



The Planning Inspectorate

Date: 18 September 2015
Ref: PINS/P1805/429/1 & 2

To: Ms R Bamford
Bromsgrove District Council
Borough of Redditch Council

Dear Ms Bamford

**PLANNING & COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
EXAMINATIONS OF THE BROMSGROVE DISTRICT PLAN (BDP) and
BOROUGH OF REDDITCH LOCAL PLAN No. 4 (BORLP4)**

Thank you for your letter dated 14 September 2015 regarding the above. I can comment as follows.

While I understand the Councils' wish to undertake a comprehensive programme of work, I am concerned about the implications of the timescale that you propose for the progress of both examinations. Delaying the final submission of evidence until January 2017 would mean that both examinations would be likely to extend into a fourth year, given the likely need for resumed hearings and any additional consultation that may then arise. You will be aware of the Minister's emphasis on the timely adoption of Local Plans. In addition, Bromsgrove District Council is also committed to an early review of the BDP, including a comprehensive Green Belt Boundary Review. Substantial delay to the present examinations could prejudice both of these objectives. It could also result in other parts of the evidence base becoming out of date.

However, it seems to me that a more focussed exercise could be considered that would build upon the work that has already been undertaken for both plans. As set out in my previous note (see in particular paras 12 and 13) there are concerns regarding the comparative approach to heritage assets that was applied to areas 4 and 5 as well as the overall assessment of site capacities. I accept that these matters will need further work to resolve. However, my other concerns generally relate more to weaknesses in analysis and justification than to failings in the underlying evidence base. The key requirement is that a narrative is available that explains why, in the light of the available evidence, the selected approach has been chosen. It should be clear why sites in the Local Plans have been allocated while others have not been selected.

I explained in my previous note why the previous submissions did not achieve such clarity (see in particular paragraphs 9 and 10). However, you will note that I was satisfied that some parts of those submissions were appropriately justified – see my para 8. I see no need to revisit those. My concerns in terms of justification related to the treatment of the seven areas that had been taken forward into the Focussed Area Appraisal. Put simply, the available evidence – along with the additional

matters mentioned above – should be presented in a manner that, first, demonstrates that all seven areas have been assessed in a comprehensive and co-ordinated way, second, identifies the intended approach to be adopted in the Local Plan (including any modifications, if these are being suggested) and, third, explains the justification for that choice with reference to the evidence.

In my view, such a focussed exercise would be unlikely require a further Broad Area Assessment or Green Belt boundary review: indeed I did not request that either should be undertaken in the context of the present examinations. This could significantly shorten the timescale that you have suggested. Clearly, however, any suggested changes to the plans that might arise from such an exercise would need to be subject to appropriate consultation and sustainability appraisal.

Bearing that in mind, I would invite you to submit a revised programme, with the aim of concluding both examinations within a shorter timescale.

In respect of your query about housing land supply information, it is accepted that a variety of approaches have been taken by Inspectors in the light of specific circumstances. However, I repeat my previous advice that I see no reason in the present cases not to apply the 'Sedgefield' method of calculation, with the buffer being applied to any shortfall.

If you have any queries about the above, please let me know via the Programme Officer. I am asking her to place a copy of this response on the BDP and BORLP4 examination websites. For the avoidance of doubt, the contents of this note are subject to the findings of my final reports in both examinations.

Yours sincerely

M J Hetherington

INSPECTOR