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From: Nigel Gough <ngough@nigelgoughassociates.co.uk>

To: progofficer <progofficer@aol.com>

Sent: Mon, 12 May 2014 16:56

Subject: Bromsgrove District Local Plan & Redditch Local Plan Examinations

Dear Mrs Wilson

On behalf of our Clients listed below, we set out our comments on the draft Matters, Issues and Questions Paper as well as the reference to the draft Hearings Programme.

### **Initial Sessions - overarching non-site specific matters**

We have submitted a separate paper requesting an Initial Session to consider the Economic Strategy / proposals in respect of the Bromsgrove Local Plan, more particularly that there is no proper sound Economic Base and

Strategy adopted by Bromsgrove for their Local Plan as required by the NPPF to underpin their Plan and in particular to input into the provision of an objectively assessed housing requirement figure. It is the lack of an objective and robust Economic Strategy and policies that should, in our opinion, be dealt with at an Initial Session.

### **Main Sessions**

In the event that the Inspector does not accord time and an opportunity to consider the Economic Base and Strategy relative to the Bromsgrove Local Plan in an Initial Session, then it is our belief that there should be a Main Session at the start of the Main Hearing Sessions covering this fundamental lacking in the Plan making it, in our view, unsound and, in our submission, unable to be made sound without a substantial further input and a Major Modification of the Plan at this stage. It is fundamental that there is no input into this Plan relative to the Greater Birmingham and Solihull LEP and its Strategic Economic Plan bearing in mind the weight that should be attached to this document in terms of the Bromsgrove Local Plan.

### **Matter 01 - Objectively Assessed Housing Need**

We would submit that there needs to be another question referring to the lack of a sound strategic Economic Base and policy to assist and inform the housing strategy and housing policies in order to provide an objectively assessed housing need. There needs to be reference to South Worcestershire Development Plan, a neighbouring Plan, where their strategy should be consistent with Bromsgrove's and where the base information underpins South Worcestershire's growth strategy which again should be consistent across the authorities or, if not, there need to be sound reasons why not because, if not, then the Bromsgrove Local Plan cannot be both robust and sound.

### **Matter 02 - Duty to Co-operate and Future Housing Needs from the Major Urban Areas**

Cross boundary discussions have been assumed to take place between Bromsgrove and Birmingham and it is extremely well known that there will have to be substantial housing allocations in Bromsgrove to support the housing needs for the City of Birmingham. The City of Birmingham Development Plan is due for submission to the Secretary of State in September, effectively at the same time as the Main Hearings. The Bromsgrove Plan could be judged unsound if the considerations for this cross boundary housing need are not taken

into account, particularly because of the need for a full Green Belt review at this stage, and the need for housing and economic support by these two adjoining local planning authorities. There are such important aspects in this matter that it goes to the heart of proper and sound Development Plan making, as referred to in the paper from PSL Research Ltd which you already have before you. To seek to move this Plan towards Approval knowing that there is a requirement for substantial provision in Bromsgrove for the City at this time without proper consideration, brings into jeopardy the soundness of the Plan and, we would submit, in contravention of the NPPF.

In terms of Question O2.2, Bromsgrove should have carried out an objective and robust full Green Belt review having known for at least two years that there would have to be cross boundary allocations to support the City of Birmingham and that these were likely to be substantial. To delay this Green Belt review does not assist in any way the provision of new cross boundary housing to support the City's very clear need and major deficiency in provision.

### **Matter B1 - Development Strategy**

Based upon the concerns of our Clients listed above, the effect of the likely cross boundary allocations required to support the City of Birmingham's need for new housing provision is not to our mind properly covered by the questions listed in the Development Strategy. There are no questions in the Development Strategy related to the provision of cross boundary employment requirements and this aspect is referred to in the PSL Research Ltd Paper submitted to you today and further questions must be listed to cover these aspects.

### **Matter B2 - Housing**

It is clear from our reading of the submitted Bromsgrove Local Plan that many of the "housing allocations" have either been built or permissions have been resolved to be granted. This needs to be investigated by an appropriate question. There is still not a 5-year housing supply. In our view there is such a substantial under-supply in the Plan Period based upon an "unsound" housing requirement figure that has not been objectively assessed that further sites should have been identified for release at this time. Further, the Green Belt is tightly drawn around all of the settlements and therefore the windfall sites provision for new housing is over-estimated. There needs to be a question related to that aspect.

#### **Matter B2.2**

The policy base is not sufficiently wide and the Plan does not make any proper provisions to support housing for the elderly and people with special needs and therefore there is a clear lack of delivery.

### **Matter B3 - Employment, Retail Transport and Infrastructure**

We have made the point above that even in this section there needs to be a question requesting information on the degree to which Bromsgrove have consulted with the business and employment sectors in order to inform their Plan. This is deficient and we do not believe that these policies are robust in respect of the employment section. In addition there is no strategy for employment growth to match South Worcestershire's proposals or to be in line with the NPPF.

Submitted on behalf of:

Oakland International Ltd

Seafeld Pedigrees Ltd

Taylor Trustees

Mr J Matthews and Mr S Jones

Mr P Stapleton

Kind regards

**Nigel Gough**

Director and Principal

Nigel Gough Associates Ltd