



Bromsgrove District Plan 2011-2030

Statement of Compliance with Duty to Co-operate

March 2014



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Introduction

1.1 The Localism Act received Royal Assent on 15 November 2011. It aims to shift power from central government back into the hands of individuals, communities and councils. The Localism Act introduces a 'duty to co-operate'. That requires local authorities to work with neighbouring authorities and other prescribed bodies to maximise the effectiveness of the preparation of their development plan documents and supporting activities so far as it relates to a strategic matter. Section 110 of the Localism Act inserts a new Section 33A into the Planning and Compulsory Purchase Act 2004.

1.2 The impact of the Duty to Co-operate is to introduce a new way of working into local government and its partners. It requires councils and public bodies to engage constructively, actively and on an ongoing basis in relation to planning of sustainable development. It also requires councils to consider whether to enter into agreements on joint approaches or prepare joint local plans (if an LPA). It applies to planning for strategic matters in relation to the preparation of local and Marine Plans, and other activities that prepare the way for these activities.

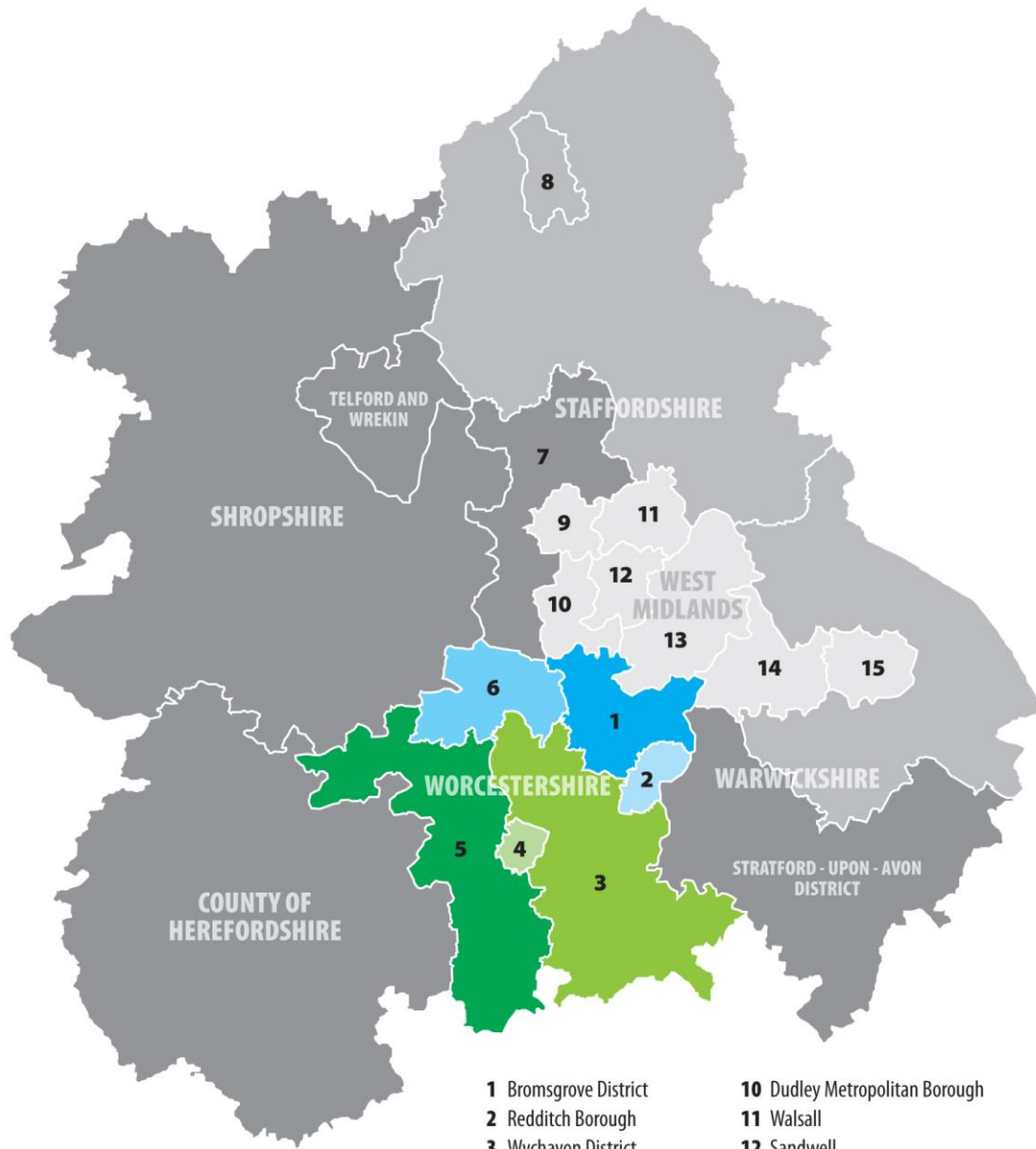
1.3 Local authorities neighbouring Bromsgrove District Council are identified in Map 1 below.

1.4 The prescribed bodies are defined in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Those relevant to Bromsgrove District are:

- Environment Agency
- English Heritage;
- Natural England;
- Highways Agency;
- Homes and Communities Agency;
- Primary Care Trust;
- Office of Rail Regulation;
- Highway Authority.

1.5 In respect of other bodies Local Enterprise Partnerships (LEPs) have been identified in the regulations as bodies that those covered by duty 'should have regard to' when preparing local plans and other related activities. A similar status is also now enjoyed by Local Nature Partnerships and Utility Companies.

Map 1



- | | |
|---------------------------------------|---|
| 1 Bromsgrove District | 10 Dudley Metropolitan Borough |
| 2 Redditch Borough | 11 Walsall |
| 3 Wychavon District | 12 Sandwell |
| 4 Worcester City | 13 Birmingham City |
| 5 Malvern Hills District | 14 Solihull Metropolitan Borough |
| 6 Wyre Forest District | 15 Coventry City |
| 7 South Staffordshire District | |
| 8 City of Stoke-on-Trent | |
| 9 Wolverhampton City | |

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1.6 Relevant planning policy issues to be considered under the duty to cooperate are also explained in National Planning Policy Framework (paragraphs 178 -181 and 156). Specifically it states "... the Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities" (paragraph 178). Co-operation should be a continuous process of engagement from initial thinking through to implementation and should consider cross boundary issues such as:

- homes and jobs needed in a geographical area;
- infrastructure projects;
- retail, leisure and other commercial developments;
- social infrastructure;
- climate change mitigation and adaptation (e.g. flood risk);
- landscape and the natural and historic environment.
-

1.7 The outcome of the Duty to Co-operate is intended to enable the promotion of culture change and enhance the spirit of partnership working on strategic cross-boundary issues so that development requirements are more likely to be met. Significant potential benefits of Duty to Co-operate that might accrue include:

- it should act as a strong driver to change the behaviour of local authorities so that strategic leadership is strengthened;
- through the spirit of co-operation, greater potential access to the resources of other stakeholders can be achieved and by working alongside incentives (e.g. New Homes Bonus), the Duty is intended to increase the effectiveness of plans thereby giving confidence to funders and investors;
- through greater co-operation, help to reduce the costs of plan preparation through the sharing of the preparation of evidence and staff time and expertise. Further information on the duty to co-operate is outlined in a note published by the Planning Advisory Service available on its website.

2. Co-operation in the preparation of the Bromsgrove District Plan

2.1 The District Council has a 'Duty to Co-operate', which is a legal requirement set out in the Localism Act. As a result the Council has been working with neighbouring authorities to determine the key cross boundary issues that need to be addressed by the emerging local plan and to ensure that a coherent approach is prepared. The Inspector who will examine the local plan will check whether it has been prepared in accordance with the duty to co-operate. To do this the Inspector will check the policies in the Plan against various tests set out in paragraphs 178-181 of the (NPPF)

2.2 This statement has been prepared to outline the principal activities undertaken by the Bromsgrove District Council in the preparation of the Bromsgrove District Plan 2011-2030.

2.3 At the point that the duty to co-operate was introduced (November 2011) the BDP (formerly known as the Core Strategy) was already at an advanced stage of preparation having already been subject to six stages of informal consultation to inform the final draft plan.

2.4 Bromsgrove District Council has a long history of joint working and co-operation with its neighbouring authorities and key stakeholders to achieve better spatial planning outcomes. The BDP is no exception. On-going and constructive engagement with neighbouring authorities and relevant organisations has taken place since work on the Core Strategy began in 2004. It has long been recognized that when producing a local plan it is not possible to produce it in isolation as there are a number of cross boundary planning issues that need to be taken into account. Areas that neighbour the District and even those further afield can be affected by the proposals that Bromsgrove District Council plans for the next 15-20 years.

3 How does Bromsgrove interact with the wider area?

3.1 Bromsgrove District is situated in north Worcestershire lying to the south west of the West Midlands conurbation. The District is bounded by Birmingham, Dudley, South Staffordshire, Solihull, Redditch, Stratford-on-Avon, Wychavon and Wyre Forest. The District covers approximately 21,714 hectares. Although located only 22km (14 miles) from the centre of Birmingham, the District is predominately rural with approximately 91% of the land designated Green Belt. The West Midlands Green Belt extends all the way around the Birmingham and Black Country conurbation as well as around Coventry. It was established through previous development plans and has a range of functions including the control of urban sprawl and the prevention of towns merging into one another.

3.2 The connections of the District with areas beyond its boundary are also evident in the form of significant transport routes that cross the District, with the M5 running north to south and the M42 from east to west. The M5 and M42 connect with the M6 to the north of Birmingham and the M40 to the east. The District also benefits from train and bus connections into Birmingham City Centre and the wider region. Although the District benefits from excellent strategic road connections, it does experience localised environmental problems caused by high traffic volumes. The District has four Air Quality Management Areas and high carbon emissions are predominantly located around the motorways. Furthermore if there is a problem with traffic flows on the motorway(s) in the vicinity of Bromsgrove, traffic tends to divert through Bromsgrove, causing localised congestion and air quality issues at certain times.

3.3 The main centre of population in Bromsgrove District is Bromsgrove Town, with other centres being Wythall, Hagley, Barnt Green, Alvechurch, Rubery and Catshill and a series of smaller rural villages spread throughout the District.

Development pressures are high due to the District's proximity to the Birmingham conurbation and the motorway and railway connections. This exerts significant development pressures on the Green Belt.

3.4 In addition, interaction with neighbouring areas comes in other forms such as migration in and out of the District to live, as well as the distribution of raw materials and goods to other parts of the country to support the national and global economy. The District has strong environmental links with different areas, for example through its river valleys and sources of water supply. There are many sub-regional green infrastructure links that pass through the District, which are beneficial not only in terms of supporting biodiversity but also in helping manage the impacts of climate change, and in supporting leisure and recreational uses such as the Monarch's Way footpath and the Sustrans Number 5 National Cycle route.

3.5 Birmingham Plateau and Clent and Lickey Hills are located to the north of the area. The headwaters of 3 main rivers are located within the District including the River Salwarpe, Gallows Brook; and the River Arrow. The District is also traversed by 2 canals, the Worcester and Birmingham canal and the Stratford upon Avon Canal. The District is an area with rich biodiversity, geodiversity and attractive landscape. The District contains 13 Sites of Special Scientific Importance, 81 Special Wildlife Sites and 5 Regionally Important Geological and/or Geomorphological Sites. These sites are varied in their nature ranging from whole valleys and hills to ponds, reservoirs and rock exposures.

3.6 Interaction with adjoining areas can be expressed in a number of ways. In terms of people, interaction is often seen in the form of journeys to workplaces, to places of education, to shops, healthcare and other facilities, and to visit friends and relations. Of these different types of journeys, commuting to and from work and places of education tend to have the greatest routine impact on the transport network.

4 The implications for local planning

4.1 All of this interaction means that development in one area can have a significant impact on adjoining areas, and the larger the development, the greater the potential for wider and stronger effects. Co-operation with Neighbouring planning authorities on strategic matters is particularly important for those relating to sustainable development, strategic infrastructure or use of land that has, or would have, significant impact on at least two planning areas. Where these arise it may be appropriate to formally agree a joint approach to resolving these strategic matters during the preparation of development plan documents to ensure a consistent approach is taken. Co-operation with other bodies is also of importance in many cases for example to ensure the effective delivery of infrastructure required by proposed development.

4.2 This statement identifies activities that have taken place before the duty was introduced and others that are on-going. It should be emphasised strongly from the outset that BDC's approach is not confined to consultation

just to meet the statutory requirements. Rather, it is one based on building meaningful and productive engagement at the local level and ensuring that strategic solutions are reached at the appropriate scale with appropriate parties wherever these can be of benefit in the delivery of infrastructure and services to the communities. When taken together, these activities help to demonstrate how the duty to co-operate has been fulfilled in preparing the BDP.

Co-operation with prescribed bodies.

4.3 As described at paragraph 1.4 the prescribed bodies are defined in Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012 with those appropriate to the Bromsgrove District context being:

- Environment Agency;
- English Heritage;
- Natural England;
- Highways Agency;
- Homes and Communities Agency;
- Primary Care Trust;
- Office of Rail Regulation;
- Highway Authority

4.4 Throughout the preparation of the BDP there has been on-going liaison and co-operation with the nominated statutory bodies with issues being identified initially via formal liaison and the consultation process. The following paragraphs provide evidence of those prescribed bodies that had a direct influence on the plan's development and the outcome of that cooperation.

4.5 On transport matters involving the Highways Agency and Office of Rail Regulation BDC has worked in very close liaison with Worcestershire County Council as the relevant Transport Authority. In this capacity Worcestershire County Council has been the lead authority on these matters on behalf of BDC. This has enabled BDC to ensure that their liaison with these bodies has been meaningful and credible whilst at the same ensuring that all such contacts are relevant to the wider transport strategy context and that the planning proposals coming forward through the BDP demonstrably take account of the strategic infrastructure issues through the utilisation of joint (BDC/ RBC/ WCC/ HA) modelling and evidence gathering and assessment.

4.6 The outcome of this close working has been the production of a number of policies in the BDP that will enable the provision of a comprehensive infrastructure solution, including BDP16 Sustainable Transport policy and RCBD1 together with the Infrastructure Delivery Plan. Other key outcomes includes the preparation of the Transport Network Analysis and Mitigation Report for Bromsgrove and Redditch in May 2013 which influenced the spatial strategy by:

- Demonstrating the overall impact of the proposed development on the road network

- Providing the basis for transport infrastructure costs and implications for delivery

4.7 Responses to informal and formal consultations led to amendments to strategic policies BDP16 Sustainable Transport policy and RCBD1. Highways officers attended the BDP consultation events, answering technical and transport policy questions raised by the public, resulting in more effective consultation and informed responses. Highways officers have also commented on the proposed housing and employment allocations in terms of their impact regarding highway issues and sustainable transport facilities together with comments on the impact on the network of detailed planning applications and suggested developer contributions. The Councils continue to work closely together to ensure the most up to date highways and transport evidence is fed into the plan.

4.8 Joint discussions have taken place with the Highways Agency to resolve implications of future development on the Strategic Road Network (SRN). This has involved meetings and input into the Highways Agency Route Based Strategies which will inform future HA investment based on future growth.

4.9 Co-operation with the Environment Agency has been extensive and ongoing, particularly in relation to input on Levels 1 and 2 of the Strategic Flood Risk Assessments and the Outline Water Cycle Study. Consequent to these discussions and the updating of the evidence base the joint working contributed directly to a significant strengthening and updating of the relevant policies (policy BDP 23 Water Management, and also amendments to policies concerning Town Centre regeneration sites.

4.10 At earlier stages of the Plan, they were also involved in the development of Sustainability Appraisal objectives to assess the social, economic and environmental effects of the Plan. At the time of preparation of this report (September 2013), work is ongoing under the Duty to Cooperate to address concerns expressed by the EA regarding future development proposals.

4.11 Representations were also received from English Heritage on the BDP. The original policy has been rewritten to provide a clearer strategic framework for the protection of the historic environment and a focused approach to the management of the historic environment. Less formal engagement has been ongoing regarding a considered future site allocation for cross boundary Redditch growth close to the Hewell Grange Registered Park and Garden. This engagement has progressed with the council recently receiving confirmation from English Heritage that they will continue to support BDC on this matter.

4.12 All of the nominated Prescribed Bodies have been invited by BDP to participate on the various consultation stages on both the District plan and where necessary specifically the Infrastructure Delivery Plan, and through other less formal avenues.

5 Other Local Authorities

5.1 Birmingham City Council

BDC and BCC have a long history of joint working, the main issues and outcomes are identified below.

Issues

Longbridge - Closure of MG Rover car factory at Longbridge. Implications for economy and opportunity for major mixed use cross boundary redevelopment scheme.

Housing - Unmet housing needs arising from Birmingham and the potential impact on Bromsgrove's Green Belt.

Economy - Impact of proximity of conurbation in terms of out migration and commuting, the economy of Bromsgrove is characterised by strong commuter links with Birmingham.

How dealt with

Longbridge - extensive joint working on the preparation and subsequent adoption of the Longbridge AAP which was formally adopted by both councils in April 2009

Housing and economy - Discussions at high level including Chief Executive, Leaders and senior officers, on the implications of Birmingham's housing need and potential for expansion of the City outside its administrative boundary. Also an exchange of letters to confirm understanding of the discussions /issues see appendix A below. Currently work has been commissioned to establish the housing need and potential future impacts on development requirements across the LEP area. BDC and BCC both heavily involved and committed to this study. Similar work to be commissioned on establishing similar information on employment requirements across the LEP area.

Current Outcome

Ongoing commitment to LEP and potential other studies and appropriate policy wording included in the Bromsgrove District Plan 2011 – 2030 to cater for identified future growth needs of the West Midlands conurbation. Policy BDP4 Green belt, includes a strong commitment to reviewing the green belt to help deliver the objectively assessed housing requirements of the west midlands conurbation.

As part of the SHMA update work that was undertaken in response to the South Worcestershire Development plan interim inspectors' findings. And in also in response to the housing policies in the Birmingham Plan 2031an additional scenario was included which looked at the impacts of higher migration coming into Bromsgrove primarily from the conurbation, this has fed into the identification of the BDCs objectively assessed housing need. A separate duty to cooperate statement which was proposed by BCC has also been agreed at political level which largely mirrors the above position and

clearly shows the ongoing and constructive engagement at all levels between the two authorities. This is also reproduced at appendix a below. Comments were also submitted to BCC in response to the Birmingham plan 2031 proposed submission in general supporting the policies contained in the plan and stressing

5.2 Redditch Borough Council

The most significant amount of cooperation in the current plan has been with Redditch borough Council.

Predominantly, the issues facing Redditch Borough Council (RBC) and Bromsgrove District Council (BDC) revolve around the limited capacity within Redditch Borough to accommodate growth needs and a previous assumption across the Region that unmet growth needs could best be partly accommodated in Bromsgrove District and partly in Stratford on Avon District.

The regional planning tier raised two key Redditch-related issues, namely the designation of Redditch as a Settlement of Significant Development (SSD) and limited development capacity within Redditch's administrative boundary to meet development needs.

The second of these forms the underpinning issue, which has led to the preferred cross boundary development option in both Redditch and Bromsgrove Development Plans and is explored further in this document.

The first issue relating to SSD status for Redditch has been resolved by virtue of the Government's removal of the regional planning tier. However, it is important to highlight that collaborative working across multiple local authorities was effective long before the introduction of the Localism Act (2011) and the current emphasis on the Duty to Cooperate. At the time (2007/09), the SSD designation for Redditch was an issue on which both LAs agreed and were able to present a collaboratively prepared response during Examination in Public (EiP) evidence preparation and at the EiP hearing itself. The RSS Panel Inspectors agreed with the Local Authorities (and other consultation submissions) that the SSD status for Redditch be removed. This course of action was identified as a recommendation in the Panel Report (September 2009) and demonstrates the successful collaborative approach of RBC and BDC.

In order to document events which relate to the above issues, Table 1 below presents a chronological account of events since 2006 in order to helpfully follow the history of the cooperation issues between the two Authorities. Following this, the pertinent Key Issues are identified and examined in greater detail. It should be noted that the introduction of the RBC and BDC shared service management team in April 2010, has facilitated and ensured alignment of working wherever possible i.e. sharing evidence gathering and resources, regular meetings etc, although the two councils still remain two independent local planning authorities.

Table 1 – Timeline of Redditch & Bromsgrove Cross Boundary issues:

Date	Mechanism	What happened?
14 November 2006	RBC response to WCC's response to the RPB's Section 4(4) Authorities brief	<ul style="list-style-type: none"> • Capacity of Redditch overestimated due to sites listed being completed already and some double-counting of existing commitments • Raised prospect of Green Belt development to North/North West Redditch in Bromsgrove District • First raised issues of development in SW Redditch Green Belt based on previous findings • First raised issues of development in NW Redditch Green Belt based on previous findings • Suggested more work on feasibility of options for growth
4 January 2007	Letter to P Maitland (WCC) - Redditch Joint Study	<ul style="list-style-type: none"> • RBC having difficulty understanding implications of higher growth options • Raised need for technical evidence about ability of the area to accommodate growth • Evidence must explore potential of viable locations beyond Borough's boundaries in Worcestershire and Warwickshire • Need to rule out or confirm the South West as a development option, an up-to-date survey needed
2 March 2007	RBC - RSS Spatial Options responses (Council endorsed response)	<ul style="list-style-type: none"> • RBC stated Options 2 and 3 result in issues with allocating new sites to meet demands of the housing options • Concern that without a Joint Study, WMRSS review process will not have information to determine whether RBC target meets WMRSS objectives and whether growth options are deliverable • Could include the consideration of new settlement as an alternative to dwellings in Green Belt within Redditch Borough, Bromsgrove District and Stratford-upon-Avon
5 March 2007	BDC - RSS Spatial Options responses (Officer response)	<ul style="list-style-type: none"> • BDC stated that there was limited justification for meeting Redditch's unmet need in Bromsgrove. • Considered narrowing of strategic gap between Redditch and MUA damaging to function of Green Belt and unacceptable part of either option 2 or 3. BDC stated allocation in Bromsgrove to meet housing needs of Redditch will be strongly resisted
22 February 2007	WCC - RSS Spatial Options responses	<ul style="list-style-type: none"> • WCC stated that to meet locally generated growth needs development would most likely have to be directed to the North West within Bromsgrove District. The only alternative would be to seek growth East to Warwickshire but this too has been ruled out in the past
12 June 2007	Letter to R Poulter (WMRA) re. Redditch joint study (WYG1)	<ul style="list-style-type: none"> • Grateful for WCC lead and support from BDC but concerned about SOADC and Warks CC lack of contribution • RPB should have taken a leading role in bringing all relevant parties to the discussion
2 May 2008	Joint letter to Mark Middleton re. cross boundary working (from RBC, BDC and SOADC)	<ul style="list-style-type: none"> • Concerned about no local robust arrangements for splitting the target • Concerned that second stage study may not be forthcoming • GOWM not expressed a will for second stage study • No political will from BDC and SOADC for commissioning second stage study

Date	Mechanism	What happened?
September 2008	RBC response to BDC Town Centre AAP (Issues and Options)	<ul style="list-style-type: none"> • RBC fully supported statement “centre to serve their local communities in terms of retail provision, access to services and cultural and leisure facilities. The role of Bromsgrove Town Centre is not to provide retailing facilities for those from other districts and nearby rural settlements” and AAP's recognition of the role of Bromsgrove Town Centre in line with Policy PA12B Non-Strategic Centres - West Midlands Regional Spatial Strategy Phase Two Review (Preferred Options) • RBC questioned appropriateness of wording when considering the role of Bromsgrove as set out in the WMRSS "expanded retailing so the town can compete with other shopping centres." • RBC considered it inappropriate to attract shopping from elsewhere other than to meet local needs of Bromsgrove • The response was considered alongside all other responses at the issues and options stage and fed into further iterations of the AAP, no further comments were received from RBC on subsequent versions and therefore the issues are considered resolved.
9 December 2008	RBC - WMRSS Preferred Option responses	<ul style="list-style-type: none"> • Elements of BDC and RBC response agreed and sent jointly. Namely: Climate change, Creating Sustainable Communities, Emphasis on development on brownfield land, Sustainable design and construction, Spatial Strategy Objectives, Planning in Partnership, The Sub-Regional implications of the Strategy (Worcestershire), Communities for the future, Improving air quality for sensitive ecosystems, The Spatial Strategy, Housing within the MUAs, Level and distribution of new housing development, Quality of the environment – Waste policies, Transport and accessibility • BDC and RBC objected to Redditch SSD (Settlement of Significant Development) designation • BDC, RBC and SOADC asks for the Redditch growth level to be split between authorities
8 December 2008	BDC - WMRSS Preferred Option responses	<ul style="list-style-type: none"> • BDC objected to Redditch growth level accommodated adjacent to Redditch citing alternative more strategically viable sites within the District • BDC and RBC objected to Redditch SSD designation • BDC, RBC and SOADC asks for the Redditch growth level to be split between authorities • Elements of BDC and RBC response agreed and sent jointly
3 December 2008	SOADC - WMRSS Preferred Option responses	<ul style="list-style-type: none"> • SOADC stated that evidence suggests that its necessary for Bromsgrove and/or Stratford-on-Avon Districts to take more than the 3,300 dwellings initially stated in the emerging RSS Revision • BDC, RBC and SOADC asks for the Redditch growth level to be split between authorities • The findings of the study (WYG2) should be incorporated into the final version of the RSS. This would enable the RSS to specify that none of the Redditch housing requirement would be accommodated in Stratford-on-Avon District
Cabinet Report 5 March 2008	WCC – WMRSS Preferred Option responses	<ul style="list-style-type: none"> • Without acceptable further explanation, WCC cannot support the policy amendment in relation to Redditch's designation as an SSD

Date	Mechanism	What happened?
8 December 2008	GOWM - WMRSS Preferred Option responses	<ul style="list-style-type: none"> • GOWM stated it would be helpful if RSS could be more specific in relation to Redditch allocations in neighbouring Districts • Suggested questions that the Panel might consider included: <i>“Does the draft RSS provide sufficient clarity to local authorities in preparing LDFs about the allocation of housing where there are cross border allocations, such as around Redditch?”</i>
9 December 2008	RBC response to Nathaniel Lichfield & Partners (NLP) Report	<ul style="list-style-type: none"> • RBC objected to NLP Report proposing additional growth towards Redditch in Bromsgrove District due to its SSD designation
April 2009	RSS Examination	<ul style="list-style-type: none"> • RBC, BDC and SOADC continuing to request a split target for both housing and employment • RBC, WCC and BDC objected to SSD designation • WCC suggest Redditch growth restricted to natural growth • RBC supported principle of accommodating natural growth but concerned that accommodating PO level of development undermines urban renaissance • RBC objected to NLP Report proposed increases to Bromsgrove and suggestion to direct towards Redditch • RBC submitted that studies (listed) provide up to date evidence • RBC and BDC suggested housing numbers a matter for panel but locations a matter for CS • BDC objected to level of Redditch growth within Bromsgrove and/or Stratford; re implications for Bromsgrove green belt • BDC now commented that housing 'overspill' can only abut Redditch border and not be allocated to more appropriate sites in Bromsgrove
September 2009	RSS Phase 2 Panel Report	<ul style="list-style-type: none"> • Inspectors conceded that these Authorities needed a steer • Recommended 7000 dwellings for Redditch's needs, this is rounded up • Around 3000 of the 7000 dwellings to be located adjacent to Redditch in Bromsgrove District (Panel Report p.88, Recommendation R3.1). Paragraph 8.84 p.194 states <i>“We agree, however, with Bromsgrove Council that the choice of locality around the boundary of Redditch should be locally determined whether at or adjacent to the Webheath/Foxlydiate or Brockhill ADRs or in the Bordesley Park area or in some combination of these possibilities or elsewhere”</i>. • Provision in Redditch should be at least 4,000 dwellings • The balance of employment to be located adjacent to Redditch in Bromsgrove District • Universally recognised Redditch has limited capacity • Provision in Redditch purely to meet local needs, not wider regional needs • Recommended removal of Redditch as SSD

Date	Mechanism	What happened?
		<ul style="list-style-type: none"> • Given constraints and overlapped travel to work area with MUA larger housing allocations not appropriate at Redditch • Green Belt review explicitly required to facilitate the development at Redditch in BD or SOAD • Disposition recognised to have not been resolved by the Councils. WYG Report intended to resolve issue, but did not • Near to Alvechurch, parts of Bordesley Park in clear view, some ADR and adjacent land appear well contained in landscape terms • No good reason to reverse October 2008 Study (WYG1) conclusions identifying parts or all of ADRs • Would have favoured development between Redditch and Studley on landscape and character grounds alone • Difficult to develop towards Studley or eastern Redditch fringe unless funded proposals solve traffic problems • Choice of locality around Redditch boundary to be locally determined • Important for closely aligned timetables and coordinated Examination
8 February 2010	Joint PINS Briefing	<ul style="list-style-type: none"> • Purpose was to consider what had been done so far in preparation of the two Plans and identify matters which may be problematic in terms of soundness • Cross boundary issues appear to present the greatest obstacle to the Plans' progress • Joint growth options for Redditch consultation is a promising start to joint working • There is still a lot of evidence-based work to undertake to inform the decision-making process • There appears to be some doubt as to which Plan is 'responsible' for cross-boundary strategic sites – PINS view is that both Plans have responsibility • Information should be collected and assessed on a joint basis and should be in place before either Plan is submitted • The matter of deliverability goes to the heart of both Plans and is a matter that should be jointly addressed • The issue of demonstrating the most sustainable and deliverable sites needs to be dealt with in both Plans, or their evidence bases, and the only sensible way to do so is through joint working • The Councils have set up a Joint Planning Board and a Joint Planning Advisory Panel which will provide the mechanism through which cross boundary issues can be aired • PINS welcomes the RSS Panels comments regarding the close alignment of Examination timetables • Options for 'swapping' employment/ housing allocations on SOAD/ BD land need to be explored jointly • Views of WMRA would need to be sought on the question of the effect these options would have on the general conformity of the Plans with the RSS • At any such Examination, it is critical that the two Councils are in a position to present a united front and produce robust evidence in support of their joint proposals • Any housing that is being provided specifically to meet RBs needs should go towards RBCs 5 year land supply • The same principle applies to employment land • If there is evidence which indicates a difference in house types to meet BDC or RBC needs, there is no inconsistency in the BDC Plan containing separate policies to deal with these requirements

Date	Mechanism	What happened?
		<ul style="list-style-type: none"> Capacity may be less than the Panel Report estimates. It should be possible to identify sufficient land to build in an element of flexibility Cross boundary development will involve removing land from the Green Belt. Proposals affecting the GB should relate to a timescale beyond the Plan period. If this is not the case, clear reasons need to be given Dealing with infrastructure costs, CIL etc jointly would benefit from BDCs previous experience when dealing with matters such as the Longbridge AAP
8 February to 30 April 2010	Joint development options consultation for Redditch expansion	<ul style="list-style-type: none"> Consultation for development targets for RB as recommended by the RSS Phase 2 Panel Report and options for accommodating the required development in BD
6 July 2010	DCLG letter from Chief Planner announcing revocation of RSSs	<ul style="list-style-type: none"> Revocation of RSSs announced with immediate effect Q&A attachment stressed that local authorities would be responsible for establishing the right level of local housing provision without the burden of regional targets Q&A attachment also stressed the importance of transparent justification for the housing numbers that should be based upon reliable information and defended at Examination Subsequent issues arose following this announcement relating to the legality of the process and the need for SEAs to be undertaken before revocation could take place After the change of Government and RSS revocation announcement: <ul style="list-style-type: none"> BDC reverted to its pre RSS stance in resisting the large scale GB releases to meet RBC needs RBC adopted a capacity-led approach and communicated a lack of political appetite for growth despite the evidence Joint working halted in late 2011
21 January to 31 March 2011	Revised Preferred Draft Core Strategy consultation	<ul style="list-style-type: none"> Consultation for 3200 dwellings (2006 to 2026). This target was based on the currently identified deliverable sites within Redditch RPDCS stated that <i>“later in 2011, following more detailed evidence being collected and once some further clarity on the correct mechanisms for dealing with the Redditch growth issue is established, the Borough Council will be in a position to consult on all issues, both cross boundary and internal growth.”</i>
21 January to 15 April 2011	RBC officer response to BDC Draft CS2	<ul style="list-style-type: none"> Highlights that Plan fails to address cross boundary issues Offers to work collaboratively with BDC to research any new or emerging guidance on determining a locally derived housing requirement, other development requirements and to develop shared approaches which are consistent and which should be considered sound at Examination
March 2011	County-wide SHMA commissioned	<ul style="list-style-type: none"> All six Worcestershire Authorities jointly commissioned the preparation of a SHMA to evaluate existing housing stock, analyse the future housing market and project the needs of future households which might occur under different

Date	Mechanism	What happened?
	(Published February 2012)	scenarios <ul style="list-style-type: none"> • The SHMA included separate Overview Reports for each Local Authority, which focussed on key areas and presented a more detailed individual authority narrative • RBC supplemented the SHMA Report with a further Annex (May 2012) to identify a specific housing requirement for Redditch
15 November 2011	Localism Act comes into force	<ul style="list-style-type: none"> • Insertion into the P&CP Act 2004 of <i>“Duty to co-operate in relation to planning of sustainable development”</i> • LPAs must co-operate to maximise the effectiveness of development plan preparation • The duty imposed requires constructive, active and on-going engagement
27 March 2012	Publication of the NPPF	<ul style="list-style-type: none"> • <i>“Planning strategically across local boundaries”</i> – paras 178-181 set out guidance for effective co-operation
27 April 2012	PINS briefing with Joint Management Team, RBC and BDC Members	<ul style="list-style-type: none"> • PINS advice at this meeting was interpretation of the intention of how the new planning system will work • Recognition that the situation had become more complicated without the regional tier • Emphasis on Duty to Cooperate • It would be a problem if the LA did not seek cooperation. This is a legal issue and there is nothing PINS can do about it • PINS considered that the Councils could demonstrate the Duty to Cooperate based upon what had already been done jointly • If there is a need to cooperate, can cooperation be demonstrated and is the outcome effective? • 5 years land supply would need to be demonstrated in the Plan and questioned whether the authorities were ‘persistent under deliverers’. LAs would need to take into account peaks and troughs in the property market potentially over a 6-10 year period. If a 5 year supply of land cannot be demonstrated then LAs vulnerable at appeal • A robust housing figure would be needed which was capable of withstanding challenges made at the Examination • Highlighted the tension between the notion of localism and the presumption in favour of sustainable development • Government priority is the delivery of houses and local views cannot ‘trump’ a national policy • PINS accepted the principle that the two plans could be brought forward in parallel but neither authority would be able to progress significantly ahead of the other
3 May 2012		<ul style="list-style-type: none"> • As a result of the local elections in May 2012 there was a change of political control to Labour at RBC
5 July 2012	RBC Leader Duty to Cooperate letter to BDC Leader	<ul style="list-style-type: none"> • Intention of letter is to establish the first formal agreement of joint working under the new Duty to Cooperate • States LPA responsibilities under Localism Act • States relevant NPPF Guidance • States that PAS has suggested various forms of evidence to demonstrate compliance with the Duty to Cooperate • Outlines RBC issues of limited development capacity and the possibility of accommodating development to the north/north west of Redditch in BD, preferably contiguous to the boundary

Date	Mechanism	What happened?
		<ul style="list-style-type: none"> Stresses the importance of addressing the Duty to Cooperate issues as soon as possible in the plan making process States that PINS is unable to assist LPAs in resolving Duty to Cooperate problems and that all issues must be resolved before plans are submitted for Examination
3 August 2012	BDC Leader's response to RBC Leader's Duty to Cooperate letter	<ul style="list-style-type: none"> Acknowledges BDCs responsibility under Duty to Cooperate and that BDC will be happy to formally open discussions with RBC Acknowledges the issue of BD accommodating Redditch growth needs has challenged both LPAs for a number of years without resolution RBC request for joint working is a step closer to securing some certainty on this issue which will allow both LPAs to prepare and adopt sound development plans BDC officers have been instructed to continue working with RBC officers in an attempt to find a mutually acceptable solution to the issue
6 December 2012	Joint Member Briefing	<ul style="list-style-type: none"> Member briefing in Bromsgrove for Members from both Councils to present the findings of the Green Belt Review and the identification of locations for cross boundary growth
18 February 2013	Redditch Full Council	<ul style="list-style-type: none"> RBC Members voted not to endorse consultation material on cross boundary growth and hence not proceed with planned joint consultation on this issue nor with emerging Local Plan No 4
21 February 2013	BDC Leaders Duty to Cooperate letter to RBC Leader	<ul style="list-style-type: none"> Reminds RBC of Duty to Cooperate Asks RBC to reconsider Executive decision States that BDC resolved to go out to consultation on issue but would delay start of consultation to give RBC time to reconsider
25 March 2013	Redditch Full Council	<ul style="list-style-type: none"> Members reconsidered the decision taken on 18 February and voted to endorse the consultation material on cross boundary growth and emerging Local Plan No.4
1 April to 15 May 2013	Joint Housing Growth consultation	<ul style="list-style-type: none"> Joint consultation for two cross boundary development locations in BD, contiguous to RB. Site 1 – Foxlydiate (2400 dwgs) and Site 2 – Brockhill East (600 dwgs)
23 April 2013	DCLG letter from Chief Planner announcing formal revocation of the WMRSS	<ul style="list-style-type: none"> Letter informs that the Order to revoke the RSS had been laid before Parliament and the Order would come into force on 20 May 2013
30 September - 11 November 2013	Publication of Bromsgrove District Plan 2011-2030 and Redditch Local	<ul style="list-style-type: none"> Aligned publication of both Plans at Proposed Submission stage and aligned period for representations with a view to eventual aligned date for Submission stage and Examinations in Public.

Date	Mechanism	What happened?
	Plan No 4 (Proposed Submission version)	
30 September 2013	Publication of IDPs	<ul style="list-style-type: none"> • IDP evidence to support delivery of both Plans involved joint working and consultation with infrastructure providers to produce individual IDPs with identical joint transport sections
10 December 2014	CLG briefing with Joint Management Team, RBC and BDC Officers	<ul style="list-style-type: none"> • CLG advice at this meeting regarding next steps if there was a rise in housing / employment numbers as a result of the Worcestershire SHMA refresh and GBSLEP Study • CLG advised that it would be logical for RBC and BDC to join up with the South Worcestershire Councils in providing an updated Objective Assessment of Housing Need for Worcestershire and to wait until this work was concluded before progressing to submission. • The outcomes of the GBSLEP study can be dealt with at later stages of the plan period and there is no need to include capacity for Birmingham's needs in the current plans until the need within the LPA's areas are clearly established
December 2013	County-wide SHMA Re-refresh commissioned	<ul style="list-style-type: none"> • The Worcestershire SHMA (2012) was submitted as part of the evidence base with the South Worcestershire Development Plan Submission Document. Following the Initial Hearing sessions the Inspector published his Interim Conclusions which outlined how the SHMA should be revised to help provide an updated Objective Assessment of Housing Need (OAHN) • All six Worcestershire Authorities jointly commissioned the preparation of a SHMA refresh. • The work commissioned recognises that demographic and jobs change circumstances in the South and North of the County of Worcestershire vary. The SHMA refresh therefore has in-built flexibility in both original and the updated studies to enable different scenarios to be applied on a sub-regional basis whilst employing the same core data and methodologies including sensitivity scenarios. • SMHA Re-refresh accepts that there is a degree of overlap in North Worcestershire and specifically Bromsgrove and Redditch districts with the Birmingham metropolitan area housing market area. • BDC and RBC will supplement the SHMA Re-refresh to develop further the migration scenarios to consider the implications for housing need arising from internal migration within the Birmingham metropolitan housing market area (which includes Redditch and Bromsgrove Districts) and from potential unmet housing need arising from Birmingham.

Issues

The following cross boundary strategic issues have been identified jointly by RBC and BDC:

Unmet Redditch Housing need
Unmet Redditch Employment need
Infrastructure Delivery

The Section below explains key issues and options that have arisen and been addressed by Redditch Borough Council and its Bromsgrove District Council neighbour.

Issue: Unmet Redditch Housing Need

Background

It was established early on in the Phase 2 review of the WMRSS that there were limits to Redditch Borough's capacity to accommodate the required levels of sustainable development. RBC has explored its development capacity in detail but still has a shortfall of available and suitable land to meet its development needs. By way of introduction to the RBC/BDC issue of resolving unmet housing need, this background information sets out the housing requirement and then details the undertakings to explore capacity within the Borough, firstly focussing on the urban area, and then on Green Belt and Areas of Development Restraint (ADR).

Redditch Housing Requirement:

Although the regional planning tier has been removed, the evidence that underpinned the RSS is still considered to be robust as it has been scrutinised through the RSS Examination process. In order to move away from Government set housing targets, the NPPF promotes setting locally derived requirements as long as they are based on robust evidence, which meets the full objectively assessed housing need.

Undertaking a Worcestershire-wide Strategic Housing Market Assessment (SHMA) presented the six Worcestershire Authorities with the opportunity to determine housing requirements based on more up-to-date population projections than those used in the RSS evidence base. The SHMA (Feb 2012) presented a range of scenarios, within which development requirements should fall. RBC undertook further SHMA work to take account of migration issues raised in the main SHMA report in order to pinpoint a robust housing requirement figure on which to progress a sound Local Plan.

The SHMA Annex (May 2012) concluded that Redditch related housing need equated to 340 dwellings per annum/ 6400 dwellings over the Plan period. Redditch has limited capacity to meet this need within its administrative boundary.

In December 2013, all six Authorities jointly commissioned the preparation of an update to the Worcestershire SHMA (2012) to help provide an updated Objective Assessment of Housing Need (OAHN).

This work recognises that demographic and jobs change circumstances in the South and North of the County of Worcestershire vary. The SHMA refresh also accepts that there is a degree of overlap in North Worcestershire and specifically Bromsgrove and Redditch with the Birmingham metropolitan area housing market area.

RBC and BDC have asked for further additional work to supplement the 2014 SHMA refresh to address the specific circumstances influencing housing requirements in these areas. Specifically, Redditch Borough and Bromsgrove District have developed a further the migration scenarios which begins to consider the implications for housing need arising from internal migration within the Birmingham metropolitan housing market area (which includes Redditch and Bromsgrove Districts) and from potential unmet housing need arising from Birmingham.

Redditch Urban Capacity:

There has been a lot of debate and speculation about Redditch's urban capacity throughout the RSS process. RBC took an open book approach to its SHLAA throughout the process, and agreed to external scrutiny on numerous occasions. Initially the capacity was scrutinised by participants in the RSS Examination process including developers, agents, adjoining authorities, other government bodies and indeed the Panel itself. Furthermore, both WYG 1 and WYG2 considered the Redditch internal capacity issue, including a full review and a review of previously dismissed sites and all open spaces and ecological sites within the town. Throughout all of these processes there has been no significant additional capacity identified.

The first Redditch SHLAA was undertaken in 2008. At this point in time, due to the awareness of the probable shortfall in capacity within the Borough, RBC and BDC officers worked closely together to develop an aligned SHLAA methodology and site assessment appraisal process. There was an acknowledgement by both Local Authorities that, although there was no firm conclusion that BDC would meet Redditch's housing capacity shortfall in its District, joint SHLAA preparation offered an appropriate opportunity to develop an aligned methodology should a joint capacity evidence base be required in the future. Once the methodology and appraisal processes were agreed, both LAs proceeded to assess sites within their administrative boundaries separately.

Following the RSS revocation announcement, BDC wished to further assess the capacity of the urban area so it could be satisfied that Redditch growth needed to be met in Bromsgrove District and prudent use of its Green Belt could be clearly justified to residents and members. Officers from both

authorities undertook a thorough review of a range of various sites which RBC officers had previously dismissed from contributing towards its capacity. In all, 42 sites were considered as part of this exercise. This exercise offered a joint opportunity for frank and open scrutiny of the RBC SHLAA methodology and the opportunity to discuss the conclusions drawn regarding the appropriateness of site dismissals, especially in the context of RBCs high open space standard. As a result, there was no significant additional capacity identified and BDC concurred with the original RBC SHLAA conclusions.

Redditch Green Belt and ADR:

The recommended policy stance about the future status of Green Belt and ADR land within Redditch has become a confusing matter during the course of the plan-making process. The Redditch capacity assessments which informed the RSS process before spatial options were developed, excluded Green Belt development within Redditch. However once the RSS Preferred Option was released it became clear that growth in Redditch would be a lot higher than previously anticipated and would require Green Belt and ADR land to be considered as available capacity. As part of RBCs response to RSS consultation, it was stated that development in the Green Belt to the south west of Redditch's urban area was highly unlikely to be deliverable due to constraints and should be discounted from offering any capacity contribution at an early stage. WYG1 did not appear to imply that there would be any issues with including ADR or Green Belt in north Redditch for development. However by the time WYG2 was produced the consultants had reversed this conclusion.

The RSS Panel report concluded that there were no valid reasons to exclude ADR land, and the Panel report recommendations about growth and Green Belt around Redditch would suggest that the principle of development at northern Green Belt areas was necessary. Subsequently a planning application was submitted for 200 dwellings and 5000 sqm. of B1 office development on the Brockhill ADR at Weights Lane. The open space element of the proposal was located cross boundary in Bromsgrove District. As a consequence of this, both LAs considered and subsequently approved the planning application. This proposal enables the ADR to be opened up at its eastern extent to ensure appropriate connectivity with Brockhill East (west of the railway) and the existing highway network. It was important that both LAs recognised the importance of enabling delivery of this site in order to secure opportunities and access to the wider northern Green Belt area both within Redditch Borough and beyond the Borough boundary in Bromsgrove District.

The RSS Panel recommendation to consider meeting Redditch needs cross boundary, acknowledges the RBC stance that development within the Borough in the south west Green Belt at the levels being proposed was unsuitable at that time. Further consideration of all the sites around Redditch was carried out as part of the Housing Growth Development Study (2013), which is discussed further below.

The unmet Redditch housing need Issue:

Since the Panel Report was released Bromsgrove and Redditch Councils undertook a joint consultation on Redditch growth options (Feb 2010). The consultation focussed on three broad locations for development options in an arc to the north/ north west of Redditch's urban area. The Councils' received mixed opinions about the public preference for preferred locations for growth.

Since that time, the Government announced the revocation of the RSS which caused confusion and subsequently some delay in reaching a commitment to having a robust housing requirement from RBC and agreement from BDC to meet the growth requirements for Redditch. However, the six Worcestershire Districts did establish an up to date local evidence base through the Strategic Housing Market Assessment (SHMA). The draft findings of the SHMA, which presented a range of development scenarios for all six LAs, were presented to all LA members. As the SHMA was being finalised (2012), the NPPF was published and a joint discussion with PINS was undertaken with Members from both LAs to consider an appropriate way forward for both LAs Plans.

In May 2012, there was a change in political governance at RBC and an Annex for Redditch growth was undertaken to further analyse the SHMA scenarios and establish a housing requirement for Redditch.

With the two authorities of Bromsgrove and Redditch understanding the housing growth implications and levels of growth necessary, collaboration recommenced to find the Authorities' preferred growth location and this itself involved the investigation of a number of options. The collaborative approach of officers was underpinned by the formal acknowledgement and acceptance of the Duty to Cooperate by the Leaders of both LAs.

Options for resolving unmet Redditch housing need:

The option to deal with collaborative plan-making across administrative boundaries culminated in the preparation of the Housing Growth Development Study, which involved Broad Area Appraisals of all 20 areas around Redditch's urban area identified in WYG1, followed by Focussed Site Appraisals in the areas deemed to have the most growth potential. Undertaking the Study included joint team meetings to set out a methodology and a joint survey team to undertake the on-site assessments. The site assessments and subsequent Sustainability Appraisal led to the development of scenarios for alternative growth locations and a joint preferred option.

The identification of a preferred option for development led to the development of a cross boundary housing growth policy, which was the subject of a joint consultation period in April and May 2013. The consultation period and subsequent response to representations work was undertaken jointly by both Councils.

Outcome:

The outcome has resulted in both Plans preparing for concurrent proposed Submission/ Submission. BDCs District Plan includes a policy called

'Redditch Cross Boundary Development' jointly prepared and agreed by both Councils (within the Plan), which is included as a referenced Appendix in the RBC Local Plan.

Issue: Unmet Redditch Employment need

There has persistently been a call from the three authorities of RBC, BDC and SOADC for an indication of a development requirement split, mainly so that Bromsgrove and Stratford Councils have some clarity about what their plans would need to deal with. The RSS Panel recommended that the cross boundary employment provision be met through provision of at least 12 ha within SOAD, west of the A435 and the balance remaining out of a total of up to 37 ha in BD at a location or locations to be agreed in the RBC and BDC Plans.

Cross boundary provision of land for employment use is an issue which has previously been addressed by BDC in relation to RBC shortfall. The Ravensbank Business Park to the north east of the Borough was allocated for up to 30 ha of development in the Bromsgrove District Local Plan (2004) (policy E2). Furthermore, the Bromsgrove District Local Plan made provision for an Area of Development Restraint of 10.3 ha to the south east of the allocated land at Ravensbank (policy BE3). The purpose of the ADR was to satisfy possible future Redditch employment needs, beyond the Plan period.

Options:

Two options were viable to investigate, firstly cross boundary provision at Ravensbank and within SOAD, and secondly, identification of alternative employment locations in other BD areas analysed through the Housing Growth Development Study. A limited amount of land with employment opportunities was identified through the HGDS in an alternative location. However, the analysis concluded that this land was not needed as sufficient land was available to meet Redditch's employment needs at Ravensbank and it was therefore unnecessary to release further Green Belt land in this location for employment purposes.

Outcome:

There was sufficient land (15 ha) at the Ravensbank ADR coupled with outstanding capacity at the Ravensbank Business Park, in a location where employment development was already established and further cross boundary opportunities with SOADC were emerging. Both BDC and SOADC acknowledge the need to meet this requirement for Redditch within their Plans.

Issue: Infrastructure Delivery

It has long been recognised that critical discussions on infrastructure capacity and planning may be more effectively and efficiently carried out over a larger area than a single local planning authority area. Paragraph 179 of NPPF states that LPA's should consider producing joint planning policies on

strategic matters and informal strategies such as joint infrastructure and investment plans.

Infrastructure needs are not necessarily constrained by LA administrative boundaries and both authorities need an understanding of the impact of development on their areas. It was acknowledged that the cross boundary sites in particular would impact on infrastructure in both authorities for example; schools, drainage and highways and a detailed understanding of these joint aspects was therefore essential. Both authorities also need to demonstrate that their plans are deliverable which means ensuring that the infrastructure needs of development are identified and viable.

Options:

Three options were explored to approach Infrastructure Delivery in both authorities:

1. Authorities to work separately, duplicate work and prepare IDPs which may be complementary. This was considered to be a waste of resources and may have stored up future problems.
2. Authorities to share resources and work efficiently together to prepare independent IDPs. This was the method chosen as it made sound economic sense for both authorities to work together in obtaining information from infrastructure providers. The sharing of resources meant that efficiencies in the use of resources could be made for the authorities (and the infrastructure providers) in collecting similar information for both authorities at the same time.
3. Authorities to work together to prepare joint IDP. This option was not considered realistic as both authorities have independent and separate Plans containing growth and policies which are unrelated to the other area.

Outcome:

Joint working on collecting up to date information was carried out. This involved compiling Infrastructure packs which were sent to infrastructure providers. The infrastructure packs explained background context in both areas: the purpose of the consultation and what information was needed. The joint working also involved the sharing of contact databases; joint meetings where necessary with various infrastructure providers; agreeing a joint section on transport to be included in both IDPs and agreeing the next steps.

Both Authorities now have IDPs which are fully informed by up to date information from infrastructure providers to support the delivery aspects of both Plans. It should be noted that due to the nature of the transport IDP work it proved impossible to separate this work out between the two authorities, so an agreed replica section is included in each document. These IDPs are 'live' documents and capable of being updated as new evidence emerges. IDP's were consulted on during the representation period of the Publication of the

Proposed Submission documents from 30th September to 11th November 2013. Any new evidence on infrastructure delivery is now incorporated into revised Infrastructure Delivery Plans as appropriate.

Plan-making evidence base

To underpin the premise of collaborative working by the two Local Authorities, several studies have been undertaken or commissioned, which form a Joint Evidence Base, upon which both Plans rely:

- WYG1 (Dec 2007)
- SHLAA – shared methodology (2008)
- WYG2 (Jan 2009)
- Bromsgrove and Redditch Strategic Flood Risk Assessment Level 1 (2009)
- Bromsgrove and Redditch Scoping Water Cycle Study (Jan 2009)
- Green Infrastructure Baseline Report (2010)
- SHLAA – interrogation of RBC SHLAA by BDC (Oct 2011)
- Bromsgrove and Redditch Strategic Flood Risk Assessment Level 1 (2012)
- Worcestershire SHMA (Feb 2012)
- Worcestershire SHMA - Redditch Updated Household Projections Annex (May 2012)
- Bromsgrove and Redditch Outline Water Cycle Study (May 2012)
- Housing Growth Development Study (Jan 2013)
- Bromsgrove and Redditch Cross boundary sites (transport modelling) (Jan 2013)
- Hewell Grange Estate – Setting of Heritage Assets Assessment (Jan 2013)
- IDP

5.3 Worcestershire County Council

Engagement with WCC has been on the basis as Infrastructure provider for Highways, education, waste, minerals, flooding (LLFA), libraries etc, and as facilitator of county wide joint working / assessments on:

Green infrastructure

Other infrastructure as identified above

CIL Viability assessment

Strategic Housing Market assessment

County wide agreed SA objectives

No significant issues have been identified although continual work on the ensuring WCC are fully involved on the updating of the IDP will be essential, as will continual liaison with WCC highways and the HA on transportation issues.

5.4 Dudley Metropolitan Borough Council

Issues

Developments - Impact of development close to boundary and potential impact on Black Country regeneration corridors.

Housing Need - potential for housing needs of West Midlands conurbation to be met in adjoining authorities.

How dealt with

Development s - Via inter authority liaison and cooperation on planning application consultee responses, and policy officer meeting with Black Country authorities.

Housing need - via engagement in LEP studies as identified in BCC section above, although it is acknowledge that Dudley is not in the GBSLEP it is expected to contribute to the GBSLEP housing study. Further engagement with Black country authorities on Bromsgrove District Plan 2011 – 2030.

Outcome

Developments - Ongoing inter authority liaison and cooperation on planning application consultee responses, further engagement with Black country authorities on Bromsgrove District Plan 2011 – 2030. Further meeting arranged for April 2014

Housing need - Ongoing commitment to LEP and potential other studies and Appropriate policy wording included in the Bromsgrove District Plan 2011 – 2030 proposed submission version to cater for identified future growth needs of the West Midlands conurbation. The Black Country authorities have now joined in with the GBSLEP housing study and as such any issues arising as a result will and can be dealt with similarly to that with Birmingham. No issues raised as part of the regulation 19 stage of plan production.

5.5 Solihull Metropolitan Borough council

Issues

Development - Impact of proposed developments close to boundary with resultant demands on infrastructure

Housing Need - potential for housing needs of West Midlands conurbation to be met in adjoining authorities.

How dealt with

Via inter authority liaison and cooperation on planning application consultee responses.

Housing need - via engagement in LEP studies as identified in BCC section above and further engagement with Solihull on Bromsgrove District Plan 2011 – 2030

Outcome

Ongoing commitment to LEP and potential other studies and Appropriate policy wording included in the Bromsgrove District Plan 2011 – 2030 proposed submission version to cater for identified future growth needs of the West Midlands conurbation. No issues raised as part of the regulation 19 stage of plan production.

5.6 Stratford-on-Avon District Council

Issues

Eastern Gateway employment site
Housing in vicinity of A435 - this is an issue for Stratford-on-Avon and Redditch to resolve as the site is within RBC

How dealt with

Joint working on Eastern Gateway scheme (Gorcott/Ravensbank/ Winyates Green) between 3 Councils and NW Economic Development and Regeneration. Jointly commissioned GVA to carry out Economic Impact Study March 2013.

Outcome

Ravensbank ADR part of the eastern gateway site included in the Bromsgrove District Plan 2011 – 2030, further commitment to joint working to bring this development opportunity forward. Further exchange of letters in response to new proposals published by Stratford on Avon no strategic issues identified, and no issues raised as part of the regulation 19 stage of plan production.

5.7 Malvern District, Wychavon District and Worcester City Councils

Issues

No strategic issues identified

Outcome

Agreed position statement , see letter below.
Additional agreed statement as a result of further work carried out in relation to the interim findings of the inspector on the south Worcestershire development plan.

5.8 Wyre Forest District Council

Issues

No strategic issues identified

Outcome

Agreed no strategic issues, see letter below

5.9 South Staffordshire Council

Issues

No strategic issues identified

Outcome

Agreed no strategic issues, see letter below

6 Other Prescribed Bodies

6.1 Environment Agency

Statutory Consultee at all stages of plan making process including SA, SFRA, WCS, no issues identified at this stage to prevent progress of the Plan. Representation received at regulation 19 stage, further discussions took place as a consequence and agreement reached on a policy position for the final plan. Representation did not express and concern at the activities of the council under the duty to cooperate.

6.2 English Heritage

Statutory Consultee at all stages of plan making process including SA Input in relation to major potential strategic allocation at Hewell Grange Grade2* Registered Historic Park and Garden. Representation received at regulation 19 stage follow up meeting arranged and as a result continued support received from English heritage on the content of the BDP. Representation did not express and concern at the activities of the council under the duty to cooperate.

6.3 Natural England

Statutory Consultee at all stages of plan making process including SA. Checking of HRA at all relevant stages. Support for the plan identified at regulation 19 stage, minor changes requested which have all been taken on board in the schedule of minor changes. Representation did not express and concern at the activities of the council under the duty to cooperate.

6.4 Civil Aviation Authority

Consultee on stages of plan making process including SA Responded saying that they do not wish to be consulted unless it is a planning application.

6.5 Homes and Communities Agency

Statutory Consultee at all stages of plan making process including SA Major landowner of potential strategic site in Green Belt. Representation submitted promoting a site for inclusion in the plan, which will be considered as part of the EIP. Representation did not express and concern at the activities of the council under the duty to cooperate.

6.6 Primary Care Trusts/NHS Trust/ Clinical Commissioning Group

Statutory Consultee at all stages of plan making process including SA. Member of Bromsgrove Partnership. Involvement via IDP process. No formal representation received at regulation 19 stage, although continue to work with the council as part of the IDP and Bromsgrove partnership mechanisms

6.7 Office of the Rail Regulator

Consultee on plan making process. See reference at para 4.5 above

6.8 Highways Agency

Statutory Consultee at all stages of plan making process including SA M42 and M5 pass through Bromsgrove District. See reference above para 4.5 Continue to be involved in IDP work.

Representation received at regulation 19 stage general support for the plan although the post 2022 growth will need further consideration. Representation did not express any concern at the activities of the council under the duty to cooperate.

6.9 Highway Authorities WCC

Statutory Consultee at all stages of plan making process including SA See reference above IDP work.

No formal representation received at regulation 19 stage, although continue to work with the council as part of the IDP and evidence base collection as identified at para 4.5 – 4.8 above.

7. Bodies not covered by statute but which Councils should have regard to:

LEPS

7.1 Greater Birmingham and Solihull (GBSLEP)

Bromsgrove is represented on the LEP at all appropriate levels, and have engaged in the preparation of the brief for the current housing study, as well as ongoing input in to the LEP spatial framework. No formal representation received at regulation 19 stage and no Duty to cooperate issues raised in other forums.

7.2 Worcestershire LEP (WLEP)

Bromsgrove is represented on the LEP at all appropriate levels and continue to support the LEP priorities including the development of the Redditch Eastern Gateway, partly falling within Bromsgrove and Stratford-on-Avon Districts. No formal representation received at regulation 19 stage and no Duty to cooperate issues raised in other forums.

7.3 Local Nature Partnerships (LNPs)

Local Nature Partnerships (LNPs) are partnerships of a broad range of local organisations, businesses and people who aim to help bring about improvements in their local natural environment.

BDC has sought opportunities to work collaboratively with local authority, statutory and voluntary members of the Worcestershire LNP through consultation at various stages of the plan preparation process. Consultation with members of the Worcestershire LNP have focused on the content of the emerging policies within the Local Plan regarding biodiversity.

Utility companies:

7.4 Severn Trent Water Ltd

Representations on plan making.

Involvement in Levels 1 and 2 SFRA and Outline Water Cycle Study.

Modelling of cross boundary growth scenarios carried out by STWL.

Involvement in IDP preparation.

Representation received at regulation 19 stage, further discussions took place as a consequence and agreement reached on a policy position for the final plan. Representation did not express any concern at the activities of the council under the duty to cooperate.

7.5 South Staffs Water

Involvement in IDP preparation.

No formal representation received at regulation 19 stage and no Duty to cooperate issues raised in other forums.

7.6 National Grid Gas

Involvement in IDP preparation.

No formal representation received at regulation 19 stage and no Duty to cooperate issues raised in other forums.

7.7 Western Power Distribution

Representations on plan making.

Involvement in IDP preparation.

Liaison also via WCC Infrastructure Strategy.

No formal representation received at regulation 19 stage and no Duty to cooperate issues raised in other forums.

Duty to co-operate BDC timeline			
Date/ period	Body (+ BDC)	Project	Interaction
ongoing	WPOG		Meetings and tasks ie MuO
ongoing	POG		Meetings and tasks
ongoing	CADHAG		Meetings of EH, County and District Conservation officers to share information, learning and complete tasks
2007-ongoing	LSP (Bromsgrove Partnership) Act on Energy, BARN, BDHT, NEW college, NHS Worcs, RBCCG, West Mercia Police, CALC and WCC	A forum for local organisations to come together and address issues that are important	Board meetings Theme groups
2005-ongoing	EA, EH, NE	Sustainability Appraisal	Involvement in all stages of development of LDF/local plan
2005-to date	Birmingham City Council	Longbridge Area Action Plan	1) Longbridge Project meetings 2) Longbridge Delivery Board meetings
May 2006-2009	WCC and Districts/ Borough, EA, EH, NE	Worcestershire Joint SA objectives	Working group meetings
Dec 2007	WCC, RBC, SDC	WYG 1	Joint working and funding
Early 2008	Redditch BC	Agree SHLAA methodology	Joint meetings
20/3/08-2/07/08	Redditch BC, Stratford DC and stakeholders	CIL and cross boundary working with infrastructure providers	Meetings with various service providers to establish contact, gain joint understanding of programmes funding and advise on future growth
3/09/08 (ongoing)	Highways Agency	Information exchange/communication/ identification of showstoppers	Meetings and involvement in HA Route Based Strategy work
9/9/08	Severn Trent/BT/Central networks	Information exchange/communication/ identification of showstoppers	Meetings
10/11/08	Redditch BC	RSS Phase 2 revision response	Joint member briefing on RSS Phase 2 Revision responses, indicating areas of agreement/disagreement between the 2 authorities
Dec 2008-to date	Redditch BC	Redditch Growth-Joint Leaders and	Joint Planning Advisory Panel meetings

(frequency irregular)		Member involvement	
09/09/08-20/11/09	Key stakeholders/ infrastructure providers (not 'prescribed bodies' under Regs but need to discuss cross boundary development with them regarding delivery)	Maintenance of ongoing dialogue with infrastructure providers	Meetings to discuss future infrastructure requirements (including cross boundary) with utility companies, STW, National Grid and Central Networks etc
Jan 2009	WMRA, WCC, RBC and SDC	WYG 2	Joint working and funding
Jan 2009	Redditch BC, EA and ST	Level 1 SFRA	Joint study
8/2/10	Redditch BC	PINS frontloading	Frontloading meeting
Feb- Apr 2010	Redditch BC	Redditch growth	Joint consultation
09/10	Worcs SCS	Single Sustainable Strategy for Worcs	Agree strategic vision for Worcestershire and focuses activity on what is needed in the short term to improve the quality of life of people who live, visit or work in the county.
10/10-ongoing	GBS LEP	Partnership to encourage economic regeneration	Meetings of partners/ stakeholders, visioning events and themed seminars. For example event hosted by Bromsgrove DC to 'play' LEP 'Delivering Growth across the GBSLEP' 22/11/13 Joint working on commissioning of Housing Study for LEP area. Regular meetings of: (1) GBSLEP Planning Sub-Group (2) GBSLEP Spatial Planning Group
12/10	W LEP	Partnership to drive economic development and enterprise and strategic leadership	Meetings of partners Agree objectives and produce Business Plan
Feb 2011-ongoing	WCC, Worcs authorities and stakeholders	Strategic Infrastructure delivery	Investment and Delivery Steering Group Meetings. Focus on Strategy priorities and 'gamechanger' sites. Attendance and presentations by key

			infrastructure providers
27/04/12	Redditch BC	PINS frontloading	Frontloading meeting
May 2012	Redditch BC, EA and ST	Outline Water Cycle Strategy	Joint study
2011-ongoing	WCC and Districts/ Borough	CIL Steering Group	Jointly funded study to ascertain viability of setting CIL rates across County
2012	WCC, Worcs authorities	Strategic Housing market Assessment SHMA	Jointly funded study on Strategic Housing Market Assessment. Stakeholder events including developers and RSLs.
9/05/12	Dudley/ South Staffs	DTC	Meetings of policy officers to discuss growth issues
June 2012	RBC, EA and ST	Level 2 SFRA	Joint Study
July/Aug 2012	RBC	DTC	RBC letter and response
8/08/12 ongoing	Birmingham CC	Unmet need	Various letters and meetings 3/3/14 – BDC response to the Birmingham Development Plan 2031 Pre Submission version 11/11/13 – BCC response on the Bromsgrove District Plan Proposed Submission Version 2011-2030 29/07/13 – BCC letter to BDC re Birmingham's Future Growth requirements 13/03/13 – BCC letter to BDC on Birmingham's Future Growth requirements 18/01/13 – BCC letter to BDC on Birmingham Future Growth Requirements 11/01/13 – BDC response to Birmingham Plan 2031 Options Consultation 08/08/12 – BCC letter to RBC on Birmingham's Future Growth requirements 18/03/11 – BDC response to Birmingham Core Strategy Consultation
2012	EA, EH, NE, WCC, developers	Green Infrastructure Concept Plan	Work to develop GI Concept Plan on Perryfields including meetings site visits etc
21/09/12	WCC Minerals	Minerals planning	Meetings and consultation involvement
21/02/13-ongoing	RBC	DTC	Letters re: DTC (see separate table)
Spring 2013	WCC, Worcs	Gypsy and	Jointly commissioned study to

	authorities	Travellers Accommodation Assessment(GTAA)	examine at future needs post 2013 (previous GTAA covers the period up to 2013)
06/13	RBC and infrastructure providers including utility companies	Draft Infrastructure Delivery Plan (IDP)	Joint collection of data from infrastructure providers. Joint Transport Section of IDP for both authorities.
19/2/14	Birmingham City Council	DTC	Meeting to discuss DtC strategic issues and procedures
November 2013 to February 2014	Wyre Forest DC, Redditch BC, Malvern DC, Worcester City Council and Wychavon DC	Jointly funded evidence base	Further work to update SHMA following SWDP EiP in October 2013. Including agreement of brief appointment of consultants etc
February 2014	Wyre Forest DC, Redditch BC, Malvern DC, Worcester City Council and Wychavon DC	DTC	Work to agree Statement on objectively assessed housing needs

Appendix A

Copies of Correspondence with Adjoining Planning Authorities

DRAFT



Mike Dunphy
Strategic Planning Manager
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

Please ask for: Kelly Harris

Direct Dial: (01902) 696317

Email: k.harris@sstaffs.gov.uk

29 August 2013

Dear Mr Dunphy,

South Staffordshire Local Plan 2006-2028 and the Bromsgrove District Plan 2011- 2030: Duty to Cooperate

Thank you for your letter dated 16th July 2013 regarding the preparation of your Local Plan and Duty to Cooperate. I concur with your view that at this point in time there are no strategic planning issues between our two authorities, but welcome the opportunity to maintain dialogue with you throughout the preparation of both our plans.

Yours sincerely

Kelly Harris
Local Plans Team Leader



100% Recycled



Direct Line : 01789 260399
Fax :
e-mail : dave.nash@stratford-dc.gov.uk
My ref :
Your ref : RW/DTC
Date : 18 July 2013

Mike Dunphy
Strategic Planning Manager
The Council House
Burcot Lane
Bromsgrove
B60 1AA

Paul Lankester
Chief Executive

Dear Mike

Bromsgrove District Plan 2011- 2030: Duty to Cooperate

Thank you for your letter dated 16 July.

I confirm that our previous discussions have identified two cross-boundary issues relevant to your Council and Redditch Borough Council, namely:

- 1) The "Eastern Gateway"- Winyates Green Triangle and Gorcott Hill
- 2) Housing in the vicinity of the A435 and Mappleborough Green to help meet the housing needs of Redditch.

My Council's Proposed Submission Core Strategy continues to make progress and, subject to a decision due to be made by full Council next Monday, we will shortly be carrying out a focused consultation on two key proposals that we wish to include in the strategy but upon which there has been no previous specific consultation. These involve a regeneration site in the town of Stratford-upon-Avon and a new settlement proposal within the M40 corridor between Leamington Spa and Banbury.

Our emerging plan incorporates proposals for the Redditch Eastern Gateway project and proposes the allocation of land for employment purposes at both Winyates Green Triangle and Gorcott Hill. It does not make any specific proposal for housing in the vicinity of the A435. There have been mixed messages concerning this issue, and to my mind there is no agreement about the role that any such development would play in meeting housing need.

Our current position is that there may be scope for some housing development along this corridor and within the Redditch Borough boundary, but that the scope on land within this District is very limited. It is constrained by landscape issues and the importance of retaining the identity and character of Mappleborough Green. We are proposing that the capacity for housing development in this vicinity will be assessed via our proposed Site Allocations DPD, but our current assumption is that development on land within this District will be limited and will be carried out to meet the housing needs of Mappleborough Green rather than Redditch.

Direct Line : 01789 260314
Fax :
e-mail : paul.harris@stratford-dc.gov.uk
My ref :
Your ref :
Date : 31 January 2014



Mike Dunphy
Strategic Planning Manager
The Council House
Burcot Lane
Bromsgrove
B60 1AA

Paul Lankester
Chief Executive

Dear Mike

Duty to Co-operate – including provision of housing

The District Council has just commenced a consultation exercise in which it is proposed to increase Stratford District's housing requirement to 10,800 dwellings for the period 2011-2031.

This is an appropriate opportunity to seek clarification and confirmation as to any cross-boundary issues of strategic importance that affect our local authority areas. Of particular importance is the need to ensure that our respective objectively assessed housing requirements, based on up-to-date evidence, are being adequately met.

It is my understanding that Bromsgrove District Council is not expecting Stratford-on-Avon District to accommodate any of its housing requirements. I would be grateful if you would confirm this is the case and that you don't anticipate the situation changing in light of any current assessment being undertaken by way of a Strategic Housing Market Assessment or similar study. I can confirm that it is the intention of Stratford District Council to meet all of its housing requirement without recourse to any neighbouring local authority area.

To date, no other strategic issues have been identified that need to be addressed between the two Councils, apart from the identification of land to meet the employment needs of Redditch. As you know, it is the intention of Stratford District Council to allocate in its Core Strategy sites at Winyates Green Triangle and Gorcott Hill for this purpose.

In preparing for our Examination in Public due to be held later this year, the District Council will be seeking a formal statement from your Authority confirming the situation.

I would be pleased to discuss these matters with you either face-to-face or on the telephone.

Yours sincerely

A handwritten signature in black ink that reads 'Dave Nash'.

Dave Nash
Policy Manager (Planning and Housing)



Elizabeth House
Church Street
Stratford-upon-Avon
CV37 6HX

telephone 01789 267575
minicom 01789 260747
website www.stratford.gov.uk
DX700737 STRATFORD-ON-AVON 2



Bromsgrove District Council
(For the attention of Mike Dunphy)
The Council House
Burcot Lane
Bromsgrove
B60 1AA

Jonathan Elmer
Principal Planning Policy Officer
tel: 01562 732552
fax: 01562 732556
email: jonathan.elmer@wyreforestdc.gov.uk
my ref: JE/HET/FP-NABROM
your ref: RW/DTC
date: 24 July 2013

By Email

Dear Mike

Bromsgrove District Plan 2011-2030: Duty to Co-operate

Thank you for your letter dated 16th July 2013 regarding Bromsgrove's District Plan. It is noted from the accompanying key diagram that the majority of sites proposed by Bromsgrove District Council do not have a strategic impact on Wyre Forest District and appear to be well related to existing settlements within Bromsgrove.

With regard to the Duty to Co-operate, your letter identifies that *"it is not considered that there are any strategic issues which need detailed co-operation at this point."* Wyre Forest District Council would concur with this assessment of the current situation with regard to Bromsgrove District's Plan and the relationship with Wyre Forest and its Development Plan. It is noted from your letter that Bromsgrove District Council is proposing to undertake an early review of the plan, including a Green Belt Review, to identify a further 2,500 houses to meet the identified need. Wyre Forest District Council looks forward to actively engaging with Bromsgrove District Council on this matter and providing comments accordingly.

Continued/...

Economic Prosperity and Place Directorate
Wyre Forest House
Finepoint Way
Kidderminster
Worcs DY11 7WF

Mike Parker, Director of Economic Prosperity and Place

Wyre Forest District Council continues to have active and positive dialogue with all our neighbours, including Bromsgrove District Council, through a number of well established groups and working parties. Additionally, we have a shared interest in the regeneration of our areas through the North Worcestershire Economic Development and Regeneration Service. This continued, pro-active collaboration between the two Councils helps to ensure that both authorities work together in a positive manner for the good of the area as a whole.

Yours sincerely



Jonathan Elmer
Principal Planning Policy Officer

DRAFT

Redditch Borough Council

Town Hall, tel: (01527) 64252
Walter Stranz Square, fax: (01527) 65216
Redditch, minicom: 695528
Worcestershire B98 8AH dx: 19016 Redditch



Councillor R. Hollingworth
Leader of the Council
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

Councillor Bill Hartnett
Leader of the Council
Redditch Borough Council

Thursday 5th July 2012

Dear Roger,

Duty to Co-operate – Bromsgrove District Council and Redditch Borough Council

The Localism Act (S. 110) inserted a new section into the Planning and Compensation Act 2004 (S. 33A) called the 'Duty to Co-operate'. The 'Duty to Co-operate' is a legal obligation, which requires local authorities to co-operate with each other in relation to planning for sustainable development, in particular the preparation of development plan documents relating to a strategic matter.

The Act defines a strategic matter (within subsection 4) as "*sustainable development or use of land that has or would have a significant impact on at least two planning areas*".

As you are aware, Redditch Borough's boundary is very close to the existing urban area, therefore restricting the capacity of the Borough to sustainably accommodate all identified development need within its boundaries. Redditch Borough Council considers that development need which cannot be accommodated within the Borough boundary could be sustainably located to the north/ north-west of Redditch, in Bromsgrove District, preferably contiguous to the boundary.

The Duty to Co-operate is a legal requirement of the plan making process. Both authorities must address the Duty in order for the two emerging plans to be found 'sound' at examination.

The National Planning Policy Framework (NPPF) (paragraph 181) states that '*Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination*'. In accordance with this, local authorities will have to provide evidence that they have complied with the legal duty. The Planning Advisory Service (PAS) has suggested that there are various forms of evidence that can be produced to demonstrate the compliance with the Duty to Co-operate including:

- Memorandum of understanding;
- Statement of common ground;
- Shared or common evidence bases;

- Agrees shared policies; and
- Joint plans

PAS advises that evidence should be as formal as possible and must be reasonable and proportionate.

It is important to address this issue as soon as possible in the plan making process. The Planning Inspectorate (PINS) has clearly stated that they are unable to assist Local Authorities in resolving problems with the Duty to Co-operate, and that all issues must be resolved before plans are submitted for examination. This is evidenced in their most recent involvement with the City of York Core Strategy. In this instance the Inspector felt that not enough work had been done to identify the cross boundary sites that would be critical to the delivery of the plan. As a result, the City of York intends to withdraw its Core Strategy in order to allow time to prepare the additional evidence required.

It is the intention of this letter to establish the first formal agreement of joint working under the new 'Duty to Co-operate'. It would be very helpful if you could respond in agreement to this letter in order to progress with the collation of joint evidence to underpin what I hope will be two 'sound' plans.

Please do not hesitate to contact me if you wish to discuss this further.

Kind regards

Councillor Bill Hartnett
Leader of the Council
Redditch Borough Council

DRAFT



**Bromsgrove
District Council**

www.bromsgrove.gov.uk

Our ref: RHWR

3rd August 2012

Councillor Bill Hartnett
Leader of Redditch Borough Council
Town Hall,
Walter Stranz Square,
Redditch
B98 8AH.

From the Office of the Leader of the Council
The Council House, Burcot Lane, Bromsgrove
Worcestershire B60 1AA
Telephone: (01527) 881400
Textphone: (01527) 881291
Fax: (01527) 881212
DX: 17279 Bromsgrove

Dear Bill,

Duty To Co-operate - Bromsgrove District Council and Redditch Borough Council

I write in response to your letter of the 5th July concerning the above.

Bromsgrove District Council is fully aware of its responsibility under the Duty to Co-operate introduced by the recent legislative changes, and with this in mind the Council will be happy to formally open discussions with Redditch Borough Council.

As you are aware, the issue of Bromsgrove District accommodating some of the growth needs of Redditch Borough within its administrative boundaries, is one which has challenged both Councils for a number of years without any resolution. Your request for joint working is a step closer to securing some certainty on this issue allowing both Councils to prepare and adopt sound development plans. As such Bromsgrove District Council officers have been instructed to continue working with Redditch Borough Council officers, in an attempt to find a mutually acceptable solution of accommodating the element of Redditch's growth needs which cannot be met within the Borough's boundaries.

I look forward to meeting to discuss the outcome of this work shortly.

Yours sincerely,

Clr Roger Hollingworth
Leader of Bromsgrove District Council





Bromsgrove
District Council

www.bromsgrove.gov.uk

From the Office of the Leader of the Council

The Council House, Burcot Lane, Bromsgrove
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Telephone: (01527) 881400
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Fax: (01527) 881212
DX: 17279 Bromsgrove

Our ref: RHWR

21st February 2013

Councillor B. Hartnett
Leader Redditch Borough Council
Town Hall
Walter Stranz Square
Redditch
B98 8AH

Dear Councillor Hartnett

I write concerning the duty to cooperate agreement reached between the Councils last summer, and the subsequent events that took place at the respective Council meetings this week.

In response to the decision taken by Redditch Borough Council on the 18th February not to endorse the housing growth material for public consultation, Bromsgrove District Council considered a revised recommendation at its Council meeting on the 20th February.

Firstly, I can confirm that Council approved the Housing Growth Consultation document and decided to proceed with public consultation on Sites 1 and 2.

Secondly, Members considered the position of the two Councils under the duty to co-operate imposed by the Localism Act, and agreed that Redditch Borough Council should be asked to re-consider its position regarding the public consultation on cross border growth as a matter of urgency.

It is the view of Bromsgrove District Council that the evidence prepared by a joint team of planning officers, and which supports the development areas identified in the consultation material, is robust, and in accordance with the decisions taken by the Bromsgrove Cabinet and the Redditch Executive does not warrant any further amendments before consultation with the public.

To that effect, Bromsgrove District Council has resolved to delay the publication of the consultation in order to give sufficient time for Redditch Borough Council to respond to this request. It is still the wish of Bromsgrove District Council to carry out a joint consultation with Redditch as we firmly believe this is in the best interests of the residents in our respective authorities, and also in accordance with the duty to cooperate and the best principles of successful plan making.

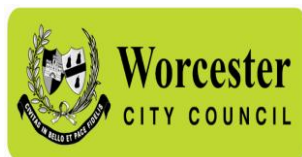
We hope that a positive response to this request will be forthcoming. However, in the event that Redditch Borough Council does not endorse the information for public consultation it is the intention of Bromsgrove District Council to publish this material on 1st April for a 6 week consultation period.

We look forward to your response and continued commitment to work together to achieve sound sustainable development plans for both Bromsgrove District and Redditch Borough.

Yours sincerely,

Cllr Roger Hollingworth
Leader of Bromsgrove District Council

DRAFT



24th September 2013

Your reference RW/DTC

Mr M Dunphy
Strategic Planning Manager
Planning and Regeneration
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire B60 1BJ

Dear Mike

Bromsgrove District Plan 2011 – 2013: Duty to Cooperate

Further to your letters of 16th July and 17th September 2013 I am replying on behalf of the South Worcestershire partner authorities with a response to the Duty to Cooperate consultation.

The South Worcestershire authorities welcome the opportunity to respond on this matter and I can confirm that we have been kept informed of the progress of the emerging Bromsgrove District Plan throughout formal consultations and via informal discussions between the authorities.

With respect to the preparation of the plan, the partner authorities are satisfied that there are no cross boundary matters of a strategic nature with respect to either sustainable development or the infrastructure requirements of South Worcestershire or Bromsgrove District which require a specific response in either the emerging Bromsgrove District Plan or the South Worcestershire Development Plan (SWDP).

In particular the partner authorities agree that, at this time, there are no identified and tested unmet needs arising from Bromsgrove District for which you are seeking provision in South Worcestershire. Similarly, the South Worcestershire authorities

through the SWDP are not indicating that there any strategic housing, employment or infrastructure needs arising in South Worcestershire which need to be accommodated in Bromsgrove District.

You will be aware that the South Worcestershire partner authorities have conducted a review of the Green Belt within our plan making area, which included testing whether this element of West Midlands Green Belt, continues to meet its intended purposes. As an adjoining authority with contiguous Green Belt designation you will be aware that the emerging SWDP does not propose any major revisions to the adopted Green Belt in South Worcestershire and none that directly affect Green Belt within Bromsgrove District.

The South Worcestershire Authorities have considered carefully the policies and proposals of the emerging SWDP and consider that any issues associated with these for Bromsgrove represent essentially local issues of a non-strategic nature.

However, the partner authorities are keen to recognise the close cooperation and engagement that has taken place between the authorities which has included:

- Joint commissioning of the Worcestershire Strategic Housing Market Assessment (2012) with an on-going commitment to support annual monitoring;
- Recent joint commissioning of a Worcestershire Gypsy and Traveller Accommodation Assessment to support development plan production across the county;
- Joint input to the Worcestershire Infrastructure Strategy which will establish a co-ordinated picture of county wide strategic infrastructure requirements;
- Production of the Worcestershire CIL Viability Study (January 2013) and joint liaison during its production;
- Input to the development of the Worcestershire Green Infrastructure Strategy and Action Plan
- Joint support for implementation of the Worcestershire Local Enterprise Partnership's priorities and objectives, as set out in the LEP Business Plan, including a commitment to bring forward the LEP's 'game changer' sites.

The South Worcestershire partner authorities are conscious that their work and the work of other prescribed bodies such as the Highways Agency has had regard to cross boundary implications arising from proposed development in both plan making areas with respect to potential impact on the M5 motorway and its junctions , in particular junction 5.

Consideration has been given to cross boundary issues through the preparation of Strategic Flood Risk Assessments for South Worcestershire and Bromsgrove District which have both had regard to the potential flooding effects of proposed development ensuring that any existing flood conditions in adjoining areas are not worsened through implementation of the emerging development plans.

Informal cooperation is also provided through the joint working of the Worcestershire Planning Officers Group (WOG), which has included providing joint representation at West Midlands regional planning events and meetings. This has recently included consideration at the Worcestershire level of joint input to the Greater Birmingham and Solihull Local Enterprise Partnership's (GBSLEP) proposal

to undertake a Housing Study for the GBSLEP, in which Bromsgrove District Council is also a partner.

On the basis of the above evidence the South Worcestershire partner authorities consider that the on-going requirements associated with the Duty to Cooperate have been and will continue to be met.

As the SWDP is about to enter the hearing phase of its preparation (starting 1st October 2013) it would be helpful if you could confirm your agreement with the description of the key activities undertaken.

Yours sincerely



Gary Williams
Head of Planning, Economy and Housing
Malvern Hills District Council
(on behalf of the South Worcestershire partner authorities)

DRAFT

South Worcestershire Development Plan

Duty to Cooperate Statement (CD 004): Supplement (February 2014)

South Worcestershire Councils and North Worcestershire Councils Objective Assessment of Housing Need

Context

- 1 The Worcestershire SHMA (2012) (CD 090) was submitted as part of the evidence base with the South Worcestershire Development Plan Submission Document (CD 001).
- 2 In his assessment of the evidence provided by CD 090 the Inspector considered that although the approach was generally sound, there were a number of data-related shortcomings in the document and further work should be undertaken on employment forecasting. Following the Initial Hearing sessions the Inspector helpfully outlined how he would like the SHMA revised in his letter (EX 400) and Interim Conclusions (EX 401). In identifying this way forward the Inspector invited the SWCs to provide an updated Objective Assessment of Housing Need (OAHN, “the study”).
- 3 In their Response to the Inspector’s Initial Conclusions (EX 407) the South Worcestershire Councils (SWCs) committed themselves to the provision of an updated OAHN by 31st January 2014.

Commissioning and conduct of the work

- 4 The SHMA (2012) had been prepared as a county-wide housing market area assessment to evidence the production of Local Plans across Worcestershire. Therefore, the South Worcestershire Councils identified the partial revision of SHMA for part of the county as a potential Duty to Co-operate matter and invited the north Worcestershire Councils to prepare jointly the project specification for the updated OAHN. This approach recognised that the update should be prepared in a consistent manner across the county of Worcestershire.
- 5 This resulting specification addresses a number of factors including:
 - The importance of CD 090 and the various underpinning scenarios to the evidence bases for the SWDP and Local Plans for the North Worcestershire Councils
 - Given the pan-County coverage of CD 090 it would be inevitable that the observations of the SWDP inspector would be raised in relation to Local Plans in the north of the County and therefore should be addressed as soon as possible

- The need to ensure continuing consistency across the neighbouring authorities in light of the plan examination process
 - The need to identify and address any potential cross-boundary implications arising from any updated scenarios, conclusions and recommendations in the report.
- 6 The Northern Districts accepted the invite to commission an update to the OAHN on a full cost-sharing basis. Prior to commissioning the work from Edge Analytics and Amion the Northern Districts were fully involved in the finalisation of the project brief and inception meeting of the study. There has been full co-operation between the Worcestershire Councils in the production of the updated evidence submitted to the SWDP hearing.
- 7 The work commissioned recognises that demographic and jobs change circumstances in the South and North of the County of Worcestershire vary. There is therefore in-built flexibility in both original and the updated studies to enable different scenarios to be applied on a sub-regional basis whilst employing the same core data and methodologies including sensitivity scenarios.
- 8 The limited window to undertake the partial updating of the SHMA (2012) has meant that updating has necessarily been carried out on a phased basis. At the time of writing the North Worcestershire Councils are finalising the north Worcestershire element of the study.
- 9 The Worcestershire Councils recognise that further work will be required by the South Worcestershire Councils to address any resulting uplift in the South Worcestershire housing requirement. However, there is general agreement that the level of potential of uplift suggested by the evidence submitted by the South Worcestershire Councils is unlikely to give rise to unmet housing need beyond South Worcestershire or any specific requirements for cross boundary development with North Worcestershire. There is however, an on-going commitment from the Worcestershire Councils to identify and address any significant strategic issues, in particular infrastructure requirements, which may arise from an increased housing requirement for South Worcestershire.

Further Work in Bromsgrove and Redditch Districts

- 10 Whilst the Worcestershire SMHA (2012) was based on the Worcestershire Housing Market Area it is accepted that there is a degree of overlap in North Worcestershire and specifically Bromsgrove and Redditch districts with the Birmingham metropolitan area housing market area.
- 11 Both Redditch and Bromsgrove Districts consider that further additional work will be required to supplement the 2014 Worcestershire study to address the

specific circumstances influencing housing requirements in these districts. Specifically, Redditch and Bromsgrove Districts intend to supplement the Worcestershire migration scenarios to consider the implications for housing need arising from internal migration within the Birmingham metropolitan housing market area (which includes Redditch and Bromsgrove Districts) and from potential unmet housing need arising from Birmingham.

12 The carrying out of supplementary work in Redditch and Bromsgrove Districts also recognises the participation of these Districts in the Housing Study currently being undertaken by the authorities within the Greater Birmingham and Solihull LEP area which will be reporting later in 2014 and its implications for plan making assessed in due course.

13 The Worcestershire Councils consider that, until the GBSLEP work is completed (anticipated mid-May 2014), it will not be possible to quantify any implications or any significant strategic issues for Worcestershire as a whole. There is an on-going commitment from the Worcestershire Councils to identify and address any significant strategic issues, in particular infrastructure requirements, which may arise from an increased housing requirement for the Greater Birmingham and Solihull LEP area. Any displaced housing need requirement implications for Worcestershire arising from the GBSLEP study will initially fall to those Worcestershire Districts with a primary housing market relationship with the GBSLEP study authorities. The SWCs (which are defined by GBSLEP as having a secondary relationship) will, through the on-going DtC process, continue to monitor the work being undertaken within the GBSLEP area and options to be generated for accommodating housing needs within that LEP area and exceptionally beyond it.

14 The Greater Birmingham and Solihull “Spatial Plan for Recovery and Growth” recognises that work on the preparation of individual development plans is at different stages and that there is no intention for the GBSLEP work to undermine local plans already at an advanced stage of preparation. It is understood by the Worcestershire authorities that the GBSLEP Plan, when finalised, will facilitate and accommodate the objectively assessed requirements of both the growing and diversifying economy of that area within the GBSLEP area, or exceptionally, by agreement in neighbouring areas. Consequently, the North Worcestershire Districts, and in particular Redditch and Bromsgrove Districts, will keep the position under review but are not, at present, identifying any additional significant strategic cross boundary issues beyond those already identified in earlier DTC statements submitted to the SWDP Examination.

SWDP Examination implications

15The Worcestershire authorities believe that there is nothing new arising from the South Worcestershire OAHN that would require any changes to the SWDP Examination Inspector's Interim Conclusions. They do however recognise, under the Duty to Cooperate, the need for ongoing liaison between relevant authorities regarding the scale and options for any potential unmet need.

DRAFT

08th August 2012

Ruth Bamford
Head of Planning and Regeneration
Redditch Borough Council
Town Hall
Walter Stranz Square
Redditch
Worcestershire
B98 8HA

Dear Ruth,

Birmingham's Future Growth Requirements

In December 2010, the City Council published a draft Core Strategy for consultation. The levels of housing and employment growth which this proposed drew on the Phase 2 Revision of the West Midlands Regional Spatial Strategy, and the technical work which underpinned this.

In the last 18 months much has changed:

- The Localism Act has confirmed the Government's intention to abolish the RSS.
- The National Planning Policy Framework requires Councils to plan to meet 'objectively assessed' needs for new housing and employment.
- The latest ONS population and household projections for Birmingham show higher levels of growth than those which informed the RSS Revision.
- Higher population growth and the impact of the recession highlight the need for more job creation.
- The first results of the 2011 Census have indicated that Birmingham's population in 2011 was about 40,000 higher than the mid-year estimates had suggested.

In the light of this, the City Council has embarked on a process of reviewing the growth levels that were included in the Draft Core Strategy and we hope to undertake further consultation on this towards the end of the year.

To help inform this process a new Strategic Housing Market Assessment (SHMA) has been commissioned. This work is not yet finalised, but the key emerging conclusions were presented at a stakeholder workshop at the end of May which was attended by many authorities adjoining Birmingham. The message from the SHMA research is that Birmingham's housing requirement for the period 2011 – 31 is in the range of 80,000 to 105,000. This compares to the latest estimate of capacity within the urban area (from the City's 2011 Strategic Housing Land Availability Assessment) of around 43,000.

Clearly this creates a significant challenge. We are considering a number of ways to increase capacity within the urban area – but it is already quite clear that there is no prospect that these will bring us even close to the lower end of the housing requirement range. The only remaining course will then be to consider green belt development options on the edge of the city. However the scope for such options within Birmingham is limited.


Our approach has always been to accommodate as much of Birmingham's housing growth as realistically possible within the city's boundary, and this remains our intention. However, it is increasingly clear that over the next twenty years it will not be realistic for us to provide for the full quantity of new housing that the SHMA indicates that we require.

In these circumstances it is likely that we will need to look to adjoining areas to accommodate some of Birmingham's requirement. I appreciate that this is a challenge, particularly in view of the advanced stage that many of us find ourselves in with our individual development plans.

I am therefore writing to you to propose that we meet to discuss these issues and resolve a way forward in addressing them. The existence of the West Midlands Joint Committee and the now established LEPs are valuable structures that emphasise the importance of joint working to meet shared priorities and pressures. However, due to the pressing nature of these issues I suggest that as Chief Planning Officers we arrange to meet to discuss the matters outlined above to set the context for these ongoing discussions.

I would be very pleased to host the meeting in Birmingham and if you could advise Pauline Grey my secretary of your availability from the beginning of September I will make the necessary arrangements.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Waheed Nazir', written in a cursive style.

Waheed Nazir
Director of Planning and Regeneration



Waheed Nazir
Birmingham City Council
Planning and Regeneration
PO Box 28
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Planning and Regeneration

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Your Ref: DPD/Plan2031/Stat
Our Ref: 6-18.5

11th January 2013

Dear Waheed

Birmingham Plan 2031 Options Consultation

Thank you for consulting Bromsgrove District Council on the Birmingham Plan 2031 options consultation.

The District Council broadly agrees with the overall strategy being put forward by the City Council, particularly the focus for both new housing and employment development to be prioritised towards brownfield land in the first instance.

The housing figures contained within the document are noted and we welcome the proposals for the efficient use of land by requiring development to be a minimum density of 40 dwelling per hectare.

It is also recognised that there is a shortfall of available land for approximately 30,000 new houses, which requires development to take place on land that is currently green belt. However what is not clear is how the 30,000 shortfall is to be made up, if only 5000 -10,000 houses are to be provided on Green belt sites within the City boundary. The document refers to the possibility of providing land for the development needs of the city outside of the City boundary, but offers no clear indication of where, when, and how the City Council envisages this development taking place. More clarity on the element will be essential if Districts such as Bromsgrove are to fully engage in the plan making process the City Council is undertaking, and to ensure the requirements of the duty to cooperate are met. It is acknowledged that early discussions have taken place between the two authorities and we welcome the opportunity for continued constructive dialogue in the future.

We would like to take this opportunity to reinforce the fact that Bromsgrove District Council are currently in the advanced stages of preparing its District plan with the publication and submission versions due for release later this year. Due to the advanced nature of our plan it is difficult for new issues to be incorporated without introducing significant delays into the process, which as you are aware is contrary to the wishes of the Government for all local authorities to have an up to date plan in place as soon as possible.

The Green Belt sites proposed are supported by the District Council as suitable locations for urban extensions. We do have concerns about the self imposed limit of only suggesting that 5000 - 10,000 houses or 50 hectares of employment land is the maximum amounts these sites can accommodate in the plan period. It is accepted that it is a challenging market for development at the moment, but over the lifetime of the plan it is expected that this will change. Specific market analysis for this location will be required to support the assumption that 10,000 houses and or 50 hectares of employment is the upper limit of growth that can be sustained in this area of the city over the plan period. The District Council will be keen to see the City utilise all its own options fully before any expansion beyond the City boundaries is considered.

In relation to the previous point made, the ruling out of a number of green belt sites because they are too small to fit into the sustainable urban extension category is short sighted and not supported. It is important that the City Council make the most of every opportunity available to them. These sites could make a valuable contribution to the overall housing supply and help to support local facilities in these areas, it is essential that these sites are considered more fully as the plan progresses.

The Council are pleased to see Longbridge maintained as a key focus for the City Council and support its continued inclusion in the plan making process. The inclusion of an element of the land covered by the Longbridge Area Action Plan (AAP) as an ITEC park is acknowledged. However it is important to the District Council that the proposals contained in the AAP continue to be the starting point for considering development in this location. The Aims of the AAP in securing a sustainable community for the future with 10,000 new jobs created in a range of different sectors must not be lost. The over reliance on one business sector for jobs must be resisted, and the opportunities for providing a range of employment at Longbridge must continue to be explored.

It should be noted that these are officer comments only and do not have any formal political endorsement from Bromsgrove District Council.

Please feel free to contact me should you have any queries with the content of this letter, and we look forward to continuing working together on plan making activities for both authorities.

Yours Sincerely



Mike Dunphy
Strategic Planning Manager



Mr Waheed Nazir
Director of Planning & Regeneration
Birmingham City Council
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Ref: JS/rb

1st March 2013

Dear Waheed,

I refer to your letter of the 18th January 2013 and the subsequent discussion on the 22nd February involving the Leaders of both Councils.

As already confirmed in this Council's response to the Birmingham Plan 2031 Options Consultation, Bromsgrove District Council (BDC) is fully committed to collaborative working with the City Council on strategic planning matters where such a need has been identified.

The problem you face in addressing the likely shortfall of land supply in Birmingham is acknowledged, but this Council believes that further work needs to be undertaken to establish if any of the shortfall should or could be located within Bromsgrove District. The completed Strategic Housing Market Assessment (SHMA) for Birmingham is clearly an important piece of evidence although it must be considered alongside the assessment completed for Bromsgrove. The Birmingham City SHMA acknowledges that BDC housing requirement, as informed by the Worcestershire SHMA, is already made up of a significant proportion of needs arising from the city and again, it is our view that this relationship should be examined more closely to establish any further requirements in Bromsgrove.

The Commissioning of a SHMA for the GBSLEP and / or the West Midlands Joint Committee Area could be a mechanism which will allow for all the various assessments produced by authorities across the West Midlands to be brought together to provide a coherent overall picture. Subject to the agreement of the other partner authorities we would welcome the opportunity to discuss this and in particular the time period this assessment is intended to cover and how it would feature in the plan preparation work currently being undertaken at district level. I should stress that we would seek to build on the substantial work that has already been carried out across the region to establish objectively assessed housing requirements rather than simply repeat such work.

You will be aware that this Council is in the advanced stages of preparing its District Plan. The NPPF stresses the desirability of local planning authorities having up-to-date plans in place and subject to the consultation on housing growth for Redditch progressing satisfactorily, we will progress to the final stages of plan preparation by the end of this year. Following a meeting with PINS in April last year to discuss plan preparation for Redditch and Bromsgrove, we identified a clear path to develop both plans in parallel with a firm commitment to a joint Green Belt review at an appropriate later stage. In this respect, I welcome your comments that you do not wish to jeopardise local planning work which is already well-advanced.

Without repeating our previous comments provided on the BCC Options Consultation, further clarity will need to be provided by the City Council on its own development strategy for land within its boundaries before meaningful discussion can begin on any future Green Belt reviews outside the City. If a future review and subsequent land release is required, this will need to form part of a development plan review as stated in your letter of the 18th January. This review would need to be undertaken collaboratively and to an agreed methodology and assess all of the options for development that exist on the city's boundaries. Bromsgrove will be undertaking a Green Belt review to establish the most sustainable locations for the remainder of its housing allocation up to 2030 and it is suggested that should any land be required in Bromsgrove to meet Birmingham's needs then it is through this mechanism that the two authorities work together. This approach would accord with the guidance in the NPPF which requires authorities to plan positively to meet the development needs of their area whilst acknowledging the policy restrictions which apply to development in the Green Belt and which are still fully recognised in the NPPF.

I understand that the City Council has a significant land holding in Bromsgrove which would be covered by any Green Belt review. Should such land prove to be the most sustainable option for growth, then this Council would look forward to bringing these areas forward for development in a manner which benefits the residents of both Councils. However, until such time as a Green Belt review is completed or sufficiently advanced, this Council would resist speculative planning applications to ensure land is released in a controlled way and to maintain transparency of approach.

We look forward to hearing that the City Council is committed to working alongside the District Council in this manner. We would also suggest that a regular series of meetings is scheduled for relevant officers from both authorities to continue the meaningful dialogue that currently exists.

Yours sincerely,

John Staniland
Executive Director
Planning & Regeneration, Regulatory and Housing Services

Ruth Bamford
Head of Planning and Regeneration
Bromsgrove Borough Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

Date: 29.07.13

Dear Ruth,

Birmingham's Future Growth Requirements

It is now almost a year since I first wrote to you to draw attention to the challenge that Birmingham faces in meeting its future requirements for new housing.

I believe that we have made significant progress over the past 12 months in developing an approach which will enable this challenge to be addressed in a planned way, and I am grateful for your support in taking this forward

You will recall that at the end of last year the City Council undertook a further round of consultation on options for increasing the supply of land for housing and employment development within the city boundary, including a consideration of green belt options. This consultation generated a substantial number of comments, and we have subsequently commissioned additional technical work in response to this.

This work is now nearing completion, and the next step in the process will be the publication of the pre-submission version of the Birmingham Development Plan. We expect to secure Council authorisation for this in the autumn.

We are, of course, already taking into account any comments that your Council made at earlier stages in the process – but I would like to provide you with a further opportunity to raise with us any issues that you feel that we need to take into consideration in finalising the Plan. In this respect I am conscious that our focus over the past 12 months has been very much on the housing challenge, and that there may be other issues of importance that we also need to consider. I have attached a checklist of matters that may be of common concern and if there are any outstanding concerns I would be grateful if you could identify them.

As ever, we would be happy to meet with you to discuss any issues or concerns that you may have. If you would like to meet in the first instance please liaise with David Carter, Head of Planning and Growth Strategy (email: david.r.carter@birmingham.gov.uk tel: 0121 303 4041)

Yours sincerely



Waheed Nazir
Director of Planning & Regeneration

Birmingham City Council

Checklist of matters which you may be of common interest and which reasonably might be covered by the Duty to Co-operate.

1. Overall approach including the relationship to urban and rural renaissance
2. Estimation of housing requirements and the level and distribution of housing provision
3. Appropriate provision made for migration
4. Level and distribution of employment land provision
5. Level and distribution of office provision
6. Level and distribution of retail provision
7. Appropriate provision made for public and private transport including Park & Ride and commuting patterns
8. Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure
9. Green Belt matters
10. Minerals, waste and water resources including flooding
11. Air quality matters
12. Any other matters that might reasonably identified.



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22nd August 2013

Dear Waheed

Thank you for your letter of the 29th July concerning Birmingham's future growth requirements. The Council agrees that significant progress has been made on this issue, and will continue to support the City Council in taking this issue forward in a manner which is advantageous to the successful adoption of both authorities development plans in the near future.

We would be grateful to discuss this issue further particularly the outcomes of the consultation and how this has informed the further work you are undertaking. Bromsgrove District Council is also keen to see any response you have in relation to the comments the Council submitted as part of this consultation process.

We also acknowledge that the issues facing planning across the region are wider than just housing supply, and we would welcome the opportunity where appropriate to discuss the other issues you have on your checklist provided with the letter. Bromsgrove is in a similar position as The City Council in relation to plan making, with a proposed submission draft plan to be published in September with likely submission date of December. With that in mind we would like to meet with as soon as possible in order to address any outstanding issues, and ensure that they are taken into account in the both authorities development plans as they progress towards examination and adoption.

As requested we will contact David Carter and arrange to meet shortly to share any further relevant information and continue the discussions.

Yours sincerely

Ruth Bamford
Head of Planning and Regeneration
Redditch Borough and Bromsgrove District Councils

March 2014

BIRMINGHAM DEVELOPMENT PLAN

Duty to Co-operate

Local Planning Authorities and other bodies party to this agreement/ understanding:
A. Birmingham City Council (BCC) B. Bromsgrove District Council (BDC)

Development Plan Document(s) covered by this agreement / understanding:
Birmingham Development Plan

Stage in the process forming part of this agreement:
Pre-Submission* *NB: In the event of any changes to the plan prior to submission and/or as part of modifications proposed during the Examination process then updated versions of this document may be prepared.

Checklist criteria NB: this is a starting point, list to be mutually agreed between the parties to this agreement. Checklist discussed and agreed: Yes/ No	Summary status E.g.: Full or partial agreement, / Shared understanding on area(s) of disagreement, or/ Not applicable Delete as appropriate	1. Summary of the approach in the plan 2. Summary of agreed position and any outstanding concerns or other comments NB: Refer to attachments and appendices if required
a) Overall approach incl. relationship to urban and rural renaissance	Agreed	<p>1. The vision, strategic objectives and approach set out in the BDP envisages that by 2031 Birmingham will be renowned as an enterprising, innovative and green city that has delivered sustainable growth meeting the needs of its population and strengthening its global competitiveness.</p> <p>Following around half a century of decline in the latter half of the C20 the city's population is expected to grow rapidly extending and building on the success of the strategy for urban renaissance that has been the hallmark of planning in the city since the 1980's.</p> <p>2. Following abolition of the Regional Spatial Strategy the City Council has worked and continues to work with adjoining authorities in the GBSLEP and West Midlands Metropolitan Area and beyond not only to ensure the</p>

		<p>continuing success of urban renaissance but also, through the GBSLEP Strategic Spatial framework Plan, the Strategic Policy Framework for the West Midlands Metropolitan Area and local plans, to ensure that there remains an appropriate balance between growth and development to meet needs in both urban and rural areas. There are no outstanding issues in relation to the strategy set out in the BDP between the parties signatory to this document.</p>
<p>b) Estimation of housing requirements and the level and distribution of housing provision</p>	<p>Agreed</p>	<p>1. The Birmingham SHMA which underpins the BDP estimates a housing requirement of c80,000 net new dwellings in the period up to 2031. The 2012 SHLAA's best estimate of likely capacity without incursion into Green Belt (except at the site of the former Yardley Sewage Works) and including an allowance for c700 on land at Longbridge within Bromsgrove District is c45,000 dwellings, including allowance for windfalls. The Pre-submission version of the BDP proposes that 51,100 net new dwellings - should be provided including the removal of land from the Green Belt to increase capacity within Birmingham leaving a balance to be found outside the city's boundary of c29,000 dwellings.</p> <p>2. The major issues concern the scale of the housing requirement, the extent to which capacity exists or can be identified within Birmingham's boundary and then the scale and distribution of any resultant shortfall. The BDP sets out Birmingham City Council's position in respect of these matters and it is envisaged by the parties signatory to this document that the satisfactory resolution of these issues will be achieved through (1) completion of the GBSLEP Strategic Housing Needs Study (2) Distribution of the overall housing need and the resultant 'overspill' housing through the Second Iteration of the GBSLEP Strategic Spatial Framework Plan and through arrangements negotiated with other authorities beyond the GBSLEP as justified by the evidence and (3) Subsequent accommodation of the 'overspill' growth in the review of Local Plans in adjoining areas*. This approach is accepted by the parties signatory to this document.</p> <p>*Does not just include authorities sharing common boundaries.</p>
<p>c) Appropriate provision made for migration</p>	<p>Agreed</p>	<p>1. The Birmingham SHMA takes account of migration in establishing the overall housing requirement and, broadly speaking, the effects of migration trends are then taken into account in the estimation of housing requirements in</p>

		<p>adjoining areas through the preparation of local plans.</p> <p>2. The identification of a housing shortfall or 'overspill' requirement refers to potential additional housing over and above that included in population and household projections that is needed outside Birmingham's boundary in order that housing needs can be met. The process for resolution of this matter is as set out in b)2 above. This approach is accepted by the parties signatory to this document.</p>
d) Level and distribution of employment land provision	Agreed/	<p>1. The BDP identifies a serious emerging shortfall of land to accommodate future employment growth and investment. The plan addresses this issue by protecting the city's core employment areas from competing uses so they offer a continuing supply of recycled land supplemented by the release of a major new employment site (80ha) at Peddimore. Proposals for six economic zones are primarily focussed within the existing employment areas and include two Regional Investment Sites. The possible longer-term need for further strategic employment sites is to be addressed by the GBSLEP Spatial Plan for Recovery and Growth and associated technical work with adjoining LEPs.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
e) Hierarchy of centres and the level and distribution of retail provision	Agreed/	<p>1. The BDP defines a retail hierarchy of centres in Birmingham. The approach in the BDP is to make provision for a net increase of 270,000 m² in comparison retail floorspace concentrated in the City Centre, Sutton Coldfield town centre and three District Growth Points. Growth elsewhere will be small scale.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
f) Level and distribution of office provision	Agreed/	<p>1. The approach in the BDP is to encourage 745,000 m² gross of new office development in the network of centres primarily focussed in the city centre including a substantial proportion of the new office floorspace expected to be provided within the Enterprise Zone.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>

<p>g) Appropriate provision made for public and private transport including Park & Ride and commuting patterns</p>	<p>Agreed/</p>	<p>1. The BDP incorporates a range of transport policies and proposals across all modes. These are consistent with the extant Local Transport Plan and emerging Birmingham Mobility Action Plan (BMAP). There are proposals to improve networks both within and beyond the boundary which will impact, for example, on modal choice for commuters. Major development proposals close to the city boundary have impacts that can extend across the administrative boundary. Close cross-boundary co-operation on transportation matters continues through both West Midlands Shadow ITA and the associated Local Transport Boards (LTB).</p> <p>2. There is no desire to increase the levels of in-commuting across the city boundary so there is an expectation that there will be a broad balance between the levels of housing and employment growth taking place in areas beyond the city boundary which is a matter to be addressed in the relevant local plans. This approach is accepted by the parties signatory to this document.</p>
<p>h) Consistency of planning policy and proposals across common boundaries such as transport links and green infrastructure</p>	<p>Agreed/</p>	<p>1. To be identified and discussed as appropriate across common boundaries but would include matters such as landscape, designations of natural areas, river basin management and transport networks.</p> <p>2. Both authorities recognise and accept the need for continuing liaison on the cross-boundary implications for transport networks within Bromsgrove arising from growth within Birmingham. Not aware of other specific current green infrastructure or cross boundary issues.</p>
<p>i) Green Belt matters</p>	<p>Shared Understanding/</p>	<p>1. Significant changes to the Green Belt are proposed in association with major development proposals at Langley and Peddimore to the north-east of Birmingham and at the site of the former Yardley sewage works. The changes to the Green Belt boundary have been made in such a way as to identify new boundaries that will endure in the long-term and allow for development to be accommodated that will not undermine the essential purposes or integrity of the wider West Midlands Green Belt. The City Council acknowledge that additional land which is currently designated as Green Belt in adjoining areas may need to be identified for development – as a consequence of the process to determine the level and distribution of future growth set out under b)2 above - but the responsibility for those proposals, should they arise, will lie with the</p>

		<p>respective local planning authority (working collaboratively with other relevant authorities) to be determined through a review of the relevant local plan(s).</p> <p>2. This approach is noted by the parties signatory to this document. Bromsgrove would request that the emphasis of policy TP27 in the Birmingham plan is carried forward when also considered land outside of the City Council area.</p>
j) Minerals, waste and water resources including flooding	Agreed/	<p>1. As a major city Birmingham is reliant on minerals predominantly produced in adjoining shire areas to help facilitate its growth and development. The City Council recognises that it can reduce the demand for mineral extraction through effective recycling and reuse of building materials and aggregates. Similarly the City Council recognises that its 'footprint' can be reduced through self-sufficiency and vigorous adoption of the waste hierarchy. The City Council is an active member of both the West Midlands Aggregates Working Party (AWP) and the Regional Technical Advisory Body (RTAB) covering waste. Both groupings help ensure discharge of the DtC. In respect of water resources and flooding the City Council is fully aware of its responsibilities and will vigorously pursue the principles of sustainable drainage to reduce the risks of flooding both within the city and beyond its boundaries.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
k) Air quality matters	Agreed/	<p>1. The City Council is committed to the improvement of air quality for its residents and those in surrounding areas. It is, and will remain an active participant in initiatives to address these matters jointly with adjoining authorities and other agencies subject to the nature of actions being consistent with the city's aspirations for growth. Detailed policies on air quality and noise matters will be set out in a separate Development Management DPD.</p> <p>2. This approach is accepted by the parties signatory to this document.</p>
l) Any other matters that might reasonably be	Agreed/	<p>1. No other matters identified.</p> <p>2.</p>

identified under the Duty to Co-operate		
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Log of meetings, reports and other records to substantiate the collaborative working:

	Details:
Meetings	Meetings on the Birmingham Development Plan held on 2/11/12 and 18/02/14.
Groups	Regular meetings: (1) GBSLEP Planning Sub-Group (2) GBSLEP Spatial Planning Group (3) Development Management Group (4) West Midlands Planning Officers Group – Worcestershire LPAs connect to the group through the Worcestershire Planning Officers Group
Responses to consultation and correspondence	25/2/14 BDC response to the Birmingham Development Plan 2031 Pre Submission version 11/11/13 – BCC response on the Bromsgrove District Plan Proposed Submission Version 2011-2030 22/08/13 - BDC letter to BCC re Birmingham’s Future Growth requirements 29/07/13 – BCC letter to BDC re Birmingham’s Future Growth requirements 13/03/13 – BCC letter to BDC on Birmingham’s Future Growth requirements 18/01/13 – BCC letter to BDC on Birmingham Future Growth Requirements 11/01/13 – BDC response to Birmingham Plan 2031 Options Consultation 11/01/13 – BDC response to Birmingham CIL consultation 08/08/12 – BCC letter to BDC on Birmingham’s Future Growth requirements 18/03/11 – BDC response to Birmingham Core Strategy Consultation
Additional points	

We, the undersigned, agree that the above statements and information truly represent the joint working that has and will continue to take place under the ‘Duty to Co-operate’.

Authority A*

Authority/ Organisation B (& C, D etc)*

* Must be signed by either Council Leader or responsible Cabinet Member or responsible Chief Executive or Chief Officer only. For non-local authority organisations signatory should be at equivalent level.

We will consider reasonable requests to provide this document in accessible formats such as **large print, Braille, Moon, audio CD or tape or on computer CD**

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"انگریزی میں مدد چاہتے ہیں؟" ورسیسٹر شائر ہب [HUB]، برومزگرو [Bromsgrove] میں 01527 881288 پر رابطہ کریں



Bromsgrove
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