



Executive Committee

No specific ward relevance

31st March 2010

OUTCOME OF PREFERRED DRAFT CORE STRATEGY

(Report of the Acting Head of Planning and Building Control)

1. Summary of Proposals

The report seeks the endorsement of the Officer responses to the Preferred Draft Core Strategy consultation (Appendix A)

2. Recommendations

The Committee is asked to RESOLVE that

the Officer responses to the Preferred Draft Core Strategy consultation be approved.

3. Financial, Legal, Policy, Risk and Sustainability Implications

Financial

- 3.1 The costs associated with this publication have been met from existing budgets.

Legal

- 3.2 Redditch Borough Council is required, under the Planning and Compulsory Purchase Act 2004, to produce a Core Strategy. On the 27th June 2008 the Town and Country Planning Amendment Regulations came into force, which removed the need to undertake a Preferred Options stage in the Core Strategy production (previous regulation 26). Under the transitional arrangements supplied by the Department for Communities and Local Government, the current (amendment) requirement is to ensure that public participation in the preparation of a DPD is undertaken in accordance with the new Regulation 25. To fulfil these requirements, a Preferred Draft Core Strategy was produced. Consultation was undertaken from 31st October 2008 to 8th May 2009. It is necessary for Officers to consider any comments received and decide on an appropriate course of action.

Policy

- 3.3 The Core Strategy Development Plan Document (DPD) will eventually replace many policies within the Borough of Redditch Local Plan No.3. It will be the first DPD to be produced as part of

Redditch Borough's Local Development Framework (LDF) and forms part of the development plan for area.

Risk

- 3.4 If the Officer responses to the Preferred Draft Core Strategy is not approved, this will have an affect on the other stages of Core Strategy production, which may result in the adoption date not being met. This has the risk of planning decisions being made on their individual merits without the benefit of a comprehensive overview of the Borough and its longer term and spatial planning needs being appreciated. Furthermore, the reward of Housing and Planning Delivery Grant may not be fully secured.

Sustainability / Environmental

- 3.5 Sustainability and environmental issues were considered by Officers when assessing any comments received to the consultation, and also any actions Officers proposed as part of the consultation.

Report

4. Background

- 4.1 The publication of the Preferred Draft Core Strategy is a significant step in the preparation of the Core Strategy DPD.

Core Strategy Preparation

- 4.2 The LDF is a folder of documents that aims to deliver the spatial portrait for the administrative area, it is made up of Local Development Documents. The Core Strategy constitutes a fundamental document within the LDF. The purpose of the Core Strategy is to outline the vision, objectives and key policies that will guide Redditch Borough's development until 2026. The Core Strategy will reflect national planning policy and Redditch's allocated role in the West Midlands Regional Spatial Strategy. Furthermore, the Core Strategy will reflect local information about the matters that are important for the Borough.

Preferred Draft Core Strategy

- 4.3 The Preferred Draft Core Strategy was the draft version of the Borough Council's forthcoming Core Strategy Development Plan Document.

5. Key Issues

- 5.1 The Preferred Draft Core Strategy was on consultation from the 31st October 2008 to 8th May 2009. In total 199 representations were received. Each representation was logged by Development Plans and allocated to an Officer who assessed the representation and considered whether an action was required. If an action was required this either encompasses a change in policy, further consultation with the individual/company who submitted the representation or passing the representation to a more appropriate department if the representation is not related to planning. The representations were divided into the following sections:
- a) Analysis of Green Belt and Areas of Development Restraint
 - b) Attractive Facilities
 - c) Balance between housing and employment
 - d) Climate change and sustainability
 - e) Cross Boundary
 - f) Delivery Strategy
 - g) Design and Safety
 - h) Development Strategy
 - i) Enterprise and Skills
 - j) Historic Environment
 - k) Infrastructure
 - l) Landscape, open space, nature, pollution, Green Belt
 - m) Miscellaneous
 - n) Open Space Needs Assessment
 - o) Policy SP.3
 - p) Procedural
 - q) Retail
 - r) Strategic Housing Land Availability Assessment
 - s) Sustainability Appraisal
 - t) Sustainable Developments Strategy
 - u) Sustainable Transport
 - v) Vision and Objectives
 - w) Waste
 - x) Water and Flooding
 - y) Winyates Green Triangle
- 5.2 At examination, the Council will need to show how the most appropriate Core Strategy has been selected. Part of this process is the consideration of representation following public consultation.
- 5.3 Perhaps the most pertinent key issue raised by respondents is how the Borough Council would have preferred to deal with its development requirements cross boundary. At the time of drafting

the Preferred Draft Core Strategy, the Borough Council had evidence in the form of the White Young Green Second Stage Report on the growth implications of Redditch and pursued its conclusions as the Borough Council's preferred approach. The conclusions of this jointly commissioned study also formed the basis of the evidence the Borough Council used in support of its argument to the West Midlands Regional Spatial Strategy Panel of Inspectors that the development requirements should be in the region of 2,400 dwellings within the Borough boundary.

- 5.4 Objections were received which disagreed with the findings of the White Young Green Study and therefore the Borough Council's approach. Objectors also noted that the Borough Council would not be meeting the development requirements which were set by the then Preferred Option Regional Spatial Strategy. There were also many respondents, mostly residents of nearby Areas of Development Restraint, who supported the specific Bordesley Park allocation in Bromsgrove District in preference to development of the Area of Development Restraint.
- 5.5 Due to the ongoing discussion between Redditch Borough Council and Bromsgrove District Council, the Officers response to these objections and support refers to the need for the joint consultation which is due to end on 22nd March 2010, which will give information on which option or combination of options across the boundary would be more preferable for both Councils. Similarly comments were received on the Area of Development Restraint within Redditch, where residents mostly opposed their use, and developers on the sites indicated that they should be more preferable.
- 5.6 There are a number of suggested changes to the Vision and Objectives in the Core Strategy as a consequence of comments received. All comments on the Vision and Objectives were received from Stakeholders who requested greater clarity.
- 5.7 Climate change matters received many comments, mostly questioning the approach the Borough Council have taken, which was to reiterate the related targets that were set out in the West Midlands Regional Spatial Strategy Preferred Option Document. It is not incumbent upon a Core Strategy to simply repeat provisions set out in either National or Regional policy, therefore Officers suggest that this policy is reviewed. Changes to the West Midlands Regional Spatial Strategy policy were detailed in the Panel Report (September 2009) therefore Officers will need to compile further technical evidence in support of a revised policy.
- 5.8 Comments were received on the Preferred Draft Core Strategy Flood Risk and Water Management Policy seeking additions and

amendments. Officer's response to these comments refers to recent advice given at a Planning Inspectorate Frontloading Meeting (8/2/2010) from the Planning Inspectorate, who advised that the flooding experienced in Redditch is not a significant issue. If the policies in the Core Strategy are not focussed on locally distinctive issues then the need for the policies is questioned. In addition, the policy as presented in the Preferred Draft Core Strategy reiterated national planning policy in PPS25. Officers suggest that this policy is deleted, and that following this advice from the Planning Inspectorate, that all policies are reviewed to determine where there may be unnecessary repetition.

- 5.9 The way in which the Borough Council projected to develop i.e. the development strategy, received some comments. There were comments questioning the use of windfall sites to contribute towards the development targets. In discussion with the SHLAA Working Partnership it is recommended that a windfall allowance should be excluded from the first 10 years of the Plan to ensure robustness and conformity with PPS3 and this will be reflected in the April 2010 Strategic Housing Land Availability Assessment refresh. Officers also recommend that the approach to windfalls be drafted into the policy. Another comment on the development strategy requested allowance for the timely release of land for affordable housing development to come forward in Green Belt locations. Officers suggest that the level of development likely to be required on land currently designated as Green Belt will need to be phased sooner in the plan period to enable development to continue to come forward in a satisfactory manner without compromise to development in Redditch's urban area. This should be addressed through a revision to Policy SP.2.
- 5.10 With regards to affordable housing, objections were received to the 40% affordable housing requirement for residential development on the basis that it was too high, making developments unviable and endangering the ability of the Council to deliver regional targets, particularly relevant in the current economic climate. Officer's response to this is that the provision of 40% affordable housing requirement has been established through the findings of the 'Strategic Housing Market Assessment for the South Housing Market Area of the West Midlands Region' (April 2007). Officers recommend that further investigation of the viability of alternative affordable housing provision is undertaken including a sliding scale of financial contributions and lower levels of on-site provision should a threshold of 40% prove too constraining. A refresh to the Housing Needs Assessment can be commissioned shortly to evidence this further.

- 5.11 Comments have been received questioning how the Town Centre requirements can be accommodated – i.e. retail and office as set out in the West Midlands Regional Spatial Strategy. The office needs assessment proposes a revised office requirement of 30,000 sq.m, of which the Town Centre can accommodate 22,000 sq.m consequently Officers suggest that policy will need to reflect the findings of this study.
- 5.12 Land to the Rear of the Alexandra Hospital received some comments generally either in support of its use and some objecting to its use. In order to be compliant with the West Midlands Regional Spatial Strategy a maximum of 5000sq.m of B1 use can be provided at this location, also in light of higher housing targets in the West Midlands Regional Spatial Strategy Panel Report (Sep 2009) Officers suggest a change to this policy to reconsider this strategic site for mixed use development of employment and residential.
- 5.13 The Government Office for the West Midlands in its response to the Preferred Draft Core Strategy, noted concerns regarding the style and presentation of the individual policies and the overall content of the Core Strategy. In order to respond to these criticisms Officers revised the suggested layout to the Core Strategy and presented a re-drafted version in July 2009. The changes to the layout were significant, including removing the Local Area Agreement Themes as the chapters to the policies. Officers grouped what was aiming to be achieved into a number of suggested Key Strategy Areas including:
- 1) Green Strategy
 - 2) Design and Safety
 - 3) Development Strategy
 - 4) Sustainable Settlements
 - 5) Cross Boundary
 - 6) Balance between Housing and Employment
 - 7) Enterprise and Skills
 - 8) Retail and Town Centre
 - 9) Historic Environment
 - 10) Attractive Facilities
 - 11) Infrastructure
- 5.14 Government Office for the West Midlands indicated that the proposed revised layout satisfied the general requirements of the Core Strategy, and that work needed to continue to ensure that the content of the Core Strategy meets the requirements of PPS12 Local Spatial Planning. Officers will continue to liaise with Government Office for the West Midlands on this matter.

- 5.15 Other minor changes to wording of policies presented in the Preferred Draft Core Strategy were suggested for a number of other policies, all of which are detailed in Appendix A.
- 5.16 In addition to responses to the actual Preferred Draft Core Strategy, the Borough Council received a number of comments to the Strategic Housing Land Availability Assessment 2009. Mostly these comments were objections to the inclusion of specific sites; however some comments from developers focussed upon the methodology used as part of the assessment. Since the consultation period, Officers have addressed these concerns and have established a Strategic Housing Land Availability Assessment working partnership to further improve the content of the Strategic Housing Land Availability Assessment, whose members include industry experts and developers.
- 5.17 Overall the responses received have assisted in the development of the Core Strategy, and therefore the process of consultation in respect of the Preferred Draft Core Strategy was considered a successful process.

6. Other Implications

- Asset Management - The Land and Property holdings are affected by the contents of this report no differently than any other land and property holdings.
- Community Safety - 'Communities that are safe and feel safe' is an aim of the Local Area Agreement. All Local Area Agreement aims have been considered in the formation of the Preferred Draft Core Strategy.
- Human Resources - The Core Strategy contains policies to help create mixed and inclusive communities.
- Social Exclusion - The Core Strategy is accompanied by a Sustainability Appraisal.

7. Lessons Learnt

Not applicable.

8. Background Papers

Preferred Draft Core Strategy

9. **Consultation**

Consultation on the Officer responses has been undertaken with relevant Redditch Borough Council Officers and external bodies where appropriate.

10. **Author of Report**

The author of this report is Emma Baker (Acting Development Plans Manager), who can be contacted on extension 3034 (email: emma.baker@redditchbc.gov.uk) for more information

11. **Appendices**

Appendix A – Officer responses to Preferred Draft Core Strategy.