Bromsgrove District Council
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Dear Mr Hetherington,

Bromsgrove District Plan 2011 - 2030 Examination in Public

1. We write in response to your interim conclusions published on the 17th July to inform you of the progress Bromsgrove District Council has made over the subsequent weeks.

2. In line with the recommendations in your conclusions, we can confirm that the following tasks have been carried out. The jobs-led core scenario has been re-run to take into account the 2012 SNPP, and to consider the significance of past employment trends in relation to the current projections, sensitivities have then been applied to this scenario to take into account a range of reductions in the commuting ratios. Alongside this work we have also considered the market signals more fully, bringing together all the previous information together into one document, and have considered this in relation to other information which forms part of the consideration of the objective assessment of housing need.

3. In simple terms it has been concluded the 7000 home requirement which the Bromsgrove District Plan is based on does not require amending, and therefore the evidence base for both the Bromsgrove and Redditch plans remains unaltered, apart from the addition of the enclosed reports. The reason for this conclusion is evidenced fully in the accompanying technical report and its appendices, and is summarised below.

4. As no change to the plan is proposed we would request that the hearings originally scheduled for late September / early October are now rescheduled to take place as soon as possible. It is acknowledged that as part of the interim conclusions a timetable for the process going forward was requested, due to the above fact that no changes are being proposed to the policies in the plan we do not think the provision of a timetable will be necessary and believe the Hearing Sessions can recommence.

Conclusions from additional housing need evidence

Objective assessment of housing need

5. The revised housing figures now utilise the SNPP2012 as the basis for the objective assessment of housing need which gives a baseline figure of 5540 dwellings for the period 2006 to 2030 (Table 1: Edge Analytics report). This figure is significantly lower than the 2010 SNPP and therefore has generated reductions in all of the previous figures identified.

6. The main addition to this piece of work has been the introduction of a reduction in commuting ratios, as you requested. A variety of reduced commuting ratios have been tested which alter the 2011 Census ratio of 1.18 to 1.06 (SS3a). 1.08 (SS3b), 1.04 (SS3c) and 1.0 (SS3d) respectively. These ratios have been applied to each of the jobs led Core Scenarios and Sensitivity Scenarios, resulting in 18 different annual dwelling requirements (Table 3: AMION report). Once the various employment forecasts are averaged, and to be consistent with previous work the numbers are considered from 2006 onwards, with completions up to 2011 and a vacancy rate taken into account, the range is identified as being between 3,710 (SS3d average case) and 9,200 (SS3 average case) as identified in table 4 of the AMION report.

7. It is clearly not suitable to identify such a broad range as the objective assessment of housing need. We also do not think it suitable to include the base SS3 figures as they do not take into account of any reduction in commuting and would not respond to your Interim Conclusions. Further to this we also do not think it is suitable to consider the SS3d figures as it would result in a balance between in and out commuting which is thought to be highly unlikely in the calculation for what is the objective number. If the rationale of the Inspector examining the South Worcestershire Development Plan is to be followed, as would seem to be sensible and consistent, taking the average between scenarios SS3a and the SS3c puts the figure at 5,540 for the plan period of 2011-2030 (Table 4: AMION report).

8. In order to finalise the objective assessment of housing need, the market signals in Bromsgrove District also need to be considered. As evidenced in the market signals report (AMION Appendix B), the signals would indicate that an increase in the overall number should be considered. In the absence of any firm guidance in both the NPPF and the PPG, it is difficult to identify exactly what this increase should be. Due to this lack of guidance the Council does not propose to suggest what the additional allowance for market signals should be, although the Council views the housing requirement number discussed below to be sufficient to cater for this increase to ensure these market signals are responded to.

9. Taking into account this new information and all the various reports we have submitted to the examination since it commenced earlier this year, we are content for you to suggest modifications to the BDP to specify exactly what the objective assessment of housing need figure should be for the period 2011 – 2030. If the figure arrived at is in excess of the 7000 figure in the currently submitted BDP, as noted in your Interim Conclusions there is likely to be implications for the Bromsgrove and Redditch plans progressing. If this is the case we would welcome the opportunity to discuss these implications both from a planning and procedural point of view before any timetable for addressing them is produced.

<u>Housing requirement in the Bromsgrove District Plan</u>

10. As stated above it is not proposed at this point to change the housing requirement from that which was contained in the submitted plan. All the new scenarios which attempt to factor in a reduction in the level of out commuting reduce the housing need to figures lower than previously identified when taking into account the period from 2006 as earlier work has done. As part of the work to determine the Objectively Assessed Housing Need figure, the Council has also recognised the impact of current market signals. As explained above it is difficult to quantify the exact impact this will have on the housing need, but it is considered that these factors should lead to an increase in overall need from the figures contained in the sensitivity tests in the Edge Analytics report. The housing requirement of 7000 homes allows for sufficient flexibility in the Plan to release additional housing through a green belt/plan review

process. This review would be carried out to identify land to meet the needs of the District, and any unmet needs which may be required from others within the housing market area.

11. As you are aware, the needs of the conurbation and the mechanism for Bromsgrove meeting any requirement were discussed at length in the June hearing sessions, the Council welcomes your Interim Conclusions on these matters and does not wish to divert from the suggested approach. As part of the monitoring and review process of plan preparation it is the Council's intention to continually monitor the market signals and employment trends. At the point of the plan/green belt review if these signals demonstrate that a further increase or potentially a decrease in housing numbers specific to Bromsgrove is required, the plan can be adjusted as such to ensure the full needs are identified to the end of the plan period at that point in time. As with the objectively assessed housing need figure, we are content at this stage for modifications to the housing requirement to be suggested and, as stated above, if this is the case, an opportunity to discuss these with you would be appreciated. It must be noted that any changes suggested to the housing figures in the plan would require further formal consideration by Bromsgrove District Council, it is hoped that any changes to the plan could be progressed under the modifications procedures set down in the relevant legislation.

12. I hope that this explains the position of the Council satisfactorily and meets with the expectations you outlined in your Interim Conclusions. We look forward to receiving your response to the additional work we have undertaken, and share your wish to progress with the examination as quickly as possible.

Yours sincerely,

Mike Dunphy
Strategic Planning Manager
Bromsgrove District Council