

Mr D Hobbs
Senior Planning Officer
Development Services
City of Worcester
Orchard House Farrier Street
WORCESTER WR1 3BB

Western Division

5 St. Philip's Place
Colmore Row
Birmingham
B3 2PW

Your Ref: PLAN/DMH/DB 428.9
Our Ref: GOWM/WPT/P5248LDF/54940

Direct Line: 0121 352 5482
Fax No: 0121 352 5188
e-mail:
mike.price@gowm.gsi.gov.uk

Date: 8th December 2005

Dear Mr Hobbs

BALANCED HOUSING MARKETS DPD - ISSUES REPORT

Thank you for sending a copy of the above document to the Government Office for the West Midlands. I have noted that consultations on the Issues Report are part of the process of ongoing engagement in the production of the Balanced Housing Markets, Development Plan Document.

There are a number of comments and suggestions which you should take into account as you prepare the DPD for submission to the Secretary of State.

Process and Community Involvement

It is difficult to tell from the Introduction to the Issues Report at what stage the consultations are being carried out, Regulation 25 or Regulation 26. Paragraph 1.3 refers to "consultation and involvement before redrafting and then formal submission". This could be interpreted as being public participation on preferred options. I note that the position is made clearer at the end of the Document in the section on Public Involvement/Timetable. It is important at all stages in the preparation of a DVD, particularly for community involvement, that people are aware of the stage reached and what other opportunities they will have to become involved in the preparation of the Document.

It is suggested that a brief paragraph is included in the Introduction, outlining the stages of preparation of the DPD. To illustrate the process, an adaptation of Figure 4.1 in PPS12: "Local Development Frameworks" may be helpful.

A second point on the matter of consultation is that in order to provide evidence of the extent of consultations it would be beneficial for you to include a list of consultees

and methods of engagement as an appendix. This would be helpful in the long run in providing evidence of community engagement and that the "tests of soundness" are being met.

Overall, it is considered that the document identifies the main issues but there are a number of points which you should consider.

Issue 1: Land Supply

The context for discussing land supply in the Issues Report is stated as the Structure Plan. The DPD should be prepared in relation to the Regional Spatial Strategy and the housing requirements it contains.

In dealing with housing land supply and allocations, the base date should be 2001 as set out in a letter from Government Office to local authorities earlier this year.

Issue 7: Private Rented Stock

The matter of the achievement of the Decent Home Standard is covered to some extent in this issue, however it does not appear elsewhere, particularly in relation to the social sector. On a related matter, there is no reference to a housing conditions survey which might influence the development of housing policy.

Issue 8: Market House Prices

Whilst DPDs are required to be spatial and not confined to land use allocations, the inclusion of an issue related to the setting of council tax may be considered to be beyond the scope of the DPD.

Issue 14: Gypsies and Travellers

I am pleased to see that the issue of considering the needs of gypsies and travellers is included in the Issues Report.

Sustainability

It is noted that the City Council will produce a sustainability appraisal for the DPD and that the four main objectives are taken from the UK Strategy for Sustainable Development. Has a scoping study been carried out and consulted upon prior to the consultations on the Issues Report? There is a requirement to undertake a sustainability appraisal of the issues and options and this should inform decision making as the authority moves towards preferred options. You should be aware that Guidance for local planning authorities on Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents was published by ODPM in November 2005.

Thank you once again for consulting the Government Office for the West Midlands on the Issues Report. I hope that these comments are helpful as you develop the Balancing Housing Markets DPD. Please contact me on the above telephone number or e-mail address if you wish to discuss any of the comments in further detail.

Yours sincerely

MIKE PRICE
Senior Planning Officer
Western Division (Planning and Transport)