BROMSGROVE DISTRICT COUNCIL

Local Development Framework Working Party

23rd October 2008

Summary of Report prepared by Nathaniel Lichfield and Partners - Development of Options for the West Midlands Regional Spatial Strategy in Response to the National Housing and Planning Advice Unit report

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

1. SUMMARY

1.1 The report below summarises the findings of a study prepared by Nathaniel Lichfield and Partners (NLP) commissioned by the Government Office for the West Midlands (GOWM). This was in response to concerns expressed by Baroness Andrews, that the submitted preferred option Regional Spatial Strategy (RSS) review did not deliver the required amounts of housing as reported by the National Housing and Planning Advice Unit (NHPAU).

2. RECOMMENDATION

2.1 That members note the contents of this report

3. BACKGROUND

3.1 The summary below is structured to reflect the structure of the NLP study, as well as an overall summary of what each section contains, key findings specific to Bromsgrove, or general findings which could be applied to Bromsgrove have been included where possible.

3.2 The full title of the report is; Development of Options for the West Midlands Regional Spatial Strategy in Response to the National Housing and Planning Advice Unit report, and is split into 7 volumes which consist of;

- The Main Report
- The Appendices
- Background review
- Sustainability Appraisal (SA) - Non Technical summary
- Sustainability Appraisal (SA) - Full Report
- Habitat Regulations Assessment - Screening Report
- Habitat Regulations Assessment - Full Report

3.3 The focus of this summary is the main report and any relevant sections of the Appendices and the SA, the report is split into 9 chapters including an executive summary, which has been included with this report as appendix 1.

3.4 **<u>Introduction</u>**

This section of the report sets the context for the report and highlights the various sections. As members are aware the report has been commissioned in response to a request from Baroness Andrews, who expressed concern that the submitted RSS did not deliver the amount of new build housing that the NHPAU recommended would be required for the region in the next 20 or so years. The NHPAU's supply range indicated that between 12,300 to 80,700 additional new homes, over and above those already indicated in the RSS preferred option would be required across the region up to 2026, this brings the total amount required to somewhere between 365,600 (RSS preferred option) to 445,600 (upper limit of the NHPAU figures)

3.5 It is stressed in this section that the report is "*intended to provide a transparent and objective analysis of a series of options for delivering additional housing"* the GOWM will be using the report as a basis for their formal response to the RSS revision. It is unlikely Local Authorities will have any steer as to the nature of the GOWM response until the deadline of 8th December. NLP also make it clear that the results of their study are not formal policy or proposals of Government, but purely independent evidence which sets alternative choices for how the region ***might*** deliver additional housing to inform the Examination in Public on the Phase 2 RSS revision.

3.6 **<u>Methodology</u>**

This section describes how the report has been split into 5 separate processes, which are designed to either run concurrently, or be more discrete sections of work which have been informed by the preceding stage of the process and all come together at the end to for the complete study. NLP do stress that the report does not:

- Provide an exhaustive review of all implications of making provision for additional housing in line with the NHPAU supply range through RSS;
- Question the existing housing provision of RSS Phase 2 Preferred Option;
- Set out to identify the 'optimal' strategy for the region either in respect of housing provision or otherwise; or
- provide advice to the region and its stakeholders on the approach that RSS should take on a wide range of planning, economic or other matters.

3.7 <u>Element 1: Evidence base</u>
Volume three of the complete study contains the full review of all the background evidence which informed the RSS phase 2 preferred options. It also contains details of the various stakeholder meetings and findings from

the first regional seminar held by NLP. The review of the evidence was used to generate the original nine options for discussion.

3.8 Element 2: Generation of Options

The options were generated following on from the review of the evidence base and stakeholder meetings/seminar an internal consultant team workshop was also used. Nine options were generated which were presented at the second regional seminar on the 8th July, a summary of these options can be seen in appendix 2.

3.9 Element 3: Sustainability Appraisal

Under EU directive 2001/42/EC this study is not required to have a Sustainability Appraisal. However, to ensure the information contained is robust and credible it has gone through the same appraisal process as the preferred option RSS. Similarly as with the preparation of the BDC Core Strategy, the SA process is a continuous one which underpins the preparation of the report. The SA for the NLP study is also accompanied by a Habitat Regulations Assessment and has been prepared in conjunction with all the other elements of the study.

3.10 Element 4: Impacts and Risks

The nine options were then assessed with regard to the potential impacts and delivery risks, the level of the assessment being to determine if any of the options had potential 'showstoppers.' It was not a highly detailed assessment and it is accepted there will be more localised impacts and risks of some of the options which cannot be determined through a study of this level.

The criteria used to assess the impacts and risks are detailed below:

Impacts	Delivery Risks
Transport	Infrastructure Provision
Community and Social Infrastructure	Transport infrastructure
Hydrology	Market Delivery
Landscape	Planning
Housing Market	Public Sector Delivery
Economy	

3.11 Element 5: Impacts on RSS and Policy

The options were then tested against the principles and objectives of the RSS, Housing Green Paper and PPS3: Housing. The results of this testing are summarised in 3.26 to 3.31 below.

3.12 **Background Evidence**

As indicated in 3.7 a review of a huge amount of evidence took place in order to generate the options to be tested, and key findings from this review are highlighted below in 3.13 to 3.25

3.13 **RSS Policy -** The brief for the study stressed the work had to look at delivering higher levels of housing growth whilst maintaining as many of the principles of the RSS as possible. In looking through these principles, NLP conclude that there is not one which explicitly deals with meeting identified housing needs and tackling affordability, although it is accepted this issue is contained in national policy.

3.14 **Demographic Change -** The study does not test the current published levels of need or demand identified for the region, but rather it takes the NHPAU figures and determines which level within the range of figures identified is suitable and deliverable within the West Midlands region.

3.15 Research into population projections and migration flows indicate that none of the authorities across the region are likely to experience a decline in population over the period 2006-26. There are differences in the levels of indigenous growth with Birmingham experiencing high levels, and declines predicted in some of the more rural areas, such as Malvern. International migration is focussed on the conurbation whereas internal migration is an outward flow from the conurbation to Shire districts, such as BDC.

3.16 A comparison of the RSS provision with the 2008 household projections shows areas where there are shortfalls in provisions if only the preferred option houses were developed. This shows the biggest shortfall is in the south east quadrant of the region, which includes Bromsgrove, where a shortfall of approximately 5900 is identified for the district.

3.17 **Housing Markets, Affordability and Mix -**
A summary of the various housing markets assessments revealed a range of housing market issues across the region. Of particular importance for BDC is the finding that *'Within the South Housing Market Area there is a peculiar effect of a particular shortage of affordable accommodation reducing the apparent need for it by means of displacement of need to another district. The displacement effect of households in need will be quite significant for the districts of Bromsgrove and Stratford on Avon and Warwick.'* This clearly indicates that there is a problem of a lack of affordable housing in the district, which is being masked by the amount of people having to make their housing choices outside of the district.

3.18 Investigation into the relative affordability across the region shows a pattern of the southern and western Shire counties having the biggest gap in affordability. Malvern Hills has the biggest challenge; where lower quartile houses are 11.26 time higher than lower quartile incomes, whilst not as large in Bromsgrove, where a significant gaps exists, the ratio being 9.70 times higher. The Major Urban Area (MUA) has much smaller gaps in affordability, although even here they still remain a significant challenge.

3.19 **Housing Supply Land and Proposals -** Data also reveals that a large amount of new house building completions in the MUA over recent years has been apartment style development, which poses the question about the mix of housing to be provided in the MUA in the years up to 2026. More provision is likely to be needed for family housing which obviously will have larger land requirements, limiting the ability of the MUA to deliver the gross amount of housing identified if the needs of the community are to be met.

3.20 Investigation also revealed that a high level of the supply identified is on hard to develop and expensive brownfield sites. The risks of relying on these sites to meet the needs are considerable, especially with the current downturn in the market, decreasing the viability of these sites further.

3.21 **Economic Change -** The region as a whole is judged to be underperforming economically when compared to other UK regions. This is largely based still on a reliance on the manufacturing industries, with a lower proportion of higher value added industry sectors such high technology. There have been areas of high employment growth in places like Malvern Hills and the South East quadrant; although Bromsgrove has been identified as having only small scale employment growth. Bromsgrove has been identified as having a high level of out commuting especially into Birmingham, with approximately 30-40% of working age people in Bromsgrove travelling into Birmingham for work.

3.22 **Regeneration -** There are a number of regeneration areas across the region mainly in the MUA such as the Birmingham/Sandwell pathfinder Housing Market Renewal Area. NLP have indicated these areas will have to be tackled sensitively when distributing new housing growth, in order to make sure current progress in these areas in not undermined.

3.23 **Transport infrastructure -** there has been significant investment in transport infrastructure over recent years with some significant schemes either underway or in some cases completed. It is identified that more will be required, especially at a local level, to deliver the RSS preferred option and therefore anything over and above this will also need to be factored in the final RSS.

3.24 **Energy, Utilities, and Hydrology -** The evidence used to support the RSS identifies there are some issues around the delivery of new water resources to support new housing growth, although these are more likely to be localised and should not prevent housing growth taking place. Similarly with managing flood risk, there will undoubtedly be localised issues which will have to be dealt with through the development of core strategies.

3.25 **Landscape, Ecology and other Planning Designations -** There are many of these types of designation across the region although, it is suggested, that the LDF process can help to maintain the integrity of these designations through careful allocations polices. One key consideration is the extent to which green belt designations are a constraint in reviewing the distribution of additional housing growth. NLP suggest it will be important to balance the impact of green belt alterations and the need to deliver additional housing growth.

3.26 **Housing in the RSS Revision**

This section of the NLP report summarises the figures contained within the RSS preferred option, which members have been briefed on at previous working groups meetings.

3.27 NLP benchmark the RSS proposals against some key criteria which indicate where the RSS is under-providing against both the projections for need and also the ability to deliver growth. For Bromsgrove the RSS under-provides on both counts. The benchmarking shows that Bromsgrove needs 5900 more units than being allocated just to meet the projections for required growth. Based on past build rates, the district can deliver 329 more units per annum than the RSS preferred option currently allows.

3.28 **Housing Options**

This section of the report describes the approach NLP took to developing the nine options and they are keen to point out the role of the Options is to reflect, and where necessary, test:

- The impacts on underlying objectives of RSS and Government Policy
- Key constraints on development
- The range of policy choices, their impacts, and 'trade-offs'
- Deliverability

The nine options generated are summarised at appendix 2

3.29 The options are then appraised against the following criteria; Impact, delivery risks, SA, Habitat Regulations Assessment, and RSS and housing policy. All the options score differently in the assessment, with the options that deliver smaller amounts of growth scoring better against impact and risk criteria, although poorly against RSS and housing policy objectives, and the reverse happens for those options which propose larger amounts of growth. The options appraisal is then translated into more tangible evidence in the form of the impacts on Local Authority or core strategy areas. The section on Bromsgrove is shown below

Location (Core Strategy Area) Phasing and other	**Phase 2 Revision Preferred Option**	**Option**	**Nos. of Additional Units**	**Key Issues and Impacts**	**Key Infrastructure Challenges**	**Key Delivery Risks**	**Implementation Implications for additional growth** **NLP Conclusions**
Bromsgrove	2,100	3,9 7 8 9	6670 3500 5000 5000	Combination of proposals in options for Birmingham South and Redditch, alongside underlying significant 'under-provision' of RSS Phase 2 against CLG Projections (-5,900), past build rates (-329 pa), and major affordability ratio (9.7) indicate potential and need for further development. A review of the Green Belt would be necessary to accommodate growth.	There is a need to consider with providers the potential for combined impacts in south-west rail corridor. Depending on location,	Over doubling the RSS requirement Could present market capacity issues, and Redditch was not	Phasing would need to be dictated by timescales for transportation (e.g. train lengthening) and water supply/treatment improvements where necessary to support development, this might mean phasing to 2012+ Location of housing

				Both Redditch and urban extensions to the Metropolitan area provide opportunities for using existing public transport infrastructure, alongside potential investment to upgrade. Good radial rail routes into Birmingham, but these lines have high utilisation and limited capacity approaching central stations, albeit that improvements are programmed. A need to consider the combined effect on rail provision to the south west in conjunction with development in urban area of Birmingham has been identified. In terms of the highway network, congestion on routes into Birmingham is currently significant. Whilst modeling demonstrated that growth would not give rise to significantly different impacts in comparison with RSS Phase 2 Revision Preferred Option, there is the potential for significant localised impacts depending on the location of development within the area. It has been suggested that impacts on the SRN would be most severe if development outside motorway box with potential impacts on motorway junctions that are currently at or close to capacity. Although these are important issues, there are potential mitigation measures and are not considered fundamental barriers to further housing growth, particularly at the lower levels. Area partly within Severn WRZ where there are water supply issues that will need to be addressed. Potential need for additional water treatment capacity depending on specific location.	development outside the motorway box could lead to significant traffic impacts on SRN that may require significant funding from development. There are challenges around ensuring sufficient water supply in Severn WRZ for both RSS Phase 2 Preferred Option and any additional growth.	identified as strong market focus if growth was located in that part of the Borough. Investment in infrastructure needed, and risk of non-delivery could hinder development but not considered a major issue, although market delivery could be an issue for higher output.	areas would need to consider infrastructure availability, funding and phasing of delivery at LDF stage in conjunction with providers/regulators **Conclusion: Should be included in Options to reflect potential and opportunities for growth to Metropolitan area (c. 5,000 units) and Redditch (2,500 units)**

3.30 The final column has significant impacts for Bromsgrove. In the conclusion NLP draw from the appraisal *Conclusion: Bromsgrove should be included in Options to reflect potential and opportunities for growth to Metropolitan area (c. 5,000 units) and Redditch (2,500 units)* the section on Redditch also indicated that growth can be catered for in Bromsgrove. It is on the basis of this appraisal that the final three growth scenarios were generated as described in 3.48 to 3.50.

3.31 The detailed analysis of all the nine options indicated that there are issues with physical impact and risk of delivering the higher levels of housing, although in many instances the actual impact or risk could not be quantified due to the strategic nature of the work. The main impacts and risks are flooding and flood risk and water supply; the outcomes of a green belt review; transport infrastructure; air quality; community and social infrastructure and economic. NLP are of the opinion that none of these impacts and risks should be insurmountable.

3.32 Section 8 of the study looks at two key areas, the first one being the RSS and Government objectives for housing and the second one is a summary of the most substantive opinions that were aired through the process of completing the study. The analysis of the RSS and Government objectives identifies a number of key objectives that are particularly relevant to housing provision, they are;

i) The deliverability of a variety of housing in both affordable and market sectors, taking into account the current economic downturn and the impact on timescales for delivering additional houses;
ii) The implications for the MUAs and urban renaissance;
iii) New settlements;
iv) The impact on the Green Belt;
v) Affordable housing supply;
vi) The impact on transport and infrastructure;
vii) The impacts on economic growth; and
viii) The effect on rural renaissance.

The conclusions drawn from an analysis of these objectives are summarised below.

3.33 There is scope to identify more land for housing in the region. It is acknowledged that the identification of significant amounts of new supply will have localised impacts which are beyond the scope of this study to identify. The less visible impacts of not meeting the amount of new housing required must also be taken fully into account when considering land for new housing development.

3.34 The allocation of more housing to the region will not prevent the urban renaissance taking place. There is no evidence to suggest the amount of housing being proposed by the RSS is the full amount developable at which urban renaissance will take place, and nothing suggests that more development will prevent the urban renaissance taking place. The ability to define what the term 'urban renaissance' actually meant was also identified.

3.35 There is no evidence to suggest that allowing higher levels of development outside the MUA's will reduce supply within them and over recent years housing in the MUA's has risen due to the amounts of apartments developed. This market is now judged as being saturated and the restriction of supply outside the MUA's will not rekindle this market, as all it will do is restrict the overall amount of supply across the region.

3.36 There is no evidence to support the assumption that developing more housing in the rural areas of the region causes out migration. The availability of housing is one of the factors which influence these movement patterns alongside employment location; environmental quality; transport accessibility; quality of life / place (services / facilities / amenities); quality of education.

3.37 There are significant risks of under delivery if more housing is allocated to the MUA's which are already failing to meet the current targets for new housing development.

3.38 More allocations in fragile market areas could undermine existing regeneration strategies. Careful phasing in these areas needs to be employed to ensure that new supply does not attract people away from areas where regeneration initiatives have already begun.

3.39 In economic growth areas new supply can help to maintain growth by ensuring there are no labour supply deficiencies. This is particularly important in areas such as the south east of the region, where closely matching employment and housing growth is essential to support economic growth.

3.40 For Birmingham to fulfill its role as a world city, the hinterland needs to provide more good quality housing, restricting supply in areas outside the city, which are clearly within its housing market, harms the city's ability to grow to its desired potential.

3.41 Increasing supply can help to address affordability problems and meet housing needs. The evidence suggests that increasing supply will have an effect on reducing house prices. The greatest need is in the MUA, although the biggest gaps in affordability are in the Shire counties and rural areas. Increasing allocations in these more rural areas could deliver significant levels of affordable housing, as the developers can generally afford higher levels of affordable housing.

3.42 Additional growth is likely to require Green Belt release and urban extensions are judged to be more sustainable than leapfrogging the green belt. Mixed use extensions around south Birmingham in the south east of the region could have wider benefits of support in the economic growth already taking place in this location.

3.43 New Settlements can from part of the new supply regime, either as smaller (under 10,000 units) new settlements linked to existing settlement or entirely new standalone settlements, in the region of 20,000 units.

3.44 Transportation is not seen as a barrier to development, and the amount of new infrastructure required to deliver the higher growth options is not that much more than the amount required to deliver the preferred option. It is accepted that at the local level a significant amount of mitigation will be requires to limit the impacts of new housing developments. Whilst the technical ability to deliver the required amount of transportation infrastructure is not questioned by NLP, they point how risks of delivery could be high due to the financial implications of this level of infrastructure and whether or not hey have already been considered in exiting funding commitments.

3.45 Hydrology is not seen as a significant issue which cannot be overcome by investment in infrastructure and careful consideration of potential new sites through the development plan process in core strategies.

3.46 It is acknowledged that the current downturn in the market will have an adverse effect in the short term on the ability of the region to develop the amounts of new housing being tabled, although in the longer term with more stable financial environment it is deemed to be possible. An analysis of long term building rates identified that the housing market has the ability to increase production significantly with favourable financial conditions. A number of concerns are expressed such as the percentage of affordable housing required on sites preventing development taking place. One possible solution to this issue could be to reduce the on site targets to allow a lower percentage of affordable housing, and on a larger quantum of housing which may deliver the same or more units than applying a higher rate to a lower level of supply. Another key issue could be the current market downturn and lack of development taking place reducing the amount of new recruits to the development industry. This could create a skills gap which would need to be filled before the industry could develop housing to its full potential when the financial markets strengthen. With these possible scenarios taken on board NLP, take the view that the upper level of the NHPAU range 80,000 more units than currently proposed (445,600 in total to 2026) would be a significant challenge, and somewhere in the mid range is more likely to be delivered.

3.47 Section 9 draws together the findings indicated in the various sections above and attempts to suggest more tangible conclusions as to what they all mean for the distribution of the NHPAU supply range of housing across the West Midlands region. NLP have done this by suggesting three different scenarios for additional growth. Scenarios 1 and 2 look to deliver between an additional 51,500 and 54,000 new units, and scenario 3 looks more to the upper range being suggested by the NHPAU and suggests 80,000 additional properties are delivered. These scenarios recommend Bromsgrove can take more growth although not necessarily in locations which provide the largest benefit for the district.

3.48 **Scenario 1 - South East Focus**

This scenario focuses growth in the South East corner of the region, and with some provision in the rural west, which identified scope for some 51,500 additional dwellings (an extra 2,575 per annum), providing a total of 417,100 dwellings by 2026. The ratio of provision between MUAs and non-MUAs as a whole, would move from 46:54 to 47:53. Provision would be focused on parts of the region, with some of the greatest levels of unmet need and affordability, with principal increases in the south and central C1 Housing Market Areas. This option would involve a new settlement in Solihull. This scenario would see growth arguably supporting parts of the region where economic growth is potentially being hampered by a lack of housing. This scenario indicates an additional 5,000 dwellings in Bromsgrove, although they are recommending they are provided through urban extensions to south Birmingham (2500 units) and Redditch (2500 units).

3.49 **Scenario 2 - Spreading Growth**

This scenario, delivering circa 54,000 additional dwellings (419,600 in total and an extra 2,700 pa) makes provision in the south east of the region where economic growth is strongest (although less than in the previous scenario). This also includes growth in North Staffordshire, Telford and Wrekin, and East Staffordshire, where there is additional capacity for development, and with appropriate phasing, funding and delivery mechanisms to support delivery. This spreads the development and market risk across a wider area. The ratio of MUA to non-MUA for housing distribution would be 47:53, with the focus of growth in both the south east and in part of the north of the region, with identified capacity and/or scope for additional growth, supporting affordability; economic and regeneration objectives. Again this scenario indicates an additional 5,000 dwellings in Bromsgrove, although they are recommending they are provided through urban extensions to south Birmingham (2500 units) and Redditch (2500 units).

3.50 **Scenario 3 - Maximising Growth**
This potential scenario, which delivers 80,000 additional dwellings (445,600 in total and 4,000 extra per annum) makes higher levels of provision across a range of locations in the region. This includes in and around the southern side of the Metropolitan MUA, in Telford and Wrekin, North Staffordshire, East Staffordshire, and Stafford, alongside rural housing provision in the west of the Region. It is undoubtedly the case that this higher level of provision, whilst not necessarily unachievable, provided sufficient available and developable land is released, would be a higher risk, given the level of build rates required. The ratio of MUA to non-MUA for housing distribution would be 46:54, with significant levels of growth in the key locations identified in the preceding scenarios, focusing on affordability, economic, regeneration and additional capacity opportunities. This scenario indicates an additional 7,500 dwellings in Bromsgrove, although they are recommending they are provided through urban extensions to south Birmingham (5000 units) and Redditch (2500 units).

3.51 As already indicated in paras 3.33 to 3.46 the overall findings of the study are:

- There is scope to identify additional land for housing within the Region.
- Additional housing provision need not harm achievement of Urban Renaissance.
- There is no evidence that increased supply outside the MUAs will reduce housing supply within them.
- There is no evidence that increasing housing supply outside the MUAs increases out-migration.

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

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

- Additional housing can assist economic growth and Birmingham needs more good quality housing in the city and its immediate hinterland, to support its global role.

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

- Additional housing growth can support rural renaissance and support RSS Objectives for regeneration.

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

- New Settlements are a potential form of development that could meet housing requirements, in the right locations, and if the delivery capability is put in place.

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

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

- The market downturn means the trajectory of housing delivery will change from that envisaged by the RSS Phase 2 Preferred Option, but there is no fundamental market barrier to increasing supply, provided that there is sufficient supply of suitable and available land for development.

- The phased release of land needs to focus on managing the risks for fragile markets, whilst also ensuring that supply increases as quickly as possible out of the downturn.

3.52 Next Steps

The NLP study is essentially being used to inform the GOWM's response to the RSS preferred option. Over the next few weeks the Strategic planning section will be preparing submissions on the RSS preferred option and potentially a separate submission on the NLP study in time for them to be submitted to the WMRA by the 8th December deadline. These submissions will deal in more detail with the implications of the RSS policies and the findings of the NLP study as well as other studies which can inform the RSS review. Following on from that, the RSS revision will go through an Examination in Public (EIP) in April 2009. The timetable for the process beyond the EIP is unknown at the moment, although it is not expected the full Phase 2 review of the RSS will be completed during 2009.

4. FINANCIAL IMPLICATIONS

4.1 None

5. LEGAL IMPLICATIONS

5.1 None

6. COUNCIL OBJECTIVES

6.1 The implications of the NLP study could have significant effects on the ability of the Council to deliver its housing and regeneration priorities, although the full extent will not be known until the process is complete. Representations and participation in the Examination in Public could influence the final RSS to include policy elements which better meet the needs of the district than those currently being proposed.

7. RISK MANAGEMENT

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

- The ongoing delays caused by the request for this study to be carried out effects the ability of the district to produce its own Development Plan Documents, specifically the core strategy.

7.2 These risks are being managed as follows:

Risk Register: Planning and Environment
Key Objective Ref No: 6
Key Objective: Effective, efficient, and legally compliant Strategic planning Service

8. CUSTOMER IMPLICATIONS

8.1 None

9. EQUALITIES AND DIVERSITY IMPLICATIONS

9.1 None

10. VALUE FOR MONEY IMPLICATIONS

10.1 None

11. OTHER IMPLICATIONS

Procurement Issues	None
Personnel Implications	None
Governance/Performance Management	None
Community Safety including Section 17 of Crime and Disorder Act 1998	None
Policy	The outcome of the RSS review will effect the content of future planning policies in the district
Environmental	The environmental implications of providing significant levels of new housing, potentially on green field sites are difficult to quantify at the moment although they will have to be fully considered through preparation of the various LDF documents.

12. OTHERS CONSULTED ON THE REPORT

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

13. WARDS AFFECTED

All Wards are potentially affected by the RSS

14. APPENDICES

14.1 Appendix 1

Development of Options for the West Midlands Regional Spatial Strategy in Response to the National Housing and Planning Advice Unit report - Executive Summary.

14.2 Appendix 2

Summary of Options generated by NLP to test growth scenarios across the West Midlands Region.

15. BACKGROUND PAPERS

Development of Options for the West Midlands RSS in Response to the NHPAU Report

- A main report setting out the results of the study
- A volume of Appendices
- A background review summarising evidence
- A Sustainability Appraisal of the options considered in the Study
- An assessment of the options in terms of the Habitats Directive

All these reports can be downloaded from www.nlpplanning.com/wmrsshousingoptions

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