
Response to PBA Strategic Housing Needs Study (November 2014) – Relevant to Matter A

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The Birmingham Development Plan ('BDP')

- 1.1 In terms of context the Plan includes the following relevant statements:
- 'There are significant challenges in identifying appropriate sites to accommodate and deliver the long term levels of growth needed within the built up area. This will require joint working with partners in adjacent areas to address where housing and employment is best located' (para 2.18)
 - 'The land available to the City to accommodate future development is limited. Alongside the BDP a wider growth strategy for the LEP and other adjoining authorities will set out how and where remaining houses could be delivered' (para 3.27)
 - 'Options outside the City's boundaries will need to be explored (para 4.6).
- 1.2 The BDP acknowledges a need for 80,000 new homes over the period 2011 to 2031 (para 4.4 and 8.11). However, Birmingham City Council ('BCC') plans to deliver only 51,000 within its boundaries (Policy PG1). To deliver the 'missing 29,000' it relies upon effective collaborative work with neighbouring councils ('NC') (also refer to para 4.7 and 8.11).
- 1.3 Para 4.7 of the Plan again re-iterates the need to work collaboratively with neighbouring authorities to secure the development of further homes to contribute toward meeting the (Birmingham's) requirement over the period to 2031.
- 1.4 The Duty to Co-Operate statements dealt with under Matter F, Section b) 2, refers to 'the scale and distribution of the resultant shortfall' and that 'the satisfactory resolution of these issues will be achieved through 1) completion of the GBSLEP Strategic Housing Needs Study and 2) distribution of need through the second iteration of the Strategic Spatial Framework Plan and through arrangements negotiated with other authorities ... as justified by the evidence'.

The Strategic Housing Needs Study (Stage 2 report) – 'SHNS'

- 1.5 The following issues illustrate that the SHNS is not 'fit for purpose', primarily that it is not a Strategic Housing Market Assessment for the purposes set out in para 159 of

the NPPF. This has fatal consequences for Birmingham City in that their own SHMA is based on superseded out of date evidence.

- 1.6 The NPPF and the NPPG clearly set out the manner in which OAN for housing must be established, which in summary require four components – demographic, economic factors, affordability and market signals. The SHNS does not demonstrate that it properly deals with all components, and is demonstrably a ‘demographic only’ study. It cannot therefore be considered an objective assessment consistent with the NPPF and NPPG.
- 1.7 Section 3 of the report is without conclusion or firm outcome in relation to future housing need and has therefore failed in its role set out in DtC statements.
- 1.8 Section 4 deals with Housing Land Supply and again lacks objectivity, and disappointingly, impartiality. It covers ‘development capacity’ but is merely a basic review of local authority SHLAA’s in the GBSLEP are but is immediately constrained by their nature of ‘how much capacity they needed to identify to meet housing need or plan targets’ (para 4.34). Para 4.38 says that Lichfield ... SHLAA is ‘policy off aiming to find as many sites as possible’ and 4.44 that ‘Lichfield’s SHLAA states that no types of land or areas are excluded from the assessment’. However para 4.54 says that Lichfield’s SHLAA focuses its survey on Lichfield and other settlements defined in the 1998 Local Plan, because they are considered sustainable locations. Para 4.58 says that ‘Lichfield bases its assessment on the emerging Core Strategy’, when in fact it has a submitted Local Plan that gone through examination. At para 4.99 it states ‘after Birmingham, Lichfield has the largest amount of not currently developable capacity’ (of about 100 sites in their SHLAA of November 2013). However, it is stated that ‘the Council considers these sites to be unsustainable because they are outside the settlement hierarchy. The larger sites are mostly constrained by Green Belt, access, the Cannock Chase SAC, and flooding. The Council considers that the SHLAA covered all available sources and sites’. This demonstrates a seriously flawed approach in relation to matters that were properly dealt with at examination by the Inspector in October 2014, and demonstrates an un-objective approach that fetters proper consideration of the strategic issue at hand of unmet need. This is exemplified by the statement in para 4.103 that ‘estimated capacity (across the GBSLEP) is only a broad approximation, and the available information on constraints is broad-brush’.
- 1.9 Para 5.14 states that ‘constraints have not been studied in detail’ in relation to related authorities and para 5.19 that ‘more work is needed to quantify and test capacity in related authorities’. This clearly demonstrates that properly assessing the ‘Birmingham need’ is still not advanced anywhere near far enough to properly demonstrate that that this strategic issue of the highest importance is not effectively

dealing with either process or outcome, even in advance of the major issue of properly distributing unmet housing needs to other local authorities.

Birmingham's housing needs – the implications

- 1.10 Plan making to c2030 is effectively moving forward in full knowledge of a huge unmet housing need to serve Birmingham's needs, under an arms-length process handled by a non-statutory planning body. The SHNS clearly shows that the LEP approach is simply not going to address the objectively addressed housing needs of Birmingham City. It is a flawed report that is underlain by a flawed approach.
- 1.11 The approach is not 'effective' nor is it 'consistent with national policy'. The SHNS does not properly deal with the delivery of the homes that Birmingham and the region needs (NPPF Para 7 second bullet point; Para 17 third bullet point and Para 47 first bullet point). There is no clear and objective indication in the SHNS that the needs of Birmingham have been objectively set and there is a reliable basis / stage on which any further work will convince that the required housing will be delivered, when and where.
- 1.12 The SHNS is simply an un-objective academic exercise to seek to understand unmet housing need, and admits at Para 3.42 'sometimes large difference between the five projections, including the official projections and our own'. It avers to statements like 'nor can we predict' and 'there is no certain answer' in wrestling with projections and the issue of related authorities, which demonstrates the lack of the objective certainty in achieving the effective outcome set out in DtC statements as stage 1.
- 1.13 The SHNS demonstrates ineffectiveness at this stage as the crucial strategic mechanism required for fulfilling housing need. At a time when the Government's Planning Minister is lauding the effective strategic planning mechanism set up in Greater Manchester, the Birmingham mechanism heaped on the GBSLEP is failing and is simply not going to fulfil the requirements of sound Plan making.
- 1.14 The SHNS fails to provide the answers to the following key questions, and BCC is no further forward in providing the necessary answers:
- Where will the 'missing' housing be delivered?
 - When in the plan period will the missing housing be delivered?
 - How will BCC ensure delivery of housing in the early years of the plan period within its boundaries before delivery of the missing housing comes on-stream outside its boundaries, so that over the plan period the full objectively assessed need for housing is met either within or outwith BCC's boundaries?

- How will the delivery of the missing housing be monitored?

1.15 And even:

- When will BCC have a clear understanding of where and when the missing housing is to be delivered?