

Bromsgrove District Council's formal response to the Nathaniel Lichfield and Partners (NLP) Report into Development of Options for the West Midlands RSS in Response to the NHPAU

The following report is Bromsgrove District Council's formal response to the NLP Study. The study should be read in conjunction with the District Council's response to the RSS phase 2 revision preferred option consultation.

The report has been split in 2 sections, Section 1 responds to the key findings of the NLP study and section 2 looks in more detail at the specific section of the report dealing with Bromsgrove District.

Section 1 Key findings

Bromsgrove District Council (BDC) have made the following observations on the findings of the NLP study

i. There is scope to identify additional land for housing in the region;

BDC does not accept this finding has any particular weight as it is inevitable that land can be found for housing, although it must be done with full consideration of all environmental, social and economic policy considerations, and through the RSS review process. As a district where 91% of the land is allocated green belt, which serves a strategic function as identified in Para 1.5 of PPG2, the planning merits of land release will have to be fully assessed through a strategic green belt review, before suggesting with any conviction whether or not the district should be allocated extra development. Issues such as the coalescence of specific settlements other than Birmingham and Solihull appear to have been given very little regard in this report. No consideration is given to the likely coalescence of settlements in Bromsgrove District should higher levels of housing growth be focussed on the Birmingham and Redditch borders.

The environmental consideration throughout the report focuses on the statutorily protected sites, and no real consideration is given to more locally significant environmental constraints any potential growth areas may offer, this cannot be overlooked and growth cannot be apportioned in any great detail until all the full effects have been evaluated.

ii. Additional housing need not harm achievement of Urban Renaissance;

By simply stating that there is no way of measuring urban renaissance and therefore allowing additional development will not harm it, is a view not wholly shared by BDC. The Council views urban renaissance as bringing together a wide range of social environmental and economic factors which provide opportunities for people to want to live, work, and invest in the MUAs.

BDC does not believe that this immeasurable urban renaissance is justification for directing high levels of additional growth to locations outside the MUA without detailed analysis of the local implications. The principle of urban renaissance is one which is a clear objective of the current RSS and one which should not be significantly eroded through the findings of this report. Additional higher levels of housing was considered at the spatial options stage of the RSS revision and was not included in the preferred option, and as such para 6.2 of the RSS states the *“excessive development on greenfield land outside the MUAs could fundamentally undermine the process of urban renaissance”*

iii. There is no evidence that increased housing supply outside the Major Urban Areas (MUAs) will reduce housing supply within them;

iv. There is no evidence that increasing housing supply outside the MUAs increases out-migration;

BDC questions these notions that by simply stating there is no evidence that housing outside the MUA will harm housing supply within them or increase out migration, is a strong justification for allowing higher levels of development to take place in places outside the MUA. BDC agree with the conclusion that the level of housing supply is a factor in peoples housing choice but other issues such as quality of life, employment, transport, and schools provision also play a significant part in the decisions taken in where people live.

These quality of life factors have led to high demand in Bromsgrove District for new housing which has been largely populated by people moving in from outside of the district, predominately the MUA. There is nothing to suggest that this pattern would not continue if more large scale development was focussed on the district.

The Bromsgrove housing market assessment concludes that over the last 5 years the district has gained over 6300 people from the conurbation which coincides with the completions of significant levels of new housing. Therefore, BDC questions whether or not there is any evidence to suggest that providing housing outside the MUA increases out migration.

v. There may be limits on how far it is possible to increase housing supply within the MUAs;

Whilst there will undoubtedly be issues and costs associated with delivering development on brownfield sites within the MUA, as stated above, Para 6.2 of the RSS maintains the position that excessive levels of development outside the MUA could harm the policy approach of urban renaissance. The release of significant levels of Greenfield sites could lead to developers' cherry picking these potentially easier to deliver sites, in favour of more difficult and costly sites within the MUA. If this process is allowed to happen through adopting the levels

and locations of growth as suggested by NLP's study, the principle of urban renaissance would be further eroded, and questions would have to be asked as to whether the review mechanism is the correct place for such a substantial shift in policy direction.

vi In some locations there are increased risks that additional supply could harm fragile markets and undermine housing market renewal, but could be overcome by careful phasing;

Bromsgrove District Council has no specific view on this aspect of the study but, understands and supports the notion that additional allocations in sensitive regeneration areas such as the pathfinders should be carefully considered, in order not to undermine the progress already being made on the areas.

vii Additional housing can support economic growth;

It is not disputed that additional housing can support additional economic growth, although the report does not consider the range and scale of land required for new employment uses to complement housing over and above that currently being proposed by the preferred option RSS. Similarly the report does not seem to consider in any great detail the requirement for other essential community facilities that the various levels of housing would need. The full implications of the housing proposals put forward in the NLP study cannot be assessed until the full requirements are known for other essential services. The funding of the services has also not been considered, and therefore the proposals carry a great risk of non delivery, if the correct funding mechanisms cannot be put in place to deliver key physical and community infrastructure.

viii. Birmingham needs more good quality housing in the City and its immediate hinterland to support its global role;

Bromsgrove District Council as a location in Birmingham's hinterland would again stress that a key aim of the RSS is facilitating the urban renaissance of the MUA. BDC has attracted significant levels of out migration from the MUA historically and whilst it is accepted that this trend is particularly hard to reverse, to encourage significant new growth over and above any justified need would not only encourage this movement of people out of the MUA, but also further undermine both the urban and rural renaissance objectives of the existing RSS.

ix. Additional housing growth can help address genuine affordability problems and meet housing needs;

The principle of simply increasing supply in an attempt to tackle affordability is one which has been much debated. Bromsgrove District Council has throughout the RSS revision process highlighted its concerns with the level of housing being associated directly with the district. The Council believes the current allocation of

2100 units will limit the districts ability to address the significant affordable housing supply problems within Bromsgrove. It is considered that allocating significant levels of new development to the district will not in itself address the issue of general affordability for open market housing. The high demand for housing in Bromsgrove could mean this approach would simply flood the market with housing, which is largely only available for affluent migrants from other areas of the midlands / country, who need to be close to Birmingham for employment purposes, but would prefer to live in the rural setting that Bromsgrove can offer. The impact of these migrants would be to maintain high houses prices, as across the district the demand would still be high resulting in the general market affordability remaining out of reach for many local residents.

The Council consider that a slightly larger allocation than currently being directed at Bromsgrove by the RSS revision, alongside a policy approach of higher levels of onsite affordable housing provision, and a higher percentage of smaller dwellings, would be a more successful and sustainable approach to addressing the affordable housing need in Bromsgrove.

x. Additional housing growth can support rural renaissance and support RSS objectives through regeneration;

Providing housing in rural locations can undoubtedly help support maintain or introduce vitality in rural settlements. The need to provide rural housing needs to be carefully balanced with all other policy considerations such as green belts, and other environmental and landscape classifications. BDC are concerned about the effects of large scale residential development on existing rural settlements. As mentioned above the level of development being suggested could mean the coalescence of villages within Bromsgrove into Birmingham and Redditch. The impacts of the new developments on those settlements which are currently not under threat of coalescence is also of concern. The new developments could act as a draw for people away from these villages into new developments reducing the vitality of villages, including deterioration in local services leading to polarisation of communities and social exclusion. Or alternatively if the correct levels of physical and social infrastructure are not provided to adequately serve these new developments, an undue strain could be placed upon these existing services causing significant negative effects for the current residents.

xi. Additional housing growth is likely to require the review of Green Belt but this is consistent with RSS objectives if it results in sustainable development and regeneration. There are also opportunities to increase coverage of Green Belt;

The RSS preferred option has indicated that a review of the green belt may be required in order to meet the housing needs up to 2026. This critical change of

direction in how the RSS is treating the green belt has not been approved. If accepted by the panel on the basis of the NLP study, it should be for the local authorities to determine where green belt boundaries are altered through detailed planning at a local level, which fully considers all the implications of surrendering green belt land.

xii. New settlements are a potential form of development that could meet requirements in the right locations and if the delivery capability is put in place;

BDC has no view on this finding, although notes that the current Eco town proposals have met with significant opposition and questions how deliverable entirely new settlements will be in the period up to 2026.

xiii. Transport issues are not a fundamental barrier to delivering more housing although investment in public transport alongside highway improvements will be needed in some locations;

BDC has concerns about the level of detail and importance placed on the provision of transport infrastructure. As with much of the consideration of infrastructure issues throughout the report, no real review of the possible funding for such schemes has been carried out, and therefore no real assessment of the likelihood of actually delivering the transport infrastructure required can be included.

The likelihood of delivering the transport infrastructure required to facilitate the preferred option of the RSS, is one which has been questioned throughout the revision process. To suggest that there are no fundamental barriers to providing even further amounts of growth appears to be an unfounded conclusion, especially when this report purely deals with housing, and does not give any consideration to the further infrastructure required to help deliver employment, retail, or any other land use.

xiv. Although there are localised hydrology and other issues to resolve there is no evidence that these cannot be addressed through investment in additional capacity or consideration of specific locations in Core Strategies;

As with above the lack of any real evidence does not justify the assumption that potentially significant issues can simply be overcome through investment at the local level. The report provides no evidence of where this investment will come from. The current economic climate is going to place much higher demands on the various funding streams that exist. Without considerably more money becoming available, BDC question the notion that hydrology and other localised issues can be addressed through investment and Core Strategies.

xv. The market downturn means the currently envisaged trajectory of housing will change but there is no fundamental market barrier to increasing supply provided there is sufficient suitable and available land;

The current market downturn has already caused significant issues on the ground with sites not coming forward and in some instances being closed down before completion takes place. Simply stating that sufficient land is available does not ensure that completion rates will return to previous levels and above. Even if they do, there is no certainty that it will happen early enough in the plan period for the higher levels now needed at the end of the period to be obtainable. Other significant factors such as maintaining the skills in the construction industry need to be considered as mentioned in the study, these are very much unknown and do not help to justify the assumption that there is no fundamental barrier.

xvi. The phased release of land needs to focus on managing the risks for fragile markets

The phasing of sites should always be focussed on delivering housing on brownfield land before releasing Greenfield sites. As mentioned above if large areas of green field land are allocated for housing growth, BDC has concerns over developers cherry picking Greenfield sites over brownfield, not only in the conurbation but favouring green field sites over the limited brownfield that exists in Bromsgrove and Redditch. BDC objects to the approach suggested by NLP of allowing significant greenfield release before all available brownfield is developed in order to make up for the difficulties the market is currently experiencing. The assumption that once some strength returns to the market developers will then re focus efforts on developing difficult, and expensive brownfield sites appears to be nothing more than an opinion unsubstantiated with any real evidence.

Section 2

This section deals with the element of the report which specifically mentions additional housing in Bromsgrove District.

Tables 1.1, 1.2, 7.2 and 9.2 all relate in part to allocating further development on the periphery of Bromsgrove District bordering Redditch and Birmingham. BDC strongly objects to these allocations of additional housing growth, on the basis that the level of detail the NLP study has been prepared to, in no way justifies land release at such a local level. Furthermore, part of the justification for apportioning further growth at the district level is because of market strength and affordable housing requirements. Allocating growth in these locations will not help in meeting Bromsgrove related affordable housing needs and does not focus on the Bromsgrove housing market where the perceived strength is.

Throughout the report NLP appears to suggest that it is for LDFs to determine the details of where growth should be accommodated, and specifically mentions

that the Bromsgrove LDF should determine where any additional growth in the district should be located. Somewhat confusingly NLP then suggests potential locations for additional growth in relation to Bromsgrove. This is clearly sending out mixed messages as to where it is best to accommodate growth in the district and the mechanism for achieving this.

NLP have identified that lower quartile housing in the Bromsgrove District remains unobtainable for a significant proportion of the households. The Council does not question this finding and has specific evidence of their own in the form of a housing market assessment completed in October 2008 which would back up this position. The Council does disagree with the suggested locations NLP make as to where new development should be focussed. The report seems to suggest that any new development over and above the RSS figures should be focussed on the South Birmingham and north Redditch borders. The Council completely disagrees with this approach, as an element of the justification for making these allocations is the ability of the extra housing to begin to tackle affordability issues within the district, the market strength of the district and the ability to deliver new housing. The affordable housing issues Bromsgrove faces is one which is prevalent across the whole of the district but especially in the largest settlements of Bromsgrove Town and Catshill. Therefore, to suggest development in areas of the district furthest away from these populations, and also adjacent to other districts would not help in tackling the identified affordability issues in Bromsgrove.

Any allocations which are justified by the need for affordable housing should be allocated to the district as a whole, in order for the core strategy process to determine the correct location for the development. The Council questions the reasoning of NLP in respect to affordable housing needs in Bromsgrove District.

Similarly, the ability of the District to deliver housing is one which is not debated, and also one which NLP have seemingly used to justify additional growth. BDC would again question the logic of the locations suggested for this growth as the high delivery in Bromsgrove over recent years has been dominated from completions in Bromsgrove Town. This would suggest the market strength is not in the areas of the district currently being focussed upon.