



BIRMINGHAM DEVELOPMENT PLAN EXAMINATION

EXAM 145: OBJECTIVELY ASSESSED HOUSING NEED SUPPLEMENTARY REPORT

INITIAL REPRESENTATIONS ON BEHALF OF THE LANGLEY SUE CONSORTIUM

APRIL 2015

Introduction

1. Savills submitted representations previously with respect to Matter A of the Birmingham Development Plan (BDP) Examination. Savills has been instructed by the Langley SUE Consortium to submit further representations with respect to the BDP Examination document EXAM 145, the Objectively Assessed Housing Need Supplementary Report (March 2015), produced by Peter Brett Associates (PBA), and which is referred to hereafter in this submission as “the Supplementary Report”.
2. The Langley SUE Consortium, referred to hereafter as “the Consortium” comprises a collection of landowners, national and regional housebuilders and development companies who together control the majority of the land within the SUE. The Consortium Members are working together to actively promote the SUE and ensure that the SUE can be delivered in a timely fashion, including through a decision to enter into a Collaboration Agreement and the joint commissioning of additional baseline technical studies to support the masterplanning of the site.

Comments

3. The Consortium notes from Table 2.3 of the Supplementary Report that the reported findings from the analysis undertaken of the DCLG 2012-based household projections for the period 2011-2031, with respect to Birmingham (4,420 dwellings per annum), are identified as being very similar to the results of the index-method used by PBA previously (4,450 dwellings per annum).
4. The Consortium also note that PBA conclude at paragraph 7.10 of the Supplementary Report that, as a result of the additional analysis undertaken with respect to household formation,

Unattributable Population Change, future employment, market evidence and affordable housing need, *“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 2011-2031, based on the PBA SHNS’s ONS/PBA 2012 scenario”*. PBA is therefore proposing no change to the objectively assessed housing need figure presented previously at the BDP Examination.

5. However the Consortium has picked up on the fact that PBA has identified that the DCLG 2012-based projections still do not have the benefit of real-life Census data on Household Representative Rates by demographic group and that PBA has excluded Unattributable Population Change (UPC) from its consideration of housing need due to difficulties in accurately adjusting the projections to help take account of UPC and disentangle its causes.
6. The Consortium also notes that PBA state at paragraph 7.11 of the Supplementary Report that *“it would not be appropriate to restart our analysis on the basis of the new projections”*. In addition, it is not clear whether the Supplementary Report justifies whether the affordable housing target can be met with respect to the full Birmingham OAHN, or whether the OAHN would need to increase to improve affordable housing delivery.
7. In this regard, it is not clear whether the Supplemental Report contains sufficient information to take full account of the new DCLG 2012-based household projections, as requested by the Inspector¹. If further analysis is required, then the Consortium appreciates that the OAHN for the Plan period may accordingly increase from PBA’s current position of 89,000 dwellings.
8. Nevertheless, if the OAHN figure applied going forward remains at 89,000 dwellings during the Plan period, or even if it ultimately increases further as a result of undertaking more detailed modelling, Birmingham City Council (BCC) will still need to rely on other local authorities to meet some of its housing need, on the basis that BCC does not have sufficient capacity within its own administrative boundary. However the Consortium wishes to stress that the final OAHN figure should not impact on the BDP proposal (Policy GA5) to

¹ EXAM 131 – Inspector’s Interim Findings following the hearing sessions (5 January 2015), para 16.



accommodate a significant proportion of Birmingham's OAHN within the BCC administrative boundary at the Langley SUE, due to the inherent sustainability of this location.

9. If further analysis of the 2012-based DCLG household projections, or additional consideration of market signals, employment scenarios, affordable housing, Census-based Household Representative Rates or Unattributable Population Change become available during the remainder of the BDP Examination process, the Consortium wishes to reserve the right to make further comments at the appropriate time(s).