

EXAMINATIONS OF THE BROMSGROVE DISTRICT PLAN (BDP) AND THE
BOROUGH OF REDDITCH LOCAL PLAN No 4 (BORLP4)
INSPECTOR'S NOTE TO BROMSGROVE DISTRICT COUNCIL AND
REDDITCH BOROUGH COUNCIL – 26 March 2014

1. Although I am only at an early stage in my preparatory work, I have identified a matter that potentially involves a serious soundness concern in respect of both examinations.
2. Paragraph 47 of the National Planning Policy Framework (the Framework) states that to boost significantly the supply of housing, local planning authorities should (among other matters) use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework.
3. The housing needs identified in both Local Plans derive from the Worcestershire Strategic Housing Market Assessment (February 2012) (the SHMA). However, as you are aware, the Inspector in the examination of the South Worcestershire Development Plan (SWDP) raised concerns about a number of aspects of the SHMA's methodology. These are set out in his 'Interim Conclusions on the Stage 1 Matters' paper dated 28 October 2013. Further work was carried out for the South Worcestershire Councils (SWCs) in response to those concerns: this is contained in the Amion Consulting Ltd paper (January 2014)¹. For reasons of transparency, both of these documents should be added to the present examination libraries.
4. I note that the North Worcestershire Councils (NWCs²) requested new trend-based demographic scenarios in response to the SWDP Inspector's concerns. These are set out in the draft Edge Analytics Ltd report dated March 2014³. However, the status and scope of this report, which does not appear to have been finalised, are uncertain. Specifically, and irrespective of the merits of the revised scenarios that have been tested, **it is unclear from the draft report how the updated evidence has affected the Councils' consideration of the objectively assessed housing needs within their respective areas.** The SWDP Amion Consulting Ltd paper reached a conclusion on housing needs, effectively stating a view as to which of the tested scenarios represented the most realistic assumptions currently available⁴. However, this approach is not followed by the draft Edge Analytics Ltd report, which sets out the results of a suite of scenarios, containing a range of outputs, without identifying which (if any) represents the best estimate of objectively assessed housing needs for the Council areas concerned.
5. In the Bromsgrove examination, the draft Edge Analytics Ltd report is accompanied by a short 'Explanatory Note'⁵ which states that: 'The range of scenarios produced within this report provides further evidence to justify the Council's housing requirement of 7,000. The Council considers that this figure represents the full objectively assessed need for housing'.

¹ South Worcestershire Councils: South Worcestershire Development Plan: Objective Assessment of Housing Need (January 2014) Amion Consulting Ltd.

² Bromsgrove DC, Redditch BC and Wyre Forest DC.

³ Bromsgrove document CD7.3; Redditch document CD7.1.

⁴ See paragraphs 4.7-4.8 of the Amion report, which propose an increase in the overall dwelling requirement for the SWCs.

⁵ This Explanatory Note should also be made available on the BDP examination website.

However, the three core jobs-led scenarios in the draft Edge Analytics Ltd report all suggest annual dwelling requirements in excess of that implied by the BDP's 7,000 dwelling target. Higher requirements also arise when the job-led scenarios are tested with varying household formation rate assumptions and modified assumptions on economic activity rates and unemployment rates (Sensitivity Scenarios 1, 2 and 3). The justification for the Council's statement is therefore unclear.

6. Given the requirements of the Framework, notably at paragraph 47, it is necessary that the objectively assessed housing needs in respect of both Local Plans are explicitly stated and robustly justified. The assumptions that underpin the proposed dwelling requirement figures should be clear from the supporting evidence base.
7. **Please give these comments your urgent consideration and provide me with a written response.** I will then reach a view on how the examinations should proceed. Potentially, this could involve holding a joint exploratory meeting (which would be procedural only, with no testing of evidence) or the setting up of one or more joint hearing sessions to consider this matter (and potentially other matters) in advance of the main body of hearings.
8. I look forward to hearing from both Councils with some urgency. If you have any queries about this note, then please contact me via the Programme Officer.

Michael J Hetherington
Inspector
26 March 2013