

**Paul Gilmour Response to PBA Stage 2 Report (EXAM 90)**

In response to the GBSLEP PBA Stage 2 report I thought it best to frame my responses round your questions from the examination easy of reference

Is the Plan based on an objective assessment of the full needs for market and affordable housing in the housing market area over the Plan period?

As was confirmed at the hearings the plan was not based on an OAN of the full needs for market and affordable housing.

I believe that BCC's position was that the PBA stage two work should now be relied upon to be an OAN.

As confirmed at 3.1 & 5.6 of the stage two report – the report does not provide a policy compliant OAN of the full needs for market and affordable housing.

Given that most of the policies within the BDP are effected by, if not based on, the level of growth within the city I have no idea where that really leaves the Plan –can it really be so simply as to increase the AON by 10,000 or more but not change anything else as suggested by BCC in the hearings?

Do we not need to plan for the unmet need and put policies in place which drive delivery of unmet need outside of the City? For example we could have a new PG4

**PG4 – growth outside the City**

**As detailed in Strategy over the plan period the City cannot meet all its own needs for Housing or employment land. As a result to achieve the vision and fulfil the objectives as set out the City will pursue a robust strategy of maximising sustainable development opportunities within other LPA's. The purpose of which will be to identify as soon as reasonably practicable 105% of the unmet need as identified in this Plan. We will work together with the other LPA's within the HMA to complete the early reviews of their local plans as soon as reasonably practicable after the release of the GBSLEP stage 3 report or within 2 years in any event.**

Such a policy would give certainty to the other LPA's over Birmingham's position and give the region some chance of actually growing rather than stalling.

In addition this would keep the pressure on the other LPA's to do what they all told you they would do and review if the need arose.

The alternative would be a commitment by Birmingham to early review this plan in two years' time (see below).

If not, what alternative objective assessment of housing needs should the Plan be based upon?

A policy compliant HMA study with a proper policy off OAN figure generated for the HMA and each of the LPA's within it. Which I believe is what you have asked for.

However, as detailed in para 3.34 in the summary, PBA have produced two AON figures

*for the technical reasons discussed earlier, in our view the most credible demographic projections for the GBSLEP area are:*

*; Trends 2001-11, showing 8,000 net new households p.a.*

*; ONS/PBA 2012, showing 6,800 net new households p.a.*

Which from table 3.3 is for Birmingham alone

Trends 2001 – 11:            5,620 pa = 112,400 for plan period

ONS 2012:                    4,317 pa = 86,340 for plan period

As discussed in 3.44 & 3.45 there is no certainty over which is right however the NPPF is clear that plans should be flexible, as the lower figure offers no flexibility the upper should be used.

In addition I would draw your attention to 3.15 & 3.16 whilst the PBA update note (26/11/14 no exam ref at this time) states that DCLG's view is to ignore UPC we have no evidence that the 2011 census is wrong just a larger than expected change between the last census and 2011.

Whilst 3.45 outlines the negative effects of choosing too high an OAN in practice any additional development provided in other LPA's will be late in the plan period and therefore could be curtailed if and when the lower number is shown to be correct. I believe that para 14 of the NPPF should be the driver here there are no specific policies which indicate delivery should be constrained.

The alternative would be a commitment by Birmingham to early review this plan in two years' time (see below).

What proportion of the assessed housing needs should be met outside the Plan area, and by what mechanism should that proportion be distributed to other local planning authorities' areas?

I would draw your attention to para 4.77, 4.78 & 4.79, if the PBA work is to be the basis of any meaningful distribution of the Birmingham shortfall (whatever it may be) we need a methodology which actually looks at all the sites available not just the politically acceptable ones or only identifying enough sites within LPA's to meet there own need.

As detailed in 4.86 potential supply has not really been considered because the

data is coming from the LPA's is Policy On (Lichfield has 1000's of acres of green belt & thousands of acres of none green belt land yet only 10,000 not currently developable plots), constrained and not consistent with the other SHLAA's within the HMA .

How can any distribution of unmet need which flows from this work (or stage 3) be NPPF compliant when the underlying evidence is not?

Insofar as the Plan relies on other local planning authorities to deliver a proportion of its housing requirement, what mechanisms exist to ensure that the other LPAs will comply with this approach?

*para 4.165 In line with the National Planning Practice Guidance, local planning authorities across should agree common methods for assessing land supply across the housing market area. Rather than start from a given target and identify enough capacity to meet that target, the PG directs that such assessments should identify sites and broad locations capable of development regardless of the targets that the authorities are aiming to meet.*

We currently have no mechanism to ensure other LPA's deliver any of the additional need – once you find this plan sound (in some form or another) the problem just fades into the background.

Despite years of work we currently have no board locations for development for the unmet need just a promise that it will be dealt with by others...

There is no real driver for any of the other LPA's to deliver on their promised early reviews any time soon nor is there any policy requiring Birmingham to attempt to drive such delivery.

I believe what we need in this plan is a commitment to early review at two years from adoption.

#### **PG4 – Birmingham Plan Re-View**

**As detailed above over the plan period the city cannot meet all its own needs for Housing or employment land. As a result to achieve the vision and fulfil the objectives as set out the city will pursue a robust strategy of maximising sustainable development opportunities within other LPA's. the purpose of which will be to identify as soon as reasonably practicable 105% of the unmet need as identified in this Plan. We will work together with the other LPA's within the HMA to complete the early reviews of their local plans as soon as reasonably practicable in addition to ensure that we can meet the development needs of the area this plan will be re-viewed at 2 years from adoption.**

This would mean that the new BDP could in theory be written taking into account:

all the information that project fields say was written after the consultation,

policy compliant SHLAA,  
a policy compliant SHMA,  
the 3<sup>rd</sup> stage of the LEP PBA work,  
a new GBSLEP Spatial Plan,  
policy compliant and consistent SHLAA's across the HMA  
new headship rates  
outcome of investigation into un-attributable change  
a policy compliant EA & SEA  
a sound OAN.

This would keep the pressure on Birmingham so the LEP/PBA work would have to actually happen and the spatial plan would actually contain a plan. In addition it would also ensure that the "missing" houses were being picked up somewhere as it would give the surrounding LPA's chance to make good on all those early review promises.

In addition this resonates with your request that Birmingham identify a Policy for monitoring and reviewing the headlines within the plan and giving it some teeth if the delivery slips out of line with the trajectory. Whilst there is no trajectory or monitoring of the delivery of any of the unmet need within the BDP as it stands - Such a modification brings the method of delivery of the unmet need within the scope of a new BDP EiP ensuring the issues actually get dealt.