

## **Bromsgrove District Council response to West Midlands Regional Spatial Strategy Phase 2 Revision.**

This response is an officer's response which only addresses the housing and employment land elements of the revision, and does not have any official endorsement from Bromsgrove District Council.

### **Housing**

The revision document identifies three options for the required number of new houses to be built in Bromsgrove 2001 – 2026, for clarity they are listed below.

Option 1	3800 new dwellings
Option 2	4700 new dwellings
Option 3	7200 new dwellings

Before looking at the specific options, it is important to outline the current situation in Bromsgrove regarding housing supply. Bromsgrove has been operating a housing moratorium since July 2003 due to an oversupply of new housing based on Worcestershire County structure plan figures. The oversupply position still exists in relation to the current RSS, the methodology of applying the proportion Bromsgrove was allocated under the structure plan, to the Worcestershire target in the RSS indicates that at April 2006 Bromsgrove had a 10 year oversupply, put simply it has enough new dwellings completed or with planning permission to meet the current phasing targets up to 2016. Obviously this means whatever target is identified through the phase 2 revision of the RSS the district will have already to a more, or lesser extent completed a significant amount of the requirement to 2026.

The main implication of this situation is the ability to meet the affordable housing needs of the district. Bromsgrove has a locally generated affordable housing need of approximately 120 new affordable dwellings per annum, this figure does not include the need generated from migration into the district, although it does include an element of existing backlog.

Although 100% affordable housing is an exception to the housing moratorium the required rates are consistently not being developed. The ability to deliver affordable housing is severely hampered by the inability to access cross subsidy generated by development of market housing. Further to this the release of large sites for purely affordable housing schemes contradicts the sustainable communities agenda whereby it is recognised that affordable housing should be an integral part of a wider development. Therefore it is accepted that Bromsgrove will need to build housing over and above its own generated needs to be able to meet the affordable housing needs of the district.

The specific implications of each option is highlighted below

### **Option 1**

It is clear to see the benefits of this level of growth, primarily the potentially lower impacts on the environment, the reduced use of Greenfield land and the continuation of the

current RSS policy to concentrate growth on the major urban areas, rather than encourage migration to the surrounding rural areas. This level of growth will also satisfy the estimate of locally generated need and will have very little impact in satisfying the need from migration into the district in accordance with the current RSS.

Under this option due to the current oversupply in Bromsgrove it is very unlikely that the amounts of affordable housing required will be delivered. The lack of any significant new development will further exacerbate the current affordability problem, restricting access to the housing market for a significant amount of people. This approach would be in direct opposition to the governments' key policy goal as stated in PPS3 to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live.

If option 1 is the preferred option and taking account of the current supply position Bromsgrove would be required to build around 1400 dwellings up to 2026, a very high proportion of these dwellings would have to be affordable to meet the required needs. This high percentage of affordable housing required on all sites could potentially effect the deliverability of many identified sites, as the cost of providing affordable units effect the profitability and thus render sites uneconomical to develop. Option 1 is not supported by Bromsgrove district.

### **Options 2 and 3**

Whilst the figures being suggested under options 2 and 3 are different many of the implications are similar and therefore will be considered together.

The level of development being indicated under options 2 and 3 would allocate further dwellings to Bromsgrove over and above the estimate for locally generated needs. Whilst it is accepted that it's impossible to resist all of the migration needs and desires of people living outside the district, to begin to allow substantial migration into Bromsgrove could undermine the principles of the current strategy. The ratio presently identified in the RSS is that by 2021, 10 houses will be built in the major urban areas to only seven in the remainder of the region, these levels alter the ratio of development to, ten houses in the conurbation to 9.92 elsewhere under option 2 and almost a 50/50 split under option 3. This is a considerable shift in the pattern of development and the ability to reverse the trend of decentralisation could be significantly affected by these options. For a district such as Bromsgrove which is constantly subjected to the development pressures of the conurbation this shift change is clearly of significance, and places more pressure for new development in a district where the primary function is to resist further development over that which is generated locally.

The ability of the Birmingham conurbation to deliver its own targets also plays a fundamental role in the pressure placed on Bromsgrove which as a district is 91% green belt and has a key strategic role in the preventing the MUAs expanding beyond its current boundaries. Although the level of development being tabled by options 2 and 3 will inevitably attract people into Bromsgrove it is felt that the overriding need to provide

affordable housing for the district outside of the current restrictions of the moratorium outweighs the potential weakening of the current RSS by allowing limited development in Bromsgrove to meet the needs of the Major Urban Area. The 4700 dwellings required under option 2 could be largely accommodated on sites identified in the Bromsgrove housing capacity study, thus reducing the need to release Greenfield sites, although if the current brownfield sites identified in the housing capacity study fail to deliver the required amount of new dwellings, the current provision of ADR (Area of Development Restraint) land around Bromsgrove can accommodate the balance of housing to be provided.

Under option 2 and taking the current supply into account Bromsgrove would be required to build around 2300 dwellings up to 2026. If option 3 is the preferred option then the likelihood of Greenfield release is further increased, as approximately 4800 dwellings will have to be built up to 2026.

One element of both options 2 and 3 which must not be overlooked is the requirement of Redditch to provide substantial amounts of new development some of which will have to be provided in neighbouring districts of which Bromsgrove is one.

The inability of Redditch to deliver the 8,200 or 13,200 dwellings required under option 2 and 3 within its own boundaries introduces a number of anomalies into RSS. The current RSS principle of meeting locally generated needs within, as far as possible the district the needs arises from, would be clearly weakened by the allocation of housing land in Bromsgrove to meet the needs of Redditch. Furthermore the actual amount of development required is not specified, this lack of detail makes it impossible to consider the full implications of this option.

The overarching problem with options 2 and 3, other than the shift change in the pattern of development is the fundamental undermining of national green belt policy. Whilst it is accepted that further growth to the south west of Redditch is difficult to deliver to due the lack of infrastructure, it must also be stressed to release green belt land to the north or north west of Redditch in the Bromsgrove district would begin to narrow the strategic gap between Redditch and the Birmingham conurbation, this narrowing of the gap is clearly contrary to PPG2 and damages the function of the green belt.

Another element which appears to have been given no consideration is the demands development in this region will place on the infrastructure of those areas of Bromsgrove on the border with Redditch. The inability of Redditch to expand to the south west due to lack of infrastructure is constantly stated, the infrastructure in the areas to the north of Redditch in Bromsgrove is also limited, and would not be able to support new development which could be imposed under options 2 and 3, without substantial improvement.

The environmental implications of both option 2 and 3 are clearly significant, the undeveloped nature of large parts of Bromsgrove means there are many areas of environmental importance. The land currently zoned as ADR land has been assessed for its ecological importance and nothing significant has been found which could significantly

hamper development. ADR land has already been taken out of the greenbelt due to its suitability in meeting the expansion needs of Bromsgrove. Any development in the south of the district on the borders with Redditch could be significantly affected by any sensitive environmental conditions found on these sites. The lack of any basic survey work to determine the suitability of the land surrounding Redditch must be undertaken before deciding that Redditch should be expanding to neighbouring districts, and not simply within its own boundaries to the south west.

Option 3 provides Bromsgrove the greatest opportunity to address the overall housing supply and affordable housing problems it currently has, although the wider ramifications of this level of development must not be overlooked in favour of short term problem solving. The supply of ADR land within the district along with the release of key Brownfield sites could deliver the number of houses required in key sustainable locations, although the ability of the construction industry to physically build the houses must be questioned.

For this level of development to take place significant investment must be made in the infrastructure of those places where considerable new dwellings are expected to be built. The current revision should clearly identify the funding mechanisms to support this infrastructure development, within which should be included the funding of new community infrastructure such as health care and schools, which will be required to serve this level of development.

In conclusion the current revision of the RSS cannot completely satisfy all of the wider considerations, such as the need for increased levels of house building whilst trying to prevent the outflow of people from the conurbation, and the continued protection of the green belt; this inability means that not one of the housing options is completely acceptable.

Option 1 whilst meeting the locally generated needs of Bromsgrove does not allow for new development to help alleviate the affordable housing crisis in the district, and more importantly does not meet the estimated demand for the West Midlands region as a whole and therefore its is not considered to be a suitable option.

Options 2 and 3 again are not completely acceptable, the level of development proposed under option 2 is the most acceptable as it allows for growth with the district which will primarily be to meet the locally generated needs and will also allow the development of much needed affordable housing on primarily brownfield sites.

The levels of development proposed under option 3 whilst offering the biggest opportunity to balance Bromsgrove's housing market will also encourage substantial migration into the district from the major urban area. This high level of in migration is a substantial shift in policy which could require significant Greenfield release and therefore is not supported by Bromsgrove District.

The indication that some of Redditch's housing need, must be provided for in Bromsgrove appears to have limited justification, especially the growth figures outlined in option 3. The narrowing of the strategic gap between Redditch and the major urban area as outlined above is damaging to the function of the green belt and therefore it is not considered to be an acceptable part of either option 2 and 3. Any allocation in Bromsgrove to meet the housing needs of Redditch will be strongly resisted.

## **Employment**

The methodology behind the allocation of employment land is unclear from the revision document, although it must be clearly stressed that the provision of employment land must be linked to the allocation of housing required in each district.

Bromsgrove has already provided significant amounts of employment land over recent years many of which is still unoccupied, the indication that up to 100 hectares more may have to be found is concerning and appears to have no correlation with the provision identified in surrounding districts, and no obvious link with the three options for residential development. For this level of employment land to be provided substantial amounts of Greenfield release may be required. Further justification needs to be provided to indicate how these figures have been arrived at.