



BROMSGROVE DRAFT CORE STRATEGY 2
REPRESENTATIONS IN RESPECT OF LAND AT
BROCKHILL WEST, REDDITCH

ON BEHALF OF
PERSIMMON HOMES SOUTH MIDLANDS,
MILLER STRATEGIC LAND AND
SOUTHERN & REGIONAL DEVELOPMENTS

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1 REPRESENTATIONS

Introduction

- 1.1 RPS Planning & Development (RPS) has been retained by Persimmon Homes South Midlands (Persimmon), Miller Strategic Land (Miller) and Southern & Regional Developments (SR&D) to make representations to the Bromsgrove District Council Draft Core Strategy 2 in respect of their land interests at Brockhill West, Redditch. The land in question straddles the Borough boundary with Bromsgrove District and lies to the west of the recent Brockhill development (Plan RPS1). RPS1 identifies the Borough boundary for clarity.
- 1.2 Previous representations were made on behalf of the clients to the Redditch Growth consultation in March 2010 in support of development at this location. The consultation was run jointly by Redditch and Bromsgrove Councils identifying the need for a contribution of some 3,000 dwellings to be provided in Bromsgrove District on the edge of the Redditch urban area to meet the needs of Redditch. There is also a recognised need for cross-boundary employment land allocations to meet Redditch related needs.
- 1.3 RPS has made separate representations on behalf of Persimmon in relation to land at Brockhill East also on the edge of Redditch and straddling the Borough boundary. Parallel responses have also been made for both Brockhill West and Brockhill East to the Redditch Draft Core Strategy consultation, submitted in early March 2011.

Housing Requirements

Strategic Policy

- 1.4 The development plan for the Bromsgrove area continues to comprise the Regional Strategy for the West Midlands and saved policies of the Worcestershire Structure Plan and the adopted Local Plan for Bromsgrove District (2004). The formal Regional Strategy (January 2008 Regional Spatial Strategy) does not contain district housing requirements and is based on housing projections from over some 10 years ago. It is appropriate therefore to attach significant weight to the more recent evidence base for the West Midlands RSS Phase 2 Revision (WMRSS2) which addressed district level housing requirements and which has undergone formal independent scrutiny reported by the Examination Panel in September 2009.
- 1.5 The WMRSS2 as submitted indicated a requirement of 2,100 dwellings in Bromsgrove District to meet internal growth needs and 6,600 dwellings for Redditch Borough of which 3,300 dwellings were to be provided within the Borough and 3,300 on land adjoining the Redditch urban area in adjoining districts (Bromsgrove and/or Stratford-on-Avon) between 2006 and 2026.

- 1.6 At the WMRSS2 Examination, Redditch Borough Council promoted a case in the context of the 6,600 dwellings requirement that the Borough's share should decrease to some 2,430 dwellings and the Bromsgrove District contribution should be increased to 4,170 dwellings with no provision in Stratford-on-Avon District to meet Redditch's housing needs. It is recognised that Bromsgrove District Council took a contrary view, shared by RPS, that the Redditch Borough capacity was significantly greater than 2,430 dwellings given the capacity of safeguarded land (Areas of Development Restraint) and indeed areas of Green Belt to the north west of the town with development potential which Redditch Borough Council at that time had discounted. Bromsgrove District Council would not support development of Green Belt land in its District on the edge of Redditch in the absence of proper consideration of Green Belt options in Redditch Borough.
- 1.7 The independent Panel, after a particularly thorough investigation of the area (Report para 8.80 refers), concluded that the requirement for Redditch should be increased to 7,000 dwellings of which 4,000 should be provided in Redditch Borough (including use of ADR land and areas of Green Belt) and 3,000 should be provided on a cross-boundary basis within Bromsgrove District next to the Redditch urban area. The Panel concluded at Paragraph 8.77 ***"it was universally recognised that the Borough does not have sufficient development land within its boundary to meet locally generated needs for either housing or employment given the particular characteristics of its population as a former new town"***. This conclusion evidently relates to both Redditch Borough and Bromsgrove District Councils as well as to other participants in the discussion (GOWM, WMRA and developer interests including RPS clients).
- 1.8 The Panel Report also recommended that the requirement for Bromsgrove District (unrelated to Redditch) be increased from 2,100 to 4,000 dwellings up to 2026 with a potential increase by a further 2,000 to 3,000 dwellings between 2021 and 2026 to be considered in the context of a future Core Strategy Review (Panel Report Recommendation R3.1 refers).

Cross-Boundary Joint Working

- 1.9 The Joint Redditch Growth Core Strategy consultation in early 2010 was based on the Panel's conclusions and recommendations, and focused the search in Bromsgrove District for 3,000 dwellings in an arc around the north-west and north side of the town.
- 1.10 The preparatory work for the Core Strategies, including assembling of evidence base, prior to the Redditch Growth consultation in March 2010 was undertaken jointly by Redditch and Bromsgrove Councils, and supported cross-boundary development to the north of Redditch on the edge of the urban area. Evidence base work and previous Core Strategy consultations have shown that capacity for housing delivery within Redditch is significantly constrained and that land within the Green Belt as well as deliverable parts of the ADR land need to be released due to a lack of suitable housing

sites available within the Borough to accommodate their requirements. This is also identified with the Green Belt Review undertaken by RPS and FPCR (submitted to the District and Borough Councils in December 2009). It is important to note that there have not been any other Green Belt reviews or assessments produced by any party which challenge this evidence.

1.11 It would appear that, from the silence in the Bromsgrove District Core Strategy 2 on the matter, Bromsgrove Council has now abandoned this joint approach to Redditch-related *housing* delivery with no evident rationale behind this decision. It is significant, however, that there is continued recognition of meeting Redditch's *employment* land needs on a cross-boundary basis. The latter approach to employment land is agreed by RPS to be sound and supported by evidence.

1.12 The evidence does not support the Council's current decision not to engage with cross-boundary housing growth and, therefore, the draft Core Strategy must be considered unsound. The current approach also fails on the duty to co-operate between Local Planning Authorities which has been set out in the Coalition Government's programme, the Draft Localism Bill and most recently in parallel with the March 2011 Budget where Eric Pickles (Secretary of State for CLG) has stated:

“To make sure the right land is available in the right place for development the Department will; ... place a new Duty to Co-operate on councils to work together to address planning issues that impact beyond local boundaries such as transport, housing or infrastructure”. [RPS emphasis]

1.13 There is a wide-ranging national debate within the 'planning world' over the importance of a strategic dimension in planning for future housing and economic growth. In many cases, including Redditch which is a good example, sustainable development can best be achieved through integrated joint cross-boundary planning. The WMRSS2 established this principle. The proposed abolition of RSSs through the Localism Bill does not negate the soundness of this approach and should not allow Bromsgrove District Council to disengage from the well-advanced joint working which has already taken place.

1.14 If the Bromsgrove District Council is to continue with its current approach of disallowing development within the Green Belt to contribute to Redditch Borough's housing and related requirements, RPS considers that extensive new evidence base work will need to be done to justify this approach, as currently for the Council to ignore this issue results in the Core Strategy being both ineffective and unjustified and therefore unsound.

Evidence Base

1.15 RPS recognises that in future, under the Coalition Government's Localism Agenda, it is appropriate for development needs to be determined locally (rather than through the previous RSS process). However, all such assessments must be robust and take full

account of the evidence including the tested evidence through the WMRSS2 Examination. No such alternative local assessment has been undertaken to date.

- 1.16 It is noted that Redditch Borough Council has undertaken a detailed SHLAA exercise which has concluded that the deliverable and developable capacity of the Borough in the period to 2026 on all available sites totals 3,200 dwellings. This is some 800 dwellings below the Panel's recommended requirement of 4,000 within the Borough before consideration is given to meeting the balance of need up to the full 7,000 dwellings. It is, therefore, evident that cross-boundary provision is considered necessary by Redditch Borough Council and their expectation can only be that the Bromsgrove District Core Strategy must provide for cross-boundary housing growth at the town. RPS, therefore, considers it essential that Bromsgrove District Council reconsiders this issue and the implications for development within the Green Belt in Bromsgrove District on the edge of Redditch if these needs for sustainable development are to be accommodated.
- 1.17 RPS is aware of no evidence which suggests that Redditch's needs can be fully met within the Borough area. It will be contrary to national planning policy if development plans are promoted which fail to provide for the new homes required by all objective measures. The Coalition Government is committed to increasing the delivery of new housing and to economic growth and encouraging investment (reaffirmed by the Chancellor's Budget speech and his *'Plan for Growth'* and by DCLG on 23 March 2011). It is also committed to achieving sustainable patterns of development and recognises that Local Planning Authorities must co-operate in this context (as referred to above at para 1.12). In the absence of the required co-operation, RPS concludes that Bromsgrove District Council will not be able to progress a sound Core Strategy without addressing cross-boundary housing issues and co-operating with Redditch Borough Council to deliver the housing numbers needed.
- 1.18 The December 2010 Bromsgrove District Annual Monitoring Report (AMR 2010) includes at H1 the housing target of 7,000 new dwellings for Bromsgrove Council by 2026 selecting to interpret the WMRSS Panel Report as recommending 4,000 dwellings between 2006 and 2021 and a further 3,000 between 2021 and 2026. The AMR 2010 is equally silent on the Redditch-related housing growth issues crossing the Borough boundary. Effectively, the Panel's recommendation of 3,000 dwellings to be positively allocated now to meet Redditch-related needs in Bromsgrove District has been disregarded completely. In contrast, the housing requirement for the rest of the District which has been incorporated in the AMR 2010 Housing Trajectory includes an increase of 3,000 dwellings above the 4,000 dwellings recommended by the WMRSS2 Panel. This, too, is contrary to the Panel's recommendation which indicated that any such increase should only be made through a formal Core Strategy review process. The Panel's conclusions on this point are in paragraphs 8.86 and 8.87 which state inter alia:

"We endorse the District Council's recommendation of provision for 4,000 dwellings at locally determined locations in addition to the 3,000 dwelling

provision needed to meet the needs of Redditch adjoining the town's boundary where the Green Belt adjustment would be required. [Panel's emphasis] and

"... In the next SIRS Review of the RSS and a related review of the Core Strategy, the region and the District Council should explore whether a further 2-3,000 dwellings could be sustainably accommodated within the District in the period 20021-26 even if Green Belt review were then required."

- 1.19 The Panel identified that one option for meeting all or part of such additional housing, to be considered through a Core Strategy Review, could be ***"further development on the edge of Redditch"***, potentially in combination with other options/approaches [PR para 8.87 refers].
- 1.20 The Council's approach in the AMR 2010, therefore, appears to have been founded on a misunderstanding or misrepresentation of the WMRSS2 Panel's Report.
- 1.21 PPS3 states that both local and regional housing requirements should be determined by taking into account a range of evidence including local and sub-regional results published in documents such as SHMA's and SHLAA's, and that the overall level of housing provision distributed among Local Authority areas should be set out within Regional Spatial Strategies.
- 1.22 The extensive evidence base underpinning the WMRSS Panel Report supports the housing requirement for Redditch of 4,000 dwellings in Redditch Borough and 3,000 dwellings in Bromsgrove, including the 2009/10 SHMA update published in December 2010.
- 1.23 Since the previous Core Strategy Growth Options consultation in March 2010, the ONS 2008-base household projections were published in November 2010, which projected an increase of 4,000 households in Redditch Borough between 2008 and 2028, predicting a lower figure, therefore, for the 15 year Core Strategy plan period than indicated by previous projections. This clearly relates only to a headline household growth level and not a housing requirement. To reduce the Redditch requirement below the scrutinised level recommended by the WMRSS Panel of 7,000 dwellings between 2006 and 2026, based on a headline from the 2008 Household Projections and in the absence of any strategic policy input or consideration of other factors, issues and longer term trends, will be inappropriate.
- 1.24 As identified above, PPS3 states that local housing requirements should be determined by taking into account a range of evidence including local and sub-regional results published in documents including Strategic Housing Market Assessments (SHMAs) and Strategic Housing Land Availability Assessments (SHLAAs), in the context of setting the overall level of housing provision to be distributed among Local Authority areas. Although, PPS3 refers to this being undertaken through Regional Spatial Strategies, as required by current legislation, this will require to be undertaken by Local Planning Authorities in future in conjunction with the 'duty to co-operate' between authorities

where spatial planning issues cross administrative boundaries (as is the case at Redditch).

- 1.25 Even though the Government's intention is to introduce legislation whereby Regional Strategies will be abolished, the SHMA recognises that the evidence base work undertaken for the WMRSS remains valid:

“This monitoring report has included the housing proposals from the EiP Panel Report for information as a lot of the evidence base and technical work conducted for RSS Revision remains valid and will be used to inform the new local planning frameworks” [Worcestershire SHMA Update December 2010, page 15 refers]

- 1.26 The SHMA 2010 Update for Worcestershire records the 'backlog' of unmet housing need in Redditch Borough (Table 25 refers) as some 1,540 households. If the strategy were to address this backlog over a 15 year period, there will be a need to add 100 dwellings to annual net additional housing requirement at Redditch. The SHMA report favours seeking to address the backlog within 5 years. Addressing the backlog is additional to dealing with newly forming need as it arises over the plan period.
- 1.27 It is universally acknowledged that the evidence base documents before the WMRSS Panel support a higher housing target for Redditch for 2006 to 2026 than the Borough's identified capacity. A longer plan period beyond 2026 now needs to be considered.
- 1.28 Therefore, as previously stated, it has been identified that a cross-boundary approach to housing delivery is required with Bromsgrove to meet the housing needs of Redditch, and therefore the Local Planning Authority must include reference to this within the Bromsgrove District Core Strategy if it is to be capable of being found to be sound.
- 1.29 The most recent Examination in Public of a now adopted Core Strategy within the West Midlands was for Shropshire Council in November 2010. Shropshire Council had proposed the inclusion of the increased housing target for Shropshire recommended by the WMRSS Panel Report which was based on the full available evidence base in summer 2009 to identify current and future housing need. The Core Strategy was submitted in July 2010 after the General Election, the consequent change of Government and the Secretary of State's decision on 6 July 2010 to revoke existing RSSs (since quashed by the High Court on 10 November 2010). The Council did not revert to the lower proposed housing requirement in the submitted WMRSS.
- 1.30 The Inspector's Report, published in February 2011, concluded that the subsequent publication of the ONS 2008-base household projections (which indicated a lower projection of households) was not, as ***“a single snapshot of data, without any strategic policy input or consideration of other factors, issues and longer term trends”***, an appropriate base for a 15-year plan [Shropshire Core Strategy Inspector's Report paragraph 14 refers].

- 1.31 The Inspector went on to conclude that the target within the WMRSS Panel Report was ***‘soundly based and appropriate.’*** The Shropshire Core Strategy has since been adopted. The Black Country Core Strategy has also been adopted on the basis of the WMRSS2 Panel’s recommended housing requirement.
- 1.32 It is noted that a recent appeal decision (21 February 2011) in Bromsgrove District on land to the rear of Brook Crescent, Hagley (APP/P1805/A/10/2136206) hinged on housing land supply. The Council’s evidence presented evidence on housing requirements based on the WMRSS2 Examination Panel’s Recommendations which led to a supply of only some 2.2 years. The Inspector concluded this was an appropriate basis for assessing requirements in that case (paragraphs 7 to 9 of the decision refer).
- 1.33 Further, it is appropriate to examine the regional and sub-regional context further. The WMRSS Panel endorsed a spatial strategy where significant housing overspill particularly from Birmingham would be accommodated in targetted areas through the Settlements of Significant Development (SSDs) policy. It is clear in the West Midlands that the level of housing shortfall resulting from the Birmingham Core Strategy of some 30,000 to 35,000 dwellings between 2006 and 2026 below even the reduced 2008 based household projections will not be redressed through Core Strategies across the region. Birmingham City Council has reduced their housing targets by 6,900 dwellings from the proposed requirement set out in the Panel Report.
- 1.34 Indeed, several Local Planning Authorities in the region are proposing now to reduce their housing targets which would otherwise under the emerging WMRSS2 have accommodated a proportion of Birmingham’s housing requirements, therefore constraining future growth of the City and out-migration to surrounding areas. RPS recognises that it was not proposed by the Panel that Redditch should contribute to the housing requirement for Birmingham in favour of other locations, notwithstanding the recommendation by independent consultants to the previous Government (Nathaniel Lichfield & Partners) that some 2,500 additional dwellings could be directed to Redditch. However, given the communication links between Redditch and Birmingham, and the affordability of the town compared with other locations, RPS considers it is likely that the serious under-provision of new homes in Birmingham and the more distant SSDs will place additional development pressure on Redditch.
- 1.35 RPS contends that in the absence of any detailed reassessment, it remains appropriate that the Redditch Borough Core Strategy seeks to maximise housing delivery in the Borough towards its recommended level of 4,000 dwellings between 2006 and 2026 and that there is collaborative cross-boundary joint working with Bromsgrove Council to identify further land on the edge of the town to accommodate the balance of the 7,000 dwellings as recommended in the Panel Report.
- 1.36 RPS understands that Worcestershire County Council is undertaking an assessment of dwelling requirements over the period from 2006 to 2031 for the Redditch Borough which will be used as additional evidence base for the Redditch Core Strategy and

which will be used in any representations by Redditch Borough Council on the Bromsgrove District Core Strategy. RPS does not have access to this information and therefore reserves its position to comment on this in the context of both the Redditch Borough and Bromsgrove District Core Strategies at future stages of the process.

Brockhill West, Redditch

- 1.37 The evidence therefore demonstrates a strategic requirement which is well in excess of the deliverable capacity of Redditch Borough and there remains a compelling need for cross-boundary allocation of land within Bromsgrove District. Brockhill West is considered to be a highly sustainable location for some 1,100 dwellings in Bromsgrove District in the coming plan period, complementing the Redditch Borough proposed Strategic Site (Reference Policy 30) allocation in this location and contributing towards the overall housing requirement to be provided.
- 1.38 A comprehensive site specific evidence base portfolio has been provided to Bromsgrove District demonstrating the suitability, availability and deliverability of the land to accommodate a sustainable urban extension in October 2010 with an update relating to drainage considerations in January 2011. A Green Belt Review undertaken by RPS with FPCR (Landscape Consultants) was also submitted to the District Council in December 2009 concluding that the Brockhill West area can acceptably be removed from the Green Belt without unacceptable impact on Green Belt functions in the area.
- 1.39 Because of the evident need for cross-boundary co-operation it is essential that the Bromsgrove Core Strategy makes proper reference to co-ordinated delivery of development where land in Bromsgrove District adjoins allocated land in Redditch Borough contiguous with the district boundary as at Brockhill West.

Core Policy 1

- 1.40 **Core Policy 1** of the draft Bromsgrove Core Strategy indicates that the Local Planning Authority is now proceeding on the basis of the recommended target of 4,000 dwellings within the rest of Bromsgrove District, as recommended in the Panel Report. RPS supports this housing target for the rest of the District, accommodating all of the housing within the urban area and existing Areas of Development Restraint without needing to review the Green Belt boundaries.
- 1.41 The policy goes on to state that the Core Strategy will undergo a partial review by 2021 to assess the suitability of providing a further 2-3,000 dwellings, which may include review of the Green Belt, for the remainder of the plan period as a greater number of homes may be predicted to be required. Again, RPS supports the Local Planning Authority's consideration for additional housing in the rest of the District during the plan period through a Review process as recommended by the WMRSS Panel.
- 1.42 In these respects, Core Policy 1 departs from the 2010 Bromsgrove DC AMR approach to housing requirements.

- 1.43 As there is no mention of joint working with Redditch Borough Council and cross-boundary housing delivery at Redditch, and as the Core Strategy implies that none of the currently proposed housing will contribute to the housing targets for Redditch, RPS objects in the strongest possible terms to the current omission. The objection is on the grounds that the evidence supports the need for cross-boundary housing growth, including the submitted WMRSS2 and the more recent Panel Report, on which the rest of Core Policy 1 is based.

Green Belt Boundary

- 1.44 Bromsgrove District Council will be aware that Redditch Borough Council is proposing to alter the Green Belt boundary at Brockhill West and Brockhill East to accommodate required development in the current plan period. One option could be to align the altered Green Belt boundary along the Borough boundary in both cases.
- 1.45 However, given the identified need for further development at Redditch, there are concluded by RPS to be exceptional circumstances to *require* (using the terminology of the WMRSS2 Panel) a Green Belt boundary review around Redditch in Bromsgrove District (Panel Report paragraph 8.86 refers).
- 1.46 Further, PPG2 clearly requires consideration to be given to the potential requirement to safeguard land for longer term development requirements as part of the process of redefining Green Belt boundaries. In this case there is a recognised need to redefine the boundary and, under the duty to co-operate, RPS contends this should obligate Bromsgrove District Council to consider the definition of the new Green Belt boundary having regard to the immediate requirement for development and the potential requirement for longer term development for which land should be safeguarded.
- 1.47 As stated above, RPS and FPCR have undertaken a comprehensive study of the Green Belt fringe around the north side of Redditch from Web Heath in the west to Mappleborough Green in the east. The December 2009 Study identified land where development could be accommodated without unacceptable impact on Green Belt functions. Plan RPS2 identifies the Green Belt boundary alteration concluded to be appropriate in the area between A448 and A441 where the greatest potential for development has been identified in this context. It would therefore be appropriate for land which is not required to be allocated to meet development needs at Redditch in the current plan period to at least 2028 to be safeguarded as a new Area of Development Restraint, consistent with PPG2 policy.
- 1.48 The Core Strategy must address this issue either through a clear policy relating to Green Belt boundary review in conjunction with a strategic location for an Urban Extension proposal, or through a Proposals Map defining a strategic site allocation at Brockhill West and an Area of Development Restraint.
- 1.49 RPS is not aware of any criticism of the submitted December 2009 Green Belt Review Study or of any alternative assessment which has drawn different conclusions.

Plan Period

- 1.50 It was evidently the case that the District Council had intended to progress its development plan to adoption whereby a full 15 years of the plan period would have remained from adoption in the context of a 2026 end date. However, the delays to the process resulting from the timing of the WMRSS2 Examination and the change of national Government (which caused uncertainty over the timing of RSS revocation, the duty to co-operate and effect of a 'localism' approach) will mean that the Bromsgrove District Core Strategy will not be adopted in all probability until after March 2012 at the earliest. Accordingly, the plan period for the Core Strategy, to comply with national planning policy in PPS12 and PPS3, should extend to at least March 2028. This will require an assessment of housing and employment land requirements up to at least that date.
- 1.51 This requirement also applies to Bromsgrove District's consideration of cross-boundary development. On the basis that the great majority of Redditch Borough's capacity is likely to be taken up well before 2026, the increased requirement over the extended period is more likely to affect the scale of Redditch-related development to be provided in Bromsgrove District on the edge of the town rather than through finding additional capacity in Redditch. This matter will need to be properly assessed jointly through the evidence base for the Core Strategies. A joint SHLAA exercise relating to Redditch should be undertaken in RPS's view.

Core Policy 7 Affordable Housing

- 1.52 With regards to the Council's affordable housing requirements, RPS notes the target of 40% affordable dwellings on sites of 5 or more dwellings or larger than 0.2ha. The Core Strategy does not refer to evidence that demonstrates that this level of provision is generally viable on development sites in the District which is a requirement of national planning policy.
- 1.53 Further, the Council proposes to seek that two thirds of the affordable housing requirement is to be social rented properties, with only one third intermediate housing. As with the overall target requirement, RPS does not accept this split as there does not appear to be any viability assessment done by the Council to justify this requirement which may be likely to threaten the deliverability of proposed developments. Further research needs to be undertaken to justify this approach for the policy to be sound.

Core Policy 8 Homes for the Elderly

- 1.54 The first part of Core Policy 8 is more of an objective than a policy in terms of encouraging the development of new homes to 'lifetime homes' standards in particular to meet the needs of people with disabilities and the elderly.
- 1.55 It is acknowledged that these standards may be required for all new dwellings by 2013 by national policy (Core Strategy paragraph 7.79 refers). However, the policy does not

refer to the timing of the introduction of this provision. Clearly, in the interim there will be no national policy requirement in place. Local policies should not seek to introduce earlier introduction of standards ahead of national policy without exceptional local justification.

- 1.56 It is understood that the Government will be revising the Code for Sustainable Homes levels and the approach to 'lifetime homes' prior to 2013, and therefore any deviation from the Government's timetable would be inappropriate. This is relevant, in particular, as the sales price implications and resistance for new homes will be significant for developers, and would impact upon marketing and viability of developments. Eric Pickles (SoS for DCLG) has identified the adoption of ***"a new, less costly zero carbon standard for all homes built after 2016"*** where ***"the new standards pave the way for the green transformation of Britain's homes"*** as one of four key elements intended to simplify and speed up the planning system and reduce the regulatory and other burdens on the house building industry (23 March 2011 announcement).
- 1.57 RPS therefore considers that the basis of this policy should be revisited in the knowledge of the Coalition Government's new proposals for Sustainable Homes including addressing the lifetime needs issue.

Core Policy 19 Climate Change

- 1.58 Similar concerns relate to Core Policy 19 as to Core Policy 8 in respect of climate change and sustainable construction.
- 1.59 Core Policy 19 states that for large-scale developments the Council will seek negotiations with developers regarding the viability of meeting the equivalent level of the Code for Sustainable Homes for social housing and BREEAM 'very good' rating or higher. It then goes on to say that this would be used to inform the design of all further developments brought forward for that area.
- 1.60 As stated above, the Government is actively revisiting this area of policy recognising that it places a burden on the house building industry which should be reduced.
- 1.61 RPS does not consider this policy to be appropriate as it promotes the delivery of market housing at the same Code for Sustainable Homes level as for social housing. This goes against the purpose of introducing higher standards for affordable housing as a basis for testing before standards are set for wider introduction. This will also impact upon land values which may affect deliverability of housing sites and alter the housing trajectory. There does not appear to have been any evidence undertaken which addresses this issue and the potential implications of following this 'aspirational' approach. RPS considers an evidence base is required. Accordingly, in the absence of any supporting evidence, the policy is considered to be unsound.

Key Diagram

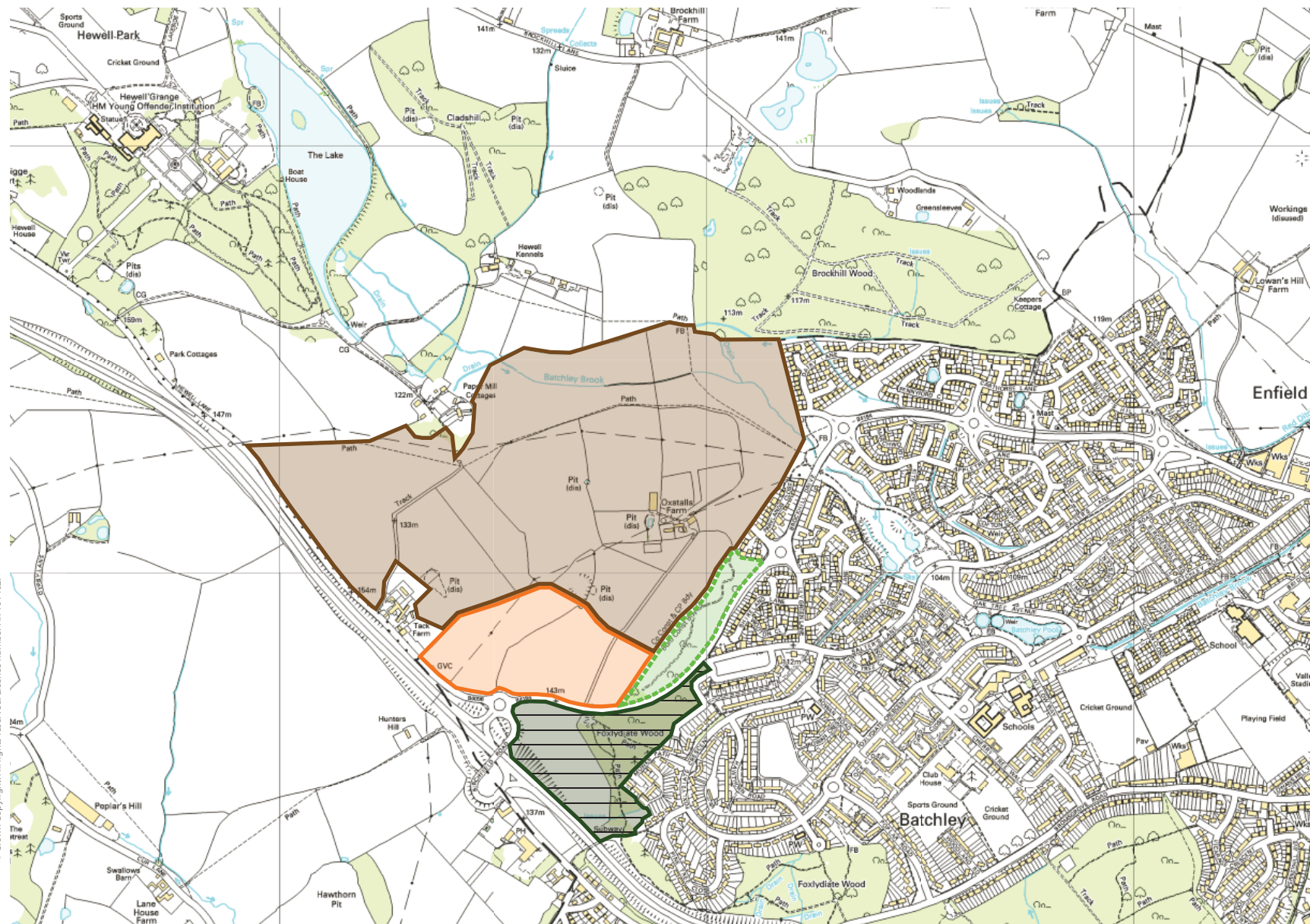
- 1.62 The Key Diagram no longer includes any reference to cross-boundary development at Redditch. RPS is strongly of the opinion that this must be rectified if the Bromsgrove District Core Strategy is to be found sound.

2 CONCLUSIONS

- 2.1 Miller Strategic Land, Persimmon Homes and Southern & Regional Developments support the housing target for Bromsgrove District of 4,000 dwellings, with the possibility of a further 2-3,000 dwellings being build towards the end of the plan period to be determined through a formal Review in due course. This requirement 4,000 dwellings requirement is agreed to meet the needs of the District and is not intended to meet any element of cross-boundary growth requirements at Redditch.
- 2.2 RPS's Clients strongly object to the omission of proposals to address the requirement for cross-boundary growth at Redditch in the Draft Bromsgrove District Core Strategy in the context of compelling evidence justifying this approach.
- 2.3 Accordingly, the Core Strategy is considered to be **unsound** as it does not propose to include any of the allocation for Redditch-related needs identified through the submitted WMRSS2, confirmed by the Panel Report on the WMRSS2 Examination, and most recently identified in the Joint March 2010 Core Strategy Consultation. There is a compelling evidence base which justifies the need for cross-boundary joint working. This is further compounded by the more recent evidence base through the Redditch SHLAA that the Borough's deliverable capacity to 2026 is some 3,200 rather than 4,000 dwellings recommended in the WMRSS2 Panel Report.
- 2.4 The Plan Period is required now to be extended beyond 2026. This will add to the development requirements at Redditch in the plan period.
- 2.5 Cross-boundary locations are required to contribute towards the much needed housing for Redditch Borough. The technical evidence adduced by RPS in the Brockhill West Portfolio and the Redditch Green Belt Review demonstrate that Brockhill West is an entirely appropriate location where cross-boundary development can be brought forward.
- 2.6 Brockhill West is already being proposed as a strategic housing site within the Redditch Core Strategy for 150 dwellings and 2.5 ha of employment land. There are clear references in the Redditch Core Strategy that the development of the land may have implications for the adjoining area in Bromsgrove District. A further 1,100 dwellings can be sustainably provided in this location within Bromsgrove District, to contribute to the housing requirement for Redditch.
- 2.7 The land can appropriately be removed from the Green Belt having regard to the development needs of the area which provide exceptional circumstances for alteration of the Green Belt boundary as required by PPG2 policy guidance and confirmed by the WMRSS2 Panel and the emerging Redditch Borough Revised Draft Preferred Core Strategy (January 2011).

- 2.8 RPS therefore recommends that the Local Planning Authority includes cross-boundary urban extension proposals at Redditch within its Core Strategy in respect of housing, as well as the existing employment land proposal extending the Ravensbank Business Park, and acknowledging the need to revise Green Belt boundaries to enable this development.
- 2.9 RPS considers Brockhill West to be a most sustainable location around the town for expansion (in agreement with Redditch Borough Council), where the same considerations apply to adjoining land in Bromsgrove District. Accordingly, to meet cross-boundary development requirements, Brockhill West should also be shown on the Bromsgrove District Core Strategy Key Diagram as an Urban Extension location at Redditch. The site identified on Plan RPS1 should be identified as a strategic site allocation (on the Proposals Map) or as a strategic location for 1,100 dwellings and associated infrastructure in the plan period.
- 2.10 In redefining the Green Belt boundary, PPG2 advice should be applied whereby land is safeguarded for potential longer term development needs beyond the plan period. Plan RPS2 provides an alternative Green Belt boundary between A448 and A441 and identifies the boundary of an Area of Development Restraint (ADR or safeguarded land) in accordance with PPG2 policy between Brockhill East and Brockhill West.
- 2.11 The plan period needs to be extended at least until 2028 to ensure at least 15 years of operative period beyond the date of adoption of the plan. Development requirements need to be assessed in the context of the extended development plan period.
- 2.12 RPS will welcome the opportunity to discuss these representations with officers of Bromsgrove District Council.

PLANS



KEY

- Revised Policy 30 Strategic Site Boundary
- Adjoining Brockhill West land in Bromsgrove District (suitable for comprehensively planned development)
- Foxlydiate Wood and Local Nature Reserve
- Community Woodland

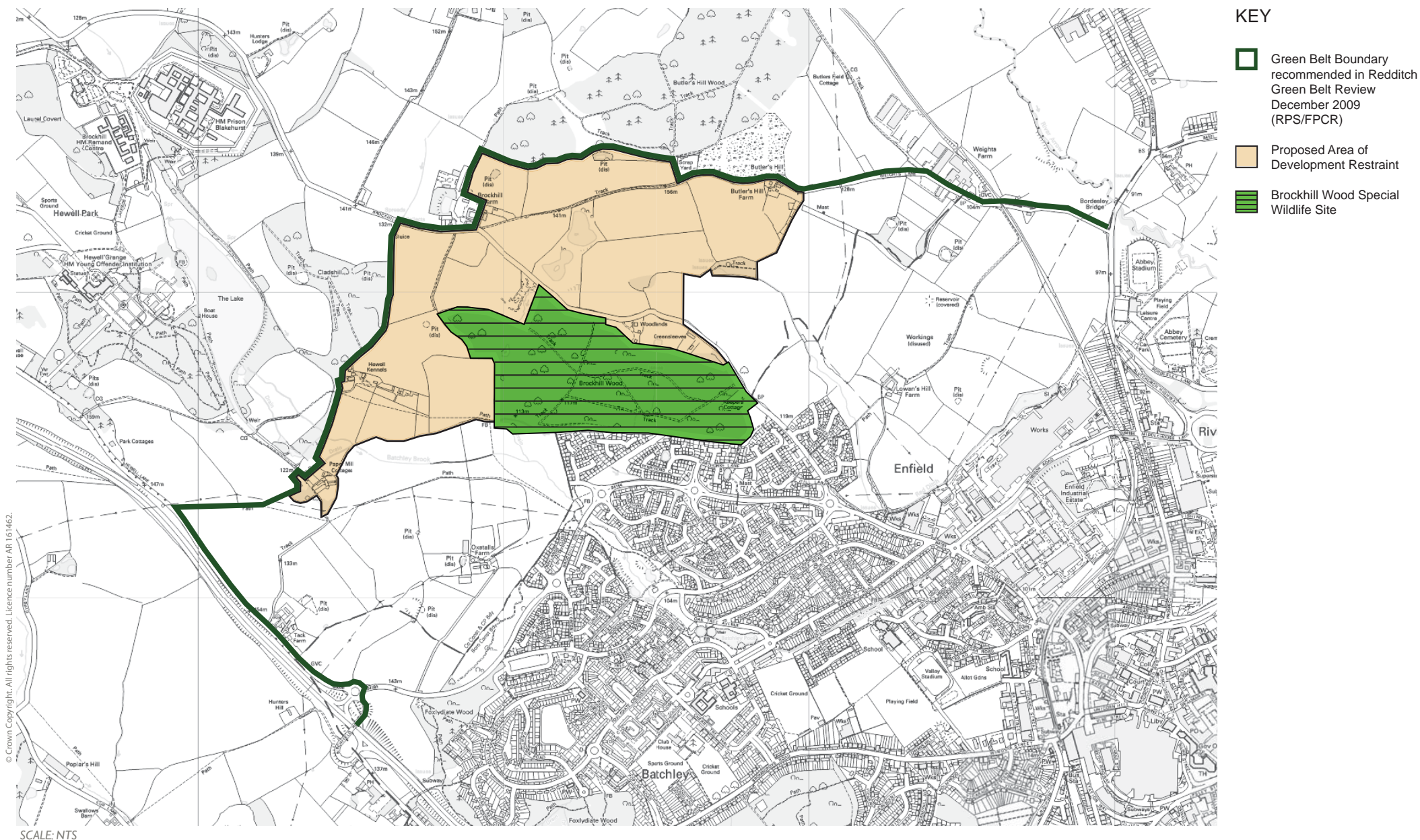
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 DATE CHECKED: 01/03/11
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