

West Midlands Regional Spatial Strategy
Phase Two Revision – Spatial Options
Analysis and Review of Consultation Responses, May 2007

**Addendum to the report to reflect the consultation response received from
Redditch Borough Council (Respondent No 1142)**

Background

Redditch Borough Council has expressed concerns that elements of Redditch Borough Council's response to the Spatial Options consultation had not been summarised as thoroughly as others in the consultation analysis report and that some summaries appeared to have missed out relevant points.

The following steps have been taken to address this issue and to ensure that Redditch Borough Council's response is properly taken into account in the process of developing the Preferred Option alongside all other consultation responses:-

1. The WMRA Secretariat asked Consensus Planning Ltd., the consultants who prepared the consultation analysis report, to consider the points raised by Redditch Borough Council and to advise the WMRA Secretariat as to whether any amendments to the consultation report were required.
2. In those cases, in which Consensus Planning Ltd. accepted identified shortfalls, the consultation report has been amended and, in addition, this addendum has been prepared to show the amendments which have been made.
3. The addendum and Redditch Borough Council's full response have been forwarded to the RSS Policy Leads who have been asked to take these documents into account in the process of developing the Preferred Option together with the consultation report and other relevant considerations.
4. The addendum has been forwarded to Redditch Borough Council for information.
5. The revised consultation report and the addendum have been made available on the WMRA website.
6. The WMRA Regional Planning Partnership has been informed about the addendum to the consultation report.

Please note that this addendum only covers Redditch Borough Council's response to the consultation questions where amendments have been made in the consultation report. The addendum should therefore be read in conjunction with the full consultation report.

Analysis of the response

Housing

Question H4-1

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. 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.

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. 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.

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.

Question H6

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

1. Districts that volunteered for more housing should have proportionately higher targets.

2. Housing targets should reflect the ability of a district to accommodate its target.
3. The balance of proposals should reflect WMRSS objectives (e.g. with regard to urban renaissance).
4. All natural growth should be met where it arises unless it can be demonstrated that this is not deliverable.
5. Rationale for proposals beyond natural growth requirements should be clear.
6. The overall balance of proposals should be under-pinned by robust data.
7. Comparable settlements, in policy terms, should receive similar proportions of new development.

1. Districts that volunteered for more housing should have proportionally higher targets.

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.

2. Housing targets should reflect the ability of a district to accommodate its target.

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. 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. Redditch Borough Council Officers have pointed out that the 4(4) advice that relates to Redditch Borough Council is an over-estimate of capacity.

3. 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 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. Redditch Borough Council considers the WMRSS and its supporting documentation to be in conflict with each other on this occasion. 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 from the conurbation in the Redditch housing projection 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.

4. All natural growth should be met where it arises unless it can be demonstrated that this is not deliverable.

Redditch Borough Council queries why neither Kidderminster or Bromsgrove have been allocated enough dwellings to meet their own natural growth under option 2. The option 2 allocation for Redditch Borough is disproportionate to those allocations for Bromsgrove and Wyre Forest. 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. 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.

5. 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 undeliverable, 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.

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. Redditch Borough Council is concerned about development potential assumptions at Redditch Borough Council without robust evidence from a development potential study. 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. 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.

6. The overall balance of proposals should be under-pinned by robust data.

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. 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.

ECOTEC report (Identification of LHMA's)

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

Redditch agrees 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 considers that Census Ward boundaries can also fail to coincide with areas recognised by the market. Redditch Borough Council considers it wholly inappropriate to use such 'anecdotes' in analysis of a report which underpins the development of the WMRSS revision. Redditch Borough Council suggests that ECOTEC failed to use and analyse local based knowledge from important sources such as estate agents.

7. Comparable settlements, in policy terms, should receive similar proportions of new development

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%. 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. Redditch Borough Council 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. It is crucial, for all districts, that the overall balance of housing proposals for each of the Options is under-pinned by robust data.

Question H14

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.

Question H15

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.

Employment

Question E2

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. 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.

Question E7h

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 would therefore retain an undeveloped site until they are able to attempt to secure a change of use.

Question E8

Housing and Employment targets should be 'in balance.'

Housing and employment targets should be in balance to achieve sustainable development. We 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 achievable 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.

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 Ravens bank within the administrative area of Bromsgrove District Council.

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. 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.

Centres

Question SC5

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 leisure time closer to where they live.