

**Redditch Borough Council**

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**Bromsgrove District Council Issues and Options Consultation**

Thank you for the opportunity to comment on your Issues and Options consultation documents. Please accept this response as an Officer Response from Redditch Borough Council (RBC). Members of RBC will be invited to endorse this response at its Executive Committee meeting on 11<sup>th</sup> December 2018 and Council on 28<sup>th</sup> January 2019. I will provide you with an update at this juncture.

RBC wishes to limit its response to strategic matters that relate to Redditch Borough.

**Q. SI 10: Which combination of the above options do you feel are the most appropriate and sustainable to meet the District's future needs and why?**

RBC's concerns relate specifically to *Strategic Issue 4: Broad options for development distribution and allocating land uses – Option 6: Focus development on the edge of Redditch and Option 8: Reconsideration of existing unconsented allocations on the boundary with Redditch Borough Council*. Should either of these options be chosen alone or as part of a wider distribution development strategy, RBC raises the following:

*Option 6: Focus development on the edge of Redditch*

Should sites be proposed adjacent to Redditch Town, RBC requests the opportunity to discuss existing nearby facilities and services which would be within Redditch Borough and be used by future residents of these site(s). Regardless of whether allocations are at a scale to require certain facilities and services, it is likely that future residents would travel to Redditch Town centre and local centres to use facilities and services due to their proximity to the Town. It is therefore important that RBC as well as facility and service providers within RBC are involved in the site selection, allocation and policy formation process to ensure a cohesion and integration of any proposed allocation sites with Redditch Town.

*Option 8: Reconsideration of existing unconsented allocations on the boundary with Redditch Borough Council*

There are two existing cross-boundary housing sites (Brockhill and Foxlydiate) and one employment development site (part of Eastern gateway) in the Bromsgrove District Local Plan 2011-2030 on the edge of Redditch. Within the Bromsgrove administrative area Brockhill provides 600 dwellings for Redditch Borough and the Foxlydiate site provides 2,800 dwellings. All of the 3,400 dwellings on these two sites are for Redditch's housing need. It was due to Redditch Town being constrained by its administrative boundaries which led to these allocations.

Central government is seeking to maintain its aspiration of 300,000 dwellings per annum being built. The standard method for assessing housing need, which was released in July 2018, is currently under review with proposed changes and clarifications are out for consultation. The numbers within the Issues and Options document use the 2016-based

data as per the initial standard method, while the consultation on changes to planning policy and guidance including the standard method for assessing housing need specifies that the 2014-based data should now be used. But even irrespective of this, in the longer term the formula for the standard method will be reviewed and a new method expected by the time the next projections are issued.

Due to these circumstances, the housing need for RBC is unclear. It cannot, therefore, be assumed that the two cross-boundary housing allocation sites are not required for Redditch to meet its housing need. These sites should be retained for Redditch's housing need until 2030 as per the current plan. In addition it is pointed out that Redditch will have housing needs beyond 2030 and it is important for the Bromsgrove Plan Review to have regard to this matter.

As an aside, BDCs local housing need within the Issues and Options document, for all the plan period options, exceeds the quantity of dwellings within the allocated cross-boundary sites at Foxlydiate and Brockhill. Therefore as part of the Local Plan Review, BDC would still need to undertake a Green Belt Assessment and propose suitable and sustainable sites to remove from the Green Belt and allocate for development regardless of whether Foxlydiate and Brockhill numbers went towards Bromsgrove's housing need. It is anticipated that this process will identify sites that are more suitable from a sustainability perspective for Bromsgrove needs than sites contiguous to Redditch town.

Once the broad options for development distribution are chosen RBC will need to understand and comment on any issues which may impact RBC.

I trust that you find these comments constructive and help towards coming to conclusions regarding the Issues and Options. The Bromsgrove Local Plan Review is clearly a process that will take some time and will therefore be undertaken in the coming years. RBC is of course entirely willing to work with you to ensure that the Local Plan Review is soundly prepared and provides a co-ordinated approach to growth within Bromsgrove District without compromising the needs and issues for Redditch Borough.