

Barton Willmore Comments on PBA Strategic Housing Needs Stage 2 Report (EXAM 90)

Generally, we do not consider that this additional information changes our position, as we note that the evidence presented by the City Council in relation to OAN prior and during the Hearing is the same as that detailed at Tables 3.2, 3.3 and 3.4 of the Stage 2 Report in respect of Birmingham City (under the projections PBA Trends 2001-2011 and ONS/PBA 2012).

These demographic based trends, as summarised and included within the attached table (EXAM 81) prepared by Barton Willmore to provide a comparison with the figures we presented at the Hearing, provide a range of 89,020 - 115,880 dwellings compared to our range of between 88,072 - 111,761 dwellings for the period 2011-2031. Whilst these two ranges are similar, our case at the Examination was that the OAN should be at the higher end of our range as the BW Full Return scenario would help to address Market Signals, whilst the City Council's preferred scenario at the lower end of their range would not, contrary to the guidance in the NPPF and PPG (BCC also conceded however their preferred projection did not represent OAN and was a 'policy on' figure). In this respect, it is notable that paragraph 5.6 of the Stage 2 Report states the following:

"these demographic projections are a minimum measure of housing need, because they take no account of market signals, future employment and affordable housing need.....In line with national guidance, these considerations may increase the assessed need over and above the demographic projections, but they cannot reduce it"

Yesterday, we were notified that the City Council issued to the Inspector a 'Proposed Work Programme' prepared by PBA to update the Birmingham SHMA 2012 to bring it line with the PPG. This acknowledges under Paragraph 2 that the update would comprise 5 main sections to include an analysis of the main market signals identified by the PPG in order to consider whether the demographic projections should be adjusted upwards and if so what the adjustment should be.

The two points highlighted above further emphasise the case we made at the Examination that the City Council had not undertaken a national policy compliant objective assessment of housing need, and specifically and as acknowledged by the City Council at the Examination, that it had not undertaken an assessment of market signals when determining its OAN. Barton Willmore's assessment has undertaken such an analysis which demonstrates that the preferred approach to provide 111,760 dwellings during 2011-2031 is much more likely to ensure that affordability can be improved, which in turn will alleviate worsening overcrowding and concealment which are identified as major problems within Birmingham.

We trust that the above comments are of assistance to the Inspector. Clearly, if the City Council are required to do further work in respect of OAN before the Inspector issues his final Report, we would expect there to be a further opportunity through formal consultation on any new evidence prepared by the City Council and trust we will be notified accordingly should this occur.

Daniel Hatcher
Director