

Comments from Mr Paul Gilmour Upon PBA OAN Report (EXAM 145)

Exam 131 reads "15. ...I would therefore welcome a further consideration of the consequences, in terms of accuracy, of excluding UPC from the projections)"

The new report does not seek to answer this question directly rather answering the question - why should we ignore UPC?

The answer to the question actually asked is given at 3.21 & 3.16

Net new dwellings per annum 2011-31	ONS / PBA 2012		
	Without UPC	With UPC	Impact of UPC
Birmingham	4,450	5,230	780
Rest of HMA	5,483	6,670	1,187
Total HMA	9,933	11,900	1,967

Source: PBA

3.21 "For the Birmingham HMA the UPC is large and positive; therefore, if the UPC is included in past migration the projected housing need is larger than if the UPC is excluded. Across the HMA, including the UPC adds some 1,900-2,400 dpa to the projected housing need, depending on the scenario used. For Birmingham City on its own, including the UPC adds 770-980 dpa."

Which is to say that if UPC were included an additional 15,600 to 19,600 homes would be required in Birmingham alone.

Taking the lower of these numbers that's a 17% difference, so possibly not an accurate OAN at all.

Despite Exam 131 reading "15. ...Notwithstanding the position likely to be taken by DCLG...",

The rest of section 3 goes on to justify why the UPC should simply be ignored by following the DCLG & ONS lead...

3.20 ..." The key reason for the ONS's decision is that it would be methodologically difficult to make an adjustment for the UPC, because it is unclear how much of it is due to errors in population count as against migration estimates."

3.21 "We have looked closely at the historical data on the UPC in Greater Birmingham and have found no evidence that would help disentangle the causes of the UPC. Carrying UPC forward into future projections of housing need would compound these uncertainties."

Therefore the reason for ignoring UPC is not because it has no bearing on the accuracy of the projections but because dealing with it is statistically difficult.

As shown in 3.22 " ...in technical terms there is no basis on which to adjust the rojections to take account of UPC. At national level the ONS has decided against such an adjustment, and

CLG in the 2012-based household projections has followed suit.....For the birmingham HMA we have not found any evidence to help disentangle the causes of UPC and hence we have no basis on which to make an adjusted projection..."

Whilst I agree that as far as development within Birmingham is concerned the OAN being highly inaccurate and short to the tune of 15 - 20,000 units does not have any consequence as Birmingham cannot meet its own need.

However, the Inspectors requested Mod at para 84 of exam 131 makes the level of accuracy very important for the HMA – the accuracy of the OAN and therefore the shortfall being provided for by the other LPA's is of crucial importance to the region.

Whilst we still wait to see the GBSLEP housing study part 3 the inevitable consequence of ignoring the UPC is an even greater shortfall of delivery against real OAN across the HMA – as the LEP cannot plan for something they do not have details of.

In closing I find the following very telling at 7.9

"None of this analysis gives us reason to reconsider the Council's position that the Birmingham Development Plan should be based on an objectively assessed need of 89,000 net new dwellings in 2011-31, based on the SHNS's ONS/PBA 2012 scenario."

There has been no attempt to reconsider the council position just an exercise to justify the existing policy.