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## Response to Supplementary Housing Needs Report

By Peter Brett Associates of March 2015.

## On Behalf of Mr M Neachell

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This report is designed to deal with the substantive issues raised with regard to the OAN at the first part of the examination. It concludes that the OAN of 89,000 net new dwellings for the Birmingham City Area is correct. However it does reveal that there are clear differences in the approach to household formation rates, and the approach preferred by Barton Wilmore is the "full return method" This is described as a more optimistic alternative to other scenarios. In this method HRRs still follow CLG 2011 until 2021, but thereafter they grow faster, gradually converging with the CLG 2008 rates, so by 2031 they are equal to those CLG 2008 rates.

Para 2.25 makes it clear that the Inspector Mr Holland at the Derbyshire Dales Inquiry had in the evidence before him both 2011 based and full return scenarios. That para goes on to assume that if he had an alternative method in front of him in the form of an indexed projection he might well have chosen it.

However that is not the case and on the face of the matter he indicated that a common sense and practical approach that returned to the higher 2008 rate after 2020 was appropriate.

In our view a positive approach is to take the full return option. This a positive approach in line with the NPPF and planning to boost the housing supply.

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The conclusion to this report indicates that the OAN is some 89,000 dwellings [net] for the City. However the previous documents and the opening position of the City Council [in Exam 39 para 9 ]was that the housing need was indeed a range from 89,000-115,000 dwellings. [from the SHMA] There is nothing in the recent paper that deals with the range and why the lower end of the range is being planned for. Submissions by the Council indicated that they had simply planned for the lower end of the range because of the consequences of land take, green belt etc, and this was the only explanation given. That position still remains despite this further work and it remains unclear why the lower end of the range is being planned for and why this had been discounted from the higher figure. This issue remains to be clarified and is not dealt with in this additional document.

JVH 10<sup>th</sup> April 2015.