

## EXAMINATIONS OF THE BROMSGROVE DISTRICT PLAN (BDP) and BOROUGH OF REDDITCH LOCAL PLAN No. 4 (BORLP4) DRAFT MATTERS, ISSUES & QUESTIONS PAPER

### Comments on the Paper

1. In response to the Inspector's invitation we submit the following comments on the Draft Matters, Issues & Questions Paper for the Bromsgrove District Plan (BDP) and Borough of Redditch Local Plan No. 4 (BORLP4). The comments relate primarily to the Bromsgrove District Plan.

### Employment and related matters

2. The NPPF clearly identifies the role of the planning system in supporting economic growth as a Core Planning Principle. Para 17 indicates that planning should 'proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities'. Paragraphs 18-22 spell this out in detail and require that 'in drawing up Local Plans, local planning authorities should set out *a clear economic vision and strategy for their area* which positively and proactively encourages sustainable economic growth' (para 21, our italics).

3. Bromsgrove and Redditch are located adjacent to Birmingham and form a functional part of the Greater Birmingham/Solihull economy. The two Local Authorities are members of the Greater Birmingham and Solihull Local Enterprise Partnership (GBSLEP) whose **Strategy for Growth** seeks to re-establish Greater Birmingham's role as the major driver of the UK economy outside London. Bromsgrove and Redditch fall within the 'Enterprise Belt' identified as a key element of the Strategy for Growth. The Greater Birmingham and Solihull Strategic Economic Plan covering investment proposals for the next five years includes proposals for the Enterprise Belt seeking to unlock long-term growth potential and target early investment to create housing and jobs.

4. The GBSLEP has recognised the important contribution to be made by the planning system in supporting economic growth. It launched a Planning Charter under which planning authorities involved in the LEP undertook to be proactive and supportive of business and investment. The LEP has also recognised the disjuncture between provision in existing and emerging development plans and future requirements to support economic growth. It has highlighted the need for a more effective approach to maximising the physical assets within the region, unlocking housing and employment land, and is developing a **Spatial Plan for Recovery and Growth** to set out the scale, broad distribution and directions of growth to

provide a strategic steer and coherence to individual development plans prepared by member districts. The plan will also help inform the Duty to Co-operate.

5. At present the Bromsgrove Local Plan lacks a vision or strategy consistent with its involvement in the GBSLEP. Whilst the Plan accepts the need for consistency with LEP proposals (para 1.20) and asserts that these have been taken into account (para 4.1, second part) there is no specific recognition of the GBSLEP Strategy for Growth or its implications for the provision of land for economic growth or for housing to support that growth. The Plan's proposals for employment land provision are derived from a study undertaken in 2009 and 'updated' in 2012 and state simply that provision of 28ha [of employment land] is 'considered appropriate' (para 8.24) without reference to LEP plans and proposals or (apparently) to up to date economic forecasts.

6. In its response to queries raised by the Inspector relating to the Bromsgrove Local Plan<sup>1</sup> Bromsgrove Council admits, in direct contradiction to the requirements of the NPPF, that 'the BDP is influenced heavily by demographic change and is not an aspirational economic-led plan like the SWDP' (para 2.4 of the response). This response is considerably more informative about the Council's approach than the plan (paras 2.1-2.11 of the response), which only serves to highlight the Plan's weakness in this area. The response puts forward an argument which rejects the use of employment growth-based forecasts of population and household growth as the basis for planning employment and housing growth in Bromsgrove. It goes so far as to suggest (para 2.9) that the area is unlikely to attract a significant increase in economic activity as a result of 'other initiatives across the region where employers would prefer to locate and/or funding is more readily available'. It appears to see the role of Bromsgrove as that of a centre for commuting to the conurbation (and possibly in the future to South Worcestershire) rather than as a part of the Enterprise Belt contributing to sustainable economic growth. It also refers to the need to support 'urban renaissance' but appears to take a narrow view (in contradiction to both NPPF and the GBSLEP Strategy for Growth) implying a future role for Bromsgrove as a base for commuting to employment in the conurbation.

7. This response also accepts that the South Worcestershire Development Plan (SWDP) is compliant with NPPF requirements in relation to the proactive encouragement of economic growth, but argues that this requirement does not apply in North Worcestershire.

8. We clearly consider the aspirations of the Plan in relation to sustainable economic growth to be inadequate and hence that the Plan as it stands is unsound. We do not seek to air these arguments in this paper, but rather propose that the lack of a proper and integrated economic strategy for Bromsgrove within the Plan is an important over-arching issue which should be considered in the Initial Hearings on Over-arching Non Site-specific

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<sup>1</sup> See Bromsgrove District Plan 2011 -2030 (BDP) and the Borough of Redditch Local Plan Number 4 (BORLP4) Councils Response to the Inspectors note of the 26th March, dated 4<sup>th</sup> April 2014.

Matters. We submit that the present matters O.1 and O.2 address this issue only indirectly, whereas it is a central requirement of NPPF which the Plan does not meet. A coherent view of future economic strategy is an essential element to the determination of housing requirements.

### **Housing and related matters**

9. The important role to be played by housing in supporting economic growth is also recognised in NPPF. In addition the GBSLEP Strategy for Growth recognises this and the Strategic Economic Plan includes proposals for additional homes to support growth.

10. The Bromsgrove District Plan as submitted was based on out of date evidence and this was clearly established at the Hearings on the South Worcestershire Development Plan which used the same evidence base in relation to housing. The Inspector concluded unambiguously that the analysis in the February 2012 SHMA for Worcestershire ‘does not provide a reliable basis for identifying the level of housing need in South Worcestershire over the Plan period’ and the same conclusion logically applies to North Worcestershire.

11. In response to the SWDP Inspector’s comments, an updated assessment of housing requirements has been prepared for Worcestershire. In the case of South Worcestershire, the three local authorities accepted the need to base their estimates of future housing requirements on future employment forecasts in order to ensure that they met the requirement in NPPF to positively and proactively encourage and support sustainable economic growth’. The level of provision accepted by the Inspector as representing a full objective assessment of likely housing need is based upon the average of three projections by nationally-respected forecasters, with adjustments to take account of anticipated future changes in labour force participation.

12. Given the authoritative nature of these projections it is difficult to understand why Bromsgrove Council has chosen to adopt a methodology based on demographic factors only which takes no account of the impact of future employment growth. Ignoring this growth and failing to tailor housing provision to meet it is likely to lead to an increase in unsustainable commuting levels into the area. As we indicate above (para 6), the Councils note of 4<sup>th</sup> April 2014 appears to argue that employment growth targets will not be met and that an increase in commuting from Bromsgrove to other areas is a likely outcome. This falls far short of the NPPF expectations of the planning process as supporting economic growth and sustainability.

13. Again it is not the aim of this note to address these arguments in detail. Our concern is that the Initial Sessions on Overarching Non Site-specific Matters Hearings should fully address the economic context and strategy for the Bromsgrove area in its wider context and derive an assessment of housing need which is fully consistent with this context and

strategy. The proposals in the Plan as currently amended clearly do not meet this requirement.

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