularly shop outside of the District (the main destinations are primarily Redditch, Birmingham and Merry Hill). If this continues to happen the remaining non-food retailers may choose to leave the town centre.

5.45 There would also be consequences for local centres. If suitable housing is not provided in smaller settlements then the vitality and viability of the centres

could be severely compromised. This could lead to the closure of essential local services such as post offices and public houses. This could mean some of the remaining people become isolated and excluded from society. Naturally for those with private transport it would lead to longer and more frequent car journeys. This would result in the failure in the delivery of sustainable development one of the overarching aims of both the Core Strategy and the RSS.

5.46 There are also important consequences for local employment that need to be considered. If the working population declines further it will become increasingly difficult to diversify and expand the employment base in the District. In particular the Central Technology Belt that is supported by RSS Policy PA3; if there are only a limited number of young, skilled workers available locally, Bromsgrove Technology Park may struggle to develop further high technology industries.

5.47 The Strategic Housing Market Assessment (SHMA) highlights the fact that work place income is radically lower than residence based income. This is a particular concern for Bromsgrove as a large proportion of its residents travel to work in nearby urban areas, such as Birmingham, Redditch and Worcester. This can create issues associated with sustainability as more people travelling would in turn impact on carbon emissions, climate change and air quality. Bromsgrove's Core Policy1 Climate Change within the Core Strategy promotes development in sustainable locations, near well served public transport, which could be promoted by an increase in provision, as this would better facilitate development that can reduce energy consumption. The issue of work place income compared with residence based income has significant impacts on house prices, meaning people who work inside the District would be at a disadvantage when competing for homes with those working outside the District. This provides further evidence that local people may be forced to move out of the District to find a new home.

CF 10 Managing Housing Land Supply (page 86)

5.48 PSS3 Housing recognises that all housing sites identified should be both deliverable and developable. It is therefore reasonable to suggest that housing should be located in areas where the market is strong and demand is high. Between July and September 2006 the Strategic Housing Market Assessment for the South Housing Market Area identified that the average house price in the district of Bromsgrove was £240,867. This is one of the highest average prices across the South Housing Market Area with the average house price across the whole West Midlands region just £173,778. In the adjacent borough of Redditch over the same period in 2006 the average house price was lower still at £160,397. Whilst in the current climate, house prices today maybe a little different, the comparative price differences still exist.

5.49 The higher prices in Bromsgrove primarily exist because property in the District is in high demand. The District has many desirable characteristics for its residents including the attractive rural environment, safe communities and good transport links with the Major Urban Area (MUA). The desirability of the District has been emphasised by a net inward migration of 4,700 people between 2001 and 2006 (Housing Market Assessment, 2008). Whilst this trend of outward

migration from the MUA is not desirable it does emphasise that people want to live in the District. Furthermore, the Nathaniel Lichfield Study entitled Development Options for the West Midlands in response to the NHPAU Report suggests that for Birmingham to fulfil its role as a world city, the surrounding districts need to provide more good quality housing and that restricting supply in areas outside the city, which are clearly within Birmingham's housing market, harms the city's ability to grow to its desired potential. As previously stated, The Communities for the Future Housing Background Paper projects that the number of households will rise from 37,000 in 2006 to 45,000 in 2026. Crucially, the majority of this growth is primarily based around an increase in single person households within the district rather than inward migration. It is therefore reasonable to assume that there is a need within the district for more than 2100 homes between 2006 and 2026.

5.50 The strength of the local housing market is emphasised by the high number of completions in the district in recent years. Over the 7 years since the beginning of the RSS plan period in 2001 there have been 2831 completions. This is an average of 404 per annum. The District experienced a high level of windfall development and had no policy mechanism to control this and therefore a Managing Housing Supply SPG was introduced in July 2003 to prevent the level of housing over-supply increasing further. The District therefore has a proven track record demonstrating its ability to deliver higher levels of housing.

5.51 Whilst it is clear that there is a need for more than 2100 homes, it is crucial to consider whether there is enough land available to deliver an increased level of housing over the plan period. Such a low level of housing would be insufficient to rebalance the housing market and would not fully cater for the changing household structures in the District.

5.52 Bromsgrove District Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) in accordance with the DCLG practice guidance. The assessment gave all interested parties the opportunity to submit sites that may have potential for housing for the remaining 18 years of the plan period to 2026. To provide realistic estimates of capacity, sites have been discounted to take account of the associated infrastructure required. On sites under 2 hectares the capacity is based on 85 per cent of the land, whilst on larger sites over 2 hectares in size the percentage has been reduced to 65. Small sites below 0.4 hectares in size have not been discounted.

5.53 In most cases to provide a range of the deliverable capacity of sites we have provided a minimum and maximum figure based on the characteristics and location of the site. In some instances developers have provided indicative site layout drawings enabling a precise figure to be provided.

5.54 As Bromsgrove has a severe lack of affordable housing we have included only sites that have potential to deliver some affordable housing in accordance with the policy contained within the Draft Core Strategy.

Source	Capacity (min and max)	
Completions (06-08)	411	411
Commitments	347	347
Brownfield sites	344	373
ADR sites	2754	3136
Total	3856	4267

Table 2: Total Amount of Housing Deliverable

5.55 Within the Bromsgrove District Local Plan ADRs were identified that had potential to deliver additional growth. These sites have been tested at a local inquiry and are considered to be sustainable locations to deliver growth. It is envisaged that the majority of future growth could be delivered on ADRs.

5.56 The ADRs are located primarily around the largest settlement in the district, Bromsgrove Town. All of the settlements with ADRs have a wide range of services and essential facilities available to cater for the local population. These are the most sustainable locations within the District that have excellent bus and rail links to the MUA. This will improve further in the future with a new train station in Bromsgrove Town providing a high quality transport interchange linking the new station with the town centre and the wider Worcestershire region. The provision of additional housing around Bromsgrove may stimulate development within the town centre and boost the process of regeneration that is being delivered through an Area Action Plan. This regeneration would meet the needs of the local population and be in accordance with RSS Policy PA12B.

5.57 A number of meetings have been held with key stakeholders in the district to discuss the potential implications of building homes on the ADRs. These include meetings with health and education providers, statutory undertakers, the Highways Agency and emergency services such as the police. The outcomes of these meeting were positive and no 'showstoppers' were identified to delivering increased levels of growth within the district.

5.58 One of the unique characteristics of Bromsgrove is the fact that 91% of the district is located within the Green Belt. The use of the ADRs means that Green Belt boundaries would not need to change and the strategic gap between Birmingham and Redditch would be retained whilst protecting the attractive rural landscapes of the district.

5.59 Table 2 identifies that there has been sufficient land identified to deliver between 3856 and 4267 dwellings over the plan period from 2006-2026. As 2 years of the plan period have already been completed it was deemed crucial to include all completions during those 2 years and all existing commitments. There is potential for a further 150 homes to be delivered through the expansion of the Norton Farm site. Naturally this would lead to the alteration of Green Belt boundaries but there is potential for significant planning gain. It has been proposed that a relief road would be built from the roundabout at the Western End of Barnsley Hall Road that runs through the former Barnsley Hall Hospital site and Norton Farm to join Birmingham Road /A38. This proposal could be linked with another new road which would be routed through the Perryfields road ADRs. It has been identified that these two schemes would significantly reduce the amount of through traffic in Bromsgrove Town Centre, an area that is currently heavily congested. The remainder of the Barnsley Hall Hospital site

would be turned into a country park that would provide significant benefits for the local population by providing opportunities for outdoor recreation.

5.60 In addition it is also highly likely that windfall sites would come forward for development through the plan period that have yet to be identified. In particular the regeneration of the town centre is likely to lead to a number of small schemes coming forward. To put this in context since 2001 a total of 1778 dwellings have been granted planning permission for windfall development, this is an average of 254 per annum. This figure would be significantly higher if the housing moratorium had not been introduced in 2003.

5.61 A significant number of Green Belt sites were considered within the SHLAA. The sites in the most sustainable and least strategically sensitive locations could deliver in excess of a further 2000 homes if required in the later end of the plan period.

5.62 Bearing in mind the capacities mentioned, the desire to retain Green Belt boundaries and the importance of meeting only local needs we believe that an allocation of up to 4,000 homes would be more appropriate for the district of Bromsgrove. This would give the authority the opportunity to begin to redress the imbalance in the housing market and deliver a higher number of affordable units for identified local needs.

6 PROSPERITY FOR ALL

PA1 Prosperity For All (Page 91)

6.1 BDC supports the broad principles set out in this policy. However, BDC and RBC assume that Criterion C i) of Policy PA1 is suggesting meeting the economic needs of the MUAs beyond the MUAs in SSDs. If this assumption is correct, this in effect means 'economic overspill' for SSDs in much the same way as 'housing overspill' (Paragraphs 3.61 and 3.62 in relation to residential growth). If this is so, BDC and RBC are most concerned that this will place further pressure on the sensitive Green Belt areas around Redditch Borough and may add to the long term implications for Bromsgrove.

6.2 BDC fully supports the inclusions new sub paragraph C (ii) which promotes the location of employment outside the MUA's, where it can help create more sustainable communities by generally providing a better balance between new housing and new employment and limit out commuting. However, it is suggested that the reference to meeting 'at least one' of the criteria in Section C should be deleted as it would be more appropriate to consider performance against the full range of criterion.

6.3 However, in relation to policy wording in sub paragraph D) *Any development proposed on the edge of the MUA's or other Greenfield sites should meet the following criteria;*

The development respects the natural environment, built environment and historic heritage in accordance with policies QE 1-9

BDC considers that that this principle has not been applied to the Redditch growth scenario; that it should not be restricted to only employment growth but should also be applied to housing growth, and that it should be strictly adhered

to in relation to future growth arising for example from the findings of the NLP study.

PA3 High Technology Corridors (Page 93)

6.4 BDC welcomes and supports this policy. Given that policy PA3 (criteria B) advocates:

In land-use terms, new developments within the HTCs should be focused on the MUAs and at specific nodes shown on the Prosperity for All Diagram.

Bromsgrove is identified as one such node but the significance of this seems to have been overlooked.

6.5 An increase in housing provision in the district would undoubtedly require an increased level of employment development. The 2008 Employment Land Review identifies, for example, that a further 4,000 dwellings will generate an additional requirement for 2 hectares of construction industry related land and an estimated extra 2 hectares of land for office use. Additional housing growth would support development on the Central Technology Belt, in particular at the Bromsgrove Technology Park, providing local jobs for local people. This would help the delivery of RSS Policy PA3 'High Technology Corridors'. Providing high quality housing for identified needs in Bromsgrove may encourage further investment in the Technology Park leading to a wider range of high technology firms investing in the local area. Additional housing development would also be a catalyst for development at other employment sites such as Harris and Saxon Business parks.

PA6 A Employment Land Provision (page 96) goes on to state that:

ii) the need to ensure that employment opportunities are accessible to areas of significant new housing development

iii) the strategic priority given to Regeneration Zones and High Technology Corridors in meeting employment needs within the Region

6.6 BDC consider that insufficient emphasis has been placed on the significance of Bromsgrove's position within the HTC. Redditch is not located within the HTC. On the grounds of sustainability, a balance needs to be struck between employment and housing provision. If new development is focussed on the HTC in Bromsgrove this should be balanced with an equivalent and proportionate allocation of accessible new housing. Therefore, on the above grounds there is a potential inherent conflict in the case of Bromsgrove and this justifies an increased housing allocation for the District.

Moreover criteria iv states:

the potential for the maximum use of recycled land for employment purposes to meet these needs but to recognise that the use of some Greenfield land may be required where all other alternatives have been considered.

6.7 BDC consider that more emphasis should be placed on the final remark that *all other alternatives* must be considered i.e. land within Bromsgrove

District in sustainable locations within or adjacent to the existing settlements rather than Greenfield locations adjacent to the boundary of Redditch.

6.8 RSS Policy PA6A sets an indicative long-term requirement of 21 hectares of Employment for the district. Council's 2008 Employment Land Availability document identifies that there are 29.8 hectares of employment land commitments. The majority of these commitments are at Bromsgrove Technology Park, Buntsford Gate Business Park, Wythall Green Business Park and Saxon and Harris Business Park. The majority of these sites are within, or within easy reach of, Bromsgrove Town where the majority of housing growth would be located. In addition a further 7.89 hectares of employment land could be allocated on the remaining part of Perryfields ADR BROM 5B (the other half of BROM5B has been used in the housing calculations).

6.9 It is clear that additional housing growth could be a catalyst for development at existing business parks in the district and potentially reduce the numbers of people commuting to the MUA for work on a daily balance. There is sufficient capacity on existing employment sites and potentially on part of the Perryfields Road ADR to cater for an increase in housing without altering Green Belt boundaries.

PA6 B Protection of Employment Land and Premises (page 100)

6.10 BDC welcomes the continued inclusion of Policy PA6B which seeks to protect employment land from alternative uses. The objectives of Policy PA6B are closely incorporated into Policy CP8 Distribution of New Employment Development in Bromsgrove's Draft Core Strategy. It should be noted that this policy places greater emphasis on proposals for alternative use of employment sites having to demonstrate that the site or premises are no longer viable for employment or mixed use, has been actively marketed for employment uses, accompanied by full and detailed evidence, there would be net improvement in amenity and the proposal would not have an unacceptable adverse impact upon the quality and quantity of employment land within the local area.

PA12B Non-Strategic Centres (page 113)

6.11 BDC fully supports the introduction of this policy and recognises the important role Bromsgrove Town Centre has in the lives of local people. An Area Action Plan is being developed for the Town Centre to regenerate and enhance its function and role. However, BDC consider that the regeneration would be compromised by the low housing allocation for the district as identified within Policy CF3. Such a low level of housing would mean that the needs of local residents would not be met; resulting in people being forced to leave the district. If the economically active section of the population leave the district it could stifle the local economy and act as a deterrent for major retailers and other developers to invest in the Town Centre. This could lead to the creation of a town centre that does not fully meet the day-to-day retail needs of the local population. It is essential that the regeneration of the town centre is not impeded, otherwise even greater numbers of local people will choose to shop outside the district in locations such as Birmingham and Redditch.

PA14 Economic Development and the Rural Economy (page 118)

Criteria A states:

Development plans and other strategies should support the sustainable diversification and development of the rural economy through the growth of existing businesses and the creation of new enterprise. This should be undertaken in ways that meet local employment needs, maintain viable and Sustainable local communities, conserve and enhance environmental assets and respect local character and distinctiveness.

and PA15 Agriculture and Farm Diversification (page 119) states:

Development plans and other strategies should recognise the continuing importance of the agricultural sector in the Region. Development plans should include positive policies to promote agriculture and farm diversification through the development of innovative business schemes including sustainable tourism, environmentally sustainable farming, forestry (QE8) and land management, new and innovative crops, on-farm processing adding value to existing production and the promotion of local marketing and supply chains. Any development should be appropriate in scale and nature to the environment and character of the locality.

6.12 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.

7 QUALITY OF THE ENVIRONMENT

QE1 Conserving and Enhancing the Environment (page 123)

7.1 Sub paragraph iv) states that local authorities and other agencies in their plans, policies and proposals should:

protect and enhance the distinctive character of different parts of the Region as recognised by the natural and character areas (Figure 6) and associated local landscape character assessments, and through historic landscape characterisation.

BDC welcomes and supports the principles set out in this policy

QE3 Creating a high quality built environment for all

7.2 BDC welcomes and supports the principles set out in this policy, and in particular paragraph B i), as we consider the concept of local distinctiveness as very important in preserving the local character of the District.

QE4 Greenery, Urban Greenspace and Public Spaces(page 125).

7.3 BDC welcomes and supports the principles set out in this policy. However, if Redditch growth results in development of land to the north of Redditch, this could result in the green corridor of Arrow Valley being abruptly severed. Furthermore, as the land to the north of Redditch is of unknown biodiversity value status, this will require additional examination potentially as part of the WMRSS Phase 3 Revision. Worcestershire County Council also concur in their response to the WMRSS that *“the area surrounding Redditch*

contains a considerable old grassland resource that is of unknown biodiversity status and requires further investigation”.

QE 5 Protection and Enhancement of the Historic Environment (Page 127)

Criteria B recognises:

Of particular historic significance to the West Midlands are:

i) the historic rural landscapes and their settlement patterns

7.5 BDC welcomes and strongly supports the principles set out in this policy, and notably the recognition in Part B of the historic significance of market towns (Bii) and (B v) the historic transport network.

7.6 **RSS Paragraph 8.21 c** BDC is concerned that the Government has not recognised the costs of providing adequate resources to carry out this policy, and especially the extra workload that will fall on local authorities following the implementation of the Heritage Protection Review. In particular the shortage of professionally qualified staff requires to be addressed.

QE6 The Conservation, Enhancement and Restoration of the Regions Landscape

7.7 BDC welcome and support this policy but is concerned that substantial tracts of its landscape will be adversely affected due to the implications of proposals for Redditch growth within the Districts Green Belt.

7.8 In PPS7, the Government recognises and accepts that there are areas of landscape outside nationally designated areas that are particularly highly valued locally and by utilising tools such as landscape character assessment (LCA), sufficient protection for these areas should be given without the need for rigid local designations. The proposed Redditch growth would potentially result in the loss of Areas of Great Landscape Value, Landscape Protection Areas (as identified within the current Bromsgrove District Local Plan) or land adjacent to these areas, thereby potentially affecting their setting. The likely impact on the AGLV or LPA is however difficult to assess as these concepts have been superseded by the use of LCA. LCA is an objective tool for differentiating and classifying landscapes which recognises that each landscape type has equal merit in contributing to local distinctiveness and sense of place. As the majority of the Worcestershire landscape falls in the medium-high sensitivity category, there will certainly be a measurable negative impact on landscape character arising from development proposals. Although this landscape can be found elsewhere in Worcestershire, it is attractive and has high amenity value to residents and visitors. It should therefore be protected against development as development of this size is unlikely to be reversible in the future.

QE9 The Water Environment A vii

7.9 BDC welcomes and supports this policy. *Development and Flood Risk* (page 135)

Paragraph 8.42 refers to PPG25 Development and Flood Risk. It is assumed that this is a typing error as PPS25 was released on 7th December 2006 12 months before the RSS revision was submitted.

EN1 Energy Generation and 2 Energy Conservation (page 137)

7.10 BDC considers that these policies appear to duplicate/overlap with Policies SR1 and 2. However BDC strongly supports all efforts to promote the use and development of renewable energy. With regards to iii), it is essential that any such developments in the proximity of the assets listed are considered very carefully as the possibility of a negative impact is high. Although such developments are not impossible as demonstrated by a number of National Trust schemes.

Part 3 Minerals policies (page 139)

Minerals are dealt with at County level and therefore BDC and RBC consider it appropriate to endorse the submission made by Worcestershire County Council to the WMRSS Phase Two Revision - Draft Preferred Option consultation regarding these matters.

The relevant extracts from the Worcestershire County Council Cabinet endorsed report and its accompanying appendices are as follows:

WCC Cabinet Report

“Chapter Eight : Quality of the Environment

In overall terms the Waste Strategy set out in the draft revision is supported, notwithstanding the comments below and the recommendations for policy wording changes identified in Appendix 2. Waste is an important issue in the emerging LAA and the Local Government family will need to work closely together to address concerns about waste issues, (especially in relation to municipal waste). In this respect the Waste Strategy within the draft revision represents a good starting point.

The Revision sets targets for the minimum capacity of the total facilities needed to process both municipal waste and commercial and industrial waste over the life of the RSS, for the maximum amounts of waste which should be landfilled and the dates (at 5 yearly intervals) by which they should be met. A calculation of the “Treatment Gap” between what capacity currently exists and would be needed is included. These targets are useful indications of the direction of travel but officers will be updating the data for municipal waste in the review of the Joint Municipal Waste Management Strategy and anticipate that more capacity may be needed to manage municipal waste in order to meet Landfill Allowance Trading Scheme (LATS) targets. The Treatment Gap will be considered through the preparation of the Waste Core Strategy.

It is accepted that in managing waste facilities there will be a need for a pattern of sites and areas suitable for new or enhanced waste facilities to be identified and that it is appropriate for such facilities to be in close proximity to

Settlements of Significant Development or the other large settlements identified within the draft revision, namely Worcester, Bromsgrove, Droitwich, Kidderminster and Redditch. However, the wording of Policy W3 is currently unacceptable to the Council insofar as it implies that provision of facilities for the management of waste should be made in **all** of those locations. This is a decision more appropriately left to the Waste Core Strategy and a change to the policy wording should be sought.

The draft revision sets out that in considering the provision of waste management facilities to allocate specific waste streams or technologies to particular locations would stifle opportunity for innovation in managing the waste resource and therefore sites which are identified in LDDs should be capable of accommodating a variety of technologies and size of facility. This approach to waste management provision is strongly supported.

Additionally, the draft revision sets out that there is no evidence base to support the allocation of facilities to manage particular waste streams or apply particular technologies to any broad location and that by being too rigid and specific in allocating specific technologies to sites the WMRSS could have an adverse effect on the introduction of new development in resource management, innovation and enterprise. This stance and approach to strategy within the WMRSS is again strongly supported.”

Appendix 1

“Chapter 8 : Quality of the Environment

Within the Quality of the Environment Chapter, a range of new policies in relation to Waste Management provision have been introduced. These policies identify the need to manage waste from all sources including commercial and industrial; construction and demolition, agricultural activities as well as municipal waste. In addition, new policies have identified the broad locations for waste management facilities and the amount of provision to be made by each Waste Planning Authority over the duration of the WMRSS. The key elements of the draft revision as they impact upon Worcestershire are set out below.

(i) Waste Strategy

When it is approved by the Secretary of State the revised WMRSS will become the Regional Waste Strategy for the West Midlands. The WMRSS proposes to deliver sustainable development through driving waste management up the waste hierarchy, addressing waste as a resource and looking to disposal as a last option. The waste strategy provides a framework in which communities take more responsibility for their own waste by seeking to be self-sufficient on a “net” basis within the region and by requiring each Waste Planning Authority to manage an equivalent tonnage of waste arising within its boundary. To this end Policy W1 of the revision requires each Waste Planning Authority to allocate enough land in its LDDs to manage the equivalent tonnage of waste to that arising from all waste streams within its boundary taking into account the waste hierarchy.

(ii) Targets for Waste Management in the Region

Based on a series of background studies the revised WMRSS provides a distribution of waste tonnage requiring management; a pattern of waste management facilities of national, regional or sub regional significance; and

identifies the tonnages of waste requiring management for both the commercial and industrial and the municipal waste sectors. The revision apportions these tonnages by Waste Planning Authority area. The revision adopts national targets to indicate the “direction of travel” to minimise waste production and to provide new facilities to reprocess and manage waste in the West Midlands. The revision takes into account the proposed housing figures set out in the WMRSS to help calculate municipal waste targets and a higher level of commercial and industrial waste being managed higher up the waste hierarchy than that set out in the national waste strategy in order to establish targets for the region. Table 7 below sets out the proposed targets for Worcestershire, which are in 5-year bands. Policy W2 requires each Waste Planning Authority, through LDDs, to plan for a minimum provision of new facilities to reprocess and manage waste in accordance with the tonnages.

Table 7
Minimum Waste Diversion for Municipal Waste and Commercial and Industrial Waste for Worcestershire (tonnes)
 [Extract from Tables 5 and 6, Draft Revision – page 149]

	2005/06		2010/11		2015/16		2020/21		2025/26	
	Min Diversion from Landfill	Max Landfill	Min Diversion from Landfill	Max Landfill	Min Diversion from Landfill	Max Landfill	Min Diversion from Landfill	Max Landfill	Min Diversion from Landfill	Max Landfill
Municipal Waste	78,000	234,000	160,000	181,000	212,000	143,000	242,000	127,000	254,000	130,000
Commercial & Industrial Waste	441,000	320,000	503,000	271,000	627,000	268,000	858,000	286,000	858,000	286,000

(iii) The Need for Waste Management Facilities by Sub Region

The RPB has considered the need for additional waste management capacity of regional and sub-regional significance and the need to reflect any requirements for waste management facilities identified nationally. The revision does not set out that there is a need to make provision for facilities to meet a national need. However it does identify that there are a number of authorities where a significant shortfall in facilities to manage an equivalent tonnage of waste to that arising in their areas currently exists (see Table 8 below).

Table 8
Gap Analysis by Waste Planning Authority
 [Draft Revision, page 151][million tonnes]

Projection Option - C&I High –MSW 3	Treatment Capacity Required	Projected Throughput + Quantified Expansion	Treatment Gap
Birmingham	1.81	1.27	0.54
Coventry	0.62	0.36	0.26

Shropshire	0.61	0.45	0.15
Staffordshire & Stoke-on-Trent	2.39	1.13	1.25
Borough of Telford & Wrekin	0.54	0.05	0.49
Warwickshire	1.04	0.45	0.60
Worcestershire	1.22	0.31	0.91

Policy W3 of the revision requires those authorities which have a “treatment gap” in facilities to manage waste to make provision in their LDDs for a pattern of sites and areas suitable for new or enhanced waste management facilities in, or in close proximity to, the MUAs, Settlements of Significant Development and other large settlements identified on the “Broad Locations for Waste Management Facilities” Diagram. Within Worcestershire this includes Worcester, Bromsgrove, Droitwich, Kidderminster and Redditch. It is considered that in addition to meeting local needs that these locations are well placed to accommodate facilities of a regional and or sub-regional scale to reprocess, reuse, recycle or recover value from waste, allowing for the requirements of different technologies.

The revision sets out that to allocate specific waste streams or technologies to particular locations would stifle the opportunity for innovation in managing waste as a resource. As such the sites identified in LDDs should be capable of accommodating a variety of technologies and size of facility.

(iv) Criteria for the Location of Waste Management Facilities

Given the need for a major investment programme in new waste management facilities the revision sets out that it is equally important to safeguard the sites of existing waste management facilities (taking into account environmental and amenity considerations) (Policy W4). The revision also sets out in Policy W5 the criteria to be considered by Waste Planning Authorities when identifying additional sites to meet capacity needs.

The revision also acknowledges that the management of waste in rural areas can pose particular problems due to the dispersed nature of settlements. Policy W6 accordingly requires all Waste Planning Authorities outside of the MUAs to identify sites for the treatment and management of waste arising from areas of low population and scattered communities. Quite often the need to locate facilities away from “sensitive receptors” requires facilities to be located in open countryside and sometimes within the Green Belt if the facilities are required to be close to or serve the MUAs or major settlements. Policy W7 sets out the criteria for when such facilities could be permitted.

(v) Hazardous Waste

The West Midlands region, although traditionally a more industrialised region than elsewhere, does not proportionately generate more hazardous waste than elsewhere. Since the redefinition of hazardous waste the amounts arising from construction and demolition projects has reduced significantly and more contaminated soil is being treated “in situ” rather than being landfilled. The redevelopment of brownfield sites in the region will produce some waste which cannot be recycled because of its hazardous nature and it will need to be

treated at specialist sites. There are currently two regionally significant facilities reprocessing hazardous waste already located in the Black Country and on the basis of current information they are well placed to manage the region's hazardous waste and could be expanded if required.

Policy W8 of the revision sets out policy in terms of safeguarding existing sites for the treatment and management of hazardous waste. However, all LDDs are required to give specific priority to identifying new sites for facilities to store, treat and recycle soils and construction and demolition waste, including through maximising "on site" recycling and the promotion of "urban quarries".

Concerning the need for new landfill facilities the revision considers that, depending upon the success in diverting waste from landfill, no additional landfill is necessary until between 2016-2022. The revision does not propose to require individual Waste Planning Authorities to identify any new landfill sites within LDDs. Policy W11 requires that LDDs should restrict the granting of planning permission for new sites for landfill unless it is for proposals required to meet specific local circumstances or necessary to restore deposited or degraded land (including mineral workings)."

Appendix 2

Chapter 8: Quality of the Environment

Policy W2

Concerns in relation to the accuracy of the tonnages of waste to be managed are covered in the main report. It is considered that more work will be needed to be undertaken to check and update the data contained in tables 5 and 6 of the draft revision document in relation to both municipal waste and commercial and industrial waste. Once this has been completed the resultant "treatment gap" set out in table 7 may need to be reconsidered. At the same time it will be important for the RSS to make clear which figures are to be used as guidelines when preparing detailed Waste Core Strategies - tonnages or the "treatment gap".

Policy W3

Concerns in relation to the wording of the policy in relation to identifying a pattern of sites for the provision of waste management facilities are set out in the main report."

TRANSPORT AND ACCESSIBILITY (Page 163)

As Transport and Accessibility has many functions at a County-level, BDC and RBC consider it appropriate to endorse the submission made by Worcestershire County Council to the WMRSS Phase Two Revision - Draft Preferred Option consultation regarding these matters as follows:

The relevant extracts from the Worcestershire County Council Cabinet endorsed report and its accompanying appendices are as follows:

Cabinet Report

"Chapter Nine : Transport and Accessibility

The revised policies within the Transport and Accessibility chapter of the WMRSS focus on measures to improve accessibility and mobility and the

promotion of sustainable transport. These aims are very much supported and the policy framework within the draft revision provides a good strategic context for detailed approaches to park and ride, parking standards and demand management to be taken forward at the local level. That said there are clearly wider transportation and accessibility issues in relation to infrastructure (which have been addressed earlier in the report) and which will ultimately need to be reflected within Policy T12 (Priorities for Investment) and within the overall implementation plan.”

Appendix 1

“Chapter 9 : Transport and Accessibility

Revisions to the Transport and Accessibility Chapter have focussed on four of the Regional Transport Strategy (RTS) policies – Strategic Park and Ride, Car Parking Standards, Demand Management and Airports. In addition, Policy T12, Transport Priorities for Investment, has been updated to reflect factual changes and the spatial and infrastructure implications emerging from new policies within the Communities for the Future and Prosperity for All Chapters.

(i) Strategic Park and Ride

Providing people with sustainable travel alternatives is central to the RTS and Park and Ride can provide an attractive alternative to the car particularly where the journey is to a centre. The revision sets out that with continued growth in rail usage there is a need to improve and expand the region’s existing park and ride sites and to provide new opportunities across the network. The majority of existing park and ride facilities within the region are on the rail network, however there are an increasing number of bus-based sites providing a local service.

Policy T6 sets out that locations for strategic park and ride should be considered against the criteria of congestion benefits; frequency, capacity and quality of the public transport offer; environmental, design and traffic impact; potential for interchange with other public transport services; and implications for the wider public transport network. The policy includes the already identified strategic location of Worcester Parkway, but also identifies potential additional locations within the region, including Bromsgrove.

(ii) Parking Standards

The WMRSS revision for car parking policy is only in relation to maximum standards for new development. This is covered by parts A and B of Policy T7. These sections set out that authorities should work together on a sub-regional basis to develop maximum standards for car parking associated with new developments which will support sustainable economic growth whilst minimising the demand for travel by car and reduce congestion. The policy also sets out that in developing car parking standards local authorities should consider the need for more restricted standards within the congested areas as part of a sustainable strategy to manage travel demand; should assess the need to make the most effective use of available land; should maintain and enhance the economic viability of town and city centres; and should take care to avoid deterring investment in town and city centres.

(iii) Demand Management

The revision sets out that the demand for travel is such that it will not be possible to meet it in full, even with increased investment in infrastructure. The

current WMRSS contains a policy (T8) on demand management. This has been amended by the revision, primarily in relation to Part C of the policy. This sets out that whilst being encouraged to bring forward local charging schemes in the more congested areas, when doing so local authorities should take into account the impacts on the environment (including sustainability and climate change); the economy (local and regional); community (residents and businesses); urban and rural renaissance; and capacity (pressure on other parts of the network including roads and public transport).

(iv) Airports

Policy T11 of the revision sets out the roles of Birmingham International Airport (BIA), Coventry Airport and Wolverhampton Business Airport. It sets out that BIA will continue to be developed at the region's principal passenger airport and is expected to accommodate future growth to serve more distant international destinations. This will require an extension of the main runway and associated facilities and, beyond the period of the WMRSS, may require a second shorter runway. The policy requires BIA to achieve a minimum modal share by public transport (passengers, employees and visitors) of 25% by 2012 and 30% by 2020.

The further development of Coventry and Wolverhampton Business Airports in the region should be in accordance with Air Transport White Paper and should complement the role of BIA as the region's principal passenger airport."

Appendix 2

"Chapter 9 : Transport and Accessibility

Paragraph 9.36

Should the proposed wording changes to location descriptions in the Spatial Diagram be taken forward there will be a need for consistency within the transport chapter.

Paragraph 9.72

Should the wording of the text under the first bullet point be reconsidered? Park and Ride schemes should relieve pressure on congested areas. However taken literally the text, which currently suggests developing sites '*adjacent to congested sections of the motorway network*' could lead to increased congestion by initially increasing road borne traffic. Would wording indicating that Park and Rides Schemes should be developed in locations '*suitable to help reduce congestion on the congested sections of the motorway network....*' be better?

Policy T6

It is assumed that all the locations set out in part (C) of the policy as potential Park and Ride locations have been brought forward via the application of the criteria set out in part (A) of the policy? It is also unclear whether there is any priority in order (from a regional need perspective) as to when to bring them on stream? These points could be clarified within the supporting text to the policy."

8 Bromsgrove District Councils comments in relation to

T5 Public Transport and T6 Strategic Park and Ride (page 177)

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

8.2 BDC does not consider that Bromsgrove's potential for new growth in terms of its key strategic position on the PRN i.e. at the intersection of the M42 and M5 on the "motorway box" and its designation as a node in the Central Technology Belt is fully acknowledged within the WMRSS. Therefore the full economic potential of the District is unlikely to be realized, contrary to the aims of the Spatial Strategy for the Development of the West Midlands as outlined above.

Policy T6 (page 180)

8.3 It is assumed that all the locations set out in part (C) of the policy as potential Park and Ride locations have been brought forward via the application of the criteria set out in part (A) of the policy? It is also unclear whether there is any priority in order (from a regional need perspective) as to when to bring them on stream? These points could be clarified within the supporting text to the policy.