

**Redditch Borough Council Response to the
West Midlands Regional Spatial Strategy
Phase Two Revision
Spatial Options
8th January - 5th March 2007**

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Introduction

This document is the response from Redditch Borough Council to the West Midlands Regional Spatial Strategy (WMRSS) Phase II Revision. The response was agreed at full Council on 26 February 2007. Prior to full Council the RSS Revision was considered at the following Committees:

Environmental Overview & Scrutiny	-	17 January 2007
Environmental Overview & Scrutiny	-	19 February 2007
Executive	-	21 February 2007.

Consultation associated with the Phase II RSS Revision is the responsibility of the Regional Assembly (RA). However in addition to the consultation exercises organised by the RA and Worcestershire County Council, Redditch Borough Council has undertaken the following public consultation:

- Public Notice in Redditch Standard - (26 January 2007)
- Press Release - (22 January 2007). The press release resulted in news items in the local press (24 & 26 January 2007):
- Neighbourhood Group Meetings – These meetings were held throughout February and covered all neighbourhoods in the Borough of Redditch. The RSS Review was an agenda item at every Group meeting; as Redditch Borough Council considers this Review to be a town-wide issue for its residents. There was a Planning Officer in attendance at five Meetings.
- Public meeting 22 February 2007 (90 attendees).
- Website - Details of the consultation opportunity were placed on the Council's website for the duration of the consultation period complete with a weblink to the RA website.
- Letters were written to all people/organisations on the Council's database who had expressed an interest in being contacted on matters associated with planning policy formulation.

Questionnaire on: Spatial Options - Housing

H1: What overall level of new housing development do you think is appropriate to plan for across the Region?

Options	Level of Demand 2001-2026 (gross)	Yes	No
One	381,000		
Two	491,200		
Three	575,000		

Redditch Borough Council considers it inappropriate to comment in detail on the overall levels of new housing development across the Region due to limited knowledge regarding any district other than its own.

However, in general terms the Council considers that the level of new housing development across the Region should be achieved without compromising Spatial Strategy objectives (WMRSS, para 3.14). This is particularly important as the Phase Two Revision document clearly states that the Vision, Principles and Objectives of the WMRSS will not be changed (Pg 16 Spatial Options). If the overall level of new housing development compromises WMRSS objectives in individual districts then a partial review of the WMRSS is not an appropriate mechanism for dealing with such a significant policy shift. With the future growth of Redditch Borough in mind, Redditch Borough Council has concerns that both Options 2 and 3 compromise WMRSS objectives in its district. If all of Option 1 is accommodated in the existing urban area and ADR then the difference between Option 1 and Option 2 (4,000 dwellings) or the difference between Option 1 and Option 3 (9,000 dwellings) would need to be accommodated on 100% Green Belt land within the Borough and/or within the Green Belt of adjoining districts. It should also be noted that the proposed employment target (i.e. a reservoir of 7 - 8 ha per 5 year period would also have implications for the Green Belt. Such a large amount of development on Green Belt land at a location which is not recognised as a focus for development is at odds with the following WMRSS objectives:

- a) to make the MUAs of the West Midlands increasingly attractive places where people want to live, work and invest.
- c) to create a joined-up multi-centred Regional structure where all areas/centres have distinct roles to play.
- d) to retain the Green Belt, but allow an adjustment of boundaries where this is necessary to support urban regeneration.

- e) to support cities and towns in the region to meet their local and sub-regional development needs.
- i) to promote the development of a network of strategic centres across the Region.

It is also noted that the levels of development under Options 2 and 3 for Redditch Borough are also at odds with the stated priority in the Phase Two Revision document which is for the development of brownfield land in sustainable locations before the development of greenfield land (Pg 32 Spatial Options).

It is appropriate to plan for an overall level of housing development that does not compromise WMRSS objectives in individual districts. In relation to Redditch Borough, Option 1 is the only option that is compatible with WMRSS objectives. Development above Option 1 will require rolling back of Green Belt on a significant scale. 4,000 dwellings plus employment land is considered at odds with WMRSS objectives but some development in Green Belt (i.e. development above Option 1) may be compatible with WMRSS objectives but would conflict with PPG2 guidance on Green Belts which is to keep land permanently open (Para 1.4 PPG2).

However, Redditch Borough Council considers that comments relating to Redditch Borough and its position within the Region would provide a more appropriate approach to its response to this consultation period and details these comments under its response to question H7.

H2: Can you suggest another level?

There needs to be robust evidence to support it.

As stated under question H1, Redditch Borough Council considers it inappropriate to comment on the overall levels of new housing development across the Region as a whole due to limited knowledge regarding any district other than its own. Issues relating specifically to Redditch Borough and projected growth are responded to under question H7. Options 2 and 3 are not appropriate for Redditch Borough in the context of WMRSS objectives - although some development in the Green Belt beyond the level of development in Option 1 may be acceptable from a WMRSS policy perspective.

H3: For each of the Options do you think that the balance of development between the MUAs and other areas is acceptable?

Please see Table One on page 24 and the section on housing distribution for a more detailed breakdown of the numbers to Local Authority level.

Redditch Borough Council is of the opinion that altering the balance of development between the MUAs and other areas is not acceptable.

As stated on page 22, Spatial Options document, 'Ratios', the principle of the WMRSS is to achieve a ratio of 1:0.7 between the MUAs and other areas by 2021. Options 1, 2 and 3 alter this balance significantly as demonstrated on the table below, which is against the WMRSS principles of urban renaissance and assumes that other areas have more potential to deliver development which is not demonstrated.

Options	Balance of development in MUAs	Comment
One	53% MUAs 47% other areas	This ratio is equivalent to 1:0.89
Two	51% MUAs 49% other areas	This ratio is equivalent to 1:0.96
Three	50% MUAs 50% other areas	This ratio is equivalent to 1:1

Paragraph 6.4 of RPG11 states that the MUAs are failing to provide the attractive choice of home and community environments needed to encourage economically active and independent households to stay. The issue to be addressed is about making the MUAs more attractive. Altering the balance of development ratios away from the favoured approach of providing more development in MUAs by 2021 will undermine the WMRSS objective, "to make the MUAs of the West Midlands increasingly attractive places where people want to live, work and invest" (WMRSS, para 3.14). Indeed Options 2 and 3 are likely to reverse this objective. The Spatial Options document indicates in several places that too much provision within surrounding areas could increase level of out migration and undermine successful regeneration of the conurbation.

If the approach of the WMRSS is to create a variety and choice of good quality housing within the MUAs (Policy CF1) and to increasingly meet their own generated needs, then Redditch Borough Council believes that the 1:0.7 ratio between MUAs and other areas should be maintained irrespective of which growth Option is being considered. If each Option was proportioned using the 1:0.7 approach, the overall totals in Table One (Page 24 of the Spatial Options document) should resemble the following:

	Option 1	Option 2	Option 3
MUAs	202,400 (53%) 224,790 (59%)	251,400 (51%) 289,808 (59%)	289,200 (50%) 339,250 (59%)
Other Areas	179,000 (47%) 156,210 (41%)	239,800 (49%) 201,392 (41%)	285,800 (50%) 235,750 (41%)
West Midlands Region	381,000	491,200	575,000

If the ratio is diverted away from development in the MUAs, the consequence would be an increase of development on greenfield sites which in the case of Redditch Borough, would lead to developing on Green Belt land, which is contrary specifically to the WMRSS objectives a & d, on page 16 of RPG11. In the time it would take to bring forward land for development in Redditch Borough where there are infrastructure issues, the MUAs could be made more attractive locations for the economically active and independent households. For each of the Options, the balance of development should not deviate from the ratios in the existing WMRSS i.e. a ratio of housing provision between the MUAs and other areas of 1:1 by 2011 and 1:07 by 2021.

H4: Do you think that the capacity of the construction industry, including housebuilding, will be sufficient to meet the levels of housebuilding set out in the housing Options?

Options	Level of Household Growth Required 2001-2026		Yes	Comment
	Gross	p.a		
One	381,000	15,200	✓	See Below
Two	491,200	19,600	X	See Below
Three	575,000	23,000	X	See Below

Redditch Borough Council is unable to provide comments on the capacity of the construction industry across the Region as a whole, therefore comments relate specifically to anticipated build rates within Redditch Borough.

Redditch Borough Council would expect the build rate of Option 1 to be achieved. The build rate for Option 2 could, in principle, be achieved but it is likely to be compromised by major infrastructure issues and the possible need for cross-boundary working. Option 3 also has infrastructure and cross-boundary issues. However in addition to those issues, the Borough Council queries the expectancy to consistently reach a build rate of 528 dwellings per annum for Option 3 (Table Two, page 25, Spatial Options document).

It should be noted that during the Plan period for the Borough of Redditch Local Plan No. 2 (BORLP2) (1986 - 2001), an agent for house builders in Redditch informed the Inspector at the Public Local Inquiry (1992) that they could provide 1300 dwellings on greenfield land by the end of the Plan period in 2001. In reality, this site was not completed until 2006, some five years beyond the expected delivery period. The delay was due to the need to provide major infrastructure for this site and consequently housing development did not begin until 1996. This site alone should have provided a build rate of 260 dwellings per annum to meet the target of completion by the end of the plan period in 2001. In reality, only 130 dwellings per annum were actually achieved.

The above example raises strong concerns for Redditch Borough Council with regard to realistic delivery periods for large housing allocations, as major infrastructure provision would impair new-build delivery rates. The Option 2 average annual build rate for Redditch Borough of 328 dwellings per annum would not be achievable during the earlier part of the plan period as there would be no construction during the years where provision for infrastructure was being made. This would then make the annual average build rate for the remainder of the Plan period higher than could reasonably be accomplished. This argument is reiterated for Option 3 build rates which Redditch Borough Council considers even more difficult to achieve.

Redditch Borough Council does not think that the capacity of the construction industry, including house building, will be sufficient to meet the levels of house building set out in Options 2 and 3. As stated in the Council's response to question H3, it is likely that there is

more potential to make the MUAs more attractive places to live by 2026 than to bring forward sites without infrastructure in the Green Belt that are likely to require cross-boundary working.

There is an issue regarding skills shortages in the UK construction industry. The construction skills network report 'Blueprint for UK construction 2006-2010' forecasts that UK construction output is set to average 3% growth annually between 2006 and 2010. At the end of 2006 just over 2.5 million people were expected to be employed in construction across all occupations. It predicts that in order to deliver this growth, the amount of workers needed is likely to increase by approximately 245,000 throughout the UK. This will mean that an average of 88,000 new recruits will be required each year.

In 2005, the Chartered Institute of Building (CIOB) carried out a pilot survey on skills shortages which found that 91% of respondents anticipated that there would be skills shortages beyond 2005. It also found that 65% of respondents felt that the workforce was not sufficiently skilled. This was a small scale study; however it strongly suggested a need for further research in this area. These findings were supported by the London Annual Business Survey 2005 which found that a lack of skilled workers was the biggest factor affecting the performance of businesses in London. It found that construction was one of the industries most affected by this.

Based on the Chartered Institute of Building's annual skills shortage survey, 77% of construction and building firms had problems recruiting new staff in 2006 and 72% also expect the demand for construction workers to increase over the coming year. Recruitment difficulties were cited at all levels in the building industry, but the greatest issues were reported at both management and craft/trade levels.

68% of workers believe the existing workforce is not sufficiently skilled. Redditch Borough Council believes that Regional agencies within the West Midlands would need to allocate more money to train local people to acquire skills within all aspects of the construction industry.

H5: What measures could be included in WMRSS policy to minimise these impacts?

(Any new house building will put pressure on environmental resources in the Region and have the potential to increase carbon dioxide emissions. However an element of new house building is essential to meet the ongoing housing demands of the population.)

Redditch Borough Council agrees that an element of new house building is essential to meet the ongoing housing demands of the population, but does have concerns regarding the environmental impact both at Regional and District level.

Redditch Borough Council would welcome the addition of stringent environmental policies to the WMRSS as current policies, which are outlined in the Worcestershire County Structure Plan and are used for guidance by Redditch Borough Council, will not be 'saved' to cover the period of the WMRSS. Redditch Borough Council wishes to see policies which would provide guidance on the following:

- Prudent use of natural resources including specific targets for on-site renewable energy provision;
- Care for the environment;
- Use of previously developed land;
- Minimising the need to travel;
- Achieving balanced communities;
- Implementation of development;
- The sustainable location of development;
- Landscape character;
- Development in sustainable rural settlements;
- Promotion of Town Centres, District Centres and Local Centres.

Such policies should provide a robust policy framework which would underpin the WMRSS objectives of moving towards a more sustainable Region. They should be measurable, monitorable, enforceable and provide strong guidance which goes further than broad-brush guidance i.e. set specific standards such as the Merton Rule. Local authorities should be

encouraged, through these policies, to produce robust local policies about environmental issues in Core Strategy DPDs.

Fundamentally however, Redditch Borough Council points out that new employment development should be provided in the locations identified for new housing development and at an appropriate scale to ensure that there is a sustainable balance created between new housing development and new employment development. An appropriate balance between housing and employment development increases the probability of people being able to live and work in the same settlement and therefore reduces the need for travel from one settlement to another for employment purposes. For a given settlement, e.g. Redditch, it does not make sense from a sustainable development perspective to base employment options on past trends and to base housing options (e.g. Option 3) on a policy shift that would assume in-migration of new households from the conurbation.

To minimise pressure on environmental resources and to minimise carbon dioxide emissions the suggested environmental policies need to be included in the WMRSS and also housing and employment development needs to be provided in balance in settlements.

Redditch Borough Council would like to see improved access to public transport as this will make an invaluable contribution to the creation of a thriving and sustainable West Midlands.

Advantage West Midlands' West Midlands Towns Intervention Study on Redditch Borough states, 'Public transport within Redditch is generally good. Public transport from Redditch to other areas only really exists between Redditch and Birmingham. Redditch sits at the end of the cross city railway line to Birmingham. Public transport to any other area is either impossible, infrequent and/or requires a number of changes.'

Any new housing growth within Redditch Borough and across the rest of Worcestershire will have to be complemented with significant investment in the public transport infrastructure to reduce the likelihood of increased carbon dioxide emissions due to changes in travel to work patterns.

Redditch Borough Council considers that there needs to be better public transport systems to connect people to employment, education, skills and training opportunities within Worcestershire and the Region. It has been recognised through national studies that poor access to public transport can have an impact on jobs, education and training. This undermines Government objectives that are essential to combat poverty and social exclusion like welfare to work, raising educational participation and attainment, narrowing health inequalities, and reducing crime and anti-social behaviour.

H6: Table One and Table Two on page 24+25 show new housing development across all local authorities in the Region. What do you think about the overall balance of proposals under each of the Options?

Redditch Borough Council would like to raise the following points about the overall balance of proposals under each of the options:

- (i) **Districts that volunteered for more housing should have proportionately higher targets.**
- (ii) **Housing targets should reflect the ability of a district to accommodate its target.**
- (iii) **The balance of proposals should reflect WMRSS objectives (e.g. with regard to urban renaissance).**
- (iv) **All natural growth should be met where it arises unless it can be demonstrated that this is not deliverable.**
- (v) **Rationale for proposals beyond natural growth requirements should be clear.**
- (vi) **The overall balance of proposals should be under-pinned by robust data.**
- (vii) **Comparable settlements, in policy terms, should receive similar proportions of new development.**

Each of these issues is considered in turn below:

- (i) **Districts that volunteered for more housing should have proportionally higher targets**

Pg 10 - Spatial Options Consultation Paper - New Growth Points, states that the MUAs and most of the sub-regional foci volunteered as New Growth Points to promote house building should be at least 20% above levels in the current WMRSS.

Redditch Borough Council would expect the percentage increase of dwellings between Option 1 and Options 2 and 3 allocated to Growth Points to be significantly higher than allocations to other areas, and furthermore, that the percentage increase of allocations to Growth Points be consistent with other Growth Points. This does not appear to be the case. For example, with respect to the MUAs and sub-regional foci, the figure for Rugby (Option 2) is some 84.5% increase in the number of dwellings from Option 1, whilst Shrewsbury and Atcham has been allocated a 10.1% decrease between Options 1 and 2 and Birmingham has only an 18% increase for the same Option.

(ii) **Housing targets should reflect the ability of a district to accommodate its target**

Accuracy of base data

Redditch Borough Council queries the accuracy of the base data used in the preparation of the Housing Background Paper (HBP) which has been prepared to help inform the WMRSS Phase 2 Revision. Para 1.2 (HBP) states that urban capacity and Section 4(4) returns were used to develop the three Options for the consultation process. However since the publication of the 4(4) advice, Redditch Borough Council Officers have pointed out that the 4(4) advice that relates to Redditch Borough is an over-estimate of capacity. Because of the errors about Redditch Borough capacity in the 4(4) advice, Redditch Borough Council would question the statement in para 2.2 (HBP) which states that the estimates, as set out in Table 1, Appendix 1 (HBP), provide a reasonable representation against which policies for the release of land for new housing can be judged. Redditch Borough Council details its analysis of Redditch Borough related growth in its H7 response under (Methodology Used for Calculating Redditch Borough Related Growth) and considers this table to be inaccurate.

Redditch Borough's local requirements and growth potential not taken into account

Para 2.11 (HBP) states that "Careful consideration is also being given to the implications of maintaining the guiding principles and strategy in the existing WMRSS, particularly the need to promote urban renaissance and to prevent potentially large amounts of house building in the shire areas." It goes on to say that "account is also being taken of local requirements and growth potential of different parts of the Region, alongside the needs to provide new or improved infrastructure, which may have constraints on the level of development, which can be built." Redditch Borough Council strongly considers that the WMRSS has not taken sufficient account of Redditch Borough's local requirements and growth potential. The Regional Assembly cannot possibly comment on what it thinks Redditch Borough can accommodate without a detailed Expansion Study and analysis in place.

(iii) **The balance of proposals should reflect WMRSS objectives (e.g. with regard to urban renaissance)**

Redditch Borough Council would like to query para 2.6 (HBP), as to why household projections assume a continuing outflow of migrants from the MUAs to surrounding areas in line with past trends. Pg 14, Spatial Options document contradicts this statement as it clearly states that there is "early evidence that the rate of migration from the West Midlands conurbation to the surrounding Shire areas is slowing down." Redditch Borough Council considers the WMRSS and its supporting documentation to be in conflict with each other on this occasion. Redditch Borough Council assumes that through WMRSS policy and the principles of Urban Renaissance, the MUAs should regenerate to become "increasingly attractive places where people want to live, work and invest". Redditch Borough Council considers that basing household projections up to 2026 on an outflow of migrants from the MUAs to surrounding areas would be

contrary to WMRSS policy and undermine successful regeneration. The housing projections should assume a reduced outflow of migrants from the MUAs and in turn, reduce the number of projected households elsewhere in the Region by 2026. Options 2 and 3 are likely to reverse this principle.

Redditch Borough Council would like to point out that the strategic housing target for Redditch Borough in the Worcestershire Structure Plan (4,550 dwellings between 1996 - 2011) is based only on natural growth requirements. Consequently for the WMRSS consultation paper to be including some outflow of migrants from the conurbation in the Redditch housing projections is not a continuation of current policy but actually a shift back to the period prior to 1996 when Redditch Borough had a history of accommodating some housing growth originating in the conurbation.

(iv) **All natural growth should be met where it arises unless it can be demonstrated that this is not deliverable**

Para 4.20 (HBP) states that Kidderminster and Bromsgrove are described as 'other large settlements', which could be locations for strategic growth. Redditch Borough Council queries why neither of these districts have been allocated enough dwellings to meet their own natural growth under Option 2. It is pointed out that in the WMRSS; Redditch has the same designation as both Kidderminster and Bromsgrove, i.e. "other large settlement". Based on the ONS 2003 household projections, the following observations have been made:

Bromsgrove - +7000 households up to 2026
Wyre Forest - +7000 households up to 2026
Redditch Borough - +7000 households up to 2026

Based on Table One – pg 24, Spatial Options document – Option 2 (Natural Growth), the following observations have been made:

Bromsgrove - 4700 dwellings = 2300 dwellings less than its own natural growth in households.

Wyre Forest - 4700 dwellings = 2300 dwellings less than its own natural growth in households.

Redditch Borough - 8200 dwellings = 1200 dwellings more than its own natural growth in households.

Para 4.20 states, that for Option 2, "At Redditch Borough no allowance was made for housing demand arising from the MUAs", however Redditch Borough Council would query its Option 2 allocation. The Option 2 allocation for Redditch Borough is disproportionate to those allocations for Bromsgrove and Wyre Forest. Furthermore the Option 2 allocation for Redditch Borough is clearly more than natural growth yet the HBP at para 4.20 suggests that Option 2 for Redditch is just natural growth. This issue would need to be clarified.

Para 5.9 (HBP) states that under Option 2, some shire districts also receive significant housing allocations. Redditch Borough Council would point out that Cannock Chase, Stratford, Warwick and Wychavon, as listed in this paragraph, have not even been allocated sufficient targets to meet their own natural growth in accordance with the 2003 Household Projections, let alone been allocated a 'significant' target. Therefore, Redditch Borough Council would dispute that the above statement is correct. If these districts have not been allocated sufficient targets to meet their own natural growth, then they cannot be described as receiving significant housing allocations.

Para 6.5 (HBP) states that under Option 2 proposals, large parts of the Region are unable to meet the projected demand. Map 2 (pg 17 HBP) demonstrates that out of 31 districts, 18 (58%) fail to meet natural growth demands. Redditch Borough Council would like to see robust evidence to support assumptions about areas which cannot meet projected demand. Likewise there should be evidence to support assumptions about areas such as Redditch Borough being able to accommodate the demand arising from elsewhere.

Redditch Borough Council believes that the general distribution and balance of proposals under Option 2 is inappropriate in relation to meeting natural growth where it arises and in dealing with any additional housing need on a rationale basis.

(v) **Rationale for proposals beyond natural growth requirements should be clear**

In relation to Option 3, Redditch Borough Council suggests that if all districts were allocated sufficient targets to accommodate for their own natural growth under Option 2, with the exception of MUAs and sub-regional foci or where this is proven to be un-deliverable, then the distribution under Option 3 would be less dramatic for the districts identified in para 5.13 (HBP). For example, Birmingham is allocated 8400 additional dwellings under Option 3, which in fact, still leaves it 6000 short of its own natural projected growth as stated in the 2003 Household Projections. Warwick is allocated 2500 additional dwellings under Option 3, which leaves it 7400 dwellings short of its own natural projected growth. Bromsgrove District's additional allocation of 2500 dwellings under Option 3 only exceeds its natural growth by a mere 200 dwellings. Wyre Forest (in particular Kidderminster) has no additional allocation under Option 3 and remains 2300 dwellings below its own natural growth rate. Information from WCC (Information Sheet 6: Implications of the Spatial Options for Worcestershire) indicates that both Bromsgrove and Wyre Forest would have significant urban capacity sites remaining surplus to their Option 3 allocations, in the region of some 3600 dwellings. Under Option 3, Redditch Borough has been allocated an additional 5000 dwellings which is the same amount as its nearest sub-regional focus of Worcester and all of which will need to be allocated on Green Belt land. Redditch Borough Council considers that unallocated urban capacity sites in neighbouring districts should be used in preference to Green Belt land especially if current allocations indicate that they are not meeting their own natural growth and have the spare capacity to do so.

Further to this, para 5.14 (HBP), states that “some settlements would require significant developments on greenfield land – thus becoming additional ‘foci’ settlements.” Redditch Borough Council is concerned about development potential assumptions at Redditch Borough without robust evidence from a development potential study (detailed in its response to H7). Redditch Borough Council also queries its potential status as an additional sub-regional focus and the implications that may have on Worcester City as the nearest sub-regional focus to Redditch Borough.

The Council would like to draw attention to the map on page 16 of the HBP entitled “Option 3 - Map 1”. Out of 31 districts, 15 (48%) fail to meet natural growth demands. Redditch Borough Council believes that the rationale for the balance of proposals under Option 3 is unclear.

Redditch Borough Council fails to understand why proposals for Warwickshire and Herefordshire do not meet their full projected housing demand (para 6.4, HBP). If, like the MUAs, these areas have a shortfall for meeting natural growth, then this will only encourage migration to areas where there are surplus supplies of new housing, such as the proposal for significant over-supply at Redditch Borough. This is not providing housing where natural growth projections indicate that they should be. In addition to this, for example, providing substantially more dwellings than needed at Redditch Borough up to 2026, in turn distorts natural growth projections beyond 2026 as Redditch Borough would then have to accommodate increased natural growth as a consequence of the previous excessive allocation up to 2026.

(vi) **The overall balance of proposals should be under-pinned by robust data**

a) **Urban capacity estimates**

Redditch Borough Council is gravely concerned with para 7.2 (HBP) which states that “Further investigation is required following the consultation period and as the Preferred Option is prepared, as to whether the urban capacity estimates are a true reflection of potential availability of supply.” Redditch Borough Council considers that further investigation should be carried out before a preferred option is prepared to ensure that both over allocations and under allocations are robust. It considers that these studies should have been carried out prior to this consultation period and believes that any future investigations may be ‘tailored’ to suit the RPB’s need to allocate targets at an Option 3 level as clearly stated in para 6.2 (HBP) : “Overall it is only the level of housing development proposed in Option 3, that meets the projected regional housing demand in full.”

Redditch Borough Council has concerns as to whether these investigations can be executed and analysed within a time period sufficient enough to significantly address the implications of development and influence the direction of the Preferred Option.

b) ECOTEC Report (Identification of LHMA's)

Background to Study

Redditch Borough Council has concerns that the HBP (para 5.14) makes suggestions that Redditch Borough may become an additional 'focus' settlement. It appears to Redditch Borough Council that the RPB's assumptions about capacity at Redditch Borough have prompted ECOTEC to look further at this scenario as set out in para 1.4 of its Study. It states "Early work on the WMRSS revision has identified a range of planning issues that are likely to require a local housing market area approach, including : the need to consider the potential role of the larger settlements". For Redditch Borough in particular, Redditch Borough Council is concerned that in its case, the LHMA has been tailored in order to satisfy the requirement of significant development and thus become an additional 'focus' settlement. The consequence of this is to receive a housing allocation at a much greater level than natural growth would dictate.

Identifying LHMA's

Para 2.2 of the ECOTEC Report points out that it has become clear that analysis based on local administrative boundaries is inappropriate as markets take little or no account of such boundaries. Redditch Borough Council agrees with this statement. In para 2.6 of its report, ECOTEC adds that the overwhelming majority of moves by householders are short distance moves which do not involve a change of employment, and that its findings primarily involve the analysis of travel to work data (TTWD).

Para 2.14 states that "One of the key developments in market analysis has been the acceptance that local authority administrative boundaries often fail to coincide with areas recognised by the market". Redditch Borough Council considers that Census Ward boundaries can also fail to coincide with areas recognised by the market. Redditch Borough Council, after close consideration of the LHMA maps, particularly Redditch LHMA, has come to the conclusion that ECOTEC has produced its LHMA's based purely on Census Ward boundaries with no detailed analysis as to how these ward boundaries relate to the identified LHMA. Redditch Borough Council considers this universal approach to identifying LHMA's to be inappropriate and inaccurate. This method makes the analysis of TTWD easier and more 'convenient' rather than taking a more detailed approach of breaking Ward level data down to Local Output Area level data as this would be more meaningful.

Paras 4.21 to 4.23 give details about information gathered by ECOTEC from house builders/developers, which, it is stated, is "based largely on anecdotal 'perceptions' of markets, rather than being evidence based". Redditch Borough Council considers it wholly inappropriate to use such 'anecdotes' in analysis of a report which underpins the development of the WMRSS revision.

In March 2006, WCC identified LHMAs in Worcestershire for the purpose of informing the WMRSS review. WCC does indeed use the same TTWD principles and the same LHMA definition in Draft PPS3 as used by ECOTEC. However, to supplement its data and to ensure a detailed analysis of its results, WCC used 2001 Census data based at Local Output Area level because (as quoted in its Local Housing Market Areas in Worcestershire - Summary Report) "these are small enough to be meaningful on a local level".

Given that local estate agents are best placed to understand and provide informed judgements about the operation of the local markets across the county, WCC also visited numerous estate agents across the county to obtain their views on the housing markets in operation across Worcestershire. Within its analysis of data, WCC, in conjunction with estate agents' knowledge, was able to direct local output area data to the relevant LHMA and thus produce more accurate LHMA boundaries for Worcestershire.

Redditch Borough Council concludes that the ECOTEC study appears to be a desk-based survey based upon irrelevant ward boundary data. Redditch Borough Council suggests that ECOTEC failed to use and analyse local based knowledge from important sources such as estate agents. Furthermore, Redditch Borough Council can see no relevance or robust evidence in asking developers for 'anecdotal perceptions' of markets.

Page 19 - Spatial Options document, states that the ECOTEC study was commissioned to support the development of Spatial Options, and that RPBs should plan to distribute housing provision so that housing need and demand are met within the LHMA. Redditch Borough Council disputes the LHMA boundary for Redditch as identified in the study produced by ECOTEC and therefore believes the WMRSS distribution of housing targets to Redditch Borough to be flawed if derived from the LHMA identified in the ECOTEC study.

(vii) Comparable settlements, in policy terms, should receive similar proportions of new development

Redditch Borough allocations in comparison to like-for-like settlements

Comparable settlements (page 90, Spatial Options document) should be consistently treated. With respect to "other large settlements" in the Region, which are also Strategic Centres, Redditch Borough Council considers the apportionment of new development between these areas to be unsound.

Redditch Borough Council wishes to query how the percentage increase from Option 1 to Option 3 can be justified. For example, Wyre Forest (Kidderminster - Large Settlement and Strategic Centre) has an increase from Option 1 to Option 3 of a mere 2.1% whilst Redditch Borough has an increase of 206.9%. These two areas are like-for-like settlements in the WMRSS and should be considered equally in terms of

percentage of housing distribution above and beyond the levels required to meet natural growth.

Redditch Borough Council would like to see a consistent percentage increase across like-for-like settlements above and beyond the levels needed to accommodate natural growth and would also query why areas (Large Settlements and Strategic Centres) such as Cannock Chase, Stafford, Stratford-upon-Avon and Wyre Forest (Kidderminster) were unable to take any additional growth between Options 2 and 3.

In relation therefore to question H6, Redditch Borough Council considers the rationale for the overall balance of proposals under each of the Options to be unclear. It considers that districts that volunteered for more housing should have proportionately higher targets and that all housing targets should reflect the ability of a district to accommodate its target. In all situations the balance of proposals should be compatible with WMRSS objectives and comparable settlements in policy terms should receive comparable housing proposals. All natural growth should be accommodated where it arises unless there is sound information to suggest a deviation from this approach. It is crucial, for all districts, that the overall balance of housing proposals for each of the Options is under-pinned by robust data.

H7: You may wish to consider specific parts of the Region, please set out below any comments you wish to make on any part of the Region. Please specify the area in which you are commenting.

At this point in its submission, Redditch Borough Council would like to raise specific concerns regarding the housing and employment development proposals and subsequent consequences for Redditch Borough. In particular, the points raised by the Council relate to the following:

(i) Location and Context

(ii) Potential capacity in Redditch Borough and its ability to meet Options 1, 2 and 3

- Accommodating the Growth Options
 - a) Redditch Borough Housing Land Supply 2001 - 2011
 - b) Borough of Redditch Local Plan No.3 Reserve Sites
 - c) Potential Urban Capacity
 - d) Areas of Development Restraint (ADR).

(iii) Methodology Used for Calculating Redditch Borough Related Growth

- Projected population up to 2026
- Projected households up to 2026
- Option 3 - The housing directed to Redditch Borough should go elsewhere.

(iv) Analysis of available land for meeting Growth Options 2 and 3 for Redditch Borough

- Peripheral expansion into the Green Belt to the North and North West of Brockhill
- Peripheral expansion beyond the Webheath ADR and into the Green Belt in the South West of Redditch Borough
- Expansion North East of Redditch Borough (Ravensbank)
- Land between Studley and Redditch
- Other areas for consideration as Growth Options

- o Non site specific development issues
 - a) Land drainage
 - b) Sewerage.
- (v) **Need for a cross-boundary Development Potential Study**
- (vi) **Possible detrimental impacts on Redditch Borough due to growth preferences in the MUAs and sub-regional foci**

(i) **Location and Context**

The Borough of Redditch sits in the north east of Worcestershire and is approximately 3 miles (4.8 km) south of the M42 between Junctions 2 and 3. Despite being one of the smallest districts within the County, covering an area of approximately 21 square miles (54 km²), it has one of the largest population densities. Redditch Borough is divided into two clearly defined areas. The urban area in the north and east of the Borough accounts for 50% of the total Borough area and contains around 93% of the population. The rural area to the south and west is predominantly Green Belt and accounts for 50% of the total Borough area, including the villages of Astwood Bank and Feckenham and contains the remaining 7% of the population.

Within its urban area, Redditch Borough is almost completely developed up to its administrative boundaries. It abuts Bromsgrove District in the north and west and Stratford-on-Avon District (Warwickshire) in the east. (Please see plan attached as an Appendix to H7).

(ii) **Potential capacity in Redditch Borough and its ability to meet Options 1, 2 and 3**

Accommodating the Growth Options

Option 1 of WMRSS Review Table One, allocates 4,300 dwellings to Redditch Borough between 2001 to 2026 under a rolling forward of current WMRSS housing targets. This target could be achieved with regard to the following:

- a) Housing Land Supply 2001 - 2011
- b) Local Plan No. 3 Reserve Sites
- c) Potential Urban Capacity
- d) Areas of Development Restraint

a) Redditch Borough Housing Land Supply 2001 - 2011

The housing land supply in Redditch Borough at 1 April 2006 is made up as follows:

Completions 2001 - 2006	-	1486
Commitments 1/4/06 to 31/3/11	-	<u>1063</u>
		2549
Shortfall required to meet WMRSS target	97	(met by Aug 2006)
Total supply 2001 – 2011	-	<u>2646 dwellings</u>

b) Borough of Redditch Local Plan No. 3 Reserve Sites

Local Plan No. 3 is a transitional local plan that was adopted on 31 May 2006. The binding Inspector's report was received in March 2006. The Inspector decided that the strategic housing target should be based on a calculation derived from the WMRSS allocation for Worcestershire. This is a maximum figure and by the time of receipt of the Inspector's report, had almost been achieved and since August 2006 the Council has been in a housing moratorium situation.

The Borough of Redditch Local Plan No. 3 identifies land for additional housing use should current allocations fail to come forward for development. This figure could provide additional commitments.

Additional land with potential	-	<u>211 dwellings</u>
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c) Potential Urban Capacity

In WCC's Section 4(4) submission to the RPB, over-assumptions are made regarding the capacity available from the Redditch Urban Capacity Study (UCS) produced in 2003. Many of the UCS potential sites are now either unfeasible, allocated in the adopted Borough of Redditch Local Plan No. 3 (31 May 2006), or have already been developed. An up to date Development Capacity Study needs to be undertaken to substantiate potential capacity in the urban area of Redditch Borough, but a figure of between 108 and 246 dwellings is assumed at this stage. This figure of 246 is the sum of the sites identified in the 2003 urban capacity study that could be re-visited and considered for inclusion in a site specific DPD. It is pointed out that the remaining UCS sites were rejected when preparing housing allocations in the current Local Plan and some sites could well be rejected again. However other large site windfalls in the urban area may come forward to compensate for this when the moratorium is lifted. It is also pointed out that one of the sites in the urban capacity study could be used for residential development or B1 employment use. There is limited scope for new employment land within the Borough and the site in question has an area of

5.91ha and if used for housing would accommodate 138 dwellings based on 30 dwellings per hectare. This is why the assumed urban capacity for residential development is presented as a range i.e. 108 - 246 dwellings.

Potential UCS sites available - **108 - 246 dwellings**

d) Areas of Development Restraint (ADR)

Redditch Borough has three ADRs identified in the Borough of Redditch Local Plan No. 3. WCC assumed a combined capacity for the ADRs of 1530 minimum. Redditch Borough Council suggests that 1200 maximum is a more realistic figure.

The potential of the ADR land to accommodate development is detailed below:

Potential ADR capacity - **1050 - 1200 dwellings**

Name of ADR	Assumed Housing Potential	Assumed Employment Potential	Comments
Webheath	600 dwellings	None because of poor highway infrastructure	Potential residential capacity is based on the 2002 traffic study which will need to be updated. Capacity could be less
Brockhill West of Railway line	450 dwellings	None because of topography/visual impact/urban design issues	
Brockhill East of Railway line	150 dwellings	3.1 ha employment land	Site could accommodate housing or employment development or a mixture. The total area is 8ha
A435 corridor	It is considered too premature to make assumptions about the possible development potential within the A435 corridor at this stage. This was the consensus of a meeting held between the following organisations at Redditch Borough Council on 5 February 2007:		

	Redditch Borough Council – Planning Policy Redditch Borough Council – Estates Worcestershire County Council – Highways Authority Worcestershire County Council – Estates Worcestershire County Council – Property Warwickshire County Council – Highways Authority Stratford-upon-Avon DC GOWM Highways Agency and their consultants English Partnership and their consultants
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Total potential additional housing capacity available (a+b+c+d) = **4015 - 4303 dwellings**

The lower figure of 4015 dwellings assumes employment development on some ADR land and UCS land.

Option 1 = 4,300 dwellings, therefore Redditch Borough would be able to meet this target or a shortfall of 285 if a site in the urban area and land east of the railway line at Brockhill and the A435 ADR were used for employment development.

Option 2 = 8,200 dwellings, therefore Redditch Borough would have a shortfall of 3897 dwellings to meet this target or a shortfall of 4185 if a site in the urban area and land east of the railway line at Brockhill and the A435 ADR were used for employment development.

Option 3 = 13,200 dwellings, therefore Redditch Borough would have a shortfall of 8897 dwellings to meet this target or a shortfall of 9185 if a site in the urban area and land east of the railway line at Brockhill and the A435 ADR were used for employment development.

(iii) Methodology Used for Calculating Redditch Borough Related Growth

Calculating Redditch Borough related growth up to 2026 involves three distinct stages:

- Calculating population growth
- Calculating household growth
- Calculating the number of dwellings required

A robust calculation of the number of dwellings required relies on robust assumptions about population growth and household growth.

The Option 2 figure for Redditch Borough in Table One of the WMRSS Review, appears to be based on the projected natural growth of the area taken from the WCC Section 4(4) response. Redditch Borough Council questions the figures that WCC provided to the RPB in its Section 4(4) response. WCC has stated that the natural

population increase will trigger the need for 8,200 dwellings between 2001-2026 for Redditch Borough. Email correspondence from Officers at WCC to Redditch Borough Council states 'Using a Natural Change projection, Redditch Borough is projected to gain 7,100 in population, but this still equates to 7,900 households, leading to the 8,200 dwellings stated.'

Redditch Borough Council fails to understand how an increase in population of 7,100 can in turn equate to a need for 8,200 dwellings. The issue of population increase and number of households up to 2026 is considered below.

Projected population up to 2026 – Based on ONS statistics

Redditch Borough Council queries the WCC's projected population figure of 7,100 new residents between 2001 and 2026. Based on the Office of National Statistics (ONS) Vital Statistics (VS) returns for 2001 - 2005, the average annual population increase for Redditch Borough is 363 for this four year period. ONS also produce migration statistics which according to Para 2.58 of the WCC Section 4(4) response, WCC made no allowance for migration in its projection calculations. This is a fundamental flaw in calculating growth for Redditch Borough as out-migration exceeds in-migration substantially. The average annual migration figure for Redditch Borough over the past three years is -170 (out-migration).

Suggested methodology for calculating population projections – Based on ONS statistics

A realistic figure to calculate Redditch Borough related growth from 2001 to 2026 = 363 - 170 = 193 persons per year.

Hence, 193 x 25 years = 4,825 population growth not 7,100 as suggested in the Option 2 analysis of the WCC Section 4(4) response.

Projected households up to 2026 – Based on ONS statistics and 2001 Census

Redditch Borough Council has not been able to ascertain how a projected dwellings figure of 8,200 stems from an increase in population of 7,100, as methodology has not been made available by WCC for Redditch Borough Council to scrutinise.

In the absence of WCC methodology, Redditch Borough Council would suggest a logical approach to methodology when calculating its household requirement up to 2026 to be as follows:

Suggested methodology for calculating household projections

Population of Redditch Borough (Census 2001)	78806
Suggested population increase to 2026 - 193pa x 25yrs	<u>4825</u> +
Projected population of Redditch Borough at 2026	= 83631

Projected number of households in Redditch Borough by 2026
83631 ÷ 2.14 (projected household size by 2026) = 39080 households

Therefore:

39080 (households) minus

31652 (households in Redditch Borough - Census 2001) =

7428 additional households in Redditch Borough between 2001 -2026

This figure is in fact, similar to the Redditch Borough figure for household change (7244) in the HBP (Appendix 1, Table1), but less than the Option 2 (natural growth) figure of 8200 for Redditch Borough in Table One of the Spatial Options document.

However, as WCC calculations appear to have equated a population increase of 7100 into a household requirement of 7900 up to 2026, Redditch Borough Council assumes that its suggested methodology above has made more generous assumptions in arriving at a figure of 7428 households from a projected population increase of 4825. If it is assumed that the WCC methodology is correct (unsighted at this time), then Redditch Borough Council would expect a household projection based on a population increase of 4825 to equate similarly to an increase of 7100 people to 7900 households as calculated by WCC. Therefore:

Suggested methodology for calculating projected households based on population increase ratios applied by WCC

At a very basic level, Redditch Borough Council has applied a percentage increase to establish a similar increase from population to households:

7100 to 7900 = 11.26% increase (WCC)

4825 + 11.26% = 5368 projected household provision up to 2026 (RBC)

Without sight of WCC methodology which equates projected household growth (7900) to projected dwelling requirement (8200), Redditch Borough Council is unable to suggest what the projected dwelling requirement based upon its projected provision of 5368 households would be.

Therefore, Redditch Borough Council would query its natural growth assumption and the housing allocations placed upon it in Option 2.

Option 3 - The extra housing directed to Redditch Borough should go elsewhere

Redditch Borough Council also wishes to reiterate its comments under H6 of this submission, that it considers that if all districts were allocated sufficient targets to accommodate their own natural under Option 2, with the exception of MUAs and sub-regional foci, unless this is proven to not be feasible, then the distribution under Option 3 would be less dramatic. Information from WCC indicates that both Bromsgrove and Wyre Forest would have significant urban capacity sites remaining surplus to their

Option 3 allocations, in the region of some 3600 dwellings. Redditch Borough Council considers that neighbouring districts such as these should be allocated targets to reflect the take-up of sites identified in urban capacity studies in preference to a district such as Redditch Borough having to make substantial allocations on Green Belt land under Option 3.

(iv) **Analysis of available land for meeting Growth Options 2 and 3 for Redditch Borough**

There is limited information currently held by Redditch Borough Council regarding growth options for Redditch Borough. The following outlines the information currently available in relation to the directions for expansion for larger growth options:

Peripheral expansion into the Green Belt to the North and North West of Brockhill

There is no recent study about the feasibility of development on the parcels of Brockhill Green Belt. Prior to the identification of land for the development of the Brockhill estate (1300 dwellings, constructed between 1996 - 2006), a study was carried out. The technical analysis of development options for Brockhill highlighted a number of implications for development, but also some benefits. However, it is not clear if the study would still be applicable, given that most of the study area has already been developed.

Previous concerns included:

- a) access and transportation issues;
- b) land drainage and foul sewerage issues (recent developments have affected land drainage and issues are still unresolved);
- c) the location of the badger populations and other ecological factors at Brockhill Wood (immediately to the north of the existing development and now designated as Green Belt and a Landscape Protection Area); and
- d) community facilities implications.

It is assumed that the potential badger issue can be addressed and community facilities provided as part of any new development, the Council would make the following observations in relation to access and transport issues and land drainage and foul sewerage issues.

a) **Access and transport issues**

The key transport issues are capacity at Bordesley (A441) and capacity at Windsor Road / Birmingham Road area.

The principle of a Bordesley By-Pass has already been established and planning permission granted. The Transportation Assessment for the North West Redditch Master Plan Area suggested that certain elements of development in this area would require contributions to the cost of the scheme, which at the last estimate (Spring 2006) was to be in the region of £10 Million. The Transport Study by White Young Green, underpinning the draft North West Redditch Master Plan, indicated that the Birmingham Road through Bordesley (A441) suffers from transport problems. This section of road is a single carriageway and constitutes the main route from the Borough to the M42 Motorway. This is confirmed by the Inspector's report from the Abbey Stadium development Inquiry (1 February 2006). Paragraph 10.2 of the Inspector's Report concludes that the A441 through Bordesley is already operating at full capacity, with an annual average daily traffic flow of 22,500 above the link capacity of 21,000 for a new, wide single carriageway. Expansion into the Green Belt to the north-west has the potential to increase the traffic flow on the A441.

Unless there is a link road from the existing Brockhill area through the ADR to the A441 at Bordesley, any traffic, which wanted to travel to Birmingham on the A441 from a new development in the vicinity of Brockhill, would need to use Windsor Road (single carriage-way with a 'pinch-point' beneath a railway bridge and traffic lights controlling flow approximately 100m from the roundabout junction with the A441).

A link from Brockhill to the A441 at Weights Lane has been discussed in the past, but was deemed prohibitive due to the need to cross the railway. This option could be explored further. The provision of this link would be through development of the ADR, but without the link, congestion at Windsor Road would be an issue.

b) Land drainage and foul sewerage issues

Land drainage and sewerage constraints which relate predominantly to development in this area but which also affect Redditch Borough as a whole, are detailed later in this particular response under the headings of Land Drainage and Sewerage.

Peripheral expansion beyond the Webheath ADR and into the Green Belt in the South West of Redditch Borough

The following text details the growth constraints with respect to the Green Belt land in the South West of Redditch Borough. However, initially, Redditch Borough Council would draw the attention of the RPB to WMRSS Policy QE.6. The conservation, enhancement and restoration of the Region's landscape (pg 75 RPG11) Para 8.27 accompanying this policy states that "areas for biodiversity enhancement identified on the Quality of the Environment Areas of Enhancement diagram offer some of the best prospects for retaining environments with a rich and resilient biodiversity resource". The aforementioned diagram (pg 98 RPG11) clearly indicates the area to the south

west of Redditch's urban area, as an Area for Concentrated Bio-Diversity Enhancement. Bearing this point in mind, and taking account of the following analysis, this area, as a direction for future growth should be considered to be at odds with Policy QE.6 of the WMRSS.

The existing Redditch urban area is tight up against its administrative boundary in all directions except for the Green Belt area to the south west of the town. This Green Belt area is lacking in infrastructure e.g. highway and sewerage infrastructure and also part of the area is of particular landscape character.

Of concern is the assumption made about possible development to the south west of Redditch Borough in designated Green Belt land. Without detailed feasibility studies, Redditch Borough Council is unable to determine the viability, or otherwise, of potential development in this area. However, it is necessary to point out that previous studies have highlighted significant constraints to development.

- a) The "South West Study" was undertaken by Redditch Borough Council in 1991 in order to progress the Borough of Redditch Local Plan No. 2.
- b) The "Redditch Joint Study" was undertaken by Worcestershire County Council and Warwickshire County Council between 1986 and 1988. It assessed the possible locations for peripheral growth against a number of growth options for Redditch Borough.
- c) The "Joint Study of Feasibility - Expansion of Redditch New Town" was undertaken by Worcestershire County Council, Warwickshire County Council and Redditch Development Corporation in 1973. This study examined the possibility of expanding Redditch Borough to cater for 150,000 population by 2001.

From all the studies, issues associated with allocating development to the south west area, as a whole or in parts, are as follows:

- 1) The area between Redditch and Astwood Bank was considered to be particularly sensitive to development. It was considered that any allocation of this area for development would bring about the coalescence of the two settlements and was therefore considered undesirable.
- 2) The open nature of the south west meant that development would have significantly extended into the rural south west towards Feckenham. There are very few physical constraints or limitations to development and it would be difficult to protect these boundaries in the long term.
- 3) The existing road system was noted as a serious constraint to development. The 1973 study envisaged that a major new road link between the A448 (Bromsgrove Highway) and a new road parallel with and to the east of the A441

would be required. The 1988 Interim Joint Study stated "providing access to this area will be difficult and very expensive to overcome."

- 4) The South West Study concluded that the lack of highway infrastructure in the study area, and difficulties of connecting it to roads of appropriate status, were a significant constraint to development. The existing highway network is typified by narrow country lanes, the standard being such that no new development could rely upon them. The south west periphery of the urban area is relatively distant from the Primary Distributor Network/District Distributor Network. Any development in any part of the study area would need to be complemented by a completely new highway distribution network.
- 5) The existing roads which extend to the edge of the urban area to the west (Church Road, Foxlydiate Lane, Heathfield Road, and Blackstitch Lane) have frontage development along them with associated environmental parking problems. Access to the south west study area by these means would be highly undesirable.
- 6) Substantial development in the study area would not be possible if it were to be solely serviced from Windmill Drive (B4504).
- 7) A combination of factors, such as topography, existing development, inadequate existing roads, important landscape areas and special sites of importance, mean that a new link to Windmill Drive would not be acceptable in any location anywhere from the area south or east of Love Lyne, Tippings Hill, Feckenham Road, Weavers Hill or Dagtail Lane.
- 8) Topography, existing development, the limitations of the existing A441¹, areas of ecological importance and the extreme difficulty of improving the nature of Crabbs Cross roundabout mean that connection to the A441 from the study area could only be achieved by incurring a wide range of costs which would significantly reduce the desirability of attempting to introduce highway infrastructure into the study area from this direction.
- 9) Substantial development to the South West of Redditch Borough should connect at one point to the primary road system. There is no possible direct route to the primary distributor system from the study area. Windmill Drive provides only indirect access to the primary system, and as outlined, there are only a limited number of opportunities available to reach Windmill Drive from the study area and there are problems associated with the use of Windmill Drive.

¹ Construction of the Studley By-pass would have reduced traffic flow on the A441 through Astwood Bank. However, expected national traffic growth would have meant that by 2001 the traffic on sections of the A441 would have returned to levels commensurate with, or above, existing flows and would exceed the roads desirable capacity. It is assumed that because the Studley By-pass has not been constructed, the A441 is now operating above capacity.

- 10) Only two further alternatives remained in order to access the site:
- a) Connection to the A448 Bromsgrove Highway at Foxlydiate Interchange to service the northern part of the study area. This would pass into Bromsgrove District and within an area of Green Belt. It would have been disadvantageous in terms of its effects on existing developments, the landscape and an area of ecological importance. The distance from the interchange to the nearest point of the study area is approximately 1.2 miles (1.93 km).
 - b) Connection to the A435 Junction with the Alcester Highway Extension. (This extension is no longer planned as it is related to the A435 dualling proposals that are the subject of a revocation order).
- 11) Whilst Windmill Drive would have offered a connection to the Bromsgrove Highway and the primary distributor network to the north, a connection to Windmill Drive from the study area would have also redistributed some traffic onto the Crabbs Cross roundabout. This is already a problem junction in terms of capacity issues. It is also difficult to identify acceptable link/s from the study area to Windmill Drive and only two alternatives are suggested.
- a) Callow Hill Lane - this would have involved the improvement of Callow Hill Lane. Any substantial improvement and re-alignment of Callow Hill Lane would have significant negative effects in terms of its implications for existing properties and its possible environmental and landscape costs. It is likely that the extent of the land required for this improved road would necessitate the demolition of a small number of properties along Callow Hill Lane.
 - b) Link via Morton Stanley Park/Golf course east of Green Lane – This would have involved the loss of land currently used for recreational purposes and would have introduced disturbance into the area. Downsell Wood, which is located within the private golf course, was identified as being a 'Special Wildlife Site' and it was therefore concluded that it should be protected from adverse development.
- 12) Previous studies highlighted drainage to be a significant problem. Study areas were also noted as expensive in terms of providing services and infrastructure.
- 13) The South West study area was considered to be particularly remote from the Town Centre. There is also considerable distance to the District Centres.
- 14) Topography was considered to be a major constraining factor with regard to securing adequate access to the area from the existing highway network as well as the expense to overcome the topographical constraints.
- 15) Some areas of the south west were noted as having ecological value.

- 16) Parts of the study area were graded as having a relatively high quality of agricultural land. M.A.F.F concluded that development would be preferred in other areas rather than the south west.
- 17) The study area is poorly served by public transport. The existing public transport system would require considerable extension.
- 18) The southern slopes of the Callow Hill Ridge were concluded as being steep and unsuitable for general development. Avoiding these slopes meant that development would have been pushed out and away from the urban area onto the lower land to the south, where there was little in the way of physical constraint to development in topographical terms. (Since the previous studies, the Borough Council adopted the Callow Hill Ridge Landscape Character Assessment in 2005).

The 1973 Landscape Assessment was considered to be still largely valid in 1991 when preparing the Borough of Redditch Local Plan No.2 because hardly any development had taken place within the study area since the 1973 study had been undertaken. Because of the Green Belt restrictions in place, it is still the case that very little development has occurred here; therefore many of the observations made in previous studies, as outlined above, would still apply to the current WMRSS proposals.

Expansion North East of Redditch Borough (Ravensbank ADR)

The Ravensbank ADR is located within Bromsgrove District and allocated for Redditch Borough related needs in the Bromsgrove Local Plan 1986 - 2001 (adopted January 2004). The Ravensbank ADR would be suitable for employment development because of its proximity to the Ravensbank Business Park. The ADR is not identified for Redditch Borough development in any strategic planning document, e.g. Worcestershire County Structure Plan or WMRSS. It is considered that in relation to development for employment purposes, the Ravensbank ADR is likely to be a suitable direction for future growth, but a study has not been undertaken. In terms of accessibility and transportation issues, the Ravensbank ADR has good links to the A435 and in turn to the M42. The site is bounded on one side by the A435. A link road could be taken into the site directly from the A435, which could ultimately be connected onto Ravensbank Drive to form a through route. Infrastructure would not need to be provided prior to development and could be constructed by developers in a structured form throughout the development of the site.

Land between Studley and Redditch

This land was the subject of previous joint studies. In terms of highway infrastructure this land may be more readily accessible than the South West of Redditch urban area.

Other areas for consideration as Growth Options

There are other areas beyond the Redditch Borough administrative boundary which so far have not been the subject of Redditch Borough related expansion studies and Redditch Borough Council considers that they should also be investigated in order to provide a complete and thorough analysis of potential growth options in all directions beyond its administrative boundary. These areas are:

- Beoley;
- Mappleborough Green;
- Foxlydiate (in vicinity of A448).

Non site specific development issues

a) Land Drainage

There are already significant effects to the local water courses arising from existing development. Some of this has occurred due to the length of time for some developments to be completed, such that the design criteria adopted now falls well behind accepted criteria. In addition, climate change was not fully assessed, and as a consequence there is a potential shortfall in flood protection. Any significant new developments in Redditch Borough would need to take these possible deficiencies into account in accordance with the requirements of PPS 25 (Regional Flood Risk Assessment).

A study of the WMRSS targets and land drainage issues in and around Redditch Borough has not been undertaken.

b) Sewerage

Considering the proposed Option levels, the basic dry weather flow (DWF) impact upon the current sewerage infrastructure in Redditch Borough is:

- | | | |
|------------|------------------|------------------------------------|
| • Option 1 | 4,300 dwellings | DWF Increase -- 33.2 litres/second |
| • Option 2 | 8,200 dwellings | DWF Increase -- 63.3 litres/second |
| • Option 1 | 13,200 dwellings | DWF Increase - 101.9 litres/second |

These pose significant levels of increase in base flows which, if unchecked, would increase both the magnitude and frequency of foul flooding and consequent pollution of adjacent water courses. Redditch Borough Council finds this unacceptable.

Redditch Borough is linked to two sewage treatment facilities at Priest Bridge (in the very south west of the Borough) and Sernal (located in Warwickshire, beyond Studley). The former is subject to very stringent levels of flow and

quality controls by the Environment Agency (EA) and therefore any increase in the flow is unacceptable. Indeed, most recent developments within the natural catchment of Priest Bridge, have resulted in flows being pumped into the Sernal catchment.

Recent large scale residential development in the north west of Redditch Borough (Brockhill) (in the natural catchment for Sernal) has directly contributed to flooding problems at Windsor Road FWS (located in the north west of Redditch Borough). It is an old, vulnerable sewer of limited capacity. It has a long history of problems and recent planning/sewerage policies appear to have put additional pressure onto this sewer with severe consequences undermining the benefit of earlier improvement strategies.

There has also been concurrent flooding from the Forge Mill Duplication Sewer to the rear of Dolphin Road, Abbeydale. This would suggest that there is no additional capacity within Windsor Road FWS, and both the original outfall sewer and the new duplication sewer. In addition, the effects of recently committed development have not been 'added' to the 'existing' flows.

The proposed increases in flow resulting from recently committed development would cause surcharging and possibly flooding. As the Local Drainage Authority, these consequences are deemed unacceptable by Redditch Borough Council as there would be heavy, direct pollution of the Batchley Brook and River Arrow.

Redditch Borough Council considers that major consideration needs to be given to the sewerage infrastructure in the Redditch Borough area, prior to development allocations of any magnitude, as this will not only have a detrimental effect upon existing systems, but will also hinder the completion expectations of any new development. The RPB has not considered these matters.

(v) **Need for a cross-boundary Development Potential Study**

It is Redditch Borough Council's opinion, based on the information detailed above, that Options 2 and 3 for housing distribution will result in Redditch Borough Council having issues associated with allocating new sites to meet the demands of the housing options.

Beyond the potential capacity within Redditch Borough (4015 to 4303 dwellings) discussed above, the proposed levels of development being considered for the period up to 2026 under Options 2 and 3 will result in the use of Green Belt. The options for growth beyond the administrative area of Redditch Borough are unknown but could include Ravensbank ADR in Bromsgrove District and other land in Bromsgrove District and the District of Stratford-upon-Avon (Warwickshire). Table One of the WMRSS Review does indicate that for Options 2 and 3, development may include peripheral expansion of settlements into adjoining local authority areas. No up-to-date technical

advice exists, to either support or dismiss claims about such large numbers of new dwellings being accommodated in Redditch Borough Green Belt or adjoining its administrative area in land that is generally also designated as Green Belt.

Redditch Borough Council is having difficulty forming opinions about how 3900 dwellings (Option 2 minus capacity at Option 1) or 8900 dwellings (Option 3 minus capacity at Option 1) can be accommodated on Redditch Borough Green Belt and/or beyond the Borough's administrative boundary because up to date technical advice does not exist about the ability of the area to accommodate (or not accommodate) this number of dwellings and related infrastructure. In terms of creating balanced communities Redditch Borough Council would point out that on top of the aforementioned housing options there are WMRSS employment targets that will also need to be accommodated.

The latest information available in relation to the Green Belt in the South West as detailed above, is the finding of the Inspector at a Borough of Redditch Local Plan No. 2 (BORLP2) Inquiry, but this inquiry only considered part of the South West area. The Inspector's conclusion as detailed in para 2.124 of WCC Section 4(4) Advice is that peripheral expansion into the northern part of the South West area would not be appropriate. It is Redditch Borough Council's view that the southern part of the South West is even less suitable for development because when BORLP2 was being prepared, the northern part of the South West was chosen in preference to the southern part as a development option. The parcels of Green Belt to the north west of the Borough are small in size (only 50 Ha gross) and also do not benefit from up to date technical information.

Redditch Borough would benefit from a Joint Study which explores the potential of viable locations beyond the Borough's boundaries in both Worcestershire and Warwickshire where development could take place. Secondly, up-to-date analysis of the development potential of the Borough's Green Belt needs to be carried out. In particular, Redditch Borough Council has concerns regarding the economic viability of development in the Green Belt to the South West and also infrastructure provision (particularly highways and sewerage) and negative environmental impacts. In order to possibly rule out or confirm the South West as a development option, an up-to-date survey needs to be put in place and the RPB should broker such a study.

In Redditch Borough Council's view, a survey needs to be done for Redditch related growth that is similar to that undertaken by White Young Green to deal with Worcester City growth. Without such a study, the WMRSS review process will not have the information it needs to determine whether the target for Redditch Borough meets WMRSS objectives and whether or not the growth options are deliverable. The Study could include the consideration of a new settlement as an alternative to accommodating approximately 4000 or 9000 dwellings in the Green Belt around Redditch within the administrative areas of Redditch Borough, Bromsgrove District and the District of Stratford-upon-Avon. The RPB should consider commissioning and brokering a study of this importance.

(vi) **Possible detrimental impacts on Redditch Borough due to growth preferences in the MUAs and sub-regional foci**

The proposed longer term strategic housing development for Worcester and Hereford may have a significant impact on existing local services within Redditch Borough.

According to the information on the Department of Communities and Local Government website if all of the proposed growth is realised New Growth Points would contribute around 100,000 additional dwellings by 2016, an increase of around 32% on previous plans for housing supply in these areas.

They will share in £40m in 2007/08 for a first round of infrastructure projects and to support growth-related studies, masterplanning and capacity-building in the New Growth Points. This money will help overcome local infrastructure problems, unlock sites for new housing and enhance the local environment.

The implications of this growth within Worcestershire has the potential to create greater inequalities with regards to service provision and access to good public transport systems in north of the county. Any significant population growth within the south of the county may tip the balance in centralising service provision in Worcester, especially when the neighbouring city of Hereford will experience increased housing growth too.

Redditch Borough along with Bromsgrove was originally considered as part of the Birmingham city-region. This is outlined in the publication, City Leadership – giving city-regions the power to grow, by Adam Marshall and Dermot Finch. This proposal has now changed. Redditch Borough and Bromsgrove no longer feature in the Birmingham city-region. As a consequence both areas along with Wyre Forest appear to be disadvantaged since the north of the county will not benefit from Worcester being a New Growth Point nor will it benefit from the city-region developments.

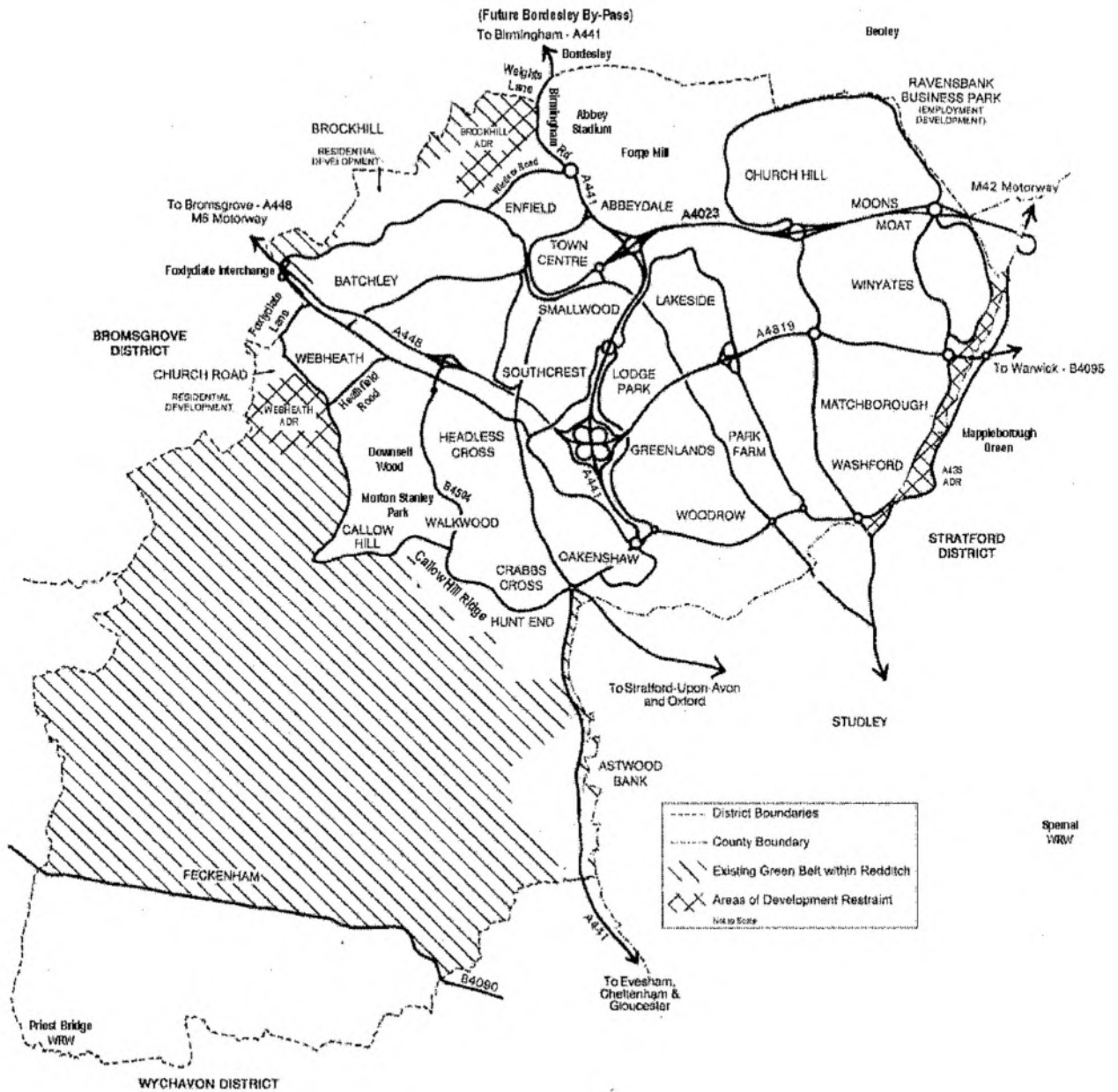
The substantial redevelopment of the Longbridge former Rover site does offer potential opportunities but it remains uncertain how this will benefit Redditch or Wyre Forest.

Concluding Comments

In relation therefore to question H7 and Redditch Borough, the Option 1 housing target cannot fully be accommodated within the existing urban area and ADR if the sites that could be identified at these locations for employment purposes (total of approximately 13.6ha) are removed from the analysis. If the existing urban area and ADR are not used for the employment reservoir then Option 1 could probably be accommodated without the need to use Green Belt land. However Options 2 and 3 raise issues regarding large scale rolling back of the Green Belt within the Borough and these Options will also require cross-boundary work to accommodate both housing and employment growth.

The Borough Council recognises the importance of meeting the demand for new dwellings and employment land where it arises. However in this context it is vital that calculations about natural growth/demand for dwellings are sound and that the land available can actually accommodate development stemming from calculations of natural growth requirements. In the context of Redditch Borough the Council is not confident about calculations for natural growth and considers that a technical study of growth options around Redditch needs to be undertaken by the RPB to establish if meeting natural growth (whatever the calculation) can actually be accommodated.

Question H7
Appendix 1



H8: In particular, do you think that Burton upon Trent should be a foci settlement, accommodating significant development on greenfield land?

Redditch Borough Council has no view in policy terms about whether or not Burton upon Trent should be a focus settlement. However in relation to the issue of Burton upon Trent accommodating significant development on greenfield land, Redditch Borough Council would point out that with respect to Redditch Borough, 52.3% of Option 1, 75% of Option 2 and 84.5% of Option 3 would be greenfield development.

Redditch Borough Council assumes that substantial growth within the Region would always include a significant amount of greenfield development. Page 10, para 1 of the WMRSS Review, states that East Staffordshire (Burton upon Trent) volunteered as a New Growth Point. Redditch Borough Council assumes that East Staffordshire, as planning authority for the area, has proven a need, desire and ability to accommodate development on this scale. It could be argued that greenfield development at a sub-regional focus of Burton upon Trent is preferable to large scale Green Belt development around Redditch which in WMRSS policy terms is not a focus for development but an "other large settlement". As Redditch Borough is unlikely to be able to meet WMRSS allocations under Options 2 and 3, then Redditch Borough Council considers that the identification of a further sub-regional focus could take development from the conurbation which is unable to be accommodated in places such as Redditch Borough.

H9: Do you think that the currently identified sub-regional foci of Worcester, Telford, Shrewsbury, Hereford and Rugby should fulfil this role, accommodating significant development on greenfield land?

The conurbation should be the focus of development. However as the sub-regional foci settlements are considered to be the next 'tier' down in the WMRSS, then Redditch Borough Council considers that these areas should fulfil the proposed role, especially given the fact that they volunteered as New Growth Points.

Redditch Borough Council considers that any housing development on such a substantial scale as proposed in Options 2 and 3 of the WMRSS Review, will require a significant amount of greenfield development wherever the allocations are directed. It is preferable to use greenfield sites adjacent to sub-regional foci rather than greenfield and, indeed, Green Belt at other large settlements such as Redditch Borough.

Redditch Borough Council is of the opinion that if the sub-regional foci consider that they can accommodate a greater proportion of the Region's allocation, then they should continue to fulfil this role.

Redditch Borough Council would like to point out that the percentage of new development being directed to Worcester (Option 1 to Option 2 – 63.8%, Option 1 to Option 3 – 133.3%), as a sub-regional focus in particular, is a lower percentage than that being allocated to Redditch Borough (Option 1 to Option 2 – 90.6%, Option 1 to Option 3 – 206.9%). Redditch Borough Council would like to see this allocation altered to reflect the significance of the sub-regional foci as major development centres.

Affordable Housing & Housing Mix

H10: Do you think that the proposed approach where the WMRSS provides a Regional target and where Local Planning Authorities provide local targets through the Local Development Frameworks process is appropriate?

Redditch Borough Council considers the proposed approach being taken by the WMRSS to be appropriate, as PPS3, para 28, states that "Regional Spatial Strategies should set out the regional approach to addressing affordable housing needs, including the affordable housing target for the region and each housing market area." Any approach other than that being taken by the WMRSS would be contrary to PPS3 guidance.

However, Redditch Borough Council does have some concerns with respect to district level targets and how they will be managed. PPS3, as stated above, expects RSSs to set regional and LHMA targets. PPS3, para 29 states that "In Local Development Documents, Local Planning Authorities should set an overall (i.e. plan-wide) target for the amount of affordable housing to be provided." Redditch Borough Council considers that local authorities hold the most robust information on affordable housing needs through housing needs assessments and sub-regional housing market assessments. It considers that as LHMA areas are cross-boundary areas, there will be a need for ownership of these areas to be taken. Redditch Borough Council is concerned that the level of affordable housing need required within LHMA areas may vary considerably for each of the local authorities that fall within the LHMA and questions how the targets will be managed, especially if LDD targets relate to administrative areas only.

As stated in its response to question H6, Redditch Borough Council considers the LHMA areas identified in the ECOTEC report to be flawed and would wish to see further study of LHMA areas undertaken before they are allocated affordable housing targets. Redditch Borough Council considers that the current LHMA for Redditch Borough would greatly distort the level of affordable housing need required. The Spatial Options document recognises that the need for social housing varies widely across the Region, depending on the characteristics of the existing housing stock, on current house prices and the mix of new development and on local incomes. Redditch Borough Council considers that the areas included in its LHMA would contain too wide a variation in the characteristics of housing stock, current house prices and incomes and therefore an affordable housing target allocated to its LHMA may be inaccurate to meet affordable housing needs.

Therefore, Redditch Borough Council would not only wish to see targets for affordable housing at LHMA level but also detailed guidance from the RPB as to how cross-boundary targets within LHMA areas should be distributed, managed and monitored between local authorities within LHMA areas.

H11: What would the implications be of having a District level affordable housing target (as a minima) in the WMRSS?

It would be useful to have affordable housing targets expressed as a minima in the WMRSS. As the WMRSS forms part of the 'development plan' the inclusion of an affordable housing target would mean that there could always be the opportunity for LPAs to negotiate for the provision of affordable housing even if they did not have an up to date DPD policy. In this situation there would be a positive implication of having a district level affordable housing target (as a minima) in the WMRSS.

However in practical terms and with the recent publication of PPS3 it is unclear how a policy in a long-term strategic planning policy document would be able to establish a figure that is robust and defensible yet also of a meaningful threshold to cover the period to 2026. In other words, the need for the affordable housing policy in the WMRSS to be flexible, and long term may scupper its ability to set even minimum district level affordable housing targets up to 2026.

Usually it will be more practical for housing targets to be set by the local planning authorities who have the most robust information on affordable housing needs for their areas. If the target is set by a Regional body there is the possibility of an unrealistic demand for either too much or too little affordable housing. Nevertheless because of the above advantage of having a minima affordable housing target in the WMRSS, this is supported in general terms by Redditch Borough Council.

H12: Do you have any other ideas on how levels of affordable housing delivery can be better directed by the WMRSS?

Redditch Borough Council considers the following to be appropriate mechanisms:

- (i) The RPB could produce a policy allowing in principle, 100% affordable housing schemes above WMRSS general housing targets in locations where there is a proven need and if necessary as an exception to policies of development restraint.
- (ii) The RPB could produce an SPD based on a broad-brush affordable housing policy to provide up to date information about affordable housing targets in different districts/LHMAs.
- (iii) The WMRSS should be aligned more to pick up on socio-economic issues around the provision of affordable housing to ensure there are strong and sustainable communities.

It has been recognised through national studies that poor access to public transport can impact on jobs, education and training. This in turn prevents breaking out of the cycle of social exclusion. It also undermines Government objectives that are essential to combat poverty and social exclusion.

H13: Evidence from monitoring suggests that no more than 3,000 affordable houses, with subsidy, are likely to be built each year across the Region. Do you have robust evidence to support or contradict this view?

Redditch Borough Council has no evidence concerning the future provision of affordable houses with subsidy and considers that the Housing Corporation is best placed to answer this question. The following table indicates the level of provision achieved in Redditch Borough between 1 April 1997 and 31 March 2006.

Number of Affordable Housing Units which have been Subsidised from 1997 to 2006 by the Housing Corporation (or up to April 2003 by Redditch Borough Council via LASHG)

Scheme	Number	RSL	
Sillins Avenue	20	Accord/Redditch Co-Op	
Farm Road	16	Accord/Redditch Co-Op	
Rough Hill Drive	30	Accord/Redditch Co-Op	
Forest View	3	Accord/Redditch Co-Op	
Ash Tree Road	6	Accord/Redditch Co-Op	
Breedon Gardens	17	Accord/Redditch Co-Op	
Sunningdale Close	21	Accord/Redditch Co-Op	
Holyoakes Close	28	Accord/Redditch Co-Op	
Parsons Road	12	Accord/Redditch Co-Op	
Pioneer Close	23	Accord/Redditch Co-Op	
Union Street	16	Accord/Redditch Co-Op	s106
Brockhill Phase 2	39	Festival	s106
63 Beoley Road West	1	Rooftop	
Total Subsidised Units	232		
Auxerre Avenue	Appr 30	To Be Selected	
Walton Close	20	Accord/Redditch Co-Op	

H14: Should the WMRSS identify those parts of the Region with a relatively high need for social housing where a lower threshold for negotiating Section 106 agreements with the private sector should be considered in LDDs?

There is no need for the WMRSS to identify what parts of the Region should consider lowering the threshold. The new PPS3 has reduced the threshold and provides for local planning authorities to reduce this threshold further if the demands for affordable housing, supported by robust evidence, are evident.

H15: Do you have any robust evidence on an appropriate housing mix within new developments that are needed in different parts of the Region?

Redditch Borough Council has both a Local Housing Needs Assessment and a 'Balancing Housing Markets' report which provide the authority with the evidence required to deliver an appropriate mix of housing on developments within Redditch Borough. Redditch Borough Council, with its partners in the South Housing Market Partnership, has commissioned a Housing Market Assessment for the sub-region which will further assist in providing robust evidence.

MANAGING HOUSING DEVELOPMENT

H16: Options Two and Three imply release of land in the foci and other urban areas earlier than anticipated in the WMRSS – do you agree with this approach?

Redditch Borough Council agrees with the approach implied by Options 2 and 3 about releasing land in the foci and other urban areas earlier than anticipated in the WMRSS.

Redditch Borough Council is of the opinion that an earlier release of land in the foci and other urban areas would contribute to a more realistic attempt at meeting proposed annual build rates. If, as the WMRSS is suggesting, the Government wishes to impose increased housing targets on the Region, then some level of implementation needs to be considered as early as possible in the Plan period. With the possibility of so many local authorities having to provide for extremely large scale development, earlier releases of land would allow for infrastructure to be put in place which would in turn allow annual build rates to be more realistically achievable. However, it should be noted that it would be inappropriate to bring forward the release of large swathes of land to meet housing targets up to 2026 in the absence of approved Site Specific DPDs.

Redditch Borough Council considers however, that the early release of brownfield and greenfield sites in urban areas would meet the criteria of sequential testing in its recently adopted Local Plan that has an anticipated end date of 31 March 2011. The sub-regional foci and urban areas should be permitted to release land earlier than 1 April 2011 on sustainable sites where an appropriate policy framework already exists.

It is pointed out that some authorities e.g. Redditch Borough is currently in a housing moratorium situation. It seems inappropriate to continue with the moratorium and then suddenly shift to a housing development policy with significant build rates.

H17: It could be considered that the Government's growth agenda implies that the use of maxima targets for areas outside the MUAs is inappropriate – do you agree with this approach?

Redditch Borough Council considers that the use of maxima targets for areas outside the MUAs is appropriate as the WMRSS is underpinned by urban renaissance. The achievement of the urban renaissance objective would be compromised if development targets were exceeded in shire districts.

H18: Do you think the use of minima targets for the MUAs is still appropriate?

Redditch Borough Council considers that the use of minima targets for the MUAs is still appropriate.

The MUAs are challenged with the aim of meeting the principles of urban renaissance in the Region. The MUAs are expected to take higher levels of growth and development. To restrict this growth with maxima targets would be inappropriate. Maximum development without resulting in town cramming, should be encouraged via planning policy in the MUAs and the use of minima targets is a tool for achievement of urban renaissance.

Questionnaire on: Spatial Options - Employment

Employment Land

E1: Do you agree that future employment land requirements should be quantified in the WMRSS?

If employment land is not quantified in the WMRSS, individual authorities will calculate their own land requirements, the WMRSS would have general guidance on the type of methodology that could be used.

Redditch Borough Council considers that quantifying future employment land requirements in the WMRSS to be essential. Detailed provisions set in the WMRSS would give more weight to employment land allocations at district level which would be less open to interpretation and challenge. Broad-brush general guidance for local authorities could have a detrimental effect on the supply of employment land. From the approval of the Phase II Review by the Secretary of State the employment land supply figure up to 2026 would be in place. This gives "certainty" and would speed up the process of preparing DPD's.

Employment land is often under threat from proposals for residential development which offer a higher land value. Establishing employment land figures and facilitating their protection are two very important roles for the WMRSS.

E2: If the amount of employment land requirements is included, should it be broken down to Strategic Authority or district levels?

The amount of employment land requirements in the WMRSS should be broken down to district level, again to assist in the protection of employment land. If broken down to Strategic Authority level, within any district it could always be argued that an employment site could be developed for other uses and the employment site replaced elsewhere within the Strategic Authority. This could result in employment development in a given district not being in balance with the new residential development in the same district. This sort of situation would not constitute sustainable development as it would increase the probability of commuting.

Redditch Borough Council also considers that employment land requirements included in the WMRSS should be broken down to district level is because the Council is concerned that if employment land requirements are only broken down to Strategic Authority level, there would be no mechanism in place to distribute allocations to each district.

E3: Do you agree with the principle of a reservoir of employment land?

Redditch Borough Council disagrees with the principle of a reservoir of employment land. Redditch Borough Council considers that employment land allocations should be in balance with housing land allocations and considers that a balanced allocations approach to be the preferred methodology for achieving the principle of balanced and sustainable communities. If an employment reservoir is based on past trends and the housing allocations are based on new population projections and/or a policy shift to deal with in-migration this would be illogical.

Redditch Borough Council considers that the principle of providing a balanced portfolio of sites for its district for the extent of the plan period would provide a more robust approach to the provision of employment land than the principle of a reservoir of employment land. If a reservoir based approach was to be taken, Redditch Borough Council considers that potential economic investment and prosperity in its district could be lost if a suitable site for inward investment did not appear in its current reservoir of sites. A portfolio of sites for the extent of the plan period would more likely meet the needs of investors.

Another issue which concerns Redditch Borough Council with respect to a reservoir of employment land is the likelihood of landowners failing to release land for employment development in anticipation that it could be developed for other uses i.e. housing, when the reservoir of sites was reviewed.

E4: What period of time should the reservoir cover?

Redditch Borough Council considers a reservoir of employment land to be a wholly inappropriate method for providing employment land in balance with housing targets. Redditch Borough Council would wish to see enough employment land allocated within its district for the duration of the plan period in order to encourage inward investment in line with housing supply in order to support its development as a sustainable community.

If there was a reservoir, Redditch Borough Council considers that it should cover a five year period. Economic conditions can change rapidly due to a range of global and local forces and therefore a review of the reservoir should take place fairly regularly. A period of 5 years also constitutes a common term for leases and breaks clauses within leases and, therefore, would better fit with the lifecycle of commercial property use.

E5: Should employment land requirements in the MUAs be identified as maximum or minimum figures?

i.e. should the reservoir figures identified in Table Three on page 38, act as maximum or minimum figures.

For all districts in the West Midlands (in MUAs and outside MUAs) minimum figures should be used for employment land requirements as this would ensure the protection of essential employment land, but also allow for further land to be developed for employment use if appropriate. Redditch Borough Council would expect employment land requirements in the MUAs, at regional foci and at other large settlements to be identified as minimum figures. This would be a tool for delivering "prosperity for all" as employment development would not be curtailed.

Redditch Borough Council reiterates its responses to questions E3 and E4. It considers the approach of a reservoir of land to be inappropriate for all settlements in the West Midlands. Redditch Borough Council would wish to see enough land allocated for employment in the MUAs and outside the MUAs to provide the greatest choice of supply, both in terms of size and quality in order to fully regenerate and enhance all areas of the Region. It is essential that the amount of readily available employment land should be in balance with the housing allocations for all areas and both should come forward for development at an appropriate rate to meet the economic and social needs of the Region.

E6: Outside of the MUAs should employment land figures be identified as maximum or minimum figures?

For all districts in the West Midlands (in MUAs and outside MUAs) minimum figures should be used for employment land requirements as this would ensure the protection of essential employment land, but also allow for further land to be developed for employment use if appropriate. Redditch Borough Council would expect employment land requirements in the MUAs, at regional foci and at other large settlements to be identified as minimum figures. This would be a tool for delivering "prosperity for all" as employment development would not be curtailed.

Redditch Borough Council reiterates its responses to questions E3 and E4. It considers the approach of a reservoir of land to be inappropriate for all settlements in the West Midlands. Redditch Borough Council would wish to see enough land allocated for employment in the MUAs and outside the MUAs to provide the greatest choice of supply, both in terms of size and quality in order to fully regenerate and enhance all areas of the Region. It is essential that the amount of readily available employment land should be in balance with the housing allocations for all areas and both should come forward for development at an appropriate rate to meet the economic and social needs of the Region.

E7: Should employment land requirements set out in Table Three on page 38, be adjusted to take account of:

Number and type of households,
Anticipated changes in past trends,
Labour supply growth,
Population,
The need to provide a portfolio of employment sites,
Increased need for waste management facilities, see waste Options,
Areas of deprivation and employment need,
Other suggestions.

Number and type of households

Redditch Borough Council considers that appropriate regard should be had to the ratio of employment land to housing provision and it considers that the approach being proposed by the WMRSS would result in a significant shortfall of employment land allocations in comparison to likely housing targets.

Redditch Borough Council observes that the WMRSS approach of basing its estimates for future employment land requirements on past trends would result in a severe imbalance of housing and employment land and is contrary to the principles of urban renaissance and sustainable development.

Anticipated changes in past trends

New housing targets and employment targets should be in balance e.g. employment targets should only be based on past trends if housing targets are based on past trends. The employment land requirements should reflect anticipated changes in past trends e.g. if there is a policy shift for housing targets to meet in-migration requirements this should be reflected in the employment requirement. However, it is important to note that the ability of any district to accommodate development needs to be considered in relation to all development allocations.

It is also pointed out that because of the rapidly changing economic climate of the Region, Redditch Borough Council considers it wholly inappropriate to base employment land requirements on past trends.

Labour supply growth

Redditch Borough Council considers that employment land requirements should be in proportion to housing targets to encourage people to live and work in the same area, thus reducing the need to travel to work and therefore create sustainable communities. Labour supply growth will exist due to imposed housing targets and employment land requirements should be set to allow for this.

Population

See comments relating to Number and type of households.

The need to provide a portfolio of employment sites

A range of employment sites in terms of size, cost and quality is required to meet a range of business needs so a balanced portfolio is necessary. Thus in terms of economic growth the issue is not just the quantity of sites available but also the range of sites is a fundamental requirement in order to encourage the widest and most diverse range of economic activity in all areas.

Increased need for waste management facilities

Yes, given the need for increased diversion of waste away from landfill and the need for treatment facilities, it is essential to ensure that sufficient land is available.

Areas of deprivation and employment need

Where areas of deprivation and employment need are identified and demonstrated the employment land requirement should be adjusted upwards. However the targets for other districts should not be altered by way of compensation as each district should have a balanced housing and employment target as a general policy approach.

Other

Regard should be had to existing stock of occupied and unoccupied employment units by size, type, cost and quality and take up of such units.

Employment land requirements should consider the existing employment supply and give consideration to whether a site is 'readily available' in terms of the intentions of the land owner. Some allocated employment sites are owned by house builders who would prefer to develop their sites for housing use and can therefore retain an undeveloped site until they are able to attempt to secure change of use. This situation gives a false impression in terms of the employment land supply in a district.

E8: Do you have any comments on Table Three?

For example, you may wish to consider whether the figures are sufficient to meet the employment land requirements of a particular area or whether there would be any conflict with the policy objectives of the Spatial Strategy.

Redditch Borough Council would like to make the following observations in relation to employment land requirements for Redditch Borough up to 2026:

Housing and Employment targets should be "in balance"

Housing and employment targets should be in balance to achieve sustainable development. This correlation for "other large settlements" should be clear in the WMRSS e.g. in the Worcestershire County Structure Plan, it was 1 ha of employment land per 70 dwellings. At present, WCC, as part of its response to this WMRSS consultation, is carrying out a review of its methodology to ascertain if 1Ha to 70 new dwellings is indeed appropriate and, if not, what is. Redditch Borough Council would suggest that until an appropriate methodology can be ascertained and applied to provide a balance between housing and employment land targets, caution should be had by the RPB with respect to the figures in this table. If Redditch Borough is to take Birmingham related housing growth (Option 3), then it follows that it should take a corresponding employment requirement, otherwise WMRSS objectives will not be achieved with regard to Redditch Borough.

If for example, the WCC methodology were to be applied, Redditch Borough would need to find the following land to meet employment targets to be in balance with housing targets:

Option 1 = 4300 dwellings = 61 Ha employment land

Option 2 = 8200 dwellings = 117 Ha employment land

Option 3 = 13200 dwellings = 189 Ha employment land

For the period 2001 to 2006, Redditch Borough Council had 40.48 Ha of employment land (completions and commitments) (rounded to 40 Ha) which can count towards a WMRSS employment target up to 2026. This would however, leave Redditch Borough with the following shortfalls in employment land allocations for each of the 3 Options (based on WCC methodology):

Option 1: 61 Ha – 40 Ha = 21 Ha shortfall

Option 2: 117 Ha – 40 Ha = 77 Ha shortfall

Option 3: 189 Ha – 40 Ha = 149 Ha shortfall

The shortfall for all three options would equate to a significant amount of additional land to be allocated in the Green Belt for employment purposes.

In conclusion, using the WCC methodology above for calculating employment land requirements, and taking account of the amount of housing land to be found in the Green Belt (pg. 23 of this response), the following amounts of Green Belt land would be required to provide housing and employment targets in balance for Redditch Borough:

	Option 1	Option 2	Option 3
Housing shortfall (pg 23 of this Response)	285 dwgs	4185 dwgs	9185 dwgs
Housing land shortfall @ 30 dph	10 Ha	140 Ha	306 Ha
Employment land shortfall (based on WCC methodology)	21 Ha	77 Ha	149 Ha
Additional land to be found in the Green Belt to meet each of the three options for Redditch Borough and to ensure a balance between Housing and Employment allocations	31 Ha	217 Ha	455 Ha

There should be land available to accommodate Housing and Employment land targets

Before the Preferred Option is progressed, the RPB should undertake a study to identify how much balanced development (housing and employment) can be accommodated within/adjacent Redditch Borough. It is difficult to identify where Redditch Borough Council could allocate an additional 35-40 hectares of employment land. It is believed that a further area of approximately 15 hectares could be developed around Ravensbank within the administrative area of Bromsgrove District Council. This issue relates to the issues raised under H7. Redditch urban area abuts its administrative area on three sides and a study with other neighbouring districts would need to be undertaken to identify locations for development for both employment and residential purposes. Cross-boundary issues should be addressed via a key diagram or via policy.

The reservoir should not restrict Employment Development

The reservoir should not prevent the development of sites larger than the total within the reservoir, e.g. Redditch has a suggested reservoir of 7/8 hectares – therefore, what would happen if there was a 10 hectare site that could come forward to meet Redditch related growth?

Use of Past Trends is inappropriate

Redditch Borough Council considers the WMRSS approach of basing its estimates for future employment land requirements on past trends to be wholly inappropriate given the changing economic climate. Furthermore with respect to past trends, i.e. land developed 1995 - 2004 (on the table on page 38), Redditch Borough Council considers that as some land (18.8Ha) during this period, was developed in Bromsgrove District for Redditch related growth, that the figures in this table give a false representation of 'past trends' for Redditch Borough.

Redditch Borough Council is therefore of the opinion that all figures in Table Three with respect to Redditch Borough and its future long term employment land requirements are flawed. If Redditch Borough is to take Birmingham related housing growth (Option 3), then it follows that it should take a corresponding employment requirement, otherwise WMRSS objectives will not be achieved with regard to Redditch Borough. A study needs to be undertaken to identify how much balanced development (housing and employment) can be accommodated within/adjacent Redditch Borough as stated in its response to question H7.

Protection of Employment Land

PEL1: Should the WMRSS give more guidance on the need to retain employment sites which can contribute to the portfolio of employment land?

Redditch Borough Council holds a very strong view that the WMRSS should give more guidance on the need to protect all employment sites including guidance on the need to retain employment sites which can contribute to the portfolio of employment land.

Robust guidance would ensure that a range of employment sites are available in terms of size, cost and quality. When employment land is lost to alternative uses it is rarely re-used for employment, particularly when redeveloped as housing. Protection of employment land is required to safeguard long term future needs as well as short term needs.

Redditch Borough Council would welcome WMRSS guidance regarding the retention of employment sites which can contribute to a balanced portfolio of employment land. Redditch Borough Council considers that if employment sites are identified through review and assessment in order to provide a balanced portfolio, then it is unlikely that redundant sites with no potential reuse or development for employment uses would be included in such a portfolio.

However, Redditch Borough Council considers that the WMRSS should not only give guidance on the protection of employment sites but also that it should provide guidance for assessing whether a site is redundant beyond re-use. Redditch Borough Council would welcome the inclusion in WMRSS policy, of stringent criteria which must be met before employment land is relinquished for alternative development. Serious consideration should be given to partial site development for other uses such as housing if this would provide appropriate funds to remediate the remainder of the site for employment uses. The addition of such a robust mechanism in the WMRSS would ensure that, as far as possible, employment sites are safeguarded to meet future employment needs.

PEL2: Should the WMRSS identify the need to protect waste management sites from competing uses?

Yes, it is essential that existing sites are safeguarded and, where suitable and appropriate, are expanded to meet local need. This is important to protect sites from potentially competing alternative uses. This must take account of the factors stated to minimise community and other opposition.

Regional Investment Sites

RIS1: Do we fill the gaps in the provision of RIS?

Redditch Borough Council has no comment.

RIS2: If yes, what processes should be used for filling the gaps in provision?

For example, the WMRSS could set the context for sub-regional studies which would consider gaps in provision.

Redditch Borough Council has no comment.

RIS3: Is there a need to change the policy on the control of uses on RIS?

The current WMRSS policy restricts development to high-quality uses falling within use class B1 for example, offices and research and development facilities. In some parts of the Region high quality B2 (general industrial) uses are also permitted.

It is very difficult to assess whether a company is 'high-tech' purely in terms of its planning use class. Many B2 operations involve high-tech processes and on-site research and development. The principle of clusters which have been aligned with HTCs involve not only the clustering of high-tech industries, but of supporting industries. Such supporting industries may not necessarily be B1.

Major Investment Sites

MIS1: Do you think that the WMRSS has adequate MIS provision?

You should also consider the adequacy of MIS provision in the event that Ansty is not maintained as a MIS.

Redditch Borough Council can see the logic in having regional logistics sites as they need to be close to the motorway and provide units of at least 200,000 sq. ft. and which cannot be accommodated on most business parks. Redditch Borough Council is not sure what the demand genuinely is for such sites.

MIS2: If no, what are the options for additional provision?

Redditch Borough Council has no comment.

MIS3: Should more flexibility be introduced to the MIS policy?

For example: the current policy restricts occupation of a MIS to a single user. Do you agree that this should continue to be the case?

Redditch Borough Council considers that more flexibility should be introduced to the MIS policy. It is difficult to find large sites for single occupiers requiring less than 50 hectares. It is suggested that a maximum of three occupiers be permitted to occupy an MIS. This may more closely align with demand.

Regional Logistics Sites

RL1: Significant growth in logistic provision in the Region is anticipated. Should part of this growth be accommodated on RLS?

Redditch Borough Council considers that significant growth should be accommodated on RLS. Demand for large distribution sites is strong and the existence of an additional RLS could steer such developments towards more sustainable sites.

RL2: If yes, how many RLS are needed?

Redditch Borough Council considers that it would be useful to have an additional site south of the Birmingham conurbation.

RL3: The Stage Two study recommends the following criteria for RLS. Do you agree?

At least 50 hectares of development land available.

Good rail access. Defined as: a generous loading gauge which is capable of accommodating inter modal units on standard platform wagons, the ability to handle full length trains, available capacity to run freight train services and permits full operational flexibility.

Has good quality access to the highway network. Defined as being served by the national motorway network or major non-motorway routes which show low levels of network stress (congestion) and allow reasonable vehicle operating speeds.

A suitable configuration which allows large scale high bay warehousing, inter modal terminal facilities, appropriate railway wagon reception facilities and parking facilities for all goods vehicles both those based on the site and visiting the site.

A need for such facilities due to demand from the logistics market which cannot be met in the medium to long term by existing capacity.

Located away from incompatible neighbours, allowing 24 hour operations no restrictions on vehicle movements.

Has good access to labour. Defined as being a sub region of employment need, having reasonable levels of qualification at NVQ Level 1 and 2 and opportunity to improve qualification levels, being a net exporter of lower order labour, and having a competitive wage rate for relevant lower order occupations.

Minimising the impact on the local environment.

Suggest other criteria

Redditch Borough Council agrees if such a site exists. However, it considers that some flexibility may be required on some of the criteria.

RL4: WMRSS Policy PA9 currently identifies Telford and North Staffordshire as being priority locations for RLS. A rail freight facility is already under construction in Telford which will play an important sub-regional role serving the west of the Region. No RLS provision has been made in North Staffordshire.

Is North Staffordshire still an appropriate location for RLS provision?

Redditch Borough Council has no comment.

RL5: Do you agree that these areas are the best broad locations for RLS provision?

A: Based around the M6 Toll, A5, A38, West Coast Main Line (WCML) and Derby to Birmingham railway line transport corridors. Covers the administrative areas of the eastern part of East Staffordshire, Lichfield and Birmingham to the north of the M6.

B: Based around the M6 Toll, M6, M54, A5, Stour Valley railway line, Cannock Branch railway line and the Wolverhampton to Telford railway line transport corridors. Covers the administrative areas of Wolverhampton, South Staffordshire (except the area to the west of Dudley), Walsall and Cannock Chase.

C: Based around the M6 Toll, A5, M42, WCML, Derby to Birmingham railway line, and Whitacre and Nuneaton railway line transport corridors. Covers the administrative areas of Tamworth and North Warwickshire.

D: Based around the M6, M69, A5, WCML and Rugby and Birmingham railway line transport corridors. Covers the administrative areas of Nuneaton and Bedworth, Coventry and Rugby.

Other suggestions.

See Redditch Borough Council's response to question RL2.

RL6: Should priority be given to the extension of existing RLS where there is spare capacity available at the existing rail freight terminal? Alternatively, where sites cannot be extended should satellite sites be considered? Satellite sites would utilise the rail freight infrastructure at an existing RLS. A pre-requisite for a satellite site would be the availability of spare capacity at the existing rail terminal.

Redditch Borough Council has no comment.

Strategic Centres

SC1: Do you have any comments on the levels of provision, see page 45?

Redditch town centre is tightly constricted with respect to potential expansion as it is surrounded by the 'concrete collar' of the ring-road network. Therefore Redditch Borough Council considers that it may be physically impossible to accommodate significant additional floorspace within its retail core, although this would need to be investigated further.

In addition to this observation, there is currently over 23,500 sq m of vacant retail floorspace within the town centre. Redditch Borough Council would wish to query the allocation of an additional 20,000 sq m of retail floorspace in the WMRSS as it considers that there may not be the demand for this amount of additional floorspace given the current vacancy rates although it is recognised that demand might increase with a larger population.

However, Redditch Borough Council would wish to point out that its major retail core is privately owned and therefore Redditch Borough Council has no idea of the future expansion plans of the owners. The current centre owners have, over the last three years, carried out significant improvements to encourage inward retail investment to Redditch town centre and are currently making significant leisure additions which will contribute to the evening economy of the town centre.

Redditch Borough Council does concur that its town centre would benefit from a reduction in the current vacancy rates in order to promote vitality and viability of its town centre.

Redditch Borough Council considers that the town centre may need to increase its amount of retail floorspace in order to accommodate the needs of a growing population. However, Redditch Borough Council would expect the allocation of additional floorspace to be in proportion with differing potential levels of housing allocations. The Borough Council considers that it is important to find out if the net additional comparison retail development target can be physically accommodated.

SC2: Do you have any comments on the assumptions included in the Regional Centres Study?

The Borough Council is of the view that the Regional Centres Study should have recommendations about retail development targets that take into account the capacity of an area to absorb the figures quoted. Furthermore, the study does not take into account existing vacant retail premises or occupied premises that may become vacant at some point.

SC3: Do you have any comments on these suggested thresholds for referral to the RPB, see page 46?

Redditch Borough Council is of the view that within the Town Centre, as identified on the recently adopted Local Plan Proposals Map, there should be no referrals to the Secretary of State for retail or leisure development. However outside of this Town Centre boundary the suggested 10,000m² retail referral target is considered appropriate with the exception of situations where a 10,000m² retail development would be in accordance with an up to date development plan policy/proposal.

SC4: Should an upper limit for development in non-strategic centres be introduced in order to protect the role of the strategic centres?

Page 45 of the WMRSS Consultation document states under the heading "Retail and leisure", that, "Retail and leisure development are driven by the amount of people in a centre or its catchment area". Based on this logic it follows that where there is a locally based demand for retail and leisure then it should be satisfied.

For sustainability reasons it is important that people shop and use leisure facilities close to where they live and a policy with a sequential test could be included in the WMRSS to ensure that this happens. With this approach there would be no need for an upper limit - instead the applicant would need to demonstrate that the application site was sequentially acceptable and related to the catchment area of potential users.

SC5: Do you think that WMRSS policies should give priority to centres where people currently travel away for retail and leisure?

Redditch Borough Council is of the view that, yes, it would be appropriate for the WMRSS to give priority for retail and leisure development to centres where people currently travel away. Such a priority would help address the problem and promote sustainable development as people may be more likely to shop and spend their leisure time closer to where they live.

SC6: Do you think that WMRSS policy should support this regeneration approach, see page 47?

Redditch Borough Council agrees that WMRSS policy should support the regeneration of centres such as Redditch town centre but considers that allocating specific retail targets may not be the best approach. Redditch Borough Council considers that the development of town centre strategies would promote regeneration in terms of a wider range of town centre uses rather than imposing retail allocations in isolation to the broader needs of centres requiring regeneration.

It is pointed out that there should be a direct link with the Regional Economic Strategy to enable support for the approach from both a planning and an economic perspective.

SC7: Do you think that WMRSS policy should support the market led/opportunity approach, see page 47?

Redditch Borough Council holds the view that WMRSS policy should not support the market led/opportunity approach. The market will stimulate development to the areas of the Region where centres are described as "healthy", "very healthy" and with "aspirations to expand" if sites are available. Excessive development of these centres would detract from other strategic centres and would therefore increase travelling between centres and be unsustainable.

Offices

O1: Do you have any comments on Table Four that will help the RPB to develop an office provision policy, see page 50?

Redditch Borough Council considers that the identification of specific allocations for office provision is misleading. Redditch Borough Council is unsure whether the allocation of office floorspace forms part of, or is in addition to, the employment allocations in Table Three of the Spatial Options document. Redditch Borough Council also queries the necessity of a specific allocation for office provision and considers it to be inappropriate. Furthermore, irrespective of whether or not the office allocation is included in the employment allocation, or is in addition, Redditch Borough Council considers that the allocation should be in proportion to housing targets otherwise there is a threat to the balance of communities.

Redditch Borough Council has great reservations about being allocated an office target of 30-40,000 sq m within its strategic centre and 20,000 sq m elsewhere. With respect to Redditch town centre, A2 uses are restricted to areas beyond its main retail core. Redditch Borough Council considers that there is limited scope for the identification of allocated sites for office use beyond its retail core within the town centre and considers 20,000 sq m elsewhere to be excessive.

Redditch Borough Council also has concerns that the requirements in Table Four are in terms of floorspace requirements rather than gross site requirements. Assuming that local authorities will have to identify sites for development, Redditch Borough Council is concerned as to what site areas are specifically allocated for offices and how local authorities can specify the amount of floorspace to be provided on gross sites. Historically, the monitoring of land for employment is based on gross site area and the floorspace provided by the footprint of the building. Monitoring makes no allowance for 'multiple floors' and Redditch Borough Council is concerned about how monitoring will take place in the future and would expect detailed guidance on the matter from the RPB if an office provision policy is to be developed.

O2: Do you think the Centres Study has identified the right levels of additional office floorspace/development?

Redditch Borough Council has concerns regarding the validity of data contained in the Centres Study as the WMRSS Spatial Options document states that "the levels of provision set out in the Centres Study are ambitious." It goes on to say that "projections are trend based and do not currently fully take into account physical or policy constraints that might limit a centre or a local authority's ability to accommodate such levels of development or economic aspirations." Redditch Borough Council considers this second statement to be pertinent to Redditch Borough.

O3: If no, do you have any robust evidence that can support your comment and the development of the Preferred Option?

Redditch Borough Council is aware that there is currently 3,042 sq m of vacant office space within its town centre. With respect to Redditch Borough town centre offices have a much lower quoting rental price than out of centre offices with typical differences of around £43 per sq. m. This is indicative of the lower demand for floorspace within the town centre in comparison to out of centre locations and can be attributed to limited parking and accessibility. It would be difficult to accommodate significant additional office floorspace within the town centre and Redditch Borough Council considers that there may not be the demand.

O4: Do you think this sequential approach to out-of-centre office development is the best approach?

Redditch Borough Council considers that a sequential approach may not be suitable for all locations or in all circumstances. For example, applying the sequential approach in Birmingham is very different to applying the sequential approach in Redditch Borough.

Redditch Borough has a small town centre with limited public transport links (bus routes focus primarily on transporting passengers around Redditch Borough rather than to/from other locations and there is only one train line transporting passengers from Redditch Borough to Birmingham). The distance from the edge of the urban area of the Borough to the town centre is only 2.5 miles (4km) and therefore office developments on the edge of the district are far closer to the town centre than they would be in comparison to a development on the edge of Birmingham. Many businesses choose to locate in Redditch Borough due to its proximity to the motorway network. Such businesses, particularly those whose staff need to travel in and out of the office on a daily basis, prefer out of centre locations as close to the motorway network as possible, with sufficient parking.

O5: Do you think WMRSS policy should set out maximum percentages for out-of-centre office development?

Redditch Borough Council considers that WMRSS policy should not set out maximum percentages for out-of-centre office development. Such an approach does not take into consideration the availability of land within the centre for office development or demand for such land in comparison to out of centre locations. Even where land is available within a town centre, higher value uses are more likely to be sought on such sites and therefore the prospect of development for offices may be limited.

Redditch Borough Council considers that the RPB should be more concerned with setting appropriate targets for office provision with respect to the balance of housing and employment provision than being concerned with setting maximum percentages for out-of-centre office developments.

O6: If yes, what percentage would you suggest?

Redditch Borough Council has no comment.

O7: Do you think that WMRSS policy should set out criteria for out-of-centre office development?

Redditch Borough Council can see benefits in setting criteria for out-of-centre office development as the criteria established could include the issues identified in the response of the Council to question O5 e.g. the availability of land within the Town Centre.

O8: If yes, what criteria would you suggest?

Refer to Redditch Borough Council's response to question O5.

O9: Do you have any additional comments about out-of-centre office development?

Redditch Borough Council has no comment.

Regional Casinos

RC1: Should the guidance in the WMRSS for where regional and large casinos go be based on assessing the impact on Urban Renaissance?

Redditch Borough Council has no comment.

RC2: Should WMRSS policy state that large casinos should in the first instance be in town and city centres?

Redditch Borough Council has no comment.

RC3: Should the guidance in the WMRSS on where regional and large casinos go be based on assessing the impact on Urban Renaissance, RC1, however add more specific local criteria both in terms of location and potential benefits?

Redditch Borough Council has no comment.

RC4: If yes, what criteria would you suggest?

Redditch Borough Council would like to make the following observations regarding casinos:

There is ample evidence from national and international studies on the adverse affects of gambling on individuals, families and local communities.

Work currently being undertaken on the priority outcome within the Worcestershire Local Area Agreement to reduce deprivation, including child and pensioner poverty suggests that there are more appropriate ways to regenerate an area through investing in people and providing an infrastructure to enable people to have improved life chances.

Questionnaire on: Spatial Options - Waste

A collaborative response to the waste section of the Regional Spatial Strategy has been prepared by the Joint Members Waste Resource Management Forum for Herefordshire and Worcestershire (includes all six districts as well as Worcestershire County Council and Herefordshire Council). Redditch Borough Council considers it appropriate to support the Joint Members Waste resource Management Forum's view as these issues are of a strategic nature.

Managing Your Own Waste

W1: Should the WMRSS set out the principle that each Waste Planning Authority, or sub region, should manage waste; in accordance with the Waste Hierarchy, and; allocate enough land in its Local Development Documents to manage an equivalent tonnage of waste to that arising within its boundary, taking into account the appropriate growth in waste arising from the formation of new households and the diversion of Commercial and Industrial Waste from landfill?

Yes the WMRSS must be founded on the principle that each WPA/ sub region manages its waste in accordance with the Waste Hierarchy and locates enough land in its LDDs to manage an equivalent tonnage of waste to that arising. This will ensure alignment with the Joint Municipal Waste Management Strategy which is founded on both the Waste Hierarchy and the proximity principle

While the principle of managing waste within the region it is produced is sound, it is also necessary to allow authorities the option of looking across regions to neighbouring authorities where facilities may be closer than those within the same region and also to ensure resilience. Also there may be specialist facilities which are needed to treat waste, e.g. recycling processing facilities, which are only found outside a region and it is not economically or environmentally sustainable to provide these facilities at a regional level.

It is important that provision is made to accommodate fully growth arising from the formation of new households and diversion of Construction and Industrial waste away from landfill.

W2: If no, suggest an alternative approach;

No alternative proposed

W3: Should the basis on which WPAs identify sites be based on safeguarding and expanding suitable sites with an existing waste management use?

However they need to be capable of meeting a range of locally based environmental and amenity criteria and have good transport connections?

Yes given the difficulties we have faced in Herefordshire and Worcestershire of securing new sites, it is essential that existing sites are safeguarded and where suitable and appropriate are expanded to meet local need. This is important to protect sites from potentially competing alternative uses. This must take account of the factors stated to minimise community and other opposition. However, due to the increasing need to seek alternative treatment technologies to landfill, it is imperative that new sites will need to be provided in addition to existing waste management facilities.

W4: Should the basis on which WPAs identify new sites be based on the following criteria;

Good accessibility from existing urban areas or major planned development; and good transport connections including, where possible, rail or water, and compatible land uses, namely,

- **Active mineral working sites; or**
- **Previous or existing industrial land use; or**
- **Contaminated or derelict land; or**
- **Land within or adjoining a sewage treatment works; or**
- **Redundant farm buildings and their cartilage; and**
- **Be capable of meeting a range of locally based environmental and amenity criteria and have good transport connections?**

Yes these are all sound and relevant criteria. Where possible, these should be linked with the impacts of climate change.

Due to the increasing need to seek alternative treatment technologies to landfill, it is imperative that new sites will need to be provided in addition to existing waste management facilities.

W5: If no, suggest alternative criteria below;

See comments in response to Question W4.

W6: Should waste management facilities be permitted on open land, including land within the Green Belt, where it is

- close to the communities producing the waste; and
- where there are no alternative sites; and
- where it would not harm the openness of land or the objectives of Green Belt

Yes as noted in response to Question W4. It should be noted however that some communities object to the siting of new waste facilities close to residential properties.

Municipal Waste

W7: Do you have any comments on the tables on pages 59-60?

There is concern to ensure that the stated figures are correctly defined as this will impact upon subsequent modelling and delivery. The following comments represent the county wide position and are included after consultation with colleagues in the WDA.

W7(1) The narrative preceding the tables states that the tables show amount of **household** waste arising. However, the tables state that the tables show **municipal**. The classification of waste being modelled is critical, and will generate different figures as illustrated in the table below.

W7 (2) Baseline figures for the year 2005/6 do not reflect actuals; the actual figures for Worcestershire are shown in the table below.

Municipal Waste arisings in Worcestershire 2005/06

	Diversion	Residual	Total
Household waste	111,187	179,830	291,017
Municipal waste	126,261	192,875	319,136
Figs in table Option 1	72,000	238,000	310,000
Figs in table Option 2	72,000	240,000	312,000
Figs in table Option 3	72,000	242,000	314,000

Commercial and Industrial Waste

W8: Should the WMRSS policy for Commercial and Industrial Waste be based on:

a-low) the current levels of diversion of Commercial and Industrial Waste arising from landfill in Waste Strategy 2000?

b-medium) policies that reflect the levels of diversion in the draft Revisions to the England's Waste Strategy?

c-high) policies that reflects a higher rate of diversion, twice that of the draft Revisions to England's Waste Strategy, to anticipate a higher level of diversion arising from the increase in Landfill Tax and producer responsibility obligations?

The table below illustrates W8, (to 2025 to reflect the England's Waste Strategy 2000).

Landfilling as a % of total Commercial and Industrial Waste	2002	2010	2015	2020	2025
a – low	42%	41%	40%	39%	39%
b – medium	42%	37%	36%	35%	35%
c – high	42%	35%	30%	25%	25%

The WMRSS policy for commercial & industrial waste should be based on option b), **medium** (policies that reflect the levels of diversion in the draft Revisions to the England's Waste Strategy) as a minimum.

Our Joint Municipal Waste Management Strategy (JMWMS) treats waste as a resource and as a point of principle we are keen to see policies that will encourage this, including the development of resource recovery parks. It is difficult to support option c, **high**, as such developments will be driven commercially and there is a need to ensure a level of provision that is consistent with the Governments revised England's Waste Strategy.

Hazardous Waste

W9: Should the WMRSS include a policy which requires Waste Development Frameworks to safeguard existing sites for the treatment and management of Hazardous Waste?

Yes this is essential given the reducing numbers of such sites nationally and the need to ensure continued provision for legitimate disposal. Additionally local councils must continue to be able to dispose of material they are obliged to collect because it is illegally dumped within their areas. The location of such facilities should particularly seek to minimise problems associated with illegal disposal/fly-tipping of waste from urban areas in surrounding rural areas.

W10: If yes, should WMRSS policy state that Waste Development Frameworks in the Major Urban Areas give specific priority to identifying new sites for facilities, to store, treat, and remediate Hazardous Waste, including contaminated soils and demolition waste?

Yes, for the reasons stated in response to Question W9 and to minimise risks of increasing illegal disposal in the surrounding rural areas.

W11: Should WMRSS policy state that Waste Development Frameworks for the non MUAs, identify new sites for the disposal of Hazardous Waste, including where necessary encouraging the creation of protective cells in landfills for stable Hazardous Waste?

Yes, where this may be necessary to meet local need and is not accommodated in accordance with comments in response to Questions W9 & W10.

Construction and Demolition Waste

W12: Should the WMRSS encourage greater recycling of Construction & Demolition Waste through:
a) maximising 'on-site' recycling; and
b) promoting 'urban quarries' in the MUAs where material from a variety of sites can be recycled to a high standard?

Yes, the WMRSS should expressly support this given the wider benefits to be gained in terms of climate change.

Landfill

W13: Should the WMRSS policy state that Waste Development Frameworks restrict the granting of planning permission for new sites for landfill to proposals which are necessary to restore despoiled or degraded land, including mineral workings, or which are otherwise necessary to meet specific local circumstances?

Yes, as restricting the future availability of landfill is seen as key to altering the economic balance in favour of more sustainable forms of waste management.

W14: Should the WMRSS only support the allocation of new landfill sites in Waste Development Frameworks (WDFs) where they are supported by evidence of the depletion of existing landfill capacity and a shortage of capacity in the plan period following a study of the existing sites with planning permission for landfill, but which do not have a waste management license or permit from the Environment Agency?

Yes, as restricting the future availability of landfill is seen as key to altering the economic balance in favour of more sustainable forms of waste management.

Agricultural Waste

W15: Should the WMRSS include a policy which requires relevant WDFs outside the MUAs to identify sites for the treatment and management of Agricultural Waste based on the premise that:

- **agricultural undertakings adopt sustainable waste management practices with regard to waste arisings and best agricultural practice in relation to any wastes treated or disposed of on a farm; and**
- **opportunities for necessary additional sustainable waste management capacity in rural areas for waste recovery or recycling should be based on:**
 - **effective protection of amenity and the environment; and**
 - **the proposed activity is appropriate to the area proposed?**

Yes, such inclusion of such a policy is fully supported

Managing Waste in New Development

W16: Should all Local Planning Authorities in the Region include a requirement in their local validation checklist for all Full or Reserved Matters planning applications for developments in excess of 10 dwellings or 1,000 sq. metres, or outline planning applications for sites in excess of 0.4 hectares of development to include a Site Waste Management Plan, without which they will not be registered as valid?

Yes, SWMPs are strongly supported and Government should be urged to implement Section 54 of the Clean Neighbourhoods and Environment Act 2005 at the earliest possible opportunity.

W17: Should all Waste Planning Authorities in the Region include a requirement in their local validation checklist for all Full or Reserved Matters planning applications for waste management facilities to include information on annual throughput capacity in tonnages/ litres/ cubic metres (depending on the type of waste/facility), without which they will not be registered as valid.

Yes, this is strongly supported to provide a means of quantifying availability of waste management capacity and the extent of diversion from landfill.

W18: Should the WMRSS require all LDDs to have policies which require provision to be made in the design of all new residential and in commercial and industrial development for the segregated storage of waste and for on-site waste management to be part of the 'Design and Access Statements'?

Yes – this links with the Joint MWS for Herefordshire and Worcestershire published in November 2004 (see policy 14)

Additional Comments

1. The Joint Waste Resource Management Forum felt that it is important to stress that comments made are prior to the publication of the revised National Waste Strategy, which is expected in spring 2007. This will have a significant bearing on the future of waste management, for example the potential for introduction of 'carbon targets'.
2. Local Authorities are mainly concerned with management of Municipal Waste and have limited experience in dealing with some Commercial and Industrial waste from Small Medium Enterprises (SMEs), and no experience of dealing with Agricultural waste. It is therefore difficult to comment on these waste streams due to the limited role that the Local Authority has in dealing with them.

Questionnaire on: Spatial Options - Transport and Accessibility

Strategic Park & Ride

With respect to Transport and Accessibility Issues, Redditch Borough Council considers it appropriate to support the Worcestershire County Council view as these issues are of a strategic nature.

The responses below are taken from Worcestershire County Council's response to the RPB on the WMRSS Phase Two Revision consultation and have been endorsed by Redditch Borough Council.

SPR1: Do you agree that the criteria on page 73 are the right criteria?

SPR2: If not what else should be considered?

SPR3: Do you agree that Strategic Park and Ride locations may be categorised as "Edge of Major Urban Area" and "External Town"?

SPR4: Are the broad locations identified on page 74 the right ones, or should others be considered?

SPR5: Do you agree that the "Target Destinations" within the Region are the Centres identified in WMRSS Policy PA11?

SPR6: Is London the only "Target Destination" outside the Region that should be accessed by Strategic Park and Ride or are there others?

SPR7: Are there opportunities for Strategic Park and Ride in the West Midlands to provide access to "Target Destinations" outside of the Region?

SPR 8: Which of the three approaches (Criteria Based, Location or Target Destinations) do you feel would best provide the guidance needed and why?

Worcestershire County Council's Response endorsed by Redditch Borough Council:

Worcestershire Parkway Station is identified in the current RSS as a strategic Park and Ride facility serving the West Midlands conurbation. The County Council clearly wish to retain this position.

Three approaches to the identification of broad locations for strategic Park and Ride facilities are identified in the revision report.

- i) Criteria Based – this approach requires a site to fulfil certain criteria relating to the “ride” element (frequency, capacity and quality of the proposed service, as well as any implications that delivering the service may have upon existing passenger transport provision), the “park” element (environmental and traffic impact), and the location of the facility (potential for interchange and the potential relief on routes to the target destination(s)). These criteria are appropriate, and do not restrict the ability for potential schemes to be brought forward over the lifespan of the WMRSS document. Existing schemes that meet these criteria (including Worcestershire Parkway) should be retained within the WMRSS under Policy T12.
- ii) Location – this approach simply names sites that could potentially be used for a strategic Park and Ride facility and categorises them as Edge of Major Urban Area or External Town. It is unclear what benefit this approach brings when compared with the criteria based approach. There is no basis for the identification of Kidderminster within the list of sites included under the External Town category, as there are no proposals for a Kidderminster Park and Ride site. The main site that should be included under this category is, of course, Worcestershire Parkway.
- iii) Target Destinations – it would be worth considering the inclusion of a list of target destinations within the criteria to be included within the Criteria Based approach, rather than using this as a specific method of identifying strategic Park and Ride sites. In addition to Birmingham city centre, other target destinations that would be worthy of consideration include London, Birmingham International (for the Airport), and potentially Manchester city centre (for potential strategic Park and Ride facilities in the north of the Region (e.g. Stoke). It is unclear whether there is evidence to include other major centres within the West Midlands conurbation (e.g. Coventry or Wolverhampton) as target destinations in a strategic sense, or as secondary destinations in a similar manner to Worcester).

It is recommended that the preferred approach should be the Criteria Based approach as this will be the most flexible, and contains a reality check on the likelihood of a scheme coming forward by identifying how it relates to the existing transport network.

Car parking Standards

PS1: Does the West Midlands need to have regionally specific parking standards that are different to those set out in the national guidelines?

PS2: Should regional parking standards be identified for land uses not included in national guidelines (PPG13: Transport) and if so which?

PS3: Should some parking standards only be defined in Local Development Frameworks, and if so which?

PS4: Do you agree with these suggested criteria on page 76?

PS5: Should any other criteria be considered?

PS6: Do you agree with the principle of dividing the Region into settlement types?

PS7: Do you agree with the definitions of the settlement types on page 76?

PS8: Do you agree with the 50% and 20% reductions?

PS9: Do you agree with the Local Accessibility approach on page 77?

PS10: Do you agree with the 50% and 20% reductions?

PS11: Do you agree with this Site Specific Accessibility approach on page 77?

PS12: Do you agree that site specific considerations should result in a 50% or 20% reduction in provision?

Worcestershire County Council's Response endorsed by Redditch Borough Council:

Parking standards for new developments are currently set by the Local Planning Authority, with guidance from the Local Highway Authority and from PPG13. Given the diversity of the Region, it is difficult to see the value of applying a regional parking standard that contains little flexibility. Even in smaller towns, the situation can vary greatly and differing standards may be relevant. Current guidance builds in flexibility by simply identifying maximum parking standards for a range of land uses (but not housing or hospitals).

Of the four approaches identified, the preferred option is to promote a system based on site specific accessibility, as this will reflect the passenger transport services and population within easy walking and cycling distance of a development at the point at which a planning application is being considered. The parking standards applied can then be adjusted to reflect the circumstances relating to that development.

Therefore, a policy based on site accessibility with the maximum standard being 100% of those specified in PPG13 for the least accessible site, 50% for a site with moderate accessibility, and 20% for those with best accessibility would be a fair approach. However, work is still required to identify the detail of what constitutes a poor, average and excellent journey time as defined within the WMRSS Review document. The 20% threshold for the most accessible sites should also be reviewed, and consideration be given to reducing this to 10%.

The approaches based on Settlement Characteristics and Local Accessibility are too crude to be meaningful, whilst the criteria based approach appears to be too flexible, effectively maintaining the current position whereby each Local Planning Authority will identify its own standards without any consistency of approach.

It is recommended therefore that the Site Specific Accessibility approach would be the Preferred Option.

Road User Charging

RUC1: Do you agree that the existing regional policy for Demand Management should remain the same until more is known of the outcome of the TIF work and the wider implications?

RUC2: Should the existing regional policy be changed to remove the reference to local charging schemes in the more congested city centres, such as Birmingham and include reference to the TIF and potential national scheme?

Worcestershire County Council's Response endorsed by Redditch Borough Council:

Given the progress made to date in developing the Transport Innovation Fund studies within the West Midlands and Shrewsbury, it is recommended that the most appropriate way forward is to update the WMRSS policy on demand management to reflect this work. This would include removal of the specific reference to the Birmingham city centre cordon scheme, and inclusion of reference to the potential national charging scheme.

Role of Airports

A1: Do you have any comments on the suggested policy revision outlined on page 81?

A2: What surface access modal split targets should be included in the WMRSS?

A3: Do you agree with the roles described on page 82 for each airport?

A4: Is the requirement for an 'Airport Development Document' an appropriate policy to include in the WMRSS?

A5: If an 'Airport Development Document' policy is not supported, then how else can the WMRSS manage the wider impacts of airport development?

A6: Should the WMRSS include policies to deal with airport related cross-boundary planning issues?

Worcestershire County Council's Response endorsed by Redditch Borough Council:

The suggested policy revision to T11 is endorsed, although the modal share targets will need development in conjunction with the airport operators, through the master planning process. The roles outlined for each of the Region's airports appear to be satisfactory, and it is agreed that there is logic in requiring each airport to work with the relevant Local Planning Authority to produce an Airport Development Document to recognise the influence that the airport will often have upon the local area. It is agreed that there should be some consideration to cross boundary journeys given the influence that travel to other airports can have upon the transport network.

Additional Comments not addressed in any of the WMRSS Questions

Housing Demand - Demolition figures

Within Table 1, Appendix 1 (HBP), Redditch Borough Council would also query RPB data regarding the demolitions estimate of 96 dwellings between 2001 and 2026. With respect to Redditch Borough, Redditch Borough Council considers that this figure is too high. Based on past trends, Redditch Borough Council would expect to see 64 demolitions between 2001 and 2026, or, based on previous assumptions established through the Worcestershire County Council Structure Plan process would expect to see 3 demolitions per annum i.e. 75 demolitions between 2001 and 2026. As such, Redditch Borough Council would like to see calculations and methodology to either substantiate assumptions about demolitions or it suggests that the figures should be re-visited. Para 2.9 of HBP states that latest estimates of demolitions were more likely to show a decline of 15% since the 2004 survey and that updated estimates will be included as part of developing a preferred option. If a decline in demolitions is anticipated then the combination of an over-estimate in demolitions plus a decline in actual demolitions could result in inaccuracies in the amount of new land that needs to be identified for development. Although the figures are small in relation to the overall housing options, the cumulative impact of several small inaccuracies in base data across the whole Region could begin to be significant.

Housing Land and Urban Capacity

Paras 3.2 and 3.6 (HBP) state that the Regional Assembly undertook a Region wide survey of housing land and urban capacity in 2004 and that all local planning authorities were asked to provide estimates of likely future housing capacity. The summary of results of the Regional Urban Capacity Study 2004 is set out in Table 3, Appendix 1 (HBP). Redditch Borough Council strongly disagrees with the Potential Capacity figures presented for Redditch Borough. Redditch Borough Council is unclear how these figures were derived as they bear very little resemblance to the figures in its 2004 questionnaire response to the RPB. Redditch Borough Council considers that the figures in Table 3 over estimate the Total Potential Capacity (2001-2026) for Redditch Borough by approximately 2000 dwellings.

Sustainability Appraisal of the Draft Regional Spatial Strategy Phase 2 Revision for the West Midlands

The comments below relate to the following aspects of the Sustainability Appraisal for the Regional Spatial Strategy Phase II review:

1. Sustainability Appraisal of Draft Regional Spatial Strategy (RSS) Phase 2 Revision for the West Midlands - The Options Appraisal Report;
2. Annex B Detailed Appraisal Findings; and
3. The SA Audit Trail.
4. The Scoping Report.

The particular emphasis of the comments below are related specifically to Redditch Borough, however some comments will be generic to all authorities in the Region.

1. **Sustainability Appraisal of Draft Regional Spatial Strategy (RSS) Phase 2 Revision for the West Midlands - Options Appraisal Report**

MUAs

The Non-Technical Summary to this Options Appraisal Report states:

“A key objective of the RSS is to focus housing development within the Major Urban Areas. By 2021, for every ten houses constructed in MUAs, only seven should be constructed elsewhere in the Region. However, none of the three options appears to support this objective by focusing development within the Major Urban Areas.”

This sentence appears to display a conflict with the Spatial Options Document. On page 16 of the Spatial Options Document there is reference to the need to regenerate Major Urban Areas (MUAs). It is implied that this regeneration will continue to be a principle aim of the WMRSS. However the Sustainability Appraisal (SA) Report is implicit that under any of proposed Options the focus and therefore the necessary regeneration will not be achieved.

Paragraph 2.2 of the WMRSS states:

“The overall vision for the West Midlands is one of an economically successful, outward looking and adaptable Region, which is rich in culture and environment, where all people, working together, are able to meet their aspirations and needs without prejudicing the quality of life of future generations.”

In order for this Regional Vision to be realised the principle of reversing the movement of the population away from MUAs is essential to the achievement of the Governments Sustainability Objectives as set out in ‘A Better Quality of Life’ (1999). This principle of reversal as set out in paragraph 2.5 of the Regional Spatial Strategy would not being

achieved by any of the three proposed Options, therefore hindering the achievement of the regional vision.

Section 3.2 - Consultation

This section refers to the consultation already undertaken on the Scoping Reports. It is not clear from the names of the respondents and in other documentation, exactly which bodies and stakeholders have been consulted at this stage. Redditch Borough Council would like conformation of this.

Section 3.4.3 – Indicators and Targets

With reference to the indicators and targets this section states:

“Indicators and targets are included for many of the core and subsidiary objectives. This is to ensure that the appraisal is linked to quantified measures of performance wherever possible, rather than being entirely qualitative in nature.”

Out of the 103 framework questions proposed in the Sustainability Framework (in Table 3.1) 57 questions (55%) do not have a related indicator or target to measure their success. When considering that over half of the questions do not have indicators or targets, the reference to ‘many’ of them having indicators is erroneous. Without the qualifying indicators and targets measuring the achievement of the questions or objectives, these are simply meaningless statements.

When taking into account that this is the Sustainability Framework, it should follow guidance in ‘Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents’ (2005), specifically paragraphs 2.2.15 – 2.2.19 concerning Stage A4 of the Sustainability Appraisal process. It is accepted that the Sustainability Framework should consist of objectives (known as the questions in this case) and that where practicable they can be expressed as targets and measured by indicators. However it is concerning that it has not been practicable to express the objectives as targets in so many cases. Reference is also made to Appendix 9 of the guidance ‘Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents’ (2005) which provides an example of how to prepare a SA Framework appropriately, where all objectives have a related indicator or objective to measure their achievement.

Table 3.1 – Sustainability Appraisal Framework

See previous comments regarding the indicators and targets.

It is also considered that the Sustainability Framework, particularly the objectives (or questions in this case) are overly lengthy. This conflicts with guidance set out in ‘Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents’ (2005) at paragraph 2.2.18 which states:

"The number of sustainability objectives, indicators and targets needs to be manageable..."

Section 4.3.1 – Key Findings

In this key findings section concerning future employment land provision it states:

"In defining employment land requirements it is not apparent that any account has been taken of areas of deprivation or any focus of resources on areas of need. The importance of this should be recognised in the revision process and a clearer indication given of the role this plays in determining requirements."

Redditch Borough Council reiterates that it is unclear where account has been taken of the areas of deprivation or areas of need when determining employment land requirements in the Spatial Options Document. In addition, it appears that no account has been given to the need to balance the level of housing provision with the level of employment land required in the Spatial Options Document.

Section 5.2.2 – Housing Options

The following statement reads:

"For Options 2 and 3, Appendix One of the Spatial Options Document sets out the number of households which will require re-housing from demolished stock between 2001-2025 by local authority. From this it is possible to calculate the number of houses which will be demolished, by allowing for a vacancy rate of 3% that is assumed in the Spatial Options Document (i.e. for every 97 households re-housed from demolition, 100 houses would be demolished). The number of demolitions is then subtracted from the gross housing completions figure to provide a figure for net housing increase."

This statement is incorrect. Demolition and vacancy rates are independent calculations.

Section 6.2.2 – Appraisal Method

Regarding the methodology of the sustainable appraisal, this section states:

"All sections of the Spatial Options Paper have been appraised using the SA Framework, as follows...Housing Options: The effects arising from each housing option have been quantified where possible..."

Redditch Borough Council questions the depth of the appraisal methodology. No regard has been given to the probability or in Redditch Borough's case the likely inevitability of development on Green Belt land. The effects of development on the Green Belt are not quantified as part of the Sustainability Appraisal. When considering the possibility of implications of development on the Green Belt, it is felt that the appraisal is inadequate as there is likely to be a significant negative impact resulting from the Option 3 figure specifically.

Section 6.4 - Housing

The first part of this section concerns the housing element of the Spatial Options Document. There are then sub-headings covering issues such as urban renaissance; availability and affordability of housing; and land use. Redditch Borough Council considers that there is a need for discussions on the use of green belt land. Green belt should have its own specific sub-section which should detail the Local Authorities which may need to roll back green belt land in order to meet the requirements of the Spatial Options Document. Redditch Borough Council considers this is an important element of the Sustainability Appraisal of the Options, as the potential effects would be significant upon the social and environmental sustainability of Redditch Borough and adjoining Districts.

Section 6.4.3 - Land Use

When discussing the insufficient urban capacity to accommodate Option 2, it states:

"Of the 491,200 dwellings to be constructed under Option 2, 435,505 (or 88.7%) could be provided land identified in the Urban Capacity studies. Therefore, a minimum of 55,563 dwellings would be sited on land that is not included in the Urban Capacity studies, covering 1,735ha of land or 11.3% of all the land required for the proposed housing growth. This land is located in 20 of the Region's 34 local authority areas:...Redditch (78ha)..."

Redditch Borough Council can clarify that this figure is incorrect. Based on a calculation of 30 dwellings per hectare, Redditch would be short by between 130-140 Ha. This should be changed from the 78ha stated.

Similarly, when discussing Option 3 it states:

"Of the 575,000 dwellings to be constructed under Option 3, 444,170 (or 77.2%) could be provided on land identified in the Urban Capacity studies. Therefore, a minimum of 130,830 dwellings would be sited on land that is not included in the Urban Capacity studies, covering 3,543ha of land or 22.8% of all the land required for the proposed housing growth. This land is located in 27 of the Region's 34 local authority areas:...Redditch (241ha)..."

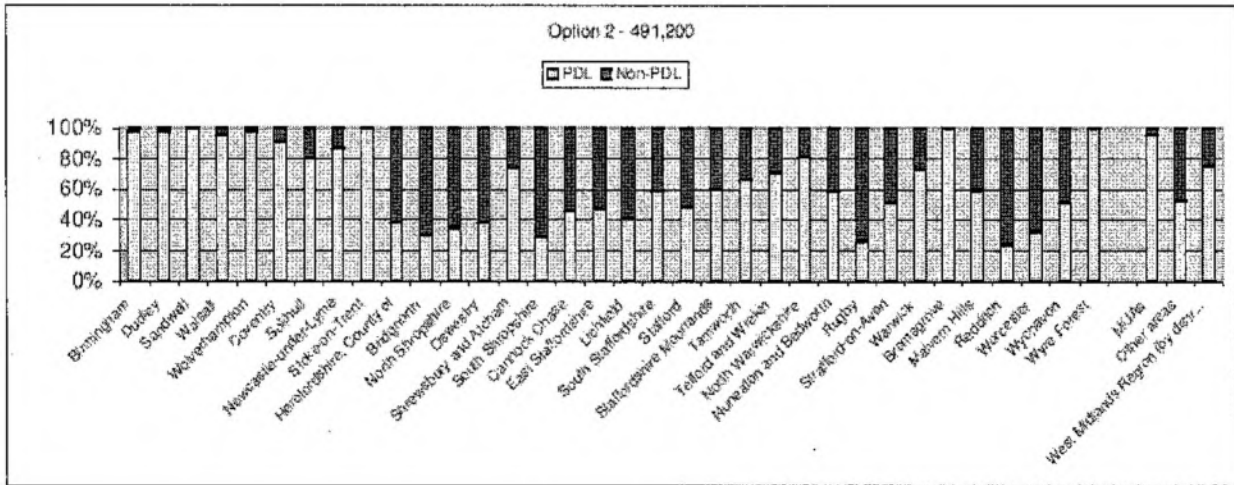
Redditch Borough Council can clarify that this figure is also incorrect. Based on a calculation of 30 dwellings per hectare, Redditch would be short by between 297-306 Ha. This should be changed from the 241ha stated.

Section 6.4.3 – Use of Previously Developed Land

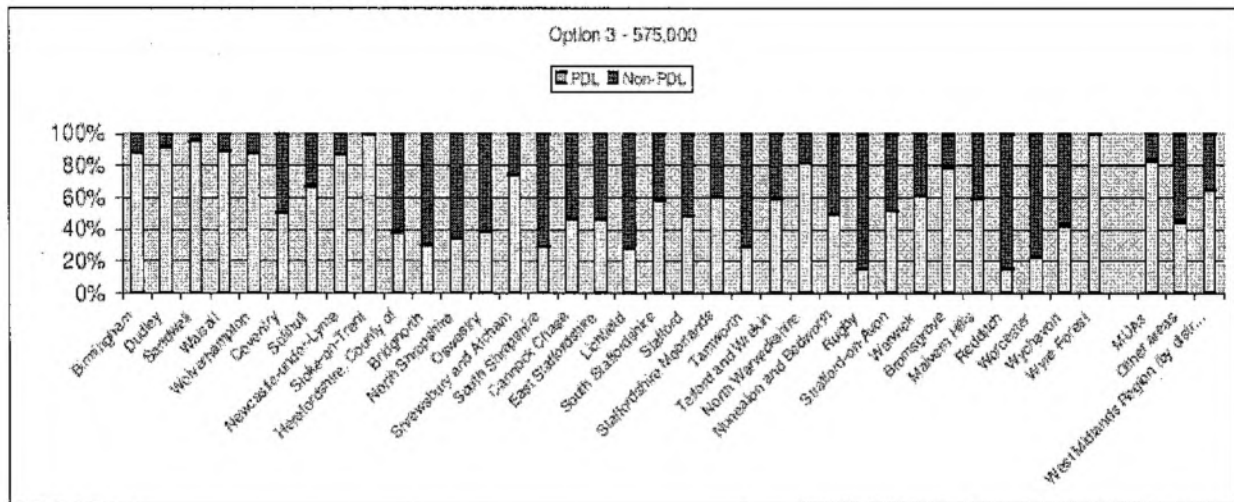
Redditch Borough Council questions the assumption that:

"all of the options can be delivered using large amounts of PDL and all would be above the PPG3 target of 60% by 2008".

In Redditch Borough's case and for other local authorities the assumption is not applicable. The rewording of this sentence should ensure that a more accurate picture of the differences in circumstances between different local authorities are shown. Redditch being a former New Town will have less Previously Developed Land available. This is confirmed and is apparent in Figure 2.6 of Appendix B – Detailed Appraisal Findings in the Options Appraisal Report. The tables detailing information for Option 2 and for Option 3 are displayed below, which illustrate the percentage of houses that could be constructed on Previously Developed Land by District:



It is clear that if Option 2 were to be selected as the preferred option, Redditch and other authorities including Rugby and Worcester have very little opportunity to accommodate development on Previously Developed Land.



The Table above illustrates the Option 3 implications of development on PDL. This table shows an even poorer percentage of development on PDL in Redditch Borough and other local authorities. It is clear that Redditch Borough Council has the weakest position of all authorities in the West Midlands in terms of the percentage of development opportunities on

PDL. This scenario emphasises Redditch Borough Council's position that the distribution of housing under Option 3 to either Worcestershire as a County or to Redditch Borough is not desirable. When looking at the other Authorities in the County e.g. Wyre Forest and Bromsgrove, these authorities have more opportunities to reuse Previously Developed Land than other local authorities in Worcestershire. This should be a consideration in the assessment of the sustainability of the distribution of housing.

Section 6.4.4 – Availability of Employment Land

Concerning the availability of employment land this section states:

“...it will be increasingly necessary to use other sources of land to provide for the higher housing growth rates. **These housing growth rates are likely to put pressure on land already allocated for employment uses, and other land which might have become available for employment uses.** It seems likely that housing and employment will have to ‘compete’ for the best sites.”

As part of the availability of employment land, there is no mention of the possible need for employment land to be located on Green Belt land. Redditch Borough Council considers this is an important element of the Sustainability Appraisal of the Options, as the potential effects of development for employment on Green Belt land would be significant upon the social and environmental sustainability of Redditch Borough and adjoining Districts.

Section 6.4.5 – Natural, Built and Historic Environmental Assets and Biodiversity Assets

This section concerns the natural, built and historic environmental assets and biodiversity assets and it states:

“The delivery of the higher growth scenarios would require the use of more greenfield sites, and are therefore more likely to impact negatively on environmental assets.”

It is possible that Green Belt land may be required in many areas including Redditch Borough in order to meet the employment and housing growth. There is no mention of this possibility in this section however. There may be significant environmental concerns if Green Belt land is developed, as well as social implications and this needs to be explored through this Sustainability Appraisal.

Table 7.1 – Overall Implications of the Spatial Options Paper against SA/RSDF Objectives

Objective 1.1

Concerning Objective 1.1, the overall implications of the Spatial Options Document column states:

"Water surpluses will be reduced, even allowing for developments in water supply infrastructure, with some areas going into deficit at different times under different scenarios."

Given the fact that areas would be going into 'deficit' it would be more appropriate for the assessment to display 'clear, strongly negative implications' (Red) rather than the 'overall implications likely to be negative' assessment (Amber).

Objectives 1.4 and 1.5

Concerning Objectives 1.4 and 1.5, the overall implications of the Spatial Options Document column states:

"All of the spatial options will result in a greater proportion of housing being located outside of the MUAs, where public transport is likely to be a more practical mode of transport for more journeys."

Redditch Borough Council is unsure how building a greater proportion of housing outside of the MUAs makes public transport more attractive or practical. Outside of the MUAs public transport is likely to be less viable.

In addition, the overall implications column states:

"By relating the provision of new employment land to the distribution of housing, the Spatial Options paper may contribute to reducing travel-to-work distances."

Within the Spatial Options document it is unclear where the balance between the housing and employment provision is proposed.

Finally, the implications state:

"By focusing new office development in town centres, the Spatial Options paper is likely to promote public transport, walking and cycling as options for commuter travel."

As an observation, there are problems in some authorities with their ability to attract businesses to rent office space within town centres. An out of centre option is more attractive (and this is reflected in their higher rental values).

The implications of the Spatial Option 2 and to a larger extent Option 3 will result in a clear negative effect on the chance to meet objectives 1.4 and 1.5. Concentrating more development within MUAs would be the only way to achieve these SA Objectives. The assumption designated as '? - mixed or unclear' is misleading. It does not differentiate between the two assumptions. These two categories should be separated so that it is clear when there are 'mixed' implications and 'unknown' implications.

Objective 1.7 and 1.8

As noted before, the '? - mixed or unclear' designation does not display the most accurate description of the likely effects of the Spatial Options Document on these two objectives. There are mixed effects predicted from the Options Document but it represents that they are unclear.

Objective 3.1

Concerning Objective 3.1, the overall implications of the Spatial Options Document column states:

- "...not all development can be located on PDL identified in the Urban Capacity studies.
- In terms of proposed housing growth, all of the options will require the use of significant quantities of non-PDL...
- An additional amount of land (between 4,654ha and 5,244ha) will be required for employment land purposes; it is unclear how much PDL would be available for this development."

Sufficient Previously Developed Land is not available in Redditch Borough, neither is there likely to be sufficient greenfield land in the urban area to accommodate Option 3. Green Belt land may represent the only opportunity to meet the Option 3 housing target and the employment land target. This leads to the assumption that there would be 'clear, strongly negative implications' (Red) rather than the unsure/mixed designation.

Objective 3.4

Concerning Objective 3.4, the overall implications of the Spatial Options Document column states:

"Obviously, however, there will be instances where PDL is not available for development, and it is certain that greenfield sites will be used for some developments. Furthermore, some county and unitary authority-level targets for PDL use (as set out in the RSS) will not be achieved."

Redditch Borough Council is unclear how a likely positive assessment (green) has been made when considering the fact that Previously Developed Land is not available in some areas and that greenfield sites are likely to be required for development.

Objective 3.5

Concerning Objective 3.5, the overall implications of the Spatial Options Document column states:

"it is unclear whether the levels of development proposed could be delivered in a way that supports the objective."

From Redditch Borough's perspective, it is likely that new build development outside of the Borough boundary on Green Belt land would have a negative impact on the achievement of this SA Objective, and this is a possibility under Option 3 specifically. The assessment should be that the 'overall implications likely to be negative' (Amber).

Objective 4.2

Concerning Objective 4.2, the overall implications of the Spatial Options Document column states:

"The distribution of houses in the Spatial Options Document would weaken efforts to concentrate households in MUAs...however, other proposals in the document would promote access, including the location of employment land, which would be focused areas near housing..."

As stated previously Redditch Borough Council considers that no balance between employment required and housing figures has been established in the Spatial Options Document? The assessment concluding that '? - mixed or unclear' (White) designation is more appropriate, is again confusing. It should be better represented as a mixed implication but it is portrayed as unsure because of the choice of symbolism.

Objective 4.8

The actual objective is:

"Encourage physical development with a better balance of jobs, housing, social and cultural services and amenities within each part of the Region in order to meet local needs locally and encourage stable and sustainable communities"

Concerning Objective 1.1, the overall implications of the Spatial Options Document column states:

"In broad terms, the Spatial Options Document aims to develop a less dispersed pattern of development across the Region, with housing, employment land, office space and other aspects of regional development being focused around MUAs and Sub-Regional Foci (although all of the housing options would slightly reduce the overall proportion of households in the MUAs)."

Redditch Borough Council disagrees with the assessment of a likely positive effect (Green) as a result of these implications on the objective. There is likely to be a negative impact on the SA Objective and a more fitting assessment would be that the 'overall implications likely to be negative' (Amber). The physical development proposed by the Spatial Options Document has no correlation between jobs, housing, services and amenities. The Options Document (specifically under Option 3) does not therefore encourage stable and sustainable communities.

2. Annex B – Detailed Appraisal Findings

Sustainability Appraisal of housing options, from Spatial Options Paper

Appraisal Question 1.1

Redditch Borough Council is unclear why the effects of the Spatial Options on promoting the balance of water supply and demand will be a temporary effect. There is no information to conclude that these effects will be temporary. Despite the planned resource developments, deficits are still likely at the end of the plan period as predicted in the commentary column.

Appraisal Question 3.1

Under the Permanent/Temporary column the designation of "H" does not display whether the effects are likely to be permanent or temporary.

In the commentary column the reference to Redditch under Option 2 being short of 78Ha is incorrect. Redditch Borough Council can clarify that based on a calculation of 30 dwellings per hectare; Redditch would be short by between 130-140 Ha. This should be changed from the 78ha stated.

Similarly, when discussing Option 3 in the commentary column, Redditch is identified as being short of 241ha of land which is also incorrect. Redditch Borough Council can clarify that based on a calculation of 30 dwellings per hectare; Redditch would be short by between 297-306 Ha. This should be changed from the 241ha stated.

Appraisal Question 3.2

Once development takes place, the opportunity to enhance biodiversity would be lost. This therefore means that the effects would be permanent and not temporary as suggested. PPS9 not only concerns the maintenance of biodiversity, but also opportunities to enhance biodiversity should be taken. PPS9 states that:

"Plan policies and planning decisions should aim to maintain, and enhance, restore or add to biodiversity and geological conservation interests."

Appraisal Question 3.2

When considering the effects on the objective to prevent noise and light pollution it is unclear why the effects resulting from the Spatial Options Document have been predicted to be temporary. The commentary column states:

"Noise and light pollution is, in broad terms, likely to increase as a direct result of housing and population growth. Therefore the higher growth options are likely to have greater impacts on these issues."

It is unclear how development which would increase noise and especially light pollution would not be a permanent effect.

Appraisal Question 4.2

The commentary column describes a mixed situation:

“Provision of additional housing may result in improved or worsened access to services, facilities and opportunities...the areas with higher growth rates may result in improved access to facilities and opportunities. With the lower housing growth rates of Option 1 compared to those in Options 2 and 3, housing/population growth may not support the development of new services and other opportunities in areas such as Worcester, Coventry, Redditch where housing/population growth will be limited.

When considering these predicted mixed effects it would be more appropriate for the Options to be a mixed (White) situation depending on the levels of infrastructure achievable.

Section 3: Sustainability Appraisal of Sections on ‘Future Employment Land Requirements’ and ‘Protection of Employment Land’. from Spatial Options Paper

RSDF 1.5

The commentary column states:

“Options paper addresses importance of estimating future employment land needs based on household projections for local authority areas. This should help to provide employment land which reduces the need to travel.”

As stated previously, it is not clear where the employment land provision has any relevance to the household projections in the Spatial Options Document.

RSDF 3.1

Regarding the objective to value, protect, enhance and restore the Region’s environmental assets, including the natural, built and historic environment and landscape, the accompanying commentary states:

“Providing land for new economic development could result in loss of greenfield land”

Despite the aspirations of Policy PA.6 of the Regional Spatial Strategy, large scale development on greenfield land is likely to be required. With reference to the charts at Figure 6.2 of Annex B it is clear that Redditch Borough will have the least amount of Previously Developed Land to utilise for development in comparison with any other authority in the West Midlands. The majority of land allocated to meet the requirements for housing and employment is likely to be greenfield and some possible development of Green Belt. It is Redditch Borough Council’s view that the predicted effects resulting from the Options should be ‘Major negative effect’ (Red) and the effects will be felt in the medium to long term. Also within the appraisal and the commentary column there is no mention of the possibility of

development on Green Belt land. The appraisal therefore has not explored all of the likely significant effects resulting from the Spatial Options Document.

With reference to the objective to value, enhance and protect the Region's natural environmental assets (e.g. Green Belt, parks and open spaces, AONBs etc) the commentary states:

“Providing land for new economic development could result in loss of greenfield land to development which may have a value as open space, although Policy PA6 envisages maximum use of recycled land and allows development on greenfield sites only as a last resort.

Considering this Objective includes the aim to protect Green Belts, it is unusual that there is no mention of Green Belts in the commentary. In relation to the remaining three objectives under RSDF 3.1 see above comments relating to the inclusion of Green Belt discussions. All of these assessments should conclude that likely negative effects are predicted (Red) rather than the Amber.

RSDF 3.4

See above comments on the inclusion of Green Belt discussions and reclassification of the effects to 'likely negative effects'.

RSDF 4.2 and 4.8 and 4.9

See previous comments regarding the need for a balance between employment and housing.

3. Sustainability Appraisal Audit Trail - Changes to Spatial Options (Post SA)

There is a SA mitigation on page 3, second row stating:

“The options paper would be improved by clarification of the expected impact of the different options for approaches to out-of-centre provision on the balance of provision in or out of town centres.”

The suggested change has been noted as:

“No change proposed as the impact must await individual local assessments of centre capacity.”

Redditch Borough Council seeks clarification of what the requirements of Local Authorities are as a result of this statement?

4. The Scoping Report

PPS3

It is of great concern to Redditch Borough Council that the Scoping Report as a part of the Sustainability Appraisal to the Phase II revisions to the West Midlands Regional Spatial Strategy has not considered the implications of Planning Policy Statement 3 on Housing.

The response in Table 7.1 'Consultation Feedback and Response' in the Scoping Report stating "PPS3 on Housing is still a draft policy, and the Scoping Report is only covering policies which have been approved" is questioned as PPS 3 was issued in November 2006 (to be implemented in April 2007). The Scoping Reports are entitled to be altered and amended up until the release of the Sustainability Appraisal for consultation in January 2007. The Sustainability Appraisal is intended to be an iterative process taking account of policy changes or baseline changes etc. Paragraph 1.9 of Government Guidance on the preparation of Sustainability Appraisals 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) states:

"RPBs and LPAs must have regard to the Secretary of State's policies and guidance in preparing RSS revisions, DPDs and SPDs...It is desirable for SAs to include information on the significant sustainability effects of implementing national policies."

Paragraph 2.36 of Planning Policy Statement 11 – Regional Spatial Strategies states:

"...The more continuous and proactive engagement of the community in the process of preparing a draft revision means that the SA evidence and analysis needs to be correspondingly kept up-to-date and publicly available throughout the process as well."

The RPB should be taking account of all relationships between the Phase II revision and other relevant plans, policies and programmes. Further refinement of the Stage A Scoping Reports are permitted and they will be necessary in order to take into account the sustainability implications of PPS3. Paragraph 2.2.5 of 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) states:

"The RPB will need to keep these relationships under review as it prepares both the current and future RSS revisions."

It is not for Redditch Borough Council to comment on the implications of PPS3 however, it is likely that there will be significant impacts on the key issues and problems and other PPS3 objectives which will need to be considered as part of the RSS Phase II review.

Objectives, Targets and Indicators

In the Scoping Report at Section 7.1, consultation feedback and responses are provided. Redditch Borough Council wishes to pick up on some of the comments received and the responses made by the RPB.

On page 73 in Table 7.1 of the Scoping Report a response from Taylor Woodrow states:

"We would query what is being done about the incompatible Sustainability Appraisal Objectives in Table 6.1 (growth and housing when compared with several of the other objectives)? The Sustainability Appraisal Scoping Report does not make it clear how these are being treated / amended once they were highlighted as being potentially incompatible"

The response to this comment suggests that the conflicts between objectives do not need to be considered because it would change RSDf Objectives. However paragraph 2.3.4 of the Government guidance 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents' (2005) states:

"It is important for the objectives of the RSS revision to be in accordance with sustainability principles. The objectives should be tested for compatibility with the SA Objectives. This will help in refining the RSS revision objectives as well as in identifying options. The RSS revision objectives also need to be consistent with each other, and the SA Objectives will be one way of checking for this. Where there is conflict between objectives, **the RPB will need to reach a decision on priorities.**"

The emphasis on the RPB reaching a decision on priorities is important because it is not clear if or where this has been done in the Sustainability Appraisal. It would not be appropriate to identify that conflicts between objectives exist without any commentary or suggestions of how to amend them.

Also there is a comment again from Taylor Woodrow which states:

"We note that many of the Appraisal Questions do not have an Indicator and / or target associated with them. Indicators and targets are important in helping to increase levels of sustainability. These indicators and targets will also be useful when undertaking local level Sustainability Appraisals, and therefore should be as comprehensive as possible"

The response recognises the need for indicators however the RPB response that these have been included 'where possible' does not display that the RPB is striving for sustainability in the RSS revision.

In conclusion, Redditch Borough Council considers the RPB's SA of the WMRSS Phase 2 Revision to be inadequate for the purposes for which it was produced. This document, along with other background documents mentioned in Redditch Borough Council's response appear to provide very little robust evidence or supporting statements to underpin this Review. Therefore, Redditch Borough Council can only come to the conclusion that the Phase 2 Spatial Options document is undermined and additional work should be carried out to strengthen its viability before a Preferred Option is progressed.