

BROMSGROVE DISTRICT COUNCIL

Local Development Framework Working Party

15th October 2009

Draft Core Strategy

Responsible Portfolio Holder	Councillor Mrs J Dyer
Responsible Head of Service	Dave Hammond, Head of Planning & Environment Services
Non-Key Decision	

1. SUMMARY

- 1.1 The purpose of this report is to update Members on the response findings regarding the consultation carried out on the Draft Core Strategy.

2. RECOMMENDATIONS

- 2.1 That Members note the contents of this report and the Response Report on the consultation process in relation to the Draft Core Strategy.

3. BACKGROUND

- 3.1 Members will recall on the 23rd October 2008 the Draft Core Strategy was approved for consultation purposes.
- 3.2 Consultation on the Draft Core Strategy commenced on the 31st October 2008 for a period of approximately 15 weeks until 16th February 2009. Two other documents were also specifically consulted upon during this period including the Sustainability Appraisal and the Consultation Report.

4.0 UPDATE

- 4.1 You will recall at the meeting on 16th March that the intention was to report back with the findings on the consultation and any resultant proposed changes that were required. 135 representations have been received generating around 950 individual comments. The responses have been received from a variety of sources including organisations such as Parish Councils, private companies and private individuals. Officers have been working to summarise these responses and respond to each individual comment. A Response Report has been prepared which, due to its length, is available for viewing in hard copy in the Members Room or available in electronic form on request.
- 4.2 The policies which generated the most comments were CP2 Distribution of Housing (118), CP1 Climate Change (50), followed by CP8 Employment, CP14 Scale of Housing, CP3 Rural Renaissance, CP 12 Type, Size and Tenure of Housing, CP15 Cross Boundary Growth and CP16 Affordable Housing each receiving around 30-40 comments.

4.3 As can be seen from this many of the comments received centre around the issue of housing. Many of the comments received related to the Regional Spatial Strategy Phase 2 Revision and sometimes incorrect assumptions were made about the status of the White Young Green Stage 2 Report and the Nathaniel Lichfield and Partners evidence. Obviously when preparing the responses, the outcome of the Examination in Public was unknown and we have therefore responded accordingly on this issue. There was some criticism that the Redditch growth issue was not tackled in enough depth and failure to appreciate the implications of the fact that Bromsgrove was formally objecting to this growth was evident.

4.4 Alongside this process the Council has also taken the opportunity to benefit from a tailored support programme via the Spatial Planning Peer Programme. This programme is sponsored by CLG and delivered by the Planning Advisory Service (PAS) and the Improvement and Development Agency (IDeA). At the time of writing a draft feedback report from the Spatial Planning Peer (SPP) has now been received and the main points to emerge are as follows:

- 1) LDF Team to have more informal contact with Members
- 2) Adoption of more informal Working Group procedures
- 3) Use of techniques such as undertaking a SWOT analysis jointly constructed by officers and Members for LDF subject areas
- 4) Explore techniques which can 'break the mould' and consider innovative solutions.
- 5) Hold discussions facilitated by specialists to bring out alternative solutions.
- 6) Shared officer / Member training sessions
- 7) Identify 'sticky issues' early on and return to them on a regular basis
- 8) Take greater part in regional forums and groupings to share and receive information with other, perhaps similarly placed authorities.
- 9) Pursue early engagement with the GO
- 10) Where guidance proves insufficient, seek out sources of relevant best practice or sources of evidence, such as joining groups such as Planning Officers Society (POS)
- 11) Regular local cross border liaison for instance, Bromsgrove and Redditch joint working opportunity.

4.5 Below is found a brief summary of some of the key negative points to emerge from the consultation for each policy. (It should however be noted that wide ranging support was received for the document as a whole which can be viewed in full in the Response Report .

4.6 CP1 Climate Change (118 comments)

4.7 This policy generated strong feelings both for and against. There were, generally speaking, 2 main camps of opinion:

- 1) Welcomes the inclusion of policies to address this important global issue
- 2) Due to the current economic climate the policy will be detrimental to delivery of the required level of housing, also sited a claimed lack of evidence base and that targets set above National Policy levels

4.8 CP 2 Distribution of Housing (50 comments)

- 4.9 Opinions differed on whether a hierarchy for determining the location of new housing had been provided at all or conversely that the hierarchy provided was not strong enough.
- 4.10 Also linked to this was a lack of provision of a hierarchy of settlements which at present is only really defined on the key diagram. Many would welcome the role and proposed growth for each settlement detailed. The primary growth location of Bromsgrove Town was questioned by some and it was considered that growth should be distributed across the district.
- 4.11 The terms used on the key diagram to describe the relative size of settlements is at present, “large settlements”, “small settlements” and “other settlements”. The term “other settlement” was criticised as being offensive with the term “villages” generally being preferred.
- 4.12 An apparent inconsistency was pointed out between the final sentence of paragraph 6.15
*“Therefore development in rural areas must meet **local needs** and development will only be permitted where it would not have an adverse impact on the existing character of the locality”*

and criteria e) of CP2

*“Redevelopment for housing or the development of new housing in the form of **limited infilling** within Green Belt settlement boundaries providing this would not have an adverse effect on the character of the settlements....”*
- 4.13 There was some confusion over the status of “Areas of Development Restraint” and Areas of Potential Growth and a lack of justification for removal of some ADR’s.
- 4.14 Some commented that the DCS needs to go further and identify additional land for development over and above the RSS Preferred Option (in response to NLP report) and also some views that the SHLAA is flawed as it discounts land in green belt.
- 4.15 A lack of evidence on historic and ecological evidence was pointed out by specific lobby groups.
- 4.17 Some expressed the view that Redditch Growth should have been included in this policy (even though this policy deals with growth for Bromsgrove’s needs and Redditch growth is dealt with in CP15 Cross Boundary Growth).

4.18 CP3 Rural Renaissance (34 comments)

- 4.19 There was some criticism that the list of settlements deemed appropriate for rural exception schemes, is too restrictive.

- 4.20 Views expressed that the policy, in aiming to preserve the character of rural settlements, is too restrictive and will stifle growth. The implication is that development should be allowed to go ahead in the green belt.
- 4.21 Also some consider there is a lack of recognition that more growth will help to retain facilities.
- 4.22 CP4 Promoting High Quality Design (21 comments)**
- 4.23 Policy was generally supported with suggestions for improvements
- 4.24 CP5 Managing Natural Assets (26 comments)**
- 4.25 Again there was support for and against this policy with generally speaking the environmental lobby supporting it and the private sector objecting to protection of the natural environment unless it involved statutorily protected species/ environments etc.
- 4.26 The need for a Green Infrastructure Study/ Strategy work was highlighted
- 4.27 CP6 Managing Man Made Assets (19 comments)**
- 4.28 Some views that preferential weight should be given to development which preserves listed buildings but conversely that the policy should have been written more flexibly to allow development to proceed.
- 4.29 A lack of reference to historical evidence base was pointed out and remarks that policy is not locally distinctive enough.
- 4.30 On the whole there was general support for the policy with minor changes to wording suggested.
- 4.31 CP7 Water Management and Flood Protection (23 comments)**
- 4.32 Many comments that individual rivers and cases of flooding should have been included in the text, which fails to appreciate the strategic nature of Core Strategy document and the supporting, detailed evidence provided by the Strategic Flood Risk assessment.
- 4.33 The Environment Agency suggests expanding the text and providing further clarification on the overall policy.
- 4.34 CP8 Distribution of New Employment Development (35 comments)**
- 4.35 Clarification was required over whether all or just one of the criteria listed at 1 - 4 (to be applied to assess whether the loss of employment land will be acceptable) needs to be complied with.
- 4.36 Some consider not enough emphasis is placed on supporting/retaining existing businesses.

4.37 Views expressed that policy is too focussed on Bromsgrove, Longbridge and/or rural areas with insufficient attention paid to other settlements.

4.38 CP9 Retail and Town Centre Regeneration (16 comments)

4.39 Some commented that a hierarchy needs to be set out with the role of the Town Centre and other settlements clearly defined together with relevant policies.

4.40 CP10 Sustainable Transport (24 comments)

4.41 Need for clarification in relation to travel plans and transport assessments.

4.42 Some expressed view that insufficient attention was paid to railway stations in other centres across the district.

4.43 Need more emphasis on changing travel behaviour to encourage modal shift, citing healthier lifestyles and improved environmental conditions as the benefits with the aim of shifting to more sustainable modes for those with or without cars.

4.44 CP11 Open Space and Recreation (23 comments)

4.45 Various concerns were raised in relation to green corridors, for instance, if this provision would render sites unviable and that green corridors should be seen as multi functional and primary purpose should not be seen as transport route.

4.46 The omission of Local Standards was criticised by some (this was not available in usable form at time of commencement of consultation.)

4.47 Some explanation of the terms used was requested.(A glossary to be included in next version.)

4.48 CP12 Type, Size and Tenure of Housing (34 comments)

4.49 The emphasis on promotion of 2-3 bedrooled properties was criticised by some who considered that on some developments, larger properties should be provided to promote mixed/sustainable developments. (The DCS does not preclude this)

4.50 Some commented that the reference to reduced densities should not be confined to Barnt Green.

4.51 Some considered more emphasis should be given to the policies targeted at the elderly with exploration of different categories of accommodation for instance in terms of extra care.

4.52 CP13 Accommodation for Gypsies, Travellers and Showpeople (6 comments)

4.53 Very few comments in relation to this policy apart from minor wording changes.

4.54 CP14 The Scale of New Housing (39 comments)

4.56 Comments broadly centred around the fact that although this policy was referred to “scale” an actual figure had not been included in policy wording (although RSS preferred option was referred to in the supporting text)

4.57 Support was expressed for need for a higher housing allocation in Bromsgrove.

4.58 Policy in relation to the treatment of windfall sites was criticised. For instance the view was expressed that planning permission should be granted for windfall sites where they comply with specified criteria, whether or not this would lead to housing oversupply.

4.59 CP15 Cross Boundary Growth (30 comments)

4.60 Understandably many wrong assumptions were made about this policy and the differences between the purposes/ evidence behind the RSS and the LDF.

4.61 Comments were received that the policy did not go far enough in simply repeating the RSS phase 2 revision figure and that the RSS PO figure was not high enough (this fails to appreciate that housing targets are set at a regional level.)

4.62 Much opposition was expressed to the principle of providing for Redditch growth within Bromsgrove district, which it was considered would undermine the objectives in the Draft Core Strategy. Others however considered specific sites should have been identified to accommodate this growth to generate meaningful consultation, rather than just indicating a broad location on the key diagram.

4.63 Comments were made regarding the lack of joint working with Redditch as Bromsgrove is objecting to Redditch Growth issue with concerns regarding failure to consult on the proposed sites to deliver Redditch growth.

4.64 Some people were supporting Birmingham growth but not Redditch growth, again failing to realise that this suggestion from NLP provided evidence for the RSS EiP not the LDF Core Strategy.

4.65 The White Young Green stage 2 report was referred to with some opposition and some support but sometimes with misconceptions regarding its role and status in relation to the formulation of the Draft Core Strategy.

4.66 CP16 Affordable Housing (30 comments)

4.67 Many questions were raised whether the viability of this policy had been explored and if there was evidence to justify the 40% target

- 4.68 An anomaly was pointed out between the provision of affordable housing for local needs on the one hand and allowing free market housing as infill on the other as outlined in CP2.
- 4.69 Some comments were received regarding the reference to 5 dwellings in other settlements and questioned whether this is realistic. It was considered that the provision of 5 or more dwellings in “envelope villages” is unlikely to arise very often as Green Belt policies will probably prevent infilling at this scale.
- 4.70 Considered by some that policy should be applied very flexibly particularly in current economic climate.

4.71 CP17 Sustainable Communities (17 comments)

- 4.72 Comments received that part of this policy referring to developer contributions should form its own separate policy.
- 4.73 The policy wording was questioned where it states that “All forms of development should achieve a net benefit to the local community taking account of its needs and aspirations” and it was considered the term “net benefit” should be replaced with “neutral benefit”.
- 4.74 Much support was expressed for retention of services in rural communities.

4.75 General comments

- 4.76 The opportunity presented by this consultation was taken by many interested parties to put forward sites which had already been considered (and in some cases discounted) as part of the SHLAA process.
- 4.77 Other comments were also received of a general nature, for instance relating to other parts of the document, such as the spatial portrait and strategic objectives.
- 4.78 Some considered that there was a need by some for a green belt review.
- 4.79 One issue of note was the considerable response from Hagley residents, with the exception of one respondent, overwhelmingly objecting to any further growth in Hagley.
- 4.80 Some considered that the document was too long and jargonised whilst others claimed it was clear, concise, bold and visionary.

5. NEXT STEPS

- 5.1 Once the implications of the RSS EiP panel report have been fully assimilated, another version of the Draft Core Strategy will be prepared and consulted upon as soon as possible. Furthermore in the next version it is intended to include Strategic Site Allocations, incorporate any changes as

appropriate as a result of the consultation and any changes arising from any new evidence.

- 5.2 The Proposed Changes Report of the Secretary of State is scheduled in Spring 2010 and if forthcoming at this time will enable any further implications to be incorporated into the submission version of the Core Strategy.

6. FINANCIAL IMPLICATIONS

- 6.1 There are no direct financial implications of receiving this report. The Spatial Planning Peer Programme is provided free of charge to receiving Local Planning Authorities.

7. LEGAL IMPLICATIONS

- 7.1 Development Plan for the District required by the Planning and Compulsory Purchase Act 2004, and prepared in accordance with The Town and Country Planning (Local Development) (England) Amendment Regulations 2008.

8. COUNCIL OBJECTIVES

8.1 Objective 1 Regeneration

The Draft Core Strategy identifies the long term spatial vision for the district this includes key areas such as the regeneration of the town centre.

8.2 Objective 3 Sense of Community and Wellbeing

Extensive consultation has been carried out at various stages during the preparation of the Draft Core Strategy and in the course of the preparation of the supporting evidence base. The Draft Core Strategy is a publicly available document that identifies the vision for the District up to 2026.

Furthermore, proposed policies within the Draft Core Strategy direct where and when new housing should be built across the district up to 2026. It examines affordable housing, to be supplemented by an Affordable Housing SPD which will aim to maximise affordable housing provision across the district.

8.3 Objective 4 Environment

The Draft Core Strategy sets out the long term spatial vision for the district and the strategic policies required in delivering that vision. It attempts to tackle social, economic and environmental issues affected by the implementation of various policies. Climate change is a central theme of the Draft Core Strategy and it contains specific policies which address this issue in terms of both adaptation and mitigation.

9. RISK MANAGEMENT

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

- Inability to produce development plan document which is judged to be sound by the planning inspectorate and therefore resulting in non legally compliant Strategic planning service

9.2 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

10. CUSTOMER IMPLICATIONS

10.1 The Core Strategy is likely to have an impact on many different aspects of people's lives including living, working, shopping, leisure and education. Public consultation has been and will be extensively undertaken throughout the process.

11. EQUALITIES AND DIVERSITY IMPLICATIONS

11.1 An equalities impact assessment will be carried out on the final submission version of the strategy, although attempts will be made to consult with all sections of society as the plan progresses towards completion.

12. VALUE FOR MONEY IMPLICATIONS

12.1 Whilst there are no direct value for money implications connected with this report, methods to provide value for money are continuously being explored, for instance via joint procurement for external consultancy work identified as a requirement to provide a robust evidence base for the Core Strategy and striving to carry out consultation on various documents concurrently thereby achieving cost savings.

13. 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 core strategy forms an essential part of the LDF and the policies contained within the core strategy will shape future development.
Environmental	Draft Core strategy contains policies which directly impact on the environment.

14. OTHERS CONSULTED ON THE REPORT

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

15. WARDS AFFECTED

All wards.

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