thornbury house • 18 high street • cheltenham • GL50 1DZ
t: 01242 230066 • f: 01242 230880 • w: www.hunterpage.net

hunterpage planning

Strategic Planning
Planning and Regeneration
Bromsgrove District Council
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

Our Reference: GB/CC/3657/eds
6th November 2013

Sent via e-mail only

Dear Sir / Madam

Representations: Bromsgrove District Plan 2011-2030 Proposed Submission

I write on behalf of Bellway and Bloor Homes, in respect of the Bromsgrove District Plan 2011-2030 Proposed Submission Version consultation which commenced on 30th September and will run until 11th November. This representation focusses on whether the plan is "sound" in relation to the strategic housing requirement and distribution set out Policy BDP2 (Settlement Hierarchy), Policy BDP3 (Future Housing and Employment Growth) and the supporting paragraphs.

In summary, this letter concludes that the housing requirement is not based on the most up-to-date and realistic figures for growth in the District. The evidence base was collated during a period of economic suppression, and as a result the Plan fails to accommodate the full, objectively assessed needs for market and affordable housing which is a key requirement of national planning policy. In considering the tests of soundness, it is concluded that the Plan has not been positively prepared, and is inconsistent with the requirements of the Framework. In this respect, the Plan is unsound, and the housing requirement should be reviewed and modified. The general approach to the distribution of housing growth is questioned given that the majority of the proposed urban extensions to Bromsgrove are focused in the north and west of the Town, which encompass over 2000 houses and it is unlikely that these will be delivered within the next 9 years, particularly given that application have yet to be advanced for the largest of the sites.

In light of this, it is considered that a greater amount of housing should be directed towards the south of the Town which could accommodate the likely increase in numbers and also take advantage of the employment provisions to ensure growth of the Town is balanced in a sustainable manner.

The planning implications associated with the Proposed Submission document are set out below before considering objectively assessed housing need, the distribution of housing and recommendations that should be considered as part of the proposed submission.

Planning Policy Context

Paragraph 47 of the National Planning Policy Framework (the Framework) highlights that Local Planning Authorities should ***'boost significantly the supply of housing'***, and should *'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 this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.'*

Paragraph 158 of the Framework states that:

> *'**Each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence** about the economic, social and environmental characteristics and prospects of the area. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals.' (our emphasis).*

In relation to housing, Paragraph 159 states that:

> *'Local planning authorities should have a clear understanding of housing needs in their area. They should:*
>
> - *prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas across administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:*
>
> - *meets household and population projections, taking account of migration and demographic change;*
>
> - *addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and*
>
> - *caters for housing demand and the scale of housing supply necessary to meet this demand;*
>
> - *prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period.*

Paragraph 178 advises that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities in line with The Localism Act and 2012 Regulations.

Paragraph 182 of the NPPF identified the tests of soundness with which the Bromsgrove District Plan will have to comply, and states:

> *'The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is "sound" – namely that it is:*
>
> - ***Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*

- ***Justified*** *– the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
- ***Effective*** *– the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- ***Consistent with national policy*** *– the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.'*

The housing requirement set out in the Proposed Submission Version will be examined in relation to the above tests of soundness.

Bromsgrove District Plan 2011-2030 Proposed Submission

Duty to Cooperate (DTC)

Paragraphs 1.13 to 1.16 of the Proposed Submission document consider the Council DTC. The District buts up to areas controlled by Redditch Borough, Solihull Borough and Birmingham City Councils. Birmingham has an identified unmet housing need which may require the identification of sites in Bromsgrove in the later stages of the Plan period. Paragraph 1.14 informs that a housing study is currently being carried out across the whole of the Greater Birmingham and Solihull Local Enterprise Partnership area which will provide some of the evidence required for this issue.

Accordingly, this unmet need hasn't been taken into consideration and the Plan, whilst it acknowledges Bromsgrove District will have to accommodate some of the housing needs of Birmingham, does not currently show that this additional housing can be accommodated. This matter needs to be properly addressed.

Housing Strategy

Paragraph 4.7 of the Plan advises that new development will have been directed to sustainable locations around Bromsgrove Town in the first instance, whilst encouraging appropriate levels of housing provision in other sustainable locations, such as the larger settlements. Sustainable and inclusive urban extensions will be established to the north and west of the Town.

Paragraph 4.12 of the Plan informs that the Green Belt boundary will remain unchanged, subject to Redditch Cross Boundary Sites and full Green Belt review by 2023, and the quality of the environment will continue to improve with the existing high levels of open space and 'greenery' within the settlements maintained and improved.

Paragraphs 8.18 to 8.25, which support Policy BDP3, set out the housing requirement over the plan period from 2011 up to 2030. Paragraph 8.18 in particular states that the Council tested a range of scenarios in determining the potential housing requirement for the District and that the most realistic was the *'migration-led and employment constrained scenarios which identified a net dwelling requirement for the period 2011 - 2030 of 6,980 and 6,780 respectively'*. Based on those findings the Council has set a housing target of 7,000 (368.4dpa) for the 19 year plan period up to 2030.

Evidence suggests that more housing is required than has been identified, both in terms of open market and affordable and therefore it is considered that the District Plan does not meet the full, objectively assessed needs for housing, as required by the Framework. This is considered in detail below.

<u>Objectively Assessed Need</u>

The requirement set out in the District Plan is derived from the 'Worcestershire Strategic Housing Market Assessment 2012' (GVA Grimley and Edge Analytics, February 2012). This report primarily used ONS 2008-based Sub-National Population Projections and linked DCLG Sub-National Household Projections. A number of models were utilised to project forward future demand. The outputs of the core scenarios range at the lower end from a projected change in households between 2006 and 2030 under a 'Natural Change' Scenario, which removes any migration in or out of the County, to a projected change in households under an employment-constrained scenario which aligns the working age population with employment opportunities and holds the economic context of today into the future. The higher level is based upon a demographic trend based scenario which uses the latest data around levels of natural change and migration to project forward a continuation of recent historical dynamics. It is clear that even the highest projected change is based on the performance of the existing economy which is experiencing the slow recovery from the worst and longest economic recession since the Second World War.

It is inaccurate to base projected housing requirements on the current economic climate. The Cambridge Centre of Housing and Research supports this view in 'Choice of Assumptions in Forecasting Housing Requirements' (March 2013). It states:

> *'Given the 2011 census was carried out at a time when the country had been in an economic downturn for three years following a period of sharply deteriorating house price affordability, it is to be expected that the rate of household formation was depressed and hence the number of households was below the long term trend. It follows that to make a case for the lower household numbers than suggested in 2008 based on household projections local authorities would need to show that the actual household numbers in their area in 2011 were lower than projected but also to argue convincingly that the shortfall was not due to short term factors that would re balance during the plan period.'* (p.25)

Accordingly, it is considered inappropriate to derive the housing requirement from figures which reflect an economically suppressed period. As such, the Bromsgrove District Plan does not meet the *'full, objectively assessed needs for market and affordable housing'*, which is required by the NPPF. It is clear that there is a need for significantly higher levels of market and affordable housing across the District than identified in the Proposed Submission Document, and the District Plan in its current form will fall significantly short of delivering the level that is identified in the evidence base.

In addition to this, the housing numbers identified in the Bromsgrove District Plan should be considered in the context of Inspector's Conclusions on Stage 1 of the South Worcestershire Development Plan (SWDP), which uses the same evidence base (SHMA) to derive the housing requirement. The most important finding of the Inspector is that the modeling and analysis in the February 2012 SHMA does not provide a reliable basis for identifying the level of housing need in South Worcestershire over the Plan period. Consequently, the Inspector has asked the authorities involved in the SWDP to undertake some further modeling and analysis in order to derive an objective assessment of housing need over the Plan period.

Paragraph 40 of the Inspector's report states that: *'the analysis in the February 2012 SHMA does not provide a reliable basis for identifying the level of housing need in South Worcestershire over the Plan period. This is principally because it introduces inconsistency into the calculation of HRR, uses employment forecasts which appear significantly out of line with those produced by other reputable forecasters, and places reliance on unsupported assumptions about a substantial increase in older people's participation in the workforce.'* In the Case of the SWDP, the Inspector concludes in Paragraph 49 that *'the objectively-assessed housing need figure for the Plan period is likely to be substantially higher than the 23,200 figure identified in the submitted Plan'.* Given that the

Bromsgrove District Plan uses the same evidence base as the SWDP, the Plan should be considered in this context. The housing figure should not be derived from the SHMA, and Bromsgrove District Council should undertake further modeling to derive an objective assessment of housing need.

As such, it is considered that the Bromsgrove District Plan is not compliant with national policy as it has not been positively prepared and is therefore unsound in its current form.

Distribution of Housing

Bromsgrove District contains a single main town, Bromsgrove Town, and a number of other settlements and villages which vary in size and character. The majority (90%) of the District is Green Belt, which covers over 20000 hectares of land. Many of the villages in the District are of a rural nature and in some cases these villages can be relatively isolated. Bromsgrove is by far the largest settlement and stands at the top of the hierarchy with a different order of services and facilities in comparison to all of the other settlements in the District. Bromsgrove Town is therefore the principally preferred location for growth.

There is recognition that Green Belt boundaries will have to be altered in order to accommodate the level of growth that is required over the plan period. However, a Green Belt Review has not been undertaken.

Policy BDP2 sets out the settlement hierarchy and preferred locations for growth which is as follows:

There will be four main facets to the delivery of housing in Bromsgrove District consisting of the following:

BDP2.1 Development of previously developed land or buildings within existing settlement boundaries which are not in the designated Green Belt

BDP2.2 Expansion Sites around Bromsgrove Town (as identified in BDP 5A)

BDP2.3 Development Sites in or adjacent to large settlements (as identified in BDP 5B)

BDP2.4 Exceptionally, affordable housing will be allowed in or on the edge of settlements in the Green Belt where a proven local need has been established through a comprehensive and recent survey and where the choice of site meets relevant planning criteria. Where viability is a concern the inclusion of other tenures within a scheme may be acceptable where full justification is provided. Where a proposed site is within the boundaries of a settlement, which is not in the Green Belt, a local need for housing would not need to be justified

BDP2.5 Proposals for new development should be located in accordance with the District's settlement hierarchy as shown in table 2 on page 20. This will ensure that development contributes to the regeneration priorities for the area, preserves the attractiveness of the environment, reduces the need to travel and promotes sustainable communities based on the services and facilities that are available in each settlement and will assist villages to remain viable and provide for the needs of the catchment population that they serve.

BDP2.6 The Settlement Hierarchy outlined above will provide the guiding principles in terms of sustainability for the proposed Green Belt Review sequential testing as outlined in BDP4 Green Belt.

BDP2.7 The 'village envelope' i.e. the defined settlement boundary for a village, is identified on the Policies Map and will remain unaltered until a review of the Green Belt is undertaken. Within the village envelope appropriate development will be limited to suitable infill plots. This applies to the following villages; Adams Hill, Belbroughton, Beoley (Holt End), Bournheath, Burcot, Clent, Fairfield, Finstall, Holy Cross, Hopwood, Lower Clent, Romsley and Rowney Green.

The distribution of housing in the Local Plan focusses on 'concentrated growth' with development being concentrated within/adjacent to Bromsgrove. In terms of specific allocations, 2016 houses allocated as expansions sites in Bromsgrove, with the majority to the north-west and west of the Town and very little to the south which will result in unbalanced growth for the Town.

In addition to this, Policy BD3 looks at future housing growth and identified development targets over the plan period. The policy identifies a target of 4,600 units between 2011 and 2023. As highlighted above, 2016 of these houses are proposed outside the Green Belt to the north and west of Bromsgrove. This essentially means that 2016 homes need to be completed by 2023 (i.e. within 9 years). Given that the planning applications at these key sites have not yet been submitted, it is considered that these strategic sites are not deliverable within the timeframe set out within the Plan.

In addition, it is contended that the actual housing requirement is higher than that identified within the Local Plan as previously explained. As a result, more land for housing needs to be identified across the District as a whole. It is therefore considered that the overall housing distribution should be reviewed and further growth to the south of the Town should be considered.

Recommendations

Whilst development is required in the locations that have been allocated, it is considered that there should be a wider distribution around Bromsgrove to encourage balanced and incremental growth for the Town as a whole. It is clear from the above that the housing requirement will need to be reviewed and most likely revised to reflect a more positive growth strategy for the District, rather than the economically constrained vision that is currently promoted.

As such, the distribution of the allocated housing should be revised, to include more growth to the south of the Town. This would be logical given the concentration of employment opportunities in this part of the settlement. Given the shortfall in housing, and the questionable deliverability of the strategic allocations highlighted above, it is considered that it is better for the Plan to include other sustainable sites to the south of Bromsgrove to make up this shortfall. For example, my Client's site at St Godwalds Road, is suitable for development and could provide an extension to the existing allocation at Wagon Works. The site is sustainably located, and it is very close to a number of local services including schools, retail, and a number of public transport services, including Bromsgrove Railway Station. The site has previously been considered in the Council's SHLAA 2012 (BDC79).

Summary

The above analysis has demonstrated that the housing requirement set out in Policy BDP3 of the Bromsgrove District Plan Proposed Submission Document has been based on figures from an economically suppressed period, and as a result the actual requirement is likely to be higher. Plans should account for better economic times where there will be a greater formation of households and a need for more housing and demographic analysis should be carried out using the latest available official population projections. In addition, the figures are derived from the Worcestershire SHMA which is not considered to be a reliable base for identifying housing requirement.

It has been demonstrated that the Plan fails to accommodate the full, objectively assessed needs for housing which is a key requirement of the NPPF. In relation to the tests of soundness identified above, it is considered that the Plan has not been positively prepared, and is inconsistent with the requirements of the Framework. In this respect, the Plan is unsound, and the housing requirement should be reviewed and modified.

I trust this letter will be taken into consideration; however, if you require any further information, please do not hesitate to contact me.

Yours sincerely

Part B **(see Note 1 and Note 8 para 4.2)**

Please use a separate Part B form for each representation you wish to make

Name or Organisation **(see Note 8 para 4.1)**

1. To which part of the BDP does this representation relate?

Page:	Paragraph:	Policy: Policy BDP2 (Settlement Hierarchy) and Policy BDP3 (Future Housing and Employment Growth)
Policies Map:	Other document:	

If your representation does not relate to a specific part of the document, or it relates to a different document, for example the Sustainability Appraisal, please make this clear in your response.

2. Do you consider the BDP is legally compliant? **(see Note 2)**

Yes:☐	No:☐

3. Please give details of why you consider the BDP is not legally compliant. Please be as precise as possible. If you wish to support the legal compliance of the BDP, please also use this box to set out your comments. (Continue on a separate sheet /expand box if necessary)

4. Please set out what change(s) you consider necessary to make the BDP legally compliant, having regard to the issue(s) you have identified above. You will need to say why this change will make the BDP legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) **(see Note 8 para 4.3)**

5. Do you consider the BDP is sound? **(see Note 3)**

Yes:☐	No:☒

Do you consider the BDP is **unsound** because it is not:

(1) Justified **(see Note 4)**	☒
(2) Effective **(see Note 5)**	☐
(3) Consistent with national policy **(see Note 6)**	☒

(4) Positively prepared **(see Note 7)**	☒

6. Please give details of why you consider the BDP is unsound. Please be as precise as possible. If you wish to support the soundness of the BDP, please also use this box to set out your comments.
(Continue on a separate sheet /expand box if necessary)

The housing requirement is not based on the most up-to-date and realistic figures for growth in the District. The evidence base was collated during a period of economic suppression, and as a result the Plan fails to accommodate the full, objectively assessed needs for market and affordable housing which is a key requirement of national planning policy. In considering the tests of soundness, it is concluded that the Plan has not been positively prepared, and is inconsistent with the requirements of the Framework. In this respect, the Plan is unsound, and the housing requirement should be reviewed and modified. The general approach to the distribution of housing growth is questioned given that the majority of the proposed urban extensions to Bromsgrove are focused in the north and west of the Town, which encompass over 2000 houses and it is unlikely that these will be delivered within the next 9 years, particularly given that application have yet to be advanced for the largest of the sites.

7. Please set out what change(s) you consider necessary to make the BDP sound, having regard to the test you have identified at 6 above. You will need to say why this change will make the BDP sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Continue on a separate sheet /expand box if necessary) **(see Note 8 para 4.3)**

Please see attached representation.

***Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s), as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.*

After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

8. If your representation is seeking a change, do you consider it necessary to participate at the oral part of the examination? ***Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

No, I do not wish to participate at the oral examination	☐
Yes, I wish to participate at the oral examination	☒

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary. (Continue on a separate sheet /expand box if necessary)

To ensure the appropriate level and distribution of housing is considered within the District.

[redacted]

Date: 11/11/2015